Humane World for Animals

Formerly called
Humane Society International

Humane World for Animals' position on the uncertain future of REACH

March 2026

The EU chemicals regulatory framework under REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals) has long been recognised as a cornerstone of European chemicals policy. Its core objectives, ensuring a high level of protection of human health and the environment while enhancing competitiveness and innovation, remain highly relevant today. A central element of REACH is the commitment to promote alternatives to animal testing. Article 1 highlights the promotion of alternative methods for hazard assessment, while Article 25 clearly establishes that testing on animals must be undertaken only as a last resort.

Nearly two decades after its entry into force, the anticipated revision of REACH was expected to modernise the regulation, simplify processes, and align chemical safety assessment with advances in scientific methodologies such as non-animal approaches.

However, recent developments indicate that the full legislative revision of REACH through the ordinary legislative procedure is likely to be delayed or may not proceed in the near term. The European Commission's Impact Assessment was rejected by the Regulatory Scrutiny Board, and limited political support suggests that a comprehensive proposal may not materialise as previously planned.

While this development is disappointing, it should not stall progress towards modernising EU chemicals regulation. Humane World for Animals continues to see significant value in a REACH revision and urges the Commission to pursue alternative pathways to advance the integration of modern, non-animal approaches into regulatory chemical safety assessments. In particular, the Commission can introduce targeted changes to the technical annexes to REACH through the EU Comitology Procedure, which allows updates to technical provisions without reopening the entire regulation. Revising the annexes offers a practical pathway to modernise information requirements and ensure that the regulatory framework can accommodate scientific innovation.

In this context, Humane World for Animals urges the Commission to ensure that updates to the REACH annexes lead to a future-proof and modern regulatory system, including but not limited to:

- **Create sufficient flexibility for the integration of non-animal methods**. Rather than relying on rigid and prescriptive lists of test methods, regulatory information requirements should focus on meeting clearly defined criteria linked to the protection of human health and the environment.
- **Improve the implementation of Annex XI** of the REACH Regulation, which establishes the legal basis for adapting standard information requirements. This is a crucial moment to ensure that the adaptation provisions contained in Annex XI are not only legally available but also practically implementable for a real substance-tailored assessment.
- **Provide clearer guidance on how the last resort requirement** should be applied and enforced,

as well as by embedding the last-resort requirement more explicitly within the annexes themselves and in processes, such as testing proposals

- **Take into consideration the EC Roadmap towards phasing out of animal testing** in chemical safety assessment and integrate its objectives and milestones. This roadmap represents a landmark initiative that has the potential to transform the regulatory landscape by promoting innovation, strengthening collaboration between regulators and scientists, and providing a clear trajectory for the gradual replacement of animal testing methods.
- **Improve transparency and data sharing** within the REACH system is also critical to reducing unnecessary testing. Initiatives such as One Substance One Assessment (OSOA) and the development of a Common Data Platform for Chemicals Regulation. Ensuring better access to data, improving transparency in regulatory decision-making processes, and strengthening mechanisms for data sharing among registrants would significantly reduce duplication of testing efforts and prevent the generation of unnecessary animal data.

In conclusion, although the delay or possible cancellation of a comprehensive REACH revision is disappointing, the opportunity to modernise Europe's approach to chemical safety assessment should not be lost. Through targeted revisions to the REACH annexes via the Comitology procedure, the European Commission can still introduce meaningful changes that allow the integration of modern non-animal approaches, strengthen the application of the last-resort requirement, and provide registrants with greater flexibility to meet regulatory information requirements in scientifically robust ways. Aligning REACH implementation with emerging scientific approaches and with the forthcoming EU roadmap for phasing out animal testing will ensure that the EU regulatory framework remains forward-looking, science-driven, and capable of protecting both human health and the environment while reducing reliance on animal testing.