

Perverse Effects of Modifying **REACH** Requirements

REACH's principal aim is to improve the protection of human health and the environment by identifying the intrinsic properties of chemical substances through the registration, evaluation, authorisation and restriction of chemicals.

REACH also aims to **enhance innovation** and **competitiveness** within the industries to which it is applied. Derogations from the REACH rules, would have the opposite effect and undermine innovation.

Innovation Penalised in the Biostimulant Industry

Under REACH, testing and safety requirements are determined by the tonnage produced by the manufacturer. The greater quantity of tons produced, the more tests the manufacturer must perform.

Under the application of biostimulants within the draft regulation, the Commission proposes that substances used in fertilising products must meet the requirements for REACH within the 10-100 tonnage band, even if they are produced in extremely small quantities.

The costs of an increased number of tests would make small scale commercial launches would be prohibitively expensive and therefore create barriers to innovation.

Since biostimulants are applied in much smaller quantities than most other products covered by the regulation, the sector is disproportionately affected – yet it is the sector with the **highest reinvestment in R&D**.

Unattractive Terms Could Make Suppliers Scarce

The problem is worsened by the fact that many biostimulant producers buy the substances they incorporate into their products. Since REACH has no provision for downstream customers to make REACH registrations, biostimulant producers would have to persuade suppliers to conduct more tests than they are legally required to do, raising supplier costs significantly. As a result, it would become difficult for manufacturers to source suppliers for biostimulant ingredients.

Normal REACH Requirements Suffice to Ensure Safety & Promote Innovation

Biostimulant manufacturers are committed to launching new products that are safe and healthy for the population and the environment. Normal REACH requirements are adequate to ensure safety, as demonstrated by their application today to fertilisers and co-formulants used in plant protection products.

To learn more about REACH applied to biostimulants and other related topics, view this [presentation](#).