

**Answer to:** [Roadmap for chemical strategy for sustainability](#)

**Feedback:**

Stockholm University Baltic Sea Centre welcomes the initiative to increase the level of protection of the environment from hazardous chemicals and believes that this needs to be the guiding principle before, not on par, with promoting innovation. The costs from loss of health and biodiversity may prove to be very high. Clear protection goals are therefore needed to make this the overarching rule.

We further strongly agree with the statement that the regulatory framework on chemicals needs to be strengthened. Two aspects of this are crucial for overcoming the gaps, overlaps and inconsistencies stated by the European Commission, namely to manage chemicals in groups and introduce mixture risk assessments into all chemicals legislation.

Science no longer deems the single substance assessment approach to be sufficient to assess and control the risks associated with the chemical exposure of the modern world. The risk associated with a chemical mixture exceeds the risk of each individual chemical in the mixture. This needs to be reflected in European chemical legislation.

- Establish consistent requirements for mixture risk assessments in all pieces of chemical legislation. Without such requirements, effective protection against risks from exposure to mixtures will not occur.

Today there are inconsistencies between the different regulatory frameworks covering chemicals, with only little exchange of information between them and no overarching or systematic attempts to harmonise across. Consequently, the risk assessment of chemicals is largely carried out in regulatory silos – dictated by how and in which sector the individual chemicals are used, rather than by their exposure patterns and interactions with other chemicals in real-life scenarios. In order to move towards “one substance – one assessment”:

- Establish a crosscutting European policy framework for dealing with mixtures of chemicals falling under different legislations. Chemical mixtures cannot be fully evaluated and managed by sectorial pieces of legislation.

Managing chemicals in groups has been identified as a key approach for making regulatory risk assessment and management less fragmented and more transparent. Organising chemicals with similar molecular structure, hazard, risk, or function into well-defined groups helps to reduce the complexity of chemical risk assessment and management.

- Strengthen the mandate in REACH to manage groups of chemicals to avoid regrettable substitution. Grouping will also contribute to increase efficiency and to reduce mixture risks.

For achieving and maintaining good chemical status of water bodies under the WFD, the current focus on a limited number of priority chemical substances is insufficient to deal with the present situation, where hundreds of different organic chemicals can be found in water samples. With no obligation to perform mixture risk assessments – combined with the fact that there is no clear mandate in the directive to group substances when developing quality standards – there is room for improvement.

- ➔ Improve mixture risk assessment and grouping of substances in the context of European water management. The directive is recipient-oriented and in principle should be able identify and undertake measures against chemical pollution created by chemical mixtures.

To read our policy brief "Time for smarter and safer chemical management" please visit: <https://balticeye.org/en/policy-briefs/time-for-smarter-and-safer-chemical-management/>