



Federation of German Industries · 11053 Berlin, Germany

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General

Mr Bjorn Hansen  
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ECHA

*Date*  
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Dear Mr Hansen,

Overcoming the corona crisis requires the mobilisation of all energies and resources in European companies. Production in German and European industry is an essential factor in overcoming the crisis. In many cases, companies are in an exceptional situation due to the participation of employees in crisis teams or imposed quarantine.

Therefore, we highly welcome the fact that ECHA has announced to handle some processes flexibly (e.g. payment of invoices) and to enhance deadlines (e.g. granting 30 additional days to comment on ECHA's draft decisions). In order to avoid further burdens on companies in the current situation and to enable a faster recovery of the economy and society, we urgently ask you to extend this regulation on further processes in the field of chemical regulations (e.g. stakeholder consultations).

As a well-founded evaluation and assessment of reports and proposals is not possible and necessary preparations cannot be implemented (e.g. for the SCIP-Database) in the current situation due to a lack of capacity in the companies, we urge you to postpone the deadlines of the following ongoing processes by at least 6 months:

- **Implementation of the SCIP-Database:**  
In the current economic and political situation resulting from the corona virus epidemic, many investments in companies are reduced. This has a massive impact on the implementation of the requirements of the SCIP database, since this requires, for example, investments in internal company systems and structures
- **Inclusion of PFOA (Perfluorooctanoic acid etc) into the Persistent Organic Pollutants Directive ((EU) 2019/1021)**  
Due to the corona epidemic there are considerable delays in the supply chain, so that components in stock must be used longer than planned.
- **PCN-Notification according to Annex VI to CLP**
- **CLP-Consultations**

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- **Consultations on the Recommendation for inclusion in the authorisation list**
- **Consultations Identification of substances of very high concern (e.g. resorcinol)**
- **Calls for comments and evidence (restrictions and OEL)**
- **Consultations on restriction proposals**
- **Consultations on testing proposals**
- **Consultations on opinions of RAC and SEAC regarding ongoing restriction processes (e.g. skin sensitizers, microplastics)**

Furthermore, we would like to ask you to start new procedures at a later date or to postpone the envisaged deadlines by at least 6 months (e.g. restriction of PFHxA).

We would be pleased if you could consider our concerns regarding the postponement of deadlines under chemicals legislation in order to support companies in this difficult situation.

We have also sent an identical letter to DG ENVI (Mr Sadauskas) and DG GROW (Mr. Pettinelli).

Yours sincerely,

*Signed by Holger Lösch*