

EU ISSUES UPDATE

APRIL 2022



OPPORTUNITIES FOR DIALOGUE

FIVA responds to EU consultation on the repair and reuse of products.

In April FIVA contributed to a consultation on the possibility of legislation on the repair and reuse of products and which is intended to encourage both repair and reuse of products. In its submission, FIVA explained:

- its definition of a historic vehicle
- all historic vehicles are in use today because they have been maintained throughout their lives
- the end of the life of the vehicle is not foreseen because the objective of the owner is to preserve the vehicle in perpetuity
- all owners are therefore implementing sustainable consumption.

The submission concluded by noting that the preservation and occasional use of historic vehicles on roads provides a free museum of motoring heritage and at the same time embodies the concept of “repair and reuse”.

FIVA responds to European Chemicals Agency consultation on lead

In April FIVA responded to a consultation by the European Chemicals Agency proposing to include lead in the REACH authorization list which, if adopted, would mean that authorisation (which is costly and time consuming) would be needed to place on the market and use lead in products.

In its submission, FIVA requested that the use of lead for the purpose of historic vehicle ownership, maintenance and restoration be allowed if ECHA and the EU determine that lead should be included in the REACH authorization list. FIVA explained its position by noting that:

- the use of lead is necessary to maintain historic vehicle authenticity and in order to maintain core skills necessary for the repair and maintenance of motoring heritage.
- Maintenance and restoration are primarily undertaken by small and medium sized enterprises - the majority of which will lack the administrative and/or financial resources to undergo the authorisation process.

- The use of lead for historic vehicles is most common for repairing and restoring bodywork, cooling systems and electric and electronic installations in an historically authentic manner. Substituting lead with other products would impact authenticity and the quality of repair/restoration.
- An exemption to allow the continued use of lead for historic vehicle repair and restoration is appropriate to avoid a disproportionate impact on the thousands of small and medium sized enterprises within Europe servicing the historic vehicle movement and to ensure that our motoring heritage is preserved for future generations to be able to enjoy.

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The FIVA Legislation Commission members are: Lars Genild (Chairman), Sébastien Berthebaud, Giuseppe Dell'Aversano, Wolfgang Eckel, Carla Fiocchi, Peeter Henning, Johann König, Stanislav Minářík, Bob Owen, Bert Pronk, Kurt Sjoberg and Andrew Turner of EPPA works with the Committee.