

Position Paper on the Upcoming REACH Revision

Recommendations to improve decision-making in REACH and enhance circular economy objectives



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Introduction

The REACH Regulation has played a vital role in improving chemical safety, transparency, and circularity across EU supply chains. Its upcoming revision presents an opportunity to streamline and enhance decision-making processes in chemicals and sustainability policy at EU level while deepening the uptake of the Circular Economy in the EU.

Transparency is the foundation of REACH. A successful revision of REACH needs to make supply chains transparency spread throughout the entire regulatory process—especially in grouping, prioritisation, and decision-making. Better collaboration between regulators and industry will ensure focus on hazardous substances while enabling safer ones to circulate freely and support recycling.

We offer the following recommendations to strengthen REACH's scientific basis, improve decision-making, and accelerate progress toward the EU's green and industrial goals. To improve REACH implementation, reinforce its scientific foundation, and support its role as a central instrument of the EU's green and industrial transitions.

Promoting a Collaborative and Science-Based Approach to Grouping

Although much work remains to fulfill the initial goals of the REACH Regulation, the increased transparency it has brought has already been driving safer chemical use and better-informed supply chains in the EU.

Stakeholders benefit from a number of avenues to channel real world data to policy makers to inform regulatory action under REACH (e.g. calls for evidence under Annex XV Dossiers). EURIMA believes this principle of openness and transparency could however be deepened in grouping and prioritisation to regulatory action that happens before formal regulatory action is initiated under REACH. Greater openness in Member State strategies and early engagement with industry will boost trust, data quality, and outcomes aligned with real-world use and circularity.

We believe the following recommendations could be a source of inspiration to the European Commission as it prepares to update the REACH Revision and takes a look at the various decision-making processes under it.

Enhancing the Screening and Prioritization Process

We believe that the following elements could help create a more robust and forward-looking screening and prioritisation process

- 1. Transparency in Grouping Strategies and Risk Management**
Member States should publish along a harmonised format the scientific rationale of grouping choices early to enable informed input from industry.
- 2. Improved Usability of Substance Databases**
The ECHA Chem portal should be cleaned of outdated and inactive entries to avoid misleading groupings and improve clarity for regulators and stakeholders.
- 3. Formalised Stakeholder Participation in Early Phases**
Industry and stakeholders should be more closely involved in ARN and RMOA stages.
- 4. Guardrails and Oversight for AI Tools**
AI should support, not replace, expert judgment in decision making, future and current plans to use for regulatory action should be framed by a memorandum of good practice agreed with industry.
- 5. Integration of Criticality and Essential Use Considerations**
Grouping strategies should reflect critical and essential applications to avoid disruptions to key sectors. The circular potential of materials should be an important element of these considerations.

Policy recommendations

Beyond these practical recommendations, we believe the key policy principles we shared in 2022 during the European Commission's REACH revision consultation still apply.

1. Integrating Alternative Test Methods

Eurima stresses that the support and further integration of alternative test methods in REACH should not be forgotten in the REACH Revision. The targeted revision may also offer an opportunity to simply and streamline the route to alternative test validation in the EU as well as the use of In Vitro testing data for REACH compliance. The current process is overly complex and discourages industry stakeholders from developing In Vitro test methods. The integration should continue to focus on international validation for global harmonization.

2. Improving Use Communication

Trade associations should lead in substance use communication. As Eurima stressed in 2022 the ENES network could be used to leverage better communication on substances uses in risk assessment, including grouped assessments.

3. Restriction must become the default way to regulate chemicals

EURIMA stressed in earlier public consultations on the REACH Revision that restrictions should replace authorisation as the primary regulatory tool while maintaining flexibility and legal certainty.

4. Essential Uses and Safe Legacy Materials

Eurima noted in the earlier consultation that the Essential Use could better reflect the societal value of a substance if a holistic approach is adopted. For example, a use could be 'essential' if it helps reducing the environmental impact of products at the production or at the waste stage.

5. Align Chemical and Waste Regulations

Ensure that REACH supports the recycling of mineral wool. Better coordination and guidance between REACH and waste law is needed so recyclers know early on how to meet any safety standards, allowing mineral wool to re-enter the market without undue regulatory burden on compliant material.

Conclusion

These principles could in our perspective guide a robust, evidence-based, targeted revision of REACH. It has the potential to protect public health and the environment while supporting economic growth, fostering the development of the circular economy and enhancing the competitiveness of European industries. In adopting these proposals, the European Commission and Member States have the opportunity to continue to raise the bar on regulatory risk assessment whilst giving more voice to manufacturers of critical material substances and innovators in the European Union.

We are available to discuss these principles in more detail with the European Commission.



About Eurima

Eurima was established in 1959 and represents European Mineral Wool Insulation Manufacturers. These bio-soluble mineral wool fibres (glass wool, stone wool and slag wool) manufactured by Eurima members are exempted under the Note Q to Annex VI to the CLP Regulation (the 'Note Q'). The Note Q was established under the Dangerous Substances Directive as recognition of the low toxicity profile of highly bio-soluble mineral fibres that manufacturers had developed, scaled up and elevated to an industry gold standard.

Parallel to this legislative development, Eurima members have made a commitment to report to the European Commission on the safe production and use of their mineral wool products in Europe via the data collected through Safe Use Instruction Sheets (SUIS). Manufacturers have also agreed to use a unified set of pictograms instructing workers and consumers on the proper use and risk management measures of mineral wool products.

The independently certified EUCB scheme grants a label guaranteeing the compliance of mineral products to the Note Q bio-solubility exoneration criteria. EUCB is well known and respected in the construction industry as the proof of safety of mineral wool fibres for markets inside and outside the EU. Because the scheme is directly linked to CLP criteria, Eurima stresses the importance of safeguarding the robustness of the current framework.

Together, these efforts underscore our commitment to sustainability, safety, and the vital role that high-quality mineral wool insulation plays in Europe's energy transition. Mineral Wool Insulation Fibres aligns with the European Commission's evolving discussions on essentiality, underscoring our strategic contribution to the continent's energy transition.

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