

EAERE and the European Chemicals Agency, 2026

Background information

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 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 had observer status at meetings of the [Socio-Economic Assessment Committee \(SEAC\)](#) convened at ECHA 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.

EAERE observers have taken most interest in Restriction proposals from Member States or ECHA. The opportunity to comment on requests from industry for Authorisation is very limited. Areas of specific interest concern quantification and valuation of impacts/risk, and analysis of alternatives and assessment of the (economic) proportionality of action. Other relevant issues concern the need for action at the EU level and synergies with other legislation, and the appropriate point for legislative action, for example at the point of chemical production or downstream, for example in the waste phase.

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) have represented EAERE for the last decade. They are now handing over to Dr Aurelie Slechten from the University of Lancaster and Professor Frans de Vries from the University of Aberdeen. ECHA provide funding for flights to Helsinki and pay for hotels on a bed and breakfast basis. Costs of travel to and from the airport at either end and other meals are paid for by participants. Meetings can be attended remotely on most occasions.

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.

Update for 2026

EAERE's position as a stakeholder organisation was originally to provide advice to the REACH process on the application of environmental economics within socio-economic assessment. EAERE representatives have not lobbied specifically for adoption or rejection of any proposals made beyond indicating whether or not a proposal is well supported by the evidence supplied, but provide comment on the science underpinning the arguments presented. When EAERE was first appointed as a regular stakeholder observer in 2012 the knowledge of environmental economics on SEAC was limited and there was a clear role for EAERE in providing guidance. However, over time, the experience on the Committee has increased and guidance from EAERE is no longer sought in the way that it was: the chairs of the committee seems reluctant to be seen to be consulting with a specific stakeholder group. **This raises questions as to what EAERE believes its role on SEAC should be, and specifically whether its representatives should more clearly support or**

oppose dossiers that are considered by SEAC. This would require broader participation of EAERE members than has been the case so far.

Current restriction proposals concern:

- Universal PFAS (uPFAS) Restriction used in a very wide range of applications
- Octocrilene, an ingredient of sunscreens and cosmetics
- Use of certain chromium (VI) oxides, oxyacids and salts used in plating and other applications

However, there is a trend to increasing the scope of the proposals. Earlier proposals tended to be limited to single substances in single applications (lead in ammunition, mercury in measuring instruments, PFAS in firefighting foams etc). In contrast, the scope of the uPFAS proposal is extremely broad, covering a group of around 10,000 substances in multiple sectors (textiles, food contact materials, packaging, buildings, transport, ski waxes, lubricants, medical devices, electronics, power, F-gases and so on). The situation is further complicated by each of these sectors comprising multiple sub-sectors, each of which may use its own set of PFASs to different specifications. The water industry has come forward as a strong supporter of the PFAS proposal, recognising high costs to the industry if solutions to PFAS contamination are placed on downstream industries rather than those producing PFAS or using them in manufacturing.

An issue that remains 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. This particularly applies to the case of persistent substances (variously described as PBTs, POPs, vPvB, vPvM, PMTs depending on precise properties with respect to persistence [P], bioaccumulation [B], toxicity [T] and mobility [M]). Key issues include approaches to discounting, definition of the time period for assessment (an infinite timeline is not practicable), and variability in damage potential between substances. EAERE representatives have contributed to this debate.

Given that EAERE reps to SEAC are unpaid for that work and that the documentation around each meeting is extensive, it is not realistic to expect them to read everything in full. Should a particular proposal to ECHA be of wider interest to the Association it is suggested that others assist in the review of material. This would require some mechanism to highlight this work to other EAERE members that we currently lack.

Related activities

The work of SEAC also links to other activities that EAERE members are engaged in:

- NeRSAP (Network of REACH Socio-Economic-Analysis and Analysis-of-Alternatives Practitioners) which brings together consultants and others working across Europe 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, starting with asthma, fertility loss, chronic kidney disease, and very low birth weight. Results from the second batch of surveys covering hypertension, skin sensitisation, non-fatal cancer, IQ loss and thyroid dysfunction are becoming available. Work is moving on to further conditions including neuro-degenerative diseases (dementias) and neuro-developmental conditions. The health conditions selected for inclusion in SWACHE were picked for their relevance to chemicals policy making.
- RISEP (UK REACH Independent Scientific Expert Pool) which provides UK authorities with independent scientific advice and scrutiny regarding the safety of chemicals and possible regulatory action under UK REACH.

Mike Holland, Aurelie Slechten, Frans de Vries and Matti Vainio, May 2026.