



Dear Member of the European Parliament,

On Wednesday 13 December you will be voting on REACH, the new European chemicals legislation. This will be the historic beginning of a comprehensive international system of chemicals regulation.

The International Chemical Secretariat collaborates with a number of European national and multinational companies using chemicals in their production. Companies which according to REACH-speak are *Downstream Users*. The Compromise package brokered by the Council of Ministers and the European Parliament through MEP Guido Sacconi largely fails to take the interests of these important parts of European industry into account.

Downstream users are professional users of chemicals, and importantly, handle articles containing chemicals. These companies will continue to face the challenges posed by hazardous chemicals. Information in the supply chain is in the Compromise limited to Substances of Very High Concern, such as Carcinogens, Mutagens and Reprotoxic Substances, but does not cover other substances classified as dangerous, such as allergens and sensitizers.

Further, the weak authorisation provisions in the Compromise means that downstream users will have to continue to handle Substance of Very High Concern, in spite of available less dangerous alternatives.

Therefore we urge you to strengthen the Compromise by supporting Amendment 178 on Article 7.2.b, Substances in articles.

This amendment clarifies that notification of Substances of Very High Concern in articles should apply to a homogenous part of an article, rather than the whole article.

- Without the clarification an uneven playing field will be created between EU and non-EU manufacturers, discriminating against EU businesses.
- The clarification will bring REACH in line with other EU legislation (e.g. RoHS, ELV).
- The clarification will improve the information requirements in REACH, working as an important tool to drive substitution.
- The amendment received overwhelming support in the Environment Committee Second Reading vote of REACH.
- The clarification enjoys support among several Member States in the Council, and should accordingly not jeopardise the implementation of REACH.

Kind regards,

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