

FECC  
European Ass. Chemical Distributors  
Rue du Luxembourg 16B  
1000 Brussels  
Belgium

11 December 2007

**Re: FECC comments on the Technical Guidance Document (TGD) for preparing the chemical safety assessment (RIP 3.2)**

Dear Member of the REACH Competent Authorities,

Following the circulation of the draft guidance on preparing the Chemical Safety Report (RIP 3.2-2) and the invitation to provide comments on issues of major concern, the European Association of Chemical Distributors (FECC) would like to bring to your attention the following.

FECC is concerned that the proposed Use Descriptor (UD) system seems to have failed to take into account the work of the Arona network, particularly the main conclusions that were presented at the workshop in Brussels on 30-31 August 2007. At this meeting the outcomes of the industry trials were discussed. Most of the trials showed that the proposed system was too complex, produced unrepeatable results and was in need of refinement. Mr. Fabrice Delhaise, FECC representative in the RIP 3.2, already proposed such refinement to the Stakeholder Expert Group (SEG) before the meeting in October.

In view of the above, FECC would like to propose again a simplification of the UD system. FECC suggests to reduce the number of UD to three categories: Use, Process and Article. Moreover, the number of entries for each of the categories should be limited. Many SMEs throughout Europe will have to work with this system. Having a simple system is the only way to manage the communication in the supply chain in a workable manner.

FECC therefore urges the REACH CA to consider the proposed simplification in order to achieve an effective and practical system of Use Descriptors. Please find enclosed a more detailed FECC proposal.

Yours sincerely,

Hendrik Abma  
Director General

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*The European Association of Chemical Distributors (FECC) represents around 1,200 European chemical distributors to the EU Institutions. FECC Members – most of them SMEs - create value in the supply chain meeting the demands of over one million downstream users with a large range of products. FECC Members distribute and regularly import substances and preparations vital for the success of the European economy. FECC Members are committed to comply with REACH and facilitate the information flow and dialogue between suppliers and downstream users.*

