



Lubin, 23 February 2023

ZPPM / 6S / II / 2023

Dr Andy Bush
Managing Director
International Lead Association

Mr Guy Thiran
Director General
Eurometaux

Subject: Support of the International Lead Association (ILA) Open Statement on lead authorization – European Chemicals Agency's (ECHA) recommendation to include lead metal (Pb) as a priority substance in the REACH Authorisation

Dear Sirs,

Acting in agreement with KGHM Polska Miedź S.A., which in Poland is the ILA's appointed National Advocacy Coordinator, the Polish Copper Employers' Association – Związek Pracodawców Polska Miedź (ZPPM) fully supports the ILA Open Statement on lead authorization.

ZPPM, as the Polish national federation, fully agrees that progressing the European Chemicals Agency's (ECHA) recommendation to include lead metal in the REACH Authorisation List would have severe consequences for a broad range of strategically important European industries, for which lead is an essential raw material that does not have any technical or socio-economically viable alternatives.

We would like to highlight that lead metallurgy is key to urban mining and the Circular Economy philosophy, and the EU's lead production and recycling technology is world leading. In short, lead plays a significant role in the EU industrial economy. A move to include lead in the REACH Authorisation List will have the very real effect of stifling innovation and withdrawing investment from those critical EU Industries that still rely on its use.

We fully agree that the EU already has a comprehensive framework of lead-specific legislation designed to manage risk to human health and the environment. ECHA itself has acknowledged that the minimum requirements to protect worker health appear to be set via the binding limit values for lead, with more stringent values already anticipated under the Carcinogens, Mutagens and Reprotoxic Substances Directive.

We share the concerns expressed by ILA that the REACH Authorisation Listing for lead will simply add unnecessary bureaucratic burden, block investment and is not the best option to improve risk management, stimulate faster substitution, or reduce exposure. Adding lead to the REACH Authorisation List with prior knowledge of these consequences for industry and regulators makes no sense, especially considering the ongoing review of the REACH regulation that is designed to make it more efficient.

Employers' Organization of Polish Copper – Związek Pracodawców Polska Miedź

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We fully support the actions to urge the Commission to reject ECHA's recommendation, support EU businesses and continue discussions on what could be a more effective and proportionate risk management measure to address any residual concerns with lead exposures.

Acting in agreement with KGHM Polska Miedź S.A., which in Poland is the ILA's appointed National Advocacy Coordinator, the Polish Copper Employers' Association – Związek Pracodawców Polska Miedź (ZPPM) wish to co-sign the ILA Open Statement. Please find attached a copy of our logo for inclusion in the annex to the document.

Yours faithfully

Beata Staszaków

President of the Board & CEO of The Polish Copper Employers' Association

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