

Alternatives Assessment in a Changing Policy and Supply-Chain Landscape

EU chemical policy trends and what they mean for TUR planners

Colleen E. McLoughlin, PhD., DABT, E.R.T.
Director of Toxicology and Interdisciplinary Sciences
Enhesa

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Overview

Key EU Frameworks

Emerging hazard endpoints

Broader Definitions of Concern

Supply Chains as Information Pathways

Defining Hazard and Concern

REACH

SVHCs:

CMR, PBT/vPvB, equivalent concern

Regulatory Mechanisms:

Authorization can require alternatives analysis

Restrictions increasingly apply to groups, not just single substances

Supply-chain communication:

Article 33 requires communication when Candidate List SVHCs exceed 0.1% in articles

Defining Hazard and Concern

CLP

Role:

Formal hazard classification and labelling

What's new:

Endocrine disruption (human health + environment); PBT, vPvB, PMT and vPvM

Timeline:

Applying from May 2025 (substances) and May 2026 (mixtures)

Why it matters:

These hazards now show up in labels, SDSs, and downstream communication

Sustainability reporting

CSRD / ESRS E2

Corporate Sustainability Reporting Directive / European Sustainability Reporting Standards

- **What**
Pollution-related disclosures can include SoCs and SVHCs
- **Why it matters**
Chemical questions may extend beyond SVHCs alone
- **Where this shows up**
Products, value chains, and supplier information requests
- **Important caveat**
The reporting framework is evolving, so details may shift

Safe and Sustainable by Design

EC Framework 2022 · Revised recommendation March 2026
Updated Methodological Guidance expected April 2026

- Voluntary, but highly relevant to early-stage chemical decision-making
- Encourages earlier consideration of hazard, function, and life-cycle trade-offs
- Often prompts questions before a formal regulatory trigger exists
- Practical effect: chemical scrutiny starts earlier

Emerging Endpoints: Endocrine Disruption

Human Health and Environment

- CLP now includes hazard classes for human health and for the environment
- Categories: known/presumed endocrine disruptors and suspected endocrine disruptors
- Formal classification flows into SDSs, labels, and supply-chain conversations
- Key shift: moves from scientific and advocacy contexts to formal hazard communication
- Arrives in practice as new CLP classifications, screening tool flags, and customer/brand questions — often before the full dataset is complete

Emerging Endpoints: Mobility

PMT / vPvM — Persistence & Mobility

- PBT focuses on bioaccumulation; PMT/vPvM focuses on movement through water systems and long-term water resource contamination
- Persistent + mobile substances can be very difficult to remove through conventional treatment
- A substance need not be highly bioaccumulative to raise this concern
- Broader pattern: growing attention to chronic, diffuse, environmentally persistent exposure pathways
- Arrives in practice as evolving classifications, screening tool flags, and items on questionnaires and RSLs

Evolving Definitions of Chemical Concern

REACH (SVHC)

Formal regulatory designation; published list

ESRS E2 / CSRD

SVHCs, SoCs, other

Company or sector criteria

RSLs, MRSLs, internal lists, customer requirements, certifications, or preferred/sustainable chemistry frameworks

Result: scope needs to be explicit and documented

Supply Chains as Information Pathways

Formal pathways

REACH Article 33

SVHC >0.1% by weight in articles → mandatory communication to downstream users and consumers on request

SCIP Database

Since Jan 2021: articles with Candidate List SVHCs >0.1% notified to ECHA — publicly accessible to anyone

Market and customer-driven pathways

- Customer questionnaires and due diligence requests
- Restricted substance lists (RSLs) and manufacturing RSLs
- Full material disclosure requests
- Procurement screens going beyond current legal requirements
- Requests for confirmation against anticipated regulatory changes

What it means in practice:

EU-driven questions can reach suppliers far outside the EU

Implications for Toxics Use Reduction Planning

1 Before a formal regulatory trigger

Questions may arrive through customers before U.S. rules change

2 Broader hazard considerations

Be explicit about what is in scope and what is not

3 Clear, well-documented reasoning

Transparent methods and limits increase credibility

4 Demand is growing

More endpoints and more requests mean more need for quality assessments

Complexity, Uncertainty, and Professional Judgment

Data availability still varies significantly

The frameworks don't fully align

"No suitable alternative" remains a valid and important conclusion

The fact that this work is getting more complex is not a reason to be discouraged.

It is a sign that it is reaching more contexts, defining more decisions, and achieving greater visibility.

Thank You

Questions?

Let's connect on LinkedIn!

