

Impact of REACH on single market and competitiveness: the SME perspective



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UEAPME represents SMEs in Europe

- European Association of craft, small and medium sized enterprises
- Umbrella organization for unions of SMEs
- Represents interests of European crafts, trades and SMEs
- 84 member organisations
- National cross-sectorial SME federations
- European branch federations
- Associate members
- More than 12 million enterprises (50 million people)

Costs of REACH regulation

- pre-registration, registration and communication cost
 - final estimation €1.06-2.15 billion (nearly estimation for 11years)
 - SIEF
 - high information workload
 - substance identity
 - letter of access €5000-10000 more than € 10000
 - same price for every tonnage band
 - ➔ fair, transparent and non discriminatory
 - SDS and eSDS
 - workable and readable



Costs of REACH regulation

- Human resources
 - REACH unit
 - often impossible for SMEs
 - one person responsible for all legal obligations
 - external consultants
 - for all REACH related activities
 - ➔ additional high cost
 - expected evolution of costs in the future
 - more testes needed
 - lesser SIEF members to share the costs
 - higher involvement of SMEs ⇒ 8% annual turnover



Effectiveness of REACH

- Impact on trade
 - manufactures and importers of article
- support mechanism
 - helpdesk
 - translation of guidance's and IT-Tools
- Impact on financial situation
- Impact on prices
- Access to chemicals
- Market surveillance / enforcement



Conclusion and recommendations

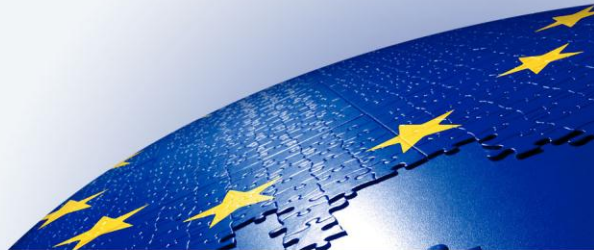
- no changes of the regulation needed
 - clarification
 - best practice examples (SIEF, SDS and eSDS)
- helpdesk or compliance center for SMEs
- for 2013 and 2018 registration
 - guidance's (in a Nutshell) and IT-tools on time
- maybe a benefit in future
 - improved knowledge on uses and properties on chemicals
 - supply chain communication
- more burden than a benefit for SMEs





Thank you for your attention

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