



Council of European Employers  
of the Metal, Engineering and  
Technology-based industries



**European Welding Association**



**ORGALIME**

BusinessEurope, Ceemet, ENTSO-E, Eurelectric, Euro Chlor, the European Aluminium Association, the European Welding Association, Orgalime have been closely following the developments regarding the revision of Directive 2004/40/EC on Electromagnetic fields. After several years of extensive consultation with stakeholders and Member States, while it still includes areas which present problems for different sectors of industry, some good progress had been achieved with the Commission's proposal of 14 June. This is notably in terms of simplification and additional flexibility, which should be retained.

We are very concerned that significant changes are being hastily drafted in conjunction by the Council without allowing any time or opportunity for experts to analyse the proposed changes or to reflect on the impact these changes might have on industry.

They could result in severe restriction, or even a ban on vital industrial processes. At the very least they could impose a disproportionate and costly burden on many industries across Europe without technical justification.

We therefore urge Member States to retain the improvements in the Commission Proposal that have been achieved and to reject any subsequent changes of which the impact on industry has not been properly assessed.

If necessary a further postponement of the Directive should be proposed by the Commission in order to ensure that the problems arising from the initial version are solved.

Brussels, 18 November 2011

Contact person: [Isabelle.biais@ceemet.org](mailto:Isabelle.biais@ceemet.org)