

EAERE and the European Chemicals Agency, 2022

EAERE is listed among the stakeholder organisations of the [European Chemical Agency \(ECHA\)](#). The Agency, located in Helsinki, is the driving force among regulatory authorities in implementing the EU's ground-breaking chemicals legislation, particularly the European Union's REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation, for the benefit of human health and the environment. REACH is also intended to enhance the competitiveness of the EU chemicals industry by removing barriers to innovation.

Since 2012 EAERE has observer status at meetings of the [Socio-Economic Assessment Committee \(SEAC\)](#) convened at the European Chemicals Agency (ECHA) in Helsinki under REACH. These take place 4 times every year. The processes of most relevance to SEAC concern the evaluation of:

- Dossiers proposing Restriction of specific chemicals, or groups of chemicals, either in the form of an outright ban, or for certain uses of hazardous substances; and
- Applications for Authorisation, where companies seek permission to use specific substances in specific applications where they would otherwise be banned.

SEAC collaborates closely with another technical committee under REACH, the Risk Assessment Committee (RAC), which has specific expertise in the risks to health and the environment of chemicals and in risk management. Dr. Mike Holland (Ecometrics Research and Consulting – EMRC, and Imperial College London) and Prof. Roy Brower (University of Waterloo) are the current EAERE delegates. Other stakeholder organisations present on SEAC are either from industries that are affected by chemicals legislation or NGOs representing the interests of civil society, for example for the protection of health and the environment. EAERE's position as a stakeholder organisation has developed to provide advice to the REACH process on the application of environmental economics. EAERE representatives do not lobby specifically for adoption or rejection of any proposals made, but provide comment on the science underpinning the arguments made.

Recent restriction proposals concern:

- The use of lead and its compounds in ammunition and fishing tackle
- Substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting
- 2,4-dinitrotoluene
- Dechlorane plus
- Per- and poly-fluoroalkyl substances (PFAS – known colloquially as 'forever chemicals') in firefighting foams

An issue that is currently under development concerns the use of qualitative argumentation and methods in making a case for restriction or authorisation, where there is limited data on costs and benefits but a decision on the proportionality of a restriction or authorisation is needed.

It is expected that a restriction dossier covering most other applications of PFAS will be submitted early in 2023. This is being proposed by the Competent Authorities of 5 countries. This application for restriction is expected to pose a number of challenges, reflecting the large number of substances (>5,000) and broad range of applications that would be affected from ski waxes to transport to clothing to non-stick cookware and refrigerants. Whilst some PFAS are recognised as toxic, there is as yet limited or no data on many chemicals in the group. However, almost all are recognised as being highly persistent. Significant levels of contamination have been reported in many locations, leading to very high clean up costs.

The work of SEAC also links to other activities that EAERE's representatives are engaged in:

- NeRSAP (Network of REACH Socio-Economic-Analysis and Analysis-of-Alternatives Practitioners) which brings together consultants and others working to develop Restriction proposals and Authorisation applications, to discuss the challenges faced and ways forward.
- The OECD SWACHE (Surveys on Willingness-to-Pay to Avoid Negative Chemicals-Related Health Impacts) Project. SWACHE has developed survey instruments for a range of health impacts. The first round addressed asthma, fertility loss, IQ loss, chronic kidney disease, and very low birth weight, and results from the first applications of these surveys are now under discussion. A second round has addressed hypertension, skin sensitisation, non-fatal cancer, IQ loss and thyroid dysfunction. Surveys for these effects have now been developed and are undergoing initial testing. The health conditions selected for inclusion in SWACHE were picked for their relevance to chemicals policy making.

Linked to these activities, one of Roy Brouwer's PhD students at Vrije Universiteit Amsterdam is currently doing an internship at ECHA for 6 months. She works with the ECHA economists on an international survey of the monetary valuation of different health endpoints for use in cost-benefit analysis.

Mike Holland, Roy Brouwer, June 2022.