

UNICE

THE VOICE OF BUSINESS IN EUROPE

Mr Romano Prodi
President of the
European Commission
rue de la Loi, 200
B - 1049 Brussels

11 September 2003

THE PRESIDENT

Dear President,

re: Final phase of Commission's preparations regarding the chemicals legislative package

Further to the consultation organised via Internet, the Commission is preparing to make concrete choices for implementation of the REACH system, and to carry out the corresponding specific impact analysis work.

In the initial phases of the process of preparing the proposal, the impact of the new legislative proposals was considered above all from the angle of their direct effects on producers of chemicals, these effects being easier to identify. The scope and complexity of the potential effects on downstream users, i.e. virtually the whole of European industry, have only emerged in a more recent phase.

UNICE very strongly urges that an in-depth and rigorous evaluation is carried out, in particular concerning the effects of the proposed package on the major user sectors.

We have learnt that the phase for discussions with industry with a view to preparation of the legislative proposal has closed, since the Commission believes that it has collected the necessary information.

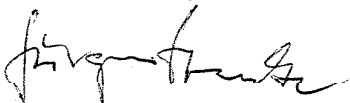
It seems clear to us, bearing in mind the importance of the issue and the number of comments submitted, that a consultation should be organised with organisations representing the companies and the sectors most affected on the practical elements under consideration within the Commission for incorporation in its final proposal.

In particular, this consultation should be an opportunity for all the sectoral and multi-sectoral organisations concerned to present whatever comments they deem useful on the methodology and the assumptions underlying the impact analyses currently in progress, and on the preliminary results that emerge.

I urge the Commission to take a decision along these lines, with a view to minimising the future impact on European industry. Such a dialogue can only be beneficial for good application of the future rules.

Thank you for the consideration you may give to this recommendation.

Yours sincerely,



Jürgen Strube