

19 December 2012

Dear -,

In 2012, the American Chamber of Commerce to the European Union (AmCham EU) organised a meeting with you to establish a dialogue on REACH related issues that have raised some concerns amongst our membership.

On that occasion, AmCham EU welcomed the opportunity to discuss polycyclic aromatic hydrocarbons (PAHs). AmCham EU would like to emphasise that PAHs are not substances that are intentionally added in products. PAHs are created during the production of certain raw materials, particularly when high temperatures are involved, for example burning. It is also well known that PAHs can be found in barbequed food, roasted coffee and vegetable oil for cooking as a result of exposure to high temperatures.

During our meeting we expressed our concern that the policy debate on PAHs, as set by the original German proposal, was driven by emotion and political motivation. We were troubled by the precedent that was being set by such a wide-ranging restriction proposal being pushed through on the basis of article 68.2, and without going through the REACH risk assessment procedure.

The European Commission recently submitted a revised proposal to restrict PAHs. While the revised proposal does not address all the issues we raised, it is based on a more rigorous and proportionate approach and is therefore a step in the right direction.

AmCham EU supports the European Commission's approach on PAHs and will continue to engage with relevant stakeholders on some of the details. AmCham EU would therefore welcome your cooperation, and that of your peers in other Member States.

Yours sincerely,



Meglana Mihova