

CheMI

European Platform for Chemicals Using Manufacturing Industries

MANIFESTO

June 2024

CheMI was established in 2003 as the platform for downstream users of chemical substances or mixtures across manufacturing industries. CheMI works as a communication channel for producers of articles, materials, components or consumer goods to voice perspectives, concerns and to contribute to the successful implementation of REACH.

The members are associations of industries which in total account for over 300.000 European companies, 3 million employees, and generate a turnover of € 500 billion; the members support the EU ambition to continuously improve the regulatory framework on chemicals.

CheMI members call on the EU legislators to:

1. Consider the impact on downstream users when regulating chemicals

We call for policy makers to consider the legislation impact on downstream users in particularly on manufacturing industries. This can be achieved by performing **comprehensive impact assessments** involving the entire value chain, and by setting workable **transitional periods** for companies to anticipate and implement the changes.

2. Enhance market surveillance for fair competition

Our industries **invest** substantially to be compliant with the EU regulatory framework on chemicals including REACH restrictions. CheMI calls for improvement of Market Surveillance in the EU to ensure that imported products enter the EU market only if they are fully compliant with chemical legislation. Strengthening market surveillance in the EU is necessary for a **level playing field**, notably: *“To better protect EU consumers against unfair practices and harmful products, the EU and the Member States should step up joint enforcement in particular of EU product safety rules”*.¹

3. Set as priority the competitiveness of European companies

The **competitiveness** of European industries should be placed at the core of the EU strategy for the coming years with a view to build and strengthen the strategic resilience of European industry. The Antwerp Declaration calls for *“a comprehensive action plan to elevate competitiveness as strategic priority and create the conditions for a stronger business case in Europe”*.²

4. Foster better regulation

CheMI members support legislation which is evidence-based, scientifically sound, targeted and effective. Duplicated and overlapping requirements as well as complex rules should be avoided to **alleviate unnecessary burdens** for companies, in particular SMEs. We call on the **inclusion of all stakeholders of the value chain** in developing impact assessments on new legislation, or in preparing secondary legislation and guidance for law implementation.

¹ *“Much More than a Market” G. Letta, April 2024 Report commissioned to Mr. Letta on the “Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens”*

² www.antwerp-declaration.eu

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List of signatories



AFERA – The European Adhesive Tape Association



AQC - Association pour l'assurance qualité des fabricants de bracelets cuir



CEC - European Footwear Confederation



CITPA – International Confederation of Paper and Board Converters in Europe



COTANCE – European Leather Association



ECMA – European Carton Makers Association



EDANA - the voice of nonwovens



ETRMA – European Tyre and Rubber Manufacturers Association

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EURATEX – European Apparel and Textile Confederation



FEPE - Federation for envelopes and for light and ecommerce packaging in Europe



FEPF - European Federation of Ceramic Table- and Ornamentalware



FPE - Flexible Packaging Europe



FINAT - International association for the European label industry



INTERGRAF – Association for the printing industry



MPE – Metal Packaging Europe