



## REACH – an EU election issue



### Discussion points from Eurogroup for Animal Welfare and the European Coalition to End Animal Experiments prepared for the EEB Workshop "European chemicals policy reform – From emotions to facts", Brussels, 24 March 2004

#### ***Animal welfare issues are election issues!***

European citizens are very concerned about animal welfare as has been shown during the REACH internet consultation. The overwhelming amount of contributions made by private citizens related to animal welfare and requested avoidance of animal experiments.

If the current Draft REACH Regulation is not improved to better consider animal welfare issues, the REACH system will lead to an enormous waste of animal lives without making a contribution to improving environmental or health protection. The public is not prepared to accept this. However, animal welfare issues not only are a prerequisite to meet both the aims of environmental protection and health protection for consumers and workers. Additionally, they can be the key to ensuring a "win : win situation" to link the issues of environmental, consumer and worker protection with competitive and economic issues.

- **Data sharing.** The sharing of existing data on hazardous effects of substances must be made mandatory without exception both for the so-called "phase-in" and "non-phase-in" substances. This serves to improve consumer protection by ensuring that existing information can be used for risk assessment and risk reduction measures without delay. At the same time it serves to reduce the costs for industry and to reduce the workload for the authorities. The importance of this subject is confirmed by the experience gained with the ongoing programme for the evaluation of existing active substances for pesticides, a Commission report on which reveals that for one single existing substance, 35 notifications and 11 dossiers were submitted<sup>1</sup>. This is an enormous waste of animal lives and financial and personal resources (both for industry and authorities) and does not make a contribution to improving human health or environmental protection. The recurrence of such a scenario must effectively be prevented in the up-coming REACH system.
- **Testing strategies.** Even though it has been said that information requirements will be tailored to the specific information needs for a given substance, for example by relating them to exposure, the provisions in the Draft REACH Regulation do not go far enough to ensure that this will take place in practice. If left unchanged, the requirements would lead to the compilation of unnecessary information that does not serve to implement risk reduction measures. The collection of information should stop as soon as findings on a particular toxicological end-point point to the need for stringent control measures.
- **Animal tests** not only pose ethical problems but are scientifically flawed and can be misleading instead of improving human health or environmental protection. Additionally, oftentimes they are expensive and time consuming thereby unnecessarily increasing the costs of the system. The Draft REACH Regulation should be amended to enable a comprehensive hazard assessment based upon in vitro test methods.

Evaluations performed by Eurogroup and the Coalition have shown that the goals depicted can be met. During the panel debate, examples will be given to underline the importance of the animal welfare issues to meet environmental and health protection goals while at the same time linking these with economic issues.

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<sup>1</sup> Document SANCO/2692/2001 of 25 July 2001.