

## ISOPA/ALIPA Statement on the Revision of REACH

**Brussels, 23 May 2022** – An important aspect of the Chemicals Strategy for Sustainability that was launched by the European Commission is the Revision of the REACH Regulation. This Revision provides an opportunity for the industry and the authorities to reflect on the current regulatory system and to envision how REACH can be improved. ISOPA/ALIPA have welcomed the public consultation, which was open until 15 April 2022, and responded to it by highlighting different opportunities and challenges that the Revision brings to the diisocyanates and the polyurethane industry.

The main mission of REACH is to protect and safeguard human health and the environment from harmful substances while also providing legal stability and predictability. A predictable regulatory system is key for the industry to invest in the innovative technologies and processes that are required to reach the goals set out by the Green Deal. The recent geopolitical developments demonstrate the need for stability and showcase the need for the EU to reduce its dependency on other regions. The REACH Revision provides here a unique opportunity to do that and to strengthen the European chemical industry by prioritizing actions that will foster innovation, growth, safety and sustainability.

To make sure that the REACH Revision provides a robust and stable environment that enables the diisocyanates industry to reach these goals, ISOPA/ALIPA call on the European Commission to focus its attention on several aspects of the legislative proposal:

- On **information requirements**, we believe that they must be targeted, proportionate and only be generated if they are of value for risk management. Increasing information requirements across the board could become a barrier for innovation, thus hampering one of the main objectives of the Chemicals Strategy for Sustainability.
- On **animal welfare**, we are convinced that unnecessary animal testing must be avoided and that a balance between safety, animal testing, and validated alternative methods is possible by applying a targeted testing.
- On **polymers**, we advocate for a risk-based approach and for an exemption or reduced registration requirements for polymeric precursors in any polymer registration scheme. This should not only apply to polymeric precursors under 'strictly controlled conditions' but to those with 'adequately controlled conditions' as well.
- On **Generic Risk Assessment (GRA)**, we do not support an extension of the approach which completely disregards exposure and use considerations, nor an extension of the GRA to professional uses.
- On the **Mixture Assessment Factor (MAF)**, we believe that a systematic introduction of a generic MAF or the applications of different MAFs is not the right approach to solve the issue of potential unintentional combined exposure.
- On the **essential use** concept, we are asking for clarification on the criteria which would be used for a substance or a product to be considered essential to society. Whereas this concept is

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presented as promoting faster decision making, the high number of derogation requests deriving from that could prove counter-productive and slow the decision process.

- Finally, we call for **coherence** between REACH and other pieces of legislation. The diisocyanates substance is an example of how the interface between REACH and OSH can work properly, with a Binding Occupation Exposure Limit (BOEL) being currently discussed and being considered as complementary to a REACH Restriction.

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For more information, please contact:

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**ISOPA** represents major European manufacturers of aromatic diisocyanates and polyols, the main raw materials used to make polyurethanes. More information on diisocyanates, their applications and ISOPA's product stewardship initiatives can be found on the [ISOPA website](#).

**ALIPA** was created by the major European producers of aliphatic isocyanates and polyisocyanates – key components for high quality coatings, adhesives and elastomers – in order to encourage the safe and proper use of these materials. You can find more information about ALIPA's objectives and initiatives on the [ALIPA website](#).