

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

Statement on the Revision of the Regulation on the registration, evaluation, authorisation and restriction of chemicals (REACH)

The European Commission's upcoming revision of the [Regulation](#) on the registration, evaluation, authorisation and restriction of chemicals (REACH) presents an important opportunity to learn from the challenges related to effective implementation of the original legislation to strengthen the protection of human health and the environment from the risks posed by chemicals.

European doctors support the revision as the 2005 CPME [policy](#) already underlined the pathogenic link between chemical products and the epidemiology of diseases, before the REACH was adopted in 2006. The revised REACH must focus on the long-term and intergenerational health impacts of chemicals as well as the current cumulative and combined exposure to chemicals in the living environment, food, and workplaces. The EU institutions must ensure that the revision will deliver effective protection of human health and environment, on which humans depend, from harmful chemicals, as is the purpose of the legislation.

European doctors call on policy-makers to consider:

- Effective implementation of the [precautionary principle](#), which moves the burden of proof of safety from the EU to the relevant industry. This was the original intention of the legislation, but in practice this has not happened yet. Effective legal consequences for non-compliance if the precautionary principle is not applied.
- Responsibility of the chemical manufacturers for the harm their chemicals cause and legal consequences for non-compliance.
- Effective implementation of the substitution principle to replace hazardous chemicals with less hazardous alternatives, and follow the European Commission's [essential use concept](#).

- The entire population is vulnerable due to the lack of choice regarding exposure, but there are groups with additional vulnerabilities, such as:
 - children and youth, including prenatal exposure;
 - pregnant women and women of childbearing age;
 - individuals with pre-existing health conditions.
- Accelerated identification and restriction of endocrine-disrupting substances, before chemicals go to market.
- Stringent regulation on per- and polyfluoroalkyl substances (PFAS) and other persistent, bioaccumulative, and toxic substances, including safe substitution where feasible.
- Prioritising the prevention of cumulative exposure in chemical risk assessment and working towards environmental justice, including:
 - Taking into account the combined exposure to chemicals, and mixtures of chemicals, from multiple sources and environmental exposure pathways, such as air, water, food, and consumer products;
 - Mitigating the disproportionate burden of chemical exposures in certain communities or regions.
- Prevention of occupational health risks, as workers in sectors with high exposure risks, such as industry, agriculture, healthcare, and cleaning, need stronger protection.
- Stronger, more effective registration requirements for companies to provide adequate information upfront, including on the new hazard classes of the Classification, Labelling and Packaging of chemicals ([CLP Regulation](#)).
- Better transparency and accessible, clear and understandable information on chemical substances, in line with the [Aarhus Regulation](#) (Article 5), for:
 - healthcare professionals to support informed clinical decision-making;
 - the public to enable informed choices.
- Dedicated and updated information requirements for endocrine disruption for human health.
- Link with the UN Sustainable Development Goals, aligning REACH with climate and circular economy policies, for example:
 - ensuring harmful substances are not perpetuated in environmental exposures through recycling processes;
 - preventing climate and environmental measures from introducing new health risks through insufficiently evaluated substitute chemicals.