

European Association of Chemical Distributors (FECC)  
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Ms. Cristina de Avila  
DG Environment  
European Commission  
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*Brussels, 13 May 2008*

**Re: review of Annexes IV and V**

Dear Ms de Avila,

I am writing to express the concerns of the European Association of Chemical Distributors (FECC) regarding the on-going review of the Annexes IV and V of the REACH Regulation. These are as follows:

- FECC shares the industry's concerns regarding the outcome of the review process by the contractor, particularly the rejection of all the proposals for addition of new substances to Annex IV and the need for a common sense approach.
- FECC disagrees with the acceptance of the proposals for deletion for Carbon and Graphite. The situation of nano-particles in REACH needs broad discussion with all stakeholders.
- FECC is mostly concerned about the lack of certainty for companies: one month before the start of the pre-registration period, there is no confirmation on the substances that will be exempted. FECC urges the European Commission to clarify the timing of the review process as soon as possible.

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. Thousands of industrial plants are supplied with the specific chemicals that are required to continue their production.*

