

Arguments and Positions

REACH Implementation

With the entry into force of the chemicals regulation REACH in 2007, the European chemicals policy was restructured and harmonised. The complex requirements are to be implemented by 2020 and far beyond. Building blocks of REACH are the registration, evaluation, authorisation and restriction of chemicals as well as the communication along the supply chain on the safe use of substances and mixtures.

All companies know the REACH principle: no registration - no marketing. Therefore, all stakeholders have worked with great care on the compilation of data. Much build-up work was done in the three registration phases to end November 2010, May 2013 and May 2018. So far, the European chemicals agency ECHA has received around 99,000 registrations for ca. 23,000 substances. Industry and public authorities have achieved many positive developments in the data situation and in REACH processes.

REACH has no expiry date

The workload remains high. Work focuses have shifted away from registration to dossier updates, evaluation, authorisation/restriction, and work on the extended safety data sheet.

The quality of registration dossiers is central. Therefore, the VCI and its member companies have an active role in the implementation of the multi-year "REACH Dossier Improvement Action Plan" of June 2019 of the European Chemical Industry Council (CEPIC).

The plan sets priorities and includes guidance for companies how to review their dossiers and adapt them to today's requirements, if necessary.

Prevent uncertainties and burdens

The authorities are identifying more and more substances important to the chemical industry (e.g. solvents and catalysts) as candidates for the authorisation procedure. The authorisation requirement brings uncertainties in planning, increases in costs and competitive disadvantages for products manufactured in the EU. The review of granted authorisations impairs the legal and planning certainty for investments. This can cause a withdrawal of substances and affect entire value chains.

Preserve competitiveness under REACH

Studies on the effectiveness of REACH show the positive effects on the protection of humans and environment. The companies have dedicated many personnel and high registration costs to this. Now, they are faced with additional costs, inter alia, through furthergoing information requirements within the evaluation procedure. It is important to preserve the competitiveness and innovation capability of the chemical and pharma industry with the REACH safety standards which are high in the international comparison. The question whether this can be done successfully can be assessed only in the EU Commission's next REACH report 2022.

THE VCI IS CALLING FOR THE FOLLOWING

■ No changes to the text of the Regulation - benefit from lessons learned

In its general report on REACH of March 2018, the Commission notes that REACH is and remains well-suited for achieving the protection goals of the REACH Regulation. Therefore, the Commission sees no need to change the enacting terms of REACH. Basically, this creates stable framework conditions that are needed for further implementation. Now, the public authorities and industry should make use of the lessons learned and jointly work to enhance the effectiveness, reliable planning and efficiency of the REACH processes and also to simplify them.

■ Support SMEs in further REACH implementation

Especially small and medium-sized chemical enterprises need practice-oriented solutions for the preparation of safety data sheets, so that these can become more easily understandable and usable.

■ Before including substances in the candidate list: check alternatives together with industry

By 2030, the authorities want to include all relevant SVHCs in the REACH candidate list for the authorisation procedure or in other regulatory procedures. Strict scientific criteria should apply in this process. For each individual substance, an analysis of the most suitable risk management options should be mandatory for the authorities. This should be implemented consistently and involve the impacted industry. As intended under REACH, exemptions should be granted for already specifically regulated uses. Authorisation applications should be simplified overall and, inter alia, for small volumes.