Jessica Roswall

Commissioner for Environment, Water Resilience, and a Competitive Circular Economy

Stéphane Séjourné

Executive Vice-President for Prosperity and Industrial Strategy

Subject: Strengthening the implementation and enforcement of regulations on chemicals in order to protect public health and the environment from hazardous substances

Paris, 11 september 2026

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

Given the stalemate surrounding the comprehensive reform of the Regulation on the Registration, Evaluation, and Authorization of Chemicals (REACH), we are writing to ask you to strengthen the protection of human health and the environment against the risks posed by the most harmful chemicals through additional measures. This revision was intended to be the central tool for improving health protection against chemicals; it is therefore essential to explore other methods to continue making progress toward this goal.

The EU's Chemicals Strategy for Sustainability (CSS) has identified the policy actions needed to better protect citizens and the environment and to stimulate innovation toward safer solutions. Although several measures included in the CSS, as well as commitments made under other EU initiatives such as the European Cancer Plan and the "Zero Pollution" Action Plan, require a comprehensive revision of the REACH Regulation, **significant protections can nevertheless be put in place through better implementation and enforcement of the regulations**.

That is why we are calling on you to support:

- **The phased-out elimination of key endocrine disruptors (EDs) by urgently advancing restrictions targeting well-known groups of EDs** such as bisphenols, phthalates, flame retardants, and siloxanes, as already outlined in the European Commission's roadmap on restrictions—the EU's plan to restrict the most harmful chemicals. Implementing this measure without further delay requires your political leadership.
- **Ensure a comprehensive and protective restriction on PFAS**, in accordance with the proposal put forward by five European countries and as now endorsed by the experts of the Risk Assessment Committee (RAC) and the Socio-Economic

Analysis Committee (SEAC) of the European Chemicals Agency (ECHA). In its opinion dated March 2, 2026, the RAC supported restricting the manufacture, use, and sale of PFAS, with as few exemptions as possible. A few notable points from the RAC's conclusions are worth highlighting: the grouping of PFAS is scientifically justified; there are no safe emission levels; and a universal restriction without exceptions would reduce pollution by 96%. It is now essential to turn words into action. To ensure effective protection of health and the environment against PFAS and to avoid considerable costs to society — particularly in terms of healthcare, water treatment, and soil contamination — it is crucial that the restriction cover all uses and all sectors without exception. All exemptions must be strictly limited in time and to specific applications that are essential to society. Short-term competitiveness cannot be an excuse for inaction, considering the rising costs for human health, biodiversity, and all our supply chains that are heavily dependent on healthy ecosystem services. Moreover, it makes economic sense in the long term to foster European innovation by regulating outdated and dangerous chemicals.

- **Strengthen the implementation and enforcement of regulations on chemical substances.** ECHA's recent five-year report highlights widespread non-compliance with obligations under the REACH and CLP regulations, including incomplete registration files, persistent gaps in data regarding key hazards such as endocrine disruption and nanoforms, as well as insufficient information on the supply chain. It is particularly noteworthy that 54% of active registration dossiers have not been updated since 2021, while 16% have not been updated in a decade, despite legal obligations to keep the information up to date. Combined with significant delays in the enforcement of regulations, these shortcomings delay risk management measures and leave people and the environment inadequately protected against hazardous chemicals.

We remain at your disposal to discuss these proposals with you in more detail during a meeting.

Please accept, Executive Vice-President, Commissioner, our best regards.

Nicolas Richard

President of France Nature Environnement

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