



## **Review of exemption 8(j) “Lead in solders for soldering in laminated glazing”**

Antaya Technologies Corporation stakeholder submission for exemption 8(j) of Directive 2000/53/EC

### Questions

- 1. 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.*

Antaya Technologies has developed, tested, and supplies lead free solder alloys for use on and in automotive glass. We believe that the use of lead is avoidable for this application and there is no justification to continue the exemption. Antaya’s lead free alloys are in use on millions of production OEM vehicles, and we have tested our alloys for use in laminated glass successfully with our automotive glass customers. Our lead free solder has several demonstrated benefits over lead based solders for use in laminated glass, especially in regards to melting point and resistance to cracking. Our alloys have been fully industrialized and are in wide commercial use on all connector types for several high volume production vehicles. Our validation time for lead free validation for new OEM programs continues to be 90 days or less, therefore no additional time is required for production readiness to justify continuing or delaying removal of the exemption.

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

Not applicable, a technically and commercially viable lead free alternative is immediately available from at least two suppliers, Antaya Technologies and Saint-Gobain Sekurit.

- 3. 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 under this application varies by connector type. As more vehicles are equipped with features added to laminated windshields, the quantity of lead is sure to rise exponentially. An estimate for the current amount of lead used under this application for European vehicles would be 250 kg while a global use estimate would be 1,000kg.

- 4. 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, Antaya has production ready solutions available, and in production.