

## **Specific questions ELV exemption 8a**

The current exemption 8a in the Annex II of Directive 2000/53/EC (ELV Directive) is as follows:

*Lead in “Solder in electronic circuit boards and other electrical applications except on glass” in “vehicles type approved before 31 December 2010 and spare parts for these vehicles”.*

1. Please explain your position on the above exemption wording and its deadlines.

Electronic and electrical components and equipment in vehicles are exposed to and used in harsh environments. For that reason, lead was not yet be replaced to the same degree like in other electronic equipment, e.g. in the scope of the RoHS Directive. The harsh environmental conditions apply in particular to underhood applications, while the situation may be different for other applications, e.g. for electronics within the cabin of vehicles. In the last review of Annex II of the ELV Directive, the stakeholders could not plausibly explain why lead cannot be replaced in such electronic and electrical components and equipment, due to the less demanding requirements (see page 51 in final report from the Adaptation to Scientific and Technical Progress of Annex II Directive 2000/53/EC from January 2008).

2. Please explain whether and how far lead can be replaced in less demanding applications in vehicles, e.g. in the cabin or in other applications, similar to the situation with equipment under the RoHS Directive.
3. In case you do not agree with the current exemption and its deadlines, please provide an alternative and clear wording for the exemption including deadlines. Please take into account the answer to the above question 2 and justify the deadlines.