



"REACHspeak" – and what it really means!

The latest developments have revealed the true meaning of many industry demands – they often mean exactly the opposite of what is commonly understood to be their meaning. Below a short dictionary:

"We fully support the objectives of REACH"

- We do not agree with any of the key parameters of REACH.
- You can be more destructive by pretending to be constructive.

"REACH has to be workable"

- Industry should do as little as possible (e.g. send in only available information for most of the substances, every additional demand should be as difficult as possible).
- Industry should decide what it has to do (e.g. risk-based waiving).
- This does not apply to the agency.

"REACH should be less bureaucratic"

That is why we ask for more bureaucracy – as the best way to avoid an effective system (e.g. agency to screen tens of thousands of dossiers to find out for which substances what most basic data is needed).

"REACH should be more targeted"

REACH should do a lot less (e.g. reduction of data requirements).

"REACH is too costly"

- We cannot afford to spend 2.5% of our annual R&D budget to establish basic data on our chemicals.
- This does not apply to the taxpayer: the more costly it is for the authorities to obtain data, the better, as it will reduce the authorities' requests for more (including for the most basic information).
- The benefits from improved protection of human health, especially that of workers, and the environment, are not our business.

"REACH will lead to the collapse of SMEs"

- We do not give a damn about SMEs and are happy to put as much burden on them as possible, but as others care about them, we better pretend we do so, too.
- We do not want to give downstream users – most of them SMEs – data about our chemicals.

"REACH will lead to the economically motivated withdrawal of 20-40% of chemicals, if not more"

- Simple scaremongering is better than facts - nobody will read or understand the KPMG study that showed - despite our financing it - that no important substances will disappear.
- Let us scare our customers so that they defend our business.

"We need a strong agency"

- First deprive Member States of all political responsibility to avoid restrictions.
- Then overload the chemicals agency with absurd tasks so that the whole system will collapse (e.g. screening of incomplete minimal data sets for up to 25,000 substances to establish for which of these substances minimal data is required after 12 or more years).

"Authorities should focus on substances of highest concern"

The agency should focus on substances of least concern, so that it will not be able to tackle our trouble chemicals (e.g. spend most of its time doing compliance checks on less than minimal data sets for small volume chemicals).