

The European Automobile Manufacturers' Association (ACEA) represents the 15 major Europe-based car, van, truck and bus makers.

BMW Group, CNH Industrial, DAF Trucks, Daimler, Ferrari, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Jaguar Land Rover, Renault Group, Stellantis, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group.

ACEA wants to highlight the following concerns related to the TRIS Notification 2020/832/France-Decree on the provision of information to identify endocrine disruptors (ED)

### **Disruption of the Single Market:**

The requirements on information to consumer are redundant with already existing legislations (art. 33.2 of REACH and SCIP notification)

The mandatory information is also going further than the legislative framework mentioned above. The French obligation will include substances of very high concerns (SVHC) substances and additional substances having a comparable concern to SVHC, but not listed on the Candidate List. Some substances have been proposed in the past for identification as SVHC but have finally been found not to be SVHC after discussion under the European procedure. This new requirement disregards the harmonised European procedure.

Regarding the open data to the public on EDs, including the creation of a data base on EDs, the automotive industry is asking for :

An evaluation of the criteria used for the identification of EDs in 3 categories foreseen by the law (known/presumed/suspected).

A harmonisation with the criteria decided at EU level is essential.

More transparency on the process followed for listing substances.

A consultation of stakeholders before listing substance for a solid decision.

ACEA asks for a harmonisation of the obligations in France with the decisions that will be taken soon at EU level in the context of the Green Deal (e.g. Sustainable Product Initiative, Chemical Strategy for Sustainability)

Each mandatory requirement at national level that is not aligned with European requirements will lead to competitive distortion, will jeopardise the level playing field and will increase the administrative burden for companies in France. Furthermore, obligation of labelling differing with EU obligations will affect the free circulation of goods within the EU.