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Director-General

*Minister
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Your Excellencies,

Thank you for your letters of 3 July to President Barroso, Vice-President Verheugen, Commissioner Dimas and myself. In accordance with our internal Commission procedures, I am replying on their behalf too.

We very much welcome your commitment to improving the workability of REACH and your willingness to cooperate to this end with other stakeholders and the European Commission in the necessary practical preparations. We agree with you that the various groups working on draft Technical Guidance Documents in the various REACH Implementation Projects (RIPs) should be as inclusive as possible, covering expert input from all relevant stakeholders. However you will understand that full account should also be taken of the practical constraints on the size of those groups, and on the number and duration of commenting rounds.

In a broader context I would like to draw your attention to the fact that two years ago the European Commission set up the so-called "Commission Working Group on the Practical Preparations for REACH" (CWG) that oversees the work being carried out under the Commission Interim Strategy for Implementation of REACH. The CWG consists of representatives of the EU Member States, of Commission services, and a large number of stakeholder observers. It is through the CWG that the experts participating in the various Stakeholder Expert Groups (SEGs), that monitor the development of the RIPs, are appointed. The Commission decides on the formation of the SEGs based on the nominations received from the CWG members and on considerations regarding coverage of expertise and different types of stakeholders and the size of the groups. Until now, however, all nominations have been accepted.

Given the central role of the CWG in the RIPs and your wish to have a "single access point", we would like to propose that you jointly nominate one single observer to the CWG on your behalf. This would correspond with the observers of the EU industry

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