Introduction

The EEB welcomes the updated proposal for extending REACH information requirements presented by the JRC at the CARACAL 44 meeting. The Commission committed in the CSS to update the standard information requirements under REACH to allow hazard identification and risk management, in particular for the critical hazards. In this respect, it is essential that the revision of the information requirements ensures that the new information requirements fully match with the criteria for classification in CLP for all chemicals. The Commission should ensure that the updated information requirements fully cover the criteria for the new hazard classes to be implemented in CLP (endocrine disruptors, persistent/bioaccumulative and persistent/mobile substances). The registration dossiers must contain all information required for hazard identification (classification, SVHC identification) in order to achieve a successful revision of REACH. This should be a priority for the REACH revision.

Comments

- Merging Annex VII and VIII will be an important improvement to the information available for low tonnage chemicals. We support that a CSA be required for low tonnage chemicals as well.

- We also welcome the inclusion of a long-term aquatic invertebrate test in Annex VII, this provides valuable information for the aquatic hazard assessment of the low tonnage chemicals.
• We are concerned that the data requirements for the new hazard classes to be introduced in CLP are not yet covered adequately in the proposals. It is of ultimate importance that the updated information requirements match the criteria for the new hazard classes to be implemented in CLP for endocrine disrupting chemicals, as well as persistent/bioaccumulative and persistent/mobile chemicals.

• With respect to the use of NAMs, we note that NAMs can be and are already used for classification purposes for certain endpoints provided that the NAMs have been validated under the OECD programme. As a matter of principle, NAMs that have not been validated under the OECD validation programme, should never be accepted for not prioritising or not classifying chemicals.

• Revision of the CLP criteria will be needed for other endpoints before animal tests can be replaced by NAMs. This will involve accepting a lower level of evidence for the purpose of classification by authorities and industry. A change that needs to take place for CLP as well as GHS at the global scale.

• As long as animal tests are needed for classification, they should be included as standard information requirements in the REACH Annexes. In that sense sub-options B, the low testing scenarios, are not acceptable as they do not match the data criteria for CLP.

• Therefore, we have a preference for the scenario combining sub options 1A and 3A, as this combination will provide the best protection of people and the environment. Although this combination may be more resource intensive as regards testing requirements, these short term costs should be balanced against the benefits in the longer term. As such the impact assessment should give due consideration to the efficiency gains in the follow-up processes of REACH (evaluation and authorisation/restriction) as well as the long term benefits for human health and the environment.

Detailed NGO comments provided earlier to CARACAL can be found [here](#).