



THE VOICE OF THE INDUSTRY

Meeting with Dr Sharon McGuinness, Executive Director of ECHA

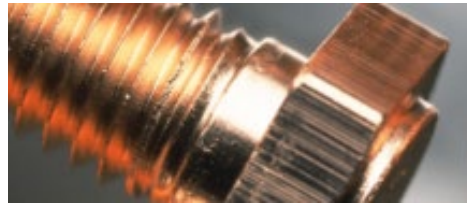
27 February 2023

Electroplating industry as an economic factor

... is the electrical deposition of metallic surface layers, e.g. of



Zinc



Copper



Chrome



Stainless steel

... lays the groundwork
for innovative
products

... saves resources

... prevents corrosion
and wear damage of
€ 150 billion p.a. in
Germany alone

Electroplating industry

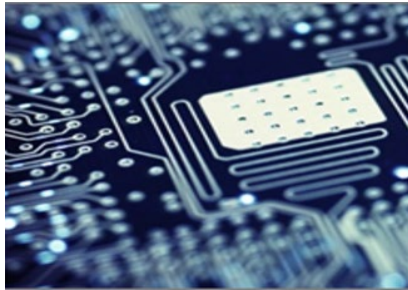


THE VOICE OF THE INDUSTRY

... is everywhere



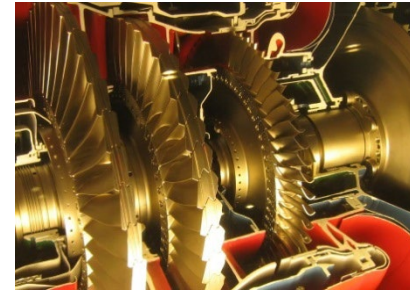
Automotive



Electronics



Plumbing



Engineering



Lifestyle



Aerospace



Information



Medical technology



Off-Shore



Screws and more

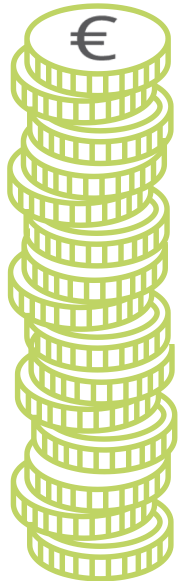
Mainly small- and medium-sized enterprises, thousands across Europe

Electroplating industry as an economic factor



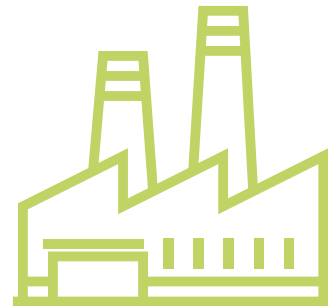
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Cross-sector industry and trendsetter



7.5 billion € p.a.
turnover in DE

**Mainly small- and
medium-sized enterprises**
(approx. 1,200 in Germany)



> 50.000

Employees

> 440.000



Indispensable partner
in the value chains of
major economic sectors



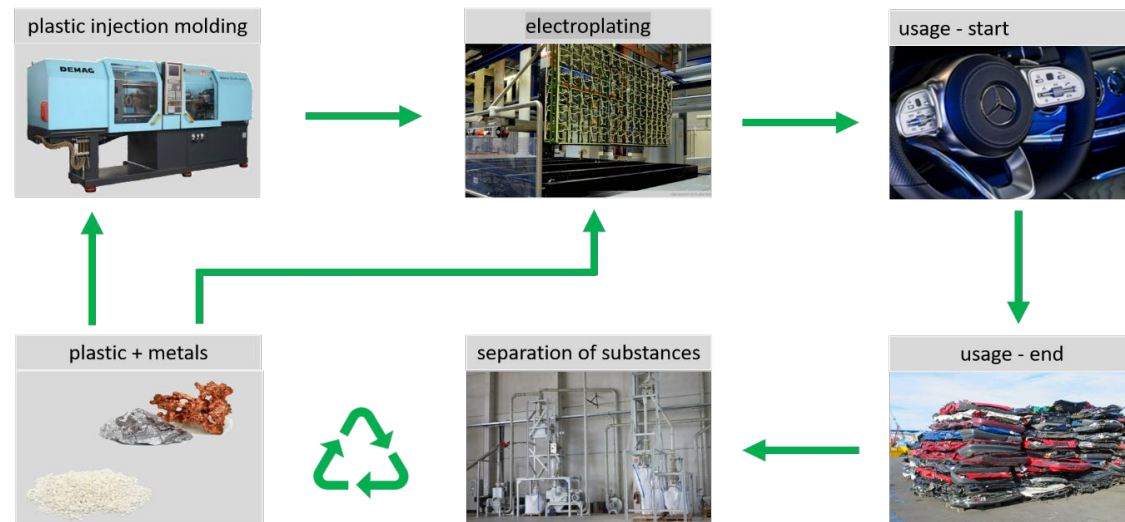
Example: A car contains more
than 3,000 parts that have
been electroplated.

Electroplating industry as a factor for closing the Circular Economy

Real metal surfaces have the following advantages compared to alternative methods that can only imitate this technology by means of a lacquer structure or a PVD coating.

- No microplastics!
- 100% circular!
- Low carbon footprint!
- Crucial element for completing the circular economy!

Chrome parts life cycle strategy



Protective effect of chrome plating

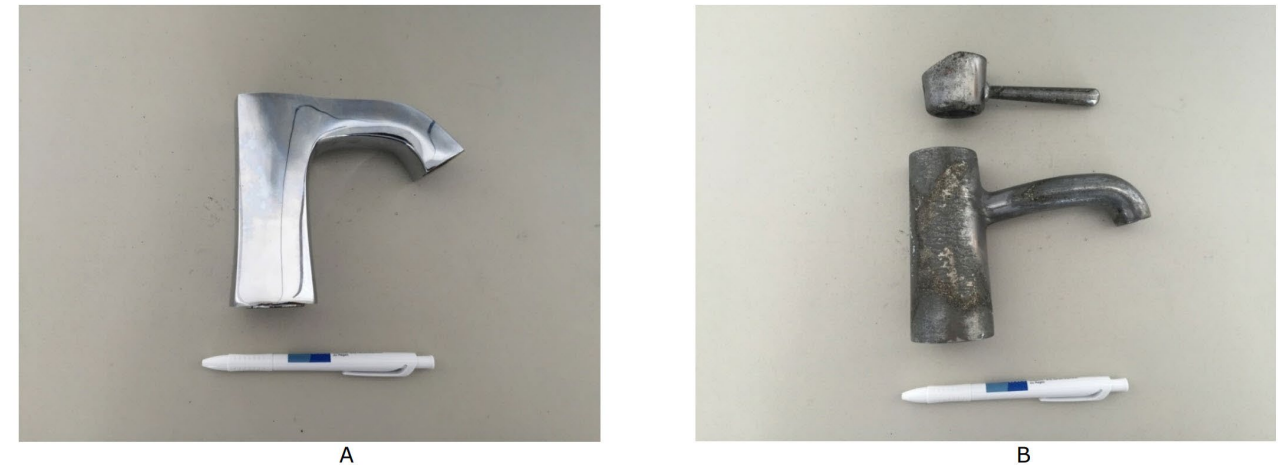


Figure 2. Difference between Cr(VI) plated sanitary faucet after Kesternich test (corrosion testing after exposure to sulphur dioxide containing atmosphere). (A) GROHE, brass faucet body "Grandera" (produced in 2013, Hemer plant, Germany); (B) IKEA, brass faucet, Cr(III) plated (assumed) sanitary faucet.

European Committee for Surface Treatment (CETS)



- Established in 1981

- 22 members across the EU (national industry organisations)

- EU Accredited Stakeholder Organisation (ASO)

- Represents several hundred SMEs in the EU (providing 440,000 jobs)

Objectives:

- Providing a means for European manufacturers and suppliers to exchange information on a wide range of topics of interest
- Assisting the European Institutions and Agencies in developing effective regulation of hazardous chemicals

- Further information: <https://cets-eu.be/>

EU Regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)



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- Entered into force on 01.06.2007. Authorities and companies have gained insights on the strengths and deficits of the framework.
- Important achievements have been made that improved the protection of human health and the environment from hazardous chemicals.
 - Reduced application of Substances of Very High Concern
 - According to the latest ECHA study in 2021, five years after the entry to Annex XIV, Swedish firms had reduced their annual use of SVHC requiring authorisation by about 40%
- However, different assessments carried out by ECHA and COM have shown the urgent need for improvement:
 - Optimise protection level while guaranteeing competitiveness of European companies
 - Relieve authorities and companies of the enormous administrative burden

Inception Impact Assessment on the REACH Revision (05/2021)

*„The authorisation procedure is **too heavy and inflexible**. The authorisation process has imposed a heavy burden on both companies and authorities. [...] this has placed EU-based companies at a competitive disadvantage compared to their non-EU competitors.“*

Background Paper - Workshop on the Reform of the REACH Authorisation and Restriction System (10/2021)

*“Dealing with such a high amount of often very detailed information, complex assessments, controversies and court cases, **binds significant resources from ECHA, the Commission and Member States**. As a consequence, those resources are not available to deal with other, potentially more important concerns.“*

*“This has also affected the choice of risk management measures by authorities. **Following the experience with chromium(VI) substances, no other SVHC with a similar widespread use has been recently added to Annex XIV**. Risk from widespread use of such substances have been, or are being addressed more recently rather through the restriction procedure (e.g. PFAS substances) or through occupational health and safety measures (e.g. cobalt and its compounds, lead and its compounds)“*

“Develop and implement - jointly with the Commission - an agreed approach to deal with the anticipated significant increase in the number of authorisation applications. [2023]”

“The performance indicators for the Strategic Priorities from 2024 onwards will be defined in line with the new multi-annual objectives in the context of development of ECHA’s new multiannual Work Programme in 2023.”

Authorisation Procedure - Chromium trioxide as negative example



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- Some applications are pending since 2015, affecting hundreds of companies
- The number of applications will rise further, increasing the burden on authorities
- There is an urgent need to find compromise solutions to solve the problem regarding functional chrome plating with decorative character

Solution 1

Give companies appropriate time and guidance to adjust the substitution plans

Solution 2

Adjusting the ECHA guidance for defining „intermediates“

Solution 3

Setting a new „sunset date“ as a definitive end for the use of chromium trioxide

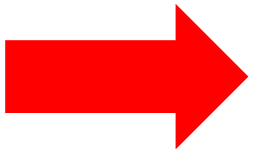
Revision of REACH - Intensification of existing problems

■ Generic Risk Approach

- Dangerous shift from concrete risks to potential hazards.
- Not all substances that are potentially hazardous automatically pose risks to users/consumers through their intended use.
- Safe and controlled use of hazardous substances by specialised producers would be prohibited.

■ Essential use

- Many substances can be assigned to various functional groups.
- Unclear which bodies will determine what is essential and on what basis.
- What is ECHA's future role here?



Instead of making the regulation more efficient, the plans for the REACH revision would bring additional burden for authorities and companies without proven benefits for the protection of human health and the environment!

Drastic effects of incautious regulation



Disinfectants



Medical textiles & equipment



Diapers



Stainless steel pots



Chrome plated faucets



„Safe uses“ in industrial plants



Sealing tape for craftsmen/plumbers

Central principles

1. Bans must be based on a proven and significant harmful effect when used as intended!
2. Define quantifiable targets and monitor the results → If targets are not met, measures must be corrected/reversed!

Define controllable and therefore acceptable risk levels



Improve regulation AND avoid blanket bans

Avoid contradictions with proven, existing sector-specific regulations, such as OSH



Regular review of OSH limits

CETS is looking forward to future meetings and cooperation with ECHA (whenever possible in person rather than online)

Given appropriate time, SMEs are happy to give insights and expertise → This has in the past proven to be a crucial element of the successful workshops hosted by ECHA

Thank you for your attention!

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