



To the attention of
Guido Sacconi MEP
Hartmut Nassauer MEP

Brussels, 15 November 2005

REACH

Dear Mr. Sacconi, dear Mr. Nassauer,

From various sources we have understood that a political agreement has been achieved between the two biggest groups in the European Parliament for the first reading.

We do very much appreciate such a compromise, as this important legislation needs a broad majority in the European Parliament. This will also help to get the necessary support for this ambitious legislation from the stakeholders involved with chemicals and to generate even more results in the implementation of the legislation. We as the Trade Union Federation representing workers in the chemicals industry do regard this as an important step forward.

In detail we do very much support

- the intended simplification via the foreseen 18 month pre-registration
- the risk-based approach to determine the extent of safety data for the future chemicals agency
- the waiver-option for data requirements between 10 and 100 tonnes
- and the proposal for a more flexible OSOR-system.

This we believe will also help to understand better the role of the Chemicals Agency in which the involvement and initiatives of social partners on a tripartite bases is important to make REACH a success. The social partners in the chemical industry have already committed themselves to look after additional activities on health and safety aspects in sharing experience and good practice with downstream-user industries. We are convinced that this could add a lot to a successful implementation of the new legislation.

We have also understood that there is further need on clarification on the authorisation aspect of the legislation. We hope very much that it will be possible to achieve a workable solution also on this crucial issue, as decisions on investment need at least medium term sustainability for producers and products.

We support very much the call to the EU-Commission to act as a broker in the decision taking process between the European Parliament and the European Council, as soon as both have adopted own statements.

Best regards

Reinhard Reibsch
General Secretary