EUROPEAN CHEMICALS AGENCY

Helsinki, 12. 06. 2015

D(2015)2291
GD/lj

Dear sir/madam,

Thank you for writing to urge ECHA to do what we can to ensure that testing on animals is a last resort under the EU's legislation on chemicals.

REACH, the legislation which we implement, aims to ensure a high level of protection for human health and the environment from the potentially hazardous effects of chemicals. This goal can only be achieved if there is scientifically sound information which shows how chemicals affect people and the environment. As documented in two reports on the use of alternatives to testing on animals cited below, companies have so far made extensive use of the various alternatives to animal testing to generate this information. So, in response to your first point about the numbers of animals likely to be used for REACH induced testing, I am pleased to note that the evidence suggests the number will be a great deal lower than originally estimated.

Since starting our work in 2007, we have taken the promotion of alternative test methods and the avoidance of unnecessary animal testing very seriously. We are critically examining proposals from companies to test substances on animals; requiring companies to share data so as to avoid duplicate testing; developing computer modelling of substances which can be used as an alternative to testing; and promoting all the alternatives to animal testing that are - or will become - available. I have provided some useful links below to illustrate this work. ECHA is firmly committed to continuing in this way, because it is not as yet possible to apply alternative methods and approaches in all situations, especially for establishing the long-term effects for human health and the environment. Therefore, REACH registrants and ECHA still need to rely on animal testing when effects cannot be predicted in a scientifically valid and reliable way.

However, you make four specific requests in your letter and I can reassure you that we are already working with the Member States and the Commission on all of them. It should be noted in this context that the European Ombudsman closed her inquiry into the complaint of PETA with the following conclusion: *The Ombudsman is satisfied with the way in which ECHA has accepted her friendly solution proposal and thus settled the case.*

In summary, here is an outline of what we are doing as a follow-up of the Ombudsman's conclusion on PETA's complaint:

- We are identifying appropriate dossiers for compliance check to verify why animal tests were conducted while non-animal methods seemed possible. On the basis of our first experiences of doing this, we will decide whether compliance check proves to be an effective way of checking that animal testing is conducted only as a last resort.

- We are continuing to inform Member States of possible breaches of the registrants' obligations to consider alternatives before conducting tests on animals. We aim to publish our preliminary findings on this matter in the summer but it is the Member States' responsibility to follow up on these possible breaches.

- We continue to inform registrants of their legal obligation to consider the use of alternatives to testing on animals and plan to improve our guidance on this.

I hope that this letter reassures you of the initiatives we are taking in order to ensure that testing on animals is a last resort.

Yours sincerely,

Geert Dancet
Executive Director

For further information:

Animal testing under REACH and ECHA's role:
http://echa.europa.eu/web/guest/chemicals-in-our-life/animal-testing-under-reach
http://echa.europa.eu/documents/10162/13630/reach_factsheet_animal_testing_en.pdf

Testing methods and alternatives:
http://echa.europa.eu/support/testing-methods-and-alternatives

ECHA Practical Guide "How to report in vitro data":
http://echa.europa.eu/documents/10162/13655/pg_report_in_vitro_data_en.pdf
ECHA Practical Guide "How to report read-across and categories":
http://echa.europa.eu/documents/10162/13655/pg_report_readacross_en.pdf
ECHA Practical Guide "How to avoid unnecessary testing on animals":
http://echa.europa.eu/documents/10162/13655/pg_avoid_animal_testing_en.pdf

ECHA's report on implementation and use of non-animal tests (REACH art. 117 (3)):
http://echa.europa.eu/documents/10162/13639/alternatives_test_animals_2014_en.pdf
http://echa.europa.eu/documents/10162/13639/alternatives_test_animals_2011_en.pdf