EAERE and the European Chemicals Agency, 2025

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 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.

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. 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) 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.

Update for 2025

EAERE's position as a stakeholder organisation has developed 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. **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 currently.**

Recent restriction proposals concern:

- Universal PFAS (uPFAS) Restriction
- Per- and poly-fluoroalkyl substances (PFAS – known colloquially as 'forever chemicals') in firefighting foams (this was introduced to the Committees ahead of the uPFAS proposal, to prepare the Committees for some of the questions that would arise in the larger dossier).

This appears a restricted workload compared to previous years when more restrictions were considered. However, there is a trend to increasing the scope of the proposals. 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.

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 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 disfunction are to be discussed shortly. 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.

Roy Brouwer supervised Elvia Rufo, a PhD student in Amsterdam who is still working on the ECHA-OECD illness databases that were collected, as part of the collaboration with ECHA. She's testing the transferability of WTP for different health endpoints across OECD countries for use in CBA of ECHA/REACH dossiers.
The following paper was published in late 2024:
Rufo, E., Brouwer, R., van Beukering, P. (2024). The social costs of pesticides: a meta-analysis of the experimental and stated preference literature. Scientific Reports, 14: 31905. https://doi.org/10.1038/s41598-024-83298-3

Mike Holland, Roy Brouwer, June 2025.