

To:

Rt Hon George Eustice MP, Secretary of State
for Environment, Food and Rural Affairs

Rt Hon Kwasi Kwarteng MP, Secretary of State
for Business, Energy and Industrial Strategy

Correspondence care of

Dr Paul Whaley
Unit 61792, PO Box 4336,
Manchester, M61 0BW

Email: p.whaley@lancaster.ac.uk

RE: Chemical data requirements under UK REACH

Dear Secretaries of State,

As scientists, we are writing to raise our concerns about developments in UK REACH that stand to limit access to chemical risk data and potentially critically compromise the UK's ability to make evidence-based risk management decisions about chemical use. Our immediate concerns relate to recent industry proposals to reduce safety data requirements for chemicals already registered in EU REACH. While superficially appealing, we believe these proposals in fact run counter to the objectives of UK REACH. Our more general and related concerns are about how the UK has lost access to the EU chemicals database, the cost of which has precipitated the proposals to relax chemical data requirements.

Our concerns arise from our experience in generating and analysing the large amount of information that is needed for successfully regulating chemical substances. Because there are so many chemicals on the market, and the ways in which they can potentially affect health are so varied, regulating chemicals in a way that ensures their safe use is data-intensive and scientifically complex. The costs of demonstrating an acceptable degree of safety are high: testing a chemical is a lengthy and expensive process, and assessing all the evidence from those tests (plus the relevant post-market data generated by academia) is time consuming and technically highly challenging.

The only way to address the central data challenge of good chemicals regulation is through the pooling of resources. No country can go it alone on generating, collecting, and analysing so much data on so many substances. Access to central databases is essential. This is why the loss of the European Chemicals Agency's database, that houses millions of pages of information about potential health risks posed by thousands of chemical substances in everyday use, is so expensive. It is expensive not only to UK industry, which has to demonstrate safety twice, but to the UK itself, that will have to invest significant resources to manage the technical aspects of a testing and evaluation system, and build an IT system capable of making this information accessible.

The recent proposed compromise to reduce chemical data requirements for UK REACH by "grandfathering in" those which have already been registered under EU REACH, while a superficially-appealing short-term fix, will not work in the long term. A considerable number of these grandfathered chemicals will at some point need to be evaluated or re-evaluated for safety (in EU REACH, that a chemical is registered does not mean it has been evaluated, as registration is only the first step in a data-gathering and evaluation process, while already-

assessed chemicals may need to be re-evaluated in light of new data), and the relevant up-to-date information for this future evaluation will not be available when it is needed. This increases the risk of unsafe or inadequately assessed chemicals remaining on the market. If the UK desires to maintain levels of protection equivalent to EU REACH and ensure good regulation of chemicals, loss of data from the system in this way must be avoided.

Our view is that ambitions to advance on EU REACH, such as making better use of existing information, supplementing risk-relevant data with cutting-edge non-animal test methods, and recalibrating how aspects of the data are prioritised for the UK's implementation of REACH, requires ongoing access to EU REACH data. Otherwise, a regulatory infrastructure will be built that is empty of the volumes of complex, up-to-date scientific evidence that are required to sustain it. The UK can take the lead here. As research scientists we recognise that the central EU database of pooled chemical property and safety data, built up with so many UK contributions, is a starting point to develop new assessment techniques and tools. Many UK scientists are already innovating in this space. These novel research and data techniques will greatly improve risk assessment procedures, significantly benefit chemical substance stewardship within industry, and improve environmental health for all.

In the land of regulating chemicals, information is king. As scientists working in chemical risk assessment and environmental health, we urge the Government to restore access to the EU's chemical database as a keystone in developing UK chemicals policy.

Your sincerely,

Dr Paul Whaley, Lancaster University

Dr Olwenn Martin, Brunel University London

Professor Crispin Halsall CChem FRSC, Lancaster University

Dr Frances Orton, University of the West of Scotland

Professor Michael DePledge CBE DSc FRSB FRCP, University of Exeter

Professor Charles Tyler, University of Exeter

Professor Stuart Harrad, University of Birmingham

Professor Andreas Kortenkamp, Brunel University London

Dr Nicola Osborne, Responsible Research in Practice

Professor Kevin C Jones, Lancaster University

Dr William A. Stubbings, University of Birmingham

Professor C V Howard FRCPath, University of Ulster

Dr Mohamed Abdallah, University of Birmingham

Dr Andrew Sweetman, Lancaster University

Dr Laura Carter, University of Leeds

Professor Alex Ford, University of Portsmouth

Professor Jeanette Rotchell FRSB, SFHEA, University of Hull

Dr Thomas Miller, Brunel University London

Dr Alice Baynes FHEA, Brunel University London

Dr Edwin Routledge FHEA, FRSB, Brunel University London

Professor Joy Watts, University of Portsmouth

Dr Madeleine Bussemaker, University of Surrey

Mr David Gee, Brunel University

Professor Philippa D. Darbre, University of Reading

Dr Brett Sallach, University of York

Dr Fredric Windsor, Newcastle University

Dr Peter Murray-Rust, University of Cambridge

Professor Gary Fones CEnv FRSC, University of Portsmouth

Professor Hao Zhang, Lancaster University

Dr David Megson, Manchester Metropolitan University