



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME

**Asks MEPs to take into consideration the concerns of SMEs in
view of their vote on REACH**

Second Reading in the Environment Committee

10th October 2006

In view of the vote of the Environment Committee of the European Parliament for the second reading of the REACH Regulation, UEAPME invites the MEPs to make the REACH regulation compatible with the capabilities of SMEs and asks MEPS to take into consideration the following priorities of SMEs:

UEAPME supports the following amendments:

- **Mr Sacconi's amendments 13, 16 and 17 on COST-SHARING**

UEAPME supports the introduction in the text of a system of proportional cost sharing, as voted by the Parliament in first Reading, and proposed by Sacconi's EP Recommendation. A mechanism to share equitably costs for tests is the only one, which does not discriminate small companies while ensuring a fair financial reward to producers.

- **Amendment 71 on the non-registration of owners of studies unwilling to share them**

The non-registration for owners who do not share their studies prevents excessive animal testing and ensures that the principle of compulsory access to data is complied with.

- **Amendment 73 on compulsory notification of non-registration of substances to the Agency**

The communication of non-registration to the agency provides both environmental and market benefits, as it facilitates information about substances available.

- **Amendment 119 on definition of quantity per year on basis of average production**

This system ensures that market fluctuations are taken into account for the registration

- **Amendment 127, 128, 129 on registration of monomers.**

The registration of monomers foreseen by the current Common Position is excessively burdensome and is unnecessary for the monomers reacted in polymers, which do not pose any environmental or health problem. The proposed amendments introduce an appropriate regime for monomers.

- **Amendment 168 on exceptions to compulsory data sharing**

The amendment ensures that the Agency evaluates the legitimacy of a request for opt-out from compulsory data sharing, thus providing an impartial assessment of all requests.

- **Amendment 200 on Registration of uses by SMEs to the Agency**

UEAPME considers the protection of specific uses of substances of the utmost importance for SMEs, whose competitive advantage often depends on the discovery and commercialisation of special uses for chemical substances. This amendment, empowering the European Agency and Member states to look for tests or commission them, avoids unnecessary duplication of tests and protects the industrial secrecy of companies while ensuring the protection of health and environment.

UEAPME strongly opposes the following amendments:

- **Amendment 156 introducing chemical safety assessment for substances below 10 tons**

SMEs producing such low quantities have not the financial means to prepare such assessment, which would have a negligible environmental benefit.

- **Amendments 169 and 171 postponing the liberalisation of test data from 10 to 15 years**

UEAPME believes that liberalisation should happen after 10 years, as this timing only can provide SMEs with the access to tests they need to survive in the market. The cession of data after 15 years represents an additional threat to the survival of SMEs, and unnecessarily contributes to reinforcing the dominant position of multinationals in the market.