

Mrs. Elzbieta Bieńkowska
Commissioner for the Internal Market, Industry, Entrepreneurship and SMEs

Mr. Karmenu Vella,
Commissioner for Environment, Maritime Affairs and Fisheries
European Commission
200, Rue de la Loi
B-1040 Brussels

Brussels, 14th December 2017
 Prot. N° 357/GL

Dear Commissioner Bieńkowska,
 Dear Commissioner Vella,

As you know, we are quickly approaching the last registration deadline of the REACH-Regulation on 1st June 2018. The highest estimations predicted up to 70.000 individual substances that could be registered during the three deadlines. Later on, ECHA estimated that approximately 25.000 individual substances should be registered between 2013 and 2018. A very high number of the registrants should be SMEs.

First of all, we would like to thank you for the efforts that have been made in supporting SMEs during the last years and we are pleased that UEAPME had the opportunity to be part of this work. We are convinced that many actions improved the situation around REACH significantly. However, REACH proves more and more to be simply a too complicated piece of legislation to be implemented by an average SME. In combination with all other legal changes in the chemicals sector in the past years, this can prove to be a serious show-stopper for many enterprises. In this context, we feel supported by the growing number of official studies and reports recognizing this risk.

Today, we have all together slightly more than 17.000 registered substances. From those hardly 6.000 were registered between 2013 and today. That leaves us with a huge gap to the 25.000 substances that ECHA has estimated between 2013 and 2018. Every single substance can be crucial for hundreds or even thousands of enterprises in dependent production chains, which raises serious concerns among our constituency

Although we sincerely hope that REACH will be a success in 2018, we still have to express our deepest concerns that this will really be the case. While we recognize that the Directors' Contact Group is trying to build up a safety net, we are not sure this will be enough. In case we should be confronted with the fact that our substance-account on 1st June 2018 has a serious deficit, we will need a more serious fall-back position, which also takes into account that many enterprises did not register due to regulatory overload.

UEAPME may be the first stating this problem to you in such a clear way, but whatever goes wrong in the coming years, the enterprises we represent will be the most affected ones. Although we state this, as usual we are ready to support you within our possibilities to overcome the negative impact for our enterprises.

Kind regards,



Véronique Willems
 Secretary General

C.c.: First-vice President Timmermans, Executive Director Dancet