

CHEMICALS INDUSTRY PACKAGE: AN OPPORTUNITY TO SIMPLIFY REACH

Position of A.I.S.E.

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The **European association representing detergents, disinfectants and maintenance products** (A.I.S.E.) emphasises the importance of a targeted and effective revision of the REACH Regulation ((EC) No 1907/2006) through the Chemicals Industry Package.

In line with the political guidelines from President von der Leyen and the mission letters to Commissioners Séjourné and Roswall, there will be an opportunity to revise and simplify the REACH Regulation for the first time in twenty years. This will set the stage for the coming decades. Besides ensuring a high level of protection for human health and the environment – already being delivered by REACH, as the most comprehensive and advanced chemicals management legislation in the world – the revision must have the goal to reduce administrative burden for both industry and authorities, and to enhance the competitiveness of European industry as highlighted in the Draghi and Letta reports, the [Competitiveness Compass](#) and the [Clean Industrial Deal](#).

In this context, A.I.S.E. believes that the Commission's new 'SME and competitiveness check' for new legislative proposals must be applied to the critically important revision of REACH and that a level playing field and competitiveness for EU companies that invest in compliance should be preserved.

A.I.S.E.'s priorities can be summarised as follows:

- **Predictability to enable investment:** A.I.S.E. calls for the establishment of a binding regulatory roadmap, assigning priorities and clear timings for regulatory action on (groups of) substances. This will enable industry and authorities alike to plan strategically for the necessary tasks and resources, fostering innovation and facilitating the transition to new methods and alternatives.
- **A holistic approach to risk management options:** Assessment of substances in the above roadmap must take into account all available regulatory tools to identify the most practicable and cost-effective route to manage the identified risk. This means considering not only the options provided by REACH, but also those under legislation on Occupational Safety and Health (OSH), industrial emissions and so on. Identifying the best regulatory route upfront will save time and resources for all parties and be more efficient in the long run.
- **Targeted rather than generic risk management:** A.I.S.E. calls for a regulatory framework based on science and evidence, including assessments of exposure/risk and of socio-economic considerations. Restricting or banning chemicals based purely on their hazards, or a generic approach to risk management (GRA), would have a significant detrimental effect on the product offer and competitiveness of the European cleaning products industry, as shown by a [2022 economic analysis of business impacts](#). A key example of this would be ethanol, for which products such as hand sanitisers could be unnecessarily and automatically



removed from the market despite their safe use if ethanol were to be classified as CMR (Carcinogenic, Mutagenic and/or Toxic to Reproduction) Cat. 1.

- **Avoid excessive precaution on combined exposures:** industry studies, such as [A.I.S.E.'s case study](#) and those from other [downstream user sectors](#), indicate that applying a blanket Mixture Allocation Factor (MAF) to chemical safety assessments would have substantial negative impacts on formulators, on valuable applications and on animal testing, through additional compliance work to demonstrate the safety of well-established uses. More targeted risk management measures, making use of other regulatory tools such as industrial emissions controls, should be applied for the small proportion of substances that can actually contribute to the toxicity of unintentional mixtures – many of which fall outside the scope of REACH in any case.
- **Avoid burdensome new obligations for polymers:** introducing registration obligations for polymers would represent the antithesis of simplification. Many downstream users would become registrants for the first time if they produce or modify polymers for their product formulations. Targeted risk management would be more appropriate for the small subset of polymers that represent a potential risk to human health or the environment.
- **Ensure measures are enforceable and enforced:** effective management of chemicals depends on the ability and capacity to enforce rules in practice. Regulatory measures must be designed to be proportionate and enforceable; the advice of industry experts and enforcing authorities should be taken into account in this regard. A.I.S.E. supports enhanced cooperation between the EU and Member States to ensure effective control of imports, to preserve a level playing field and competitiveness for EU companies that invest in compliance.
- **Phase out animal testing:** the REACH revision is a unique opportunity to advance the phase-out of animal testing for chemical safety assessments, as proposed through the Commission Roadmap and EU Test Method & Validation strategy. Maximising regulatory use of New Approach Methodologies (NAMs) facilitates sustainable innovation and achieves a higher level of protection for human health and the environment whilst avoiding unnecessary animal testing. A.I.S.E. is concerned that without coordinated actions to accelerate regulatory use of NAMs, new REACH information requirements may significantly increase the need for new animal testing with no additional benefit for protecting human health or the environment.
- **Last, but definitely not least - let's keep talking:** A.I.S.E. calls for more scientific dialogue between economic operators and regulators/agencies to be (re-)introduced into regulatory processes for chemicals. For example, agreeing on targeted and effective adaptations of standard information requirements in registration dossiers will help to reduce animal testing as well as administrative burden for companies; whilst the ability to comment on opinions from scientific committees after they have been developed (not only before) will lead to higher quality decision-making.



Conclusion



A.I.S.E. emphasises the importance of maintaining the fundamental principles of REACH whilst advocating for targeted improvements. The association calls for science-based approaches, increased dialogue and strategic risk management to ensure the regulation continues to protect human health and the environment without compromising the competitiveness of the European cleaning products industry.

About A.I.S.E.

A.I.S.E. represents the detergents & maintenance products industry in Europe. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators since 1952. Membership consists of 29 national associations across Europe, 19 corporate members and 23 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. Committed to promoting sustainable practices and innovation, A.I.S.E. collaborates closely with European institutions, industry stakeholders, and the public to enhance the sector's environmental protection, consumer safety, and regulatory compliance efforts.

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