



EUROPEAN COMMISSION
 DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
 AND SMES
 Chemicals and Consumer Industries
REACH

Brussels, 31/03/2020
 GROW.D.1/AS
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Subject: Study on the Impacts of the REACH 2018 registration deadline on economic operators – Invitation to contribute in the consultation

Dear stakeholder,

The European Commission has contracted a study to better understand the impacts of the **REACH registration requirements in 2018**. According to the REACH Regulation, at the latest in May 2018, manufacturers and importers of chemical substances in the EU were required to submit information to the European Chemicals Agency (ECHA) on the properties and uses of all substances above 1 tonne per year. This can be burdensome for companies as those filing registrations under REACH have a number of commitments to fulfil in order to comply – both when registering individually or as a member of a Joint Submission.

Consultants from **Wood**, together with partners from **Milieu Consulting SPRL** and **Peter Fisk Associates Brussels**, have been contracted by DG GROW to:

- Assess and quantify the impacts, both costs and benefits, on companies of the REACH 2018 registration;
- Identify the main drivers behind impacts, as well as key challenges for companies;
- Evaluate structural changes on the EU chemicals market resulting from the REACH 2018 registration;
- Quantify costs for companies when updating registrations or extended Safety Data Sheets;
- Assess the effects and cost drivers of the communication obligations under REACH for downstream users;
- Describe the pricing policies of Substance Information Exchange Fora (SIEF) and assess their affordability for different types of companies;
- Assess the resources spent by companies on adaptation to REACH, including the availability of qualified persons to deal with REACH within the company or resorting to outsourced staff.

The study will provide the European Commission with evidence and analysis that will support future evaluations of REACH. Therefore, the collection of data and information is a critical part of the study and a wide range of stakeholders will be invited to contribute

in order to obtain evidence-based information of the impacts of the REACH 2018 registration.

In view of the above, I highly encourage you to participate in the consultations and I appreciate your cooperation in order to help the consultants deliver a high-quality study.

Remember that this is an opportunity for you to:

- Influence a study seeking to advance the understanding of REACH registration impacts on businesses, including on your operations, financial position, access to market and competition;
- Inform the European Commission of the challenges and benefits for your sector, e.g. cost barriers, or other difficulties you may face due to REACH;
- Engage in ongoing discussions about REACH registration that could lead to improved cost effectiveness in EU chemical legislation in the future;
- Have your say on what is required to enhance the cost-effectiveness of REACH.

I therefore kindly request your cooperation by helping the consultants to collect information and evidence for the study. You can do this by either complete an online survey, submit your comments in writing, or agree to be interviewed. The consultation process is expected to last until the end of summer 2020.

Yours sincerely,

e-signed

Michael Flüh
Head of Unit