

ANNEX II - Overview of assessment tables of the CSS Report

To provide an overview of the assessment on the implementation of each topic, the report includes several informative tables summarising the actions related to each topic per chapter and providing assessments on the implementation and ambition achieved. These tables offer two evaluations: one regarding the extent to which actions have been implemented, and the other regarding the ambition to deliver those actions and achieve the intended objectives of the CSS.

On the column related to the level of implementation, we evaluate the extent to which CSS objectives have been achieved, with reference to deliverables set by the Commission in the implementation table on its website¹. Evaluation criteria include:

- Low (Red): the action has not been launched;
- Moderate (Orange): minor progress has been achieved, but much remains to be done;
- Considerable (Yellow): significant progress has been made, but not to the extent expressed in the CSS;
- High (Green): action has been fully implemented.

The qualitative evaluation of ambition, on the last column, assesses whether actions taken and initiatives implemented (or not) have served to achieve the overarching objectives of the CSS and the EGD. Criteria include:

- Low (Red): measures are unsuitable to fulfil the intended actions and CSS objectives;
- Moderate (Orange): some progress has been made to partially reach the goals set by the CSS, but significant progress is still required;
- Considerable (Yellow): measures are delivered and fit for purpose, but do not completely reach the CSS goals;
- High (Green): actions put in place have been effective and satisfactory, contributing to achieving the CSS goals.

¹ European Commission, STATE OF THE IMPLEMENTATION OF THE ACTIONS ANNOUNCED UNDER THE CHEMICALS STRATEGY, European Commission. Available at: https://environment.ec.europa.eu/system/files/2021-11/Table_implementation_CSS_actions.pdf



From Risk to Resilience:
Navigating Towards a
Toxic-Free Future

Policy area EEB European Environmental Bureau	Main actions and deliverables	Level of implementation	Level of effort
CLP	<p>Revision of regulation: Proposal published by EC in December 2022. Expected to be adopted soon by the Council and Parliament.</p> <p>New hazard classes: Delegated Act published by EC in December 2022, adopted by EP and Council after scrutiny in 2023.</p>	<p>GREEN</p> <p>Legal proposal published, awaiting final approval by EP and Council</p> <p>New hazard classes implemented in CLP regulation</p>	<p>GREEN</p> <p>The proposal for revision of the CLP regulation met the CSS ambition.</p> <p>New hazard classes for EDs, PBT/vPvBs, and PMT/vPvMs are included in the CLP Regulation in line with CSS ambition.</p>
	#27 Proposal to amend the CLP Regulation to introduce new hazard classes on endocrine disruptors, PBTs/vPvBs and persistent and mobile substances, and apply them across all legislation	GREEN Proposal published in 2022 and implemented since 2023	GREEN
	#51 Proposal to amend CLP Regulation to give the Commission the mandate to initiate harmonised classification	GREEN: Proposal published in 2022, currently awaiting formal approval by the co-legislators	GREEN
	#81 Proposal at the UN GHS level to introduce, adapt or clarify criteria/hazard classes in line with the CLP Regulation Proposal to amend REACH Article 68(2) to include professional users	GREEN Proposal published in 2022 and introduction proposed to UN GHS subcommittee in 2022.	ORANGE CLP legal proposal was published and meets CSS ambition; ORANGE, because much remains to be done regarding implementation in GHS and final level of ambition unclear
REACH	Several studies and consultations were launched, and many different expert working groups were organised to advance	RED Despite progress achieved, the Commission decided to stall	RED The draft options for the revision presented at CARACAL, e.g. on

	<p>proposals to reform REACH. An impact assessment was performed, and it received a positive opinion by the Regulatory Scrutiny Board.</p>	<p>the revision of REACH, no proposal has been published.</p>	<p>polymers registration, GARM, information requirements, authorisation and restriction didn't reflect the ambition of the Strategy.</p>
	<p>#9 Ensure that authorisations and derogations from restrictions for recycled materials under REACH are exceptional and justified</p>		
	<p>#20 Roadmap to prioritise carcinogenic, mutagenic and reprotoxic substances (CMRs), endocrine disruptors, persistent, bioaccumulative and toxic (PBT and very persistent and very bioaccumulative (vPvB) substances, immunotoxicants, neurotoxicants, substances toxic to specific organs and respiratory sensitisers for (group) restrictions under REACH</p>		
	<p>#21 Proposals to extend the generic approach to risk management to ensure that consumer products do not contain chemicals that cause cancers, gene mutations, affect the reproductive or the endocrine system, or are persistent and bioaccumulative and toxic; assess the modalities and timing to extend the same approach to further chemicals</p>		

	including those affecting the immune, neurological or respiratory systems and chemicals toxic to a specific organ		
	#22 Proposal to amend REACH Article 68(2) to include professional users		
	#23 Introduce mandatory legal requirements under the General Product Safety Directive and restrictions in REACH to enhance the safety of children from hazardous chemicals in childcare articles and other products for children (other than toys)		
	#28 Update information requirements to allow the identification of endocrine disruptors in relevant legislation particularly under REACH, legislation on cosmetic products, food contact materials, plant protection products and biocidal products		
	#30 Assess how best and introduce (a) mixture assessment factor(s) in Annex I of REACH		
	#33 Proposal to amend REACH Article 57 to add endocrine disruptors, persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) substances to the list of substances of very high concern		

	#38 Proposal to restrict PFAS under REACH for all non-essential uses including in consumer products		
	#49 Proposal to revise the REACH authorisation and restriction processes		
	#63 Amend REACH to ensure compliance checks on all registrations of substances under REACH and to allow for the revocation of registration numbers		
	#72 Proposals to revise requirements for registration in REACH to ensure: the identification of substances with critical hazard properties, including effects on the nervous and immune systems, the move towards grouping approaches, the registration of a sub-set of polymers, information on the overall environmental footprint of chemicals, the obligation of chemical safety reports for substances between 1-10 tonnes		
SSbD	The EC has developed in December 2022 a framework defining the concept of 'safe and sustainable by design' and a set of criteria. However, the other key deliverable, the establishment of an EU-wide SSbD support network remains undelivered.	YELLOW One of the two main actions, the SSbD framework has had significant progress.	ORANGE The SSbD framework met the ambition of the CSS. Although the EC's recommendation for a testing period and a voluntary reporting

			mechanism has been very low in ambition. A revision of the framework has not been launched. The EU-wide SSbD support network was not developed.
	#2 Develop EU safe and sustainable-by-design criteria for chemicals		
	#3 Establish an EU-wide safe and sustainable-by-design support network		
	#4 Financial support for the development, commercialisation, deployment and uptake of safe and sustainable-by-design substances, materials and products		
	#5 Mapping safe and sustainable-by-design skills mismatches and competence gaps, and make recommendations		
Essential use concept	Supporting study was published in April 2023, but the promised actions were not delivered, no Communication with a proposal has been presented and might be finally a guidance.	RED Not implemented	ORANGE The study was aligned with the ambition of the CSS, however it has not resulted in any policy outcome.
	#26 Define criteria for essential uses, taking into account the		

	definition of the Montreal Protocol		
GARM	Proposals to broaden the GARM to prevent consumer products from containing CMRs, EDs, and PBTs. Additionally, CSS committed to evaluate extending this approach to include chemicals affecting immune, neurological, or respiratory systems, as well as those toxic to specific organs. These actions are set to be implemented through legal proposals under REACH, the FCMs Regulation, the Cosmetics Regulation, and the Toy Safety Directive	ORANGE Main legislative proposal (REACH revision) not launched. Cosmetics Regulation has not been launched either. The other two initiatives (Toys and FCMs) launched but late and narrow scope	ORANGE Main legislative proposal (REACH revision) not launched. Cosmetics not launched either. The other two initiatives (Toys and FCMs) launched but late and narrow scope
	#21 Proposals to extend the generic approach to risk management to ensure that consumer products do not contain chemicals that cause cancers, gene mutations, affect the reproductive or the endocrine system, or are persistent and bioaccumulative and toxic; assess the modalities and timing to extend the same approach to further chemicals including those affecting the immune, neurological or respiratory systems and chemicals toxic to a specific organ		
Mixtures	Study presented and many discussions on MAF in different settings. MAF included in REACH Impact assessment	ORANGE The EC failed to present legislative proposals addressing	ORANGE While combination effects have been addressed to some extent in the

	A proposal for revised EU Water Quality Standards was presented in October 2022.	mixture assessment for the Regulations on REACH, Food Contact Materials and Cosmetics. The combination effects of chemicals were addressed to some extent in proposals for revised EU water quality standards and in the Toys safety regulation.	revision of the EU Water Quality Standards and Toys Safety Regulation, much more work needs to be done to truly account for the combination effects of daily exposure to multiple chemicals of various sources.
	#30 Assess how best and introduce (a) mixture assessment factor(s) in Annex I of REACH		
	#32 Improve the assessments of the mixtures used in the manufacture of tobacco and related products by using where possible existing EU agencies		
OSOA	The EC legislative proposals for OSOA were published in December 2023.	YELLOW Legal proposals published. The proposals address CSS actions on OSOA, except the ECHA Basic regulation.	YELLOW While ambition of CSS is reflected in many proposals, ambition is not met, for example regarding early warning and action system.
	#46 Establishment of a 'One substance, one assessment' process to coordinate the hazard/risk assessment on		

	chemicals across chemical legislation, through the use of a single Public Authorities Coordination Tool, an expert group and a Commission coordination mechanism		
	#76 Establish an EU Chemical Early Warning and Action System		
	#77 Development of an indicator framework on chemicals		
PFAS action plan	Several actions are proposed to address the presence and impact of PFAS across various legislative frameworks. These include proposals to restrict PFAS under REACH, review annexes of environmental quality and groundwater directives, introduce legal requirements on PFAS presence in products, revise industrial emissions legislation, address PFAS emissions in waste legislation including sewage sludge revision, and advocate for PFAS concerns within international conventions like the Stockholm and Basel Conventions.	ORANGE Only the REACH restriction proposal and the proposal for revising Environmental Quality Standards Directive and of the Groundwater Directive were launched. The other proposals were not announced or only partially.	ORANGE Although the REACH restriction proposal met the level of ambition of the CSS, the proposal for revising the Environmental Quality Standards Directive and the Groundwater Directive launched were not sufficient to address the impact of the wide PFAS group. The other proposals were not announced or only partially.
	#8 Introduce legal requirements on the presence of substances of concern in products, including PFAS, through the initiative on sustainable products		

	<p>#37 Reinforce the regulation of chemical contaminants in food to ensure a high level of human health protection</p>		
	<p>#38 Proposal to restrict PFAS under REACH for all non-essential uses including in consumer products</p>		
	<p>#39 Review of the annexes of the Environmental Quality Standards Directive and of the Groundwater Directive to add PFAS where possible as a group</p>		
	<p>#40 Address the presence of PFAS in food by introducing limits in the legislation on food contaminants</p>		
	<p>#41 Proposal to revise the legislation on industrial emissions and the European Pollutant Release and Transfer Register to address emissions and reporting of PFAS from industrial plants</p>		
	<p>#42 Proposal to address the emissions of PFAS from the waste stage including through the revision of the legislation on sewage sludge</p>		
	<p>#43 Proposals under the Stockholm Convention and the Basel Convention to address PFAS concerns at a global scale</p>		

	# 44 EU-wide approach and financial support for innovative solutions to remediate contamination with PFAS		
	#45 Provide research and innovation funding for safe innovations to substitute PFAS under Horizon Europe		
Endocrine disruptors (EDs)	The CLP has been amended to introduce endocrine disruptors as a new hazard class. The Restrictions Roadmap, published in April 2022, included restrictions of several groups of EDs.	YELLOW Important action, such as the inclusion of EDs under CLP and the publication of the Restriction Roadmap have been achieved. However, key CSS actions to be able to identify and finally regulate EDC have not been implemented.	ORANGE Although some of the actions have partially contributed to achieving the goals set by the CSS, there is still significant progress to be made regarding the information requirements and regulatory control of EDs.
	#20 Roadmap to prioritise carcinogenic, mutagenic and reprotoxic substances (CMRs), endocrine disruptors, persistent, bioaccumulative and toxic (PBT and very persistent and very bioaccumulative (vPvB) substances, immunotoxicants, neurotoxicants, substances toxic to specific organs and respiratory sensitisers for		

	(group) restrictions under REACH		
	<p>#21 Proposals to extend the generic approach to risk management to ensure that consumer products do not contain chemicals that cause cancers, gene mutations, affect the reproductive or the endocrine system, or are persistent and bioaccumulative and toxic; assess the modalities and timing to extend the same approach to further chemicals including those affecting the immune, neurological or respiratory systems and chemicals toxic to a specific organ</p>		
	<p>#27 Proposal to amend the CLP Regulation to introduce new hazard classes on endocrine disruptors, PBTs/vPvBs and persistent and mobile substances, and apply them across all legislation</p>		
	<p>#28 Update information requirements to allow the identification of endocrine disruptors in relevant legislation, particularly under REACH, legislation</p>		

	on cosmetic products, food contact materials, plant protection products and biocidal products		
	#29 Accelerate the development and uptake of methods to generate information on endocrine disruptors through screening and testing of substances		
	#33 Proposal to amend REACH Article 57 to add endocrine disruptors, persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) substances to the list of substances of very high concern		
Export ban	EC committed to present a legislative proposal to stop exports of banned chemicals.	RED A study was commissioned, and a public consultation was launched but a legislative proposal has not been presented	RED As no proposal has been presented, EC didn't meet the CSS ambition.
	#84 Ensure that hazardous chemicals banned in the European Union are not produced for export including by amending relevant legislation if and as needed.	RED A study was commissioned, and a public consultation was launched but a legislative	RED As no proposal has been presented, EC didn't meet the CSS ambition.

		proposal has not been presented	
IED and EPRTR	The IED and E-PRTR revisions, as per the latest political agreement of March 2024, have included the foreseen provisions.	YELLOW The texts have been revised and are expected to be adopted imminently. However, while some provisions partially address emissions and reporting of PFAS, not including the full list of PFAS is a missed opportunity.	ORANGE Although some of the actions might have contributed partially to reaching the goals set by the CSS, there is still considerable progress to be made. Their effectiveness for chemicals control remains uncertain.
	#7 Make amendments to the EU legislation on industrial emissions to promote the use of safer chemicals by EU industry.	GREEN The IED and the E-PRTR revised are close to be adopted in trilogues.	ORANGE The IED includes new provisions to promote safer chemicals but its effectiveness is unclear and will largely depend on the BREF process and its implementation
	#41 Proposal to revise the legislation on industrial emissions and the European Pollutant Release and Transfer Register to address emissions and reporting of PFAS from industrial plants.	ORANGE The proposals by the EC for the IED and the E-PRTR only included a very limited number of PFAS.	ORANGE Some of the provisions partially address emissions and reporting of PFAS, but not including the full list of PFAS is a missed opportunity
Water	Reinforcement of provisions on combination effect, revision of EQS Standards	YELLOW The adoption of the revised WFD	ORANGE The proposal improves the

	and of the Groundwater Directive to add PFAS.	is ongoing and a Council opinion expected very soon.	situation but does not fully address the effects of chemical cocktails
	#31 Introduce or reinforce provisions to take account of the combination effects of chemicals in water, food contact materials, food additives, toys, detergents, cosmetics	YELLOW The adoption of the revised WFD is ongoing and a Council opinion expected very soon.	ORANGE The proposal improves the situation but does not fully address the effects of chemical cocktails
	#39 Review of the annexes of the Environmental Quality Standards Directive and of the Groundwater Directive to add PFAS where possible as a group	GREEN The adoption of the revised WFD is ongoing and includes the list of 24 PFAS	ORANGE The proposal has acknowledged the issue but has failed in including the full list of PFAS
Circular economy	Measures focused on increasing transparency on substances of concern and restriction of chemicals of concern.	ORANGE Although the Ecodesign Directive is close to be formally adopted, it did not fully tackle the actions of CSS.	YELLOW The inclusion of a wide definition of Substances of Concern and transparency requirements meets the CSS ambition. However, the references to restrict chemicals introduced by the EP, although welcomed, do not match the CSS commitment.
	#7 Introduce legal requirements on the presence of substances of concern in products, including PFAS, through the initiative on sustainable products	ORANGE Although the Ecodesign Directive is close to be formally adopted, it did not fully tackle the	ORANGE There have been positive steps taken for SoC and transparency and traceability, but the actions have fallen

		actions of CSS, including on PFAS.	short to achieve truly toxic free products and ban PFAS in specific product categories
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