

Consequences of EU REACH Authorisation of Lead

Lisa ALLEN, Senior Regulatory Affairs Manager, ILA
22 June 2023



WHAT IS REACH AUTHORISATION?

EU regulatory process designed to “*progressively replace Substances of Very High Concern*” (SVHCs) by *suitable alternative substances or technologies where economically and technically viable*”

Inclusion of a substance in **REACH Annex XIV** means that:

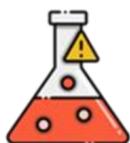
- A **transition period** will apply
- Companies need to **apply to the European Commission** and be granted permission to continue use
 - **No suitable alternative** substance or technology available, *and*
 - **Research and development** plan in place to identify suitable alternative, *and*
 - Positive **socio-economic cost-benefit**
- Authorisation is **time-limited**: companies need to reapply
- Articles made **outside the EU** can still be imported, unless restricted



Authorisation listing applies **regulatory pressure** on continued use of a substance. It **increases uncertainty** and risk for downstream users

- Designed to **stimulate substitution and innovation**: identify alternative substances in processes or use an alternative technology that does not contain the SVHC

REGULATORY PROCESS – AND STATUS OF LEAD



Step 1

Substances of very high concern (SVHC)

- Registry of SVHC intentions until outcome
- Preparing the SVHC dossier
- Public consultation
- Adding substances to the Candidate List



Step 2

Recommendation for inclusion in the Authorisation List

- Prioritisation
- Draft recommendation
- Consultation
- ECHA MSC opinion
- ECHA Recommendation for inclusion in the Authorisation List

Pb metal & 11 Pb compounds now at same point in REACH Authorisation process



Step 3

Inclusion in REACH Annex XIV

- Commission draft regulation
- Interservice consultation
- REACH Committee vote
- Scrutiny by European Parliament and Council
- Regulation amending Annex XIV published



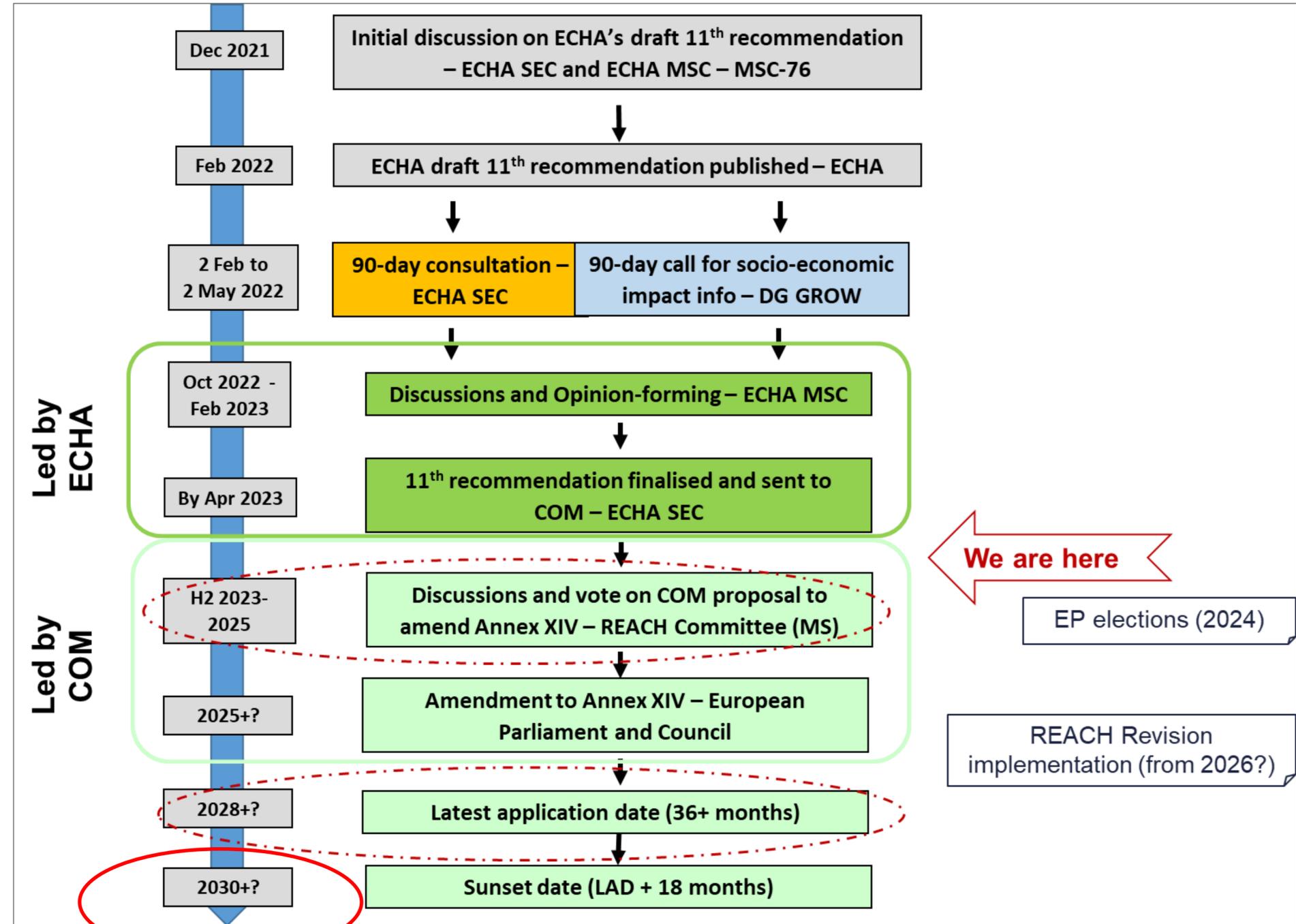
Step 4

Application for Authorisation

- Application for Authorisation
- Public consultation
- RAC and SEAC opinions
- Commission decision (REACH Committee vote)
- Implementation
- Review report, if wishing to renew Authorisation

POTENTIAL TIMELINE FOR LEAD – AND THE BIGGER PICTURE

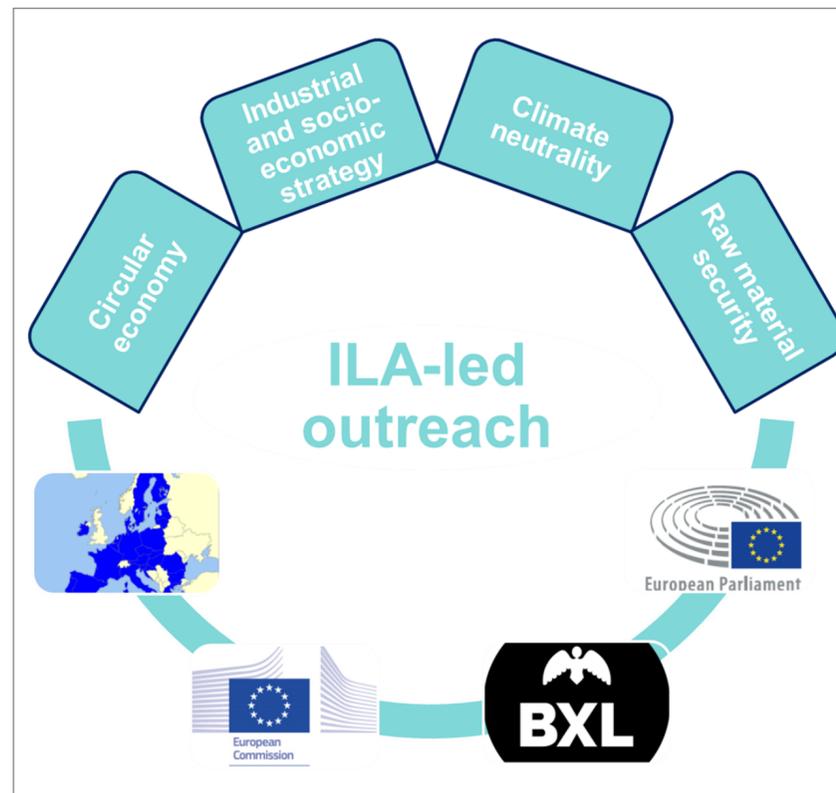
- ECHA Recommendation issued to European Commission April 2023
- REACH Revision tabled 2H 2023
- European Parliament elections 1H 2024
- Influence of geopolitical events
- Supply chain security
- Raw materials supply and demand



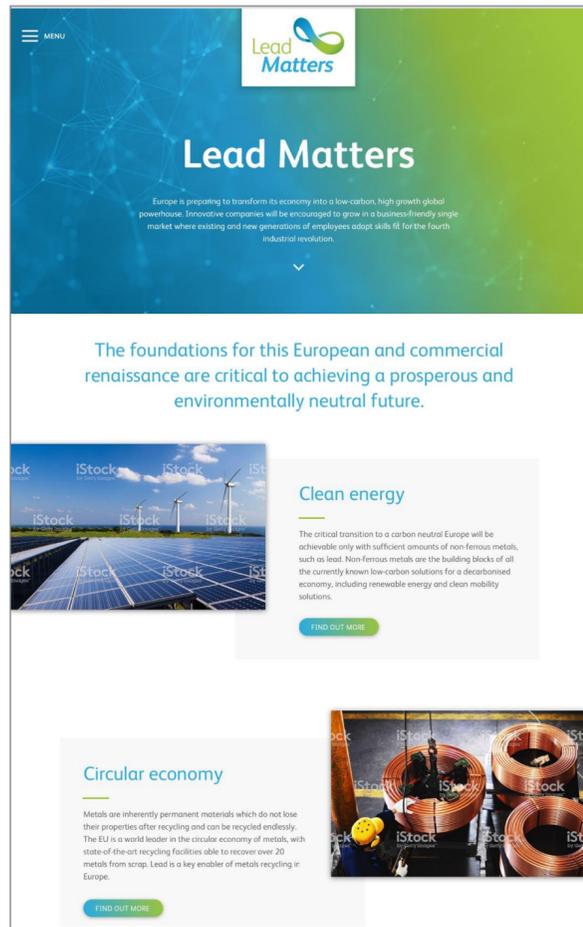
INDUSTRY'S RESPONSE TO THE CHALLENGE

Aim: Lead metal is **not** included in REACH Annex XIV

- Adoption of alternative risk management measures that **do not negatively impact battery and other critical uses**, ensuring policymakers:
 - Recognise the **societal and economic benefits** of a **strategically autonomous, key raw material**
 - Work with Industry to identify and use **more effective and proportionate measures**
 - Appreciate the **unprecedented number of Applications** for Authorisation that would be submitted




The image shows two pages of a document. The top page is the cover page, featuring the logos of the International Lead Association and the Lead REACH Consortium. The title is "STATEMENT FOLLOWING ECHA 11TH RECOMMENDATION". The bottom page contains the text of the statement. It begins with a paragraph discussing the consequences of including lead metal in REACH Annex XIV, stating that it would result in an unprecedented number of applications for authorization. It then argues that including lead metal in the list would be a disproportionate risk management measure. The statement concludes with a call to action for the Commission to reject ECHA's recommendation. Below the text is a grid of logos for various industry members, including A.M., WVMETALLE, GLENCORE, ECODOT, and many others. The bottom of the page includes contact information and page numbers.



Lead Matters

Europe is preparing to transform its economy into a low-carbon, high growth global powerhouse. Innovative companies will be encouraged to grow in a business-friendly single market where existing and new generations of employees adopt skills fit for the fourth industrial revolution.

The foundations for this European and commercial renaissance are critical to achieving a prosperous and environmentally neutral future.

Clean energy

The critical transition to a carbon neutral Europe will be achievable only with sufficient amounts of non-ferrous metals, such as lead. Non-ferrous metals are the building blocks of all the currently known low-carbon solutions for a decarbonised economy, including renewable energy and clean mobility solutions.

Circular economy

Metals are inherently permanent materials which do not lose their properties after recycling and can be recycled endlessly. The EU is a world leader in the circular economy of metals, with state-of-the-art recycling facilities able to recover over 20 metals from scrap. Lead is a key enabler of metals recycling in Europe.



Lead's infinite role in European metal recycling industry

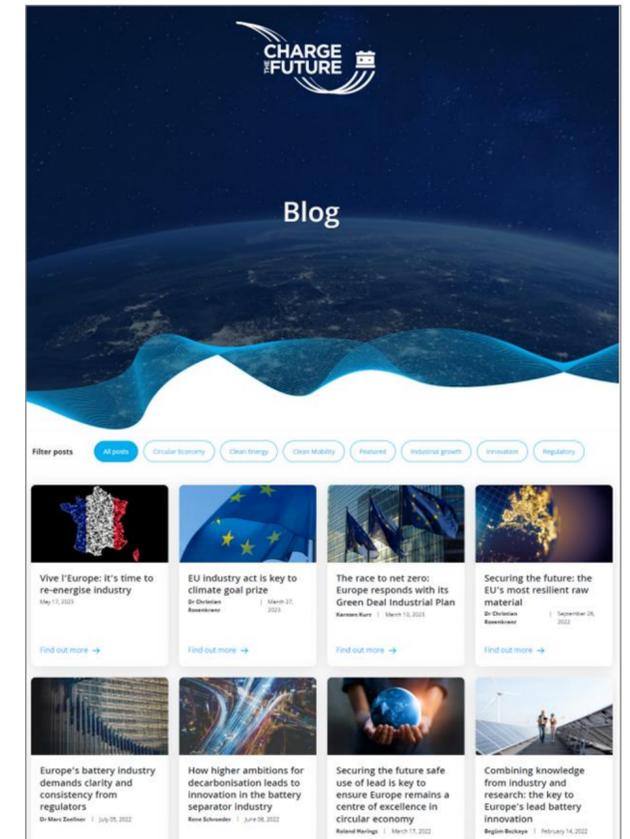
Internally lead-sheathed cables are fuelling the surge in wind power

Lead providing uninterrupted power

The importance of lead in the economics of solar

Fact file

For Europe's future, lead matters.



CHARGE THE FUTURE

Blog

Filter posts: All posts, Circular economy, Clean energy, Clean mobility, Finance, Industrial growth, Innovation, Regulatory

- Vive l'Europe: It's time to re-energise industry
- EU Industry act is key to climate goal prize
- The race to net zero: Europe responds with its Green Deal Industrial Plan
- Securing the future: the EU's most resilient raw material
- Europe's battery industry demands clarity and consistency from regulators
- How higher ambitions for decarbonisation leads to innovation in the battery separator industry
- Securing the future safe use of lead is key to ensure Europe remains a centre of excellence in circular economy
- Combining knowledge from industry and research: the key to Europe's lead battery innovation



Lead is an essential metal supporting clean energy

Lead: the essential metal supporting clean energy



Lead batteries enable an energy-efficient, decarbonised transport sector

With vehicles representing more than 30% of final energy consumption in Europe, the transition to an energy-efficient, decarbonised transport sector is central to achieving Europe's climate change targets. The publication of the EU's Energy Union Strategy in 2015 provided a framework for multiple subsequent EU policies and initiatives to deliver transport decarbonisation for Europe. Lead batteries are a critical to achieving this ambitious target.

As the technology behind clean cars, micro-hybrid vehicles, lead batteries are delivering up to 10% CO₂ savings in a highly cost-effective manner. In fact, they are an essential element to power a wide range of clean mobility solutions, from electric vehicles (EVs) and can also be installed in EV charging stations to improve their efficiency.

They also support the energy storage and distribution network, storing the renewable energy that will power the future.

Through their extensive use in electric forklift trucks and other industrial vehicles, lead batteries are also supporting e-mobility in vehicles.

The policy context

The 2015 Energy Union Strategy identified the transition to an energy-efficient, decarbonised transport sector as a key area for action. The package of measures that followed in 2016 described the target of moving towards decarbonised vehicles, supporting further improvements to internal combustion engine vehicles and an accelerated transition towards low and zero-emission vehicles.

Since then, three Europe On the Move packages and accompanying legislative initiatives have outlined a long-term plan to deliver clean, affordable, competitive mobility for all Europeans. They set ambitious average CO₂ emissions targets for new cars and vans that are 30% lower in 2030, compared to 2021. For most truck types an emissions target of 100g CO₂/km and 100g CO₂/km compared to 2019.

Europe on the Move II also introduced a Strategic Action Plan on batteries, focused on the challenge of developing sustainable Europe-based battery value chains to power the transition.

How lead batteries support the transition to an energy-efficient, decarbonised transport sector

Lead batteries are key to the shift to sustainable, low-emission transport systems, supporting innovation, energy efficiency and decarbonisation, all of which are essential to achieving the EU's climate goals.

One of the most cost-effective ways to yield fuel savings and reduce CO₂ emissions is to start with the engine. Lead batteries support the transition to more efficient engines by providing the power needed to start the car, to run the alternator, and to power the air conditioning system when the car is idling or in low-speed operation.

In 2020, a European-led consortium of 100+ companies in the EU will be responsible for the new car market will be dominated by those using this technology combined with regenerative braking, which allows the car to store energy in the battery when the car is decelerating, reducing the amount of energy that needs to be supplied by the engine.



International Lead Association
2,176 followers
1d •

Fact of the day: over 90% of the global Uninterrupted Power Supply (UPS) market uses #lead #batteries. Computers, telecommunications platforms, and data centres rely on UPS to function continuously. More here: <https://bit.ly/3mevlvp>



Charge The Future @ChargeTheFuture · 5h

As we mark @mobilityweek, clean transport and power solutions are important now more than ever. #Lead #batteries play a crucial role in enabling #cleanmobility and motive power applications. Karsten Kurz, @ExideTech expands on #ChargeTheFuture: bit.ly/3zb5uMR

Karsten Kurz
Director of Environmental Affairs Europe, Exide Technologies



EURACTIV The Capitals The Brief Ukraine

Home Opinions Energy & Environment European Chemicals Agency Targets Critical Battery Raw Material

European Chemicals Agency Targets Critical Battery Raw Material

DISCLAIMER: All opinions in this column reflect the views of the author(s), not of EURACTIV Media network.

Promoted content

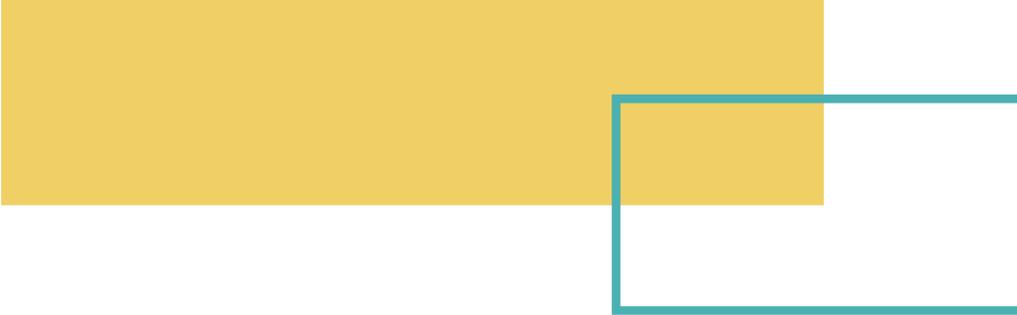
By International Lead Association

Supporters

From Twitter

ILA_lead @ILA_lead

This regulatory action will deliver little additional benefits in reducing risk but will create a good deal of business uncertainty - reducing investments in Europe and impeding strategic planning, policy goals and decision-making. #CircularEconomy

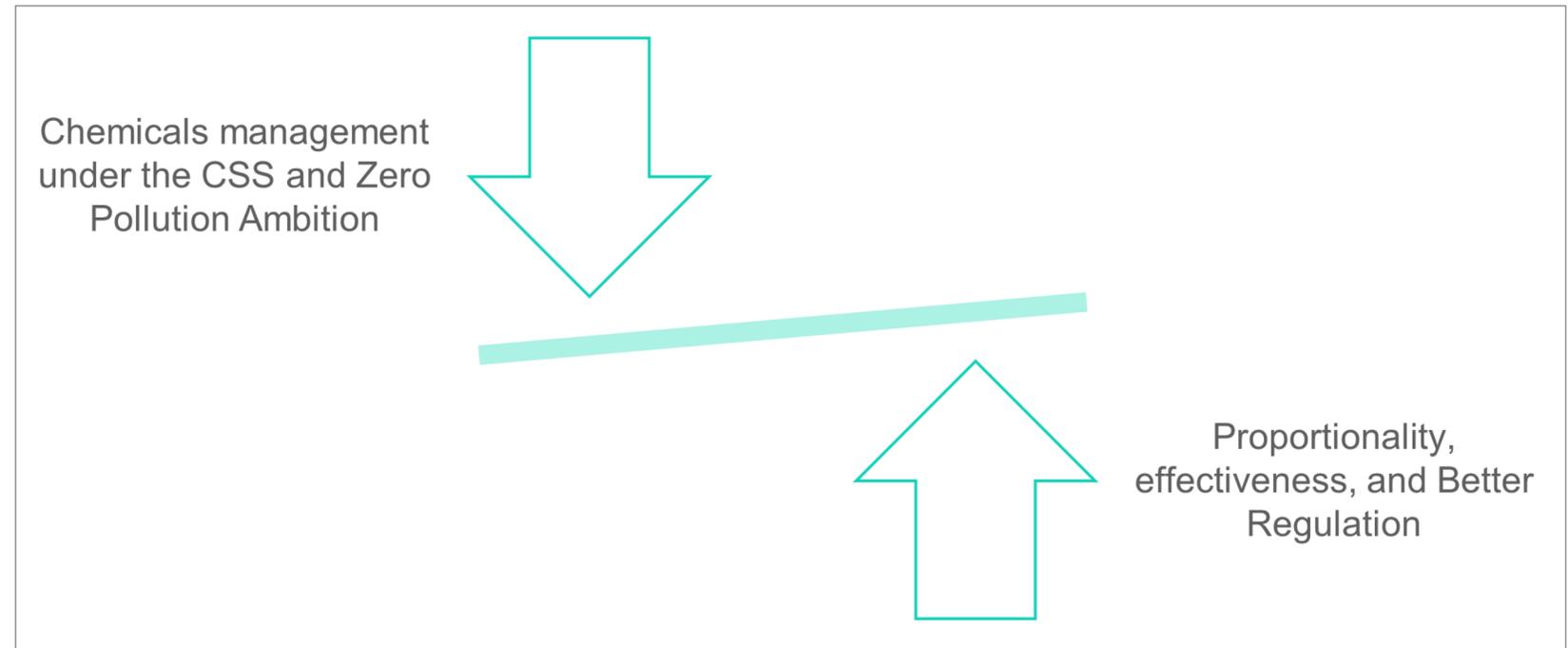


Pb

2023 JUNE
21-23

WHAT'S THE
OUTLOOK?

- Reassurance – **for now** – but no certainty
- Once recommended, always eligible
- Under constant review
 - Political climate post-election
 - Changes via REACH Revision
 - Member State and Commission activity
- Maintain watching brief
- Continue to educate and inform
- Ready to act further where needed



WHY ECHA'S RECOMMENDATION SHOULD BE REJECTED?

We believe the Commission should reject ECHA's recommendation to include lead metal in the REACH Authorisation List because it would:

- 1. Hamper the EU's ability to achieve key policy objectives, including climate change goals as well as supporting strategically autonomous and essential industrial infrastructure**
- 2. Reduce Europe's resilience to geopolitical events by increasing its reliance on Third Countries with lower environmental and social standards*
- 3. Threaten skilled jobs and future growth opportunities across multiple Member States**
- 4. Lack proportionality given the existing framework of legislation and ongoing reviews*
- 5. Result in thousands of Applications for Authorisation without benefit to human health**
- 6. Stifle innovation and long-term investment in the EU, even in applications with good growth potential*



Thank You!



International Lead Association:

www.ila-lead.org/

Twitter: @ila_lead

LinkedIn: International Lead Association



Charge the Future:

www.chargethefuture.org/

Twitter: @ChargeTheFuture

LinkedIn: Charge the Future



Lead Matters:

www.leadmatters.org/