

NOW IS NOT THE TIME TO SUBJECT LEAD METAL TO AUTHORISATION UNDER REACH

As Europe is forced to guarantee its energy independence, Europacable fears that the EU's security of power supplies and decarbonisation ambitions will be at risk by such a decision.

The inclusion of Lead in the REACH Authorisation Annex XIV would effectively prohibit its use as an internal protective sheath in cables. As there is no equivalently performing alternative, there would be no more production, installation or repair of internally Lead sheathed underground and submarine cables in Europe, which are essential for EU's energy supply needs.

EU WORST CASE SCENARIOS 2029:

 <p>ENERGY SECURITY</p>	 <p>OFFSHORE WIND</p>	 <p>ENERGY INDEPENDENCE</p>
---	---	---

FACTS:

<p>Thin internal Lead sheath</p> 	<p>All identified risks are being controlled</p> 	<p>Less than 2% of Lead metal consumption in the EU</p> 
---	---	--

Europacable therefore calls on the European Commission and Member States to refrain from recommending the inclusion of Lead in Annex XIV to the REACH Regulation: **Now is NOT the time.**

Europacable members are fully committed to working with all relevant bodies to continue to demonstrate that there is no risk to human health from the use of Lead as an internal sheath in submarine power cables.

ANNEX

Internally Lead sheathed cables: Key to empowering EU's energy independence, its security of power supplies and decarbonisation ambition

High voltage underground and subsea cables are the core technology for Europe's electricity infrastructures, connecting Europe's offshore wind farms to main transmission grids and interconnecting countries and islands, and thereby securing energy supplies across Europe.

Less than 2 % of Lead metal consumption in Europe 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 "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's Annex XIV (Authorisation Annex), manufacturing and use of internal protective Lead sheathing in underground and subsea power transmission cables in the EU would be prohibited as early as 2029 – unless an authorisation is applied for and **exceptionally** granted to individual companies. This consequently prohibits:

- 1) The/Any **production** of internally Lead sheathed cables in Europe – which obstructs Europe's cable industry manufacturing of such critical infrastructure technology, incl. downstream supply chain;
- 2) The/Any **installation** of internally Lead sheathed cables in Europe – which blocks future offshore wind and interconnection projects and undermines Europe's electricity transmission capacities;
- 3) The/Any **repair** of any internally Lead sheathed cable which has been damaged, leaving assets stranded and consistently reducing available power transmission capacity and thus jeopardising Europe's energy security and independence

95 % of use volume in Europe is for batteries and ammunition, which are already subject to sufficient risk management measures (batteries) or in the process of being subject to them (ammunition).

Internally Lead sheathed cables: All identified risks are being controlled

Any identified risks to human health or the environment stemming from Internal Lead sheathing during the life cycle of the cable **are being controlled**:

- 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 (Commission's call for evidence published on 14 February 2023);
- 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.

Internally Lead sheathed cables: No alternative available to ensure resilient cables

Today, no equivalently performing 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 new resilient Lead-free sheath technology, scale up its production and deploy it. The timeline for inclusion in the Authorisation Annex denies Europe's cable producing industry the necessary time to deliver on this. In addition, 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.