



ECRN Joint Position

Joint Declaration of the ECRN Presidium

01.12.04, Brussels

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The European Union is faced with big challenges in the coming years: The enlargement of 10 new Member States has to be managed, the new constitution has to be ratified, before all the targets set in Lisbon in 2000, to make Europe the most competitive region in the world, are addressed.

The newly elected European Parliament and the European Commission are under immense pressure to combine the objectives of competitiveness, sustainability and solidarity in a meaningful way to give new impetus to the process of European integration.

The European Chemical Regions Network (ECRN) is a co-operation platform of chemical regions including in Germany, Great Britain, the Netherlands, Belgium, Spain, Italy, Poland and Estonia. It aims at fostering and profiling the regional aspects of sustainable development for the chemical industry in the European Union.

At the meeting of the network Presidium on the 1.12.04 in Brussels the following declaration was adopted:

To improve competitiveness in the European Union!

- The Lisbon objective can only be met, if the framework conditions for growth, innovation and employment in Europe are drastically improved.
- The European chemical industry is the third-largest employer in the EU, making the largest contribution to the EU trade surplus. Chemical products and processes are often the starting point for innovation and for new competitive advantages of the industry in Europe. At the same time this industry is like no other part of global competition.
- European Commission and the European Parliament are called upon to provide their support so that:



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- European legislation and regulation are checked for their impact on growth and employment and if necessary are modified.
- the impact of EU policies on global competitiveness are taken into account more seriously,
- regional actors who are working for small and medium sized companies, to find easier and more applicable solutions, should receive more recognition when new policies are being developed at EU level and
- together with the chemical regions new and more efficient solutions are sought to achieve sustainability and competitiveness.

The European Chemical regions are offering:

- to be recognised as pilot regions in the European Union for regional impact assessments prior to the development of new EU-legislation,
- to feedback information on the implementation of EU regulation in the debate about the future design of EU policies.

To make European Chemical Policy work!

- The first reading of the Commission proposals on REACH will take place shortly in the European Parliament. It is already clear today that the divide between critics and supporters of the REACH proposal has become even bigger.
- The European Chemical Regions Network is of the opinion that it is necessary, in the coming debate on REACH, to arrive at a coherent and effective system for registering chemicals in Europe.



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- Many regional simulations and discussions have shown that the current proposals for the registration are not practical particularly for smaller and medium sized companies, and will cause considerable unexpected extra expense.
- The results of various analyses regarding the practicability of REACH must have consequences for the future design of the regulation.
- These are the companies which need help and support in our regions, in order to avoid them losing their competitiveness because of the new REACH system.
- However, in the meantime many institutions and actors agree on the basic objectives of the new chemicals policy but at the same time there is no broad consensus achieved how these objectives can be implemented in a balanced and efficient way.
- The European Chemical Regions Network is therefore calling upon the European Parliament, to define prior to the first reading in an overall resolution, the key objectives of the REACH Regulation.
- From the point of view of the European Chemical regions the following points should be included in this:
 - a clear commitment to arrive at a uniform chemical policy in Europe.
 - a shift of paradigm from a purely quantitative approach for determining data requirements towards a registration system focussing on exposure and intrinsic properties of substances.



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- a graded registration of chemicals depending on their intrinsic properties and exposure (substances with high toxicity and exposure first and chemicals with low toxicity and low volume last).
- the development of a pre-registration procedure with the necessary data sheets on basic intrinsic properties and exposures to provide the basis for prioritisation in the registration system.
- a simplified procedure to build consortia to register the substances through the setting up of inventories of producers and products for pre-registration by the European Chemical Agency.
- Registration on the principle one substance one registration by strengthening the role of the Agency in building consortia.
- Development of clear and transparent rules for dividing the registrations costs between producers, downstream users, importers, etc. by the European Chemical Agency.
- to present the proposed changes of the REACH proposal in the work of OECD committees. A REACH system which is compatible with the OECD regulations could help to avoid distortion of competition which could happen with an isolated action of the European Union. Otherwise the movement of production sites out of Member States towards Third countries and the loss of employment this implies has to be feared.



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The European Chemical regions are offering:

- to take part in regional simulations and impact assessments and to participate pro-actively in the future debate on the design of the chemicals policy in Europe, and
- to work for an efficient European chemical policy in the chemical regions, based on common objectives.

To globalise climate policy!

- The European Chemical Regions Network has taken part in the stakeholder consultation of the European Commission regarding future actions on climate change and has taken the following position:
- The chemical industry belongs to the most energy intensive sectors and is in particular faced with global competition.
- The consequences of climate change hold no frontiers and can only be effectively tackled with global solutions.
- From the viewpoint of the chemical regions a successful climate policy can only be achieved in a worldwide setting: “global participation first and setting policies and targets next”. For the EU to take a lead on this is highly desirable
- What is required is a system that is based on the most efficient use of energy and not a system that restricts growth to achieve reductions in greenhouse gas emissions



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- More ambitious climate targets need a powerful encouragement of innovation (R&D, stimulation of implementation) and a much more active role of governments to provide the conditions to make it happen
- Renewables will play a vital role, however more focus is needed to learn from past and current experiences, to adapt policies that provide more sustainable and efficient solutions. Renewables will, over the next 20 years, be a relatively small part of the solution
- The European Chemical Regions Network considers that the development of suitable technologies must continue and economically viable solutions have to be pursued. For a successful climate policy it will possibly not be enough to develop “conventional” alternatives such as sun- or wind energy. It is necessary to increase efforts to search for further technical solutions. For this it is necessary to have concentrated basic research, which includes all options. For this reason EU research has to be more focussed and clear priorities have to be set.
- The practical success of the Kyoto protocol depends on the fact that all areas and sectors will actively participate in it. Under these conditions emission trading together with Joint Implementation (JI)/Clean Development Mechanism (CDM) can be cost efficient and can have a distributive effect. If however, political implementation requires more bureaucracy and an extensive infrastructure for control, the system will fail.
- The design of future climate policy must neither lead to the chemical regions in Europe becoming losers in international competition, nor should it be allowed to prevent or severely restrict the chemical industry's future growth. The effects of the objectives and measures of climate policy on these regions must therefore be investigated at the outset.



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- Climate protection policy cannot lead to new distortions of competition and must therefore be based on fair and uniform framework conditions at global level.
- European markets for electricity and gas must be further liberalised, because of the effect on competitiveness and energy efficiency and contribution to climate protection. Subsidies that distort competition must be driven back further. The instruments of taxation and economic intervention should only be used in those cases where market based mechanisms fail.
- Climate policy must be targeted in order to make a permanent contribution to lasting development and to strengthen competitiveness, for the purposes of the Lisbon strategy. They must be arranged so that technological innovations are truly promoted and the conservation of resources is speeded up.

The European Chemical regions are offering:

- to take part in the future debate on climate policy,
- to reinforce efforts for the efficient use of resources at regional level.



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For more Information

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Notes for Editors:

ECRN: The “European Chemical Regions Network” has the objective to exchange experiences about the joint challenges for chemical regions and initiate a mutual learning for the strengthening of the chemical sector. Joint positions on relevant policy issues are developed to raise the regional voice in the European decision making process. The partner regions are Saxony-Anhalt as the coordinator, North Rhine Westphalia and Lower Saxony (GER), Huelva, Asturias and Catalunya (SPA), Lombardia and Piemonte (ITA), North East and North West of England (UK), Limburg (NL), Masovia (PL) and Ida-Viru (EST). Contacts to further chemical regions have been established to enlarge the network and become a stakeholder at European level. The total project budget is 1.639.000 €, 61% of which is funded by the European Union. More details about the ECRN can be found on its website at www.ecrn.net.

INTERREG IIIC is an EU-funded programme that helps Europe’s regions form partnerships to work together on common projects. These projects enable regions to share knowledge and experience that will help them develop new solutions to economic, environmental and social challenges. 98 percent of all European Union regions are involved in INTERREG IIIC projects. There are more than 250 INTERREG IIIC projects running involving 2500 local and regional actors from 50 countries; 20 percent of these are from new EU Members. More information on INTERREG IIIC can be found on www.interreg3c.net.