Questionnaire

Exemption 1 Annex II Directive 2000/53/EC

"Lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead 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.

Steel for machining purposes:

1) Please provide an estimate of the annual amount of lead used in machining steel produced in Europe for the automotive industry.
2) As there exist different types of leaded steel (e.g. low carbon free-cutting steels, Al-killed steels, etc.), please specify for which types / applications a phase out of lead is currently technically or scientifically impossible / impracticable. Please provide sound data/evidence on why substitution/elimination is impracticable.
3) Please explain research efforts and results to find lead-free alternatives and provide a roadmap for the elimination of lead in steel for machining purposes and galvanised steel.
4) Please specify which steel parts of vehicles are not environmental/safety critical and could thus be replaced by non-leaded steel alternatives?
5) Please indicate / estimate the recovery / retrieval rate of lead from lead steel that ends up as scrap in electric arc furnaces.

Galvanised steel:

The current review shall include an exchange with stakeholders on the possibility to limit the current exemption for the use of lead up to 0,35% by weight as an alloying element in *galvanised steel to low volume components of more complex geometry* (since all other applications are already covered by the tolerated maximum concentration value of < 0,1%Pb). This stakeholder consultation therefore aims at either (a) getting a comprehensive list of applications for galvanised steel that need an exemption or (b) restrict the scope of the current exemption by rewording the exemption specifying what exact types of galvanised steel components are included.

6) Please specify which solution of rewording the current exemption suits you best (a or b) and explain.
7) In order to obtain a comprehensive list of either all applications of galvanised steel that comprise low volume components of more complex geometry please specify these low volume applications as detailed as possible. Please also indicate why the use of lead in these applications is currently not unavoidable.

8) Please provide an estimation of the volume of galvanised steel produced in Europe and used in European automotive applications per year.

9) The main function of galvanisation is corrosion prevention. Information has been provided by stakeholders that corrosion prevention can also be obtained by other coatings e.g. Cr (III) coatings. Please specify the advantages / disadvantages of Cr (III) coatings compared to zinc coatings. What other corrosion prevention techniques are used for steel?

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 material[1], 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.

[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

- 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).