

Industry statement on ECHA REF-4 REACH-EN-FORCE project press statement

1 March 2018

The undersigned industry associations fully support smart market surveillance and welcome ECHA's enforcement projects. Safety rules are meaningless without effective enforcement.

However, we would like to express our disappointment with the recent ECHA press statement on the REF-4 REACH-EN-FORCE project, which reported a high number of non-compliances among tested products, such as childcare articles, leather goods and toys. We believe it is important to highlight that the enforcement actions were targeted and the outcomes are not representative for the EU market of those products. Unfortunately, on this occasion, the report and accompanying statement published by ECHA were unnecessarily alarming.

As a result, reputable manufacturers and retailers are penalised twice. Firstly, cheated by unfair competition from rogue traders bringing non-compliant products to the market. Secondly, through the negative press attention and lack of clarification that safe products can be purchased from reputable players.

With this in mind, we would welcome a clarification on ECHA's website to explain that there is no need for consumers to worry unnecessarily: reputable companies invest time and resources to make sure the products they put on the market are safe. In addition, we would recommend that future communications reflect the challenges faced by reputable manufacturers who play by the rules.

CEC is the European umbrella organisation representing the major national **footwear associations in EU**. CEC's objective is to boost the competitiveness and sustainable growth of the sector by promoting its interests and values, supporting research and innovation, engaging on education and attracting new generations. The EU footwear sector is composed of 230.000 companies that directly employ almost 300.000 people, and generate an annual turnover of 27 billion Euro.

COTANCE, the Confederation of National Associations of Tanners and Dressers of the European Community, is the representative body of Europe's leather producing industry. European leather is made in nearly all EU member States by about 3000 micro, small and medium sized factories, employing directly some 30.000 people and generating an annual turnover of some 8 billion Euro.

The European Nursery Products Confederation (ENPC) is a trade association for childcare product manufacturers in Europe. It is composed of national associations representing small and medium-size enterprises (SMEs) and large companies playing a key role in the European single market. ENPC was established in May 2011 in Brussels with the aim of speaking with a united voice and guaranteeing an active participation of its members in European policy developments.

Toy Industries of Europe (TIE) is the trade association for the European toy industry. The toy industry is highly international and is one of the most dynamic business sectors in Europe. Over 99% of the sector is composed of small and medium sized enterprises (SMEs), which have less than 50 employees. Members of TIE include corporate companies as well as national associations from Bulgaria, Denmark, France, Germany, Italy, the Netherlands, Spain, Sweden and the UK.