

Helsinki, 26 January 2024

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Kristin Schreiber
Director
DG Internal Market, Industry
Entrepreneurship and SMEs

Aurel Ciobanu Dordea
Director
DG Environment

Subject: ECHA's scientific and technical support to the European Commission in 2023 on the Chemicals Strategy for Sustainability

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

Dear Directors,

During 2023, 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 2024 and beyond. This letter will be shared with ECHA's Management Board and published on the ECHA website.

Revision of the REACH and CLP Regulations

ECHA provided scientific and technical input to the Commission during the trilogues with the European Parliament and the Council on the CLP Regulation revision, until a provisional agreement was finally reached towards the end of 2023. ECHA also facilitated an info session for assistants of members of the European Parliament in April 2023. With regard to the new hazard classes, the Delegated Act came into force as of 20 April 2023, after which ECHA updated the template for CLH proposals, started to prepare the introduction of the new hazard classes in IUCLID (roll-out planned for spring 2024, in time to facilitate the transition times for industry) and started, together with the European Food Safety Authority (EFSA), the work to update the Guidance on the Application of the CLP criteria, planned for mid-2024.

As the Commission intensified its preparatory work for the revision of the REACH Regulation, at the time foreseen to be adopted towards the end of 2023, requests for contributions from ECHA also increased. ECHA's scientific and technical input was provided on possible polymer registration, the amendment of information requirements, the revision of the evaluation and restriction & authorisation chapters of REACH, ex-ante SME verification and possible ways to strengthen the enforcement of REACH.

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

Linked to the REACH revision and the large number of new tasks being proposed for the Agency, ECHA supported the Commission in its conceptual work on a future ECHA basic regulation. At the Commission's request, ECHA conducted a retrospective evaluation analysing the degree of effectiveness, relevance, efficiency, proportionality, coherence, added value and sustainability of the Committees established by the REACH Regulation. A high-level roundtable meeting was organised with the Commission colleagues to discuss the outcome and ways forward.

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, enforcement and safe and sustainable by design. In addition to participating in these working group meetings, ECHA 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 of importance 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. ECHA also intensified its collaboration with EFSA in the context of 1S1A, including a project to test the feasibility of changes in operational procedures to serve the 1S1A objective.

For the working group on indicators, ECHA took a role as technical co-lead together with the European Environment Agency (EEA), 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 2023 focused on further developing and finalising a public framework with a dashboard of indicators and a synthesis report, which are to be published in April 2024.

In addition, ECHA contributed to the Partnership for the Assessment of Risk from Chemicals (PARC) to develop EU-wide human and environmental biomonitoring. On 15 November 2023, ECHA published a [report](#) on 'Key areas of regulatory challenge 2023' that identifies areas where research is needed to protect people and the environment from hazardous chemicals. It also highlights where new methods, that support the shift away from animal testing, are needed.

New tasks for the Agency

At the request of the Commission, ECHA analysed the possible impact the reattribution of a number of new tasks to the Agency may have on its committees, key experts, data model and IT infrastructure. We also analysed the resource impact such reattribution may have on the Agency and provided technical input to the Commission during the preparation of the legal proposals. Examples here include the revision of the Groundwater, Water Framework and Environmental Quality Standards Directives, the revision of the End-of-Life Vehicles (ELV) and Restriction of Hazardous Substances in electrical and electronic equipment (RoHS) Directives, as well as the revision of the Toys Safety, Persistent Organic Pollutants (POPs) and Medical Devices Regulations, among others. For all of these the Commission has put forward legal proposals, reattributing scientific and technical tasks to the Agency.

In addition, the Commission published a legal proposal to establish a Common Data Platform, which includes a number of "data-related" new tasks for ECHA, such as the development of an EU Common Data Platform for Chemicals, a new repository of reference values, the extension of the Public Activities Coordination Tool (PACT), the hosting of the Information Platform for Chemical Monitoring (IPCHEM), a new database of study notification, a new Early Warning Framework and the establishment of an EU data generation mechanism.

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Continued commitment in 2024

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

In 2024, ECHA will roll out its new strategy for the period 2024-2028. The implementation of our current mandate as well as the increased mandate that comes with the CSS, will be front and centre. We look forward to working with the Commission and our Management Board to ensure that our priorities are aligned. However, further changes to ECHA's operating framework will be necessary to deliver on the increased expectations and legal mandate. Hence the adoption of an ECHA basic regulation remains a key priority for the Agency and we look forward to continuing to work with the Commission on this regulation in 2024.

Yours sincerely,

[e-signed]²

Dr Sharon McGuinness
Executive Director

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

² This communication has been approved according to ECHA's internal decision-approval process.