

T&D Europe response to REACH revision consultation

Executive Summary

T&D Europe welcomes and supports the revision of European Union legislation on registration, evaluation, authorisation and restriction of chemicals (REACH Regulation). The members of T&D Europe, major downstream users, are fully committed to reducing the content of hazardous substances in their products to support a more circular economy.

Regarding the core aspect of the future implementation of the authorisation and the restriction process, T&D Europe seeks a level-playing field between EU actors and actors from other regions, a workable possibility for exemptions and continued application of the risk-based approach to regulating chemicals.

Based on the response to the Commission's public consultation, T&D Europe would like to highlight the following:

- Under the three main options identified for the upcoming REACH reform, T&D Europe calls for the policy option 2 “Merging the authorization and the restriction processes” under REACH. The policy option 2 would allow industry to continue manufacturing products with chemicals while maintaining a level playing field. Exemption processes would nevertheless have to be clarified under option 2, similarly as is suggested under option 1 ‘Keeping the authorisation process, with clarification and simplifications’.
- T&D Europe opposes the shift to a hazard-based approach through extending the generic risk management approach and introducing an essential use concept, as we see the risk-based approach as a more suitable scientific approach to substance regulation.
- T&D Europe also calls for a clarification on the proposed essential use concept, and to avoid a disproportionate administrative burden for industry. The essential use concept should be applied in limited and specific cases, where no other means of risk management are appropriate to deal with a certain risk.

T&D Europe believes that further improving REACH can be achieved in line with a well-functioning Internal Market, without imposing extensive regulatory burdens for industry under the roof of the Chemicals Strategy for Sustainability (CSS).

To this end, T&D Europe calls on the European Commission to prioritise better enforcement of existing legislation and apply subsidiarity and proportionality according to the Better Regulation principles.

T&D Europe is the European association of the electricity transmission and distribution equipment and services industry. Our scope includes the complete range of products and services necessary to transmit and distribute electricity in high and medium voltages, between the producers and the end users. T&D Europe members provide all types of smart grid technologies, including advanced, smart systems suitable for interaction with renewable energies and ICT. The companies represented by T&D Europe account for a production worth over €25 billion and employ over 200,000 people in Europe.