

Mr. Pier Luigi Gilibert
Chief Executive
European Investment Fund
37B, Avenue J.F. Kennedy,
2968 Luxembourg

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Dear Mr. Gilibert,

I would like to approach you with a very high and topical concern for SMEs in Europe: Many SMEs in Europe may need support by financial instruments to handle their REACH registration before May 2018. Indeed, the third and final deadline for registration of the REACH regulation is approaching. It will oblige to register all chemical substances put on the market between 1 and 100 tons per year, which are mainly manufactured by SMEs.

Since its entry into force in 2007 the REACH Regulation made the registration of more than 9,000 unique chemical substances obligatory. Moreover, it demanded to add over 130 substances to the candidate list of substances of very high concern for authorisation. REACH is, therefore, already one of the most complex legislative projects of the European Union and requires a lot of investments from SMEs to comply with it.

However, if SMEs do not comply and do not register their substances until the final deadline expires, they are no longer allowed to put these substances on the market. Bearing in mind that 99% of enterprises in Europe are SMEs, this could not only lead to a disruption of the supply chain but also slowdown growth in Europe. Furthermore, as the registration is an extremely expensive and complex system, the risk that SMEs will not have enough resources to go through the whole registration process - which can even last to more than one year – is real.

This is why I would like to ask you to keep these considerations in mind when the European Investment Fund decides about support of financial instruments provided by national intermediaries. If there is a request from national intermediaries to support a national scheme aiming to help SMEs to manage their REACH registration, we would like to ask the European Investment Fund to support such schemes either with COSME or EFSI resources. This would allow SMEs to stay on the market thus maintaining employment and growth in the EU.

Thank you in advance for considering this input.

Kind regards,



Peter Faross
 Secretary General