



EEB

European
Environmental
Bureau

TRANSLATING LOBBY SPEAK

WHAT CHEMICAL INDUSTRY'S
'SIMPLIFICATION' PLAN REALLY MEANS



The European Environmental Bureau (EEB) is the largest network of environmental citizens' organisations in Europe. It unites 185 civil society organisations from 41 countries, working for a better future where people and nature thrive together.

April 2025

Authors:

Dolores Romano, Policy Manager for Chemicals, European Environmental Bureau.
Tatiana Santos, Head of Chemicals Policy, European Environmental Bureau.

Contact: chemicals@eeb.org

European Environmental Bureau (EEB) AISBL
Rue des Deux Eglises 14-16 1000 Brussels,
Belgium +32 (0)2 289 1090 eeb@eeb.org
eeb.org meta.eeb.org

INTRODUCTION

The European Chemical Industry Council (CEFIC) recently published a 10-Point action plan to simplify REACH. Their stated aim is to “bring forward concrete proposals to simplify rules, streamline processes, and foster innovation, all while upholding robust standards for safety and environmental protection”. Ironically, however, implementing CEFIC’s proposals could result in more complex and burdensome rules. Rather than driving innovation, the plan seeks entrenching the status quo—or worse, taking us back to a pre-REACH era of weaker regulation and less competitiveness.

CEFIC is one of Brussels’ biggest lobby groups in Europe, so it’s no surprise that this powerful lobby sector has managed to secure a European Commission commitment to “simplifying REACH”. It’s worth remembering that REACH has helped the EU chemicals industry thrive and lead the world on chemicals management and that CEFIC’s analysis on hurdles to competitiveness didn’t mention REACH even once. In fact, CEFIC estimates that the total competitiveness cost of all environmental regulations is just 3%, with REACH accounting for only about 1%. This pales in comparison to energy costs, which range between 30% and 40%.

It is true that REACH requires companies aiming to market chemicals in Europe to provide safety data information that is critical for proper chemicals control. Also, the implementation of REACH has created a burdensome system for authorities and society, that is unnecessarily delaying the regulation of hazardous chemicals.

However, the Commission has ensured that simplification measures may under no circumstances lead to deregulation and they should not only ease the burden on industry, but also target administrative burden for people, businesses and administrations.

Also, the Commission’s Better Regulation Guidelines confirm that any revision of existing legislation should aim to “simplify and eliminate unnecessary regulatory burdens, **while achieving the underlying policy objectives**”. Simplifying REACH must, therefore, first and foremost support the primary objective of ensuring a high level of protection.

The headings of CEFIC’s proposed actions to simplify REACH appear aligned with this objective. They talk about simplification, predictability, dialogue, holistic strategies, uptake of reliable animal-free safety assessments, smoothening processes, or ensuring rules are enforced and enforceable. CEFIC also persistently supports the implementation of the Green Deal. However, a closer look at the specific impact of their proposals reveals that **all of CEFIC’s proposals will actually weaken chemical protections** and hinder the objectives of the European Green Deal (EGD) and its Chemicals Strategy for Sustainability (CSS) to improve the protection of people and the environment while innovating for safe and sustainable chemicals.

This document intends to explain to non- REACH experts the changes CEFIC is proposing, assess whether these align with the Green Deal goals and commitments, and examine their potential impact. Finally, we present the EEB’s proposals to address the issues CEFIC highlights as needing improvement in REACH, including reducing burdens on both authorities and companies, while addressing the urgent environmental and health challenges posed by hazardous chemicals.

SUMMARY TABLE

ACTION	 CEFIC'S ASKS EXPLAINED	 EGD/ CSS CHECK	 IMPACT
1	Increase its influence Stall EGD initiatives Voluntary schemes vs regulation		DEREGULATION
2	Add an additional process to influence, stop or delay regulatory processes.		DEREGULATION
3	Weaken regulation, by reducing the number and uses of highly hazardous chemicals that would be phased out and introducing voluntary schemes.		DEREGULATION
4	Stall the phase-out of most hazardous substances in consumer and professional uses.		TO STOP REGULATORY PROGRESS
5	Further delay the generation of information on the hazards (registration) of polymers, the building block of plastics.		TO STOP REGULATORY PROGRESS
6	Stall the proposal to address impacts on health and the environment due to the exposure to mixtures.		TO STOP REGULATORY PROGRESS
7	Further delay complying with their obligation to provide updated and reliable information on the hazards of the chemicals they market.		DEREGULATION
8	Stop using animal tests that are needed to identify if chemicals are hazardous.		DEREGULATION
9	Less legal data requirements, making the identification of harmful chemicals even more difficult.		DEREGULATION
10	To stop regulating chemicals by making enforceability a decisive criterion. To target enforcement of imports and set aside enforcement of EU companies	PARTLY	DEREGULATION

WHAT CEFIC SAYS

CEFIC ACTION 1: ENSURE SIMPLIFIED RULES THAT ALIGN WITH EUROPE'S POLITICAL GUIDELINES AND COMPETITIVENESS OBJECTIVES

CEFIC's proposal: Engage in dialogue with industry to understand its needs. Update the previous impact assessment to integrate the changed economic circumstances and regulatory burdens. Assess what can be improved under the current system versus introducing new initiatives. Explore additional options for simplification within other EU legislations governing chemicals.

The result: A simplified regulatory framework that is aligned with the European Commission's political guidelines. Identification of quick wins that can be achieved under the current acquis. A regulatory system based on reality checks, trust and incentives rather than "detailed control".

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Industry has used the complexity of REACH to justify their lack of compliance with the rules and for delaying the identification and regulation of the most hazardous chemicals. Poor implementation of REACH has resulted in highly burdensome regulatory processes, especially for authorities. Industry often frames regulation as a major burden and a key challenge for competitiveness. However, as noted above, the real barrier to competitiveness is high energy costs, which are ten times higher than regulatory costs.

CEFIC'S REAL ASKS



To further increase its influence (dialogues) on policies meant to protect people and the environment from impacts of the chemicals they market.

Stalling new initiatives, this is, the reforms proposed under the Chemicals Strategy for Sustainability.

Deregulation: chemicals policy based on voluntary schemes (trust and incentives) instead of on "detailed control".

IMPACTS



DEREGULATION AND HALTED REGULATORY PROGRESS

Increased exposure of people and the environment to hazardous chemicals, leading to reduced protection for health and the environment.

GREEN DEAL ALIGNMENT?



NO

They are asking to avoid the new initiatives committed to by the Chemicals Strategy for Sustainability

EEB'S PROPOSALS



Reducing administrative burdens within the REACH framework—particularly for SMEs— can be achieved without compromising high levels of protection for human health and the environment. Streamlining processes, applying new methods and approaches, and improving data management can uphold strong regulatory standards while alleviating the burden on both authorities and industry.

See our briefing [Simplifying REACH for industry and authorities.](#)

WHAT CEFIC SAYS

CEFIC ACTION 2: INCREASE PREDICTABILITY FOR REGULATORY RISK MANAGEMENT

CEFIC's proposal: An upfront analysis of available data on chemicals would help to identify priority substances and uses for which regulatory control is needed.

The result would be a clear regulatory plan which enables authorities to align actions under REACH or other legal frameworks, maximises resources across the EU and Member States, and facilitates discussions on strategic applications of chemicals.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Chemicals industry fear initiatives from member states and the Commission to phase out most hazardous chemicals under REACH. For example, they strongly oppose the proposal from five countries to ban PFAS.

An upfront analysis of available chemical data is challenging, burdensome, and slow due to the general lack of compliance and incomplete data provided by the industry. On average, these analyses take one year and eight months.

CEFIC'S REAL ASKS



Despite complaining about complex processes elsewhere, they now seek to add an additional step (upfront analysis) to the existing regulatory system. This would allow them to influence and stop or delay regulatory actions initiated under REACH by the Commission and national authorities, while pushing for the prioritisation of "other legal frameworks".

IMPACTS



DEREGULATION

The impact will be increased complexity and further delays in regulatory processes. It already takes nearly two decades on average to identify and ban hazardous chemicals in Europe!

This additional step would add to the burden on authorities and increase the likelihood of chemicals being regulated under weaker frameworks than REACH.

GREEN DEAL ALIGNMENT?



NO

The CSS is committed to simplifying and consolidating the legal framework. Adding an additional assessment process only increases complexity, which directly contradicts the CSS's goals.

EEB'S PROPOSALS



Speed up regulatory processes in REACH by improving its implementation (sticking to the rules!), extending fast track bans for consumer and professional uses of the most harmful substances, regulating groups by default and not granting derogations for non-essential uses.

Clear indications from authorities that the law must be respected, and that the most hazardous chemicals will be phased out, will provide industry and investors with the predictability they need for their investments.

See our briefing [Ensuring a Future-Proof EU Chemicals Policy](#).

WHAT CEFIC SAYS

CEFIC ACTION 3: IMPROVE THE AUTHORISATION AND RESTRICTION PROCESSES

CEFIC's proposal: Have a strategic discussion at EU level before restriction proposals are submitted to the system (see action 2). Limit the use of the authorisation scheme by adjusting the prioritisation criteria and creating more possibilities for granting exemptions when risks are adequately controlled. Clarify and tailor the required information submitted in the application for authorisation. Go back to the original intent of the restriction process i.e. take action when unacceptable risk is identified and restriction is the most suitable approach (see action 2). Exclude chemicals used in the manufacturing processes (intermediates) from the scope of restrictions that are seeking to phase out chemicals. The primary focus of restrictions should be consumer use, final goods and end uses. Implement more flexible derogations, with review periods to account for timing of alternative development. Have a robust and transparent framework for grouping chemicals that require regulatory action.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Following the CSS commitment to address the pressing environmental and health concerns posed by harmful chemicals, authorities have advanced more group restrictions (e.g. PFAS, bisphenols, phthalates) instead of regulating them one by one. This approach accelerates protection and helps prevent regrettable substitution.

However, industry producing these toxic chemicals has responded by massively lobbying authorities, leading to lengthy discussions and significant delays.

The authorisation process —intended to phase-out substances already known to be of very high concern (SVHC) such as carcinogens or reprotoxicants—has suffered from flawed implementation. As acknowledged by the General Court, this has increased the regulatory burden on both authorities and companies, ultimately delaying the phase out of harmful chemicals from the market.

CEFIC'S REAL ASKS



To delay the phase out of hazardous chemicals by weakening the existing REACH regulatory system by:

- Adding new steps to the regulatory process (see Action 2).
- Reducing the number and uses of highly hazardous chemicals to be subject to phase-out under the authorisation process (*adjusting the prioritisation criteria*), while increasing permits to continued use (*exemptions*).
- Reducing the number of chemicals and uses that would be banned through the restriction process by avoiding group-based regulation and excluding industrial uses—even though these account for the majority of emissions (e.g. over 50% of PFAS emissions come from industrial uses).
- Promoting voluntary schemes (*flexible derogations*) instead of mandatory regulations.

IMPACTS



DEREGULATION

Increased complexity in decision-making for authorities (e.g. through flexible derogations), reduced predictability for companies due to uncertain phase-out timelines, and increased exposure and impacts to people and the environment to hazardous chemicals that would remain unregulated.

GREEN DEAL **NO**
ALIGNMENT?



This approach clearly contradicts the CSS commitment to advancing restrictions through grouping instead of regulating them one by one.

EEB'S
PROPOSALS



Striking a Balance: streamlining REACH Authorisation and Restriction while ensuring strong health and environmental protection

Strict regulation, underpinned by clear, transparent processes, timelines, and deadlines, is a key incentive for companies to replace hazardous chemicals with safer alternatives. To achieve this balance, the following actions are essential:

- Ensure proper implementation of existing rules.
- Expand and apply Generic Risk management Approach (GRA) more broadly.
- Group chemicals and uses by default for both restriction and authorisation.
- Improve and provide earlier access to information on hazards, uses and alternatives.
- Avoid exemptions, derogations, or authorisations for non-essential uses.

See our briefing [Ensuring a Future Proof EU Chemicals Policy](#).

WHAT CEFIC SAYS

CEFIC ACTION 4: AVOID OVERLY SIMPLISTIC ASSESSMENTS - USE TARGETED RESTRICTIONS INSTEAD

CEFIC's proposal: Do not add more semi-automatic links between hazard classification and regulatory measures. Regular restrictions, including full-fledged risk and socio-economic assessments, ensure a balanced as well as evidence and science-based approach to regulate the most severe hazards (SVHCs). This would provide a more targeted response, while also addressing regulatory and societal needs without overregulating.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



The Generic Risk management Approach (GRA), already used in legislation on toys, cosmetics, and worker protection, aims to prevent exposure to highly hazardous chemicals in everyday products by regulating entire categories of substances—such as carcinogens, mutagens, and reprotoxicants. This approach avoids the need for lengthy, burdensome, and unrealistic substance-by-substance risk assessments, which would take centuries to implement.

GRA is the fastest way to reduce people's exposure to hazardous chemicals and ensure clean materials—an essential foundation for a safe circular economy. In line with the CSS commitments, authorities aim to expand this approach to cover more categories of the most harmful chemicals—such as endocrine disruptors, neurotoxicants, immunotoxicants, and persistent, bioaccumulative, or mobile substances. They also seek to include professional uses, like those by painters or hairdressers, who often lack the capacity to fully understand and manage chemical risks.

CEFIC'S REAL ASKS



TO STOP REGULATORY PROGRESS

Industry seeks to stall REACH's fast-track system (GRA) for phasing out hazardous chemicals in consumer products by opposing the inclusion of new classes of harmful substances, such as endocrine disruptors (EDCs). Instead, they advocate for outdated, slow and burdensome substance-by-substance risk assessments for each specific use—delaying action and weakening protection. They also favour the 'normal' restriction process from the pre-REACH era—despite the Commission having deemed it ineffective and overly burdensome over 20 years ago, which was a key reason REACH was created. In short, CEFIC is pushing to take us back to a pre-REACH regulatory system.

IMPACTS



Continued **exposure** of **people** and the **environment** to the most hazardous chemicals present in daily life products.

Continued presence of **hazardous chemicals** in materials and articles hampering **circular economy**.

GREEN DEAL ALIGNMENT?



NO

The CSS explicitly committed to extending GRA to ensure that, as a rule, consumer products - including food contact materials, toys, childcare articles, cosmetics, detergents, furniture and textiles- do not contain the most harmful chemicals.

It also aims to extend the same level of protection to professional users as is granted to consumers.

EEB'S PROPOSALS



GRA should be extended to cover all the most harmful chemicals in mixtures and articles intended for both the general public and professional users. This approach streamlines regulation, reduces administrative burdens, and accelerates decision-making—making it less resource-intensive for all stakeholders. It also provides greater clarity and predictability for industry by setting clear criteria for action, helping to avoid investments in unsustainable, short- sighted alternatives. Additionally, the right to initiate GRA actions should be extended to Member States to speed up regulation and enhance effectiveness. See our briefing [Ensuring a Future Proof EU Chemicals Policy](#).

WHAT CEFIC SAYS

CEFIC ACTION 5: AVOID ADDITIONAL REQUIREMENTS FOR POLYMERS - DEVELOP A HOLISTIC STRATEGY FIRST

CEFIC's proposal: Before taking any action on polymers, a clear problem definition for polymers resulting in a coherent, holistic strategy is needed to streamline the regulatory approach for polymers, ensuring alignment with simplification and burden-reduction goals, while also tackling the identified problems.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Polymers are chemicals that are produced and used in extremely high volumes -around 50 millions of tonnes annually- and are widely used in plastics, paints, resins, and cosmetics, leading to broad exposure for people and the environment.

However, polymers are a major blind spot in chemical safety. There is very limited information on their hazards and uses, leaving authorities, downstream users, workers and waste handlers largely in the dark about potential risks.

Although polymers were exempted from REACH registration in 2007, the legal text mandated the Commission to assess the need for a proposal on which polymers should be registered. Since then, three studies ([RPA, 2012](#); [BIO, 2015](#) and [Wood & PFA, 2020](#)) have been published by the Commission. All of them have consistently shown that the societal benefits of regulating polymers outweigh the costs to companies by a factor of 2 to 6. Also, based on these findings, a group of experts -including authorities, industry and academia- developed a concrete proposal for polymer registration, which should now be integrated into the REACH reform.

CEFIC'S REAL ASKS



TO STOP REGULATORY PROGRESS

CEFIC is pushing to further delay the requirement to provide essential information on the hazards and uses of polymers through REACH registration.

IMPACTS



Authorities and companies across the supply chain will remain in the dark about the risks posed by polymers—likely for at least another decade, as further legislative revisions are unlikely in the near future.

This continued lack of information will result in ongoing exposure of people and the environment to hazardous chemicals, while also undermining innovation and delaying progress toward a clean and safe circular economy.

GREEN DEAL ALIGNMENT?



NO

The CSS committed to proposing an extension of the REACH registration duty to include certain polymers of concern.

EEB'S PROPOSALS



To ensure the availability of hazard and use information for polymers, REACH should establish a notification system for all polymers. This system would provide basic data to facilitate the grouping of polymers for registration. A stepwise registration process, with clear deadlines, should prioritise "high-risk" polymers—those with molecular weights below 1500 Da and those produced in highest volumes for plastic manufacturing, which contribute significantly to the widespread exposure to micro- and nano-plastics.

See our [FAQ on polymer registration](#).

WHAT CEFIC SAYS

CEFIC ACTION 6: AVOID INTEGRATING MAF IN REACH

CEFIC's proposal: Existing measures seeking to reduce emissions to the environment i.e. Industrial Emissions Directive, Urban Waste Water Treatment Directive, or assessing real-life combined exposures, i.e. Water Framework Directive and Chemicals Agents Directive, offer more targeted and impactful ways to address harmful combined exposures.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Humans and the environment are daily exposed to mixtures of multiple substances. Scientific evidence shows that the combined effects of these substances can add up—or even multiply—posing greater risks than individual substances alone. Although REACH places the responsibility on industry to ensure that their chemicals do not harm health or the environment, registrants only assess their own substances in isolation, ignoring real-world co-exposures.

To close this gap, authorities have proposed the use of a Mixture Assessment Factor (MAF)—a practical and protective tool to better account for combined exposures. However, CEFIC opposes the introduction of MAF, as it would likely reveal additional substances that pose risks and would require further regulatory action to protect health and the environment.

CEFIC'S REAL ASKS



TO STOP REGULATORY PROGRESS

To stall the proposal to address impacts on health and the environment due to the real-life exposure to mixtures of chemicals.

IMPACTS



Health and environmental risks from daily co-exposure to chemical mixtures will remain unaddressed.

Identification and regulation of hazardous chemicals will be further delayed, allowing continued harm and undermining public and environmental protection.

GREEN DEAL ALIGNMENT?



NO

The CSS committed to exploring how best to introduce mixture assessment factor(s) into REACH to account for the combined effects of chemical exposures in risk assessments.

EEB'S PROPOSALS



Introduce a Mixture Assessment Factor (MAF) into REACH chemical safety assessments to identify cumulative risks that might otherwise be missed. This approach streamlines and simplifies the risk evaluation process by avoiding complex, substance-by-substance assessments and ensures better protection of human health and the environment.

WHAT CEFIC SAYS

CEFIC ACTION 7: ENSURE A CONTINUOUS DIALOGUE BETWEEN INDUSTRY AND ECHA DURING DOSSIER EVALUATION PROCESS

CEFIC's proposal: An open dialogue and agreeing with ECHA in advance are key for the smooth updating or development of new registration dossiers.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Industry has consistently failed to meet its legal obligation to provide accurate and up-to-date hazard information for the chemicals it markets or imports. Authorities' checks reveal a persistent lack of compliance—with 80% of evaluated registration dossiers found to be deficient—resulting in significant delays in hazard identification and risk management. This widespread non-compliance overloads ECHA, drains resources, and leaves people and the environment unnecessarily exposed to potentially toxic chemicals for years.

Currently, REACH registrations function as open-ended licenses to market, offering little incentive for companies to update their dossiers—many of which haven't been revised since first submitted in 2010.

CEFIC'S REAL ASKS



To further delay (*dialogue with ECHA*) regulatory action, ultimately avoiding their legal obligation to provide updated, reliable hazard information for the chemicals they place on the market.

IMPACTS



DEREGULATION

Continued use and widespread exposure to chemicals without reliable hazard information, leaving authorities and downstream users in the dark. This undermines effective risk management, hampers innovation, and stalls progress toward a safe, sustainable and circular economy.

GREEN DEAL ALIGNMENT?



NO

The CSS clearly commits to **zero tolerance for non-compliance**, aiming to reinforce the principles of “no data, no market” and “polluter pays” under REACH. This includes requiring full compliance of all registration dossiers and revoking registration numbers in cases of non-compliance—a direction directly undermined by industry's efforts to delay.

EEB'S PROPOSALS



Reinforce the No data - No Market principle. Registrations should be rejected in case dossiers fail to meet legal information requirements.

Empower ECHA to revoke registration numbers in cases non-compliance, including failure to update dossiers or follow evaluation decisions.

Hold registrants financially accountable for the costs caused by non-compliant dossiers.

Implement a dossier expiration date to ensure relevant updates and ongoing compliance.

WHAT CEFIC SAYS

CEFIC ACTION 8: INTRODUCE A NEW SAFETY ASSESSMENT SCHEME THAT SUPPORTS AN INCREASED UPTAKE OF RELIABLE ANIMAL-FREE SAFETY ASSESSMENT METHODS (NEW APPROACH METHODOLOGIES OR 'NAMS')

CEFIC's proposal: Reduce the hazard focus of REACH, allowing more flexibility in achieving a high degree of safety. Remove default requirements for animal testing wherever possible. Regulators should justify why concerns cannot be addressed using exposure-based approaches or NAMS, such as when rejecting proposals for read-across, grouping, or NAMS to avoid animal tests. Adapt data requirements to utilise NAMS together with exposure considerations: a chemical can only cause harm if it can reach a target and interact with it.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



Animal testing is currently necessary to identify serious health hazards such as carcinogenicity, reproductive toxicity, or endocrine disruption. Unfortunately, reliable and standardised New Approach Methodologies (NAM) to replace animal testing have not yet been developed and validated for all health endpoints. Authorities cannot regulate the most hazardous chemicals without animal-based evidence. ECHA, together with the Commission and member states, are leading efforts to advance and validate new methods to reduce animal testing.

REACH places the burden of proof on companies, requiring them to provide safety data for the chemicals they place on the market.

CEFIC'S REAL ASKS



DEREGULATION

To stop using animal tests that are currently necessary to identify whether chemicals are hazardous, shift towards exposure-based assessments (rather than hazard identification), and transfer the burden of proof from companies to authorities (Regulators should justify why concerns cannot be addressed using exposure-based approaches or NAMS)—undermining REACH's core principle of “no data, no market.”

IMPACTS



Nobody wants unnecessary use of animals in lab testing, but currently, without them, chemical hazards such as carcinogenicity, toxicity to reproduction or endocrine disruption would not be identified. People and the environment would be exposed to highly hazardous chemicals. Authorities, and supply chain actors would lack the information needed to ensure safe use, enable a clean circular economy and drive innovation. Shifting the burden of proof to authorities would further overload already stretched resources, making it harder to enforce legal requirements and protect public health.

GREEN DEAL ALIGNMENT?



NO

The CSS explicitly aims to improve the availability of hazard chemical data by, among other measures, amending REACH information requirements. This includes ensuring the generation of sufficient data to effectively identify substances with critical hazardous properties—something that would be undermined by removing testing obligations or shifting the burden of proof away from industry.

EEB'S PROPOSALS



Gradual transition to NAMS without compromising the protection of human health and the environment:

- Update REACH information requirements to ensure the effective identification of carcinogens, mutagens, reprotoxicants, endocrine disruptors, and substances with high persistence, bioaccumulation, or mobility.
- Develop and implement an EU strategy for test methods and validation of New Approach Methodologies (NAMS).
- Implement a precautionary approach: Use NAMS to identify hazardous chemicals and reduce animal testing, but not to downplay or deprioritise potential risks to enable the gradual transition towards non-animal testing, without compromising the protection of human health and the environment.

WHAT CEFIC SAYS

CEFIC ACTION 9: SMOOTHEN THE REGISTRATION PROCESS

CEFIC's proposal: Simplify data requirements by improving the use and effectiveness of adaptations to the standard information requirements and allowing data waiving under Annex XI. Allow targeted updates of registration dossiers. Put a freeze on updating IT formats for registration dossiers.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



The high level of non-compliance of the registration dossiers (80% of checked dossiers) is a major bottleneck in the REACH process. This overloads the evaluation system, draining ECHA resources and delaying hazard identification and risk management measures. As a result, people and the environment remain exposed to potentially toxic chemicals for extended periods.

The current REACH text prevents ECHA from assessing the adequacy and reliability of data during the completeness check, allowing substances with poor quality data on the market. This undermines the no data – no market principle.

CEFIC'S REAL ASKS



Reduced legal data requirements, which would further complicate the identification of hazardous chemicals.

IMPACTS

DEREGULATION



Delays in identifying the hazardous properties of substances would prolong people's and the environment's exposure to potentially toxic chemicals. Authorities and supply chain actors would lack crucial information needed to ensure safe use, promote a safe circular economy, and drive innovation toward safer substances and materials.

GREEN DEAL ALIGNMENT?



NO

The CSS aims to improve the availability of chemical data by, among other measures, amending REACH information requirements **to enable an effective identification** of substances with critical hazardous properties.

EEB'S PROPOSALS



Strengthen the registration process.

Allow the assessment of adequacy and reliability of data in registration dossiers at the time of registration and reject clearly non-compliant dossiers.

Update REACH information requirements to enable efficient and effective identification of all critical hazards, including carcinogens, mutagens, reprotoxicants, endocrine disruptors, and persistent chemicals, both mobile and bioaccumulative.

WHAT CEFIC SAYS

CEFIC ACTION 10: ENSURE RULES ARE ENFORCED AND ENFORCEABLE

CEFIC's proposal: Enforcement and enforceability must be considered at the very beginning and throughout all stages of the decision-making process. The ECHA Enforcement Forum should have a stronger role and voice when it comes to enforceability assessment; if enforceability gaps are identified, the European Commission should find a solution to how to solve it e.g. launching a CEN request for harmonised test method development, ensuring there is laboratory capacity to check imports. Online platforms should become legally responsible and be considered as a responsible economic operator.

EXPLAINER: WHAT IT REALLY MEANS

THE ISSUE



There is a high level of non-compliance with EU chemical laws among inspected imported products, but also among European companies. For instance, 40% of companies inspected in an EU enforcement project on the compliance with the REACH Authorization regime were found non-compliant. The level of non-compliance with registration obligations remains over 80%.

Enforcement of chemicals laws is weak, it affects all environmental legislation, regardless of complexity, and has from multiple root causes. Enforcement authorities often lack the necessary resources to control and sanction violations. Additionally, the absence of harmonised EU REACH enforcement provisions discourages action, leaving European companies with little incentive to comply.

CEFIC overlooks the widespread non-compliance pattern among European companies and downplays the broader issue of insufficient enforcement across the board.

CEFIC'S REAL ASKS



CEFIC wants to make enforceability a decisive criterion for regulating chemicals. This would delay or even stop regulatory measures, as it would amount to making regulation conditional upon the capacity and willingness of actors to comply. No regulation could ever be 100% enforceable.

CEFIC wants enforcement to target imports while they seem to request a card blanche for European companies, i.e. in CEFIC's words "a regulatory system based on reality checks, trust and incentives rather than "detailed control" (Action 3).

IMPACTS

DEREGULATION



Make enforceability a decisive criterion would stall or further delay restricting hazardous chemicals.

Shifting ever more enforcement resources from domestic activities to imported goods would reduce incentives for EU companies to be compliant and let CEFIC off the hook.

GREEN DEAL **PARTLY**
ALIGNMENT?



The CSS committed to a wide range of measures to ensure zero tolerance for noncompliance, including on-line sales, imported articles, but also classification and labelling and restrictions. It does not consider making enforceability a decisive criterion for regulating chemicals.

EEB'S
PROPOSALS



Non-compliance is unacceptable, whether for imports or domestic products. Enforcement activities across the EU must be harmonised by clearly defining Member States' responsibilities regarding controls, and minimum penalties for violations. The Commission should regularly audit Member States' capacities to ensure effective implementation.

While enforceability gaps should never serve as a justification for delays in regulatory control. Enforcement could be more broadly supported by setting harmonised, stricter and clearer regulatory conditions, or by facilitating the exchange of information across industry sectors to support companies that struggle with compliance.

We agree with CEFIC that "Online platforms should become legally responsible and be considered as a responsible economic operator."



EEB

European
Environmental
Bureau

#ToxicFreeFuture

A thick, horizontal green brushstroke underline is positioned directly beneath the hashtag text, adding a dynamic, hand-drawn feel to the design.