



POLICY

Simplifying REACH is... simple. Here's how to do it

The EU Commission's president, Ursula von der Leyen, has said she aims to simplify the REACH regulation and clarify PFAS. As a gesture of good will (it will soon be Christmas, after all), ChemSec has decided to help out and is sending her a pair of letters. Here is the first.

Published on 02 Dec 2024



Dear Madame President,

On behalf of ChemSec, Europe's chemicals watchdog, we were pleased to see you state that one of your [political priorities](#) for your presidency will be to “stay the course on the goals set out in the European Green Deal”. It embodies the high ambition necessary to properly address the issue of hazardous chemicals that threaten citizens and the environment in Europe.

You also said that you “aim to simplify REACH”. We thought we could help you here by doing the crucial groundwork for that task.

In reality, Madame President, simplifying REACH does not have to be complicated. One key aspect of the [Chemicals Strategy for Sustainability](#) will take care of it for you. That is the Generic Risk Approach, or GRA, to phasing out the most harmful substances.

The approach has delivered major health benefits for EU citizens in recent decades. By merely following through on the plans already laid out in the Strategy, you can make your life easier – and make a huge difference.

The Generic Risk Approach *is* simplicity

We are constantly exposed to toxic chemicals, whether we like it or not. They are in the food we eat, the water we drink, the air we breathe and the products we surround ourselves with. We cannot set “safe” levels of exposure for the most harmful substances, even though some industry proponents would say otherwise – calculating them is impossible. Adding a circular perspective makes estimating exposure even more complex (an aspect that is particularly relevant for persistent substances).

Featured news



POLICY

The simplest and most effective way to deal with this problem is therefore a *generic* risk approach that prevents the most harmful substances in products from entering the market in the first place. Isn't this what it's all about? To protect the EU citizens and the environment from the toxic chemicals?

This procedure would complement the authorisation procedure, which covers other uses. A streamlined authorisation procedure remains a substitution-driving element of REACH, acting as an umbrella to ensure a systematic phase-out of Substances of Very High Concern.

With the Generic Risk Approach, we would have a quicker procedure in the REACH toolbox, one that can truly improve the system. Not only would the REACH regulation become simpler, it would also lead to a whole heap of other benefits. Here are four more ways in which extending the use of restrictions through the Generic Risk Approach would simplify REACH *and* make it more effective:

1. Save time and money

At the moment, the EU's procedures to regulate chemicals are lengthy and burdensome. For substances to be restricted, they usually need to undergo a specific risk assessment, which takes a long time and costs a lot of money. And experiences from recent years have shown that there are serious problems associated with the traditional risk assessment approach — particularly when it is used for the most harmful substances.

One of the more obvious problems has to do with “safe levels”. Remember when the European Food Safety Authority (EFSA) lowered the Tolerable Daily Intake limits for Bisphenol A by a factor of 20,000? This is what tends to happen over time as more scientific research is published. For many substances, like those that disrupt the hormones in our bodies, it is not even possible to establish a “safe level”. Another problem is that it is impossible to get accurate information on chemical exposure, not to mention combined exposures from different sources.

By looking mainly at chemicals’ intrinsic hazards, Madame President, you could dramatically decrease the number of burdensome and unreliable risk assessments and save valuable time. And money. The societal costs of hazardous chemicals – including healthcare, water and soil remediation, and so on – are estimated to be tens of trillions of euros per year.

2. Enable a circular economy

Today’s chemicals legislation is not adapted for a successful circular economy. Many harmful chemicals are unregulated and widely used in all kinds of everyday items. As these items are the very same ones we recycle and turn into new products, this also means we are recycling their toxic contents. But companies don’t want to use toxic material, even if it is recycled.

Extending the Generic Risk Approach would swiftly boost the market for toxic-free recycled materials. Why? Because it would drastically increase companies’ trust in recycled materials and their willingness to use them in new products. If we don’t detoxify our material streams, we will just continue with the circle of pollution.

Don’t miss out!

Subscribe to our newsletter.

3. Unlock the market for safer alternatives

When companies are unsure of when harmful substances will be restricted, it is difficult for them to plan ahead. This uncertainty slows down innovation and growth. Without clear phase-out deadlines, companies waste time and money constantly adjusting to changing rules instead of being able to plan for long-term solutions.

The way to provide this much-needed predictability, Madame President, is to have restrictions with fixed phase-out dates set by the authorities and applying to all companies. This makes it easier for companies to prioritise their resources and proactively substitute the most harmful substances. This approach not only boosts the EU economy, it also [unlocks the market](#) for safer products while promoting innovation and investment.

4. Create a level playing field

If regulations are inconsistent, some companies may gain an unfair advantage by continuing to use harmful chemicals while others invest in safer alternatives. This creates an uneven competitive environment and hampers sustainable innovation.

Simpler and faster restrictions would create a level playing field among EU companies. It is also the best way to deal with hazardous chemicals entering the EU through imported goods.

In short, Madame President, if your aim is to simplify REACH, then extending the use of the Generic Risk Approach to all the most harmful substances is the way to go. The blueprint to do so is already laid out in the Chemicals Strategy for Sustainability.

It is just a matter of following through.

Wishing you all the very best for your second presidency,