

**The Restriction of Hazardous Substances (RoHS) directive has proven effective since its inception: Europacable calls for its principles to be maintained, whether as such or within the framework of the REACH regulation.**

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Europacable, the voice of Europe's wire and cable industry, calls on the European Commission to maintain the principles of the RoHS directive which has proven its effectiveness to control the use of hazardous substances in the manufacturing of electrical and electronic equipment. Europacable welcomes the ongoing revision process as launched by the European Commission as a key opportunity to further explain the interaction with other pieces of EU legislation either through non-legislative measures or the incorporation of the RoHS provisions into the REACH regulation.

Europacable is committed to empower Europe's electrification and digitalization: a European-based production of power and communication cables will be key to achieve climate neutrality by 2050 as well as the 2030 connectivity targets. Cables must provide the maximum safety for European users, as well as an optimal response to the Union's targets for continued reduction of pollution. Today, Europe's cable manufacturers are global technology leaders, complying with the existing rules on substances, and pro-actively researching solutions to further reduce hazards.

The European wire and cable industry considers the RoHS directive as an effective tool for the restriction of hazardous substances in electrical equipment. Restricting defined hazardous substances with highest relevance to electrical equipment has been a key success factor of this directive. This, together with clear and straightforward provisions – easily understandable by all enterprises, including small companies and undertakings located outside the EU, have contributed to the international flagship function of the RoHS directive.

Europacable welcomes the opportunity to provide its feedback to the ongoing revision of the RoHS directive and outlines its preference for two of the five options proposed by the European Commission:

- **Option 1: Maintain the RoHS directive as it stands** and introduce certain non-legislative measures, such as an update of the RoHS FAQ document. This would include explaining the interaction with other legislation such as the REACH regulation and the proposed Ecodesign for Sustainable Products (ESPR) regulation;
- **Option 4: Repeal the RoHS directive and incorporate its provisions into the REACH regulation.**

In both cases, Europacable sees the opportunity to maintain the principles of a well-performing piece of legislation, whilst providing the necessary updates to a text that has been alive for the last two decades. It would also allow for the clarification of the relation between RoHS and REACH, removing potential areas of confusion and overlap between the two pieces of EU legislation.

On the contrary, Europacable considers the other options for revision as less favourable to harness the benefits of the existing directive, and to update its key aspects in line with the

Green Deal objectives. In addition, Europacable would like to draw the Commission's attention on the risk of multiplying pieces of legislation, adding complexity for stakeholders especially when small and/or based outside the EU. In this respect, the integration of the current provisions of RoHS into a wider scope such as the ESPR would also add complexity whilst creating the risk to dilute the benefits of the current legislation.

We call on the European Commission to take the Europacable input into consideration, and look forward to working with its services and other key European stakeholders for an efficient and effective review of the RoHS directive.

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#### **About Europacable**

Europacable AISBL is the voice of all leading European wire and cable producers. Europacable members include the largest cable makers in the world providing global technology leadership, as well as highly specialized small- and medium sized businesses from across Europe. Globally our members employ over 80.000 people of which more than 50% in Europe generating a worldwide turnover over € 70 billion in 2021. The product scope of our members covers the full range of energy and communication cables. Europacable is listed in the European Commission's transparency register under 453103789-92. We are a partner of CENELEC. [www.europacable.eu](http://www.europacable.eu)