

**KLG/ITSSD Principal's Published WTO Analysis of  
EU REACH Regulation Prompts Invitation & Participation at  
Brussels Symposium Convened by  
German University/Institute/Federal Environment Agency (UBA)**

REACH in (imported) articles: Slides

Julian Schenten [schenten@sofia-darmstadt.de]

Sent: 10/13/14 3:24 am

To: johanna.wurbs@uba.de, Prof.\_Dr.\_Martin\_Führ\_, 'Andreas Hermann',  
D.Bunke@oeko.de

Attachments:

REACH\_articles-2014-10-09\_UBA.pdf  
REACH\_articles-2014-10-09\_ECHA(public).pdf  
REACH\_articles-2014-10-09\_sofia.pdf

Dear participant,

We thank you for your attendance and contributions to vivid discussions at the workshop  
"Strengthening REACH Provisions Concerning (Imported) Articles".

Attached you will find the presentation slides.

If you have any further comments on the project draft report, please feel free to submit your  
thoughts by answering to this email until 24 October.

Kind regards,  
Julian Schenten

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Graduate in Information Law  
Assistant of the Editorial Board of the elni Review  
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## Workshop: Articles in REACH - October 9 / project report + final agenda

Julian Schenten [[schenten@sofia-darmstadt.de](mailto:schenten@sofia-darmstadt.de)]

Sent: 9/25/14 6:27 am

To: [schenten@sofia-darmstadt.de](mailto:schenten@sofia-darmstadt.de)

Attachments:

Report\_(Imported) articles in REACH (DRAFT)\_2014\_09\_25.pdf  
REACH articles, Agenda\_2014\_09\_25.pdf

Dear participant,

Attached you will find a DRAFT version of the project report which will be the basis for discussion at the Workshop „Strengthening REACH Provisions Concerning (Imported) Articles” as well as the final agenda.

Please give us a short notice if you are interested in the German draft version of the report.

Looking forward to meet you on October 9 in Brussels.

Kind regards,  
Julian Schenten

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Graduate in Information Law  
Assistant of the Editorial Board of the elni Review  
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RE: AW: statement: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels]

lkogan@koganlawgroup.com [lkogan@koganlawgroup.com]

Sent: 9/2/14 7:55 am

To: Julian Schenten

Cc: 'Prof.\_Dr.\_Martin\_Führ\_', 'Ursula Henske'

Dear Dr. Schenten,

I would be pleased to confirm my attendance at your October event, and appreciate your confirmation of UBA additional funding for my transatlantic airfare and hotel costs.

Please keep the reservation you have made on my behalf at the Wellness Apart Hotel, and I shall promptly secure airline tickets guaranteeing arrival on Wednesday, October 8 and departure on Friday, October 10.

Since I am likely to have questions concerning the draft version of the final project report, I will likely follow up with you and Dr. Fuhr no later than one week.

I look forward to meeting you all.

Best Regards,

Lawrence Kogan

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AW: statement: Policy Workshop REACH Regulation and SVHC  
in imported articles in Brussels]

Julian Schenten [[schenten@sofia-darmstadt.de](mailto:schenten@sofia-darmstadt.de)]

Sent: 9/1/14 3:45 pm

To: [lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com)

Cc: 'Prof.\_Dr.\_Martin\_Führ\_', 'Ursula Henske'

Attachments:

REACH articles, DRAFT Agenda\_2014\_08\_21.pdf  
(Imported) articles in REACH\_Draft.pdf

Dear Mr Kogan,

We are pleased to inform you that the Federal Environment Agency (UBA) confirmed additional funding for your transatlantic airfare and hotel costs.

The amount of the budget is **1.550 €** (incl. VAT).

Presuming the UBA's affirmative answer, I have permitted myself to book a hotel room for you nearby the workshop place (Wellness Apart Hotel, Rue Des Palais 108 Schaarbeek, Schaerbeek Brussels, 1030). Please feel free to use that reservation; it's 2 nights (8 October until 10 October, incl. breakfast) for **134 €**. If you are not going to use the reservation, please inform me so I can cancel it.

If you accept the hotel reservation 1.416 € will remain for you to book transatlantic airfare.

Please note that we will need the original receipts to organize the reimbursement.  
Please also note that reimbursement of any other expenses (cab, dinner etc.) will not be possible.

Finally, please accept our apologies for the delayed answer and please confirm, soonest possible, whether you will be able to attend the workshop and make the statement.

Attached you'll find the current agenda as well as a draft version of the final project report that you can use to prepare the statement.

Best regards,  
Julian Schenten

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RE: statement: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels]

lkogan@koganlawgroup.com [lkogan@koganlawgroup.com]

Sent: 8/5/14 8:39 am

To: Prof.\_Dr.\_Martin\_Führ\_

Cc: 'Julian Schenten', Ursula Henske

Dear Dr. Fuhr,

Thank you for responding to my phone inquiry with Ms. Henske of Friday, August 1.

I appreciate your clarification of the scope of the project presentation which has been extended from 5 minutes to 10 minutes.

I am pleased to hear that, notwithstanding the delayed response from the German Federal Environment Agency to your request for additional funding, you remain confident that such funding will, ultimately, be provided.

I understand the further budget limitations within which you are working, and look forward to hearing from you, soonest, upon the UBA's approval of payment of my transatlantic airfare and hotel costs.

Best Regards,

Lawrence Kogan

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statement: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels]

Prof. Dr. Martin Führ [[fuehr@sofia-darmstadt.de](mailto:fuehr@sofia-darmstadt.de)]

Sent: 8/1/14 10:35 am

To: [lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com)

Cc: 'Julian Schenten', Ursula Henske

Dear Mr. Kogan,

unfortunately we have no final response from the Federal Environment Agency to our request for additional funding to cover your travel expenses.

Based on the informal signals we are quite confident that we get a positive answer.

Thus we would still very pleased to welcome you at the workshop and learn from your experience and views (Additional funding, however, is not within the scope of the research project). A brief response to the findings of the study (not longer than 10 minutes, no slides needed) will address regulators from the European Commission and several governments from all over Europe as well as various stakeholders.

Kind regards

Martin Führ

Prof. Dr. Martin Führ  
Society for Institutional Analysis - sofia  
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RE: statement: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels

lkogan@koganlawgroup.com [lkogan@koganlawgroup.com]

Sent: 7/18/14 2:39 pm

To: Prof.\_Dr.\_Martin\_Führ\_

Cc: 'Julian Schenten', 'Ursula Henske'

Dear Dr. Fuhr,

I appreciate your patience in this matter, about which I have given much thought.

Please be aware that, from a professional viewpoint and in consideration of the importance of the subject matter to be discussed in the workshop, the professional canons to which I am subject do not permit, even in a causal setting, my speaking about such substantive issues without having first conducted an in-depth analysis of this subject matter, especially given its potential political ramifications.

In circumstances like these with which we are familiar, it is customary to provide to a client a formal written opinion that assesses the viability of the proposed action or initiative and possible alternatives.

Such an undertaking, professionally speaking, is always fairly compensated, which I am pleased to discuss with you.

It would be good for you and I to address this issue, sooner rather than later. This would enable each of us to proceed forward in our daily affairs, and would allow me to concentrate on the production of the opinion letter and to adequately prepare my presentation based on it.

In all candor, and to assist in meeting your objectives, it is my belief that the brief period of time (5 minutes) allotted may be counterproductive by its limits and might be expanded to at least 10 minutes to permit the transmission of more than mere commentary.

I look forward to discussing this with you; perhaps we should speak by telephone.

Cordially,

Lawrence Kogan

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Re: statement: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels

Prof. Dr. Martin Führ [[fuehr@sofia-darmstadt.de](mailto:fuehr@sofia-darmstadt.de)]

Sent: 7/17/14 4:01 am

To: [lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com)

Cc: 'Julian Schenten', 'Ursula Henske'

Attachments:

REACH articles, Invitation.pdf  
REACH articles, DRAFT Agenda.pdf  
REACH articles, Directions.pdf

Dear Mr. Kogan,

will it be possible for you to make a statement (5 minutes, no slides needed) on the legal appraisal (WTO-conformity of expansion of REACH authorization to SVHC in imported articles) at the workshop? You will receive a draft version of the final project report in due time before the workshop.

We expect the final decision of the UBA on the funding of your travel expenses in the next weeks.

Kind regards

Martin Führ

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RE: Invitation: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels

lkogan@koganlawgroup.com [lkogan@koganlawgroup.com]

Sent: 7/10/14 1:33 pm

To: Prof.\_Dr.\_Martin\_Führ\_

Dear Dr. Fuhr,

I would be pleased to attend and participate in the October 9 Policy Workshop in Brussels if you are able to secure funding for my transatlantic airfare and hotel costs.

Sincerely,

Lawrence Kogan

Lawrence A. Kogan, Esq.  
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Invitation: Policy Workshop REACH Regulation and SVHC in imported articles in Brussels

Prof. Dr. Martin Führ [[fuehr@sofia-darmstadt.de](mailto:fuehr@sofia-darmstadt.de)]

Sent: 7/10/14 7:56 am

To: lkogan@koganlawgroup.com, info@koganlawgroup.com, info@itssd.org

Cc: 'Julian Schenten'

Dear Lawrence Kogan,

The research project “Strengthening the Provisions Concerning (Imported) Articles in the REACH Regulation”, carried out by the [Society for Institutional Analysis \(sofia\)](#) together with Oeko Institut on behalf of the German Federal Environment Agency (UBA), investigates, how modifications of the REACH Regulation can contribute to better protection of human health and the environment against impacts caused by substances of very high concern (SVHC) in articles. The project examines modifications within the current regulatory framework as well as the creation of new legal instruments that could play a role in the next comprehensive review of the REACH Regulation in 2019.

The project includes a legal appraisal analyzing the WTO conformity of an expansion of the REACH provisions concerning authorisation of SVHC to those substances present in articles imported from countries outside the EEA. Additionally, the project focuses on the utility and feasibility of certain possibilities to optimize information and communication on such articles.

Against this background, we would like to invite you to a

**Policy Workshop on October 9, 9:30 – 15:30 at Université Saint-Louis in Brussels, Belgium.**

The workshop serves the purpose to discuss project findings with representatives from politics, science and practice.

At the moment we are discussing with the UBA, whether we can apply for additional funding to pay for transatlantic airfare and hotel costs. Thus, we need to know if you would kindly accept our invitation and attend our workshop in October.

I am looking forward to your answer.

Yours sincerely

Martin Führ

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