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Comments of the Swedish Chemicals Agency and the Swedish Environmental Protection Agency on the consultation of exemption 2(c)(ii) ELV Directive

The EU legislation should lead the development of new solutions in order to achieve a better protection for human health and the environment. Therefore, we do not see any reason to keep the allowed limit for lead higher than 0.3 %. Additionally, we should not take into account the level of lead in aluminum scrap recycled outside the EU.

The Swedish Chemical Agency and the Swedish Environmental Protection Agency support the proposed threshold of 0.3 %. It is reasonable to lower the threshold as an adaptation to the decreased content of lead in scrapped aluminium, in order to enable recycling and at the same time substitute lead.