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Ihr Zeichen
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Ihre Nachricht vom
29.05.2018

Unser Zeichen
MK

Durchwahl 82-
2139

Datum
25.06.2018

**Annex: Saint-Gobain Sekurit contribution to stakeholder consultation questionnaire
Exemption No. 8(j) “Lead in solders for soldering of laminated glazing”**

- 1) **Please explain whether the use of lead in the application addressed under Exemption 8(j) of the ELV Directive is still unavoidable so that Art. 4(2)(b)(ii) of the ELV Directive would justify the continuation of the exemption. Please take into account the above described background information concerning the result of the last review as far as possible. Please be specific with your answer, for example clarify, if applicable, what types of vehicles your answer refers to, i.e., conventional vehicles and various types of hybrid and electric vehicles and which functionalities the exemption still needs to cover.**

Saint-Gobain Sekurit has developed and industrialized technologies for lead-free soldering in/on laminated glass for conventional, hybrid and electrical vehicles, which are already used in mass production of the automotive industry today.

Consequently, a **continuation of exemption No. 8(j) is not required.**

- Soldering in laminated glass: The first serial solution has been brought to the market already in 2013. Until today Saint-Gobain Sekurit has further enriched the portfolio of lead free solutions which have been validated on industrial scale in order to cover all known applications.
- Soldering on laminated glass: The first serial solution has been brought to the market in 2014. Various car models have followed until 2018 implementing other technical processes and connector types. Saint-Gobain Sekurit has developed several technological solutions that can be adapted to the specific needs of its customers, covering the full range of today known applications.

- 2) **Please explain the efforts your organization has undertaken to find and implement the use of lead-free alternatives in the manufacture of laminated glazing for automotive uses. Please refer to alternatives, which at least reduce the amount of lead applied or eliminate its necessity altogether.**

Saint-Gobain Sekurit has invested significant resources in the development of lead-free glass component solutions for the last 10 years. Since the first introduction of a lead free solution in 2013 Saint-Gobain Sekurit has been enriching the portfolio of lead free soldering technologies to cover all known applications. For both, soldering in laminated and on laminated glass, Saint-Gobain Sekurit can offer lead free soldering solutions to all its customers meeting their specifications.

- 3) **Please provide a roadmap specifying the necessary steps/achievements in research and development including a time scale for the substitution or elimination of lead in this exemption.**

Not applicable – Saint-Gobain Sekurit can offer lead free solutions to its customers for all existing applications.

- 4) **What is the amount of lead that would be contained in laminated glazing of vehicles**
a. placed on the EU market and
b. worldwide
in case the exemption remains valid beyond 2019? Please provide a substantiated estimate clarifying how you have arrived at the stated result.

The amount of lead used in the solder depends very much on the type of the connector. Generally speaking, 30mg lead are used on average per connector today.

According to Saint-Gobain Sekurit information, the European market for laminated glasses with electrical connectors for heating and/or antenna is approximately 12,5 Mio pieces per year, equipped with 2 connectors per glass on average. Based on these figures 0,75 metric tons of lead would be contained on the EU market in case the exemption remains valid beyond 2019.

According to Saint-Gobain Sekurit information, the worldwide market for laminated glasses with electrical connectors for heating and/or antenna is approximately 35 Mio pieces per year, equipped with 2 connectors per glass on average. Based on these figures 2,1 metric tons of lead would be contained on the market worldwide in case the exemption remains valid beyond 2019.

5) Overall, please let us know whether you agree with the necessity to continue the exemption and sum up your arguments for or against its continuation.

Saint-Gobain Sekurit can provide lead-free soldering solutions to all its customers for all known applications. Since 2013 several car models equipped with laminated glazing have been brought to the market, using lead-free components soldered by Saint-Gobain Sekurit. In the sake of the Group's activities, Saint-Gobain Sekurit is striving to reduce its ecological footprint by a proper choice of materials and to enable sustainable mobility to its customers. Consequently, **a continuation of exemption No. 8(j) is not required.**

Contact partner for questions or requests for further details is Mr. Marc Koelling (marc.koelling@saint-gobain.com; +49 178 2000 860; Saint-Gobain Sekurit Deutschland GmbH & Co. KG, Glasstr. 1, 52134 Herzogenrath, Germany).