

31 March 2025

To: President von der Leyen, Executive Vice-President and Commissioner Séjourné,
Executive Vice-President Ribera, Commissioner Roswall

An ambitious REACH revision is key for the Circular Economy

Dear President, Executive Vice-Presidents, Commissioners,

We, the companies signing this letter, want to express our support for an ambitious revision of the REACH regulation that is in line with the EU Chemicals Strategy for Sustainability. We do not support deregulation or weakening of the current provisions. Instead, REACH should become the key enabler for a **competitive toxic-free circular economy**.

We are producers of many different products that are widely used, such as construction products, cars, electronics, furniture and fittings, food contact materials, textiles, cosmetics, sports equipment and apparel, industrial mixtures, drinking water, recycled materials, nutrients, and more. We support a phase-out of the most harmful substances to foster non-toxic material cycles. We are convinced that this is the only way to achieve a competitive circular economy.

Our companies put significant resources into identifying and substituting harmful chemicals and we strive towards circularity. However, to be competitive, we need REACH to reward safer chemicals and products. A clear, consistent, and predictable regulatory framework will spur innovation and the competitiveness of European companies.

We urge the Commission to take in account the following in your proposal for a revised REACH:

1) Extend Generic Restrictions to the most harmful substances

REACH must enable a phase-out of all the most harmful substances¹ from consumer and professional products. Restrictions based on the generic risk management approach (GRA) with clear end-of-use dates are crucial to provide certainty for all stakeholders. GRA restrictions would significantly reduce the presence of harmful chemicals in both virgin and recycled materials, diminishing risks to human health and the environment over their entire lifecycle.

¹ As defined in Table 1 of the Communication from the Commission – Guiding criteria and principles for the essential use concept in EU legislation dealing with chemicals (OJ C, C/2024/2894, 26.04.2024, ELI: <http://data.europa.eu/eli/C/2024/2894/oj>).

Phasing-out the use of the most harmful substances is necessary to ensure trust in recycled materials and products made from recycled materials. This is a prerequisite for a well-functioning market for secondary raw materials. Which in turn is key for the creation of a competitive circular economy and the success of the announced Circular Economy Act.

2) Regulate groups of substances

Relevant grouping of substances with similar hazard properties, particularly in restrictions, should be a priority. Such an approach will not only encourage the use of less hazardous alternatives but also help avoid regrettable substitutions, which is costly for all.

3) Strengthen Hazard Information Requirements

The upcoming revision should strengthen data requirements on hazard properties of substances at the registration step, including on relevant polymers. This increased transparency is fundamental for the identification of chemicals in products during the full life cycle and for efficient risk management by all actors.

If REACH delivers on safer chemicals and widespread uses, it will also enable other legislation and initiatives to achieve their aims, such as the EU's Circular Economy Action Plan, the upcoming Circular Economy Act, the Ecodesign for Sustainable Products Regulation (ESPR), EU water-related legislation and the Water Resilience Strategy, and product-specific legislation.

In summary, we urge the Commission to develop an ambitious proposal for a targeted revision of REACH that prevents harm and avoids 'circular pollution'. We are convinced that REACH can become the needed cornerstone towards a toxic-free circular economy that enhances the global competitiveness of European industry while benefiting human health and our environment.

We look forward to collaborating closely with you to make this happen.

Sincerely yours,



Polestar



