ISOPA position on the simplification of the EU REACH Regulation

July 2025

ISOPA supports a REACH revision that upholds health and environmental protection while fostering competitiveness and innovation. ISOPA calls for a smarter, and simpler regulatory framework that is science-based, enforceable, and aligned with the realities of our industry.

Simplification for industry and enforcement are a prerequisite for a resilient chemical industry

The European chemicals sector is facing unprecedented regulatory complexity. The REACH revision must deliver real simplification not only for authorities, but also for industry. It is crucial to streamline requirements and reduce duplicate obligations, avoid a one-size-fits-all model and instead tailor assessments based on realistic risk and exposure. Simplification must result in a clear, predictable system that strengthens the EU Single Market and secures long-term investments while minimising bureaucracy.

Effective regulation requires effective enforcement. Disparities in enforcement across Member States and the rise of online and imported non-compliant goods threaten EU industry. ISOPA supports stronger involvement of the ECHA Enforcement Forum in legislative design. Enforcement criteria must be considered during the rule-making process.

Avoid additional regulatory requirements for polymers

Polymers are currently exempt from REACH registration due to their complexity, inherent stability and lower risk. In REACH 2006, they were exempted on purpose from registration to boost innovation. Their safety is already addressed through restrictions, authorisations, and hazard classifications as well as application specific regulations, e.g. food contact or medical device.

REACH registration requirements are tailored for small molecules and are not suitable for polymers, which are far more complex. With an estimated 200,000 to 400,000 polymers on the EU, extending registration to polymers would overwhelm both industry and ECHA while exceeding existing substance registrations by far with very limited benefit for human health and the environment.

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No standardised testing methods exist for polymers, and developing them would require significant time, expertise, and resources. Even a notification-only approach would generate a flood of submissions, creating administrative bottlenecks.

Therefore, before taking any action on polymers, an overall strategy to streamline any regulatory approach is needed.

Avoid overextension of the Generic Risk Approach

ISOPA opposes the broadening of Article 68(2) under REACH to additional hazard classes without full risk and socio-economic assessment. Generic bans based on hazard alone overlook exposure, use considerations, and societal value. Broad triggers can result in unworkable scopes and retrospective regulatory fixes.

A generic approach to risk assessment contradicts the OSH legislation by restricting even uses that are deemed safe according to workplace risk assessment. It does not acknowledge education/training or organisational and technical measures implemented in line with OSH legislation. ISOPA therefore urges the Commission to maintain a balanced approach using full risk assessment.

Use evidence-based alternatives to a blanket Mixture Allocation Factor

ISOPA opposes an introduction of a generic Mixture Allocation Factor (MAF). Current science does not support its universal application. Studies confirm most environmental mixtures pose no concern and risk drivers are few and well-managed. Moreover, human biomonitoring data is limited and does not justify regulatory overhaul. ISOPA therefore calls for improving existing legislation and targeted measures rather than introducing MAF under REACH.

Overall, ISOPA calls for a REACH revision that aligns regulatory ambition with practical feasibility. A simplified, enforceable, and science-based framework is essential to protect both public health and the European industry's global leadership.

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**.

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