

POSITION PAPER

Planning Certainty in Uncertain Times: No REACH Revision

03 February 2026

For years, the potential revision of the REACH Regulation has been the subject of intense debate and has created considerable uncertainty. Repeated postponements of the European Commission's proposal, most recently accompanied by a critically assessed impact evaluation by the Regulatory Scrutiny Board, are themselves clear signs of this uncertainty. At the same time, the construction chemicals industry faces growing international competitive pressure, exacerbated by the strained situation in the construction sector.

With the new Construction Products Regulation, the sector is already implementing a wide range of additional regulatory requirements in the hope of a better-functioning internal market. The introduction of digital product passports, new environmental declarations and the revision of all harmonised standards are tying up considerable capacity and will occupy companies for many years. Against this background, the European Commission's renewed focus on strengthening competitiveness is both important and necessary.

The existing chemicals legislation – and the REACH Regulation in particular – has proven to be an effective and internationally recognised instrument for protecting human health and the environment. A comprehensive legislative reopening of the framework through an ordinary legislative procedure would be lengthy, complex and fraught with uncertainty. Core principles of the Regulation could be called into question, placing a disproportionate burden especially on small and medium-sized enterprises of the downstream-user industry. In addition, there is a risk of significant interactions with the ongoing reforms in construction products legislation.

Europe now needs a strong, responsible and at the same time practical chemicals framework. Targeted and achievable simplifications within the existing system are the right way forward: measures that maintain protection standards, provide planning certainty and strengthen international competitiveness. In light of the significantly changed economic and geopolitical environment – from the aftermath of the Covid pandemic to Russia's war of aggression and tensions in transatlantic relations – the German Construction Chemicals Association calls for a clear political signal:

The debate on a legislative revision of the REACH Regulation should be explicitly brought to an end as a signal of planning and investment certainty in uncertain times. Necessary simplifications should be realised within the existing legal framework, without reopening the REACH Regulation through an ordinary legislative procedure.

Deutsche Bauchemie e.V.

German Construction Chemicals Industry Association

The German Construction Chemicals Industry Association (Deutsche Bauchemie) has been representing the interests of its member companies and the German subsidiaries of foreign corporations to the professional public, politics, authorities, science, and media for 78 years. The industrial association is a sector association within the German Chemical Industry Association (VCI). In 2025, the approximately 140 member companies generated a turnover of 4.52 billion euros in Germany with around 32,000 employees.