



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's Position on the Globally Harmonised System (GHS)

UEAPME, the European craft and SME employers' organisation welcomes the introduction of a regulation on classification, labelling and packaging of substances and mixtures to implement the UN General Harmonisation System into EU legislation. The regulation will contribute to the protection of health and environment, while facilitating free circulation of goods both inside and outside the EU. The introduction of the GHS in the EU represents a crucial step towards the creation of a truly international system of labelling.

- UEAPME welcomes the result of the vote in the Environment Committee on the GHS Regulation, and expect the Parliament to defend its position when negotiating with the Council and the Commission. In particular, we **fully support the decision by the Environment Committee not to add any further requirements regarding labelling** that would make the European regulation substantially different from the GHS as implemented in the rest of the world, defying the aim of creating an international uniform and harmonized system of classification, labelling and packaging of substances and mixtures, and introducing additional barriers to trade.
- **UEAPME support the Environment Committee's decision to request that labels are substituted in no less than 12 months (amendment 76), although 36 months would be the necessary time for companies to update labels.**
- It also supports the Committee's decision to maintain the deadline of June 2015 for compliance to the regulation for mixtures (Art.58)
- However, we are concerned with the Environment Committee's decision to confine data protection exclusively to the non dangerous substances (amendments 56, and 61 to art.26-1). We believe that such decision is not necessary to protect health and safety, and would affect companies as it would affect industrial secrecy.

UEAPME thus asks the European Parliament to

- **Defend the decision to allow companies 12 months to update their labels in compliance with the new regulation (although 36 months would be necessary).**
- Confirm the decision to ensure the full compatibility and coherence between European Regulation and UN GHS with regards labelling and pictogram requirements.
- Confirm the decision to maintain the coherence between the regulation and the REACH Regulation (Am. 88 of ENVI report and Am 24 of IMCO opinion to art.41.1). More in detail, in the framework of the notification of classification and labelling (title XI REACH), UEAPME pleads for a threshold of 1 t/a in order to reduce bureaucratic burdens and costs for SMEs.

Brussels, June 2008