

## **RGI calls for a balanced approach on the inclusion of Lead in the Authorisation List under the REACH Regulation in view of its needed use in electricity subsea cables**

RGI welcomes the overall intention of the REACH Regulation to increase awareness and reduce risks that originate from the use of Substances of Very High Concern (SVHC) in the European Union. We acknowledge the reasons to include Lead in the 11th draft recommendation of the European Chemical Agency (ECHA), currently in consultation until the 2nd of May, intending to make it subject to strict Authorisation in the EU. We fully understand the properties of this material and the potential risks stemming from its use without the necessary precautionary measures. However, we are convinced that the decision to subject Lead to Authorisation in the EU would require a balanced approach to avoid wide-ranging negative socio-economic impacts, and unintended negative consequences for the European decarbonisation trajectory, the internal energy market and security of energy supply.

**Lead holds continued importance for concrete applications of the electricity grid, covering its construction, installation, and repair.** In some power cables, i.e., high and extra high voltage underground and subsea cables, internal Lead sheathing provides an effective layer of protection, preventing water ingress and corrosion in hostile environments. This allows for durability and extends its expected lifetime. The amount of Lead metal in these applications only accounts for less than 2% of the total Lead consumption in the EU. On top of that, safeguards to address potential risks are already in place in European legislation, covering the whole life cycle of electricity cables.

**Making Lead subject to extensive authorisation requirements would undermine European decarbonisation efforts and increase European dependence on imports.** RGI strongly believes that the swift roll-out of renewable energy sources (RES), especially wind and solar, needs to be coupled with the deployment of the enabling grid infrastructure. Therefore, delivering an accelerated energy transition and building Europe's energy independence, necessitates high performance electricity cables, connecting RES generation and demand, as well as integrating the internal energy market through interconnections between Member States. To meet the ambitious targets for offshore wind generation, subsea cables connecting windparks to the European electricity grid system are urgently needed. Given the current lack of viable alternatives to internal Lead sheathing, the need for authorisation for the use of Lead in electricity high voltage cables would be disastrous and prevent us from reaching our decarbonisation targets, as well as further increase European dependencies on imports.

**RGI recognises that enhanced research and development is needed prior to any decision that could affect domestic production and availability of internally Lead-sheathed cables.** For this to happen, adequate time should be made available for the European cabling industry to find technical and commercial alternatives, ultimately resulting in the replacement of Lead with other feasible alternatives. That way the EU

will avoid the risk of creating new dependencies as well as, most relevant, exporting pollution and Lead-related risks to regions with looser regulations in place.

It is therefore necessary to find a fitting solution for the European cabling industry, to further move towards energy independency by massively scaling up renewable energy sources, and to strongly contribute to decarbonisation and electrification without exporting risks, impacts and jobs to countries outside of the European Union.

For further information on the use of Lead in power cables, find ENTSO-E's position paper here: <https://www.entsoe.eu/2021/11/30/entso-es-new-position-paper-on-the-use-of-lead-in-power-cables/>

### About RGI

The Renewables Grid Initiative is a unique collaboration of NGOs and TSOs from across Europe engaging in an 'energy transition ecosystem-of-actors'. We promote fair, transparent, sustainable grid development to enable the growth of renewables to achieve full decarbonisation in line with the Paris Agreement.

RGI Members originate from a variety of European countries, consisting of TSOs from Belgium (Elia), Croatia (HOPS), France (RTE), Germany (50Hertz, Amprion, TenneT and TransnetBW), Ireland (EirGrid), Italy (Terna), the Netherlands (TenneT), Portugal (REN), Spain (Red Eléctrica de España) and Switzerland (Swissgrid); and the NGOs BirdLife Europe, Climate Action Network (CAN) Europe, FNE, Friends of the Earth Ireland, Fundación Renovables, Germanwatch, Legambiente, NABU, Natuur&Milieu, the Royal Society for the Protection of Birds (RSPB), WWF International and ZERO. Europacable is a Supporting Member.

RGI gratefully acknowledges funding from the European Commission's LIFE operating grant for NGOs. The sole responsibility for the content of the newsletter lies with RGI.