

## Stockholm Region Association for European Affairs' position on the simplification of REACH

Considering the European Commission's pledge in the 2024-2029 Political Guidelines to put forward a chemicals package aiming to simplify REACH, the Stockholm Region EU Office presents the position of the Stockholm Region Association for European Affairs on the simplification of REACH adopted by the Executive Committee of the Stockholm Region Association for European Affairs in April 2025.

### Overall perspective

From an urban perspective, the simplification of REACH can be viewed through various lenses. For the metropolitan region of Stockholm, this includes public health, environmental protection, urban sustainability, economic impacts and the practicalities of implementation at the local level. The inhabitants and the environment of the metropolitan Region of Stockholm are exposed to harmful chemicals, including pollution from various sources such as vehicles, construction and industry. Stockholm is committed to being fossil-fuel-free by 2040 and climate-positive by 2030, with a clear vision for a non-toxic environment and world-leading chemical management. The metropolitan region has strategic action plans to reduce waste, reuse materials and recycle products to protect citizens' health and reduce environmental pollution.

A simplification of REACH that is synonymous with improved regulatory efficiency and policy alignment would allow for not only safer use of chemicals but also:

- Accelerated action on regulating and phasing out dangerous chemicals
- A competitive edge in sustainable innovation, technology and business development
- More efficient enforcement at the local level, higher compliance and increased safety
- Effective communication, raised awareness cost reduction and resource allocation
- Greater alignment with EU sustainability goals and the latest environmental regulation
- Strengthened public engagement, transparency and trust

### Stockholm Region Association of European Affairs' position summarised in 3 key points

- 1. The Association highlights the need for a targeted revision of REACH** that aligns with the EU's zero-pollution ambition by 2050, emphasising the need for a safe and sustainable-by-design approach to chemicals to ensure high chemical safety standards, promotion of alternative methods for substance hazard assessments, clear targets with definite timetables and proactive involvement of local actors in driving efforts to lead sustainability.
- 2. The Association strongly advocates for strict, clear and transparent** information requirements to ensure high-quality safety data, including full material declarations covering both chemical products and consumer goods, comprehensive reporting on chemical content in goods and products, improved safety assessments and continuous dialogue between industry, public sector and ECHA to phase out hazardous substances.
- 3. The Association affirms that simplifying and aligning REACH** with the Chemicals Strategy for Sustainability can reduce hazardous chemical use, promote safer products, enhance public health and environmental protection through a systemic risk management approach that prioritises safety, supports innovation, and ensures long-term planning and substitution of hazardous substances.

## Aim, scope and application

### *Revise to ensure a modern and efficient application whilst staying true to the original purpose*

- The Association **fully recognises the urgent need for a targeted revision of the existing REACH Regulation**, based on Article 114 of the Treaty on the Functioning of the European Union aiming to harmonise provisions on chemicals at the EU level. The Regulation aligns with the Association's aim to phase out substances that constitute hazards to the environment and health. The overall objective of the Regulation is to ensure that the provisions of REACH reflect the ambitions of the European Commission to establish a framework that regulates the production, marketing, and use of substances.
- In line with the purpose of the original Regulation, the Association underlines the importance of maintaining a high level of protection of human health and the environment. This includes continued cross-sector collaboration for innovation and competitiveness, promotion of alternative methods for assessing substance hazards and raising awareness at local levels. The Association thus **emphasises the role of local actors in achieving the EU's zero pollution ambition for a non-toxic environment by 2050**.
- The Association **welcomes an ambitious approach to provisions governing substances**, requiring manufacturers and importers to ensure that only consumer goods and products that are safe and sustainable by design throughout their lifecycle are placed on the market. In line with the local vision of Stockholm being a non-toxic environment by 2030, the metropolitan region emphasises the importance of maintaining high ambitions and clear targets with definite timetables.

## Knowledge development and transparency

### *Realising a new safety assessment framework with clear requirements and stakeholder dialogue*

- To fulfil the vision of Stockholm being a non-toxic urban environment by 2030, the Association emphasises the critical role of local authorities and regional key actors in ensuring proper chemical registration and compliance. The Association calls for **strict, clear and transparent information requirements, including a full material declaration, for registrants and companies**. This would enhance access to detailed information on chemical use to support Stockholm's administration in achieving its goals.
- Most municipalities' use of chemicals consists of chemicals in goods, but also chemical products. Consequently, it is primarily through goods that users are exposed to hazardous substances in our operations. **Current legislation applies to the requirements for information on the content of chemical products but does not cover goods**. The existing Article 33 of REACH (which states that we must receive information about whether a product we buy contains particularly hazardous substances) is still being complied with to a limited extent. Accordingly, it is almost impossible to avoid these substances that will end up on the list in the future. This includes most of the PFAS substances.
- While understandable that the regulation of substances needs proper time to be put into action, users of goods who want to avoid hazardous substances before the regulatory processes have been completed need to be able to do so. The Association thereby supports **a more comprehensive and better-implemented obligation to report the chemical content of goods (a full material declaration)** which is essential to speed up the work of phasing out hazardous substances.

- Recognising that humans and the environment are simultaneously exposed to a mixture of substances from multiple sources, the Association notes that the current safety assessments do not adequately protect against all the combined risks. Emphasising the local vision of a non-toxic urban and sub-urban environment by 2030, the Association supports the **development of a new safety assessment framework** with robust and reliable assessment methods, in line with the one substance, one assessment approach. For substances produced in volumes below 10 tonnes per year, the Association stresses the importance of maintaining targeted and proportionate information requirements to ensure efficient enforcement and increased safety at the local and regional levels. Maintaining proportionate information requirements would also entail avoiding unnecessary, more extensive use of quantitative approaches for the assessment of non-threshold substances. At the same time, it is essential to consider the capacity of local authorities, as oversimplified requirements risk delaying the early detection of harmful substances and placing additional strain on municipal oversight.
- The Association supports a **continuous dialogue between industry, public sector and ECHA** during dossier evaluation processes to secure necessary safety data. Filling in the REACH registration dossiers is a time-consuming process that entails additional burdens for Stockholm's administrations and companies. The Association firmly believes that a consistent and open dialogue with ECHA is key to ensuring high-quality safety data, clear expectations and effective resource allocation.
- At the forefront of innovative chemical management practices, local and regional actors in Stockholm have developed innovative approaches to chemical substitutions. Accordingly, the Association **supports stricter disclosure requirements**, ensuring that registrants provide comprehensive data, including stricter requirements to list contaminations, byproducts and residual starting materials (such as BPA, BADGE, Triton X-100, Oktylphenol, etc.) and the environmental footprint of their substances, covering all stages of their lifecycle.

## Risk Management

### *Revise to improve efficiency, predictability and flexibility for sustainable leadership*

- Sharply reduced use and spread of toxic chemicals are key to creating sustainable urban and sub-urban environments for better public health outcomes and well-being. A simplification of REACH provides an opportunity to improve the efficiency, predictability and flexibility of the existing framework. **Making the framework more coherent with the latest pieces of environmental legislation and overarching goals of the Chemicals Strategy for Sustainability ensures that sustainable chemistry drives zero pollution** whilst empowering a clean and competitive transition toward a circular economy.
- The Association emphasises **the need for chemical substances and products that are safe and sustainable by design**, according to the Safe and Sustainable by Design initiative by the European Commission, which should be promoted by or integrated into REACH.
- An improved REACH should have simpler and faster restrictions and align with the core objectives of the Chemicals Strategy for Sustainability, including **consistent regulation and fixed phase-out dates**, which would allow for regional and local long-term planning and proactive substitution procedures of the most hazardous substances for the highest protection of the health of professional users, citizens and the environment.

- The Association affirms the importance of **multilevel governance and the critical role of local actors in developing sustainable value chains and innovative ecosystems**. This would provide significant benefits like better public health, cleaner environments, safer consumer products and more sustainable urban development.
- Stockholm is at the forefront of innovation and clean tech with ambitious goals at city and regional levels to create a non-toxic urban and sub-urban environment by 2030. The Association **welcomes a systemic risk management approach which considers the complex and interconnected nature of urban and sub-urban systems** (health, environment, transport, construction, economy and social equity). A revised REACH should set clear priorities for actions that safeguard the highest protection benefit whilst providing **strong incentives for safe and sustainable substitutes** as well as leadership.
- The generic approach should ensure no consumer products contain substances that are carcinogenic, mutagenic, toxic, endocrine-disrupting, or persistent, as these hazards require broader risk assessments. It is not enough to look at the exposure in the intended use to assess the risk. The Association believes that **the generic approach should also cover substances with immunological, neurological or organ toxicity**. In addition, regulating similar substances together, as with PFAS, simplifies the process while ensuring consistent protection for consumers, professional users, vulnerable groups, and the environment, **allowing essential uses where proven essential for society**. To this end, the Association stresses that the revision of REACH should reinforce the legal framework for grouping chemicals, enabling more efficient and comprehensive risk management, whilst acknowledging the need for strong enforcement mechanisms to ensure that simplified processes do not lead to delayed detection of harmful substances.
- Derogations for so-defined “essential uses” should only be granted when these are clearly recognised as critical for societal needs. To this end, the **concept of essential uses needs to be clearly defined under the new REACH**, introducing clear requirements reflecting on the principles outlined so far by the European Commission.

The Stockholm Region Association for European Affairs welcomes an open, constructive dialogue on a simplified REACH. The Association remains committed to ensuring the highest levels of protection for human health and the environment.