

**Text on Transparency**

***Cefic, the European Chemical Industry Council, welcomes the EU Commission Green Paper on the “European Transparency Initiative” and signs up to the proposed principles. It aims to contribute in a positive way to the consultation process by answering the questions that are the most relevant to its mission and activities, especially those under chapter II “Transparency and Interest representation” and chapter III on “Minimum Standards for Consultation”.***

***Cefic will be happy to answer any further queries the European Commission may have on the present submission, which may be regarded as a public document.***

***Cefic underlines that it participates in this consultation process as the trade association representing the chemical industry in Europe and as a non profit organisation under Belgian law. For companies which develop on their own advocacy activities vis-à-vis the European institutions, the transparency rules have to be adapted and take into consideration business sensitive information e.g. on projects, investments, research & development, budgets and so on.***

**CHAPTER II - In your view, has the Commission applied the general principles and minimum standards for consultation in a satisfactory manner?**

In principle yes. However, a period of 8 weeks seems too short when the consultation relates to complex and voluminous dossiers (holiday periods should not of course be considered as part of the consultation time).

In the case of REACH, it was almost impossible to properly consult all members of Cefic, as these are either national associations or companies, which again are members of national associations. For European trade associations it takes at least one month more to get meaningful feedback and input from all their constituencies.

Spending more time on proper consultation should contribute to more comprehensive and informed views from all stakeholders, adding to the workability aspect of future legislation.

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