

Challenges for SMEs

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Challenges for SMEs



- **UEAPME represents SMEs in Europe**
- Members are organizations
- High number of sectors covered
- Small structures
- One general dissemination approach impossible
- High workload within one company
- Overburdened with legal obligations
- Language problems

UEAPME represents SMEs in Europe



- Umbrella organization for unions of SMEs
 - Represents interests of European crafts, trades and SMEs
 - 84 member organisations
 - National cross-sectorial SME federations
 - European branch federations
 - Associate members
 - More than 12 million enterprises (50 million people)
- Complex communication and dissemination of information
- Information-tools as ECHA-homepage essential for us**

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Members are organizations



- Different structures
 - Different cultural background
 - Different languages
 - Different core areas
 - Different communication and dissemination tools
- **Guidance documents and other information provided by ECHA essential tools for every-days work and further information of member companies**

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High number of sectors covered



- Most important sectors are:
 - Construction, Foodstuffs, Healthcare, Services, Transport, Cosmetics
- Through national unions also deeply involved in:
 - Metals, Chemicals, all kinds of articles, plastics...
- High number of different interests under REACH
- Focus on many different aspects of REACH
- Knowledge and awareness very inhomogeneous within our members

→ A standardized information strategy almost impossible

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Small structures



- Most of our companies have a size from 5 to 50 employees
 - Average business volume per company ~0.5 to 10 mio. € a year
 - Regional activity
 - Mostly downstream user or distributors
 - Some Importers and manufacturers in smaller scales
 - No specific chemical-management established
- **Good and short information important**
- **languages of high importance**

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One general dissemination approach impossible



- 84 member organizations, 84 solutions
 - Two examples
 - Austrian approach
 - Slovenian approach

Austrian approach



- Industry-helpdesk
- Training of trainers
- Roadshows and workshops
- Newsletter
- Homepage
- Folder and guidance
- Translations TGD 's
- International cooperation

→ ECHA-HP used by bigger companies

→ SME ask for sector-structured information in their own language

2-level-concept for DU-information

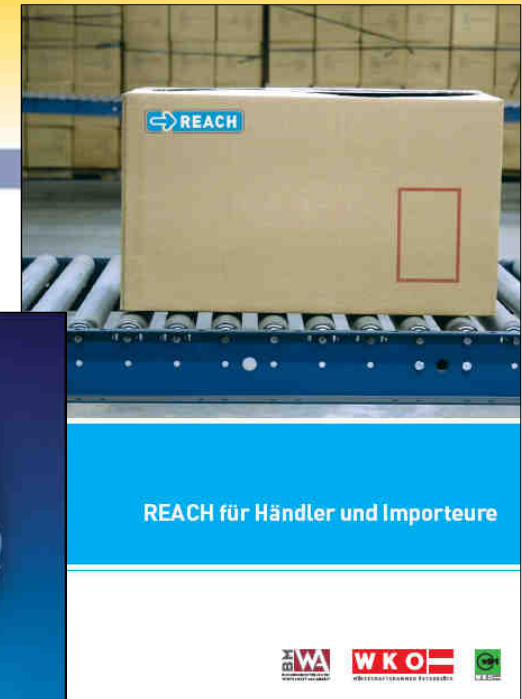
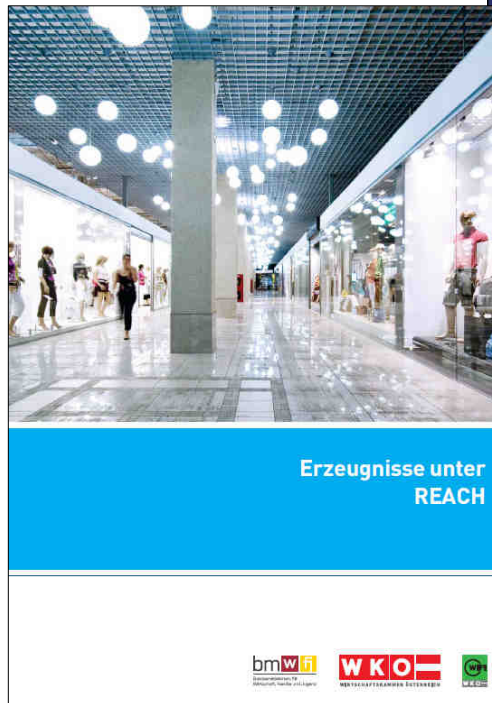
- level 1 - overall part on DU
 - 15 questions
 - basics, safety data sheet
 - very short (6 pages)
 - simple text without legal phrases
- level 2 - information for specific branches
 - based on level 1
 - for specific branches
 - text-modules
 - what means REACH for eg. a carpenter
 - what are uses, substances etc. for eg. a carpenter
 - what is important for eg. a carpenter



Austrian approach

Special topics brief on 6 pages

- import and distribution
- recycling
- articles



Slovenian approach



- Roadshow and workshops
- “Self-help” group REACH for potential registrants
- Homepage based on a lot of ECHA-information (translated)
- International cooperation

→ SME depend on structured information in their own language

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High workload within one company



- Pre-registration and corresponding work
- Working in SIEF
- Working and negotiating in/with Consortia
- Information in the supply chain
- Elaborating of a registration-dossier
- Other legal obligations (waste, water, work-safety, taxes etc.)

... and often only 5-10 employees

→ No time to study hundreds of pages Guidance documents

→ No time and resources to cope with everything relevant

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Overburdened with legal obligations



- REACH is a very complex piece of legislation
 - Other legislation has to be considered
 - No scientific background on eg. testing of substances
 - No background on legal aspects concerning consortia
 - No background on competition law
 - In SIEF SMEs are confronted with numerous obligations
 - ... BUT awareness about rights in SIEF/consortia is very low
 - One person is often responsible for REACH
 - ... AND everything else
 - CA-Helpdesks are often too unconcrete with their answers or are not trained in relevant aspects
- External help needed - additional costs**

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- REACH-IT available only in English
 - Simple administration work can be only done by a better qualified English-speaking employee
 - Legally problematic (EC-regulation No. 1)
 - Certain modules are essential (eg. C&L-Inventory)
- Guidance translated slow
- ECHA-Homepage only partial in all community-languages
- English in SIEF acceptable as lingua franca, BUT:
 - Understanding of technical and legal text difficult or impossible (eg. REACH-IT, Guidance, Homepage, CLP Ann VI)

→ Significant competitive disadvantage compared to large companies

Conclusion



- Many of our member organizations are overburdened
- Many of our member companies are even more overburdened
- We need easier, shorter and more problem-specific guidance
- We need more concrete and practical help from our Helpdesks
- We need all relevant REACH-supporting-tools in all our languages on time



Thank you for your attention!!!



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