Joint Position of the Social Partners of the European Chemical Industry

the European Chemical Employers Group (ECEG),
also representing the European Chemical Industry Council (Cefic)
AND
the European Mine, Chemical and Energy Workers Federation (EMCEF)

REACH: Safety and Workability

The Partners of the Social Dialogue within the Chemical Industry, the European Mine, Chemicals and Energy Workers Federation (EMCEF) and the European Chemical Employers Group (ECEG) – member of the Cefic family (the European Council of the Chemical Industry) – have jointly monitored the public discussion about REACH and developed already several common positions about REACH (see appendix) in the earlier stage of this process. The Council has worked out a compromise at the end of the first reading that not only has taken the earlier inputs of the Commission and the European Parliament into consideration but could also pave the way for a safe and workable risk management and authorisation system. All European institutions, especially the European Parliament, the EU Commission and the EU Presidencies of the past years have made enormous efforts to finally agree on a workable regulation and the Social Partners of the Chemical Industry would very much like to honour this work.

Having already made substantial achievements in its Social Dialogue about safehandling and use of hazardous substances with specific em-
phasis on occupational health and safety in its chemical manufacturing processes, the partners emphasize the fair balance between regulatory and institutional framework conditions of existing workers safety legislation and the engagement of the involved parties to constantly improve the safe handling of chemicals. The excellent results of this joint process encourages the Social Dialogue partners to propose an active exchange of experiences with education, information, training and prevention methods to downstream industries working with chemicals. They will therefore invite the representatives of these industries to meet with them and work out the best ways to share good practices in production and use of chemicals.

The REACH regulation addresses manufacturing and use of chemical substances themselves and will provide a system for the registration of all and the authorisation of chemicals of high concern in Europe. The Social Partners reiterate their postulation for the system to remain balanced, efficient in delivering safety to all workers and users and workable, avoiding bureaucracy that would put at risk the future of the Chemical Industry in Europe.

Especially the authorisation procedure should use processes employed within the Chemical Industry, which analyse the relevant use and exposure patterns of substances and lead to substitution if the substance cannot be handled safely. A workable authorisation process should propose substitution when risk cannot be adequately controlled by proper management, where an alternative substance exists and social and economic conditions allow. Substitution being the overarching scheme to ban substances of high concern without considering all solutions is delivering any benefits to neither society nor business. Substitution is part of the history of chemicals but it is a complex process that involves all actors in the supply chain and cannot succeed without numerous conditions. REACH could in this way contribute to promote research and development and new activities that would create sustainable jobs in the chemical sector.

The social partners call therefore legislators to give priority in the second reading to the main objectives of REACH, health and environment, by combining safety and workability and to confirm the results achieved so far in the Council's political agreement in order to make REACH a success.

Krakow, 26th October 2006
**ECEG** – being an independent federation within the Cefic family of organisations representing the European Chemical Industry in many areas – was founded in 2002 and groups at present 21 national Chemical Industry employers federation from as many European countries. ECEG represents the interests of the Chemical Industry on EU level in social and employment affairs and within the European Sector Social Dialogue Committee.

**EMCEF** – the European Mine, Chemical and Energy Workers’ Federation comprises 2.5 Million blue and white collar workers in 35 European countries and 131 national trade unions. It is a member of the ETUC and was founded in 1996.

In 2004 the EU Commission, DG Employment, Social Affairs and Equal Opportunities founded on request of ECEG and EMCEF the Sector Dialogue Committee of the Chemical Industry and confirmed the status of ECEG and EMCEF as the representative Social Partners for the European Chemical Industry.

**Contact details**

**European Chemical Employers Group (ECEG)**

Rue du Commerce 31  
1000 Brussels  
T +32 2 2908970,  
F +32 2 2908974  
Email secretariat@eceg.org

**European Mine, Chemical and Energy Workers Federation (EMCEF)**

Avenue Emile de Béco 109  
1050 Brussels  
T +32 2 6262180,  
F +32 2 6460685  
Email info@emcef.org