

## Stakeholder Consultation Questionnaire: Exemption No. 8(j)

### “Lead in solders for soldering of laminated glazing“

#### Background

The Oeko-Institut and Fraunhofer IZM have been appointed by the European Commission, within a framework contract<sup>1</sup>, for the review of exemptions in Annex II of Directive 2000/53/EC (ELV). The aim of this project is to evaluate whether the use of lead in the above mentioned exemption is still unavoidable and if the continuation of the exemption is therefore justified in line with Art. (4)(2)(b)(ii) of the ELV Directive.

In the last review<sup>2</sup>, the consultants concluded that lead-free solutions for soldering applications covered by Exemption 8(j) are available in different development stages. ACEA et al. at that time confirmed that for contacts to wire patterns in the polymer foil between the glass surfaces, lead-free applications were already on the market.

The consultants were aware at the time that lead-free solutions need to be adapted to the specific requirements of individual vehicles, and that this requires time and effort, and possibly further research and development work. An expiry date was therefore set for the exemption in vehicles type-approved after 31 December 2019.

According to the terms of reference of this study, evidence has been relayed to the EU Commission of technical difficulties of phasing-out the use of lead in solders used for soldering of laminated glazing. The exemption is thus to be re-evaluated in order to take into account the latest state of science and technology.

This questionnaire has been prepared for the stakeholder consultation held as part of the evaluation. The objective of this consultation and the review process is to collect and to evaluate information and evidence according to the criteria listed in Art. (4)(2)(b)(ii) of Directive 2000/53/EC (ELV), which you can download from here:

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0053>

Additional background information can be found on the exemption page accessible through the following link: <http://elv.exemptions.oeko.info/index.php?id=70>

If you would like to contribute to the stakeholder consultation, please answer the following questions:

#### Questions

1. Please explain whether the use of lead in the application addressed under Exemption 8(j) of the ELV Directive is still unavoidable so that Art. 4(2)(b)(ii) of the ELV Directive would

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<sup>1</sup> The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

<sup>2</sup> Gensch, Carl-Otto [Oeko-Institut e.V.], et al. 2015

justify the continuation of the exemption. Please take into account the above described background information concerning the result of the last review as far as possible. Please be specific with your answer, for example clarify, if applicable, what types of vehicles your answer refers to, i.e., conventional vehicles and various types of hybrid and electric vehicles and which functionalities the exemption still needs to cover.

2. Please explain the efforts your organisation has undertaken to find and implement the use of lead-free alternatives in the manufacture of laminated glazings for automotive uses. Please refer to alternatives, which at least reduce the amount of lead applied or eliminate its necessity altogether.
3. Please provide a roadmap specifying the necessary steps/achievements in research and development including a time scale for the substitution or elimination of lead in this exemption.
4. What is the amount of lead that would be contained in laminated glazings of vehicles
  - a. placed on the EU market and
  - b. worldwide
 in case the exemption remains valid beyond 2019? Please provide a substantiated estimate clarifying how you have arrived at the stated result.
5. Overall, please let us know whether you agree with the necessity to continue the exemption and sum up your arguments for or against its continuation.

**In case parts of your contribution are confidential, please provide your contribution in two versions (public /confidential). Please also note, however, that requested exemptions cannot be granted based on confidential information!**

**Finally, please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that Oeko-Institut/Fraunhofer IZM can contact you in case there are questions concerning your contribution.**

## References

Gensch, Carl-Otto [Öko-Institut e.V.], et al. (2015): 7th Adaptation to Scientific and Technical Progress of Exemptions 8(e), 8(f), 8(g), 8(h), 8(j) and 10(d) of Annex II to Directive 2000/53/EC (ELV). Report for the European Commission DG Environment under Framework Contract No ENV.C.2/FRA/2011/0020. Unter Mitarbeit von Öko-Institut Yifaat Baron und Otmar Deubzer, Fraunhofer IZM. Freiburg (Adaptation to Scientific and Technical Progress of Annex II Directive 2000/53/EC, ELV IV). Online verfügbar unter [http://elv.exemptions.oeko.info/fileadmin/user\\_upload/Final\\_Report/ELV-Exemptions\\_Amended\\_Final\\_2015-06-29.pdf](http://elv.exemptions.oeko.info/fileadmin/user_upload/Final_Report/ELV-Exemptions_Amended_Final_2015-06-29.pdf), zuletzt geprüft am 10.08.2015.