Your Voice In Europe: ROADMAP feedback for Operation of the REACH Regulation - Report and REFIT evaluation

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Related document: Operation of the REACH Regulation - Report and REFIT evaluation

Feedback:

There is nothing more fundamental to the REACh Regulation than the principle embodied in its recitations and articles, "no data, no market'.

Yet two audits of REACh Registrations, using different methods, both found ~80% of the easily-found published toxicity studies on each audited chemical were not mentioned in the publicly available registrations.
- http://www.clientearth.org/reports/reach-registration-and-endocrine-disrupting-chemicals.pdf
- http://www.eeb.org/EEB/?LinkServID=53B19853-5056-B741-DB6B33B4D1318340 (see columns S, U & W in the spreadsheet linked in the Annex have the results of that part of the audit).

How is the EU supposed to ensure the safety of chemicals with so much missing data; as well as the fact that academia's studies are higher quality than industry's? (see attached published 'Hypothesis Review').

When presented with this summary, EChA staff deny their legal mandates; e.g. that there is no mandate to find "all available data" (that is at the top of Annex 1, or 2 (the one that spells out the information to be submitted in registrations. THIS IS SCANDALOUS--even NGOs think the main problem in Registrations is to ensure that industry submits one study per endpoint that meets REACh's requirements.

I realise that the MSCmtee, can supply the missing data in any registration, but it is industry's job, while government is supposed to enforce it (e.g. the MSC). The MSC will verify for you that many registrations, svn of HPVs, contain not one published finding (and that on average, most are missing).

The missing data and RAC's unwillingness to consider anything but industry's insensitive (to find toxicity) studies mean that REACh has ENTIRELY FAILED. I challenge you to rebut this claim specifically.

Feedback file:
jat3396.pdf