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PAGE 2: Part I – General Information about Respondents

Q1: Address	
Contact name	Frida Hök
Organisation/company	ChemSec
Country	Sweden
Email Address	
Q2: If you have a Transparency Register ID number, please provide it below. If your organisation is not registered, you have the opportunity to register now by following this link. If your entity responds without being registered, the Commission will consider its input as that of an individual/private person and, as such, will publish it separately.	95363765837-60
Q3: Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution. Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.	My contribution may be published under the name indicated; I declare that none of it is subject to copyright restrictions that prevent publication
Q4: We might need to contact you to clarify some of your answers. Please state your preference below:	I am available to be contacted
Q5: Please indicate whether you are replying to this questionnaire as:	A non-governmental organisation (NGO)
Q6: If a business or industry association, please indicate your field(s) of interest or activity(ies) - the letters in between brackets correspond to NACE codes [multiple choice]:	*Respondent skipped this question*
Q7: For businesses, please indicate the size of your business:The definition of small and medium-sized enterprises depends on the staff headcount and either the annual turnover or the balance sheet of the company. Please consult the following website: http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition/index_en.htm	*Respondent skipped this question*

Q8: Please indicate the level at which your organisation is active:	EU

PAGE 3: Part II – General Questions

Q9: How important is it in your view that there is chemical and chemical-related legislation* at EU-level in order to achieve the following objectives? (1 = not important; 5= very important)*This comprises the chemical-related provisions in all legislation within the scope of this fitness check. It encompasses legislation governing hazard identification and classification, as well as risk management measures, including chemical-related aspects of legislation on worker safety, transport, environmental protection, chemicals controls and supporting legislation, excluding REACH. The full list of legislation can be found here.The internal market of the European Union (EU) is a single market in which the goods, services, capital and persons can move freely across borders. One of the key objectives of chemical and chemical-related legislation is to have a single market for chemical substances and mixtures, as well as products containing chemicals.**

Protecting human health	5
Protecting the environment	5
Ensuring a well-functioning internal market**	5
Stimulating competitiveness and innovation	5

Q10: Do you think the EU chemical and chemical-related legislation has been effective in achieving the following objectives? (1= not effective, 5= very effective). Please only consider chemical-related provisions in the legislation.

Protecting human health	3
Protecting the environment	3
Ensuring a well-functioning internal market	3
Stimulating competitiveness and innovation	3

Q11: If you think the EU chemical and chemical-related legislation is not effective (1) or only somewhat (2,3) effective, please indicate what you believe are the main reasons for this limited effectiveness in the following table:

Protecting human health	The legislation is not effectively implemented
Protecting the environment	The legislation is not effectively implemented
Ensuring a well-functioning internal market	No opinion or not applicable
Stimulating competitiveness and innovation	The legislation is not effectively implemented

Q12: To what extent do you consider that EU chemical and chemical-related legislation has had an added value above what could have been achieved through action at a national level? (1= no value, 5= a very high added value)

EU-level legislation adds value to national level action	5

PAGE 4: Part III - Specific Questions

Q13: For businesses and industry associations - Please select the legislation that regulates or otherwise affects your sector's or your company's activities.For other stakeholders - Please select the legislation you are familiar with.

Classification, labelling and packaging (Regulation No (EC) 1272/2008)
,

REACH, Annex XIII (Regulation (EC) No 1907/2006)
,

Water Framework (Directive 2000/60/EC),

Restriction of the use of certain hazardous substances in electrical and electronic equipment (Directive 2011/65/EU)
,

Persistent organic pollutants (Regulation (EC) 850/2004)
,

EU Ecolabel (Regulation (EC) 66/2010),

Safety of toys (Directive 2009/48/EC),

Cosmetic products (Regulation (EC) No 1223/2009)

PAGE 5: Effectiveness

Q14: In the EU legislative framework for chemicals, risk management measures are, in some cases, determined directly based on the identified hazard using generic risk considerations (e.g. widespread exposure or exposure of vulnerable groups), which justify the automatic adoption of such measures. In other cases, the risk management measures are determined by a specific risk assessment that assesses the probability of adverse health and environmental effects resulting from the specific exposure scenarios associated with the proposed use(s) of the chemical. In your view, do you think EU chemical and chemical-related legislation should, in general:

b. Be more oriented towards generic risk considerations (i.e. take more cautious approaches, despite the possibility that certain uses of a chemical that are in the interest of society might be restricted)
,

If you answered a or b, please explain
An efficient, transparent, protective and innovation driven regulatory system on chemicals should as a general rule always restrict chemicals on the basis of hazard and authorise uses based on risk. Hazard identification and exposure assessment: The main difference, and advantage, of a hazard-based approach compared to a risk based one, is that it is foolproof. The complete removal of a hazardous chemical is the only way to be 100 % sure that it will no longer pose a risk. Hazard assessments are complex, but not as complex as exposure assessments that add even more levels of complexity to the equation. Hazard assessments are particularly well suited for substance properties where the effects are difficult, or even impossible, to predict over time such as for PBTs, vPvBs and Endocrine disruptors and other substances without safe thresholds. The classification of a chemical as hazardous sends a clear signal to the market that such properties are not wanted, and should be phased out. The hazard classification then becomes an incentive to develop alternatives with better hazard properties or find alternative techniques, hence becoming a driver, rewarding innovation and substitution to be a safer alternative. The identification and restriction of substances based on hazardous intrinsic properties is

also easy to communicate throughout the supply chain. The information is not “filtered” depending on how it is used, meaning that the same information is available to all actors independent on usage and place in the supply chain. Classification data is also readily available through the CLP regulation and in the REACH registration dossiers. Due to the lack of available and reliable exposure data many companies see hazard based cut-offs as the only way to go. Also, many companies close to consumers just can’t risk their reputation based on a shaky risk assessment and refer to that when their customers ask them questions on presence of hazardous substances in their products. The hazard based identification will hence assist companies in their internal prioritisation of chemicals for phase out while the particular presence and potential for exposure (risk profile) will contribute to deciding the phase-out order. The same approach applies to regulators when deciding on what chemicals to prioritise for regulation. Risk-based regulation Having a strictly hazard based cut-off might sometimes be a too blunt instrument to use and that's why the risk based approach sometimes if a good way forward to complement the hazard assessment. Hence, neither hazard, nor exposure alone can facilitate the prioritisation of which substances to address with highest urgency. To be able to prioritise, we need to have both dimensions of information on exposure and use as well as hazard. The basis for risk assessment is the un-scientific belief that risk can be foreseen and controlled. In an infinitely complex system, such as chemicals, the risk is simply impossible to anticipate. The unknown factors are usually far too many and impossible to foresee. The unforeseeable cannot be predicted nor assessed. To be able to make an as good as possible risk assessment, it requires full transparency of both uses and users in the supply chain, something which is not the case today due to lack of communication as well as business confidentiality. Moreover, chemicals often act in combination with others, the so-called “cocktail effect”. This is difficult to foresee and hence not possible to include in a risk assessment. Risk assessments are also expensive and time-consuming and even if modern technology is available to assess use and exposure in the supply chain, it is in many cases not possible due to confidentiality claims. It is likewise a daunting task to communicate the hazard profile and safety instructions down the line of a globalised industry. In US the legislative system is risk based. Companies can use a substance until the EPA (environmental protection agency) proves the substances pose a risk. The result of the US system is 10 regulated substances in cosmetics on federal level. This should be compared to EU who uses a hazard-based approach and restricts around 1300 hazardous substances in cosmetic products. Looking at these numbers you realise the level of protection is much lower in the US due to the inefficiency in their risk-based system. On a regular basis, scientists discover damage to human health or the environment caused

by factors that were never considered in any risk assessment, or because assumptions made in the risk assessments were simply wrong. Experiences from the past have shown that actual exposures have often been underestimated when certain uses were not known or what were thought to be 'closed systems' are actually found to result in exposure. This holds especially true for wide dispersive uses and consumer products, which are not always used in the way they were intended. In industrial and professional uses, exposure can be fairly well predicted but even under such controlled uses with trained professionals, risk mitigation instructions for handling and use tend to not be adhered to, especially if they are far reaching and seen as cumbersome by the operators. Do not reintroduce an inefficient system The REACH white paper (called the white paper on a strategy for a future chemicals policy) published in 2001 was clear in it's analysis of the previous EU system for hazardous substances. It concluded the system was inefficient and that hazard identification and hazard assessment needs to be used in the new system to make it more efficient. REACH, due to this, builds on hazard identification and have up to now over 160 of chemicals identified as substances of very high concern (SVHC) on the Candidate list. In the next steps of REACH risk comes into play and the process slows down. For example, only 18 substances have been restricted in REACH during all these years (since 2007). The cost for member states to submit the background data for these restrictions have been extensively high- risk assessments is very costly. Also the authorisation part of REACH has risk elements included – leading to very few substances on authorisation list. Also in the recast of the biocide regulation hazard based cut- of criteria was introduced to make the regulation fit for purpose. This was due to previous risk approach had proven to be inefficient, resulting in very few restrictions even for well known hazardous substances. Companies benefit from hazard based regulation Consumer close companies with a brand reputation at stake do not want to risk their reputation by selling product with hazardous chemicals. If regulation is not strict enough they need to develop their own list of restricted chemicals. These companies benefit from hazard based identification since this helps them in prioritising substances for substitution. For example the delay of EDC criteria has lead to many companies have done own restricted EDCs lists based on the EDCs present in the public debate. Also investors include sustainability into their rating to a larger extent nowadays. Sustainability investors have done this for many year but we see this also happening for mainstream investors. To evaluate company production of hazardous chemicals is an integral part of many rating agencies work today. These investors also benefit from hazard classification and regulation to guide them in their work. Finally, it's clear that many companies are very hesitant to hazard classification if it concerns any of their own products since this is such a clear and official signal the substance is hazardous. These companies naturally

substance is hazardous. These companies naturally prefer a risk-based approach where the outcome is not that clear to the general public but depends on use and exposure.

Q15: In your view, apart from the hazard and/or risk of a chemical substance or mixture, are all relevant considerations taken into account in regulatory decision making on risk management (e.g. whether there will be combined effects of chemicals, whether there are certain vulnerable groups, whether there will be impacts on jobs or on the competitiveness of EU industry, etc.)? Please explain your answer.

No,

If you answered no, please explain which considerations are not (sufficiently) taken into account and, if relevant, explain which legislation you are referring to.
Mixtures, lack of information and vulnerable groups are not taken into account accuratley by the regulations. Cost for industry to comply with regulation tend to be heavily overestimated. The ChemSec report ”Cry Wolf” from 2015 describes this well: http://chemsec.org/images/stories/publications/Chemsec_Cry_wolf_150701.pdf Benefits of regulation might in many cases be more difficult to assess and calculate but are nevertheless just as important to include to get the full picture of the implications. ChemSec, in February this year, released a report on the issue, benefits for companies, called ”The bigger picture”. This report can be of great use when evaluating business benefits of regulation. http://chemsec.org/images/The_bigger_picture_160217_print.pdf ChemSec has due to our close cooperation with progressive companies (we have since many years back a business group: http://chemsec.org/what-we-do/business-dialogue/chemsec-business-group/participants) gained insights in these companies chemical management systems and we know that regulation provides an important basis for their efforts and progress. These companies use hazard assessments to a large extent to know what substances to prioritise for phase out. Many of them also state that it’s crucial for their reputation to take a hazard approach since costumers would not accept any risks. This issue is also elaborated in “The Bigger Picture”.

Q16: In your view, to what extent are the following elements of the overall EU legislative framework for chemicals satisfactory? (1= not satisfactory, 5= very satisfactory)

Transparency of procedures	3
Speed with which hazards/risks are identified	1
Speed with which identified risks are addressed	1
Time to allow duty holders to adapt	2
Predictability of the outcomes	3
Stability of the legal framework	5
Clarity of the legal texts	3
Guidance documents and implementation support	4
Effective implementation and enforcement across Member States	1

Consistent implementation and enforcement across Member States	1
Public awareness and outreach	1
International collaboration and harmonisation	I don't know
Please explain your answers and list any other aspect you consider relevant. If you have specific legislation in mind, please specify it.	The process of harmonised classification is slow and risk processes are very slow. This processes needs to be speeded up in making the regulations more efficient. In some cases industry are given too long time to adapt to regulatory changes, this might slow down substitution and innovation and in some cases disfavor producers and users of alternatives. Having more interaction between the different pieces of regulation would also make the chemical regulation in the EU more efficient. When a substance is regulated in one framework, a system should alert all relevant bodies and trigger actions within these accordingly. This would create less inconsistency, higher level of protection for human health and the environment, easier communication and more predictability for industry. ChemSec propose when a substance is restricted in regulation X this should trigger a restriction in regulation Y, Z and an evaluation in regulation A; B and C. In addition to taking care of inconsistencies in regulations, evaluations could be used for more than one regulation, which would make much better use of resources. A structural change like this would be very much in line with the ideas of better regulation. Another problem with not having the regulations interacting more efficiently is that some regulations are difficult to fulfil due to lack of regulations in other areas. For example the Water framework directive (WFD) that sets limit values for a number of substances in water but have not incentives to influence upstream regulation. For example if the WFD is breached by a certain substance and it’s source is identified, WFR has no mandate to influence the regulation covering the actual source. Many of the chemical regulations do not include environmental aspects; their focus is merely on health. For example cosmetic regulation and pharmaceutical regulation do not have environmental aspects included which is a clear gap since these substances to a large extent end up in the environment via the drain or the waste bin. Today different bodies evaluate substances for their hazard properties. Sometimes these bodies come to different results, which leads to frustration and confusion. Moreover, the different pieces of regulation do not make use of each other’s evaluations, leading to unnecessary work and inconsistent levels of protection for human health and environment. The most logical is to

have one body, the European Chemicals Agency (ECHA, in charge of all evaluations to avoid unnecessary overlap of work and create more consistency in the actual work. ECHA has proven to be more transparent in the process and done more accurate evaluations so far. The information in CLP is applicable in all kinds of chemical regulations, but as of today some information in CLP is not harmonised with other regulations. In order to have a more efficient regulatory system, harmonised information is key. ChemSec therefore propose to put more effort and resources to make the CLP process more comprehensive and efficient within the REFIT process. Even though the CLP have classifications on for example sensitisation and carcenogicity, there are still relevant human health and environmental endpoints missing. To add additional classifications on a number of environmental endpoints (like Persistent (P), Bioaccumulatation (B), PBT, vPvB and EDC) and human health (EDC, Neurotoxicity, allergenic properties, nanomaterial) would be the most logical way forward. The process of harmonising classification is slow and cumbersome, which in turn leads to that the time harmful chemicals stays on the market are dragged out. A change in this process to achieve faster harmonisation of classifications should be considered. When no harmonised classification exists, companies should do their own classification of their substance. As a start, these self-classifications should be used as triggers for harmonised classification.

Q17: In your view, to what extent are the following elements of risk management satisfactory? (1= not satisfactory, 5= very satisfactory)

Hazard identification criteria	2
Risk assessment and characterisation	1
Hazard and risk communication measures to consumers (e.g. labels, pictograms, etc.)	3
Hazard and risk communication measures to workers (e.g. labels, pictograms, safety data sheets etc.)	3
Risk management measures restricting or banning the use of chemicals	2
Risk management measures regulating the safe use of chemicals (e.g. packaging requirements or requirements for the use of personal protective equipment)	I don't know
If you answered 1, 2 or 3 above and would like to provide further information (in particular on specific pieces of legislation), please explain your answers.	Hazard based classification criteria are needed for EDCs (potency not included) as well as for PBT substances. Hazard based classification is a baseline in the EU regulatory process and needs to be strengthen and made more efficient. The hazard criteria are satisfactory for the endpoints covered. The basis for risk assessment is the un-scientific belief that risk can be foreseen and controlled. In an infinitely complex system, such as chemicals, the risk is simply impossible to anticipate. The unknown factors are usually far too many and impossible to foresee. The unforeseeable cannot be predicted nor assessed. To be able to make an as good as possible risk assessment, it requires full transparency of both uses and users in the supply chain, something which is not the case today due to lack of communication as well as business confidentiality. Moreover, chemicals often act in combination with others, the so-called “cocktail effect”. This is difficult to foresee and hence not possible to include in a risk assessment. Risk assessments are also expensive and time-consuming and even if modern technology is available to assess use and exposure in the supply chain, it is in many cases not possible due to confidentiality claims. It is likewise a daunting task to communicate the hazard profile and safety instructions down the line of a globalised industry. Pictograms are good but could probably be made more easy to understand for consumers.

Q18: Safety data for chemicals is subject to quality requirements, notably Good Laboratory Practice (GLP), aimed at ensuring the reliability and reproducibility of the data. Do you consider these requirements to be appropriate?	No, If you answered no, please explain your answer Yes but other data should also be used. GLP should not be used to judge the quality of research studies studies. Systematic review criteria should be used for all studies.

PAGE 6: Efficiency

Q19: In your view, what are the most significant benefits generated for EU society by the EU chemical and chemical related legislation? (one or more answers possible)	Reducing the exposure of consumers and of citizens in general to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc. , Reducing the exposure of workers to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc. , Reducing the damage to the environment and to eco-systems and, therefore, avoiding the costs of treating contaminated water, restoring impacted fisheries, cleaning-up of contaminated land, compensating for reduced crop pollinisation, etc. , Encouraging research and innovation, generating new jobs, and improving the competitiveness of the EU chemicals industry by encouraging/supporting a shift towards green, sustainable chemistry and a circular economy
Q20: In your view, what are the most significant costs incurred by EU society due to EU chemical and chemical related legislation? (one or more answers possible)	Costs for authorities at EU level , Costs for authorities at national level , Costs for society in general
Q21: In your view, do any of the following requirements in the legislative framework lead to significant costs for companies?	We do not view the business costs of meeting EU chemicals legislation to be significant , Other (please specify) industry tend to heavily overestimate their costs to comply with environmental regulation. The ChemSec report ”Cry Wolf” from 2015 describes this in detail: http://chemsec.org/images/stories/publications/Chemsec_Cry_wolf_150701.pdf Moreover, many companies benefit from strict chemical regulation. ChemSec released a report on benefits for companies called ”The bigger picture”in February this year. This report can be of great use when evaluating business benefits of regulation. http://chemsec.org/images/The_bigger_picture_160217_print.pdf Also investors include sustainability into their rating to a larger extent nowadays. Sustainability investors have done this for many year but we see this also happening for mainstream investors. To evaluate company production of hazardous chemicals is an integral part of many rating agencies work today. This also leads to benefits for the companies having a proactive chemical management.

Q22: Are there specific requirements in the EU chemicals legislative framework which lead to particularly significant costs for authorities?	Yes, If you answered yes, please indicate what these are. Risk assessments are very costly, especially when the burden of proof is on authorities and not on industry. A change in this would ease the burden for authorities and be in line with polluter pay principle. Explanation of reply to Q20: the largest cost is borne by society via health and environmental harm and insufficient protection (a number of studies show this). Cost for authorities at EU level and National level is mainly from risk assessment when burden of proof is on them.

PAGE 7: Relevance

Q23: To what extent has the EU legislative framework for chemicals contributed to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives? (1= no contribution, 5= a large contribution)

Framework has led to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives	4

Q24: To what extent does the existing EU legislative framework sufficiently address emerging areas of concern, e.g. arising from advances in science and technology? (1= emerging areas of concern are not sufficiently addressed, 5 = emerging areas of concern are sufficiently addressed)

Novel areas of concern sufficiently addressed by framework	1
Please comment	EDCs, mixtures, nano, neurotox. Very slow process to move forward with these well known hazards.

PAGE 8: Coherence

Q25: Please indicate the extent to which you agree with the following statements relating to the EU chemicals legislation framework overall

The EU chemicals legislation framework contains gaps and missing links	Agree
The EU chemicals legislation framework has overlaps	Neutral
The EU chemicals legislation framework is internally inconsistent	Neutral

Q26: Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between the different pieces of legislation which are under the scope of this fitness check. Please only consider aspects related to hazard identification, risk assessment and risk management of chemicals. The legislation covered by this fitness check can be found here.

Gaps or missing links	EDCs, Environmental aspects not included in all chemical regulation even if the products eventually end up at the same place (for example cosmetic and pharmaceuticals)
Overlaps	Hazard assessment done by different bodies, evaluations done but not used for all regulations, ChemSec propose when a substance is restricted in regulation X this should trigger a restriction in regulation Y, Z and an evaluation in regulation A; B and C.
Inconsistencies	for example Triclosan – restricted for use in soaps and shampoos used by medical professionals but allowed to be used in soaps for consumer use. Biocides – Substances restricted in biocides are present in finger paints for children since there is a lack of environmental aspects included in the toys directive.

Q27: Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between legislation which are covered by this fitness check and any other legislation you consider relevant as regards the regulation and risk management of chemicals.

Some industry argue workers protection regulation (OSH) should trigger the use of article 58.2 in REACH (exception from authorization if the chemical is regulated under an equivalent legislation). However, looking at the proposed numbers for some chemicals and knowing the different scope of the two regulations it is crystal clear that workers protection legislation could not qualify as equivalent to REACH and therefor 58.2 of REACH could not be used in these cases.

PAGE 9: Part IV: Specific questions on the CLP Regulation

Q28: CLP communicates hazards to workers and consumers through various label elements, including danger words, pictograms, hazard statements and precautionary statements. (1= not effective; 5= very effective)

To what extent are CLP labels effective in communicating hazards to workers?	I don't know
To what extent are CLP labels effective in communicating hazards to consumers?	I don't know

Q29: Do the hazard classes in the CLP Regulation cover all relevant hazards?

Environmental	No
Physical	I don't know
Human health	No
Please list any hazard classes that are not covered	Persistent (P), Bioaccumulatation (B), PBT, vPvB and EDC, Neurotoxicity, allergenic properties, nanomaterial

Q30: How effective is the support to companies through formal guidance documents and national helpdesks? (1= not effective; 5= very effective)	
Guidance documents	No experience
Helpdesks	No experience
Industry association guidance and materials	No experience
Other (training, conferences, etc.)	No experience
Q31: To what extent is CLP enforced in a harmonised manner across Member States?	Enforcement is not harmonised across most Member States
Q32: To what extent are the current elements relating to the CLP classification criteria satisfactory? (1= not satisfactory; 5= very satisfactory)	
Ease of implementation for duty holders	I don't know
Appropriateness of classification criteria and methods for substances	2
Appropriateness of classification criteria and methods for mixtures	2
International harmonisation through the Globally Harmonised System (GHS)	I don't know
If you answered 1, 2 or 3 and would like to provide further information, please explain your answer	It takes too long time to adapt to new science. Precautionary principle should be used to a larger extent.
Q33: CLP is revised on a regular basis through adaptations to technical progress. Do transitional periods allow sufficient time to implement new or revised classification criteria?	Transtion period is too long, Please elaborate if you answered that the transition period is too short or too long. Transition periods are too long, leading to known hazards being unregulated for an acceptable long time.
Q34: To what extent are the current elements of the procedures for harmonised classification & labelling (CLH) satisfactory? (1= not satisfactory; 5= very satisfactory)	
Transparency of the procedures	4
Involvement of stakeholders	4
Quality of scientific data and related information	I don't know
Speed of the procedure	1
If you answered 1, 2 or 3 and would like to provide further information, please explain your answers	The process of harmonising classification is slow and cumbersome, which in turn leads to that the time harmful chemicals stays on the market are dragged out. A change in this process to achieve faster harmonisation of classifications should be considered. When no harmonised classification exists, companies should do their own classification of their substance. As a start, these self-classifications should be used as triggers for harmonised classification.

PAGE 10: Part V: Additional comments

Q35: In case you have any additional comments with relevance for this public consultation, please insert them here.	On circular economy it is in the greatest interest of all advocates of the circular economy that the quality of secondary material is maintained. If not, reuse and recycling will not become an attractive option. In order to achieve a truly sustainable and safe circular economy, we must accept that not all materials can be reused or recycled, since they may contain unwanted substances that should not re-enter the market. Producers and downstream users need to be able to trust that the material they use is clean enough to keep customers safe and their brand reputations unharmed. This calls for traceability and making sure that hazardous substances are not diluted into materials of higher quality. The success of Circular Economy is therefore dependent on virgin and recycled materials that are free from hazardous substances. To further highlight our concern and present our preferred way forward ChemSec will forward two reports (Cry Wolf and Bigger picture) and five position papers (REACH-OSH, Circular economy, Hazard-risk and REFIT) to the mail below