

Ten Green Points for REACH-Plus

- 1. Mandatory substitution of substances of very high concern if alternatives are available**

The use of chemicals of very high concern must not be authorised if their use is not essential to society or if safer alternatives are available. Authorisations must be time-limited.
- 2. More substances to fall under authorisation procedure**

Strong skin and respiratory sensitisers as well as chronically toxic substances should be added to the category of substances of very high concern subject to the authorisation procedure.
- 3. Ensure safety of all articles, including import articles**

The safe use of chemicals must be ensured for all consumer articles, irrespective of whether they are produced in the EU or imported. The use of substances of very high concern should be prohibited in consumer articles as soon as safer alternatives are available.
- 4. Improve Public Right to Know**

Public access to information about the use of chemicals needs to be improved with REACH, not reduced. Public knowledge about chemicals allows the public and third parties to make their own assessments, to compare with alternatives and to make informed purchasing decisions. The name of registrants, tonnage categories and exposure information must be non-confidential. Safety data sheets must be communicated through the whole manufacturing chain all the way to the end user. The public must be informed about the use of hazardous chemicals in consumer articles.
- 5. Use non-animal testing strategies**

Data sharing of animal tests and publication of the results must be mandatory in all circumstances, non-animal testing strategies should be used, and funding is needed to develop further non-animal methods. All animal test plans should be evaluated with public and expert scrutiny. The Agency should establish a strategic overview on the replacement of animal tests.
- 6. Introduce explicit Duty of Care by industry for all chemicals**

REACH only addresses 30.000 out of potentially 100.000 existing substances. We cannot turn a blind eye on the remaining chemicals. Industry should have an obligation to report that it has the necessary safety data to show that the intended uses of its chemicals do not adversely affect human health or the environment.
- 7. Register all substances of very high concern first**

Substances of very high concern should be dealt with as soon as possible. Substances that are persistent and bioaccumulative need to be added to those to be registered within the first phase.
- 8. Simplify registration by applying "one- substance, one registration"**

In order to avoid duplicate work and reduce costs, industry should be obliged to co-operate so as to register each substance only once.
- 9. Increase minimum data requirements**

The minimum data requirements must allow addressing the key concerns. Substances produced between 1 and 10 tonnes per year as well as isolated intermediates must have proper safety assessment (including information about biodegradability, non-animal acute toxicity and exposure).
- 10. Introduce quality check, a minimum number of evaluations of registration files and clear sanctions**

Industry will be responsible for the safety assessments of the chemicals they produce. These safety assessments include subjective evaluations. As industry also has a vested interest in the sale of its chemicals, a quality assurance and control system needs to be introduced. Data quality needs to be checked by an independent third party. A certain minimum of all registration dossiers must be evaluated. If there is no upstream data quality check, clear sanctions are needed to fully implement the principle "no data, no market". If the registration data is found to be inadequate, the registration number should be withdrawn, unless the data requirements are satisfied within a short period of time. If the safety assessment is found to be biased, restrictive measures should be taken.