

EUROMOT POSITION

REACH REVISION – EUROMOT’S FEEDBACK ON THE EUROPEAN COMMISSION’S INCEPTION IMPACT ASSESSMENT

31 May 2021

EUROMOT (the European Association of Internal Combustion Engine Manufacturers) appreciates the opportunity to comment on the EU Commission’s [Inception Impact Assessment \(IIA\)](#) on the REACH revision.

EUROMOT supports the Commission’s intention to step up action in the chemicals area in order to protect citizens’ health, as well as to simplify EU legislation on chemicals and make it more effective.

We would like to provide our sector’s point of view on four issues of the current REACH Regulation that the EU Commission has highlighted in its IIA.

- 1. Communication in the supply chain is inefficient and needs to be simplified.**
When exploring option to simplify communication in the supply chains, the IIA mentions the following: “Options for improving safety data sheets (information for downstream companies and workers on chemical risks and protective measures) will be assessed, including in particular harmonised electronic formats”. We would support such an approach, as safety data sheets are ubiquitous in industry and widely recognized as a means to communicate risk mitigation procedures throughout the supply chain. However, this would be only a partial solution, as much more needs to be done to simplify and increase effectiveness in communication within supply chains. This is especially true for sectors like ours, operating within very diverse global supply chains whose actors are not necessarily familiar with European regulations.
- 2. The current restriction process is too slow to sufficiently protect consumers and professional users against risks from the most hazardous substances.** While we support the efforts to make the restriction process more effective, we in no case support blanket prohibition of hazardous substances, particularly when there is no release of the given material and it provides a significant and measurable benefit to safety, emissions performance or lifespan of professional use equipment. At a minimum, when seeking to

speed up the restriction process, sufficient transition periods should be ensured to allow manufacturers to maintain fitness for purpose and risk mitigation.

3. **Reforming the authorization process.** In this case again, we fully support the Commission's clarification and simplification efforts. However, we also believe that a complete regulatory management option analysis (RMOA) is important to decide on the most efficient regulatory route and should always be conducted. For example, relating to the Commission's intention to "*improve the interface with other pieces of legislation*", our experience is that the different mechanisms and processes of REACH and RoHS have proven to be effective and adapted to the different nature of these two regulations (which we also underlined in our response to the RoHS evaluation Open Public Consultation). Additional details can be found in [our comment](#) on the EU Chemicals Strategy. At the same time though, we believe it would be crucial to have alignment between different pieces of legislation in terms of timing for new restrictions, to allow manufacturers the continuity of supply.
4. **Reinforcing control and enforcement.** We fully support the Commission's efforts in this direction: to this end, we believe that the establishment of minimum requirements for national control and enforcement should be accompanied by common interpretations of EU laws. In this regard, the role of EU Commission guidelines on a common interpretation across Member States to enable uniform enforcement is of key importance.

EUROMOT would like to thank the European Commission for the opportunity to raise these concerns in the context of the REACH revision, and reiterates its willingness to contribute to policy and regulatory developments in this area.

EUROMOT – 2021-05-31

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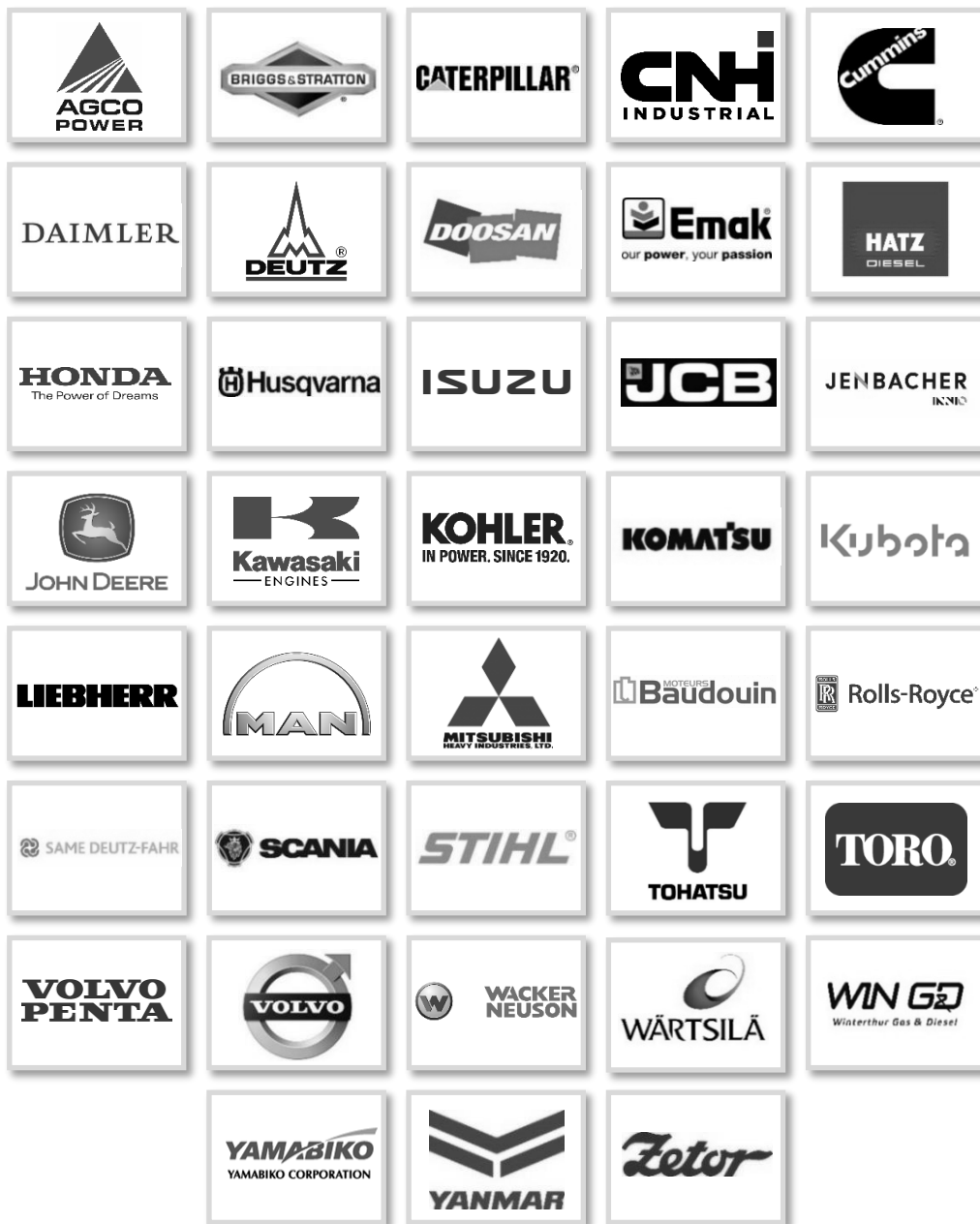
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