EPAA Annual Conference 15th November 2022

Animal-Free Innovation: drivers and vision

NGO Perspective / EU chemicals

Emily McIvor

What a difference a year makes (1)

2021 EPAA conference . . .

CSS consultations: response to animal protection input?

Proposals include increasing animal test requirements

ECHA animal data for cosmetics ingredients / rejecting adaptations

Implementation of REACH last resort requirement questionable

Commission survey: non-animal methods reduce protection?

- 31/08/2021: European Citizens' Initiative "Save Cruelty Free Cosmetics, Commit to a Europe Without Animal Testing" launched
- 16/09/21: European Parliament adopts resolution "Plans and actions to accelerate a transition to innovation without the use of animals in research, regulator testing and education.

What a difference a year makes (2)

- 27/01/2022: REACH Competent Authorities, presented with options including long term objective, "minimise animal testing with eventual aim of complete replacement"
- 10/02/2022: Commission responds to European Parliament resolution on plans and actions to accelerate a transition to innovation without the use of animals
- 11/05/2022: PARC launches "to advance research, share knowledge and improve skills in chemical risk assessment in order to better protect human health and the environment"
- 31/08/2022: European Citizens' Initiative closes with 1.4 million signatures.
- 21/09/2022: 4th Annual Forum on Endocrine Disruption, validation process described / scientific need for robust new approaches clarified
- 29/09/2022: ECHA "The promotion of alternatives to animal testing is among the aims of the REACH Regulation and, therefore, part of ECHA's mandate since its establishment."
- EPAA, JRC, Commission: increased activity, addressing regulatory need
- REACH: legislative proposal delayed, science accelerating . . .

2022 for animal protection organisations









European Citizens' Initiative: SAVE CRUELTY FREE COSMETICS - COMMIT TO A EUROPE WITHOUT ANIMAL TESTING,





























































































































📤 Signatures collected online

1,413,383 / 1,000,000

② End of the collection period: 31/08/2022

Animal protection solutions: proposals, webinars, partnerships



20 October 2022 • 10:00 - 11:30 CEST

The Revision of EU Chemicals Legislation as a Step Towards Non-Animal Testing

animalwelfareintergroup.eu









10th PCRM/EPA/PETA-SCI (PEP) Co-organized Webinar on the Use of NAMs in Risk Assessment

May 11, 2022 10:00AM – 11:30AM EDT

A recording and slides from today's webinar will be posted at: www.thepsci.eu/nam-webinars







Next Steps



Chemicals Strategy for Sustainability: where to focus?

- REACH revision / One Substance One Assessment / data sharing
- Revision of the CLP Regulation / GHS
- CLP delegated act, Annex 1 new hazard classes
- Changes to cosmetics regulation and other sectoral legislation
- ECHA Founding Regulation
- Reallocation of EU technical and scientific work to EU agencies
- Directive 2010/63/EU 3Rs requirements
- Implementing animal-free innovation . . . the roadmap.

ECHA: present and future

March 2022 ECHA begins response to animal protection stakeholders

Management Board minutes note need to:

"address public and institutional concerns regarding animal testing. This could include an overview of ECHA's role, the regulatory framework and stakeholders' views and criticisms".

September 2022 Management Board considers proposal on animal testing:

invest in the areas where the Agency has relevant scientific-technical competences;

enhance the cooperation with the European Commission and other institutional partners to support developments of a European roadmap towards full replacement of animal testing,

increase visibility and stakeholder engagement.

Animal protection seeking to

Strengthen ECHA's role in replacing animal testing

Address scientific limitations of animal testing

Actively assist registrants wishing to avoid animal testing . . .

Chemicals Strategy, research actions

Replacement Roadmap for chemicals: starting point

High Level Roundtable background document on the CSS lists 85 actions, including (from the CSS itself):

"Foster multidisciplinary research and digital innovations for advanced tools, methods and models, and data analysis capacities to also move away from animal testing"

... But only one specific action on test method development:

"Accelerate the development and uptake of methods to generate information on endocrine disruptors through screening and testing of substances."

Strategic Research and Innovation Plan (SRIP) for chemicals (October 2022)

Improved methodologies and tools; address performance [. . .] protectiveness and the reliability of the conclusions . . .

Replacement Roadmap

Respond to the European Parliament

Calls on the Commission to improve coordination to achieve the goal set out in Directive 2010/63/EU by establishing a high-level inter-service taskforce, involving all key Directorates-General and agencies, to work with the Member States and relevant stakeholders to draw up an EU-wide action plan

Respond to citizens supporting the ECI

- 1. Protect and strengthen the cosmetics animal testing ban. Initiate legislative change to achieve consumer, worker, and environmental protection for all cosmetics ingredients without testing on animals for any purpose at any time.
- 2. Transform EU chemicals regulation. Ensure human health and the environment are protected by managing chemicals without the addition of new animal testing requirements.
- 3. Modernise science in the EU. Commit to a legislative proposal plotting a roadmap to phase-out all animal testing in the EU before the end of the current legislative term.

Conclusion and thanks, collaboration is key

ECI campaigners & supporting brands,
 Dove and The Body Shop (& more)

- Scientists & funders
- International collaborators
- The EPAA & Partners; Industry, Commission
- ECHA, for the promise of new vision and leadership
- MEPs and citizens
- Thanks to everyone turning the tide . . .



Thank you for listening

Emily McIvor

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