

Position Paper on REACH, EU Regulation on Chemical Management

REACH is a key element of the EU's commitment towards the implementation plan adopted at the 2002 World Summit on Sustainable Development which aims to ensure that, by 2020, chemicals are produced and used in ways that lead to significant reduction of adverse effects on human health and the environment. The health and environment objective of REACH is expected to be achieved through:

- better knowledge on the properties and uses of substances resulting in better safety and control measures, reducing exposure and hence, the negative impacts on human health and the environment
- use of less dangerous alternative substances or technologies to SVHC.

In the 2013 REACH review, it is underlined that the level of compliance is important. It is mentioned that the European Commission (EC) intends to assist the competent authorities in enhancing in-house skills, e.g. by developing and sharing tools for the assessment of the impacts on the innovation and competitiveness. EC wants to spend more resources on knowledge-sharing between the member states and demands from the Member States that they monitor the effectiveness of the enforcement of REACH. It also mentions that the industry has to take full ownership of its registration dossiers and proactively work on their quality, even after submission to ECHA. Effective communication through the supply chain of information on substances and how to use them safely needs further attention.

Especially regarding SME's, EC asks for further optimizing of the implementation at all levels. The textile sector is mentioned in the review and EC mentions the study performed by Matrix regarding allergies and chemicals. In this report the REACH regulation is supported and the findings show that the risk identification and the management process are working.

The conclusion of the review in broad sense is that the regulation is working and that currently there is no need of a revision. The focus in the beginning has been on major users of chemicals (large companies producing or importing large amounts of chemicals – more than 1000 tons per year). The next phase will be to involve small- and medium-sized businesses not familiar with REACH. In 2015 the Commission has to report about this aspect to the Council and the European Parliament. This means that the focus will especially be on the smaller users and this is especially important for the fur industry as the use of chemicals is typically in smaller size.

There will be a new review of the Regulation in 2018. The Commission will also follow up on the registration requirements for substances in tonnages between 1 and 10 tones and the impact of REACH on innovation and report back in 2015. In cooperation with the Member States and ECHA, the Commission is developing a roadmap to assess and identify substances of very high concern (SVHC). It will set out clear milestones, deliverables and the division of work between the Commission, Member States and ECHA to place all relevant known SVHC on the candidate list by 2020.

Fur Europe cooperates with the International Fur Dressers' and Dyers to develop sustainability reporting for the Dressers and Dyers in Europe. The first report will be published in December 2015.