



ECRN Joint Position

concerning the New European policy on Chemicals

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At the meeting of the ECRN permanent working group held in Brussels on September, 21, 2006, members jointly agreed this position paper on the future policy of the EU on chemicals.

The ECRN supports the goal of the European Commission to restructure the European law on chemicals for the reasons of protecting human health and environment.

Agreement on the draft Regulation on the Registration, Evaluation and Authorisation of Chemicals (REACH) is expected by the end of this year.

The ECRN, representing a broad range of chemical regions from all over Europe, has actively participated from the outset in the discussion on REACH giving consistent and timely input into the consultation and development process.

The experiences of ECRN regions show that there is a urgent need to prepare, in particular, small and medium-sized enterprises (SMEs) for in order to be able to comply with the implementation of the REACH requirements. The SME need information and financial support given that:

- SMEs will face huge problems with implementation of REACH;
- SMEs currently do not have all data and information about substances they produce or import necessary for registration under REACH;
- Check in public data basis can not solve the problems of SMEs. Not all data are publicly available;
- There will be short cuts based on limited testing capacities;

In the Common Position of the EU Council (June, 27th, 2006) many amendments of the ECRN were already taken into consideration but the whole REACH system requires greater simplification to facilitate compliance and implementation by small and medium-sized enterprises.

The ECRN support the following amendments:

- The so-called “registration package” from the first reading of the European Parliament should be retabled because it improves the situation for registrants in the range of 1 to 10 tonnes/year more significantly than Council Position This especially important / relevant for SMEs.
- The instrument of exposure driving waiving is supported the Parliament proposal is a good basis for further negotiation.
- The guidelines (RIP) shall cover guidance on providing justifications on the use of existing data.
- The registration of substances in preparations by importers is not proportional and not practicable either. It should be considered to register only the preparation itself.
- SME should be financially supported to implement REACH. EU-wide financing instruments are necessary to support companies.