

The Swedish Implementation Council
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Klimat- och
näringslivsdepartementet,
Enheten för cirkulär ekonomi,
kemikalier och strålning
Kopia KN NIM

Input to Sweden's position ahead of the upcoming EU negotiations – announced proposal for revision of the REACH Regulation

The Implementation Council's contribution to the Swedish position is presented in full in section 8. The Council's proposals in summary are:

- The Government should work to ensure that an ambition of a high level of protection in chemicals legislation is balanced, particularly regarding the effects on companies' competitiveness.
- The Government should work to ensure that the primary basis for assessment of substances continues to be risk-based.
- If there is a transition to a more hazard-based approach, the Council recommends that the Government should work to ensure that the exemption structure is designed in a predictable and manageable manner for companies.
- The Government should work to ensure that the phasing out of substances takes place during realistic transition periods and with intellectual property rights protection that makes substitution and adaptation practically feasible for companies.
- The Council would like to stress the importance of clarifying the relationship between different legislations.
- The Government should work to clarify the classification of hazardous substances.

The Council's proposals in summary, continued:

- The Government should not support proposals to introduce a Mixed Assessment Factor (MAF).
- The Government should establish common measurement and sampling methods.
- The Council would like to stress the importance of creating a clear and user-friendly registration system.
- The Council would like to emphasise the importance of increasing the transparency and involvement of the business community in the work on chemicals legislation.
- The Government should support proposals aimed at improved supervision of dangerous substances, especially imported ones.
- The Government should work to ensure that comprehensive evaluations of REACH are carried out more frequently, particularly regarding the impact on companies and competitiveness.

1. Task of the Implementation Council

The Implementation Council is tasked with assisting the Government in its efforts to strengthen the competitiveness of Swedish companies by avoiding implementation above the minimum level and counteracting unjustified regulatory burdens, as well as reducing administrative costs and other compliance costs in connection with the implementation of EU regulations in Swedish law. The Implementation Council's work must be based on a company perspective.

The Implementation Council is to submit documentation and recommendations to the Government, partly as a contribution to Swedish positions in negotiations and partly on how EU legal acts can be

implemented in Swedish law in a way that is not more far-reaching from a business perspective than what the legal acts require.

The Implementation Council's work is based on problem descriptions that have been communicated to the Council, mainly from industry organisations and their member companies. During the work on the documentation, contacts are also made with others who are familiar with the respective subject area, such as government agencies. In the light of the information gathered and in the context of the overall objective of the act in question, the Council makes a weighted and independent assessment of how the business perspective can be effectively addressed in each case.

In preparing this opinion, the Council has mainly made use of documentation received in contacts with the Innovation and Chemical Industries in Sweden (IKEM), the Chemical Technical Association (KTF), the Research Pharmaceutical Companies (LIF), the Technology Companies and the Recycling Industries.

2. Relevant proposal for an EU legal act

Upcoming proposal for revision of Regulation (EC) 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (the so-called REACH Regulation, abbreviation for Registration, Evaluation, Authorisation and Restriction of Chemicals.)

3. Objectives and purpose of the proposal

The European Commission's communication Chemicals Strategy for Sustainability – Towards a Toxic-Free Environment¹ has, among other things, the ambition to simplify and strengthen the regulatory framework for chemicals. One part of this is a proposal for a revision of the REACH Regulation.

4. Where in the process is the proposal?

The proposal for a revision of the REACH Regulation is expected to come by the end of 2025. On 3 April 2025, a meeting of the CARACAL (Competent

¹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Chemicals Strategy for Sustainability Towards a toxic-free environment

Authorities on REACH and CLP Implementation) expert group was held, where the Commission presented its perspective on the upcoming revision.

Despite the relatively limited data available at this early stage, the Implementation Council considers it important to submit an opinion, primarily in view of the changed view of risk assessment that emerges in the chemicals strategy. The opinion can form the basis for bilateral contacts with the Commission, submissions in the ongoing consultation process or other advocacy work at an early stage.

5. Responsible ministry

Ministry of Climate and Enterprise

6. Problem description from a Swedish business perspective

There is a broad consensus from companies that a high level of protection for health and the environment should apply in the chemicals area. At the same time, the business community feels that Sweden often pushes for strict chemicals legislation in the EU and has over-implemented by having special legislation alongside it, despite the risk of negative effects on Swedish companies and their competitiveness.² Based on the discussions that the Implementation Council has had with stakeholders, the Council perceives that the high level of ambition presented in the chemicals strategy is largely supported by the business community. However, with regard to how to achieve the high level of protection, there are some concerns about problems that may arise if sufficient consideration is not given to the actual circumstances of companies.

Problematic to move from risk-based to hazard-based view of chemicals

The overall ambition of the chemicals strategy is to achieve a non-toxic environment. The revision of REACH may entail a change in the approach to how chemicals should be assessed, meaning that substances should be assessed based on the intrinsic hazard they possess, regardless of how, to what and to what extent they are used. This would mean moving away from

² [Avskaffa-nationell-sarlagstiftning-for-Sarskilt-farliga-produkter-och-avloppsrensningemedel.pdf](#)

the current system, which is primarily based on assessment and management of risk, to a greater extent than before, based on inherent danger and thus prohibition with the possibility of exemptions. This change of approach would create problems for companies in several ways, mainly because it is considered uncertain and unpredictable how exemptions are granted and under what conditions.

A hazard-based approach means that substances that would be safe to manage are excluded from the value chain, with the result that the advantages and benefits that a safely managed substance could bring, for example in terms of sustainability and circularity, are missed. Recycled material that contains chemicals and is intended to be used in a closed product without the risk of leaking into humans and the environment risks not being able to be used if the legislation is based on a hazard-based perspective.

The hazard-based view would mean that certain chemicals that can currently be used to a certain extent and under certain conditions would be banned if they are not granted exemptions. Prohibitions are a strong policy instrument that can hit the business community hard, and planning your activities based on whether you can get an exemption or not is very unpredictable. Some substances can be replaced with others, but if that possibility does not exist, or if the company does not have the opportunity and resources to carry out the process required to find a replacement, the business must cease. This not only affects the company in question but can also cause problems for other companies. Companies covered by REACH often operate in value chains, which means that several parts of the business community may be affected if the compensation process is not successful for the individual company. Therefore, it is important to look at the entire value chain when assessing the impact on the business community.

To look only at intrinsic hazard is a blunt instrument with which it is difficult to achieve the right balance between protection and competitiveness. The intrinsic hazard of a substance, which in itself could justify a ban, is in some cases precisely what makes the substance effective. Any restrictions or prohibitions need instead to be targeted more precisely at the situations where a hazardous substance can actually cause harm.

It is also important that resources are devoted to supervision of dangerous substances imported from third countries. Compliance with the rules on these chemicals is lacking and, without supervision, competitive

disadvantages are created for companies in the EU, while health and the environment suffer.

Exemption structure risks creating new difficulties

Businesses benefit from clear and predictable rules. Simplification in a complex area such as chemicals legislation is a challenge in itself. From a business perspective, a hazard-based view of chemicals does not necessarily mean simplification either. Instead, it risks creating a new and unpredictable reality for companies, which then have to deal with exemptions that can be difficult to overview, especially if there are no clear guidelines for how they should be granted. If the legislation is not sufficiently clear and difficult to interpret, there is also a risk of fragmentation and thus an uneven playing field that leads to distorted competition. Even if such a new system is incorporated over time, there is a great risk that there will still be an increased workload and costs for companies that need to be taken into account during the transition period. It is also problematic if different parts of the value chain are differently burdened before the new system has had full impact. For example, recycling activities at the end of the value chain may need to relate to prohibited substances in materials that the chemical industry was allowed to handle earlier in the value chain based on previous systems of risk assessment. If, on the other hand, the system is kept as it is today, the companies can continue their operations according to established procedures and take advantage of compliance work that has already been done.

What the exemption structure will look like and how quickly it can be put in place is of crucial importance for companies. An exemption structure that can be assumed to be used is the one that is based on the concept of essential use, and which is based on the chemicals strategy (inspired by the so-called Montreal Protocol³). The application of this concept has been discussed, inter alia, in a communication with guidance from the Commission⁴. In order to be eligible for an exemption for non-hazardous use, a chemical must meet two criteria. First, the chemical in question must be necessary for health, safety or socially critical activities. Secondly, there must be a lack of acceptable alternatives. The concept is meant to simplify the phasing out of hazardous substances. However, concerns are expressed from the business

³ Montreal Protocol on Substances that Deplete the Ozone Layer

⁴ Guiding criteria and principles for the concept of indispensable use in EU legislation on chemicals (C/2024/2894)

side, as this concept is perceived as unclear and unpredictable, making its application more time-consuming than the current system of restriction and authorisation. The workload on companies is also increasing, as it can be very difficult to prove that a substance is necessary for health, safety or socially critical activities and that substitutes are lacking.

How one chooses to limit the possibilities for exceptions is of course also of great importance. For example, drawing the line at something that is critical to society gives less space than if you instead also look at what is *socially beneficial*, such as sustainable products or things that benefit competitiveness in other ways (without doing harm). At the same time, there are major challenges in making such assessments. While risk assessments, which in themselves can be both difficult and time-consuming, are based on scientific studies, assessments based on the concept of "essential use" risk becoming arbitrary and unpredictable. Something that, for example, may be considered socially critical in one context, may not be at all so in another. The business community also sees difficulties in ensuring that the entire value chain is taken into account when defining a socially critical or socially beneficial function.

Substitution challenges

When substances are regulated and exemptions are not applicable, companies are forced to try to find a substance that can replace the regulated one. Regulations can thus act as a "push" to get companies to phase out hazardous substances. Substituting a specific substance in a product or value chain can take a very long time in some cases, especially if the value chains are long, complex and global. Substitution is further complicated if the properties sought are unique. The time and resources of substitution are particularly noticeable for smaller companies. Nor is it certain that you will find a replacement that fully fulfils the corresponding function as the substance you have had to replace. An example that has emerged in conversations with stakeholders is a small Swedish company that supplies a certain type of varnish to the defence industry and which, in the event of a ban, would have great difficulty substituting its product as it requires a specific substance to fulfil exactly the function required to be used in the defence. If the composition of the paint has to be changed so that it does not maintain the same performance, the company no longer has a satisfactory product to offer, and the business must then cease. It is important to note that the success of a substitution is determined on a case-by-case basis. It

cannot therefore be assumed that all substitution is successful and, above all, that it will in turn lead to improved competitiveness.⁵

There is also a risk that a substance with known hazards will be replaced by a substance that we currently have less knowledge about and that has potentially negative consequences, so-called "regrettable substitution".

In many cases, special requirements are placed on the end product. Substitution that leads to a change in the product's properties means that requirements in existing standards, CE marking requirements or legislation are not met. Recertifying products or re-registering medicines or complex technical products can take a very long time, in many cases 15-20 years, sometimes more. If it concerns products in global value chains, the matter is further complicated as legislation and standards that apply in other regions of the world must be taken into account.

The possibility of taking advantage of the development work of others to accelerate substitution is often hindered by the fact that companies operate under different conditions and cooperation is sometimes limited by competition law. It is also not possible for companies to share trade secrets. The lack of intellectual property protection for new solutions can constitute a competitive disadvantage in the substitution process and thus an obstacle for companies.

Replacing banned substances with others poses challenges and requires the entire value chain to work together. If someone in the value chain opposes substitution due to cost, functional or regulatory reasons, the whole process comes to a halt. At the same time, companies that have come further with phasing out and substitution should not be disadvantaged, especially in cases where larger and more influential companies are pulling in the opposite direction.

Unclear delimitation with other legislation

For some businesses, there is often uncertainty about which legislation applies. An example of this is when it comes to pharmaceuticals, because the components of a medicine are covered by chemicals legislation, while the

⁵ This view of the link between substitution and improved competitiveness is in line with the fact that there is no environmental economic evidence supporting that regulation results in improved competitiveness, the so-called strong variant of the Porter hypothesis; see, for example, Ambec et al. (2013), <https://doi.org/10.1093/reep/reso16>, and Rubashkina et al. (2015), <https://doi.org/10.1016/j.enpol.2015.02.014>.

components composed in a finished product are instead covered by pharmaceutical legislation. Restrictions, authorisations and registration requirements under REACH are not sufficiently coordinated with the requirements of pharmaceutical legislation, which can hamper pharmaceutical manufacturing and development in Sweden and Europe.

Furthermore, there is a lack of coordination between chemicals legislation and waste legislation. Unclear criteria and requirements for recycled raw materials inhibit a circular cycle.

Another problem that can be caused by poor coordination between different legislations is double regulation and double reporting, for example with regard to different sectoral rules.

Different lists and designations of hazardous substances create uncertainty

A basic prerequisite for a stricter view of hazardous substances to be handled by companies is clarity as regards which substances are being referred to. The concept of "Substances of Very High Concern" is well defined in the REACH legislation, as is how substances are included on the Candidate List, which creates legal certainty and predictability. At the same time, however, there are lists and names of substances that lack clear legislative support. "Most Harmful Chemicals", "Substances of Concern" and the Swedish Chemicals Agency's PRIO list are examples of this. This ambiguity creates uncertainty and the risk of non-compliance.

Enhanced Combination Effects Management

Prior to the revision of REACH, a possible change in the risk assessment of substances has been discussed to take into account so-called mixture effects ("cocktail effects"). In order to account for the possible additional hazard that a mixture of substances may pose compared to substances individually, it may be proposed to introduce an additional safety factor – the Mixture Assessment factor (MAF). Many risk assessments would then have to be redone and would entail a large administrative burden for companies in a value chain. The scientific support for the existence of a general combination effect is currently weak and current assessments also already include large

safety margins, which makes it questionable to question the health and environmental benefits of adding such a safety factor⁶.

Lack of common measurement and sampling methods

To ensure compliance with limit values for chemicals in goods or the environment, validated measurement and sampling methods are required. These are often lacking, which leads to a distorted competition where different measurement methods give different results and thus different opportunities for the use and handling of chemical substances.

Cumbersome registration processes

Discussions with the Council's stakeholders have shown that the REACH Regulation is generally perceived to work well, but that the registration processes would need to be reviewed in order not to create unnecessary administrative burden. For example, the software used to make the registration is perceived as complicated. Companies that only want to make small updates to their registration dossier may need to change the entire registration. The inconvenience can make companies reluctant to update the information and new knowledge about secure management then becomes unavailable.

Transparency and participation of the business community not sufficient

In such a complex area as chemicals legislation, it is of great importance to make use of expertise focused on chemicals as well as on the environment that needs to be protected. This expertise is largely found in authorities at both national and EU level. However, it is equally important that there is a sensitivity to the expertise of the business community and its description of the actual conditions that prevail in various relevant activities. At present, several of the stakeholders that the Implementation Council has spoken to experience an imbalance in terms of what for the Swedish part governs the development in the chemicals area and that the companies' reality is not given sufficient importance in the trade-offs that are made. This applies not least to small and medium-sized enterprises. A lack of transparency and participation from business actors risks leading to a less functioning market

⁶ For example, see https://cefic.org//app/uploads/2025/04/Action-6_Avoid-integrating-MAF-in-REACH.pdf

that will not be as sustainable and competitive as if they are involved and allowed to present their perspective.

It can be expected that the European Commission will work to ensure that a large part of the regulation of the chemicals area will take place through delegated acts. This comes naturally to an area as complex and extensive as the chemicals sector. If the work on the delegated acts is not carried out with sufficient involvement of experts from the Member States or without proper transparency for industry, the regulations may become problematic in terms of effectiveness and from a compliance point of view.

7. Implementation Council Analysis

The transition from a risk-based to hazard-based approach that the revision of REACH is expected to bring would represent a fundamental change in the system for regulating the use of chemicals. The current system is mainly based on restrictions and permit requirements based on the risk posed by different chemicals in different types of handling, while the new system would instead be based on bans for chemicals based on their intrinsic properties. The possibility of handling such substances would only exist to the extent that exceptions are given in the specific case. Such a change of approach would have significant consequences for the entire part of the business community concerned, which would have to both get used to the approach as such and, above all, adapt its activities in relation to the new approach. From a government perspective, there are advantages to get companies to make a greater effort in connection with the transition, as it is easier and cheaper for the authorities. However, the cost and uncertainty this entails for companies will be negative for competitiveness.

The chemicals strategy is based on the European Green Deal, which is still in force, but a clear political objective is also to improve the EU's competitiveness. It is important to reconcile these objectives in the best possible way, and this cannot be done without taking into account the conditions of the business community.

It should be mentioned that there is a notable lack of impact assessments and evaluations in relation to REACH. Therefore, it is very difficult at present to specify the costs and other impacts of this regulation to the business community. The extent of the effect on SMEs is also unclear, other than that they are relatively more severely affected. However, it is reasonable

at this early stage to assume that REACH has and will continue to have a major impact on the business community concerned.⁷

Industries and companies concerned

REACH covers most of the Swedish business community. Areas such as industrial products, electronics, automotive, paints, cleaning products, clothing, furniture, household appliances and recycling are covered.

To give an indication of the large number of Swedish companies affected by the proposal, it can be mentioned that for SNI (Swedish Standard Industrial Classification) letter level C "Manufacturing industry", which involves, among other things, the food, textile and furniture industries, there are, according to 2024 data, in Statistics Sweden's business database, 54,493 companies, of which 89% have 0–9 employees.

Consequences for Swedish companies

Increased administrative burdens

Given the purpose of REACH, it is inevitable that the regulatory framework entails a great deal of administration for all parties involved. However, it is important to keep the administrative requirements on companies down, for example regarding registration and permit processes. If the current system of risk management is to be transformed into a hazard-based system, there is a risk that new administrative burdens will arise.

Increased costs for companies

As mentioned above, the hazard-based approach based on prohibitions, possible exemptions and substitution is more burdensome and costly for companies than the current risk-based system. In practice, it becomes difficult for the company to justify and know in advance whether the company's use of a chemical qualifies for an exemption or not. The uncertainty surrounding this also affects the willingness to invest.

⁷ An indicator of the extent of the costs at EU level in connection with similar legislation can be obtained from the cost estimation by the consultancy firm Ricardo in 2021 on behalf of the European Chemical Industry Council (Cefic). They focused on what the extended hazard classes in the CLP Regulation would cost in combination with the expansion of a hazard-based view of the chemical regulation. The analysis showed that up to 12,000 substances could be affected and that these together accounted for 28% of the turnover of the chemical industry at EU level. For more information see <https://cefic.org/news/upcoming-eu-chemical-legislation-puts-europes-fourth-largest-manufacturing-industry-at-crucial-crossroads/>.

When substances are banned and exemptions are not applicable, companies are forced to either cease their activities or try to find a substance that can replace the prohibited one. To cease one's business affects one's own company, but can also have the consequence that other business is affected, for example those that are dependent on a product containing the prohibited substance, not least if one is part of a value chain.

It must be seen as very difficult to calculate what such a loss costs and what the cost will be of possible substitution, especially in terms of research and development costs. There are also hidden costs, such as the cost to the user of the product who may have to settle for poorer performance, such as a shorter lifespan, more maintenance or poorer safety. Furthermore, there is a cost in the fact that some companies are unable to live up to the new rules if they become too strict.

Impact on competitiveness

If the high ambitions of protection in the environmental area lead to very strict chemicals legislation without sufficient consideration of the conditions of the business community, it will have a negative effect on the competitiveness of both Swedish and European companies. Adding national special legislation to the common chemicals legislation can also have a negative impact on competitiveness.

8. The Implementation Council's basis for Sweden's position for upcoming EU negotiations

With the chemicals strategy, the level of ambition was raised in terms of protection of health and the environment. At a later date, and in light of the changed international situation, the level of ambition in terms of competitiveness has also been raised. The Implementation Council sees a need for, a value in and opportunities to combine the high ambition of protection in the Chemicals Strategy with the focus on competitiveness by making changes to the chemicals legislation on the basis of a good understanding of the conditions for the business community. In our discussions with stakeholders, it has emerged that the REACH Regulation and the current system of risk assessment are perceived to work well. This system now seems to be facing a change in which the intrinsic hazard of substances should be the starting point rather than the risks they may pose depending on their use. In its work with this documentation, the Implementation Council has understood that companies also have high

ambitions when it comes to protection of health and the environment, but that the path to get there may need to look different from the one that seems to be about to be proposed. Below is a number of suggestions and recommendations based on this perspective.

➤ **Work to ensure that an ambition of a high level of protection in chemicals legislation is balanced with particular regard to the effects on companies' competitiveness**

The ambition to work for a high level of protection in the chemicals area is shared by the business community. If the legislation becomes disproportionately strict, it risks harming the competitiveness of companies. The Government should therefore pay attention to the conditions and needs of companies and, on the basis of these, work for a balance between a high level of protection and good competitiveness. Swedish special legislation should not automatically constitute Sweden's position in the coming negotiations, given the Government's ambitions in the area of regulatory simplification.

➤ **Promote a continued risk-based assessment of substances**

Moving away from risk-based assessment in favour of a hazard-based assessment would mean a blunter regime in which opportunities to produce important and useful products at a reasonable cost and to safeguard sustainability and circularity cannot be fully exploited. Such a change would entail high costs, hampered innovation capacity and the risk of a loss of competitiveness in relation to third countries. Chemicals legislation should therefore continue to be based on a proportionate assessment of the risks posed by chemicals, rather than only looking at their intrinsic properties.

➤ **If there is a shift to a more hazard-based approach, the exemption structure must be designed in a predictable and manageable way for companies**

If, despite everything, a more hazard-based approach was to be adopted, the Government should work to ensure that the exemption structure is designed with great care and in a predictable and manageable manner for companies. Too narrow exemptions risk hampering companies' future innovation and

competitiveness. One should look beyond what can be allowed because it is socially critical - even substances that can be considered socially beneficial need to be able to be used to create the greatest possible competitiveness, not least through circularity and resource efficiency. It is necessary to take into account the additional workload that new standards of proof would entail for companies and, in order to make it easier, it should be made very clear and predictable when exemptions can be granted. In order to avoid a system based on a case-by-case assessment, there needs to be the possibility of block exemptions. It should also be possible to extend time-limited exemptions if necessary. A transition to a new regime also requires adapting the new exemption structure to the entire value chain so that different conditions do not apply to different actors at different levels depending on the stage at which they have been given the opportunity to deal with a substance.

➤ **Phasing out substances must take place at a feasible pace and with intellectual property protection in the case of substitution**

Phasing out substances should take place during realistic transition periods that make substitution and adaptation practicable for companies. A thorough review of how long it actually takes to carry out development work, registration, certification and other measures before the substance can be considered fully substituted is required before deciding when a substance is no longer allowed. In this context, the Council would like to highlight in particular the long development times required to change and modify and subsequently re-register medicines. It is also important to promote intellectual property protection in the substitution process so that it does not entail competitive disadvantages for companies that develop new solutions.

➤ **The relationship between different pieces of legislation needs to be clarified**

In connection with the revision of REACH, it is important to review related legislation and to clarify any ambiguities about when other legislation takes precedence.

➤ **Clarifying the classification of hazardous substances**

A clear system for classifying hazardous substances is required to be able to navigate in the field of chemicals. Parallel lists and classifications should be avoided in favour of a uniform and user-friendly list supported by legislation.

➤ **Safety factor for mixtures with questionable added value should not be introduced**

There is insufficient evidence on the actual added value of introducing a new safety factor for the assessment of mixtures (MAF). In view of this and the additional burden it would entail for the companies in the value chains concerned to carry out such assessments, the Government should not support any such proposal.

➤ **Establish common measurement and sampling methods**

In connection with the development of restrictions and other regulations in the area of chemicals, discussions must also take place about how the regulations can be followed up by both companies and authorities through supervision, control and measurement methods. Stricter rules for chemicals place higher demands on common measurement and sampling methods to avoid distorted competition.

➤ **Create a clear and user-friendly registration system**

The existing registration processes are often cumbersome and unnecessarily burdensome. When revising REACH, it is important to review these and to create as far as possible an efficient and user-friendly system that reduces the administrative burdens experienced by companies.

➤ **Increase the transparency and involvement of the business community in the work on chemicals legislation**

The Implementation Council finds that business actors want more participation in the work on chemicals legislation. Both at the overall level and in more detailed work, such as delegated acts, the business perspective needs to come in to balance other perspectives by illuminating the actual conditions in the activities affected by the chemicals legislation.

➤ **Comprehensive evaluation of REACH should be carried out more frequently, paying particular attention to the impact on businesses and competitiveness**

Given REACH's major impact on the chemicals industry, it is noteworthy that the most recent comprehensive evaluation available is from 2018. A recent evaluation of REACH would have been a valuable support in its revision. To ensure an evidence-based development of REACH, it is important that comprehensive evaluations of it are carried out more frequently, for example every five years. It is important that these evaluations pay particular attention to the costs incurred by companies, not least those linked to the substitution process, and the impact they have on competitiveness. The extent to which SMEs are affected and how they are affected must be examined in detail.

➤ **Work for improved supervision of dangerous substances**

It is important that resources are spent on supervision and that the regulations that are developed in the EU are possible to exercise supervision on. It is particularly important to focus on the large proportion of articles and products that do not comply with EU chemicals legislation and that are found on the market through imports from third countries. The Government should support proposals for improved supervision, especially of these products.

Contact persons in this case are Committee Secretaries Lena Nordqvist and Fredrik Hansen (förnamn.efternamn@regeringskansliet.se).

Decided by the Swedish Implementation Council on 24 September 2025.

This document has been machine translated from Swedish to English.