

2. juni 2021

Høringssvar til revision af REACH

Green Transition Denmark (GTD) welcomes the opportunity to provide feedback on the Commission's discussions of the revision of EU's REACH chemicals regulation. GTD is a Danish NGO working to promote a green and sustainable transition of society. We have many years of experience with the chemicals area and have especially focus on endocrine disrupters and other areas that are not covered by the REACH legislation. Many years of evidence has showed that REACH is not providing enough protection to people and environment, mostly due to the combination of a lack of safety data (incomplete dossiers) and an unwillingness to act on this limited data (no possibility to directly revoke registration numbers). This means that an exposure to a hazardous chemical can continue for many years even after the chemical has been recognized problematic in relation to REACH.

GTD backed up the commitments made in the Chemicals Strategy for Sustainability (CSS) for the strengthening of EU chemicals regulation. However, many of the commitments in that strategy are not found in this Inception Impact Assessment (e.g., 'including additional independent SVHC categories for EDC, PMT, vPvM'). Instead, more seems to be made policy options, which will not strengthen the chemicals legislation and others are not even mentioned.

This is a crucial opportunity to strengthen REACH legislation. We especially emphasize the importance of:

- Improve protection of people and the environment against hazardous chemicals (improve hazard identification through amendment of SVHC categories: EDC, PMT/vPvM; include mixture toxicity -> introduction of a Mixtures Assessment Factor)
- Increase transparency for public (reform Article 33 and make the information readily available -> remove the 45 days deadline)
- Increase regulatory control (revocation of registration numbers; introduce maximum validity of registrations – e.g., re-register every 5 years)
- Registration of polymers (all types of polymers should be included – priority should be given to the polymers to whom people and the environment are most exposed to due to their uses (plastics, textiles, paints, ect.))

We furthermore highly support the consultation responses from EEB and CHEMTrust, where extended comments and arguments can be found.