

Association of Chemical Industry of the Czech Republic – SCHP ČR

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EE

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- **Conclusions of the „General Report on REACH“ (COMM, February 2013):**
 - **REACH Regulation works well and achieved the objectives expected after five years of operation.**
 - **EC does not propose changes to the REACH, but proposes ways to reduce the impact of REACH for SMEs: specific guidances for SMEs (transparency, non-discrimination and fair cost sharing in SIEFs, intellectual property,...), review of fees,...**
- **SCHP ČR agrees just partially with the conclusions of the Report and stresses a needed support for SMEs in the next registration deadlines. According to our survey 60 % of SMEs consider closing of their activity at the registration deadline.**

REACH review

- It can not be still decided whether REACH succeeds in its goal of enhancing competitiveness and innovation for the industry. Companies are paying the whole cost of dossiers, which the rest of the globe can then access for free.
- EC should continuously monitor the impact of REACH on competitiveness and innovation and assess other objectives of REACH.
- The new EC Regulation (EU) No 254/2013 on the fees and charges payable to ECHA: the registration fees is lowered for SMEs (35-95% reduction depending on the company size).
- SCHP ČR proposals to support SMEs: education and awareness rise, investments in R&D alternatives to SVHC substances, improvement of helpdesk, financed especially from state sources.
- Projects to support SMEs under preparation (Cefic, ...)

- Survey carried out by SCHP ČR among the member companies: (February 2013, 26 companies and 1 association participated): total costs spent on REACH implementation: more than 300 mil. CZK, expected costs (2 and 3 registration deadlines and authorisation): at least at the same level
- Alarming difference between „big“ and „small“ companies (SMEs)
- **Registration and authorisation costs make investments in R&D impossible.**
- SCHP ČR estimate: Czech chemical industry (CZ NACE 19.2, 20, 21, 22) will spend around 12 billion CZK on REACH implementation to 2020.

Project Monitoring REACH

Ordered by: MinENVI, Co-financed by Cohesion Funds EU

Performed by: ReachSpektrum Ltd (SCHP ČR).

Main goals:

- 1. Implementation assessment with a focus on SMEs and particular approach to education system, to possibilities of R&D sector to alternatives for SVHC**
- 2. Identification of main burdens and proposals for improvements**

Main results:

- 1. Different knowledge in companies – the best in chemical „big“ industry, the worst in downstream and small+micro.**
- 2. So far, costs for biggers smaller, for others higher. Further costs (2nd+3rd registration phase+authorization) highly difficult to assess !**
- 3. Impacts of REACH predicted rather negatively, decreasing the competitiveness – 60% of SMEs to close down when registration needed**
- 4. Public R&D sector overdosed by other targets – not able to react on chemicals replacement demands**

Thank you for your attention

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