



Council of the European Union  
General Secretariat

Brussels, 10 November 2025

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**Interinstitutional files:  
2025/0207 (COD)**

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WK 15111/2025 ADD 1

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## CONTRIBUTION

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From: General Secretariat of the Council  
To: Ad hoc Working Party on the ECHA Basic Regulation

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N° prev. doc.: WK 14447/2025  
WK 14088/2025

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Subject: ECHA Basic Regulation: comments from a delegation

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Following the call for comments on the above set out with WK 14447/2025, delegations will find attached comments from HU.

HU's comments on the proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the European Chemicals Agency and amending Regulations (EC) No 1907/2006, (EU) No 528/2012, (EU) No 649/2012 and (EU) 2019/1021), following the compromise text published with WK 14088/2025.

While recognising the need to strengthen the capacities of the RAC and the SEAC, Hungary would like to reiterate its continued concerns about the proposed mandatory nomination of two members to each committee.

We still believe that the Estonian proposal, which allows Member States to nominate up to four members to the Committees on a voluntary basis, would be the most suitable solution for Member States with limited capacities.

However, as it appears that numerous Member States do not support this approach, we propose, as a further compromise, the mandatory delegation of **one** member per Member State, while also retaining the possibility for the Member States with capacity constraints to use the list of experts managed by ECHA. The relevant textual proposals are as follows:

201	Article 14(1), first subparagraph		
	Commission proposal	Presidency compromise text	Hungarian proposal
	1. Each Member State shall nominate two candidates for membership of RAC and may nominate up to two additional candidates.	1. Each Member State shall nominate two candidates for membership of RAC and may nominate up to two additional candidates.	1. Each Member State shall nominate <del>two</del> <b>one</b> candidates for membership of RAC and may nominate up to <del>two</del> <b>three</b> additional candidates.
203	Article 14(2), first subparagraph		
	Commission proposal	Presidency compromise text	Hungarian proposal
	2. Each Member State shall nominate two candidates for membership of SEAC and may nominate up to two additional candidates.	2. Each Member State shall nominate two candidates for membership of SEAC and may nominate up to two additional candidates.	2. Each Member State shall nominate <del>two</del> <b>one</b> candidates for membership of SEAC and may nominate up to <del>two</del> <b>three</b> additional candidates.