

| REACH affects all branches

All physical products are composed of substances. REACH therefore has not only an impact on the chemical industry but on nearly all branches as well as on enterprises of all sizes, ranging from the textile, electronics and automotive industries, the mechanical engineering and plant construction industries to the crafts enterprises.

| Further information on REACH

- BDI Position Paper on the REACH Regulation
- ADL Study: Economic impact of the EU substances policy
- UNICE Position Paper: "An industry recommendation to improve the efficiency and workability of REACH"
- Summary of the Impact Assessment Case Studies by the EU Commission and Industry, carried out by KPMG

More at: www.bdi-online.de/umwelt

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REACH

**An environmentally sound and
practicable EU Substances Policy**
The BDI on the new regulation
of the EU substances policy

| REACH* is to

- Eliminate deficits in data regarding the properties of nearly all substances and their impact on human beings and the environment.
- Set up a data pool for substances to be registered (approx. 30 000) and their use.
- Enable decisions to be made on the use of substances in order to reduce/avoid disease and damage to the environment.
- Enhance the competitiveness of the EU industry and the EU internal market.

* Proposal by the European Commission for a Regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH") of 29 October 2003.

| The current REACH draft would lead to:

- Substances being eliminated for economic reasons and not as a result of the risks they involve.
- High registration and additional testing costs for companies without any perceptible additional benefit for human beings and the environment, many additional animal tests.
- Putting confidential company and business information at risk.
- Loss of innovation potential and time for developing new products and market introduction.
- Overlapping with many other existing EU regulations on substances and products.
- Massive restriction of European industry's competitiveness vis-à-vis other economic regions.
- Registration of all existing substances requiring 11 years.

| A better REACH needs:

- An efficient and practicable set of instruments.
- Substantial improvements for the central procedural steps regarding the Commission's proposal. The survival of small and medium-sized enterprises is particularly dependent on this.
- The range of preferably all available substances and uses as innovation depends on "new" and "old" substances in many new combinations.
- A thorough alignment and a clear delimitation with regard to current regulations on substances and products in order to avoid double regulation, contradictions and superfluous bureaucracy.
- Risk-based elements in the registration process in order to categorise data and testing requirements according to the given risk and to use resources efficiently.
- Joint pre-registration of all substances and resulting prioritisation to achieve as soon as possible certainty regarding the substances to be registered and to cover higher risks as soon as possible.
- Use and exposure categories in order to achieve efficient communication along the supply chain while safeguarding confidential business information.
- Prioritising of existing structure-related data instead of substance-related testing.
- Exceptions to be made for research and development in order to retain the flexibility required for innovation processes.
- Cost reduction by pragmatic delimitation of quality requirements with regard to tests.