Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Federal Department of Home Affairs FDHA
Federal Office of Public Health FOPH
Federal Food Safety and Veterinary Office FSVO

Federal Department of the Environment, Transport, Energy and Communications DETEC
Federal Office for the Environment FOEN

Federal Department of Economic Affairs, Education and Research EAER
Federal Office for Agriculture FOAG
State Secretariat for Economic Affairs SECO

Strategy document

Strategy for Chemical Safety

for the interdepartmental implementation of chemicals legislation 2023 - 2027

Version 29.06.2023

Contents

Foreword

The first interdepartmental Strategy for Chemical Safety was devised in 2016 based on a corresponding mandate from the Federal Council, and entered into effect in 2017. It was intended to remain in force for four to five years. In the meantime, the EU has continued to pursue its own chemicals policy, not least as part of the European Green Deal. In view of this, a revision of this initial strategy had become necessary, to align it to new developments and parameters.

The present revised strategy deepens the common understanding among the federal agencies involved in the implementation of chemicals legislation at the federal level in regard to chemical safety, and strengthens collaboration. It should also help build up trust externally, by clearly demonstrating the objectives to be achieved to business and industry, the population, other federal agencies and the political world.

The strategy has been prepared by the federal agencies involved in the federal implementation of chemicals legislation (FOPH, FSVO, FOEN, FOAG and SECO), and will be jointly implemented.

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1. Introduction

1.1 Importance and risks of chemicals

Chemicals are part of our everyday lives. They are contained inter alia in paints, medicinal products, cleaning agents, fertilisers and pesticides, but also in furniture, smartphones, heat pumps and many other objects in daily use. Be it in electric vehicles, photovoltaic systems, energy-efficient houses or dirt-repellent surfaces, chemical products and technologies enable innovations in all walks of life.

Some 100 000 chemical substances are produced worldwide today. Their key importance is also confirmed by their global annual production volumes, which have multiplied in the last hundred years from one million tonnes in 1930 to more than 400 million tonnes today. The OECD[1] continues to forecast strong growth.[2] The benefits of chemicals are manifold, but they also entail risks, for the environment and for human health.

Chemicals with hazardous properties can, in cases of corresponding exposure, do serious damage to the environment and harm to people's health. Among such hazardous chemicals, some are the subject of particular concern because they are carcinogenic, because they harm the airways, the hormone system, the reproductive system or the cardiovascular system or because they compromise the immune system.[3],[4],[5] Persistent chemicals remain in the environment for long periods of time, where they can be enriched via food chains and do chronic damage to all living organisms. Chemicals are also a contributory cause of the loss of biodiversity and the destruction of ecosystems.[6]

According to Accident Insurance Act (UVG) statistics, some 17 000 cases were recorded annually between 2016 and 2019 of occupational illnesses and occupational accidents with insurance ramifications caused by substances (not including asbestos) in Switzerland.[7]

More than 10 000 domestic accidents a year involving chemical products are documented by Tox Info Suisse.[8]

If environmental damage caused by chemicals is not promptly identified and prevented, this can result in substantial remediation costs, such as the CHF 660 million which was required to clean up the Kölliken former landfill site.[9]

It is vitally important, then, to identify the properties of chemicals, to compare these with the chemicals' use and the associated exposures and thus to assess the resulting risks. To avoid unacceptable levels of such risks, a risk-based regulation of chemicals is crucial to protecting both health and the environment in Switzerland.

1 All the abbreviations used in the Strategy are described in more detail in the List of Abbreviations.

2 See OECD Environmental Outlook to 2050; www.oecd.org/env/indicators-modelling-outlooks/oecd-environmental-outlook-1999155x.htm

3 Information from the European Environment Agency: www.eea.europa.eu/publications/emerging-chemical-risks-in-europe/emerging-chemical-risks-in-europe.

4 Linking pollution and infectious disease, C&en, 2019; Environmental toxins impair immune system over multiple generations Science Daily, 2 October 2019. www.sciencedaily.com/releases/2019/10/191002144257.htm

5 Rockström, J. et al., Planetary Boundaries: Exploring the Safe Operating Space for Humanity. Ecology and Society, 2009.

6 www.bafu.admin.ch/bafu/en/home/topics/chemicals/in-brief.html; examples cited include negative impacts on insects (especially bees), aquatic ecosystems and bird populations.

7 UVG 2022 accident statistics (in German); www.eea.europa.eu/publications/emerging-chemical-risks-in-europe/emerging-chemical-risks-in-europe

8 www.toxinfo.ch/jahresberichte_en

9 www.smdk.ch

1.2 Legal framework

Protection objectives

The Federal Constitution empowers the Confederation to protect health and the environment against damage from hazardous chemicals and to enact corresponding chemical regulations.[10] From the Constitution can be derived the following protection objectives:

- the protection of human health
- the safety of professional users of chemicals
- the protection of the environment
- the protection of agricultural crops.

These protection objectives are the subject of various federal acts that contain chemical-related provisions. These federal acts include in particular the Chemicals Act (ChemA), the Environmental Protection Act (EPA), the Water Protection Act (WPA), the Foodstuffs Act (FoodA) and the Agriculture Act (AgricA).

Chemicals legislation

Swiss chemicals legislation comprises, at the ordinance level, eight Federal Council ordinances that regulate the use of chemicals, and are primarily based on the above-mentioned Acts.

The Chemicals Ordinance (ChemO) regulates the basic requirements for handling chemicals. Prohibitions of and restrictions on certain specific chemicals or groups of chemicals and special regulations for handling certain groups of chemicals (such as de-icing agents, fertilisers, refrigerants and plant protection products) and regulated in the Ordinance on Chemical Risk Reduction (ORRChem). Biocidal products and plant protection products are subject to authorisation, the requirements for which are specified in the Ordinance on Biocidal Products (OBP) and the Plant Protection Products Ordinance (PlantPPO). The further Federal Council ordinances are the Ordinance on Good Laboratory Practice (OGLP), the Chemical Fees Ordinance (ChemFO) and the PIC Ordinance (ChemPICO), which formulates Switzerland's obligations as a signatory to the Rotterdam Convention and, among other things, specifies a notification procedure and the reporting requirements for the export of certain hazardous chemicals.

The Pollutant Release and Transfer Register Ordinance (PRTRO) is intended to ensure public access to information on the release of pollutants and the transfer of waste and pollutants in waste water by means of a register thereon.

In addition to the above, various departmental ordinances specify special training requirements for persons handling and using certain chemicals.

Acts (Parliament)	ChemA	EPA	WPA, FoodA, AgricA, …	
Ordinances (Swiss Federal Council)	ChemO	OBP	PlantPPO	ORRChem
	ChemPICO	OGLP	ChemFO	PRTRO

Figure 1: Federal acts and Federal Council ordinances in chemicals legislation

10 Art. 74, 104 Abs. 3 Bst. d, 110 Abs. 1 Bst. a, 118 Abs. 2 Bst. a. Bundesverfassung (BV; SR 101), www.fedlex.admin.ch/eli/cc/1999/404/de

Chemicals within the scope of chemicals legislation refer to chemical substances and their mixtures (preparations), including biocidal products (BPs) for use against harmful organisms and plant protection products (PPPs) for use against diseases and pests as well as weeds in crops.[11] Micro- or macro-organisms that are incorporated in PPPs and BPs fall within the scope of chemicals legislation and are therefore also subject to the present strategy.

The provisions of chemicals legislation are directed towards manufacturers, importers and dealers, towards professional and private users (agriculture, commerce, non-professional users etc.) of chemicals as well as towards manufacturers.[12]

Chemicals that are considered to be foodstuffs, cosmetics, medicines, remedies, feedstuffs, weapons, ammunition or waste are largely or completely exempt from chemicals legislation. These chemicals are subject to their own specific legislation. There are also further areas with provisions on chemicals which are likewise not subject to chemicals legislation but which make their own key contribution to integrated chemicals risk management. These include the regulatory areas of soil protection, water protection, air pollution control, dangerous goods transport, accident prevention, construction products and residues in foodstuffs.

Implementing organisation

The implementation duties for the application and enforcement of the provisions of chemicals legislation are divided between the Confederation and the cantons.[13]

- The Confederation is responsible in particular for the verification of the manufacturers' declared classifications of substances and preparations, for the risk assessment of selected substances, for the examination of notifications and applications for the authorisation of substances, BPs and PPPs and their confirmation or authorisation, for the notification procedure for hazardous substances and preparations and for international collaboration.
- The cantons are responsible for the market surveillance. The cantons perform random sample checks to monitor substances, preparations and articles as well as PPPs and BPs which are present on the market, to ascertain their conformity with chemicals legislation and compliance with the corresponding handling requirements.

Five federal agencies are essentially involved in the federal enforcement of chemicals legislation:

the Federal Office of Public Health (FOPH), the Federal Office for Agriculture (FOAG), the Federal Food Safety and Veterinary Office (FSVO), the Federal Office for the Environment (FOEN) and the State Secretariat for Economic Affairs (SECO), together with the Notification Authority for Chemicals (NAChem) and the Plant Protection Product Authorisation Body (PPP AB). Further details of the organisation for the federal enforcement of chemicals legislation will be found in Annex II.

11 In other contexts the term 'chemicals' sometimes refers only to chemical substances and mixtures.

12 Articles include such items as floor coverings and textiles.

13 See ChemA Chapter 5: Enforcement, Art. 31 ff. www.fedlex.admin.ch/eli/cc/2004/724/en#chap_5

1.2 International context

Switzerland has ratified inter alia the following UN conventions in the field of chemical safety and incorporated them into its legal system:

- the Stockholm Convention on Persistent Organic Pollutants (the POP Convention)
- the Rotterdam Convention on the Prior Informed Consent Procedure for certain hazardous chemicals and pesticides in international trade (the PIC Convention),
- the Vienna Convention and the Montreal Protocol on the protection of the ozone layer
- the Minamata Convention on the protection of mankind and the environment from the negative effects of mercury (the Mercury Convention),
- the Aarhus Convention of the United Nations Economic Commission for Europe (UN ECE) on the Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters and the PRTR Protocol on Pollutant Release and Transfer Registers.

Switzerland further supports various UN resolutions that call for the worldwide adoption of the Globally Harmonized System (GHS) for the classification and labelling of chemicals, as well as the careful management of chemicals (including the Strategic Approach to International Chemicals Management (SAICM)[14] and Agenda 2030[15]). As Switzerland is a member of the Organisation for Economic Co-operation and Development (OECD), the OECD Council's decisions are also binding for Switzerland.

In view of the close economic ties between Switzerland and the European Union (EU), Swiss chemicals legislation has been harmonised with the corresponding EU legislation (by "autonomous adaptation") in certain areas. This is intended to avoid technical barriers to trade, and to ensure high protection levels for health and the environment in Switzerland. The EU is presently further developing its own chemicals policy, not least as part of its European Green Deal, and is currently revising its CLP and REACH regulations.

In the context of the Swiss/EU bilateral agreement on mutual recognition in relation to conformity assessment (MRA)[16], Switzerland committed to adopt equivalent provisions to EU legislation for the authorisation of BPs and for the ensurance of good laboratory practice (GLP). In return, the parties in these legal fields enjoy simplified reciprocal market access. At the same time, Switzerland is also involved in the preparation of Community regulatory decisions.

14 See Glossary.

15 2030 Agenda for Sustainable Development, www.eda.admin.ch/agenda2030

16 Agreement between Switzerland and the European Community on mutual recognition in relation to conformity assessment, (in German), www.fedlex.admin.ch/eli/cc/2002/276/de

2. Strategy for chemical safety

2.1 Overview

The present strategy focuses on those aspects of chemical safety in Switzerland which fall under the regulatory area of chemicals legislation. It is conceived as an interdepartmental strategy for the FOEN, FOPH, FSVO, FOAG and SECO federal agencies involved in the federal implementation of chemicals legislation, and thus also serves as a basis for any sectorial strategies of these federal agencies in the chemical safety field.

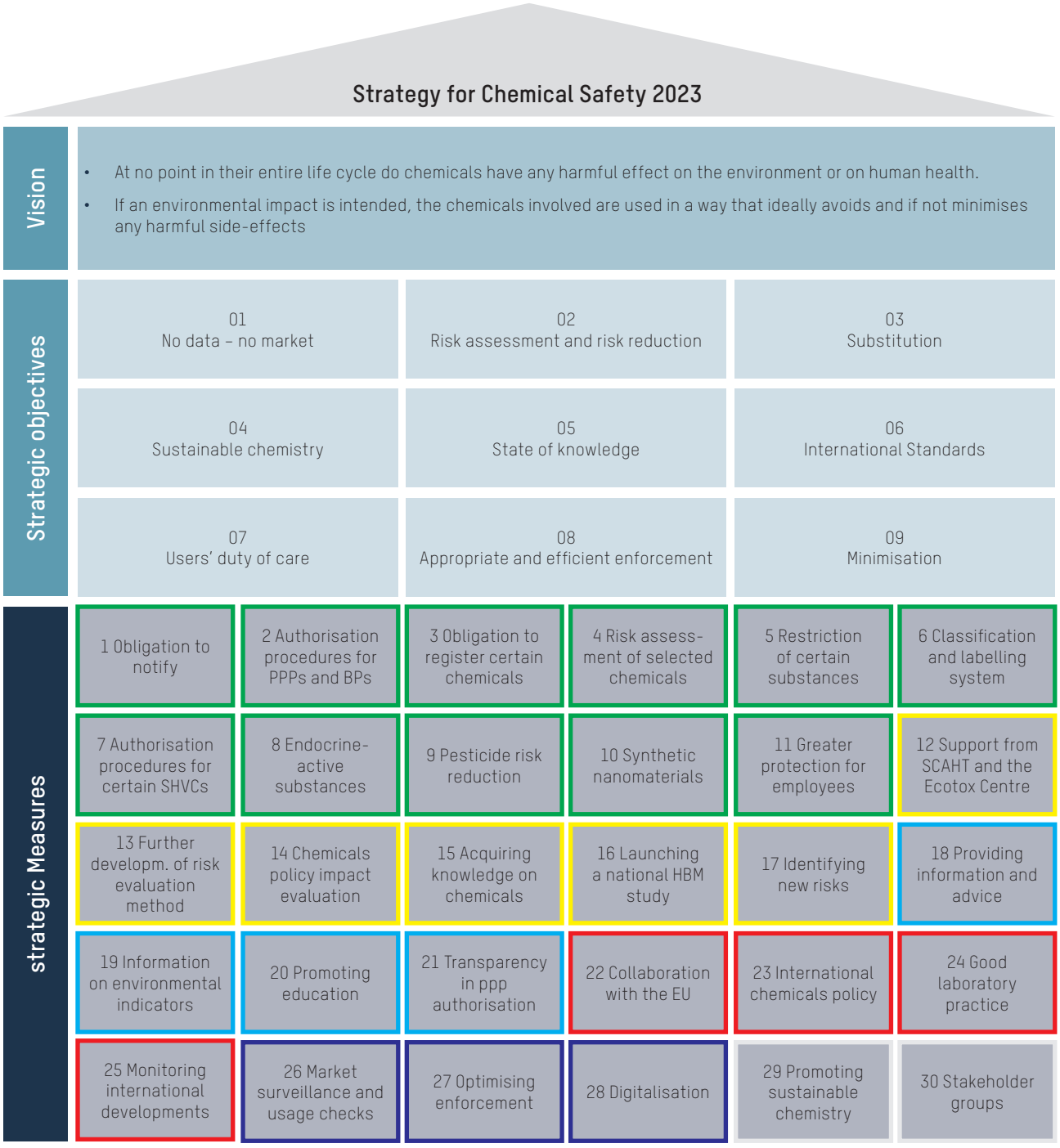

Figure 2: Strategy for Chemical Safety 2023-2027

2.2 Vision

The vision of chemical safety

- At no point in their entire life cycle[17] do chemicals have any harmful effect on the environment or on human health.
- If an environmental impact is intended[18], the chemicals involved are used in a way that ideally avoids and if not minimises any harmful side-effects.

17 Entire life cycle means that the effects of chemicals are to be taken into account from the extraction of their raw materials through their production, further processing, storage and transport and up to their use and disposal in or outside Switzerland.

18 The "no harmful side-effects" aspiration relates to chemicals that are intended to achieve a change in the environment such as pesticides, whose intended environmental impact is that the pests are eliminated. An impact on health is always considered a side-effect, as chemicals never target health.

2.3. Strategic objectives

The strategic objectives substantiate the vision and demonstrate what the federal agencies involved wish to achieve by 2027 in chemical safety terms. They also serve as a yardstick for measuring the success of the federal agencies' activities.

No.	Title	Objective
01	**No data – no market**	The persons responsible (particularly manufacturers and distributors) have the requisite data at their disposal for all chemicals that are intended to be placed on the market, in order to assess their risks to the environment and human health and to be able to provide the information required for their safe use.
02	**Risk assessment and risk reduction**	Chemicals are marketed only if their assessment demonstrates that no unacceptable[18] risks to human health and the environment result from their intended use. If necessary, the competent authorities shall take measures to reduce the risks arising from a chemical.
03	**Substitution**	Chemicals with risks to health or the environment are replaced by lower-risk alternatives.
04	**Sustainable chemistry**	The fundamental principles of sustainable chemistry[19] are respected in the manufacture, use and disposal of products as well as in the development of new processes and products.
05	**State of knowledge**	Tests for the properties of chemicals and the assessment of their risks to health and to the environment are based on scientifically sound methods and strategies which also pay due regard to the 3R Principles. Switzerland plays an active role internationally in order to further develop the relevant state of knowledge and continually adapts its chemicals legislation to the same.
06	**International standards**	The international standards for the careful and sustainable handling of chemicals are developed by participating in particular in the United Nations Environmental Programme (UNEP), in the World Health Organization (WHO), in the Food and Agriculture Organization (FAO), in the International Labour Organization (ILO) and in the OECD, with due and full regard to Switzerland's particular needs. Switzerland is committed to the worldwide implementation of such standards, also in view of the 2030 sustainability objectives which the United Nations has defined[20].
07	**Users' duty of care**	Professional and private users of chemicals pay due and full regard to their duty of care in all their chemical handling activities. They pay due and full regard to all product information when procuring such chemicals; and they use them and dispose of them with all due and proper care and in such a way that no risk is posed to people, animals or the environment.
08	**Appropriate and efficient enforcement**	The federal and cantonal authorities perform their duties and tasks professionally, efficiently and with maximum transparency. In enforcing their chemical legislation, they strive to ensure that manufacturers, importers, dealers and users fulfil all their chemical handling obligations.
09	**Minimisation**	Chemicals are produced and used in such a way that the corresponding exposure to them of the population and of the employees using them and their environmental emissions are kept to a minimum.

Table 1: Strategic objectives

19 See Glossary.

20 2030 Agenda for Sustainable Development, www.eda.admin.ch/agenda2030

2.4. Strategic measures

The strategic measures are those activities through which the federal agencies involved wish to achieve the strategic objectives set in the medium term. Strategic measures are those that are of crucial importance to achieving such objectives.[21]

The strategic measures for the 2023-2027 timeline are listed in the table below. (Some such measures have already been initiated.)

No.	Short title	Strategic measure	Objectives	Federal agencies involved
Notification, authorisation and registration obligations and risk assessment, management and reduction				
1	Obligation to notify for certain chemicals	Placing certain chemical substances on the market requires notification.[22] The federal agencies will evaluate the documentation submitted, especially in terms of any health or environmental risks. The agencies responsible will then rule on the notification and impose any risk reduction measures required.	01 No data – no market 02 Risk assessment and risk reduction 08 Appropriate and efficient enforcement	FOEN, FOPH, SECO, NAChem
2	Authorisation procedures for PPPs and BPs	Placing PPPs and BPs on the market requires an authorisation. The federal agencies will evaluate the authorisation application submitted, especially in terms of any health or environmental risks and in terms of the efficacy of the PPP or BP proposed. The agencies responsible will then rule on whether to award such an authorisation and impose any risk reduction measures required. For PPPs and BPs which contain an active substance to be replaced (substitution candidates), the procedures for comparative evaluation[23] are used. Authorisation decisions are periodically reviewed.	01 No data – no market 02 Risk assessment and risk reduction 03 Substitution 08 Appropriate and efficient enforcement	FOEN, FOPH, SECO, FSVO, FOAG, NAChem
3	Obligation to register certain chemicals	Once they have been placed on the market, any hazardous substances and preparations must be entered into the National Product Register.[24] This Register is used in particular by Tox Info Suisse, the advisory service for emergencies involving toxic substances. The federal agencies will make the non-confidential data provided accessible to the public.	02 Risk assessment and risk reduction 08 Appropriate and efficient enforcement	NAChem, FOPH, FOEN, SECO, FSVO
4	Risk assessment of selected chemicals	The in-depth risk assessment of selected chemical substances with a high risk potential is conducted with due regard to or in collaboration with the international programmes of the WHO, UNEP, the OECD, the EU etc.	02 Risk assessment and risk reduction 06 International standards	FOPH, FOEN, FSVO

21 These measures generally tie up significant resources and last for several years.

22 Pursuant to Art. 9 in connection with Art. 4 of ChemA, www.fedlex.admin.ch/eli/cc/2004/724/en

23 See Glossary.

24 In accordance with Art. 18 of ChemA, www.fedlex.admin.ch/eli/cc/2004/724/en#art_18

No.	Short title	Strategic measure	Objectives	Federal agencies involved
5	Restriction of certain substances	The Swiss Confederation will consider restrictions on certain chemical substances and will adopt these if risks are identified, e.g. through its autonomous implementation of EU regulations and its implementation of international conventions.	02 Risk assessment and risk reduction 06 International standards	FOPH, FOEN, SECO, FSVO, FOAG
6	Classification and labelling system	The classification and labelling of chemicals are based on the present provisions of the EU's CLP regulations.	02 Risk assessment and risk reduction 06 International standards	FOPH, FOEN, SECO, FSVO, NAChem
7	Authorisation procedures for certain SHVCs	New chemical substances of very high concern (SVHCs) will, as is the case with the EU's authorisation procedures, continue to be subject in Switzerland to a general prohibition with exceptional authorisations for indispensable applications. This will help promote and encourage their substitution with lower-risk alternatives.	02 Risk assessment and risk reduction 03 Substitution 04 Sustainable chemistry	FOEN, FOPH, SECO, NAChem
8	Endocrine-active substances	The "Endocrine-Active Substances" interdepartmental coordination group (EAS ICG) ensures that the corresponding activities by the federal agencies are duly coordinated.	02 Risk assessment and risk reduction 03 Substitution 05 State of knowledge 06 International standards 07 Users' duty of care	FOEN, FOPH, FSVO, SECO, FOAG, Swissmedic
9	Pesticide risk reduction	The activities specified in the Federal Council's action plan to reduce risk and sustainably utilise PPPs and the Federal Act on Reducing Risk through the Use of Pesticides[25] (PPPs and BPs) are pursued.	All	FOAG, FSVO, FOEN, SECO, FOPH
10	Synthetic nanomaterials	The definition of and information requirements for synthetic nanomaterials will be aligned to EU provisions.	All	FOEN, FOPH, FSVO, SECO, FOAG, NAChem
11	Greater protection for employees using chemicals	The Confederation will flesh out the duty of care of employers to protect their employees' health, and will support the cantonal labour inspectorates in the chemicals field.	07 Users' duty of care 08 Appropriate and efficient enforcement	SECO

25 www.fedlex.admin.ch/eli/oc/2022/263/de (in German)

No.	Short title	Strategic measure	Objectives	Federal agencies involved
Promoting research				
12	Support from SCAHT and the Ecotox Centre	The Confederation's strategic monitoring group for the Swiss Centre for Applied Human Toxicology (SCAHT) and the advisory group for the Ecotox Centre help ensure that both centres support the federal agencies involved in implementing the chemicals strategy.	02 Risk assessment and risk reduction 05 State of knowledge 06 International standards	FOEN, FOPH, SECO, FSVO, FOAG, Swissmedic
13	Further development of risk evaluation methodologies	Harmonised alternative testing methods (replacing animal testing) and new assessment approaches are being developed for chemical risk evaluations. This in being done in particular collaboration with SCAHT, the Ecotox Centre, Agroscope and the 3R Competence Centre, and also with the OECD, the European Union Reference Laboratory for Alternatives to Animal Testing (EURL-ECVAM), the European Chemicals Agency (ECHA) and the European Food Safety Authority (EFSA).	02 Risk assessment and risk reduction 05 State of knowledge 06 International standards	FOPH, FOEN, FSVO, SECO, FOAG
14	Chemicals policy impact evaluation	The federal agencies involved will identify and describe indicators enabling estimates to be made of the impact of the Swiss chemicals policy on the environment and health. Ongoing activities and the initiatives of the WHO, UNEP, the OECD and the EU will be supported by Swiss projects and activities (see 16-17).	02 Risk assessment and risk reduction 05 State of knowledge 06 International standards	FOEN, FOPH, SECO, FSVO, FOAG
15	Acquiring knowledge on chemicals as a cause of diseases	Knowledge about the connections between certain diseases and exposure to chemicals will be deepened, particularly by supporting the ongoing work and initiatives of the EU, the WHO and the ILO (see 14 and 16).	02 Risk assessment and risk reduction 05 State of knowledge	FOPH, SECO, FSVO
16	Launching a national HBM study	To study connections between stressors (such as chemical pollution, nutrient deficiency or noise) and the occurrence of diseases, a national human biomonitoring (HBM) study will be launched that puts a particular focus on the collection of health data and human biological samples. Parts of the project will feed into the EU's Partnership for the Assessment of Risks from Chemicals (PARC) research project, which Switzerland also supports.	02 Risk assessment and risk reduction 05 State of knowledge	FOPH, FSVO, SECO
17	Identifying new risks	The federal agencies will identify and assess previously unknown chemical-related risks to the environment and health (e.g. via expert hearings, systematic screenings of scientific literature, leads from other countries and findings from their own observations).	02 Risk assessment and risk reduction 05 State of knowledge 06 International standards	FOPH, FOEN, SECO, FSVO, FOAG

No.	Short title	Strategic measure	Objectives	Federal agencies involved
Information, education and transparency				
18	Providing information and advice	Die Bundesstellen informieren und beraten insbesondere Herstellerinnen, nachgeschaltete Verwenderinnen und die breite Öffentlichkeit über den sicheren Umgang mit Chemikalien. Sie fördern die Gesundheitskompetenz und leisten einen Beitrag zur Reduktion von nichtübertragbaren Krankheiten. Sie unterstützen auch die Vollzugsbehörden der Kantone.	Z1 Keine Daten – Kein Markt Z2 Risikobeurteilung und Risikoreduktion Z7 Sorgfaltspflicht der Verwenderinnen und Verwender Z8 Sachgerechter und effizienter Vollzug Z9 Minimierungsgebot	ASChem, BAG, BAFU, SECO, BLV, BLW
19	Information on environmental indicators	Die Bundesstellen informieren die Öffentlichkeit über die Emissionen von Schadstoffen in Luft, Wasser und Boden sowie über Abfalltransfers.	Z6 Internationale Standards Z7 Sorgfaltspflicht der Verwenderinnen und Verwender Z8 Sachgerechter und effizienter Vollzug Z9 Minimierungsgebot	BAFU
20	Promoting education	Die Aspekte der Chemikaliensicherheit und der nachhaltigen Verwendung werden in der Schulbildung, der beruflichen Grundbildung, der höheren Berufsbildung und der beruflichen Weiterbildung gefördert, insbesondere durch: • Festlegung der Anforderungen zum Erlangen von Fachbewilligungen für die Verwendung und von Sachkenntnis für die Abgabe bestimmter Chemikalien. • Unterstützung der Lehrpersonen mit Unterrichtsmaterialien/-modulen zur Chemikaliensicherheit. • Prüfung der Pläne, Wegleitungen und Erlasse für die Berufsbildung.	Z2 Risikobeurteilung und Risikoreduktion Z4 Nachhaltige Chemie Z7 Sorgfaltspflicht der Verwenderinnen und Verwender Z9 Minimierungsgebot	BAFU, BAG, SECO, BLV, BLW

No.	Short title	Strategic measure	Objectives	Federal agencies involved
21	Transparency in plant protection product authorisation procedures	A roadmap will be used to enhance the transparency in the authorisation procedures for plant protection products.	01 No data – no market 02 Risk assessment and risk reduction 03 Substitution 06 International standards 09 Minimisation	FOEN, FSVO, FOAG, SECO
International collaboration				
22	Collaboration with the EU	The federal agencies will perform the duties and tasks deriving from the existing MRAs in the BP and GLP fields. They will also seek to continue their technical collaborations (in specialist bodies and similar) with the European Commission, the ECHA and the EFSA.	02 Risk assessment and risk reduction 05 State of knowledge 08 Appropriate and efficient enforcement	FOEN, FOPH, FSVO, FOAG, SECO, NAChem
23	International chemicals policy	The federal agencies will collaborate on international programmes and regulations (e.g. with SAICM, UNEP, UNECE, the WHO and the OECD).	06 International standards	FOPH, FOEN, FSVO, SECO
24	Good laboratory practice	The federal agencies will coordinate and harmonise GLP-relevant issues on the national and international fronts, and will ensure the monitoring of certain GLP testing facilities. The principle of the mutual acceptance of data (MAD)[26] will also be supported within the overall OECD framework.	06 International standards 08 Appropriate and efficient enforcement	FOPH, FOEN, Swissmedic, NAChem

26 See Glossary.

No.	Short title	Strategic measure	Objectives	Federal agencies involved
25	Monitoring international developments	The Swiss authorities will monitor international developments, especially within the EU, the OECD and the UN, to be able to respond promptly to any and all relevant changes.	01 No data – no market 02 Risk assessment and risk reduction 03 Substitution 04 Sustainable chemistry 05 State of knowledge 06 International standards	FOEN, FOPH, FSVO
Enforcement				
26	Market surveillance and usage checks	The authorities responsible will verify the observance of all their duties and obligations by the distributors and the users of chemical products.	01 No data – no market 02 Risk assessment and risk reduction 07 Users' duty of care 08 Appropriate and efficient enforcement	FOEN, FOPH, FOAG, SECO, NAChem
27	Optimising enforcement	The enforcement of chemicals legislation will be optimised, particularly on the basis of the results of the Market Monitoring Evaluation[27] and through the tapping of synergies deriving from international collaborations.	02 Risk assessment and risk reduction 04 Sustainable chemistry 08 Appropriate and efficient enforcement	FOPH, FOEN, SECO, FOAG, FSVO, NAChem
28	Digitalisation	The enforcement processes and procedures will be further optimised through digitalisation.	02 Risk assessment and risk reduction 08 Appropriate and efficient enforcement	NAChem, FOPH, FOEN, SECO, FOAG, FSVO

27 The final report will be found (in German) on the FOPH website at: www.bag.admin.ch/bag/de/home/das-bag/publikationen/evaluationsberichte/evalber-chemikaliensicherheit-strahlenschutz.html

No.	Short title	Strategic measure	Objectives	Federal agencies involved
Other measures				
29	Promoting sustainable chemistry	Projects, platforms and initiatives to help develop sustainable chemistry will be promoted and supported, especially those adopting a Safe-by-Design approach in their innovation phase[28] and those designed to substitute SVHCs (see 7). The federal agencies will link up with the prime players here.	02 Risk assessment and risk reduction 03 Substitution 04 Sustainable chemistry 09 Minimisation	FOPH, FOEN
30	Stakeholder groups	Regular exchanges will be conducted with the most important stakeholder groups (including cantonal enforcement authorities, unions, industry and trade associations and consumer protection and environmental associations).	02 Risk assessment and risk reduction 03 Substitution 04 Sustainable chemistry 07 Users' duty of care 08 Appropriate and efficient enforcement	FOEN, FOPH, FSVO, FOAG, SECO, NAChem

Table 2: Strategic measures

28 As part of the Confederation's broader promotion of research and innovation, e.g. in the nanomaterials field.

3. Implementation

A regular report on the implementation of chemicals legislation must be submitted to the Steering Committee for Chemicals and Plant Protection Products. These reports shall also pay due regard to the status of achievement of the corresponding objectives. Responsibility for the implementation of the Strategy for Chemical Safety rests with the Chemicals and Plant Protection Products Coordination Committees[29]. When implementing the relevant measures, due and full regard must also be paid to other federal strategies; and any associated conflicts of objectives must be resolved by an appropriate balancing of interests.

3.1. Targets and indicators

With regard to the implementation of the strategy, the strategic objectives are made operational with target values, and indicators are assigned to each target value. This enables the achievement of the intended medium-term objectives to be both measurable and verifiable.

No.	Strategic target	Target(s) for 2023-2027	Indicators
01	**No data – no market**	The intrinsic properties of all chemicals used in Switzerland are known. The chemicals are correspondingly classified and labelled, and the manufacturers pass on the safety-relevant information to the commercial users via the safety data sheets.	Results of controls Qualitative: annual check results
		Notifications are effected for substances that are placed on the market in volumes of ≥ 1 tonne/year and not registered in the EU.	Number of notified substances Results of checks Number of substances subject to notification for which none is received
		Only substances, preparations, PPPs and BPs which are subject to registration and have been legally brought to market are on the Swiss market (also applies to 02).	Results of controls

29 See Annex II.

No.	Strategic target	Target(s) for 2023-2027	Indicators
02	**Risk assessment and risk reduction**	Only chemicals that have been assessed with regard to their risks to human health and the environment are on the Swiss market. Necessary risk reduction measures have been put in place. Manufacturers fulfil their self-regulation obligations.	Results of controls
		The placing on the market and the use of substances with unacceptable risks for the environment and health are adequately restricted.	Qualitative (met, partially met, not met) Compare the Swiss regulations with EU law (including REACH[30] Annex XVII) and international agreements
		Switzerland participates in international programmes and initiatives for the risk assessment of certain chemical substances.	Qualitative (met, partially met, not met)
		The criteria for identifying endocrine disrupters are defined in Swiss chemicals legislation. These are harmonised with those of the EU. These criteria serve as the basis for risk management decisions.	Qualitative (met, partially met, not met)
		The actions or the sales restrictions for chemicals pay due regard to the findings from current cases of poisoning.	Qualitative (met, partially met, not met)
		Measures have been taken for risk reduction when chemicals are correctly used and against their unintended use.	Qualitative (met, partially met, not met)
		The goals and actions of the Plant Protection Product Action Plan and the Federal Act on Reducing Risk through the Use of Pesticides (PPPs and BPs)	What was achieved: Annually: annual reports of the offices responsible.[31] 2024: interim report by the Federal Council on adoption of the Action Plan and the Federal Act (PPP part)
		The risks to surface water and semi-natural habitats and the pollution of groundwater must be reduced by 50% from their 2012-2015 average levels by 2027 (AgricA, Art. 6b, Para. 2).	Indicators as per Art. 10c of the Ordinance on the Assessment of Sustainability in Agriculture. The FOAG publishes annual results.[32]
03	**Substitution**	Substances of very high concern (SVHCs) are (to be) substituted (also applies to 04).	Qualitative (met, partially met, not met) Compare the Swiss regulations with REACH Annex XIV Registration requirement for SVHCs
		Procedures for comparative evaluation are used for PPPs and BPs which contain an active substance to be replaced (substitution candidates).	Results of comparative evaluations per year
04	**Sustainable chemistry**	The aspect of chemical safety is increasingly considered in funded innovation projects (e.g. from Innosuisse[33] in the field of nanotechnology).	Quantitative: Proportion of the funded projects with modules on chemical safety Assistance in CHF for such projects

30 See Glossary.

31 www.blw.admin.ch/blw/de/home/nachhaltige-produktion/pflanzenschutz/aktionsplan/aktuelles.html

32 www.blw.admin.ch/blw/de/home/nachhaltige-produktion/pflanzenschutz/risikoindikatoren_pflanzenschutzmittel.html

33 www.innosuisse.ch/inno/en/home.html

No.	Strategic target	Target(s) for 2023-2027	Indicators
05	**State of knowledge**	Research to clarify mechanisms of action of substances is supported (Adverse Outcome Pathways or AOPs).	Qualitative/quantitative: Number of proposals introduced into the OECD working groups
		Switzerland participates within the OECD's Test Guideline Programme in the development of testing guidelines that are based on alternative and animal-friendly methods.	Qualitative/quantitative: WNT project (co-)led by Switzerland Participation of Switzerland in commenting on new/revised testing guidelines
		First proposals for indicators for the evaluation of the effects of chemicals management on health and the environment are put forward.	Number of indicators proposed
		New provisions on chemicals are considered for inclusion in international agreements and EU law, and are promptly also incorporated into Swiss law.	Qualitative (timely adoption for international agreements; prompt adoption for EU decisions)
		Switzerland participates in scientific committees for the further development of knowledge in the field of safety and the sustainable use of chemicals.	Qualitative: projects at national and international level in which Switzerland participates or provides (co-)financing
06	**International standards**	Switzerland contributes to international resolutions, conventions, guidelines etc. in the field of chemicals and also lobbies internationally for their implementation. All the UN conventions and resolutions ratified by Switzerland and all OECD Council decisions relating to chemicals legislation are adopted into Swiss law and duly enforced. The SAICM guidelines for the prudent risk management of chemicals are observed.	Proportionate numbers (ratified and non-ratified)

No.	Strategic target	Target(s) for 2023-2027	Indicators
07	**Users' duty of care**	Non-confidential data from the notification dossier for chemical substances are accessible to the public.	Qualitative (met, partially met, not met)
		Professional and commercial users who are active in bathing water disinfection, pest control, the use of plant and/or wood protection products and refrigerant handling have the requisite special authorisations and further training.	Results of controls The further training requirement for those special authorisations for which such training seems appropriate is detailed within the relevant departmental ordinances.
		All dealers who supply certain hazardous chemicals (see ChemO Annex 5) have the technical expertise required and inform their recipients on the correct chemicals handling.	Results of controls Number of new training courses completed
		The basic elements for the safe handling of chemicals are included in the relevant training ordinances and training curricula. This also extends to basic vocational education in those professions which require the handling of chemicals generally prohibited for adolescents.	Quantitative: number of training curricula that meet the requirements Qualitative (met, partially met, not met)
		A reduction in the numbers of medium and severe cases of poisoning involving chemicals.	Year-to-year trends in ToxInfo Suisse accident reports
		Official inspections of how chemicals are handled in industrial operations	Quantitative: number of checks conducted by cantonal authorities SECO-IVA evaluation report on enforcement of chemicals legislation
08	**Appropriate and efficient enforcement**	Actions from the report on optimising the procedures and cooperation (within the Confederation and between the Confederation and the cantons) have been defined and are being taken.	Number of actions taken
		The chemicals legislation requirements for companies and their products are checked by the competent authorities by means of spot checks and signal-based controls.	Check and control results
		Switzerland participates in international priority projects to monitor companies and their products.	Number of projects Switzerland is involved in
		Transparency: PPP roadmap actions taken.	Degree of implementation / number of roadmap actions taken
Z9	**Minimising exposure of people and the environment to chemicals**	Decrease in direct exposure to chemicals known to be hazardous and their emissions (and resulting indirect exposure)	Qualitative, based on: • environmental monitoring • evaluation of sales figures for PPPs and BPs and for environmentally hazardous substances • PPP Action Plan targets achieved (annual reports from units responsible)
		Indicators specified by the Federal Council to help reduce risks through the use of plant protection products (AgricA, Art. 6b, Para. 3)	Indicator results

Table 3: Target values for the 2023-2027 period

Annex

Annex I: Matrix of objectives and measures

The following table shows the measures that should help achieve each objective.

		01 No data – no market	02 Risk assessment and risk reduction	03 Substitution	04 Sustainable chemistry	05 State of knowledge	06 International standards	07 Users' duty of care	08 Appropriate and efficient enforcement	09 Minimisation
Notification, authorisation and registration obligations and risk assessment, management and reduction										
1	Obligation to notify for certain chemicals	●	●						●	
2	Authorisation procedures for PPPs and BPs	●	●	●					●	
3	Obligation to register certain chemicals		●						●	
4	Risk assessment of selected chemicals		●				●			
5	Restriction of certain substances		●				●			
6	Classification and labelling system		●				●			
7	Authorisation procedures for certain SHVCs		●	●	●					
8	Endocrine-active substances		●	●		●	●	●		
9	Pesticide risk reduction	●	●	●	●	●	●	●	●	●
10	Synthetic nanomaterials	●	●	●	●	●	●	●	●	●
11	Greater protection for employees using chemicals							●	●	
Promoting research										
12	Support from SCAHT and the Ecotox Centre		●			●	●			
13	Further development of risk evaluation methodologies		●			●	●			
14	Chemicals policy impact evaluation		●			●	●			
15	Acquiring knowledge on chemicals as a cause of diseases		●			●				
16	Launching a national HBM study		●			●	●			
17	Identifying new risks		●			●	●			

		01 No data – no market	02 Risk assessment and risk reduction	03 Substitution	04 Sustainable chemistry	05 State of knowledge	06 International standards	07 Users' duty of care	08 Appropriate and efficient enforcement	09 Minimisation
Information, education and transparency										
18	Providing information and advice	●	●					●	●	●
19	Information on environmental indicators						●	●	●	●
20	Promoting education		●		●			●		●
21	Transparency in plant protection product authorisation procedures	●	●	●			●			●
International collaboration										
22	Collaboration with the EU		●			●			●	
23	International chemicals policy						●			
24	Good laboratory practice						●		●	
25	Monitoring international developments	●	●	●	●	●	●			
Enforcement										
26	Market surveillance and usage checks	●	●					●	●	
27	Optimising enforcement		●		●				●	
28	Digitalisation		●						●	
Other measures										
29	Promoting sustainable chemistry		●	●	●					●
30	Stakeholder groups		●	●	●			●	●	

Table 4: Matrix of objectives and measures

Annex II: Organisation of the federal implementation of chemicals legislation

Five federal agencies and the Notification Authority for Chemicals are essentially involved in the federal implementation of chemicals legislation:

- the Federal Office for the Environment (FOEN), for the environmental protection issues and indirect health protection;
- the Federal Office of Public Health (FOPH), for health protection issues;
- the Federal Food Safety and Veterinary Office (FSVO), for food safety issues, PPP health protection and the PPP Authorisation Body;
- the Federal Office for Agriculture (FOAG), for specific plant protection product issues;
- the State Secretariat for Economic Affairs (SECO), for worker protection issues;
- the Common Notification Authority for Chemicals (NAChem) of the FOEN, FOPH and SECO, as the central authority for industry notifications and authorisations.

The inter-agency implementation organisation can be described schematically as follows:

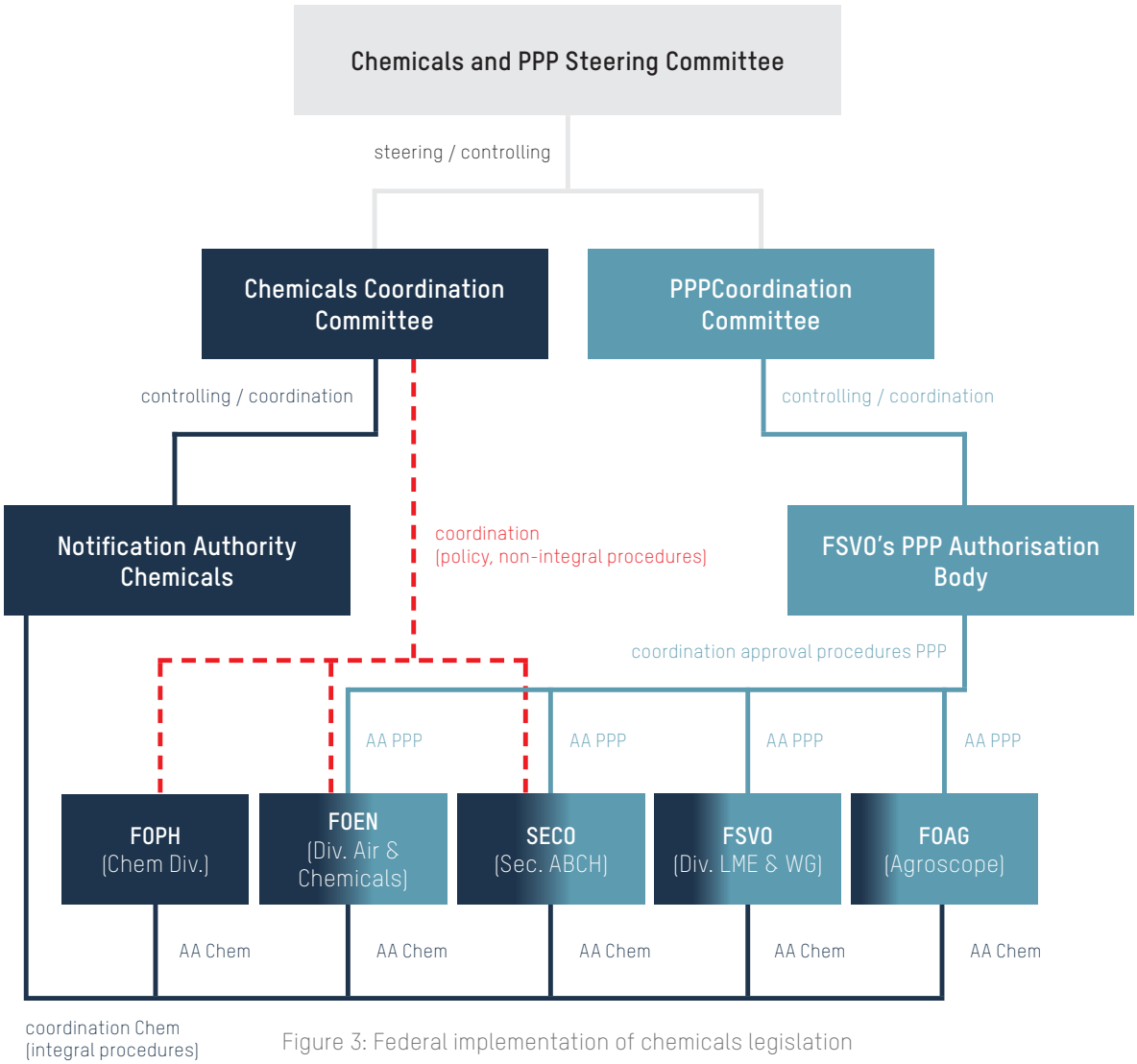

Figure 3: Federal implementation of chemicals legislation

The **Chemicals and Plant Protection Products Steering Committee** consists of the Directors of the FOEN, FOPH, FSVO, FOAG and SECO. Its duties and tasks within the framework of chemicals implementation include:

- defining and reviewing strategy (see Chapter 3 above)
- steering and managing the Notification Authority for Chemicals (NAChem) and the FSVO's Plant Protection Product Authorisation Body (PPP AB)
- steering and managing the associated interdepartmental procedures.

The **Chemicals Coordination Committee** is composed of the heads of the specialist departments, the specialist fields and the departments of the FOPH, the FOEN and the SECO as well as of NAChem. The heads of the specialist departments of the FOAG and the FSVO have observer status. The duties and tasks of the Coordination Committee are:

- supervising NAChem (controlling: achievement of objectives, budget, strategy), reporting to the Steering Committee, de-escalating disputes between the federal agencies involved
- organisational coordination of the interdepartmental enforcement procedures (notifications, registrations, authorisations) that are handled by NAChem
- coordinating further activities of the federal agencies involved in connection with the enforcement of chemicals legislation, in particular coordinating strategies in chemicals enforcement and the technical and legal coordination of chemicals legislation.

The **Common Notification Authority for Chemicals (NAChem)** of the FOPH, the FOEN and the SECO is the central authority for industry notifications and authorisations. NAChem processes all notifications of existing hazardous substances and preparations as well as applications for registrations of new substances and biocidal product authorisation applications.

The **PPP Coordination Committee** consists of the heads and the coordinators of the specialist departments of the FOAG, the FOEN, the FSVO and the SECO as well as of the PPP LO. The specialist department of the FOPH has observer status. The duties and tasks of the PPP Coordination Committee comprise the coordination of specialised and strategic questions in connection with the implementation of the Plant Protection Products Ordinance (PPPO).

The **FSVO's PPP Authorisation Body (PPP AB)** is the central implementation body for the authorisation of PPPs, and handles the applications from companies for PPP authorisations.

Within the federal agencies involved, the specialist departments and specialist disciplines serve as **assessment authorities (AAs)** for handling applications from the relevant specific specialist perspective.

Glossary

3R Principles	The application of the principles of the 3Rs – Replacement, Reduction and Refinement – is intended to limit animal testing to the absolute minimum and to distress the animals involved as little as possible. Replace means replacing animal testing with alternative methods, Reduce means fewer animal tests, and Refine means that the stress on the tested animals is reduced.
Agenda 2030	The 2030 Agenda for Sustainable Development contains 17 objectives (Sustainable Development Goals, SDGs) on various topics such as overcoming extreme poverty and hunger, education, health, water etc. Its ramifications for chemical safety derive inter alia from Goal 2 of sustainable agriculture and Goal 3 of a healthy life for all.
Biocidal products	Chemicals for use against harmful organisms.
Chemicals management	Processes, standards and framework conditions which allow social benefits to be realised from the use of chemicals without any negative effects on the environment or on human health.
CLP Regulation	Regulation (EC) No. 1272/2008 on the classification, labelling and packaging of substances and mixtures. The EU introduced the GHS with the CLP Regulation.
Comparative assessment	The concept of comparative assessment envisages that active substances (in the PPP or BP field) which, although fulfilling all legal requirements, nevertheless have certain unfavourable properties for health and the environment, are to be declared "candidates for substitution". Plant protection products and biocidal products with such substitution candidates may only be authorised for use when no economic and feasible alternatives exist that are significantly safer for humans and the environment.
GHS	The Global Harmonised System for the classification and labelling of chemicals.
GLP	Good Laboratory Practice regulates the conducting of safety checks for chemical products.
MAD	The OECD decision on the mutual acceptance of data (MAD) stipulates that data obtained from tests on chemicals in an OECD member state in accordance with the OECD testing guidelines and the basic OECD principles of Good Laboratory Practice should be accepted in other member states for the purposes of the protection of human health and of the environment.
MRA	An agreement between the EU and Switzerland on the mutual recognition of conformity assessments.
Plant protection products	Chemicals used to combat diseases, pests and weeds in crops.
REACH	REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals and regulates the handling of chemicals in the EU.
SAICM	The SAICM (Strategic Approach to International Chemicals Management) global chemicals strategy is a framework agreement which aims to promote the sustainable management of chemicals.
Self-regulation	The responsibility and liability for correctly placing the majority of chemical products on the market lies entirely with the relevant manufacturers. The principle of self-regulation applies, under which the manufacturer must ensure that their products do not harm human health or the environment. In particular, the manufacturer must classify, package and label their products based on their properties, and must compile exposure scenarios and a safety data sheet for the same (see ChemA, Art. 5 and ChemO, Art. 5).
Sustainable chemistry	The endeavour, when handling chemical substances in industry and the laboratory and when manufacturing and using chemical substances and products, to protect the environment and its resources, by ensuring that fewer environmentally harmful chemical compounds are employed. At the same time, the compounds used should be wholly returned into the material cycle, and processes with low energy consumption should be applied.

Unacceptable risk	The decisive issue in risk management is whether the acceptance of the risk can be justified and the risk in this sense is "reasonable". In chemicals management this decision is mainly supported by the existence of scientifically founded effect thresholds, below which harm to health or damage to the environment are not expected. An unacceptable risk results from the use of a substance through which an exposure occurs which exceeds the effect threshold. This simple concept of the "qualitative evidence" of risk differs from the "quantitative risk assessment" or "risk-benefit analysis" which are used in other technical fields and also in chemicals management when threshold values cannot be derived (e.g. frequently for CMR substances).

List of abbreviations

AA	assessment authorities
ABCH	The SECO's unit for chemicals and labour in the working conditions field
AgricA	Federal Act on Agriculture (Agriculture Act)
AOP	adverse outcome pathways
BPs	biocidal products
ChemA	Federal Act on Protection against Dangerous Substances and Preparations (Chemicals Act)
ChemFO	Ordinance on Fees for the Federal Enforcement of Chemicals Legislation (Chemicals Fees Ordinance)
ChemO	Ordinance on Protection against Dangerous Substances and Preparations (Chemicals Ordinance)
ChemPICO	Ordinance on the Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Chemicals in International Trade (PIC Ordinance)
CHF	Swiss francs
CLP	classification, labelling and packaging[34]
CMR	cancerogene, mutagene, reprotoxic
DETEC	Federal Department of the Environment, Transport, Energy and Communications
ECHA	European Chemicals Agency
ECVAM	European Centre for the Validation of Alternative Methods
FDHA	Federal Department of Home Affairs
EFSA	European Food Safety Authority
EPA	Federal Act on the Protection of the Environment (Environmental Protection Act)
EU	European Union
EURL-ECVAM	European Union Reference Laboratory for alternatives to animal testing
FAO	United Nations Food and Agriculture Organization
FOEN	Federal Office for the Environment
FoodA	Federal Act on Foodstuffs and Utility Articles (Foodstuffs Act)
FOPH	Federal Office of Public Health
FOAG	Federal Office for Agriculture
FSVO	Federal Food Safety and Veterinary Office

34 See Glossary.

GHS	Globally Harmonized System of Classification and Labelling of Chemicals[35]
GLP	International Labour Organization
IUCLID	International Uniform Chemical Information Database
LME	Abteilung Lebensmittel und Ernährung (Food and Nutrition Division, FSVO)
LuChem	Abteilung Luftreinhaltung und Chemikalien (Air Pollution Control and Chemicals Division, FOEN)
MRA	Mutual Recognition Agreement24
NAChem	Notification Authority for Chemicals
OBP	Ordinance on the Placing on the Market and Handling of Biocidal Products (Ordinance on Biocidal Products)
OECD	Organisation for Economic Co-operation and Development
OGLP	Ordinance on Good Laboratory Practice (GLP Ordinance)
ORRChem	Ordinance on Risk Reduction related to the Use of certain particularly dangerous Substances, Preparations and Articles (Ordinance on Chemical Risk Reduction)
PIC	Rotterdam Convention on Prior Informed Consent
PlantPPO	Ordinance on the Placing on the Market of Plant Protection Products (Plant Protection Products Ordinance)
POPs	persistent organic pollutants
PPP	plant protection product
PPP AB	Plant Protection Product Authorisation Body
PRTR	Pollutant Release and Transfer Register
PRTRO	Ordinance on the Register relating to Pollutant Release and the Transfer of Waste and of Pollutants in Waste Water (PRTR Ordinance)
R4BP	Register for Biocidal Products
REACH	registration, evaluation, authorisation and restrictions of chemicals35
SAICM	Strategic Approach to International Chemicals Management35
SCAHT	Swiss Centre for Applied Human Toxicology
SECO	State Secretariat for Economic Affairs
SVHCs	substances of very high concern
TBA	Federal Act on Technical Barriers to Trade
UN	United Nations

35 See Glossary.

UNECE	United Nations Economic Commission for Europe
UNEP	United Nations Environment Programme
UNIDO	United Nations Industrial Development Organization
UVG	Federal Accident Insurance Act
WG	Abteilung Wissensgrundlagen (Knowledge Base Division, FSVO)
WHO	World Health Organization
WNT	Working Group of National Coordinators of the OECD Test Guidelines Programme
WPA	Federal Act on the Protection of Water against Pollution (Water Protection Act)

Imprint

Strategy for Chemical Safety

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