

**Brussels, 24 July 2017**

## **RESPONSE TO ECHA CONSULTATION ON THE PROPOSAL FOR A NEW REACH RESTRICTION ON LEAD COMPOUNDS IN PVC**

Orgalime thanks ECHA for issuing its [consultation](#) on the draft proposal for a REACH restriction on lead compounds and their use in articles or parts thereof produced from polymers or copolymers of PVC if the concentration of lead (expressed as metal) is equal to or greater than 0.1% by weight of the PVC material.

Orgalime supports, in point 3(d), the exclusion of electrical and electronic equipment (EEE) covered under Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS Directive) from the scope of the proposed REACH restriction.

The RoHS Directive already restricts the use of lead in EEE with a maximum 0.1% concentration values tolerated by weight in homogeneous materials. Therefore, the exclusion of EEE covered by the RoHS Directive from the scope of the REACH restriction is necessary to avoid any overlap and conflict with the RoHS Directive.

However, given the wording of the restriction which covers “articles or parts thereof”, we kindly ask you to specify that also components of EEE would be excluded from the restriction. This is in our view necessary to ensure a level playing field and fair treatment of EEE components placed on the EU market prior to assembly in final EEE. Otherwise, the lead restriction risks market distortions between EEE manufactured goods and imported equipment.

We would like to suggest the following wording for the second indent of point 3(d):

**“electrical and electronic equipment covered under Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS Directive) and components for such electrical and electronic equipment”**

We thank you for your kind consideration.

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*Orgalime, the European Engineering Industries Association, speaks for 41 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs nearly 11 million people in the EU and in 2016 accounted for some €2,000 billion of output. The industry represents over a quarter of the output of manufactured products and over a third of the manufactured exports of the European Union.*

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