

Possible Authorisation of Lead metal under REACH: As Europe is forced to secure its energy independence, Europacable fears that the EU's security of power supplies and decarbonisation ambitions will be at risk by such a decision.

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Europacable, the voice of Europe's leading wire and cable manufacturers, is deeply concerned that, should Lead metal be made subject to Authorisation under REACH, internal Lead sheathing in underground and notably subsea cables may be prohibited as of 2028.

As there is no equivalently performing alternative available, this would put at risk Europe's urgent need to gain energy independence, whilst securing energy supplies for both consumers and industry and realising its decarbonisation ambitions. It would also obstruct Europe's cable industry and its supply chain to secure domestic production of cables, which are critical infrastructure technology.

Further to the European Chemicals Agency (ECHA) listing Lead metal in its draft 11th recommendation for inclusion in Annex XIV to the REACH Regulation in February 2022, the European Commission and ECHA collected information via two parallel public consultations which ran to 2nd May 2022. We understand that now both Institutions are reviewing relevant documents and ECHA is expected to transmit its updated draft 11th recommendation to the Member State Committee (MSC) in the last quarter of 2022.

In view of the upcoming discussions at the next ECHA MSC meetings, Europacable call on Member States to balance the need to control the concerns associated with Lead with Lead's contribution to the EU's energy security and green energy ambitions whilst recognising that any identified risk posed by the use of Lead in internal cable sheathing is already fully controlled.

A possible inclusion of Lead metal in the Authorisation List would bear disproportionate consequences. In essence, it would:

- 1) disregard that its use in underground and subsea cables poses no identified risk of human reprotoxicity;
- 2) export any environmental or human health risks to countries with lower safety requirements;
- 3) jeopardise the EU's energy independence and security of supplies and make the EU's decarbonisation, renewable and notably offshore ambitions unachievable;
- 4) put at risk the EU's existing electricity transmission capacity because installed internally lead sheathed power cables could not be repaired; and
- 5) jeopardise the EU's cable industry together with its supply chains, thereby undermining Europe's technological self-sufficiency and independence.

In Europacable's view, were Authorisation to proceed, the European Commission, ECHA and Member States will have to find a way to balance the need to control the concerns associated with Lead's contribution to EU's decarbonisation and energy security whilst recognising that any identified risk posed by the use of Lead in internal cable sheathing is already fully controlled.

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ANNEX

Internally Lead sheathed cables: Key for EU's energy independence and decarbonisation

High voltage underground and subsea cables are the core technology for Europe's electricity infrastructures. They are key to empowering the EU's energy independence and its decarbonisation ambitions, connecting the EU's offshore wind farms, national grids and serving as interconnectors, thereby securing energy supplies across Europe.

Less than 2% of Lead metal consumption in the EU is used in underground and subsea cables for internal Lead sheathing. This application encases a lead sheath on the inside of the cable, protecting power cables against moisture ingress, water penetration and corrosion in harsh environments. Lead ensures the cable's high reliability and long-life endurance.

In 2018, Lead was added to the REACH Regulation's "Candidate List" as a Substance of Very High Concern ("SVHC") due to its classification as toxic for reproduction category 1A. Were Lead to be included in REACH Annex XIV, the application of internal protective Lead sheathing in underground and subsea power transmission cables in Europe would likely be prohibited as early as 2028 - unless an authorisation is applied for and exceptionally granted to individual companies. This would consequently prohibit:

- 1) The installation of any new internally Lead sheathed underground or subsea cables in Europe to carry power generated from (offshore) wind or to interconnect electricity grids;
- 2) The repair of any internally Lead sheathed cable which has been damaged, leaving assets stranded and ultimately reducing available power transmission capacity;
- 3) The production of land or subsea cables containing Lead sheathing in Europe - which would have a devastating impact for Europe's cable industry including its downstream supply chains.

Internally Lead sheathed cables: All known risks are being controlled

Internal Lead sheathing does not pose any identified risks to human health or the environment during the life cycle of the cable:

- Manufacturing processes, installation and repair procedures are strictly controlled by workplace legislation (Council Directive 98/24/EC), covered by Best Available Techniques (Directive 2010/75/EU) and thus subject to binding Occupational Limit Values (OELs) of 0.15mg/m³ and biological limit values (BLV) of 70µg Pb/100 ml of blood. Europacable members abide by these limits and ensure full compliance at all times.
- During use, no exposure of Lead to the underground or subsea environment identified as confirmed by 2022 study.
- End of life is strictly controlled by workplace legislation and OEL/BLV.

Furthermore, ongoing revisions of law mean that subjecting Lead to Authorisation is premature:

- Existing OELs/BLVs are currently being reviewed to become more stringent;
- Directive 2004/37/EC on the protection of workers from the risk related to exposure to carcinogens or mutagens at work will be soon amended to cover substances like Lead classified as toxic for reproduction which will further increase worker protection.

Subjecting lead to Authorisation would be self-defeating: internally lead sheathed cables would still be used in the EU, just via a market distortion and with the unintended consequences of exporting environmental pollution and human health hazards that are adequately and sufficiently controlled in the EU.

Internally Lead sheathed cables: No alternative available to ensure longevity of cables

Today, no viable technology is available as an alternative for internal Lead sheathing in high and extra high voltage cable systems. Internal Lead sheathing is state of the art for subsea applications, due to its excellent performance and durability record.

Substitution of internally lead sheathed cables with lead-free alternatives is unlikely in the short-to-mid-term. It will take more than 10 years to develop a new Lead-free sheath design, with the same durable and stable performance standards. This timeframe is likely to deny to companies the necessary time, required to modify and scale up production, ensure viability and long-term reliability.

Eventual alternatives would only be applicable in the manufacturing process of new cables. Repairs of any already installed cables containing internal Lead sheathing most likely will only be conducted with other Lead sheathing.