



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**

**56, rue de Batignolles F - 75017 PARIS
Phone: +33 1 42 28 28 05 Fax: +33 1 42 28 12 99**

Affiliated to European Confederation of Executives and Managerial Staff (CEC)

Barcelona, 13/03/2004

REACH - FECCIA Responds

FECCIA, the European federation representing 40000 Executive and Managerial Staff in the chemical industry, welcomes EU wide regulatory framework for chemicals that will replace existing national laws.

But FECCIA believes that the regulations proposed on the 29th of October 2003 endanger the future of the Chemical Industry and they will threaten the employment of its members.

The EU Chemical Industry is a powerful contributor to the growth of the economy. The industry offers 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 economic & social importance of the chemical industry within the EU.

'Yes' to the Protection of Users, Consumers and Environment

FECCIA welcomes and supports unified EU-wide regulations which contribute to improving environmental protection and consumer & worker safety. FECCIA would support them even more strongly, if the regulations also strengthened the competitiveness of European chemical industry and increased the employment of qualified personnel.

FECCIA supports increased protection of users and consumers. FECCIA considers the chemical industry should and will continue and improve the regard to safe and secure handling of chemicals. Through these initiatives the image of the Chemical Industry will be improved.

Chemicals: Better understanding, Better education

The Chemical Industry has a very negative image to many Europeans which is not justified. But the Industry makes a big contribution to environmental protection and human health.

Some chemicals are dangerous and their use may create risk, if not handled properly. However this should not lead to legislation which weakens the Industry for the future. Some so-called 'natural products' may be even more dangerous than man made chemicals. FECCIA supports more education about the proper use of chemical products and their value to society. This will lead to an improved image of the Industry.

REACH: More Bureaucracy / No Benefits

The proposed regulations would create an impractical expensive & bureaucratic system with no greater protection for either the environment or the consumer.

FECCIA is greatly concerned, because:

- A temporary authorisation for dangerous substances will be harmful to the Industry from European perspective, which will have an automatically negative influence on investment by globally active businesses.
- The intended regulations would result in production leaving the EU resulting in lower employment and tax revenue within the EU.
- Improved consumer protection would not be achieved, because the products would just be produced outside the EU and could be imported into the European market according to present WTO regulations.
- The high costs and bureaucratic procedures would be too damaging for SMEs.
- The proposals should take exposure **and** intrinsic properties into account when assessing a chemical.

Conclusions

FECCIA opposes any regulations which may damage Investment, Innovation and job prospects, without improving environmental or consumer safety.

The institutions within the EU and within its individual member states are invited to develop sustainable regulations for Chemicals that balance economic, ecological and social concerns.

- Expenditure and costs should be kept to a minimum, e.g. through the use of existing information and a study of relevant properties of high concern.
- Assessments and evaluations should be based on identifiable risks and not on intrinsic material properties.
- Intermediate products should be excluded.
- The procedures must be brief in order not to cause any delay in introducing a product to the market.
- There should be a central single Agency at the European Level and the registration shall be valid in Europe as defined by the EU.
- There should be no doubt that the proposed Regulations will override existing National and European regulations. Multiple registrations shall not be required.
- National and the EU institutions must be successful in educating the public about the importance of Chemistry and the proper handling of chemical products: This would be for the benefit of everyone - not just for those working in the chemical industry.

FECCIA and its members in the chemical industry support a policy which has these objectives; they will participate in the political and social dialogue necessary to achieve it.