

Consultation Questionnaire Exemption No. 8(j)

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

Background

The Öko-Institut together with Fraunhofer IZM has been appointed by the European Commission within a framework contract¹ for the review of exemptions in Annex II of Directive 2000/53/EC (ELV Directive). The aim of this project is to evaluate whether the use of lead in the above mentioned exemption is still unavoidable and the continuation of the exemption is therefore justified in line with Art. (4)(2)(b)(ii) of the ELV Directive.

Exemption 8(j) was reviewed in 2009/2010, and it was found that the use of lead is still unavoidable². The exemption becomes due for review in 2014.

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

¹ Contract is implemented through Framework Contract No. ENV.C.2/FRA/2011/0020 led by Eunomia

² For details see Öko-Institut (2010), page 181 and 182

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.

2 References

- Öko-Institut 2010 Stéphanie Zangl, Martin Hendel, Markus Blepp, Ran Liu, Carl-Otto Gensch, Öko-Institut; Otmar Deubzer, Fraunhofer Institute for Reliability and Microintegration IZM: Adaptation to scientific and technical progress of Annex II to Directive 2000/53/EC (ELV) and of the Annex to Directive 2002/95/EC (RoHS), revised version of the final report, Freiburg, 28 July 2010, retrievable from https://circabc.europa.eu/sd/d/a4bca0a9-b6de-401d-beff-6d15bf423915/Corr_Final%20report_ELV_RoHS_28_07_2010.pdf; last accessed 5 September 2013