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DEBUNKING CEFIC'S "SIMPLIFICATION" AGENDA: WHEN SIMPLIFICATION MEANS WEAKENING REACH

INTRODUCTION

The European Chemical Industry Council (CEFIC) argues that REACH is fundamentally "fit for purpose" and that Europe's chemicals legislation already ensures a high level of protection for human health and the environment. In this view, the main challenges faced by the sector stem not from the design of REACH itself, but from implementation and enforcement, and can therefore be addressed through administrative simplification without reopening the core legal text.

CEFIC further claims that its proposed measures would reduce regulatory burden, strengthen competitiveness, and improve the efficiency of the system, while maintaining existing standards of protection. This narrative aligns with calls to simplify REACH in order to support industrial resilience and investment in Europe's chemical sector.

Against this broader policy and scientific context, a leaked document sheds further light on CEFIC 's public calls for simplification addressed to the Commission.

While presented as technical improvements to implementation, many of the proposed measures would in practice weaken key safeguards embedded in REACH, including those designed to ensure transparency, generate hazard data, and enable timely regulatory action.

This analysis therefore aims to explain what CEFIC proposals actually mean and the consequences on health and environment if adopted.

CEFIC'S PROPOSAL	WHAT DOES THIS REALLY MEAN	WHAT WOULD BE THE CONSEQUENCES
BEEF-UP ECHA'S INTEGRATED REGULATORY STRATEGY AND MAKE IT THE CENTRAL PROCESS FOR IDENTIFYING REGULATORY RISK CONTROL. Use ECHA's assessment of regulatory needs as a basis to prioritise which chemicals should be regulated, develop prioritisation criteria, integrate common data platform to develop a workplan across different legislations	Today member states or the Commission through ECHA can propose to restrict chemicals when they find that they pose risks to people or the environment that are not controlled. ECHA has identified chemicals and groups of chemicals that need to be regulated and recommends different risk management measures (typically under REACH or CLP). CEFIC is trying to delay the regulation of these chemicals by proposing new prioritisation and assessment steps. They want to have a say in regulatory strategizing, based on use and exposure information that only industry can provide, while pushing for less protective regulatory frameworks such as IED or OSH. CEFIC and other industry actors have proposed this also for the revision of REACH as mandatory "upfront analysis" and mandatory Risk Management Option Analysis (RMOA).	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. If prioritisation depends on data that industry voluntarily makes available, this would bring them into a convenient gatekeeper position, with little incentive to share all they know on the hazards and risks. This additional step would add to the burden on authorities and increase the likelihood of chemicals being regulated under weaker frameworks than REACH. CEFIC's position (published), that measures under IED and OSH are considered as the default, and REACH restrictions could only be imposed as complementary measures, will undermine the phase-out of the most harmful substances and hamper the transition to a circular economy.

CEFIC'S PROPOSAL	WHAT DOES THIS REALLY MEAN	WHAT WOULD BE THE CONSEQUENCES
WORK WITH ECHA TO IDENTIFY DAY-TO-DAY OPERATIONAL CHALLENGES LINKED TO REGISTRATION	To further delay (work with ECHA) regulatory enforcement action, ultimately avoiding their legal obligation to provide updated, reliable hazard information for the chemicals they place on the market. Industry's persistent and widespread non-compliance with its legal obligation to provide accurate and up-to-date hazard information for the chemicals it manufacturers or imports overloads ECHA, drains resources, and leaves people and the environment unnecessarily exposed to potentially toxic chemicals for years. Rather than creating new processes for negotiating implementation challenges, efforts should focus on ensuring compliance with existing legal obligations. ECHA's role is to independently regulate and enforce REACH, safeguarding human health and the environment, not to develop arrangements that could further delay or weaken industry's compliance responsibilities.	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.

CEFIC'S PROPOSAL	WHAT DOES THIS REALLY MEAN	WHAT WOULD BE THE CONSEQUENCES
FOCUS DATA REQUIREMENTS ON THEIR REAL ADDED VALUE FOR SAFETY ASSESSMENTS Annex XI, 1.2. Make weight of Evidence a decisive step adding NAMs and treatment of uncertainty Annex IX: allow more flexibility not to perform certain tests (sub-chronic toxicity and prenatal development toxicity studies) Involve industry in adjusting technical document on dosing and reproductive toxicity	CEFIC is asking to withdraw tests that are necessary for establishing if chemicals are hazardous. They also ask to extend the use of waivers and New Approach Methodologies (NAM), most of which have not yet been developed and validated for all health endpoints. This means shifting towards exposure-based assessments (rather than hazard identification) and transferring 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." Moreover, according to ECHA's latest five-year evaluation of REACH and CLP, weight of evidence approaches, read-across and other adaptations are among the main reasons for non-compliance in registration dossiers. ECHA found that many adaptations to standard information requirements lacked adequate scientific justification, did not fulfil the legal criteria set out in REACH, or did not provide sufficient information for reliable hazard assessment and classification. CEFIC's proposals would therefore place greater reliance on approaches that ECHA has repeatedly identified as requiring significant improvements in quality and compliance.	In summary they are asking for reduced legal data requirements, which would further complicate the identification of hazardous chemicals. Granting industry more discretion in deciding about the necessity of tests would moreover lead to enforcement challenges and shift burden to public authorities. Nobody wants unnecessary use of animals in lab testing, but currently, without them, critical chemical hazards such as carcinogenicity, mutagenicity, 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.

CEFIC'S PROPOSAL	WHAT WOULD BE THE CONSEQUENCES	WHAT DOES THIS REALLY MEAN
ALIGN THE PROPOSALS FOR RESTRICTIONS WITH ITS CURRENT AND FUTURE USE (extended scope, alternative to authorisations to gradually phase out SVHC)		CEFIC is asking to make regulation of chemicals even more complex and burdensome for authorities as it already is today. This would result in delaying regulations, and therefore continued exposure of people and the environment to the most hazardous chemicals. Continued presence of hazardous chemicals in materials and articles will also hamper reuse and recycling, this is, the circular economy. Downrating the importance of information on availability of alternatives in decision-making would label some chemicals, uses or sectors as critical forever. This is harmful for innovation and the EU's long-term competitiveness. It will put alternative providers at a permanent disadvantage. Business as usual is favored over innovation.
i) Annex XV "Proposal" header: Insert an obligation to include clear substance identifiers and overview of targeted uses	By asking for specific substance identifiers CEFIC is trying to avoid broader group restrictions such as the microplastics or universal PFAS restriction. They are also trying to reduce the scope of restrictions as many uses of hazardous chemicals are only known to authorities following the publication of the proposal, when industry asks for derogations during public consultations. The information on uses provided by industry in registration dossiers and during calls for evidence launched by authorities is very poor.	
ii) Annex XV "Justifications for restrictions at Community level": the restriction must be checked against other risk management options	Authorities already assess why their restriction proposal is the best option compared to other risk management measures. CEFIC is asking to increase the burden on authorities with additional assessments. They are also pushing for an additional "upfront analysis" and mandatory Risk Management Option Analysis (RMOA). CEFIC's intention is to shift the focus away from REACH's legally binding risk management measures and towards less stringent or voluntary approaches, delaying regulatory action and making it more difficult to implement effective restrictions where they are needed.	

iii) Annex XV" Socio-economic assessment": insert binding requirements for SEA and obligation to include a cost benefit-assessment of alternative risk management options	Authorities already assess socio-economic impacts of restriction proposals. CEFIC is asking to increase the burden on authorities with additional assessments.	
iv) Annex XVI: add criticality as an element to be considered in SEA	CEFIC is trying to achieve exclusions or broad derogations to sectors considered critical despite "critical" in this context does not equal essential for society (e.g. to ensure health and safety) and moreover ignores whether safer alternatives may be available for uses within the sector.	
v) Define criteria for systematically assessing and judging enforceability of a restriction proposal by the Enforcement Forum	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 authorities to enforce. No regulation could ever be 100% enforceable.	Authorities are in any case required to assess enforceability of proposed restrictions, and the Forum is consulted in each case. Already today, uncertainties about enforceability have delaying effects, see for example the long overdue restriction of certain sensitizers in textile and leather products. Making enforceability a more decisive criterion would stall or further delay restricting hazardous chemicals.