

Warsaw, 13 December 2006

## **STATEMENT BY POLAND**

Poland is supporting the compromise solutions for the REACH package in a spirit of compromise.

Poland wishes to emphasise that the proposed provisions have not completely allayed fears that the competitiveness of the chemical industry and other industries in the EU countries may suffer.

Of particular concern are the new requirements regarding submission of a compulsory substitution plan (where safer alternatives are available) and preparation of an analysis of possible alternatives, whereby entrepreneurs applying for an authorisation to manufacture, import or use substances must draw up an analysis of the possibility of using substitutes in place of particularly dangerous substances. Provisions of this type can put small and medium-sized undertakings at a disadvantage. These firms may not be in a position to carry out such assessments, inter alia on economic grounds, or for lack of suitable personnel (specialists). In addition, extending the protection period for data necessary for registration from 10 to 12 years may in practice prove disadvantageous to Member States with developing economies. This change may serve to protect the economic interests and perpetuate the predominance of powerful concerns both in the EU and beyond.