

THIS REQUEST IS MADE ON BEHALF OF ALL OUR MEMBERS



DEAR MEMBER OF THE EUROPEAN PARLIAMENT

YOU CAN VOTE FOR A SAFE REACH SYSTEM THAT WORKS FOR BOTH CONSUMERS AND ENTERPRISES.

TO DO SO, YOU CAN SUPPORT THE COUNCIL COMMON POSITION ON AUTHORISATION / SUBSTITUTION OF CERTAIN CHEMICALS WHICH IS A BALANCED SOLUTION AIMED AT ENHANCING HEALTH AND ENVIRONMENT WHILE ENCOURAGING INNOVATION AND COMPETITIVENESS. BASED ON THE CONCEPT OF ADEQUATE CONTROL OF RISK, THE COMMON POSITION IS ALREADY A COMPROMISE BETWEEN THE ORIGINAL COMMISSION PROPOSAL AND YOUR 1ST READING.

UNICE IS THE CONFEDERATION OF EUROPEAN BUSINESS, REPRESENTING MORE THAN 20 MILLION SMALL, MEDIUM AND LARGE COMPANIES.

**EUROPEAN PARLIAMENT 1ST READING
ON AUTHORISATION WITHIN REACH**

VERSUS

**COUNCIL COMMON POSITION ON AUTHORISATION WITHIN REACH
FAVOURED BY EUROPEAN ENTERPRISES**

- ❑ Substitutes have to be used regardless of adequate control of risk in current production processes
- ❑ Even if no alternatives are available, socio-economic benefits (outweighing risks) are not considered a sufficient criterion for granting an authorisation - as a consequence some substances would be banned without alternatives
- ❑ Authorisation is limited to a five-year period
- ❑ Authorisation is accompanied by a substitution plan

- ❑ Authorisation is granted if adequate control of risk is proved by companies and verified by the Agency / European Commission
- ❑ Authorisation is granted if socio-economic benefits outweigh the risk, until suitable alternatives become available. Socio-economic analysis is provided by companies, and verified by the Agency / European Commission
- ❑ Authorisation is reviewed regularly with a duration set on a case-by-case basis
- ❑ Authorisation is accompanied by an analysis of alternatives

The EP places disproportionate burdens on industry because:

- mandatory substitution does not take into account efforts by companies to secure adequate control of risk
- timeframes for substitution are too short
- Strict requirements will hamper potential for change and for developing innovative solutions
- European production will be disrupted with no automatic benefits for health and the environment

**INDUSTRY HAS SERIOUS CONCERNS ABOUT THE EP 1ST READING
ON AUTHORISATION**

The Council presents a flexible and balanced solution because:

- substitution is encouraged by a stepwise approach
- it will help industry to find smart and innovative solutions
- it fosters adaptation to change
- it takes into account the competitive environment faced daily by EU industry, and in particular by SMEs

**INDUSTRY ASKS YOU TO SUPPORT THE COUNCIL COMMON
POSITION ON AUTHORISATION**

