

Questionnaire

Exemption 2c Annex II Directive 2000/53/EC

“Lead as an alloying element in aluminium with a lead content up to 0,4 % by weight”

Stakeholders are invited to clarify the following specific questions as detailed as possible. In your contribution, please state which question number you are referring to.

- 1) The current exemption covers (a) applications where lead is intentionally added to aluminium alloys for an improved machinability and (b) aluminium alloys that contain lead unintentionally due to their production from scrap metal. Regarding part (a) some of the machining alloys containing lead can already be substituted by lead free machining alloys. Please indicate which parts of vehicles can possibly be replaced by lead free machining alloys / which parts of vehicles can not be replaced by lead free machining alloys. In the latter case, please also give a sound explanation why such a substitution is technically or scientifically unfeasible (e.g. for aluminium alloys for brake components).
- 2) Casting alloys contain lead unintentionally due to their production from scrap metal. As different types of casting alloys are used in vehicles, please indicate the percentage of casting alloys used in vehicles that do have lead contents > 0.1% by weight.
In which applications are those alloys with a lead content > 0.1% used?
Which percentage of lead containing aluminium alloys would comply with a level of up to 0.2% lead by weight?
- 3) Please provide sound data/figures that the quantity of energy needed to produce primary metal is 95% higher than the amount of energy needed to produce casting alloys from scrap.
- 4) Please indicate which percentage of aluminium casting alloys with a lead content >0.1% is disposed in landfills and/or exported.

Furthermore, the following general questions can be used to support the exemption or taken as a basis for requesting an amendment or the discontinuation of the exemption:

- What is the application in which the substance/compound is used for and what is its specific technical function?
- What is the specific (technical) function of the substance/compound in this application?
- Please justify why this application falls under the scope of the ELV Directive (e.g. is it a finished product? is it a fixed installation? What category of the WEEE Directive does it belong to?).

- What is the amount (in absolute number and in percentage by weight) of the substance/compound in: i) the homogeneous material¹, ii) the application and iii) total EU annually for relevant applications?

Documentation provided by stakeholders including replies to the questions above should take the following points into consideration:

- Please justify your contribution according to Article 4 (2) (b) (ii) ELV Directive, i.e.
 - Justification for exemption still given or not given anymore according to technical and scientific progress;
 - Substitution of concerned hazardous substances via materials and components not containing these is technically or scientifically either practicable or impracticable;
 - Elimination or substitution of concerned hazardous substances via design changes is technically or scientifically either practicable or impracticable.
- Please provide sound data/evidence on why substitution/elimination is either practicable or impracticable (e.g. what research has been done, what was the outcome, is there a timeline for possible substitutes, why is the substance and its function in the application indispensable or not, is there available economic data on the possible substitutes, where relevant, etc.).
- Please also indicate if feasible substitutes currently exist in an industrial and/or commercial scale for similar use.
- Please indicate the possibilities and/or the status for the development of substitutes and indicate if these substitutes were available by 1 July 2003 or at a later stage.
- Please indicate if any current restrictions apply to such substitutes. If yes, please quote the exact title of the appropriate legislation/regulation.
- Please indicate benefits/advantages and disadvantages of such substitutes.
- Please state whether there are overlapping issues with other relevant legislation such as e.g. the Energy-using Products (EuP) - EuP Directive (2005/32/EC) that should be taken into account..
- If a transition period between the publication of an amended exemption is needed or seems appropriate, please state how long this period should be for the specific application concerned.

Stakeholder contributions shall be clearly marked “NOT FOR PUBLICATION” if they are not be posted as comments on the consultation website (http://circa.europa.eu/Public/irc/env/elv_4/library).

¹ Please refer to the FAQ document on RoHS and WEEE Directives available at http://www.europa.eu.int/comm/environment/waste/weee_index.htm

