

Oeko-Institut e.V.
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Ihr Zeichen

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Ihre Nachricht vom

29.05.2018

Unser Zeichen

MK

Durchwahl 82-

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Datum

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**Review of exemption No. 8(j) in Annex II of Directive 2000/53/EC (ELV)
“Lead in solders for soldering of laminated glazing”
Saint-Gobain Sekurit contribution to the stakeholder consultation**

After the entry into force of the regulation on use of lead in tempered automotive glazing in 2016, today it is still common to use lead-containing solders for the soldering of electrical connectors in or on laminated automotive glazing (e.g. for antenna or heating function). This use is covered by the exemption No 8(j) in Annex II of Directive 2000/53/EC (“ELV Directive”). The European commission has appointed the Oeko-Institut for the review of the exemptions in the above mentioned Annex. Saint-Gobain Sekurit welcomes this consultation, and will provide all support to the industry’s evolution towards no longer use of lead in soldering in/on laminated glazing.

Saint-Gobain’s environmental approach is to ensure the sustainable development of its activities, while controlling the environmental impact of its processes, products and services. The Group thus wishes to ensure the preservation of the environment, to meet the expectations of the stakeholders involved and to offer its customers the greatest value added for a minimum environmental impact. In the sake of the Group’s activities, Saint-Gobain Sekurit is striving to reduce its ecological footprint by a proper choice of materials and to enable sustainable mobility to its customers.

Since the first introduction of a lead free solution in 2013 Saint-Gobain Sekurit has been enriching the portfolio of lead free soldering technologies to cover all known applications. For both, soldering in laminated and on laminated glass, Saint-Gobain Sekurit can offer lead free soldering solutions to all its customers, which are already used in mass production of the automotive industry, today.

Consequently, **a continuation of exemption No. 8(j) is not required.**

Besides the component development and industrialization on the glass manufacturers' side, the component validation on the complete vehicle on the car manufacturers' side has to be considered. Regarding the component aspects, we hope that the information in the annex (questionnaire) provides sufficient information to underline that for Saint-Gobain Sekurit as a glass manufacturer, the use of lead-free solder connections in 2020 is fully possible. Regarding the car manufacturers' validation process, Saint-Gobain Sekurit can provide lead-free prototypes to any car manufacturer, so that validation time can be kept to a minimum.

Saint-Gobain Sekurit is committed to support this consultation and give further information if needed. For questions or queries, please get in contact with Mr. Marc Koelling (marc.koelling@saint-gobain.com; +49 178 2000 860; Saint-Gobain Sekurit Deutschland GmbH & Co. KG, Glasstr. 1, 52134 Herzogenrath, Germany).



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