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Subject: ECHA's scientific and technical support to the European Commission in 2022 on the Chemicals Strategy for Sustainability

Your ref: Ares(2020)7814743 and Ares(2021)2470219

Dear Directors,

During 2022, we at the European Chemicals Agency (ECHA) have supported the implementation of the Chemicals Strategy for Sustainability (CSS) in our scientific and technical role as requested by the Commission¹. With this letter we would like to honour our commitment to transparency and give a public summary of the input, as well as reconfirm our commitment to continue supporting the Commission during 2023. This letter will be shared with ECHA's Management Board and published on the ECHA website. Furthermore, as previously agreed, we will also make available other key contributions once the respective legislative proposals are adopted, for transparency purposes and to satisfy information requests from stakeholders.

Revision of the REACH and CLP Regulations

The Commission published a proposal for the revision of the CLP Regulation, together with a Delegated Act on 19 December 2022. In the course of the year, ECHA provided scientific and technical input to the Commission and its contractor in support of the finalisation of the impact assessment, the staff working document and the legal texts.

As the Commission intensified its preparatory work for the revision of the REACH Regulation, initially foreseen to be adopted by the end of 2022, requests for contributions from ECHA also increased, including requests in support of the preparation of the REACH impact assessment.

On polymer registration, ECHA participated in the dedicated CARACAL subgroup meetings and provided on several occasions direct input to the Commission and more particularly regarding questions on workability.

Multiple exchanges also took place with regard to the possible amendment of information requirements, as well as on improving the registration and evaluation processes. Moreover, an ex-ante approach for SME verification under REACH registration was discussed.

We also contributed to discussions on possible ways to strengthen the enforcement of REACH by customs, as well as on a possible new European Audit Capacity. For both these topics, ECHA facilitated the provision of a position by its Enforcement Forum, composed of experts appointed by the Member States.

¹ See the Commission [note](#) of 21 December 2020 and [letter](#) dated 12 April 2021.

In April 2022 the Commission published the Restrictions Roadmap. ECHA has given extensive input to the development of this roadmap including providing (groups of) substances that could be included where the assessments of regulatory needs, from our Integrated Regulatory Strategy work recommends restriction². In addition, ECHA provided our views on the topic of reforming the restrictions and authorisation processes and elaborated on how ECHA sees this framework working under REACH and CLP 2.0, whilst being in line with the Integrated Regulatory Strategy (IRS).

CSS working groups

At the invitation of the Commission, ECHA contributed to the work of several CSS working groups, including those on 'one substance, one assessment' (1S1A), indicators, a strategic research and innovation agenda, generic risk assessment, endocrine disruptors, mixtures, enforcement, safe and sustainable by design, and global issues. In addition to participating in these working group meetings, we also commented on draft documents circulated and, in some cases, supported the Commission in running the meetings.

The work of the 1S1A working group is particularly relevant to ECHA, as it aims to streamline the scientific advice provided to the Commission from different sources and under different pieces of legislation. Besides the Commission's inter-service group, ECHA has also been requested to join a dedicated 1S1A expert group with Member States and EU agencies.

For the working group on indicators, ECHA took a role as technical co-lead together with the European Environment Agency, towards the development of an indicator framework on chemicals as part of the Zero Pollution and 8th Environment Action Programme monitoring framework. The work in 2022 focused on prototyping of individual indicators and further preparing towards the delivery of a public framework with a dashboard of indicators and a synthesis report in Q1 2024.

In addition, ECHA contributed to the newly established Partnership for the Assessment of Risk from Chemicals (PARC) to develop EU-wide human and environmental biomonitoring.

New tasks for the Agency

At the request of the Commission, ECHA analysed the possible impact the reattribution of a number of tasks to the Agency may have on its committees, key experts, data model and IT infrastructure, as well as on the Member States' resources needed to support such tasks. We analysed the resource impact such reattribution may have on the Agency and provided technical input to the Commission during the preparation of the impact assessments and legal proposals. Examples here include the Regulation on Cross-border Health Threats, the Battery Regulation, the Industrial Emissions Directive, the Groundwater, Water Framework and Environmental Quality Standards Directives, among others.

In addition, the Commission is preparing a legislative proposal on removing legal obstacles to data sharing, which may include a number of "data-related" new tasks for ECHA. An important planned proposal concerns an EU Common Data Platform on Chemicals, for which the Commission tasked the Agency to coordinate, with the input from other contributing EU agencies, the drafting of an implementation plan. ECHA delivered this draft implementation plan to the Commission at the end of 2022 and this will be used to support the future legal proposal. ECHA also provided technical input on other data-related topics, for instance as member of the steering group for a study on a future repository of health limit values or related to proposals to extend

² <https://echa.europa.eu/documents/10162/1459379/Restrictions+Roadmap+-+ECHA+input.pdf/5b460553-1401-9b90-2e3d-662587dae77b?t=1639047513926>

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the Public Activities Coordination Tool (PACT) or reattribute the Information Platform for Chemical Monitoring (IPCHEM) to ECHA.

Continued commitment in 2023

We remain fully committed to supporting the Commission in its work on the CSS and the wider EU Green Deal.

In 2023, ECHA will commence the development of its new strategy statement for the period 2024-2028. This work will be led by our Management Board. In this regard, the implementation of our current mandate as well as the increased mandate that comes with the CSS, will need to be front and centre. The importance and relevance of our scientific and technical expertise to enable legal and policy goals be met will also need to be taken into account. We look forward to working with the Commission and our Management Board to ensure that our priorities are aligned and that we have sufficient resources to deliver the increased expectations and our ever-expanding legal mandate.

Yours sincerely,

*[e-signed]*³

Dr Sharon McGuinness
Executive Director

Cc: C. de Avila, P. Korytar, K. Berend, G. Casella, A. El Ameli, H. Ingels

³ This communication has been approved according to ECHA's internal decision-approval process.