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What are the key factors driving chemicals management and control activity in 2024?

The EU's REACH and CLP continue to be key priorities for chemicals management activity, while regulatory activity in the US remains the second most important driver of work. Elaine Burridge reports on the 14th edition of Enhesa's Chemicals Management and Control Survey.

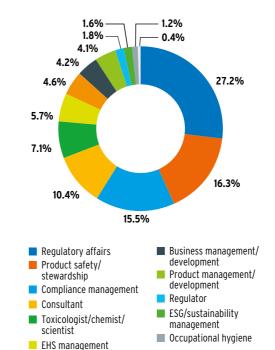
will likely come as no surprise that Europe's REACH regulation - with its many parts - yet again tops the list of chemicals management activities. That said, the number of safety and regulatory compliance professionals citing REACH as a key regulatory driver in this year's Chemicals Management and Control Survey has dropped by 11 percentage points to 82%.

One factor behind the fall is a significant drop in the number of respondents citing REACH evaluation related activities (39% to 25%) as being a key driver of work. Other areas cited less frequently than in last year's survey include dossier updates (down from 39% to 34%). Meanwhile registration and SVHC obligations were ranked by respondents as the two most important drivers of REACH related work and were cited by 47% and 44% respectively.

This year's respondents also reference the EU's chemicals strategy for sustainability (CSS) as another key regulatory driver, accounting for 45% of responses this time, a drop of six percentage points from 2023.

What is your primary job function?

Other (please specify)



IT

- An important objective under the CSS is a revision of the CLP regulation, with 63% of respondents reporting this as a major driver of their regulatory work. The European Council of Ministers and Parliament reached provisional agreement last December on the Commission's final CLP proposal, which brings in several changes to the regulation, as well as clarifying labelling rules and information required for selling products online.
- And it is not just CLP which is undergoing a revision. The long-awaited REACH revision has been delayed several times after originally being set for adoption by the end of 2022. The Commission left the proposed revision out of its 2024 work programme, but the revision could occur later this year once the new Commission is in place after the European parliamentary elections in June. The outcome of these elections will also determine how the EU moves forwards with the CSS.

US targets TSCA

- Outside of Europe US regulation is the second most important driver for survey respondents' workloads with 58% (up from 56% in 2023) citing US regulation (any) as a key driver of chemicals management related activity.
- Much of the US EPA's focus in 2024 will be on finalising after years of delays and missed deadlines - TSCA's risk management rules for the first ten high-priority chemicals. However, the agency is facing intense debate about its assessment methods, as well as a rising number of lawsuits, over key interpretations of the law
- The EPA will also be seeking to fill information gaps to support its chemical evaluations, especially for per- and polyfluoroalkyl substances (PFAS). Last year, the agency unveiled its TSCA reporting rules for PFAS, which requires companies to provide information on the use of more than 1,460 compounds going back as far as 2011. In addition, the four-yearly chemical data reporting rule (CDR) makes a return this year, with the submission period open from 1 June to 31 September and covering activities from 2020-2023.
- California's Proposition 65 law is cited by 33% of respondents as a key driver of work. A greater focus on PFAS - especially perfluorooctane sulfonic acid (PFOS), perfluorooctanoic acid (PFOA) and perfluorononanoic acid (PFNA) - is anticipated this year under Prop 65. California is also proposing to phase out PFAS in fabrics and personal care items, starting 1 January 2025.

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Leading regulatory drivers for survey participants (section one)

EU REACH (anv) US (any) EU Green Deal UK REACH Turkev

EU REACH registration EU chemicals strategy for sustainability (CSS) EU REACH Annex XVII Restrictions EU REACH SVHC obligations US: TSCA New Substance Notifications EU REACH dossier updates US: California Proposition 65 US: TSCA risk evaluations

Canada Chemicals Management Program China: management of existing chemicals Other US state legislation (Washington, Vermont etc)

Nanomaterials risk assessment: revised REACH information requirements for nanoforms

Chemicals Management regulations

National

of GHS on

transposition

classification.

labelling and

inventory

notification

regulations

US: California Safer Consumer Products Regulation

India Brazil Japan Australia Chile Taiwan Colombia Mexico Argentina Thailand Vietnam New Zealand Saudi Arabia Philippines South Africa Malaysia Russia Indonesia Israel

South Korea (K-REACH) EU REACH evaluation related activities EDC risk assessment China: management of new chemicals EU REACH authorisation activities Other EAEU countries Other Asia chemicals regulations Other LATAM countries Other Middle East countries Other GCC countries

Carribean countries Other African countries EU CLP regulation EU CLP Annex VIII Poison Centre Notification US HazCom 2012 (GHS) Standard Implementation of GHS in other countries China implementation of GHS Canada Workplace Hazardous Materials Information System (WHMIS) Brazil implementation of GHS Japan implementation of GHS ASFAN members implementation of GHS Chile implementation of GHS Vietnam chemical inventory Russia/EAEU implementation of GHS

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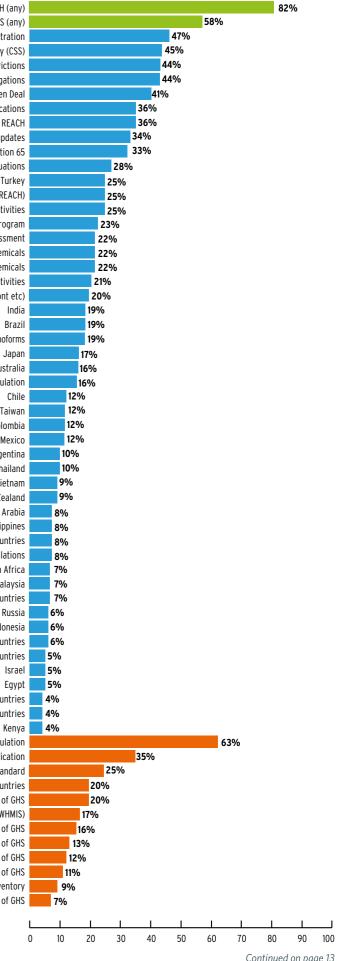
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	Pharmaceutical regulat
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	US Fifra antimicrobials regula
	Furniture safety regulat
	Veterinary product regulat
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	Micropla
	Environmental Social Governance (ESG) initiat
	European strategy for pla
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management	Sustainable development q
and other major	Global strategies for plastics/plastics pollu
regulations/	EU Chemical Agents Directive (CAD) and Carcinogens and Mutagens Directive (C
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	Other Extended Producer Responsibility/take-back regulat
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Environment	International Mar Hansport Association (IATA) Pangerous Goods (IMDG) (
Programme	Pic (Prior informed consent implementation of the Rotterdam Convent
(Unep)	

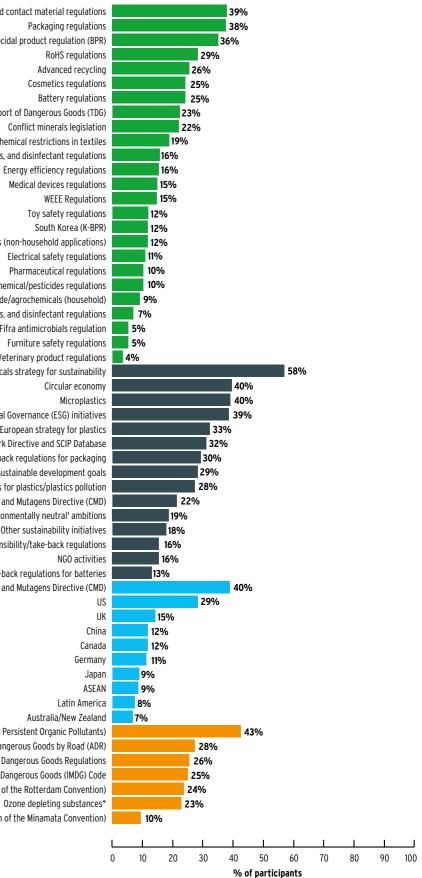
Mercury (implementation of the Minamata Convention)

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Leading regulatory drivers for survey participants (section two)

Food contact material regulations Packaging regulations EU Biocidal product regulation (BPR) tions cling tions tions TDG) ation tiles tions tions tions tions tions BPR) ions) tions tions tions hold) tions ation tions tions bilitv nomy stics tives stics base iging loals ution CMD) tions tives tions vities eries CMD) US UK hina nada nanv apan SEAN erica aland ants) ADR) tions Code



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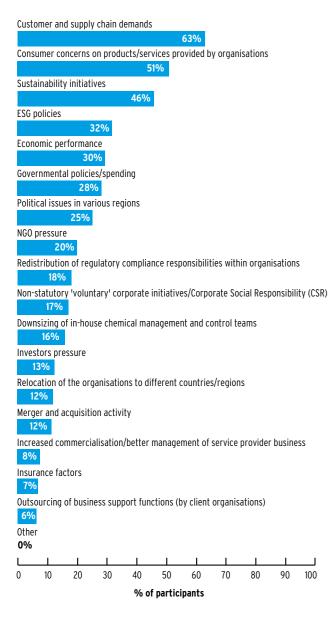
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Leading non-regulatory drivers



Meanwhile TSCA new substance notifications have seen an increase in the number of respondents citing them as a key driver of work this year - up from 29% to 36%

Turkey (KKDIK), South Korea (K-REACH), China, India and Japan also account for a significant portion of survey responses. Both KKDIK and K-REACH are cited as key drivers by 25% of poll participants, with 22% referencing China, 19% India and 17% Japan. The results for China and Japan were both three percentage points higher than last year's findings.

In December 2023, Turkey's environment ministry extended the registration deadlines under the KKDIK law - by up to seven years to between 2026 and 2030, depending on tonnage band and hazard properties. The move was in response to intense pressure from industry which had struggled to meet the end-2023 single registration deadline.

In South Korea, the National Assembly on 9 January passed amendments to two overarching chemical laws, namely K-REACH and the Chemical Control Act (CCA).

Under K-REACH, the annual volume at which new substances will have to be registered has been raised from 0.1 tonne to one tonne or above. The amendment also reorganises the management of toxic substances, which will be split between three categories depending on their hazard properties.

The National Assembly also introduced several changes to the CCA, including replacing the designation system for permitted, restricted and prohibited substances, as well as changing its process for non-hazardous substances to reporting only. In addition, it moved regulations on transporting chemical substances from the CCA to the Wastes Control Act.

China too has persisted in its efforts to strengthen chemicals legislation, especially in the areas of cosmetics under the Cosmetics Supervision and Administration Regulation (CSAR), electronics under ROHS 2 and hydroflurocarbons (HFCs) as it aligns with requirements under the Kigali Amendment to the UN's Montreal Protocol on Substances that Deplete the Ozone Layer.

The country is also progressing an action plan for toxic chemicals, including persistent organic pollutants (POPs) and endocrine disruptors. Under the plan, China's Ministry of Ecology and Environment (MEE) will develop an overarching chemicals framework, which is to be known as the Environmental Risk Management of Toxic and Hazardous Substances and will sit above MEE Order 12.

Progress is also anticipated within the coming year on China's plans to introduce QR codes that link to chemical information on labels, as well as transitioning to the eighth revised edition of the Globally Harmonized System (GHS) of classification and labelling of chemicals.

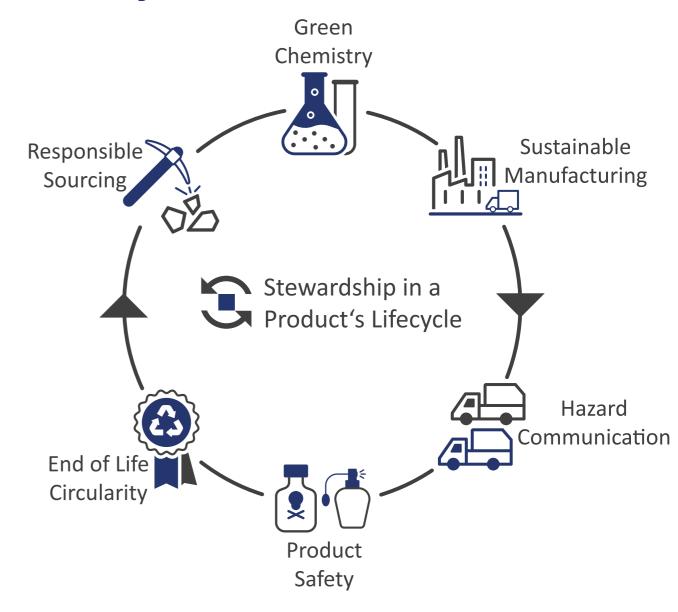
By contrast, progress in India on the development of an overarching chemicals law continues to be delayed. Any moves forward on this look unlikely until after the country's elections in mid-2024. Nonetheless, India did establish last October a chemicals inventory platform, which is expected to save costs for businesses that manually gather data, as well as support research and planning.

The ChemIndia portal is expected to expand significantly in 2024, providing a comprehensive list of organic and inorganic substances, alkali chemicals, dyes and pigments, pesticides and insecticides (within the chemical category), synthetic fibres, polymers, synthetic rubber (elastomers), synthetic detergent intermediates, olefins, aromatics, and other petrochemicals. It will offer analysis of hazard classifications, exposure routes and environmental impacts aligned with GHS.

Meanwhile, the Bureau of Indian Standards has continued to issue quality control orders, making national standards compulsory for a growing number of chemicals, with more expected in 2024.

In Japan, food contact materials, workers and safety data sheets (SDSs) are key areas of focus. The Ministry of Health, Labour and Welfare (MHLW) is currently revising its positive list system that covers all raw materials allowed for food contact, such as packag-

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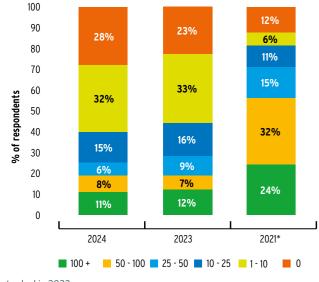


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ing, containers and utensils. The update is expected to be completed and enter into force from 1 June 2025.

The ministry is also strengthening controls on workplace exposure, with new measures due to take effect in 2024. In addition, during 2023 the MHLW expanded the list of chemicals for which companies must maintain SDSs and labels that comply with the UN'S GHS. There are various dates for enforcement between 2024 and 2027

If known, how many of the chemicals you manage within your company contribute to UN sustainable development goals?



*not asked in 2022

Non-regulatory drivers

Geopolitical and economic turmoil are once again impacting business conditions in the chemical industry. And while the shipping crisis and port closures of a couple of years ago have since eased, another crisis emerged in November last year with Houthi attacks on vessels in the Red Sea. This has consequently forced ships to divert around the Cape of Good Hope, lengthening journey times and driving up freight costs yet again for transporting chemicals and their raw materials.

Such factors will have helped to ensure that customer and supply chain demands remain the top non-regulatory driver of chemicals management activity in this year's survey, cited by 63% of respondents, which is down by four percentage points from last year's poll. And there is no change this year for second slot, taken once again by consumer concerns regarding products/ services - cited by 51% of respondents as a key driver of work.

There are, however, some notable shifts in responses in this latest survey. Respondents rate governmental policies/spending much lower this time around - indeed it falls to sixth place with just 28% of respondents citing them as a key driver of work - down from third place and 36% in 2023.

Economic performance drops too, now sitting in fifth position from fourth last year, and from second place in 2022. This is perhaps a reflection of the currently depressed economic environment as the cost-of-living crisis constrains consumer spending with higher energy and input costs also squeezing manufacturers' margins. Businesses are presently much more focused on containing costs as they seek to optimise operations and efficiency.

Perhaps surprisingly, NGO pressure slips again this year, to eighth place from fifth in 2023. But this could be a consequence of the fact that sustainability initiatives now rank as the third-highest non-regulatory driver, cited by 46% of survey participants.

Undoubtedly, the EU's Green Deal and push towards a circular economy, along with decarbonisation goals, have forced action on environmental sustainability higher up the corporate agenda. Industry is very focused on meeting mandated targets, such as for net zero and plastics recycling.

Who answered this year's survey

This year, 565 people took part in the Chemicals Management and Control Survey. More than half - 53% - are located in Europe, 23% are in North America and 17% in Asia, with the remainder split between Latin America (4%) and the Middle East and Africa (3%).

Breaking down respondents by industry, the vast majority (37%) work in chemicals, life sciences and similar.

Of the rest, 11% work either in service providers, other manufacturing or other; 6% are in consumer products, personal care and cosmetics; 5% in electrical and electronics; 4% in engineering, automotive, aerospace and similar; and 3% in healthcare, pharmaceutical and medical devices. Respondents from government and agencies account for 3% of input, and trade associations and professional bodies 2%.

Job functions are primarily in regulatory affairs (27.2%), product safety and stewardship (16.3%), or compliance management (15.5%).

Most survey respondents - 34% - come from businesses with more than 5,000 staff (enterprises), followed by 29% employed by companies with 250-5,000 staff (large companies). Businesses with less than 10 employees accounted for 7% of survey respondents.

Nearly a third of respondents say they manage between 100 and 1,000 chemicals within their companies, followed by 23% managing volumes of between 1,000 and 10,000.

Of these chemicals, between one and ten are chemicals of concern, according to most respondents (28%). In addition, between one and ten of these chemicals contribute to UN sustainable development goals (SDGs), which lists substances such as endocrine disruptors and PFAS as "issues of concern".



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What is the outlook for chemicals regulatory and management services in 2024?

While REACH continues to lead demand for chemical compliance services, cost constraints mean some businesses are focusing on needs instead of wants when weighing options for support and others are looking to build up their local markets. Elaine Burridge reports.

he chemical industry had a difficult year in 2023, and early 2024 is looking no different. Business operations are being dominated by a cost-of-living crisis that is leaving consumers with less cash to spend, persistently high inflation and energy costs, plus ongoing geopolitical tensions.

Demand globally has slowed for chemicals that go into a variety of products, including those for personal care, household use, construction and cars.

And for some service providers, that weaker demand has translated into their customers focusing on 'needs' rather than 'wants' in terms of complying with regulations: "Nowadays, due to the challenging circumstances, we see the tendency that clients differentiate thoroughly between services they really need now and other services that maybe can be postponed," says Michael Cleuvers, executive director, products and markets at knoell Germany.

Nevertheless, he says demand for the company's compliance services was fairly stable in 2023, with a strong need for REACH dossier updates, as well as master data management, safety data sheet (SDS) preparation and updates, and various global product stewardship services.

Most service providers report steady business, although it does appear to depend on the type of services sought. For instance, Antonio Conto, managing director of Chemsafe Consulting, reports an increase in SDS preparation and translation enquiries worldwide last year.

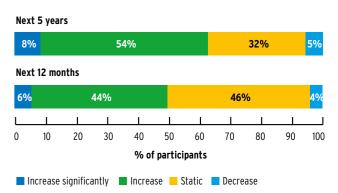
And Jana Zuffellato, sales and marketing manager at KFT Chemieservice in Germany, says demand rose because of ongoing regulatory changes, but adds: "At the same time, we notice that many existing customers are reluctant to invest in new products or expansion, which also directly leads to fewer orders for us.

"Because of geopolitical events, many customers have reduced exports to some countries, resulting in a drop in demand for services in the chemical compliance sector."

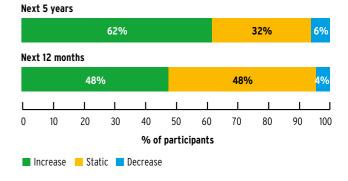
Her view is echoed by Matthew Kane, CEO at consultancy LKC Switzerland. He says: "The demand for our regulatory and technical services to the industrial chemical sector in Europe for 2023 declined compared to 2022. The cause we understand is likely to be the sluggish recovery from the significant impact of previous year results following the pandemic and geopolitical issues in Eastern Europe.

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He adds that supply constraints along with a rapidly changing and more restrictive European regulatory environment are creating further uncertainties for market investors, noting too that Europe's higher labour costs and regulatory expense compared with other markets such as China is "unhelpful"

Local sourcing

Aside from the usual compliance services, top of the list for LKC's clients were services for forward planning with regard to self-sufficiency and local supply sourcing, which highlights an ongoing trend of deglobalisation.

Many of CIRS's EU-based clients have changed their strategy in the past two to three years and are concentrating more on their local market, says Bryan Zhou, its deputy general manager and senior regulatory consultant.

According to Zhou, requests for complying with EU REACH, the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and poison centre notifications increased considerably last year, while other work was mainly related to Turkey's KKDIK, K-REACH, China REACH and UK REACH.

KKDIK also provided an uptick in demand at ReachLaw Finland (at its Istanbul office) for registration and only representative (OR) services, which was initially prompted by the end of 2023 deadline that was eventually postponed, says Ingrid Sekki, chief marketing and business development officer.

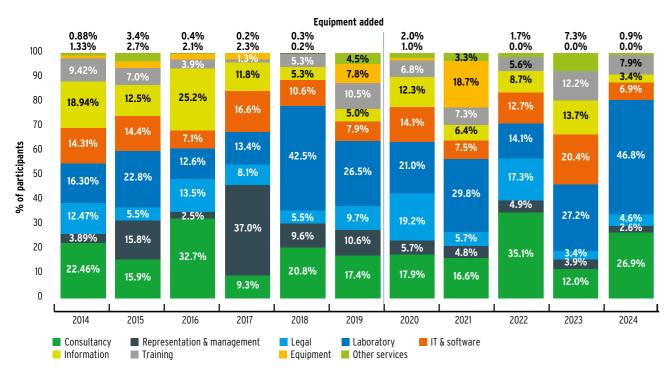


From a US TSCA perspective, clients worldwide were generally seeking assistance last year with persistent, bio-accumulative and toxic (PBT) substances and PFAS

In late 2023, the Turkish environment ministry delayed the single-registration deadline by three years, to 31 December 2026, for substances above 1.000 tonnes, with an extra two years to (31 December 2028) for substances between 100 and 1,000 tonnes. For those between one and 100 tonnes, the deadline was delayed to the end of December 2030.

The 2026 deadline also applies to substances classified as aquatic acute 1 and aquatic chronic 1 of above 100 tonnes per year and carcinogenic, mutagenic and toxic for reproduction (CMR) substances (categories 1A and 1B) at above 1 tonne per year.

Simultaneously, there was a growing interest in K-REACH registration services, driven by the pending deadline of 31 December 2024 for phase-in substances, Sekki adds.



Changes in proportion of spend on external chemicals management and control services



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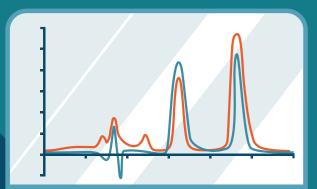
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How important are the following opportunities to your organisation?

New product development based on compliance insights 44% 29% 19% 7% New business opportunities based on safer products 42% 27% 24% Enhanced procurement, based on compliance insights 8% 23% 54% 15% Enhanced facility and worker safety based on strong hazard/exposure knowledge 20% 45% 29%

Enhanced customer service, based on product stewardship activities
6% 24% 49% 22%

Enhanced corporate strategy based on integrated chemicals management (eg sustainable development and circular economy)

8%		19%			52%	þ			21%	
	I	1	1	1	1	I	1	I	1	
0	10	20	30	40	50	60	70	80	90	100
				% of	respon	dents				
N	ot impo	ortant	Son	newhat i	importar	nt	Impoi	tant	Ess	ential

The Finnish consultancy also saw heightened demand for services related to per- and polyfluoroalkyl substances (PFAS), Ecodesign for Sustainable Products Regulation (ESPR) and other initiatives under the EU's Green Deal.

From a US TSCA perspective, clients worldwide were generally seeking assistance last year with persistent, bio-accumulative and toxic (PBT) substances and PFAS, says Rose Passarella, director of the Assuris Chemical Group.

Looking ahead to 2024, Europe and South Korea will be the two dominant regions in terms of demand for services, according to service providers. In Europe, they say help with REACH and OR, the Classification, Labelling and Packaging (CLP) regulation, and PCN will be the primary areas of demand.

High demand is also anticipated for K-REACH registration services to meet the upcoming deadline, as well as the next K-BPR deadline in 2025.

Sekki is also predicting "sustained support" for Turkey KKDIK registration, with an emphasis on lead registration, OR and SDS-related work.

Service providers active in the US market anticipate greater demand for assistance with Chemical Data Reporting (CDR). Dr Cleuvers says the CDR rule requires companies to report every four years to the EPA on the manufacture, processing and use of chemicals manufactured or imported that are listed on the TSCA Chemical Substance Inventory if volumes are above an applicable threshold.

The EPA has set the deadline for the 2024 reporting cycle (covering the period 2020-23), with the submission period running from 1 June to 30 September.

Dr Passarella adds that changes in substantiating confidential business Information may also raise questions, bringing more requests for help.

On 1 June 2023 the US EPA issued a final rule to update CBI requirements under TSCA in a move it said would increase transparency, modernise reporting and review procedures for CBI, and align with the 2016 amendments to the Act.

Looking at industry sectors, the key areas of focus for customers are many and varied, including chemicals, food and nutraceuticals, energy, cosmetics, biocides, energy, metals and mining, pharmaceuticals and electronics, plus anything that relates to green chemistry and sustainable/bio-based products.

Digitisation

Unsurprisingly – and unchanged from recent years – digitisation remains a major trend in the industry as an increasing number of systems become automated and the adoption of artificial intelligence (AI) grows.

In April 2023, new rules for the harmonised classification and labelling of new hazard classes entered into force. There are periods of transition, with the first deadline – applicable to new substances on the market – taking effect on 1 May 2025, with other deadlines in place for 2026 to 2028.

In Europe, the Green Deal and a shift to a circular economy are dominating corporate agendas, even if many companies have slowed their initiatives as they rein in spending and adopt a tight focus on controlling costs.

Certainly, the evolving regulatory landscape around Green Deal initiatives will likely see companies needing external expertise and support on regulatory and policy developments. Consequently, some service providers have set up or are developing new services around topics such as the energy transition, decarbonisation, biodiversity and sustainability, as they report growing demand.

As the chemical sector continues to push towards more sustainable products with a notable focus on materials innovation, there will be an increasing necessity for emerging technologies such as AI that will help in collecting data and predicting toxicity, as well as optimising processes.

ChemSafe

SERVICES



- · REACH and chemical safety
- Biocides
- Agrochemicals
- Cosmetics
- Medical Devices
- Food and Nutraceuticals
- Food Contact Material
- Pharma
- Safety
- Regulatory Affairs
- Pre-clinical development
- "In silico" evaluations
- Ecolabel
- Legal Affairs
- Consortia / Task Forces

Anticipated change of services required over the next five years

Consultancy/

Representation

& management

Information

products

Laboratory

Legal/ training/

other services

Advisory

Product compliance Chemical safety assessment Regulatory interpretation Environmental risk assessment Assessment of data quality Data management Access to English translations of regulatory documents Supply chain communications Hazard & exposure modelling Health effects assessment Product stewardship Ecolabelling Safer alternatives assessment Consumer product safety Health & safety **Registration strategies** Access translations of regulations in users' languages Corporate strategy/strategic planning Testing strategies Data-gap analysis (QSAR) Product safety testing Workplace risk assessment (exposure) SVHC advisory services Safety of nanomaterials Chemical transport/warehousing advice Occupational hygiene Product Inspection (on-site) Registration services Dossier preparation Representation (OR, 3rd party etc) CLP notification Management (SIEF, consortium etc) GHS notification Business process outsourcing (BPO) 12% Regulatory/policy tracking Regulatory database Chemical hazard database Global news and insights Managed regulatory content (Material) safety data sheets Alternative approaches to testing Ecotoxicology Product testing Environmental fate & degradation Human health toxicology Environmental monitoring Exposure testing Physical & analytical chemistry SVHC testing Monitoring processes (on-site) Training courses/webinars Lobbying/advocacy Legal representation (as lawyers) Public relations Bespoke/in-house training Logistics Insurance 15% Emergency response call centre services 11% CPD/CES certified training 10% Emergency response 7%

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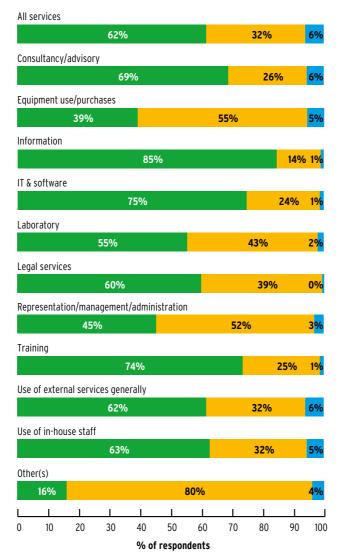
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30%		63%			7
29%		64%			7
23%		59%			7
22%		9%			9
21%		1%			8
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19%	70%				1
34%		62%			3
29%		68%			3
28%		65%			_ 7
26%	7	68%			6
22%		0%			8
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57			41%		1
53%		44			2
52%		46			2
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Increase Static Decrease

Anticipated changes in need for external services by sector to support chemicals management work over the next 12 months

48%		48%	<mark>4%</mark>
Consultancy/advisory			
52%		44%	<mark>4</mark> %
Equipment use/purchases			
26%	6	8%	6%
Information			
7	6%	2	23% 1%
IT & software			
62%		37%	1%
Laboratory			
40%		59%	1%
Legal services			
48%		51%	2% <mark></mark>
Representation/management/a	administration		
33%		63%	<mark>4</mark> %
Training			
63%		35%	<mark>2%</mark>
Use of external services generation	ally		
ose of external services genera			
48%		48%	<mark>4%</mark>
-		48%	<mark>4%</mark>
48%		48% 46%	4% 4%
48% Use of in-house staff			
48% Use of in-house staff 50%	86%		
48% Use of in-house staff 50% Other(s) 11%	86% 1 1 1	46%	<mark>4</mark> %

Anticipated changes in need for external services by sector to support chemicals management work over the next 5 years



Increase Static Decrease

Sekki says as the chemical sector continues to push towards more sustainable products with a notable focus on materials innovation, there will be an increasing necessity for emerging technologies such as AI that will help in collecting data and predicting toxicity, as well

Dieter Drohmann, CEO of the Chemservice Group, expects that environmental, social and governance (ESG) will play a more significant role for the big companies. And Maaike Bilau, senior product stewardship consultant and portfolio manager for product stewardship and sustainability at Arcadis Belgium, says customers will need more communication on product sustainability.

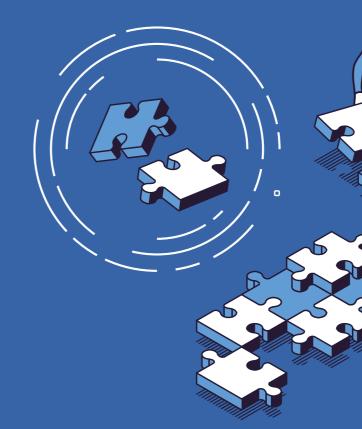
Due to increasingly complex international requirements, Zuffellato sees more and more customers outsourcing some or all of their systems' data maintenance to specialised service providers. She notes rising demand in 2024 for updating SDS, as well as help with changes to the CLP regulation.



In Europe, the Green Deal and a shift to a circular economy are dominating corporate agendas, even if many companies have slowed their initiatives as they rein in spending and adopt a tight focus on controlling costs.



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- Chemical Safety Report & SDS Authoring
- EU Cosmetics Regulation RP Services
- CPNP Notification
 PIF Preparation & Safety Assessment
- K-REACH, CSCL, MEP Order 7, TCSCA Representations

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Address: Tal 44 80331 Munich, Germany How important to your organisation is it to assess business risks associated with chemicals management in the following areas?

5% <mark>15</mark> 9	6	35%			45	%		
Threat to IF	lconcorne	over CPI						
	-	OVELCDI	200	,		24	20/	
10%	23%		29%	0		30	3%	
Ongoing co	mpliance							
3 <mark>% 11%</mark>		48%				38%		
0		and						
		and associate					37%	
11%	24%		28%	D			5170	
Handling ch	emicals of	f concern						
Handling ch	emicals of 23%	f concern	26%				41%	
9%	23%		26%				41%	
9% Disruption	23%	S	26%			18%	41%	
9%	23%		26%		4	18%	41%	
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9% Disruption 1 2% 10% Cost of sub 2% 16 Being found	23% to busines: stitution/lo %	s 10% oss of market 46% ant/enforcem	6			35%		

Bilau says keeping up with both regulatory and scientific changes will remain a challenge for service providers, both now and in the longer term, noting that compliance is the main and urgent focus and "proactive stewardship is for the happy few".

Important

Essential

Somewhat important

Regulations, in particular REACH in the EU, are becoming very demanding, says Chemsafe's Conto. "As a consequence, competent authorities are becoming very demanding. So we all need to be more effective in dossier preparation, and to some extent more scientific. Regulatory toxicology is becoming a key factor," he says.

In silico tools

Not important

Dr Cleuvers notes that the trend to avoid animal testing continues, hence service providers need "comprehensive expertise and experience" in areas such as in silico tools and QSARS, among others.

He sees customers shifting away from "normal" service provider activities towards strategic consulting, not only to ensure compliance, but also to enable market entry and marketability of chemical products.

New regulations and/or amendments to existing regulations create even more complexity. "Adding new hazard classes for instance requires that you are continuously not only up to date, but actually earlier and better informed about potential impacts for your clients," Cleuvers says. "There is growing demand for a kind of watchdog service where we monitor and evaluate any regulatory changes that might have a specific impact on an individual client's product portfolio."

Consolidation among service providers is another key challenge, and one that has been mentioned several times in past years. Some of the founders of consultancies in the early years of EU REACH are nearing retirement and will be looking to sell, says Drohmann. "I see challenges for smaller consultancies of less than ten employees since the issues are getting more complex and clients want a onestop-shop service provider," he says.

Zhou says customers would like to have a long-term partnership with their service provider, communicating across different markets and requests, such as SDSs, labels and other regulatory documents, as well as regular monitoring on pending/future legislation.

The upheaval in supply chains from Covid-19 and more recently the Russia-Ukraine conflict has also spurred many manufacturers to review their own production and procurement, seeking to become more localised.

"I feel our clients will likely be most interested this year in trying to be less reliant on importing raw materials and energy, with more focus on sourcing in Europe," says Kane, noting that the European Commission has prioritised the need to be more self-sufficient in sectors such as agriculture, including crop protection, fertilisers and seeds.

This could lead to non-EU chemical manufacturers seeking to establish or acquire European manufacturing sites with sectors such as food production, energy generation and electronics driving future demand for services, he says.

He adds that geopolitical tensions in Eastern Europe and the Middle East and Asia are driving a requirement for action in Europe and the US to stabilise markets through research and innovation.

The world of chemical compliance is constantly shifting in response to legislative, economic and geopolitical events, and keeping pace with developments is not easy. But this is creating demand for service providers able to monitor and predict regulatory changes for their clients. Whether customers have the funds to invest in this valuable expertise is another question.



There is growing demand for a kind of watchdog service where we monitor and evaluate any regulatory changes that might have a specific impact on an individual client's product portfolio.



What are the prospects for professionals working in chemicals management and control in 2024?

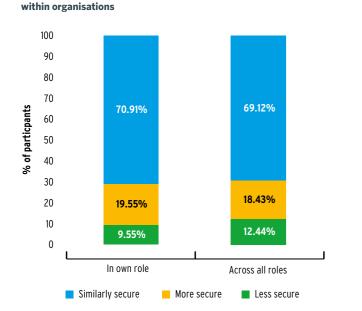
This year's Enhesa Chemicals Management and Control Survey finds an increasingly static jobs market, reflecting continued challenging economic conditions. Nevertheless, plenty of good opportunities can still be found, says Chemical Watch News & Insight's Emma Davies.

early two-thirds (63%) of respondents have told this year's Chemical Management and Control Survey that the number of chemicals management and control professionals employed by their organisation is likely to remain static over the next 12 months. The finding continues a trend from last year when 57% said they expected numbers to remain static – up from 48% in 2022 – and reflects continuing challenging economic conditions around the globe.

Nearly a third (33%) expect staffing levels to increase over the year – down from 38% last year – while just 4% expect them to fall.

The SPG survey received 565 responses in total, with 53% based in Europe, 23% in North America and 17% in Asia Pacific. The remaining 7% were from Latin America, Africa and the Middle East. The largest proportion of respondents work in regulatory affairs, followed by product safety and compliance management.

Around 57% of workers report being satisfied with their work – a finding which has remained largely consistent throughout the history of the survey.



Job security felt by respondents in their own roles and across all roles

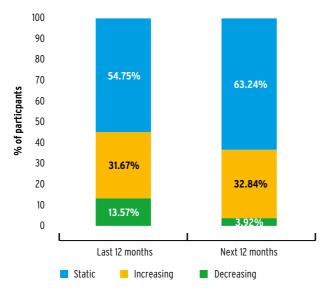
In-house need

Of the respondents, 55% estimate that more than four fifths of their organisation's work in chemicals management and control is currently performed by the in-house team. As such, more than half of respondents predict an increasing need for in-house chemicals management staff over the next five years, with 8% foreseeing a "significant" increase.

However, more than 12% of professionals surveyed said they feel less secure in their current role, compared with the same time last year. This figure has doubled since the 2023 survey, although around 70% describe job security as stable. Dieter Drohmann, managing director of Chemservice, has witnessed staff in industry regulatory affairs retire or be made redundant without being replaced. "This gap is likely to be filled with consultant hours," he says.

Meanwhile, some service providers are boosting IT provision so customers can be more self-reliant. For example, CIRS – the Chemical Inspection & Regulation Service – is developing free online inventory search and global compliance tools.

Within your employer, what is the trend in terms of number of chemicals management and control professional staff?



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How important are the following opportunities to your organisation

New product development based on compliance insights

7%	19%	44%	29%					
New bu	7% 19% 44% 29% New business opportunities based on safer products							
7%	24%	42%	27%					

Enhanced procurement, based on compliance insights

8%	23%	54%	15%
8%	23%	54%	15%

 $\label{eq:constraint} \mbox{Enhanced facility and worker safety based on strong hazard/exposure knowledge}$

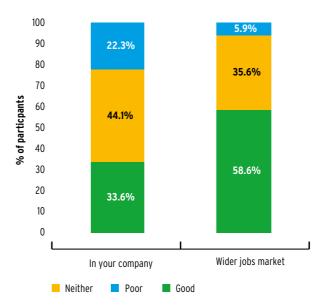
6%	20%	45%	29%
Enhance	d customer	service, based on product steward	Ishin activities

2			
6%	24%	49%	22%

Enhanced corporate strategy based on integrated chemicals management (eg sustainable development and circular economy)

8%		<mark>19%</mark>			52%	þ			21%	
	1		1	1	1		1			
0	10	20	30	40	50	60	70	80	90	100
				% of	respon	dents				
Not important		Son Son	newhat i	importar	nt	📕 Impor	tant	Ess	ential	

Opportunities to progress in a chosen career within respondent's organisation and the wider jobs market



(•



ISAM.COM – Visit Our Website Although IT tools may reduce numbers employed in some areas, three quarters of respondents predict the need for staff working on IT and software will increase over the next five years.

One respondent commented that "regulatory resourcing" is a "next big issue" for their organisation. This includes ensuring enough funding to meet the challenges of an ever-changing global regulatory landscape, including appropriate tools and processes to stay ahead, they said.

Prospects for progression and pay

A slightly higher number of respondents this year feel career progression opportunities with their current employers are "poor" (22%, up from 19%), although 33.6% describe opportunities as "good". People have a more positive view of opportunities beyond their current companies, with 58.6% considering there are "good opportunities" to progress in the wider jobs market.

Meanwhile this year's survey identified a significant increase in average salaries compared with last year for respondents working in product safety and stewardship – up from \notin 74.6k to \notin 84.5k. Average salaries have also increased for those working as compliance managers, consultants, toxicologists, regulators and EHS managers. Bucking the trend are those working as regulatory affairs managers who have seen a fall in average salary this year from \notin 77k to \notin 69k.

Looking at salary movements from a geographical perspective, those working in North America and Asia have seen the most significant increases in average pay. By contrast, Europe and Latin America both saw falls in reported average salaries. Balancing both local and global issues and regulations as a complex global enterprise is growing increasingly difficult. Such regulatory variation in and between regions poses a real challenge for companies operating across the world and often requires local expertise.

For example, CIRS is based in China but is rapidly expanding in other parts of Asia and the US. "We'd like to have some experts in the local regions," said Bryan Zhou, deputy general manager, Europe.

In general, issues are becoming more global, said Dieter Drohmann, managing director of Chemservice. He gave the example of companies needing to keep up with the proposed EU PFAS restriction, together with PFAS action elsewhere, such as in US states Minnesota and Maine. "Clients need more and more global coverage," he said.

Several other survey respondents also described the proposed EU PFAS restriction as the next "big issue" that their organisation needs to manage in relation to chemicals management and control.

In general, the list of regulatory drivers is long. It includes EU REACH, as well as several national regulations such as South Korea's K-REACH. Also on the list are risk assessments for endocrine-disrupting chemicals and nanomaterials.