

Brussels, 24 July 2025

Subject: Joint industry call to reassess key REACH simplification proposals: Protecting European industry, innovation and vital applications

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

Dear Secretary-General Juhansone,

As representatives of multiple industrial sectors across the European economy, we are writing to express our shared concerns regarding key aspects of the ongoing REACH simplification.

Our sectors are highly interconnected. Many chemical substances and mixtures are not only vital to their own industry but also support hundreds of thousands of professionals and companies across Europe. These substances play a key role in daily applications that range from enhancing the energy efficiency of buildings, to assembling electric vehicles, enabling mobility, and maintaining critical infrastructure. Their value extends to professionals such as retailers, hairdressers and hospitality sector staff, who rely on them to deliver vital services to consumers.

We would like to bring to the Commission's attention that, above all, a truly simplified REACH must not introduce new burdens on industry. In this context, we wish to highlight the following:

Need for regulatory predictability

The European industry is affected by many pieces of EU legislation, not only the REACH Regulation, and some sectors have sector-specific legislations that they need to comply with. In reality it means that our businesses, both large companies and SMEs (which many of the signatories represent), find navigating the regulatory complexity challenging. New requirements need resource allocation and careful planning, including sequential transition periods for each operator within the supply chain.

To ensure that REACH continues to protect human health and the environment, while avoiding creating more regulatory obstacles and administrative burdens for businesses, the simplification of REACH must be effective.

Therefore, the future REACH should include a well-defined regulatory roadmap, clearly listing which substances would be worked on and when. The substances would go through an assessment on which regulatory tool is the best to use. For example: if a substance is identified to have only occupational health and safety concerns, then it would be addressed under the OSH legislation, rather than under REACH Regulation.

Through this clear roadmap, both industry and the authorities will benefit. The authorities would be able to make the best-informed decisions on which regulatory tool to use in the first place by having information about use, exposure, tonnages, alternatives, risk, and socio-economic impact data up front. The European Chemicals Agency (ECHA) would not be overburdened and could keep to their legal deadlines. Industry would have much needed predictability and companies, especially SMEs, can allocate their resources better and keep up with new regulatory developments.

The regulatory roadmap should also ensure that REACH upholds the principle that animal testing is used only as a last resort. It must be clearly demonstrated that all alternative methods and data sources have been thoroughly explored and exhausted before any testing is conducted or required.

No purely hazard-based restrictions or blanket solutions

One of the major concerns in the REACH revision is the extension of a “Generic Risk Management Approach”, which would automatically restrict substances based on hazard rather than real exposure. This removes the core principle of risk-based regulation, and its extension would:

- Ban substances used safely in low volumes or under well-controlled conditions.
- Undermine sectors where performance, durability and safety cannot be compromised.
- Lead to worse environmental outcomes if safe, long-lasting products are replaced by less effective alternatives.

A way forward would be to ensure an open and inclusive consultation process for all stakeholders and third parties through the aforementioned regulatory roadmap.

Furthermore, risk management should always ensure a thorough understanding of chemical uses and exposures, with science and data guiding decisions, avoiding restricting substances without proper risk evaluation or through using generic solutions. This also applies to the introduction of Mixture Assessment Factor (MAF) which is scientifically unproven and would apply an arbitrary safety factor on top of existing, robust chemical safety assessments. MAF would unjustly disadvantage chemicals that are currently used safely, potentially causing major disruptions in supply chains and increasing reliance on animal testing.

Lastly, we do not support a general registration or notification requirement for polymers. Instead, existing tools such as REACH restrictions, authorisations, or the Single-Use Plastics Directive should be used to address specific concerns.

Simplifying supply chain communication while strengthening enforcement

Clear communication is key - both within our industries, where information flows from upstream suppliers to downstream users, and directly to consumers. As businesses, we play a vital role in conveying critical information on the safe use of chemicals to ensure effective risk management. In today's digital age, we support the Commission to look for ways to leverage digital tools to simplify

supply chain communication. However, it should also be ensured that the electronic formats would be standardised, protected from online threats, and user-friendly interfaces are developed, which would be simple to use, especially for SMEs.

Regarding enforcement, robust mechanisms are essential to prevent non-compliant products from entering the EU market, which is why we support stronger collaboration between the EU and Member States to address the current gaps in border controls and the oversight of online sales. EU-based companies face competitive disadvantages, further exacerbated by imports that fail to meet EU standards. Furthermore, future regulatory measures must be enforceable, providing tools such as validated test methods to check compliance of mixtures and articles.

We, the undersigned, represent sectors that are the backbone of Europe's industrial, innovation and manufacturing strength, spanning construction, consumer goods and essential everyday products. We are ready to collaborate with the Commission and other stakeholders to ensure that the future regulatory framework is effective, implementable, safeguard human health and the environment, and the practical and diverse realities of European industry.

Yours sincerely,

A.I.S.E. - The International Association for Soaps, Detergents and Maintenance Products

ALIPA - The European Aliphatic Isocyanates Producer Association

AQC - The Association for Quality Assurance of Leather Bracelets Manufacturers

ATC - Technical Committee of Petroleum Additive Manufacturers in Europe

ATIEL - The Technical Association of the European Lubricants Industry

CEC - The European Footwear Confederation

CECIMO - The European Association of Manufacturing Technologies

CEPE - The European Council of the Paint, Printing Ink, and Artist's Colours Industry

CIRFS - The European Man-Made Fibres Association

CITPA - The International Confederation of Paper and Board Converters in Europe

Cosmetics Europe - The Personal Care Association

CPE - Construction Products Europe

CropLife Europe - The European Crop Protection Association

DUCC - The Downstream Users of Chemicals Co-ordination Group

EFCC - The European Federation for Construction Chemicals

EMO - European Mortar Industry Organisation

ESIA - The European Semiconductor Industry Association

ETRMA - The European Tyre & Rubber Manufacturers Association

ETSA - The European Textile Services Association

EUCTL - European Chemistry for Textile and Leather

EURATEX - The European Apparel and Textile Confederation

EUROPUR - The European Association of Flexible Polyurethane Foam Blocks Manufacturers

FEA - European Aerosol Federation

Fecc - The European Association of Chemical Distributors

FEICA - The Association of the European Adhesive and Sealant Industry

FEPE - The Federation of European Producers of Envelopes and Light Packaging

FESI - The Federation of the European Sporting Goods Industry

FPE - Flexible Packaging Europe

I&P Europe - Imaging and Printing Association

ICA - International Cellulosics Association

IFRA - The International Fragrance Association

Intergraf - European Federation for Print and Digital Communication

ISOPA - The European Trade Association for Producers of Diisocyanates and Polyols

MPE - Metal Packaging Europe



A.I.S.E. represents the detergents & maintenance products industry in Europe. A.I.S.E. has been the voice of the industry to EU regulators since 1952. Membership consists of 30 national associations across Europe, 19 corporate members, 19 value chain partners. A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services.



ALIPA was created by major European producers of aliphatic isocyanates and polyisocyanates – key components for high quality coatings, adhesives and elastomers – to encourage the safe and proper use of these materials.



The Association for Quality Assurance of Leather Bracelets Manufacturers (AQC) is a Swiss-based international Association of leather bracelets manufacturers for the Watch Industry. The Association has been officially established in June 2014 by five leather bracelet manufacturers. Its members represent approximately 80% of the worldwide leather bracelet production for Luxury Watches.



The Additive Technical Committee of Petroleum Manufacturers in Europe (ATC) was established for member companies to discuss topics of a technical and statutory nature. ATC develops common approaches to health, safety and regulatory legislation based on scientific and technical principles, to the benefit of end consumers and environmental protection.



The Technical Association of the European Lubricants Industry (ATIEL) represents the combined knowledge and experience of leading European and international engine oil manufacturers and marketers. ATIEL is the technical and innovative hub of the manufacturers, developers and marketers and promotes consensus on key technical, product stewardship and sustainability issues.



The European Confederation of the Footwear Industry is the representative body of the European footwear industry. It advocates for the sector's interests at both European and international levels, aiming to promote the competitiveness and sustainable growth of footwear companies.



CECIMO is the European Association of Manufacturing Technologies, representing 15 national associations and around 1,500 companies, mostly SMEs. Covering 97% of Europe's machine tool production and one-third globally, CECIMO supports a €25.8 billion industry with 150,000 employees, focusing on machine tools and additive manufacturing technologies.



The European Council of the Paint, Printing Ink and Artists' Colours Industry is a non-profit organisation founded in 1951. CEPE represents about 800 member companies across Europe which stand for 85% of the market value with an estimated annual turnover of €17 billion. The 100,000 direct employees predominantly work in SMEs.



CIRFS is the voice of the European man-made fibres industry, representing leading producers of synthetic and cellulosic fibres. Based in Brussels, it promotes innovation, sustainability, and competitiveness while supporting its members and advancing Europe's position as a global leader in high-quality, sustainable fibre production.



CITPA is the International Confederation of Paper and Board Converters in Europe. It was established in 1961 to represent the interests of the European Paper and Board converting industry and to promote the value of paper and board as sustainable materials. CITPA represents multinational companies and small and medium-sized firms.



Cosmetics Europe is the cosmetics and personal care association. Through its network of corporate and association members, it represents at least 80% of the European cosmetics industry in value, including more than 9,000 SMEs. Our sector covers a wide range of products and provides approximately 3 million direct and indirect jobs across the continent.



Founded in 1988, Construction Products Europe is an international non-profit making association. The association is made up of national and European associations that represent SMEs and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.



The European Crop Protection Association acts as the ambassador of the crop protection industry in Europe and represents the industry's European regional network. ECPA promotes modern agricultural technology in the context of sustainable development, one which protects the health of humans and the environment.



DUECC is a platform of 11 European associations which represent "downstream" industries. The group's main objective is to contribute, with a common voice, to the successful implementation of the REACH and CLP Regulations. DUECC aims to ensure that downstream users' needs, rights, duties and specificities are taken into account.



The European Federation for Construction Chemicals (EFCC) represents over 70% of companies and national associations active in the construction chemicals industry across Europe. Construction chemicals are primarily used to accelerate construction processes and enhance the overall sustainability and performance of buildings and infrastructure.



EMO is the voice of the European factory made mortar industry. EMO members are national associations and companies from EU & EFTA Member States. Based on Eurostat figures and own estimates, 70 % of the total mortar production volume is produced in EMO member countries, together with ETICS considered to represent 80 % of Europe's mortar revenues.



The European Semiconductor Industry Association (ESIA) is the voice of the semiconductor industry in Europe. Its mission is to represent and promote the common interests of the Europe-based semiconductor industry towards the European institutions and stakeholders in order to ensure a sustainable business environment and foster its global competitiveness.



The European Tyre & Rubber Manufacturers Association (ETRMA) represents 14 corporate members whose global sales account for 70% of the worldwide tyre market, including 8 of the top 10 industry leaders. Collectively, these manufacturers maintain a robust presence in the EU and candidate countries, operating over 80 production facilities and more than 20 R&D centres.



The European Textile Services Association represents the leading textile services companies & national associations, as well as the detergent, fabric and garment manufacturers. This industry is a major contributor to the European economy, with a current annual turnover of circa €11 billion and employing 135 000 people in the EU.



EUCTL – European Chemistry for Textile and Leather – is the Association representing at European level the Companies manufacturing chemicals for textiles and/or leather. It gathers the competences of almost 80 companies, covering more than 75% of the European production of chemicals for textiles and leather.



As the voice of the European textile and clothing industry, EURATEX works to achieve a favourable environment within the European Union for the design, development, manufacture and marketing of textile and clothing products. EURATEX focuses on clear priorities: an ambitious industrial policy, sustainable supply chains, innovation and skills development, free and fair trade.



EUROPUR is the European Association of Flexible Polyurethane Foam Blocks Manufacturers. It represents 135 organisations across the flexible PU foam value chain and its members account for ~90% of all slabstock PU foam produced in Europe.



The European Aerosol Federation was founded in 1959. Today it represents 17 European countries which include more than 300 companies active in the aerosol industry. These range from multi-national corporations to SMEs. FEA represents the shared interests of the aerosol dispenser industry in Europe by fostering collaboration through its network.



Fecc represents around 1600 companies, many are SMEs. Fecc and its members contribute to innovation and sustainability besides adding value in the supply chain, by sourcing, developing, marketing and distributing a wide range of specialty chemicals and ingredients to over one million downstream users.



FEICA represents the Association of the European Adhesive & Sealant Industry, where 85% of adhesive and sealant producers are SMEs. Adhesives and sealants (A&S) play a crucial role in many of the EU's strategic sectors and are essential enablers of countless everyday products. A&S enhance products' performance, durability and circularity.



FEPE is the Federation of European Producers of Envelopes and Light Packaging. It promotes paper-based packaging and communication, supports sustainability, and defends the industry's interests at EU level. As a founding partner of the Keep Me Posted initiative, FEPE strongly supports the right to choose how information is received - on paper or digitally.



The Federation of the European Sporting Goods Industry (FESI) represents around 1,800 manufacturers (85% of the European market). Its members include national federations and companies, 70–75% of which are SMEs. The industry employs over 700,000 EU citizens and generates an annual turnover of approximately 81 billion euros.



Flexible Packaging Europe (FPE) is the industry association representing the interests of more than 80 SMEs, and multinational manufacturers. The member companies account for more than 85 % of European sales of flexible packaging. More than half of all food products sold on the European retail markets are packed with flexible packaging.



Imaging and Printing Association is a European association of product manufacturers and technology providers for the imaging and printing industry. I&P Europe members' products include conventional and digital materials and their processing solutions, in particular inks for digital printing applications, toners, pressroom chemicals, printing plates, photographic mixtures and films as well as equipment products.



The International Cellulosics Association (ICA) is a global trade association representing the interests of manufacturers, distributors and users of cellulose and cellulose derivatives. Our goal is to provide scientific and technical expertise to support a favourable regulatory landscape worldwide, and educate stakeholders about the science and benefits of cellulose and its derivatives across various applications.



The International Fragrance Association (IFRA) is the global voice of the fragrance industry. Since its creation in 1973, IFRA has brought together global fragrance houses companies, national associations, and regional fragrance ingredient manufacturers or compounders committed to ensuring the safe use of fragrance ingredients, grounded in science and responsibility.



Intergraf is the voice of the European printing industry representing 22 national printing federations from 21 European countries. The printing industry provides 600.000 jobs in over 100.000 companies and generates a turnover of approximately €80 billion. The industry throughout Europe consists mainly of small companies, as 95% of them employ fewer than 20 persons.



ISOPA is the European trade association for producers of diisocyanates and polyols – the main building blocks used to make polyurethanes. ISOPA's mission consists of three key pillars: product stewardship, advocacy and communication.



MPE is the united voice of Europe's rigid metal packaging industry, bringing together manufacturers, suppliers, and national associations. We proactively position and support positive attributes and image of metal packaging through joint marketing, sustainability, and technical initiatives. Metal packaging contributes to the Circular Economy, supporting numerous value chains and applications.