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## JOINT INDUSTRY STATEMENT ON HARMONIZED CLASSIFICATION AND LABELLING (CLH) PROPOSAL FOR LITHIUM SALTS

Following the proposal of a Repró 1A H360FD classification of lithium carbonate, lithium chloride and lithium hydroxide by the French Agency for Food, Environmental and Occupational Health & Safety (ANSES), the European battery industry wants to express its concern about the justification and validity of the classification dossier. While key studies show that no compound-related effects on developmental and reproductive toxicity exist, the consequences of an unjustified Repró 1A classification would be severe on the further establishment of a sustainable yet competitive battery ecosystem in Europe.

As stated in the section 5 of the CLH proposal from ANSES, lithium carbonate, lithium chloride and lithium hydroxide are pivotal elements to produce:

- Rechargeable lithium-ion batteries,
- Rechargeable nickel-based batteries,
- Primary lithium batteries.

and, thus, pivotal to (electric) mobility, for medical, back-up and safety devices, and decarbonized electricity generation.

**The battery industry questions the validity of the studies that have been used by ANSES** to conclude that lithium carbonate, lithium chloride and lithium hydroxide were reprotoxic. In fact, the key study of 2010 (Klimisch 1-level) and other studies of 2012 (Klimisch 2-level) showed **no evidence of cardiac malformations in animals after exposure to lithium compounds**. Nonetheless, ANSES refer in their classification dossier to studies that were conducted more than 30 years ago and lack compliance with OECD Good Laboratory Practice principles (Marathe and Thomas, 1986; Kelley and al., 1978; Fritz, 1988).

Given the importance of lithium compounds for the different battery technologies and the fact that lithium was recently identified by the European Commission as a Critical Raw Material, an unjustified CLH Repró 1A classification would result in **excessive burdens for the European battery value chain**. The undersigned industry associations fear long-term implications on planned and future investments in the battery sector, including on extraction projects, refining and manufacturing of lithium compounds, battery cell manufacturing as well as on the recycling of lithium-based batteries.

**We urge the European Chemicals Agency to carefully assess the French classification dossier and take our industry concerns into account.**

**For questions, please contact:**

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