



**EUROMOT**

The European Association of Internal  
Combustion Engine and Alternative  
Powertrain Manufacturers

# **POSITION PAPER**

## **Recommendations on Proposal to Identify Decabromodiphenyl Ethane (DBDPE) as a Substance of Very High Concern (SVHC)**

**8 August 2025**

The logo consists of a solid green rectangle with the word "EUROMOT" in white, bold, sans-serif capital letters centered within it.

The European Association of Internal  
Combustion Engine and Alternative  
Powertrain Manufacturers

## EUROMOT POSITION

### RECOMMENDATIONS ON PROPOSAL TO IDENTIFY DECABROMODIPHENYL ETHANE (DBDPE) AS A SUBSTANCE OF VERY HIGH CONCERN (SVHC)

08 August 2025

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

EUROMOT member products are extremely complex, internal combustion engines typically have between 1200 to over 2000 components and electric engines have more than 200 parts. The scale of the number of components gives an insight into the high complexity of these devices. Moreover, EUROMOT members' products are highly integrated complete systems for power supply. These need to be adapted to the respective application or end use to fulfil the required work task, for example the quality of the operating fuels and the operating conditions (temperature, humidity, harsh chemical environment).

We acknowledge and support the overarching goal of reducing emissions of persistent and bioaccumulative substances such as decabromodiphenyl ethane (DBDPE). However, we respectfully submit the following comments on the European Chemicals Agency's (ECHA) proposal to identify DBDPE (EC No. 284-366-9; CAS No. 84852-53-9) as a substance of very high concern under REACH Article 57(e), based on its classification as very persistent (vP) and very bioaccumulative (vB).

#### 1. Use of DBDPE in EUROMOT Member Products

DBDPE is widely used (100 + parts) in Internal Combustion Engines and Alternative Powertrains placed in industrial non-road mobile machinery, marine and stationary applications as a flame retardant, primarily in wiring harnesses, cables, hoses, sensors, and other polymeric components. These components are critical to ensuring fire safety in high-risk environments such as marine vessels, generator sets, and non-road mobile machinery. The Annex XV report acknowledges DBDPE's strong adsorption to particles and its low volatility, which are essential properties for maintaining long-term flame retardancy and material stability in harsh operating conditions.



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A Non-Governmental Organisation in consultative status with the UN Economic  
Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

**PRESIDENT**  
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**GENERAL MANAGER**  
Dr Peter Scherm

## 2. Lack of Technically Feasible Alternatives

The Annex XV dossier notes that DBDPE is not readily biodegradable and has a high log KOW (8.1), contributing to its persistence and bioaccumulation potential. However, these same properties are what make DBDPE uniquely suited for applications where long-term thermal and chemical stability are required. If authorisation is granted to the supplier, it will be time-limited and subject to review. As downstream users, we would be expected to identify and transition to safer alternatives. However, no currently available flame retardants match DBDPE's performance without compromising safety or durability. Development and qualifying suitable alternatives for our sector would require extensive redesign, testing, and certification processes, often exceeding 7 to 10 years.

## 3. Impact of Authorisation on Industrial Safety and Supply Chains

An authorisation requirement for DBDPE could lead to serious supply chain disruptions, uncertainty and planning challenges. The authorisation process is complex and time-consuming. Downstream users may not know whether their suppliers will apply or be granted authorisation, making long-term planning difficult. If suppliers do not apply for authorisation, our members may lose access to the substance, forcing power system manufacturers to reformulate products and redesign process, as no alternatives are available. This would severely disrupt the production of essential machinery and infrastructure. As highlighted in the Annex XV report, DBDPE is present in hundreds of components per product. A rapid phase-out would be unfeasible and would jeopardize the availability of critical equipment used in energy production, transportation, and emergency services. Moreover, our supply chains are closely integrated with the automotive and transport sectors, which are also referenced in the Annex XV dossier. Any authorisation affecting these sectors would have cascading effects on component availability and cost.

## 4. Proposed Exemptions to be specified in Annex XIV

Should an authorisation requirement be implemented, EUROMOT strongly recommends the inclusion of specific exemptions for the following applications, consistent with the scope of Regulation (EU) 2016/1628 and related directives:

- Non-road mobile machinery (Art. 3(1), Reg. 2016/1628)
- Marine applications:
  - Seagoing vessels
  - Recreational craft (Art. 2.1(a), Reg. 2013/53)
  - Inland waterway vessels (Art. 3(34), Reg. 2016/1628)
- Railcars and locomotives (Art. 41–43, Reg. 2016/1628)
- Garden and forestry machinery (Art. 3, Reg. 2016/1628)
- Stationary machinery and generator sets (Art. 3(35–36), Reg. 2016/1628)
- Stationary combustion plants (Art. 3(5, 8–11), Dir. 2015/2193 and Art. 3(25, 34–35), Dir. 2010/75/EU)
- Transport and replacement/spare parts

These exemptions are essential to maintain the operability and safety of existing and future equipment and have no alternatives.

## 5. Administrative Burden of SVHC Notification

The identification of DBDPE as an SVHC would trigger extensive information and notification obligations under REACH Article 33. Given the complexity of our products, often comprising thousands of articles, tracking and reporting DBDPE content at the article level would impose a disproportionate administrative burden with limited environmental benefit. We therefore request that volume tracking requirements be waived for our sector. If information sharing is deemed necessary, we propose limiting it to components where DBDPE is intentionally added and present above the 0.1% threshold.

## Conclusion

EUROMOT appreciates the opportunity to provide input on this proposal. We reiterate our commitment to environmental protection and safe chemical use. However, we urge ECHA and the European Commission to consider the unique technical and socio-economic implications of restricting DBDPE in our sector. We remain available to provide further technical data and collaborate on risk management measures that balance environmental goals with industrial feasibility.



## THIS IS EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

## OUR MEMBERS



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