

## **Political Agreement on new joint chemicals initiatives 2018-21**

*Informed consumers, fair conditions for enterprises, less impact on health and the environment, and effective regulation and control of the most harmful chemicals. These are the main points in a new agreement on chemicals in products and food.*

The Government, the Social Democratic Party, the Danish People's Party, the Red-Green Alliance, Alternativet, the Social-Liberal Party and the Socialist People's Party will safeguard Danes and the environment against harmful chemical substances. We are exposed to chemical substances no matter where in the world we find ourselves. Therefore focus on protecting human health and the environment is vital, as well as focus on responsible production and use of chemical substances. We should be able to exploit the advantages of chemicals without being exposed to adverse effects.

We need more focus on the groups most vulnerable to chemical substances - unborn babies, children and young people because this agreement reaches into the future. Therefore, sustainable initiatives are required for consumer goods and food products, and we must keep consumers informed so that they can make safe choices.

We need more knowledge about the health effects of chemicals in the products around us. Therefore, there must be more focus on risk assessments of consumer products etc. and the chemicals in them; not least for the most vulnerable groups, and action must be taken if these assessments show that the products contain substances that may entail a risk. There must be sharp focus on monitoring, investigating and controlling consumer products. Consumer protection must have high priority with regard to food products and food packaging, so that all Danes can be confident that their food is safe and does not contain harmful chemicals. Risk assessments are an administrative tool used to set requirements for the content of chemical substances with hazardous properties in individual products or food.

The agreement on the joint chemicals initiatives are based on the long-term vision in the EU's 7th Environment Action Programme for a non-toxic environment in which citizens are protected against environmental impacts and risks to their health and well-being, and this requires special initiatives in relation to chemicals in products and food. Denmark must therefore strengthen its position as a country in which innovation, the environment and safety go hand in hand with fair competition. Production and trade with chemical substances and products is global. Ambitious regulation of the chemicals area should therefore generally be set at EU level, and as far as possible globally. Denmark must target work in order to establish strong EU regulation of harmful substances and to actively contribute to EU chemicals policy, so that we have the best consumer protection and the most equal competition. We must help secure a high level of protection for all citizens and the environment.

Merging the environment and food ministries has provided entirely new opportunities for cross-cutting protection initiatives in the chemicals field so that a new joint agreement can include industrial chemicals, consumer and biocidal products, food products, and food contact materials. The initiatives also cover research and knowledge development, EU regulation, information and guidance, as well as inspection and control tasks. Assessment of the effects of the 2014-17 initiatives has demonstrated that, overall, the benefits from the initiatives significantly exceed the costs. The Government, the Social Democratic Party, the Danish People's Party, the Red-Green Alliance, Alternativet, the Social-Liberal Party and the Socialist People's Party therefore want to continue and expand the previous strong initiatives. We must help secure a high level of protection for all citizens and the environment.

#### Informed consumers

Consumers should be confident that they are buying safe products and food. This places high demands on the credibility of information. Honest information in communication for consumers about the short-term and long-term effects of chemical substances will help in this context. Particularly vulnerable groups in the population are entitled to extra focus. Protection of unborn babies, children and young people must therefore have the highest priority. Stronger, simple, consistent and preventative information about chemicals in products, food and food contact materials, for example ecolabels, helps consumers to make informed choices. Overall, the initiatives will also include advice for consumers who want to take extra care. There must be better access to knowledge about chemical substances in food and consumer products through utilising digital media.

#### Fair opportunities for enterprises

The strongholds of Danish enterprises should be exploited. Strict EU regulations secure fair competition, and enterprises that take the lead have good opportunities for growth by taking early action to substitute to greener alternatives and getting involved in the circular economy. The chemicals initiatives must contribute with input to implementing the EU plastics strategy. It is also important to ensure that there is adequate good data to secure responsible use and to avoid substitution with substances that are no better than the original. Denmark must work to improve the quality of REACH registrations by enterprises, including with regard to data on use and exposure as well as information on the hazards of substances by evaluating registration dossiers and proposed tests to make sure that adequate knowledge is available. Small and medium-sized enterprises in particular must be advised about legislation, risk assessment and risk management. This also applies for online traders, which are becoming increasingly significant in the market. Initiatives must be launched to ensure that products with harmful substances cannot be imported to Denmark and the EU from third countries, including with regard to recycling imported products in the circular economy. In order to help enterprises to comply with the regulations and to avoid undesirable chemical substances in food and food contact materials, guidance for sectors and enterprises will be drawn up.

Enterprises must have the right tools and be secured better framework conditions so that they can operate competitively in Denmark and abroad. We must contribute to increased growth while at the same time ensuring consumer and environmental protection.

#### The five adverse effects in focus

The chemical substances of highest concern must be eradicated from products that Danes use in their daily lives, and they should also be excluded from food products if concentrations lead to a risk for human health. This is especially relevant for particularly vulnerable groups; unborn babies, children and young people. Danish initiatives must focus on the most harmful chemical substances in consumer products, biocidal products, food and food contact materials. A strategy must be developed to address chemical induced allergies in the EU and at national level with the aim to secure enhanced, coordinated regulation of allergenic substances.

Endocrine disruptors must continue to be of high priority, and in this context, there must be work to improve the criteria and ensure continued research and knowledge-building in the field as well as to influence EU legislation. New links between chemicals and the so-called “new diseases” must be investigated. There must also be continued focus on developing and improving test methods and on relevant exposure routes. Possibilities to assess groups of substances instead of individual substances must be examined, including assessment of the 'cocktail effects' of substance groups and any new linkages between chemicals and diseases. There must be active Danish participation in common EU work to identify substances for regulation under the REACH and the CLP regulations based on the latest knowledge.

Consumers should be protected against substances that:

- are carcinogenic, mutagenic, or toxic for reproduction (CMR substances),
- affect brain development,
- are endocrine disrupting,
- are allergenic, or
- are of high concern to the environment (PBT / vPvB substances).

### Research and knowledge-building

There is a need to build knowledge and collect data on chemical substances so that we can take action where and when it is required for the most harmful substances and substances of concern. Priority on research, development and knowledge-building must therefore continue. This applies for allergenic and endocrine disruptors, including their significance for new diseases such as obesity, diabetes, chronic tiredness and effects on brain development. There must also be more focus on the effects of individual substances in combination with each other.

The objectives of the initiatives are to limit exposure to the harmful chemicals and chemicals of concern, to increase substitution with less harmful chemicals, and to promote the circular economy without unintended environmental and health problems. New knowledge and reliable documentation are important for influence in the EU and internationally, and Denmark will strengthen important areas in which we already play an important role internationally, e.g. endocrine disruptors.

The parties to the Agreement agree on enhanced research efforts into endocrine disruptors, among other things in the context of fertility and through biomonitoring. A concrete proposal on a scientific structure will be presented in early 2018 to the parties to the Agreement before actual implementation. The initiatives will build on existing competencies in the current CeHoS and EDMaRC knowledge and research centres.

### EU strategy

Denmark must encourage and contribute to progress in the EU with a view to strong chemicals regulation that bans the worst chemical substances. Denmark must lead the way and exploit its strongholds, where there is a scientific foundation based on solid scientific documentation for the hazards of substances and the risks of using them. Therefore, classification and restrictions must be based on scientific documentation so that resources are focused on regulation of the substances that entail significant risks. Initiatives will also be taken to regulate whole groups of substances instead of only regulating one substance at a time. Danish work on introducing EU regulation must be based on alliances and collaboration with other countries with the same approach to substances of concern as Denmark. Denmark must make a strong contribution to the EU Non-Toxic Environment Strategy based on the 7th Environment Action Programme and follow-up to the Commission's review of REACH. During the Agreement period, in cooperation with future EU Presidencies, Denmark must hold a high-level conference, if possible with ministerial participation, on expanded and strengthened chemicals policy and chemicals regulation. The parties to the Agreement on chemicals initiatives 2018-21 will meet in early 2018 to discuss how Danish strongholds can be used actively to influence EU regulation. If further EU regulations either cannot or should not be established, e.g. due to a lack of documentation, other initiatives will be

implemented if there are suspicions of environmental or health-damaging effects. Denmark will continue working with the REACH-UP countries.

#### Control and monitoring

Control and enforcement, including sanctions as well as mapping and monitoring are necessary, and expectations regarding control are increasing in line with increasing imports via online trading and new obligations, among others in the biocides area. The practice regarding sanctions by the Chemical Inspection Service of the Danish EPA will be evaluated during the Agreement period with a view to possibly tightening sanctions against repeated infringements of the regulations. Import controls will be strengthened, including possibly physical inspections of consumer products at border crossings. Controls must be risk-based and must utilise the instruments that promote long-term compliance by enterprises. Monitoring must provide knowledge about the presence of chemical substances and must be translated into guidance and learning at enterprises. This will help secure a high level of protection for Danes and the environment. Enterprises should not be able to reap competitive advantages by breaching the regulations and exposing the population and the environment to unnecessary risks. We will establish targeted controls of food, food contact material, biocides, and other consumer products. Monitoring must be extended to set priorities for control initiatives by the authorities and so that food enterprises can strengthen their own internal controls. We must strengthen control where the risks are greatest, and apply the most effective methods and instruments. We must also cooperate with the European inspection authorities and control initiatives must be coordinated widely throughout the EU. It is important for the competitiveness of Danish enterprises that all enterprises comply with the chemicals regulations on equal terms.

## Financial aspects

DKK 284.8 mill. has been earmarked for the new common chemicals initiatives 2018-21.

	2018	2019	2020	2021	Total
DKK mill. in 2018 prices					
Total per year	71.2	71.8	70.9	70.9	284.8

The Agreement on new common chemicals initiatives 2018-21 will be financed by:

1. Existing allocations to areas under the Ministry of Environment and Food
2. A further DKK 20.0 mill. from the 12 November 2017 agreement between the Government, the Danish People's Party and the Danish Social-Liberal Party on business and start-up initiatives.
3. A reduction in free places at universities and grants for foreign students
4. Withdrawal of the travelling allowance for external examiners (*zone 4-censorrejser*)

The parties to the Agreement will meet every year to follow up on the Agreement. A short status report will be drawn up every year.

## **Annex to the political agreement on new joint chemicals initiatives 2018-21**

### **Informed consumers**

#### *Initiatives at the Ministry of Environment and Food*

##### Consumer information and campaigns

The information must generally help consumers so that it is easier for them to navigate the range of products and habits in the home with regard to “everyday chemicals”.

- Specific advice will be provided via the social media, news and websites about how to reduce exposure to, for example, suspected endocrine disruptors in daily life, or in other areas in which there is reason to be cautious. The target groups will primarily be set on the basis of the goal to protect unborn babies, children and young people, as these groups are generally the most vulnerable to exposures to chemical substances.
- Two major individual campaigns could be completed: for example, a campaign aiming at young people moving away from home for the first time, or a meeting in the National Council for Children about chemicals. These campaigns could be supplemented with other focussed information on the social media, websites or partnerships with other players. Other agencies will be involved in preparing the information activities, e.g. the Danish Medicines Agency and the Danish Health Authority. A bridge-building solution will be developed to coordinate chemicals information on the Danish EPA and the Danish Veterinary and Food Administration websites.
- The app *Tjek kemien* (Check chemistry) that enables consumers to avoid products containing Candidate List substances will be promoted and disseminated in the EU.

##### Knowledge about biocides/safe use of biocides at work

The aim of the continued information efforts by the Danish EPA for biocides is to ensure that both consumers and professionals use biocidal products correctly.

- Consumers should be informed about alternative methods to combat pests, including non-toxic solutions as well as measures to avoid development of resistance in connection with controlling pests in households, especially in connection with the use of disinfectants, insecticides, algacides and wood preservatives.
- Professionals need training and sector-oriented guidance about correct and sustainable use of biocides, especially pest and insect control services, services for renovation after mould /water damage, roof cleaners, services within the care and elderly sectors, etc.
- Furthermore, the Danish pesticides and biocides database will be expanded so that it is easier to find out which biocidal products are legal to possess and use.

##### Allergy strategy

An allergy strategy must be drawn up aiming at enhancing initiatives against allergenic chemicals in order to increase the level of protection and reduce the number of people who develop contact allergy. The initiatives must strengthen Danish influence on European cooperation in the area, including influence on new regulations and setting international guidance for assessing the allergenic properties of chemicals.

- The strategy including the research and monitoring by the National Allergy Research Centre will provide input for consumer information about contact allergy aimed especially at children and young people.
- The strategy will include an analysis of the number of people affected to some degree or to a high degree. The most allergenic substances will be identified through patient registration by the National Allergy Research Centre and/or surveys of the population. These substances should be managed via REACH or product-specific legislation, depending on where the substances are used.
- The strategy will include initiatives to classify the most allergenic substances under the strictest category, if there is adequate data to support this, which will lead to an increased level of protection for both consumers and employees. The work will also address methods to test and assess chemical substances for their contact-allergenic properties.

### Ecolabels

Consumers must be encouraged to ask for ecolabelled products and supply must be increased in areas where there is currently only a limited range of ecolabelled products, e.g. baby products, toys, electronic equipment, textiles and clothes. This could be by Ecolabelling Denmark organising thematic campaigns and information initiatives, for example in collaboration with retailers and relevant authorities.

- DKK 4 mill. has been earmarked to have more products covered by the ecolabelling scheme, and to create more awareness of the scheme. Of this amount, DKK 3.5 mill. has been allocated to Ecolabelling Denmark.
- More than DKK 1 mill. has already been allocated outside the Agreement for an ecolabelling subsidies scheme. This scheme will receive a further DKK 0.5 mill.

## **Fair opportunities**

### *Initiatives at the Ministry of Environment and Food*

#### REACH and CLP

The Danish contribution to REACH and CLP through assessing and regulating substances must focus in particular on protection of vulnerable groups - unborn babies, children and young people.

- Work to improve the quality of REACH registration by industry through evaluating the registration dossiers and test proposals, and preparing substance evaluations for five strategically prioritised substances in order to determine whether further testing or regulation is necessary.
- Participate in collaboration to find the most appropriate EU regulation of prioritised substances and prepare proposals for EU regulation.
  - harmonised classification of hazardous substances
  - inclusion of substances of very high concern in the REACH Candidate List
  - restrictions on use for substances that present a risk to man or the environment
  - promote regulation of whole substance groups instead of regulating substances one by one. For example, this could be groups of fluorinated substances, brominated flame-retardants, bisphenols and phthalates.
  - Work on common substance-group assessments will be promoted under REACH-UP and other relevant EU alliances.
- Participate in the ECHA committees, as stipulated in the REACH Regulation, and EU decision processes, including obtaining mandates from the Government and the *Folketing*.
- Enterprises will be guided and advised through the REACH and CLP Help Desk.
- Input to other relevant EU legislation, including regulations on cosmetics and toys.

#### The circular economy and plastics

- Management of chemicals is crucial if a circular economy is to work. This includes plastics. The initiatives are directed specifically towards the EU plastics strategy, which can supplement other initiatives to promote the circular economy in Denmark.
- Work will also aim at developing specific initiatives regarding PVC.

#### Innovation in chemistry

- Initiatives will support innovation by enterprises to replace undesirable chemicals in production and products with better alternatives; green chemistry. This builds on the existing "Kemi i kredsløb" substitution partnership.
- The Danish EPA will prepare a report on how to prevent chemicals harmful to health and the environment from becoming a barrier to the circular economy. The report will also examine whether it is relevant to involve individual sectors such as the textiles sector.

#### Information for enterprises about biocides and biocides subsidies

- The Danish EPA will prepare short, action-oriented, sector-specific guidance on biocides, including practical examples, in collaboration with the Biocides Panel. The Biocides Panel will continue. The Biocides Help Desk and participation in information meetings will also be given priority.
- The Danish EPA will discuss enterprises' biocides issues of principle with the other EU countries in order to ensure harmonised solutions.

- Furthermore, the scheme for subsidies will continue for enterprises that have developed less harmful biocidal products and require support for product authorisation under the significantly less costly and simplified authorisation procedure, which also allows easier access to markets in the other EU countries. Subsidies will also be available for authorisation of less harmful active substances.

#### Guidance for enterprises on chemicals in food products

- Guidance for sectors and enterprises will be drawn up to help enterprises to comply with the regulations and to avoid undesirable chemical substances in food products. The guidance will aim at enterprises' needs for specific knowledge about regulations and risk parameters for chemical substances in food products. The guidance materials will be prepared in collaboration with sectors and food inspectors and this will contribute to common understanding of requirements and more user-friendliness. The guidance materials will also be used by food inspectors from the Danish Veterinary and Food Administration and will thereby contribute to more uniform inspections.

#### PVC initiatives

Initiatives against harmful substances in PVC must be strengthened and substitution with other types of material should be investigated.

A number of specific proposals will be drawn up and presented to the parties to the Agreement in 2018.

## **The five adverse effects in focus**

### *Initiatives at the Ministry of Environment and Food*

#### Global conventions

Chemicals are traded and distributed globally, and Denmark aims to be a visible player in work to strengthen regulation globally.

- With regard to the Minamata Convention on mercury, Denmark will contribute to the work on effectiveness evaluating of the convention, management of mercury in waste, safe storage and reporting.
- In 2017, Denmark joined the Persistent Organic Pollutants Review Committee (POPRC) under the Stockholm Convention. The POPRC reviews chemicals proposed for listing under the Stockholm Convention according to the POPs criteria.
- The importance of safe management of chemicals has been emphasised in the UN 2030 Agenda and the Sustainable Development Goals (SDGs).
- In the period from 2018-2021, priority will be on active Danish participation in the process to develop recommendations for a SAICM beyond 2020 regime for sustainable chemicals and waste management globally after 2020 and on the sustainable development goals for chemicals and waste. In 2018-19, Denmark will also work to support implementation reach the 2020 goals.

#### Biocides

Active Danish participation in EU work on biocides is crucial for our ability to ensure safe use of biocides in Denmark for protecting both the environment and health.

- The Danish EPA's work is also extremely important for the many Danish enterprises and sectors, including agriculture, that are affected by biocides regulations. Danish participation in this work secures better guidance and information for Danish enterprises about the biocides legislation.
- The most important EU tasks are risk assessment of biocide active substances, development and adoption of harmonised guidance for national approval of biocide products, as well as EU approval of an increasing number of biocide products that can be placed on the market throughout the EU without special national risk assessment. New guidance for authorisation/approval work will be developed as authorisation of active substances and applications for additional product types and new uses come up. The goal for active participation by the Danish EPA in the EU's work on biocides is to secure Danish interests regarding health and the environment as well as the opportunities of Danish enterprises for growth and jobs.
- Targeted work in the EU with special focus on active substance approval and Union-approved products to which vulnerable groups come into contact (e.g. disinfectants, insecticides and biocide-treated articles) will have a significant impact for these groups.

#### Prepare regulation of CMRs, endocrine disruptors, neurotoxic substances and PBT/POPs

This initiative focuses on preparing regulation of substances that can affect brain development, are endocrine disrupting, are CMR (carcinogenic, mutagenic, or toxic for reproduction), or that are of high concern in the environment (PBT/vPvB substances). We have come a long way with phthalate initiatives, and we have harvested good experiences. Therefore, we will build further on this experience with regard to regulation of new substances such as fluorinated substances, brominated flame-retardants and bisphenols. These substance groups are likely to be relevant for a more systematic approach to regulation.

On the basis of a regular assessment to identify where the greatest needs lie, the framework can be set for initiatives within the following areas:

- A list of endocrine disruptors will be developed in cooperation with other countries with a view to establishing input for EU regulation. Instruments can be developed to help consumers to avoid undesirable chemicals.
- Computer models (QSAR) will be developed and improved in order to predict how chemical substances affect human health and the environment, thereby contributing to identifying and regulating substances of particular concern.
- Initiatives regarding other substances of very high concern, such as CMR substances, substances harmful to brain development (with special focus on protecting pregnant women/the foetus) and persistent substances that accumulate in humans and other living organisms.
- Better regulation and better information for consumers on avoiding undesirable chemicals with focus on protecting particularly vulnerable groups, such as pregnant women and young children.

### Nano

As part of the 2012 Danish Government budget (Finance Act), DKK 24 million was allocated in 2012-15 for better management of nano ("*Bedre styr på nano*"). The Danish Inventory of Nano Products was set up as part of these initiatives to monitor the spread of nanoproducts in Denmark. The register obligates producers and importers of a number of consumer products with nanomaterials to report information about products that release nanomaterials. Previous initiatives in the area must be followed up.

- When the results of the current checks on the Inventory of Nano Products are in place, the parties to the Agreement will discuss whether there is a need to change the Danish nano inventory.

## **Research and knowledge-building**

### *Initiatives*

#### More research on endocrine disruptors with increased focus on effects in humans

Research and knowledge-building on endocrine disruptors should be continued with an increase in activities related to observations of endocrine disruptors in humans, including identification of the significance of endocrine disruptors for new diseases such as obesity, diabetes, impacts on brain development, and late-life effects.

The activities should, however, have a broader focus than just human studies in order to secure the best possible basis for subsequent common European regulation. Therefore, the activities must also include studies on endocrine disruptors in animal models and effects in the environment.

The objective is to establish the necessary knowledge and to secure the competences that will facilitate new regulation of endocrine disruptors. Therefore, initiatives will build on the existing competencies in the current CeHoS and EDMaRC knowledge and research centres.

#### Activities under the initiatives include the following:

- Gather expertise related to studies on humans, effects on cell cultures and animal models, and effects in the environment to ensure a holistic approach to assessment of endocrine disruptors and their effects.
- Investigate through biomonitoring the occurrence of endocrine disruptors and their effects/combination effects in the Danish population.
- Create knowledge on the links between levels measured in humans and the risks of harmful effects.
- Build up new knowledge about endocrine disruptors that supports preventative work by the authorities to prevent unwanted effects in humans and the environment, including knowledge that can contribute to:
  - identification of suspected endocrine disruptors,
  - assessment of whether substances are endocrine disrupting and how they can be grouped,
  - risk assessment as a basis for regulation of the endocrine disruptors identified.
- Develop methods to assess endocrine disruptors.
- Provide scientific advice for the authorities.
- Share information about endocrine disruptors with other researchers, authorities and the public, e.g. at conferences, information seminars or similar.

#### National Allergy Research Centre

- The National Allergy Research Centre will continue the next four years. The objective of the Centre is to prevent allergy to chemical substances. The primary activities of the Centre are; research based knowledge-building, monitoring the incidence of allergy to chemical substances by registration of cases in a national database, disseminating the Centre's knowledge, training/education activities, as well as consultancy for national and international authorities.
- The Centre's research on allergenic properties of chemicals and consumer exposure to these substances will help establish the knowledge necessary to facilitate new regulation of allergenic chemicals.
- Researchers from the Centre participate as experts in EU, WHO and OECD bodies, for which they have been selected due to their scientific work. The work undertaken by the

Centre can therefore help strengthen Danish influence in EU discussions and decision processes in the allergies field through several channels.

- Research and monitoring by the National Allergy Research Centre will provide input for consumer information about allergy aimed especially at children and young people, as many develop allergies in their early teens.

#### Research projects between the National Food Institute and the Danish Veterinary and Food Administration

The research projects in the framework agreement between the National Food Institute and the Danish Veterinary and Food Administration are an important basis for all regulation, control and guidance on chemicals in food, the environment and consumer products, and they provide solid risk assessments based on knowledge about toxicity and exposures.

The knowledge realised under the political agreement on food (*Fødevareforlig 3*) will be applied in practice. The projects currently in progress under *Fødevareforlig 3* will be completed in 2018. There is a need to build further on these results in order to harvest the full benefits of the initiatives and to ensure a certain continuity in Danish initiatives areas for chemical substances. The initiatives are likely to cover four areas:

- Further development of methods for risk assessment of combination effects of chemical substances from environment and food-product exposures. Improvement and use of models for risk assessment of chemical substances, including combination effects.
- Quantification of effects harmful to health and economic consequences caused by chemical substances through using different metrics, including economic metrics. Preparation of overall assessments for several food types (risk-benefit).
- Development of strategies to identify and assess new risks in food contact material and possibly other consumer products. Simultaneous screening for several chemical substances, e.g. using new sensor techniques.
- New knowledge about how intestinal microflora affects the exposure to chemical substances. Initiatives will lead to better risk assessment for vulnerable groups such as children and pregnant women.

#### Annual screening of research initiatives

Further to the ordinary research initiatives, an annual screening will be conducted on new knowledge about the hazards of substances that require new initiatives.

- This will be a recurring point in connection with the annual status discussions between the parties to the Agreement.

## **Control and monitoring**

### *Initiatives at the Ministry of Environment and Food*

#### Control regarding REACH and CLP

- The REACH Regulation includes a number of control obligations such as registering substances manufactured or imported in quantities of 100 tonnes or more, authorisation of the use of substances of very high concern and restrictions on use. From June 2018, all substances manufactured or imported in quantities of between 1 and 100 tonnes will have to be registered. This means further control obligations in the upcoming action plan period.
- The CLP Regulation also contains a number of control obligations that will also be increased in the upcoming agreement period as the common harmonised CLP regulations entered fully into force in mid-2017.

#### Control regarding the Biocidal Products Regulation

- During the Agreement period, there will be new product categories covered by the approval requirements in the biocides area too. These categories will also need to be subject to control (antifouling, veterinary hygiene, disinfectants for food and the food industry, hygiene for humans and disinfectants). Enterprises that intentionally fail to comply with the approval/authorisation requirements (“free riders”) have a strong incentive to find ways into the market. Furthermore, there will also be controls regarding the new requirements applicable for treated articles (textiles, clothing, etc.) that they may only contain authorised active substances.

#### Controls of consumer products, including stronger controls on imports

- Part of the proactive control initiatives (control campaigns) will have special focus on articles and products from non-EU countries. As far as possible, proactive control initiatives will among other things be organised so that products do not reach stores. Initiatives will be prioritised on the basis of the areas assessed to comprise the greatest risk.
- Import controls will be strengthened, including possibly physical inspections of consumer products at border crossings. Controls will be risk-based and they will utilise the instruments that promote long-term compliance by enterprises.
- The Danish EPA will evaluate its practice for reporting to the RAPEX system. The parties to the Agreement will be briefed on the evaluation.

The practice regarding sanctions for the above areas at the Danish EPA Chemical Inspection Service will be evaluated during the Agreement period with a view to possibly tightening sanctions, including regarding repeated infringements.

#### Investigations of consumer products

- The initiatives include continuation of systematic mapping of chemical substances in selected consumer products and generation of knowledge about which substances (primary substances covered by the five in focus) are present in products, with primary focus on products for children and young people. The investigations provide unique knowledge about the chemicals consumers can be exposed to, and the results are important input for preparation of guidance for consumers/industry/sectors and for proposals for new EU legislation. In addition to about four projects, the initiatives also include participation in standardisation work and conducting thematic days for the toy and cosmetics sectors, for example.

### Control and competence development for inspectors etc.

- Food enterprises are still finding it difficult to include chemical substances in their internal control processes because of a lack of knowledge. The initiatives in the political agreement on food (*Fødevareforlig 3*) to control undesirable chemical substances in food will be continued. Focus will be on whether chemicals are included in internal controls and checks by food enterprises, for example whether they examine the risk of process contamination, use of food contact material and content of natural toxins.
- Inspectors should have more knowledge about chemicals. Interactive courses will be developed in which inspectors are taught about the regulations and, on the basis of cases and exercises, they will build up their knowledge to be able to advise and inspect enterprises at a high scientific level. Road shows will be held at Food-Inspection Units about relevant and topical issues within the field of chemicals legislation.

### New controls of biocide residues in food products

Maximum residue limit values must be set where relevant for biocide residues in food products. Inspections of labelling and the use of biocides in food establishments.

**EU strategy (in addition to the financing under the other headings, these initiatives will be financed through Finance Act appropriations to the Ministry of Environment and Food)**

*Initiatives at the Ministry of Environment and Food*

- Danish chemicals initiatives relating to research and knowledge-building will be targeted and applied actively so that they contribute to progress in EU regulation of, for example, allergenic, endocrine disruptors, or neurotoxic substances. The scientific basis will be scientific documentation that provides evidence or significant indications of harmful effects on humans or the environment.
- If there is a scientific basis, Denmark will aim to be at the forefront through proposing EU regulation, including work to have relevant substances of very high concern included in the candidate list and authorisation annex as well as restrict manufacturing, placing on the market or use of substances that comprise a risk to humans or the environment (the restriction annex).
- Danish pressure to address phthalates of concern will be maintained and Denmark will strive to influence the EU process. Work will continue to promote regulation of phthalates in consumer products and textiles.
- In order to support work on EU regulation of substances of very high concern, in 2018 the Danish EPA will draw up a draft strategy for the substances that should be addressed, and this will be followed up in connection with the annual screening of the research initiatives.
- Danish work on proposing EU regulation will be based on alliances and collaboration with other countries with the same approach to substances of concern as Denmark. Denmark will continue working with the REACH-UP countries and other relevant collaboration partners.
- Denmark will make a strong contribution to the EU Non-Toxic Environment Strategy based on the 7th Environment Action Programme and follow-up to the Commission's review of REACH expected in late 2017.
- The Minister for Environment and Food will invite the parties to the Agreement to discussions on the Danish input to the European Commission on the Non-Toxic Environment Strategy in January 2018.
- Opportunities to hold a European/international chemicals conference at high/ministerial level will be examined.
- The Ministry of Environment and Food has supported projects conducted by the EEB (European Environmental Bureau) for many years, as we are in closest contact with this EU NGO and Denmark achieves the greatest advantage from cooperating with the EEB in connection with policy-making and specific matters.

- The Ministry of Environment and Food will also provide financing for the Danish 92 Group, one year at a time. The Danish 92 Group is a network of 25 Danish environment and development organisations which, since 1991, and with the 1992 Rio Conference as a springboard, has coordinated work by these 25 environment and development organisations.

## Economic overview of the new joint chemicals initiatives 2018-2021

	DKK mill. in 2018 prices
<b>1. Informed consumers</b>	<b>16.6</b>
1.1 Consumer information and campaigns	4.3
1.2 Knowledge about biocides/safe use of biocides at work	3.3
1.3 Allergy strategy	5.0
1.4 Ecolabels	4.0
<b>2. Fair conditions</b>	<b>67.0</b>
2.1 REACH and CLP	46.1
2.2 The circular economy and plastics	4.1
2.3 Innovation in chemicals	6.1
2.4 Information for enterprises about biocides and biocides subsidies	5.7
2.5 Guidance for enterprises on chemicals in food products	1.0
2.6 PVC initiatives	4.0
<b>3. The five adverse effects in focus</b>	<b>32.3</b>
3.1 Global conventions	6.5
3.2 Biocides	20.7
3.3 Improved regulation of CMRs, endocrine disruptors, neurotox and PBT/POPs	5.1
<b>4. Research and knowledge-building</b>	<b>107.6</b>
4.1 Stronger research initiatives into endocrine disruptors with stronger focus on effects on people	34.3
4.2 National Allergy Research Centre	18.9
4.3 Research projects between the National Food Institute and the Danish Veterinary and Food Administration	54.4
<b>5. Control and monitoring</b>	<b>61.3</b>
5.1 Control regarding REACH and the CLP Regulation	13.3
5.2 Control regarding the Biocidal Products Regulation	7.2
5.3 Controls of consumer products, including stronger controls on imports	7.8
5.4 Investigations of consumer products	18.0
5.5 Control and competence development for inspectors etc.	13.0
5.6 New controls for biocide residues in food products	2.0
<b>Total</b>	<b>284.8</b>