EU-Level Chemical Policy Stakeholder Workshop | Brussels 2025 | Concept

Event title

Helmholtz Stakeholder Workshop on the REACH Revision: (How) Can Chemical Pollution, Competitiveness, and New Approach Methodologies Be Aligned?

Organisers/Contact

Lead Scientists: **Prof. Dr. Sina Leipold** and **Henry Hempel** (PhD Candidate) Department of Environmental Politics, Helmholtz Centre for Environmental Research – UFZ Permoserstraße 15, 04318 Leipzig, Germany Tel.: +49 (0) 341 60251166, Email: <u>henry.hempel@ufz.de</u>

Marie Heidenreich, Head of SynCom | Helmholtz Earth & Environment Markgrafenstraße 22, 10117 Berlin, Germany Tel.: +49 (0) 30 206 7957 32, Email: <u>marie.heidenreich@gfz-potsdam.de</u>

Participating Helmholtz Partners: Prof. Dr. Beate I. Escher, Prof. Dr. Ana C. Zenclussen (UFZ, lead), Dr. Pia-J. Schweizer (RIFS), Prof. Dr. Ralf Ebinghaus (Hereon), Prof. Dr. Michael Schloter (Helmholtz Munich), Dr. Katharina Sielemann, Stefanie Kuballa-Cottone (SynCom), Dr. Andreas Krell (Helmholtz Brussels), Johannes Bade (Representation of the State of Hessen to the EU)

Background and Objectives

The European Union's (EU) central chemical regulation **REACH** (*Registration, Evaluation, Authorisation and Restriction of Chemicals*) is approaching a critical juncture with the **planned revision in 2025**. In its recent *Competitiveness Compass* publication, the European Commission (2025, p. 12) scheduled a proposal of a *Chemicals Industry Package* for the last quarter of 2025. As a key pillar of this package, the REACH revision—although announced and postponed several times under *von der Leyen I* (Simon 2024)—has been reaffirmed. Von der Leyen, along with the Commissioners for Environment and Industry, have pledged to "**simplify**

REACH" by reducing administrative burdens for companies and streamlining legislative implementation (Roswall 2024; Séjourné 2024; von der Leyen 2024, p. 9).

EU chemical policy stakeholders hold different **positions** and **expectations** for the REACH revision. Its **timing** is already a **contentious issue**, even before the actual legal text has been discussed. For example, the German chemical **industry association** VCI (2024a, p. 4) opposes a rapid and major overhaul of REACH. Instead, it argues that "[n]o quick decisions on a revision are necessary", favouring changes to annexes or guidance documents over amendments to the legal text. **Environmental NGOs** criticise the postponement of the REACH revision during the *von der Leyen I* Commission. For example, Client Earth (2024) calls for an "urgent" revision, citing "very high" levels of non-compliance with REACH obligations. It also highlights newly identified scientific findings on the harmful effects of chemicals and their uses, which are not recognised in current regulation.

Apart from the timing of the revision, stakeholders are debating the **direction and nature of the proposed legislative change**. EU chemical **industry actors** emphasise the importance of **regulatory simplification** (Cefic & Advancy 2025) and the essential role of **chemical diversity**, availability, and safety for the economy and society (VCI 2024b, p. 6). Environmental **advocates**, on the other hand, highlight the necessity of a REACH revision that prioritises **greater protection for human health and ecosystems** (EEB *et al.* 2022). To this end, scholars propose **Chemical Simplification**—reducing the number and variety of chemical substances and mixtures used in products—as an approach to tackling the EU's chemical pollution challenges and economic pressures (Fenner & Scheringer 2021). **NAMs** (*New Approach Methodologies*) could play a central role in this context. They could be used for chemical simplification approaches such as chemical grouping or mixture assessment (Escher *et al.* 2023). Within the context of NAMs and beyond, industry associations have expressed disapproval of new regulations (VCI 2023; 2024a, p. 4).

These positions illustrate the **politics** of **aligning sustainability** and **competitiveness** in the EU chemicals sector. The involved stakeholders shape (the imaginaries of) the REACH revision's **future opportunities and challenges**. Within our workshop, we aim to engage different discursive positions and expectations of stakeholders, as well as the dynamics between them, to anticipate future policy directions early on (Leipold *et al.* 2021, p. 8). This analysis can help

Research for grand challenges.

HELMHOLTZ

navigate policy debates and identify narrative shifts, which often fundamentally alter policies (Luo *et al.* 2023, pp. 127-128). In this light, key questions include:

- What positions and roles do EU chemical policy stakeholders adopt concerning the (temporal dimension of the) REACH revision?
- What insights do these positions and roles offer for shaping the (discursive) future of EU chemical policy and politics?

The workshop aims to serve as an **early warning system** by identifying potential weaknesses and opportunities in the REACH revision process before the final legislation is enacted. We are looking back on a broad, inclusive, and comprehensive stakeholder dialogue on these issues we implemented in 2024 in Germany – bringing together industry leaders, NGOs, researchers, and regulatory bodies, discussing issues relevant to the European stage. Drawing on research synthesis from the SynCom project *Modernizing Hazard Indicators* (ModHaz, see Hempel *et al.* 2024), alongside insights from stakeholders in policy, industry, NGOs, and academia, the event will enable dialogue and contribute actionable guidance for improving chemical regulation in the EU.

Workshop Organisation

Target Audience

- Representatives from the European Commission (e.g., DG ENV, DG RTD, DG AGRI, DG GROW, DG SANTE)
- European Chemicals Agency (ECHA)
- Members of the European Parliament (MEPs)
- Representatives from the chemical industry (e.g., CEFIC, VCI)
- Chemical and environmental NGOs (e.g., ChemTrust)
- Member states competent authorities (e.g., BfR, UBA)
- Researchers from the participating Helmholtz Centres and other research institutions

Number of Participants

Approximately 30 attendees

Venue and Timing:

Location: EU Liaison Office of the German Research Organisations (KoWi), Conference Room Duration: 4 hours (e.g., 10:00 am – 2:00 pm) including lunch from 12:30 am – 1:30 pm Format: A small, interactive workshop with a focus on exchange, open discussion sessions, and break-out groups rather than a high-level panel-only format. Emphasis will be placed on mutual learning, dialogue, and developing actionable insights.

Language

English

Expected Outcomes:

- Identify and establish common denominators among diverse stakeholder groups regarding the upcoming REACH revision through pragmatic compromises that respect defined red lines.
- Facilitate transparent communication, ensure a fair balance of regulatory requirements and industry needs to enable an early identification of potential shortcomings in the proposed legislation and strategies to address them.
- Develop actionable solutions that are both feasible and widely acceptable to provide actionable recommendations that feed into the policymaking process.
- Rather than seeking ideal outcomes, focus on practical agreements that accommodate key priorities—such as compliance, innovation, and sustainability—while maintaining a cooperative and future-oriented approach
- Gain a clearer understanding of the drivers, opportunities, and challenges surrounding the 2025 REACH revision
- Strengthen networks among policymakers, industry representatives, NGOs, and researchers
- Advance discussion on NAMs, grouping approaches, chemical versus regulatory simplification, regrettable substitutions and the effective integration of a Mixture Assessment Factor (MAF) in chemical assessments

Workshop Agenda

No and Time	Title	Who
1 (10.00 a.m.)	Opening Remarks	
2 (10.10 a.m.)	3 Impulse Lectures (ModHaz Project So Far,	UFZ, RIFS, Hereon,
	NAMs and CTE/PTE, Overview REACH Revi-	Helmholtz Munich,
	sion); 8 minutes each with questions at the end	SynCom
3 (10.40 a.m.)	Breakout Sessions (World Café with 3 breakout	UFZ, RIFS, Hereon,
	sessions (3 min intro by 3-4 table hosts: who am	Helmholtz Munich,
	I, my research, focus question of my table. 3-4x12	SynCom
	min discussion at 3-4 tables)	
	a) The (Temporal Dimension of the) REACH re-	20 min for one
	vision: Priorities and Trade-offs	group, after 20min
	b) NAMs and the CTE/PTE concept (in the	people change
	REACH Revision and Beyond)	group
	c) The Future of EU Chemical Policy: Long-	
	Term Visions and Strategic Pathways	
4 (11.45 p.m.)	Report from Breakout Sessions & Plenum Discus-	Breakout Session
	sion	Hosts
5 (12.00 p.m.)	Resume & Closing Words	
6 (12.10 p.m.	Discussions and networking over joint lunch	All
13.30 p.m.)		

References

- Cefic, & Advancy. (2025). *The Competitiveness of the European Chemical Industry*. Cefic. Retrieved 14 February 2025 from <u>https://cefic.org/app/uploads/2025/01/Cefic-</u> Advancy-study-The-Competitiveness-of-the-European-Chemical-Industry.pdf
- Client Earth. (2024). Warum REACH weiterentwickelt werden muss: Neue Erkenntnisse und mangelnde Durchsetzung. Client Earth. Retrieved 9 December 2024 from https://www.clientearth.de/aktuelles/aktuelle-news/warum-reach-weiterentwickelt-werden-muss-neue-erkenntnisse-und-mangelnde-durchsetzung/
- EEB, et al. (2022). Delivering a toxic-free environment under REACH. Eight key NGO demands to improve the REACH Regulation. Zero Waste Europe. Retrieved 18 November 2024 from <u>https://zerowasteeurope.eu/library/delivering-a-toxic-free-</u> environment-under-reach-eight-key-ngo-demands-to-improve-the-reach-regulation/

- Escher, BI, et al. (2023). Modernizing persistence–bioaccumulation–toxicity (PBT) assessment with high throughput animal-free methods. Archives of Toxicology, 97(5), 1267-1283. <u>https://doi.org/10.1007/s00204-023-03485-5</u>
- European Commission. (2025). A Competitiveness Compass for the EU. Brussels: European Commission Retrieved from <u>https://eur-lex.europa.eu/legal-</u> <u>content/EN/TXT/PDF/?uri=CELEX:52025DC0030</u>
- Fenner, K, & Scheringer, M. (2021). The Need for Chemical Simplification As a Logical Consequence of Ever-Increasing Chemical Pollution. *Environmental Science & Technology*, 55(21), 14470-14472. <u>https://doi.org/10.1021/acs.est.1c04903</u>
- Hempel, H, et al. (2024). Mehr Stoffe schneller testen Potenziale für eine bessere Chemikalienregulierung [Policy Brief]. SynCom, Helmholtz Erde & Umwelt, 4. <u>https://doi.org/10.48440/syncom.2024.003</u> (Berlin)
- Leipold, S, et al. (2021). Do we need a 'circular society'? Competing narratives of the circular economy in the French food sector. *Ecological Economics*, *1*87, 107086. <u>https://doi.org/10.1016/j.ecolecon.2021.107086</u>
- Luo, A, *et al.* (2023). Explanations of the political gridlock behind international circular economy: Waste Ban narratives in the China-EU cooperation. *Ambio*, *52*(1), 126-139. <u>https://doi.org/10.1007/s13280-022-01758-4</u>
- Roswall, J. (2024). Questionnaire to the commissioner-designate Jessika Roswall Environment, water resilience and a competitive circular economy. European Commission. Retrieved 11 November 2024 from <u>https://hearings.elections.europa.eu/documents/roswall/roswall_writtenquestionsanda</u> nswers_en.pdf
- Séjourné, S. (2024). Questionnaire to the commissioner-designate Stéphane Séjourné Executive vice-president for prosperity and industrial strategy. European Commission. Retrieved 11 November 2024 from <u>https://hearings.elections.europa.eu/documents/sejourne/sejourne_writtenquestionsa</u> ndanswers_en.pdf
- Simon, F. (2024). *EU quietly shelves REACH regulation on toxic chemicals*. Euractiv. Retrieved 18 November 2024 from <u>https://www.euractiv.com/section/chemicals/news/eu-quietly-shelves-reach-regulation-on-toxic-chemicals/</u>
- VCI. (2023). New Approach Methodologies (NAMs). Verband der Chemischen Industrie. Retrieved 16 May 2024 from <u>https://www.vci.de/ergaenzende-downloads/vci-positionspapier-nams-englisch-231013.pdf</u>
- VCI. (2024a). "New Commission, New Approach" Designing the "New Chemicals Industry Package". Verband der Chemischen Industrie. Retrieved 9 December 2024 from https://www.vci.de/ergaenzende-downloads/vci-position-chemicals-industrypackage.pdf
- VCI. (2024b). VCI-Stellungnahme zur Deutschen Nachhaltigkeitsstrategie Weiterentwicklung 2024 (Dialogfassung). Verband der Chemischen Industrie. Retrieved 18 September 2024 from <u>https://www.vci.de/ergaenzende-downloads/vci-stellungnahme-deutsche-nachhaltigkeitsstrategie.pdf</u>
- von der Leyen, U. (2024). *Jessika Roswall Mission letter*. European Commission. Retrieved 11 November 2024 from <u>https://commission.europa.eu/document/10a1fd18-2f1b-</u> <u>4363-828e-bb72851ffce1_en</u>