

Ms Ilze Juhansone  
Secretary General  
European Commission  
Brussels,

9 April 2020

Dear Ms Juhansone,

I am writing to you to request a discussion, where possible at short notice, regarding the potential extension of deadlines for public consultations.

The growing COVID-19 crisis is having an unprecedented impact on every segment of the European economy, including the European Tyre and Rubber industry.

All manufacturers of tyres and rubber products supplying the automotive sector in the EU have shut down their operations for at least two to twelve weeks and several hundred thousand employees are on temporary short-working conditions or not allowed to work at all, depending on national employment measures. Core production functions of our member companies are severely impacted. R&D and many technical and supporting departments like those dealing with regulations and (lab) testing departments are shut down or have significantly reduced their workforce. At this time, we do not know if that will be it, or if such measures will have to be extended further.

This significantly limits the ability of our association to consult our member companies and to consolidate their expert views on critical files that are currently under discussion. These files concern chemicals and restrictions proposals, regulatory, environment and H&S files.

We would therefore kindly request that deadlines of current consultations and questionnaires of the European Commission and its executive agencies, ECHA in particular, that affect our industry be postponed by at least two months and that the planning of future consultations be revised accordingly.

We appreciate that several consultation deadlines have already been postponed on an ad-hoc basis. However, the severity of the crisis in our view justifies a more general and holistic approach.

Counting on your support and action,

Yours sincerely,



Fazilet Cinaralp  
Secretary General