

Annex

Review of Exemption 8(j) Annex II to Directive 2000/53/EC (ELV)

Saint-Gobain Sekurit contribution to the stakeholder consultation

As requested by Öko-Institut, the Saint-Gobain Sekurit contribution to the review process shall be given by answering the questionnaire:

Please explain whether the use of lead in the application exempted 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.

Saint-Gobain Sekurit has already developed technologies for lead-free soldering in/on laminated glass, and consequently a continuation of exemption (j) is not required. Regarding soldering in laminated glass, the first serial solution has been brought to the market already in 2013, and today Saint-Gobain Sekurit is developing various models with lead-free solutions. Further technical solutions have been validated already on industrial scale.

For soldering on laminated glass, a variety of connector technologies have been validated on lab scale. Industrialization will be planned as soon as EC has decided when exemption (j) will end.

In case the substitution of lead is not viable, please explain the efforts you undertook to find a lead-free alternative.

Not applicable – Saint-Gobain Sekurit has solutions available.

Please indicate how much lead would be used under this application and substantiate the amount of lead with a calculation for vehicles put on the European market, and worldwide.

The amount of lead used in the solder depends very much on the type of the connector. Generally speaking, between 3 mg and 48 mg lead per connector are used. According to Saint-Gobain Sekurit information, the worldwide market for laminated glasses with electrical connectors for heating and/or antenna is approximately 4 Mio pieces per year.

Please provide a roadmap towards ELV-compliance if the use of lead is still unavoidable. Please break down the roadmap into steps to be performed, and present and explain the related timelines.

Not applicable – Saint-Gobain Sekurit has solutions available.