



27 July 2010

Dear Ms. Lajava,

With reference to your e-mail of the 7th of May 2010 regarding "ECHA request your cooperation in activating downstream users".

We wish to advise you that the Automotive Industry is actively engaged in contacting high risk suppliers with the aim of bringing to their attention the necessity of registration so as to avoid supply chain disruption.

The automotive industry has therefore developed a letter which is intended to be used initially by vehicle manufacturers and tier one suppliers and which is generic. It therefore does not include substance names.

Every attempt will be made to secure supply of substances and preparations. But remember the complexity of our products and the length of our supply chain which is not only many tiers deep but also global. Furthermore, the supply chain does not always disclose all substances present in their preparation due to confidentiality. For this reason we as downstream-users do not have the possibility to control if all our substances are registered by the supplier for our use. Consequently, satisfying your request would mean to list all substances used in our products and production, which would be many thousands.

While we appreciate the ECHA initiative we wish to refrain from sending you a list of high risk substances because such a list would not be exhaustive.

Yours sincerely,

Timo Unger  
(on behalf of the above mentioned associations)