

EUROPEAN UNION - Delegation to the State of Israel

האיחוד האירופי - המשלחת למדינת ישראל

الأتحاد الأوروبي – البعثة الي دولة اسرائيل

Ambassador / Head of Delegation

Ramat Gan, 15 November 2017

For the attention of

Mr Amit Lang, Director General, Ministry of Economy and Industry of Israel

Mr Moshe Bar Siman Tov, Director General, Ministry of Health of Israel

Mr Yisrael Dancziger, Director General, Ministry of Environment of Israel

Subject: Final REACH registration deadline 31 May 2018

Dear Colleagues,

I am writing to draw your attention to the final date for registering chemical substances under the EU chemicals legislation REACH: 31 May 2018. After that date, substances produced or imported in quantities reaching one tonne or more per year per manufacturer or importer that are not registered with the European Chemicals Agency (ECHA) can no longer be placed on the EU market. To assist companies in Israel who export to the European Economic Area (EEA), we would like you to request your guidance to ensure that this information reaches all local stakeholders concerned.

As a context let me recall that non-EU companies are affected by REACH if they export chemicals to the EEA in quantities of more than 1 tonne per year. Non-EU companies that export to the EU cannot register substances themselves, but their EU-based importers must do that. To complete the registration dossier, the EU-importer will need detailed information on the composition and the properties of the chemical substance, which will need to be provided by the non-EU company. Alternatively, the non-EU company can also appoint a so-called "Only Representative", who must be based in the EU, to submit the registration on his behalf. In both cases, the non-EU company must be prepared to provide the information that is required for the registration. Companies that need to register the same substance must share data and related costs and submit most of the information jointly.

As you may be aware, REACH which was adopted in December 2006 and in the meantime has become a global benchmark for comprehensive regulation on chemicals, reversed the

burden of proof on the safe use of chemicals. It is now up to companies to demonstrate that the chemicals they manufacture or import in the EU can be used safely and do not cause unacceptable risk to human health and to the environment. The companies' findings and conclusions are recorded in a registration dossier that is submitted to ECHA.

The information in the registration dossiers is used for further regulatory processes and published on the ECHA's website. This helps European and non-EU companies, authorities and citizens to make informed decisions on chemicals they use or that they may be exposed to.

Let me take this opportunity to stress that in our view beyond the obvious interest for Israeli exporters to comply with these requirements the adoption and implementation of a REACH-like comprehensive regulatory framework in Israel would help to further environment and health related objectives in the country and would be in line with the Israeli Government's indication upon acceding to the OECD in 2010.

The EU remains at your disposal to this end.

Yours sincerely,

Emanuele Giaufret

<u>Cc</u>: Mr Elie Groner, Director General, Prime Minister Office Mr Shai Babad, Director General, Ministry of Finance