



F.E.C.C.I.A.

**Fédération Européenne des Cadres de la Chimie
et des Industries Annexes**

**European Federation of Managerial Staff in the Chemical and
Allied Industries**

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FECCIA Resolution regarding the European White Paper on Chemicals Policy

FECCIA (Fédération Européenne des Cadres de la Chimie et des Industries Annexes) is the European Federation for Executive and Managerial Staff in the chemical industry. The national associations of Executive and Managerial Staff for the chemical industry of five European countries belong to FECCIA.

As the European umbrella organisation, representing more than 40,000 executives within the chemical industry in Europe – and because of the immediate concern for its members and for the position of the chemical industry in Europe - FECCIA feels obliged to issue the following statement regarding the EU White Paper on Chemicals Policy :

FECCIA, as the European umbrella organisation of Executive and Managerial Staff within the chemical industry, would specifically welcome the replacement of the existing national regulations of chemical policies by a unified, EU-wide regulation.

In nearly all EU member states, the chemical industry belongs to those sectors which contribute most to growth and prosperity. The chemical industry can offer a variety of career opportunities with good future prospects to large numbers of people in Europe. Thus a responsible chemicals policy has to take into account the economical importance of the chemical industry within the EU.

'Yes' to the Protection of Users and Consumers

FECCIA welcomes and supports unified, EU-wide regulations, if these contribute to improving the protection of both the environment and the consumer, as well as safety at the work place. FECCIA would appreciate it even more, if in addition these regulations also strengthened the competitiveness of the European chemical industry and increased the employment of qualified personnel.

The general intention of the White Paper to increase the protection of users and consumers is therefore fully supported by FECCIA. FECCIA considers purposeful initiatives by the legislature both sensible and important, as well as the self-commitment of the chemical industry with regard to the trade in and secure handling of chemicals by users and processors. Through these initiatives in particular, the acceptance of the chemical industry among the European population may be improved.

Chemistry needs explanation instead of Demonisation

In many parts of the European population the chemical industry regrettably and unjustly suffers from a negative image, though it contributes largely to the protection of the environment and to the improvement of health for both humans and animals. Contrary to wide-spread prejudice, it is not chemical products that are – even today - the biggest threat to mankind, but diseases and natural catastrophes; the chemical industry in particular contributes to reduce these threats. The fact that a chemical product may cause danger or even damage if not handled properly should not lead to a demonisation of chemical products in general. Some so-called ‘natural products’ may be even more dangerous than chemical products if used without expertise. Improved information about the way to handle chemical products properly is required, not their demonisation.

Without doubt it is also the duty of the European chemical industry to inform the public about the proper way to handle chemical products and thus to improve its public image. The chemical executive personnel organized in the member associations of FECCIA are prepared to make their contribution. The chemical industry and its executives in Europe, however, need the support of the public institutions, and in this context the institutions of the EU are of special importance.

From FECCIA’s point of view it is regrettable that the White Paper does not contain any contribution to this necessary act of informing the public, but instead encourages unjustified prejudices about the chemical industry and its products.

Proposals in the White Paper : more Bureaucracy but no Improvements

Many of the requirements listed in the White Paper will lead to an impractical, cost-inefficient bureaucratic system without resulting in improved protection of either the environment or the consumer.

FECCIA is greatly concerned, and points out - among other things - that:

- a time limit for the admission of so-called dangerous substances is proposed which - from a European perspective - will automatically have a negative influence on investment by globally active businesses
- the intended regulations would result in movement of production out of the EU and thus in a decrease in both employment and tax revenue within the EU. The objective of the White Book to improve consumer protection, however, would not be achieved, because the products would just be produced outside the EU and still – because of WTO regulations – be sold on the European market.
- the discussion is solely based on the intrinsic characteristics of the substances, without taking into account the exposure risk.

Conclusions

In future, FECCIA and the executive personnel of the chemical industry organised in FECCIA's member associations will strictly reject any regulations which just present themselves as obstacles to innovation and investment and which have a negative effect on the employment situation, without improving effectively the protection of either the environment or the consumer.

The institutions within the EU and within its individual member states are equally invited to implement sustainable regulations for a chemical policy, i.e. regulations that find a balance between economical, ecological and social concerns.

- Such regulations must be in force uniformly within the whole of the EU.
- Expenditure and costs should be kept to a minimum, e.g. through the use of existing information and the limitation of multiple registrations and tests.
- Assessments and evaluations should be based on concrete risks rather than intrinsic material properties.
- Intermediate products should be excluded from the registration and admission procedure.
- The admission procedure has to be brief in order not to cause any delay in introducing a product to the market.

If both the national and the EU institutions were also successful in informing the public about the importance of Chemistry and the proper handling of chemical products, then this would be for the benefit of all - not just for those working in the chemical industry.

FECCIA and the Executive and Managerial Staff of the chemical industry organised in FECCIA's member associations are willing to support a policy which has such intentions, and are ready to participate in the necessary political and social dialogue.