

To:

To: Rt Hon Thérèse Coffey MP, Secretary of State for Work and Pensions
Rt Hon George Eustice MP, Secretary of State for Environment, Food and Rural Affairs
Rt Hon Michael Gove MP, Chancellor of the Duchy of Lancaster
Rt Hon Kwasi Kwarteng MP, Secretary of State for Business, Energy and Industrial Strategy
Rt Hon Rishi Sunak MP, Chancellor of the Exchequer
Rt Hon Liz Truss MP, Secretary of State for International Trade

Dear Secretaries of State,

25th February 2021

We write regarding the recent letter you received from UK trade associations calling for changes to the UK's REACH regime for regulating chemicals. Their letter proposes that the UK chemicals regulator should rely on basic and publicly available data from EU REACH for the vast majority of substances notified with UK REACH, and only request full datasets for chemicals of "most concern to the UK".

We appreciate the serious concerns of industry about additional costs and burdens. Industry figures have been warning about potential costs for a long time, and there are already significant challenges for UK REACH to replicate the protections and transparency of the EU REACH system.

This new proposal, however, would be a major weakening of the current UK REACH regime. It would significantly reduce the ability of the regulator to take action to protect the environment and public and workers' health from hazardous chemicals. An approach that requires the regulator to constantly ask for more data would create delays and more bureaucracy, increasing risks to human health and the environment and decreasing public confidence in the system.

While many synthetic chemicals have improved the quality of our lives, some have adverse effects on ecosystems or increase the risk of serious illness. Harmful chemicals are found in many everyday products, from furniture and cosmetics, to toys and clothes. Some chemicals are so persistent it will take centuries for them to degrade in the natural environment, including those with links to cancers, thyroid disease, obesity and reproductive problems.

The aim of chemicals regulation should be to establish the chemicals which pose serious risks to our health and the environment and to put in place measures to ensure that they are used safely, or not at all. It is a dynamic process that depends on access to detailed safety information. Good regulation should also ensure that the public purse does not bear the brunt of the consequences of poor chemicals management, such as in the form of increased costs to health services and environmental protection. It is estimated that restricting the use of hazardous chemicals under EU REACH will generate health benefits of €2.1bn/year, at least [four times](#) the value of the associated costs to industry from substituting the restricted chemicals.

Adopting measures such as those proposed by the industry would undermine the 'no data, no market' principle that ministers have said will remain at the core of UK REACH. It would leave the new UK regulator with insufficient data to regulate chemical use safely, including as new concerns emerge. And it would create a system similar to the discredited and ineffective EU 'Existing Chemicals' process that preceded REACH. The delays and regulatory inaction under this system were a driving force behind the creation of EU REACH, in which the UK played a major role.

The government has repeatedly promised to maintain and enhance environmental protections. Its flagship Environment Bill commits to retain the "fundamental principles" of REACH, which includes 'no data, no market'. Reducing requirements for safety data would therefore not only set chemicals regulation back decades but represent a clear deregulation of chemical governance, breaking a key environmental promise.

We would be grateful if we could meet with the Business Secretary to discuss the issues we raise in this letter and to explore the alternative options for avoiding the costs and burdens on industry that do not undermine the level of public health and environmental protection the UK currently enjoys.

Yours sincerely,

Dr Michael Warhurst, CHEM Trust
Shaun Spiers, Green Alliance
Helen Lynn, Alliance for Cancer Prevention
Jamie Cook, Angling Trust
Thalie Martini, Breast Cancer UK
Matt Shardlow, Buglife
Dr Becky Gait, Fidra
Hugh Knowles and Miriam Turner, Friends of the Earth
Deborah Burton, From Pink to Prevention
Liz O'Neill, GM Freeze
Janet Newsham, Greater Manchester Hazards Centre
Hilda Palmer, Hazards Campaign
Sandy Luk, Marine Conservation Society
Nick Mole, Pesticide Action Network
Nick Measham, Salmon & Trout Conservation
Jo Lewis, Soil Association
Jamie Page, The Cancer Prevention & Education Society
Emma Rose, Unchecked UK
Richard Benwell, Wildlife & Countryside Link
Chris Butler-Stroud, Whale and Dolphin Conservation
Craig Bennett, The Wildlife Trusts
Kate Metcalf, Woman's Environment Network