



Union of Industrial and Employers' Confederations of Europe  
Union des Confédérations de l'Industrie et des Employeurs d'Europe

DFH/JPC/nd/22.4/8/1

16 March 1999

Mrs Emma Bonino  
Member of the  
European Commission  
BREY 10/54  
200 rue de la Loi  
1049 Bruxelles

Dear Madam,

RE: REVIEW OF DIRECTIVE 92/59/EEC ON PRODUCT SAFETY

Further to its own inquiries, UNICE was very recently informed by a representative of DG XXIV that the Commission has started to work on review of the above directive some time ago.

We have been surprised to learn that a working group has been set up to discuss amendments to the directive, prior to any open consultation. We were informed that, in addition to representatives of Member States and standardisation organisations, consumer representatives have already been invited on three occasions to start discussing possible changes to the directive.

UNICE has clearly been kept aside from these discussions and we find this unacceptable.

Discussions on review of the directive between industry and consumer organisations are crucial before the Commission issues its proposal. The Commission has always supported UNICE's view about the usefulness of dialogue between industry and consumer organisations before any legislative proposal is tabled, and we believe that this is the ideal opportunity for the Commission to support its commitment to dialogue.

We understand that the Commission plans to consult industry in a written procedure when the above group has finished its work. We would urge you to reconsider this approach and associate UNICE with the activities of this working group as soon as possible and in any case before DG XXIV has thoroughly discussed possible changes to the directive. In this context, we hope to receive an invitation to the next meetings of this working group.

UNICE understands that, among the topics under discussion, the scope of the directive might be reviewed. We are confident that the Commission will carry out a cost-benefit analysis of the possible implications of the suggested changes before tabling any proposal.

We look forward to receiving your reactions to this.

Yours sincerely,

Dirk F. Hudig  
Secretary General

cc: Mr Horst Reichenbach, Director-General DG XXIV  
Mrs Marina Manfredi, Director DG XXIV/A