

Dear PETA and concerned citizens,

Thank you for your letter of 8 May 2017 which I received together with the 7 500 postcards from concerned citizens in support of your campaign to stop testing of cosmetic ingredients on animals. We understand the importance of this issue and the time taken by citizens to write to us. We are replying to you hoping that you will help us reach out to the large number of citizens who signed the PETA postcards. I am also going to post this letter on our website, so that anyone interested can see what I have said.

As you know, REACH, the legislation which we implement, aims to ensure a high level of protection for human health and the environment from the potentially hazardous effects of chemicals. This goal can only be achieved if there is scientifically sound information on every chemical being used today to demonstrate how they affect people and the environment. Sometimes, as a last resort, that information can currently only be provided by looking at the impact of the chemical on laboratory animals.

Your campaign is looking specifically at the interface between the cosmetics legislation and REACH. In 2014, the European Commission clarified how we should interpret that interface – by requiring data on chemicals when workers are exposed – one of the principles of REACH. We will continue to follow that interpretation, which is documented in a factsheet linked below, until the European Commission instructs us otherwise.

In doing so, we however continue to do all in our power to minimise testing on animals and we promote alternative test methods at every opportunity. We are critically examining proposals from companies to test substances on animals; requiring companies to share data so as to avoid duplicate testing; supporting the development of computer modelling of data on substances which can be used as an alternative to testing; and promoting and providing advice to the registrants on the relevant alternative methods to animal testing that are – or will become – available.

I have provided some useful links below to illustrate this work. ECHA is firmly committed to continuing in this way, because it is not as yet possible to apply alternative methods and approaches in all situations, especially for establishing the long-term effects for human health and the environment. Therefore, REACH registrants and authorities may still need to rely on animal testing when these effects cannot be predicted in a scientifically valid and reliable way.

I hope that this letter reassures you of the initiatives we are taking to ensure that testing on animals is a last resort.

Yours sincerely,

**Signed**

Geert Dancet  
Executive Director

**For further information:**

European Ombudsman's decision in case 1130/2016/JAS concerning the joint statement made by the European Commission and the European Chemicals Agency on the conduct of animal tests for substances used in cosmetics:

<http://www.ombudsman.europa.eu/cases/decision.faces/en/81713/html.bookmark>

Interface between REACH and Cosmetics regulations:

[http://echa.europa.eu/documents/10162/13628/reach\\_cosmetics\\_factsheet\\_en.pdf/2fbcf6bf-cc78-4a2c-83fa-43ca87cfb314](http://echa.europa.eu/documents/10162/13628/reach_cosmetics_factsheet_en.pdf/2fbcf6bf-cc78-4a2c-83fa-43ca87cfb314)

Animal testing under REACH and ECHA's role:

<http://echa.europa.eu/web/guest/chemicals-in-our-life/animal-testing-under-reach>

[http://echa.europa.eu/documents/10162/13630/reach\\_factsheet\\_animal\\_testing\\_en.pdf](http://echa.europa.eu/documents/10162/13630/reach_factsheet_animal_testing_en.pdf)

Testing methods and alternatives:

<http://echa.europa.eu/support/testing-methods-and-alternatives>

ECHA Practical Guide "How to report *in vitro* data":

[http://echa.europa.eu/documents/10162/13655/pg\\_report\\_in\\_vitro\\_data\\_en.pdf](http://echa.europa.eu/documents/10162/13655/pg_report_in_vitro_data_en.pdf)

ECHA Practical Guide "How to report read-across and categories":

[http://echa.europa.eu/documents/10162/13655/pg\\_report\\_readacross\\_en.pdf](http://echa.europa.eu/documents/10162/13655/pg_report_readacross_en.pdf)

ECHA Practical Guide "How to avoid unnecessary testing on animals":

[http://echa.europa.eu/documents/10162/13655/pg\\_avoid\\_animal\\_testing\\_en.pdf](http://echa.europa.eu/documents/10162/13655/pg_avoid_animal_testing_en.pdf)

ECHA's reports on implementation and use of non-animal tests (REACH Article 117 (3)):

[http://echa.europa.eu/documents/10162/13639/alternatives\\_test\\_animals\\_2017\\_en.pdf](http://echa.europa.eu/documents/10162/13639/alternatives_test_animals_2017_en.pdf)

[http://echa.europa.eu/documents/10162/13639/alternatives\\_test\\_animals\\_2014\\_en.pdf](http://echa.europa.eu/documents/10162/13639/alternatives_test_animals_2014_en.pdf)

[http://echa.europa.eu/documents/10162/13639/alternatives\\_test\\_animals\\_2011\\_en.pdf](http://echa.europa.eu/documents/10162/13639/alternatives_test_animals_2011_en.pdf)