

# Consultation Questionnaire Exemption 3 of ELV Annex II

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*Copper alloys containing up to 4 % lead by weight*

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## 1. Acronyms and Definitions

Cu	copper
Pb	lead

## 2. Background

Bio Innovation Service, UNITAR and Fraunhofer IZM have been appointed<sup>1</sup> to assist the European Commission in the evaluation of three exemptions currently listed in Annex II of the ELV Directive 2000/53/EC.

The above exemption has become due for review. It was reviewed<sup>2</sup> last time in 2015/2016 under the ELV Directive<sup>3</sup>, and the consultants concluded that the use of lead was still unavoidable. The Commission therefore granted the exemption in line with the requirements of ELV Art. 4(2)(b)(ii). The exemption is due for review in 2021 in order to evaluate it to the state of scientific and technological progress.

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 Directive), 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 review page accessible through the following link: [www.elv.biois.eu](http://www.elv.biois.eu)

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

## 3. Questions

1. Please explain whether the use of lead in copper as addressed under exemption 3 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. In the last review of this exemption, it was found that 4 % of lead addition is still justified.

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<sup>1</sup> It is implemented through the specific contract 070201/2020/832829/ENV.B.3 under the Framework contract ENV.B.3/FRA/2019/0017

<sup>2</sup> Gensch et al. (2016 a): 8th Adaptation to scientific and technical progress of exemptions 2(c), 3 and 5 of Annex II to Directive 2000/53/EC (ELV). Final Report for the European Commission DG Environment under Framework Contract No ENV.C.2/FRA/2011/0020. ELV III.5.

[https://elv.exemptions.oeko.info/fileadmin/user\\_upload/Consultation\\_2014\\_1/20160216\\_ELV\\_Final\\_Gen\\_Ex\\_2c\\_Ex\\_3\\_Ex\\_5.pdf](https://elv.exemptions.oeko.info/fileadmin/user_upload/Consultation_2014_1/20160216_ELV_Final_Gen_Ex_2c_Ex_3_Ex_5.pdf).

<sup>3</sup> European Union 21.10.2000

- a. Which lead-free copper alloys have become available meanwhile besides Ecobrass (c.f. last review)?
  - b. For which applications can these lead-free copper alloys be used?
  - c. For which applications can the content of lead be reduced if the use of lead-free copper is not viable?
2. In the last review, ACEA et al. stated that parts using leaded copper become smaller and smaller. Can such and possibly other parts be 3D-printed thus avoiding the use of lead?
  3. Please explain the efforts your organisation has undertaken to find and implement the use of lead-free alternatives for automotive uses. Please refer to alternatives, which at least reduce the amount of lead applied or eliminate its necessity altogether.
  4. Please provide a roadmap specifying the past and necessary next steps/achievements in research and development including a time scale for the substitution or elimination of lead in this exemption.
  5. What is the amount of lead that would be contained in in vehicles
    - a. placed on the EU market
    - b. worldwidein case the exemption is continued? Please provide at least a rough calculation or substantiated estimate.
  6. Overall, please let us know whether you agree with the necessity to continue the exemption and sum up your arguments for or against the continuation.

**Please note that answers to these questions can be published in the stakeholder consultation, which is part of the evaluation of this request. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.**

**Please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that the project team can contact you in case there are questions concerning your contribution.**