

# Background paper – retrospective analysis

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# Challenges



- Chemicals – a complex issue (cocktail effect, effects in later generations, etc.)
- Effects of hazardous chemicals often underestimated and it takes decades to regulate them
- Multiple factors for health effects
- Paralysis by analysis?
- Who covers the costs?
- Implementation of results?

# Positive Effects



- Adjustments to reality
- Increased effectiveness
- Learning for the future
- Goals and indicators specified, quantified, clear and verifiable



# Negative Effects

- Uncertainty for businesses
- Disruption of structures in implementation, enforcement, in different countries
- Increased bureaucratic burden on authorities (no change of burden of proof possible)
- Delays implementation (e.g. RMOA for SVHCs)
- Open government – only when comments having an effect (150.000 PC on TTIP)
- It's politics, stupid



# Already in place?



- REACH review
- REFIT
- Changes in implementation

Does it deliver?





# Thank you!

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