

# REACH – an EU election issue

## Discussion points from Eurogroup for Animal Welfare and the European Coalition to End Animal Experiments

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### Draft REACH Regulation

Requires better consideration of animal welfare issues

→ prevent enormous waste of animal lives that does not improve environmental or human health protection

→ key to "win : win situation" to link environmental, consumer and worker protection issues with competitive and economic issues

- Mandatory data sharing
- Substance tailored information requirements
- Non-animal testing



## Draft REACH Regulation

Make the sharing of all (existing) data on hazardous effects of substances mandatory without exception.

- The majority of substances to be covered under REACH have been in use for over 20 years. *It is entirely impossible that there should be no data on their hazardous effects.*

→ data available without delay → improve consumer protection

→ data sharing reduces costs for industry and workload for authorities

→ “1 substance : 1 dossier”

## Draft REACH Regulation

### Significance of (lack of) mandatory data sharing?

Technical Annex to the Commission Report on the evaluation of the active substances of plant protection products (2001)

*“For example, there were 35 notifiers for the active substance glyphosate and 11 dossiers were submitted. This proved wasteful of resources, as the Rapporteur Member State... had to examine each one... Ideally, there would have been a single dossier. This would have saved resources both for the various notifiers and for the Rapporteur Member State. It would also have resulted in fewer laboratory animals being sacrificed in duplicated testing.”*

## Draft REACH Regulation

### Implement integrated step-by-step tiered in vitro testing strategy

- Amend REACH Regulation to enable comprehensive hazard assessment based upon in vitro test methods making use of all scientifically available in vitro test methods.
- Increase funding at the EU and Member State level to bring those in vitro test methods that have not yet reached the state of validation to routine applicability in time for use under the REACH system.
- Continuously include newly accepted in vitro test methods into Regulation without delay.