

Questionnaire

Exemption 6 Annex II Directive 2000/53/EC

“Vibration dampers”

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) Please specify the typical quantity of lead used in vibration dampers / the typical weight of lead-containing vibration dampers and the range of weights that are used.
- 2) According to information provided by the automotive industry during previous evaluations, in many cases a substitution of lead containing vibration dampers is already possible e.g. by steel dampers / cast irons, etc. Please indicate the percentage of vehicles that still requires leaded vibration dampers.
- 3) In vehicles where plastics are increasingly used as construction materials or in open sport cars where the car body gives less rigidity, the mass of vibration dampers rather increases. Does this imply that for these types of vehicles even heavier lead vibration dampers are needed in future? The study by Ökopol mentions max. weight of lead vibration dampers of up to 20kg.¹
- 4) Please provide an estimate of the annual quantities of lead used in vibration dampers in Europe and/or worldwide.
- 5) In the above mentioned Ökopol study (2001) it is concluded that the substitution of lead e.g. by cast iron or highly filled polyacrylates is not possible in all existing models for space reasons. Please indicate whether this problem “available space” has been solved meanwhile in new vehicle models by an adapted design, so that non-leaded vibration dampers could even be used in cases when mass is needed on one spot?
- 6) In the previous evaluation by Ökopol (see above) it was argued that substitutes like cast iron do not absorb vibrations as effectively as lead. . Please indicate which research has been done during the last years to find other substitutes that are more suitable to absorb vibrations and/or to develop specifically adapted solutions? Please provide specific documents/evidence supporting the search for substitutes / adapted solutions.
- 7) Please provide a roadmap to legal compliance for the currently unavoidable uses of vibration dampers made of lead.

¹ Lohse, J. et al. (2001); Heavy Metals in Vehicles II (Final Report); Ökopol – Institut für Ökologie und Politik GmbH, Hamburg, Germany; Report compiled for the Directorate General Environment, Nuclear Safety and Civil Protection of the Commission of the European Communities Contract No B4-3040/2000/300649/MAR/E.3

- 8) The use of vibration dampers containing lead in vehicles has to be labelled or made identifiable in accordance with Article 4(2)(b)(iv) of the ELV Directive. Do all manufacturers register vibration dampers containing lead in the IDIS system? In which way is the information about the presence, location and dismantling procedure of vibration dampers in vehicles made available to dismantlers?

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 material², 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.

² Please refer to the FAQ document on RoHS and WEEE Directives available at http://www.europa.eu.int/comm/environment/waste/weee_index.htm

- 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).