



Timelines of opportunity: How HBM4EU can support chemicals management policy needs

KEY MESSAGES

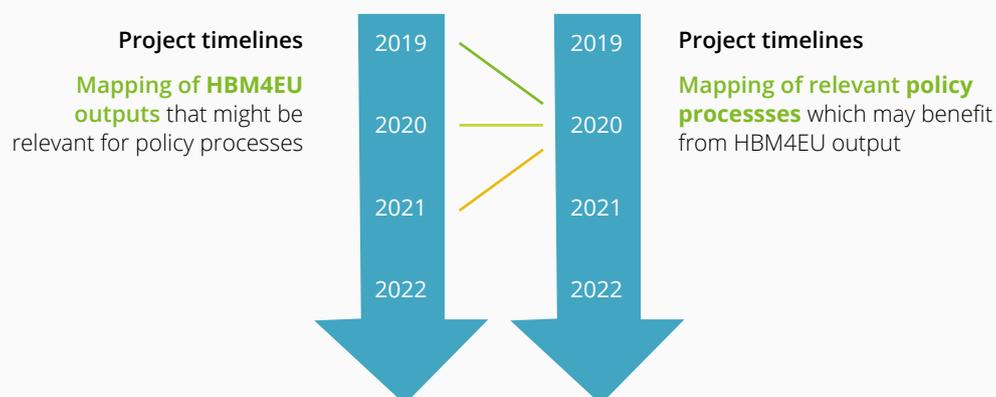
- **Science based policymaking** in support of European chemicals' legislation is a **key driver of HBM4EU**.
- New **knowledge needs to** be generated on each **HBM4EU Priority Substance Group** to be **picked up and used by risk assessors, risk managers** and other actors involved in **delivering chemical safety**.
- A strategy has been developed to identify **specific windows of opportunity for uptake of HBM4EU results** to answer the following:
 1. **What (type of) policy processes may benefit from the knowledge produced by HBM4EU?**
And (how) can these be mapped and anticipated in advance?
 2. **What (type of) output do we expect from HBM4EU and when?**
How can this be used in different public policy processes?
 3. **Is it possible and desirable to better 'align' the project timeline with the policy's agenda?**
To optimise opportunities for HBM4EU to provide input in time.

A STRATEGY FOR IDENTIFICATION OF TIMELINES OF OPPORTUNITY

By mapping planned and ongoing policy processes that may benefit from HBM evidence on the one hand, and expected timing of project outputs on the other hand, a better insight should arise into specific windows of opportunity for HBM4EU

(Figure 1). A feasibility study and a case study for the PFAS substance group is available in: '[Additional Deliverable 5.9_ Timelines of Opportunity](#)'

Figure 1: Schematic representation of AD5.9 Timelines of Opportunity





DEVELOP A STRATEGIC AND SYSTEMATIC APPROACH TO INTERFACE SCIENCE AND POLICY

This strategy is part of a response to an advice of the HBM4EU Advisory Board, that stated that the sciencepolicy interface could be made more explicit and that a more strategic and systematic approach would be needed (September 2018).

“Which relevant public policy processes may benefit from the knowledge generated, when this might be the case and how knowledge can be transferred to its users”

THE ADDED VALUE OF HBM FOR POLICY MAKING

Evidence from HBM studies can be an important piece of information for a variety of policy processes. These include **(regulatory) risk assessment** and **policy evaluation, agenda-setting** and **prioritization, awareness raising**

of the population, or **stakeholder initiatives** (e.g. by NGOs or voluntary action by companies or sectors). Specific data analysis can also inform **targeted policy interventions** for specific sectors or vulnerable groups.

TYPES OF PROJECT OUTPUT, POLICY RELEVANCE AND KEY ACTORS INVOLVED (FROM EU PERSPECTIVE)

TYPES OF OUTPUT	POLICY RELEVANCE	KEY ACTORS
 (New) HBM data, Europe-wide exposure data	Realistic exposure assessment, in context of risk assessment and health impact assessment.	Risk assessors, ECHA (RAC), EFSA and other expert committees
 Socio-demographic- (age, vulnerable groups) and geographic stratification	Input for targeted policy initiatives (regulatory or non-regulatory) Input for national, regional, social policy	ECHA, DG Environment, DG Sante, other DG's National/ reg. authorities
 HBM Guidance Values	Prioritisation	EC, EP, Council of Ministers, Member States
 Time trends	Evaluation, Prioritisation	EC, EP, Council of Ministers, Member States
 Exposure pathways analysis; determinants analysis	Input for sectoral policies	EFSA, DG Environment, DG Sante, EMA, industry and sector associations, national and regional authorities, ...
 Effect monitoring, exposure-effect associations	Input for hazard assessment, in context of RA, HIA, classification, SVHC listing, ...	Risk assessors, ECHA (RAC), EFSA and other expert committees
 Monitoring of new emerging chemicals, nontargeted screening, ...	Early warning	EC, EP, Council of Ministers, Member States

These types of output are generic and the output will be different for each substance group. Substance group specific timelines would therefore be very useful. However, this is a **very challenging and laborious task** as the precise **content and public availability of planned output are not always easy to predict**. In addition, there is often some reluctance to disclose this information without having the possibility of

a two-way communication to avoid wrong expectations and because of the right of first publication in peer-reviewed journals. Nevertheless, it is important to consider how this information can be shared with (specific categories) of “external actors” such as the European Commission or Commission Services (e.g. ECHA and EFSA), as they are expected to use it in their work.

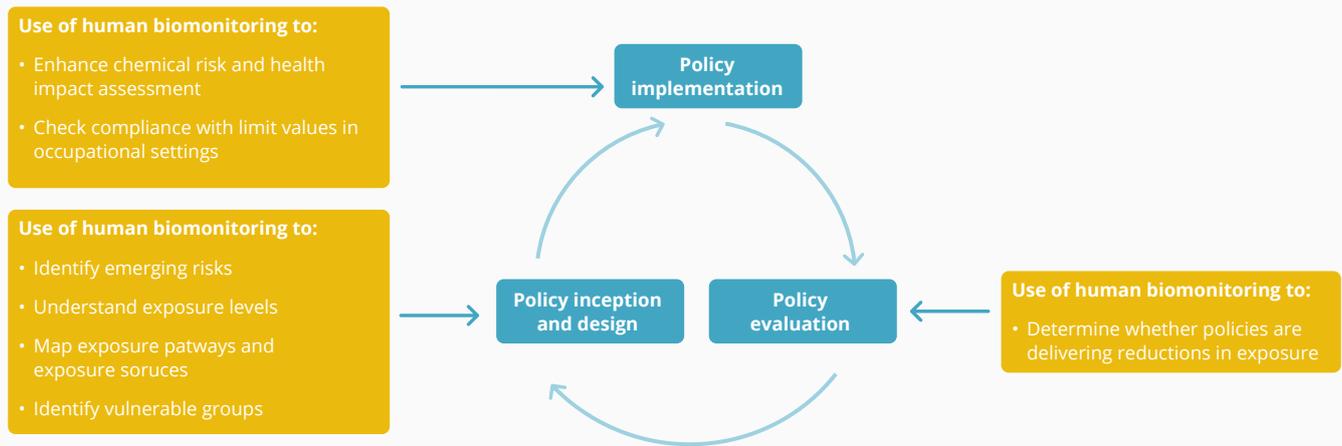


MAPPING OF RELEVANT POLICY PROCESSES

In the mapping of relevant policy processes, various types of processes should be considered: regulatory processes, multilateral agreements, planned policy evaluations, opportunities for agenda setting, strategic policy development at the political level or action plans for exposure reduction, and

health promotion. This diversity of relevant policy processes relates to different phases of the policy cycle (Figure 2), but also to the roles of different actors and policy levels (EU, international, national, local).

Figure 2: The added value of HBM in the policy cycle



In some of these areas, planned and ongoing processes can be properly mapped routinely. This includes the regulatory processes in the context of REACH (for which a specific tool is available, i.e. **PACT - ECHA's Public Activities and Communication Tool**) and certain other 'candidate lists' or 'watch lists', e.g. multilateral agreements and EU directives such as the Water Framework Directive and Drinking Water Directive.

Other types of processes need a more in-depth document search, such as the working programs of the European Commission and EFSA, or meeting reports of the EU Council of Ministers for environment and health. Other processes are much more difficult to map in advance and can only be anticipated by broad document searches and consultation of key actors in the field.

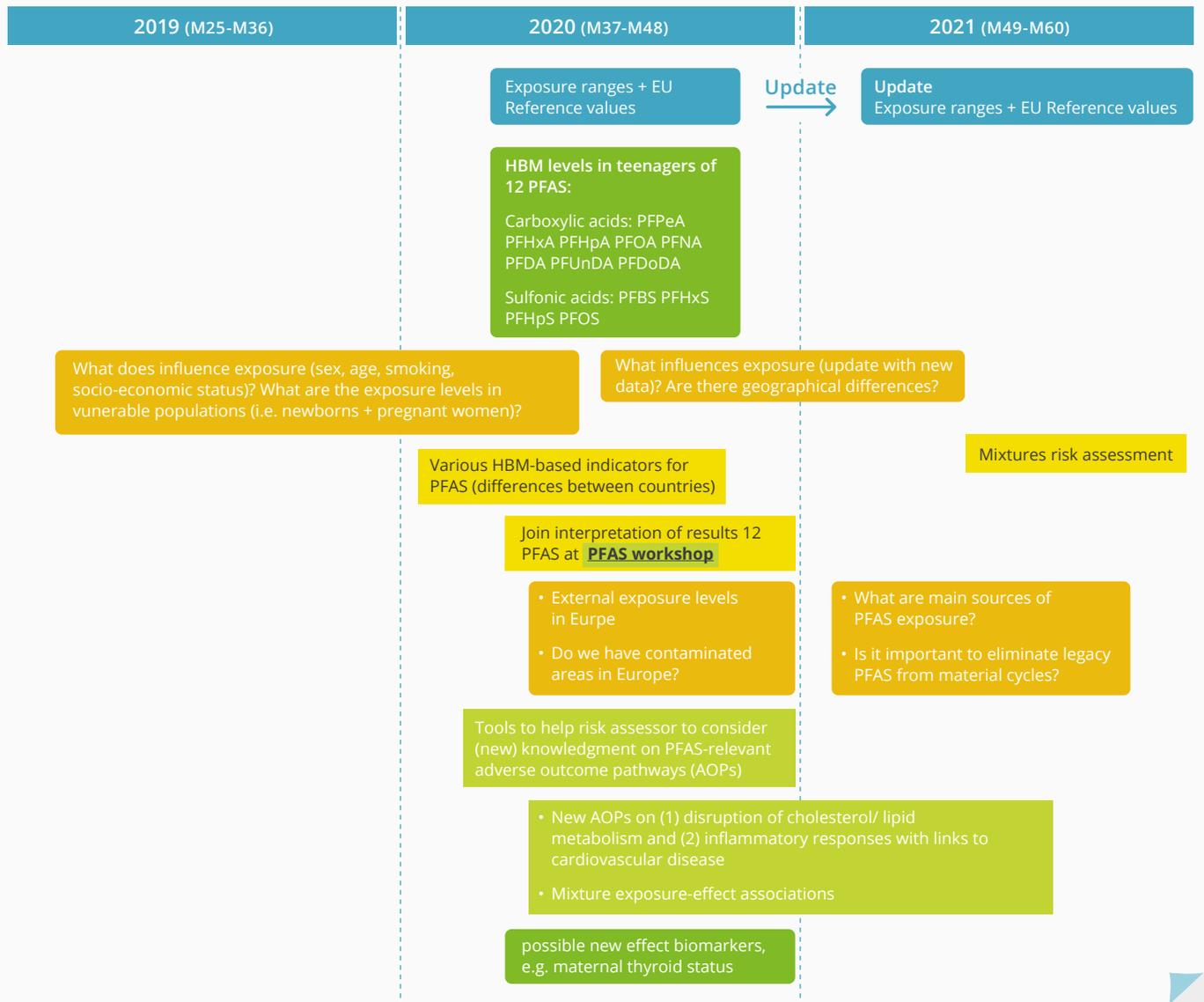




PFAS TEST CASE (2019)

The strategy has been performed for the Per-/Polyfluorinated compounds (PFAS) as a first test case. The following pages contain some results, for illustrative purposes only.

PFAS TESTCASE – HBM4EU TIMELINE PROTOTYPE (Last updated March 2020)





PFAS TESTCASE POLICY OPPORTUNITIES

Policy opportunities have been identified using different methods. Formal registries and lists for regulatory processes and multilateral agreements have been screened by EEA and RPA Consultants in the context of a **legislative mapping** (performed for all HBM4EU priority substance(s) and groups). The result of this screening was forwarded to members of the 'HBM4EU - EU Policy Board' for consultation and is available in **the substance specific** webpages. In addition, the University of Antwerp organised a more **in depth online and document search** and **consulted** several actors having a good overview on policy developments with regard to PFAS directly (including the HBM4EU Chemical Group Leader for PFAS).

An **overview of policy processes for which HBM4EU provided input** is available on the website.

Some examples of policy opportunities that were identified (end of 2019) are listed below:

PFHxA restriction proposal, by Germany

- consultation & RAC opinion in 2020

PFAS group restriction intention, by NL, G, ECHA, EC

- dossier preparation

EFSA draft scientific opinion on PFAS in food

- public consultation spring 2020

PFHxS proposed for listing under Stockholm Convention

- decision to be taken by COP in 2021

Call for EU action plan for PFAS, by DK, LUX, NO, SE

- political agenda setting and policy development

State of Environment reporting, in Europe and member states

- enrich the use of HBM to explain human exposure to chemicals

MAPPING OF LEGISLATIVE STATUS FOR ALL PRIORITY SUBSTANCE GROUPS

The screening of the legislative status is available for all priority substance groups in the substance pages on the HBM4EU website. A more in-depth search, consultation and development of a project timeline is currently ongoing for

the bisphenols. Non-substance specific opportunities are being tracked by EEA and discussed at the HBM4EU Management Board.

MAPPING OF LEGISLATIVE STATUS FOR ALL PRIORITY SUBSTANCE GROUPS

National authorities and stakeholders are very important stakeholders for HBM4EU and HBM4EU could serve as an excellent forum for national authorities to exchange good practices and experiences. However, for the mapping of

future opportunities, the national but also the regional/local level have not been considered so far. Opportunities at these policy levels can potentially be identified through a survey of the HBM4EU National Hubs.

SOME CONCLUSIONS

- Several **concrete windows of opportunity** could be identified for the PFASs test case.
- Well-documented policy processes in the chemicals domain can be anticipated by keeping track of formal registries, watch lists or working programs (e.g. regulatory processes under REACH, EFSA's working program), but in most cases **only one (or two) years ahead**.
- Various other opportunities could only be identified on the basis of a more in-depth document search and especially by **consulting key actors** in the field (often informal information).
- From this perspective, the **HBM4EU network** is a very valuable source of up-to-date information on policy developments.





OPEN QUESTIONS

- For both the project timeline and the policy timelines, **regular updates are needed**, but this is a labour intensive exercise. An **online platform/format** that can be managed by the whole consortium and potentially also the EU Policy Board could be an option to explore, to distribute the workload and to make optimal use of the expertise available within the project's network.
- An extended role (and resources) for the **Chemical Group Leaders** would be good (e.g. in the successor of HBM4EU), to coordinate the substance group specific mapping and (especially) for the uptake and **valorisation of identified opportunities**.
- Mapping opportunities is only a first step. **Seizing opportunities** requires a more active investment, ideally in coproduction between the researchers and policy makers involved. Scientific data very often don't speak for themselves. HBM4EU (and its successor) are well-suited for a dialogue and sustained cooperation between science and policy.

SCIENCE-POLICY DIALOGUE ON PFAS RESULTS

The mapping of policy opportunities helped to identify important policy processes that might benefit from the evidence that is being produced by HBM4EU and to further match the policy and project timelines. Following this mapping exercise, a science-policy dialogue on HBM4EU results on PFAS has been launched to further explore how the results can be

of use for policy making. **A workshop will be organised in April 2021** with HBM4EU project partners, regulatory scientists from member states, European agencies and the European Commission to facilitate the discussion on uptake of HBM data into policy and will support the intention of a restriction of PFAS as a group and other relevant policy processes.

READ MORE

[Additional Deliverable 5.9_Timelines of Opportunity](#)
(for the strategy and PFAS testcase)