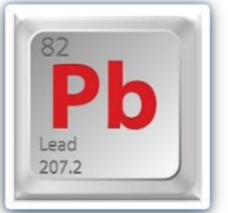


ARGE's Lead (Pb) Reduction Programme: Ambition, project status and outlook

Hans Weissenböck
ARGE General Secretary





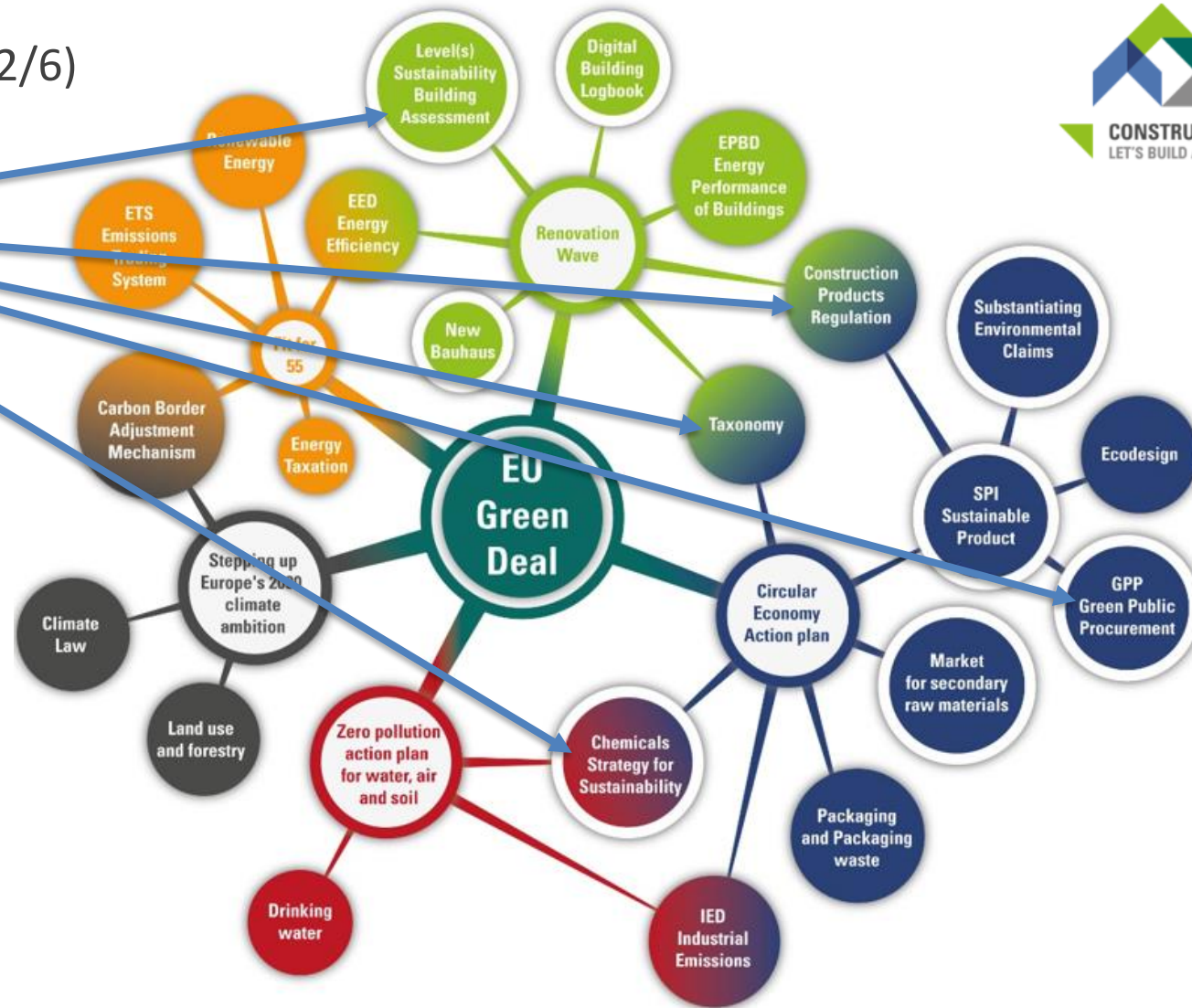
Content

- ➔ Growing legal challenges
- ➔ ARGE's ambition
- ➔ State of play
- ➔ Take away ...

Growing legal challenges (1/6)

- ➔ In the EU **Lead (Pb)** in products has been under certain **restrictions since 15 years**
- ➔ Relevant core legal acts are **REACH Regulation** and **RoHS Directive**
- ➔ Others are e.g., **Waste Framework Directive, Taxonomy Regulation**
- ➔ And there is more to come! **The grip is getting tighter ...**

Growing legal challenges (2/6)



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February 2021 Regulatory Update

EU-REACH: Amendment of Entry 63 of Annex XVII for lead and its compounds in gunshot in or around wetlands

Growing legal challenges (3/6)

- ➔ **Lead (Pb)** in '**keys and locks, including padlocks**' **explicitly allowed** under **REACH** Annex XVII Entry 63 (restriction of lead)
 - ⇒ after 2019/2020 review confirmed indispensability of lead, it will be reviewed in some years again
 - ⇒ progress in reducing the lead content expected by EU law makers – better elimination of lead



Growing legal challenges (4/6)

- ➔ **Lead (Pb)** in **copper alloys up to 4%** in **'electric and electronic equipment'** **explicitly allowed** under **RoHS** Annex III Exemption 6(c)
 - ⇒ for electronic/ mechatronic building hardware exemption will expire July 2024
 - ⇒ RoHS Industry Umbrella Project (UP), supported by ARGE as a partner organisation of UP, filed request for extension of exemption; decision expected in 2023



Growing legal challenges (5/6)

- ➔ **SCIP is the database** operated by the **European Chemicals Agency (ECHA)** for storing and disseminating information on **Substances of Concern In articles as such or in complex objects (Products)** established under the **EU Waste Framework Directive (WFD)**.
- ➔ **Companies supplying articles (products) containing Substances of Very High Concern (SVHC)** in a concentration above 0.1% w/w on the EU market **have been obliged to provide information on these articles (products) to ECHA (SCIP database)** since 5th January 2021. Anyway, ECHA was not able until recently to put the SCIP database into operation for disseminating information.
- ➔ **Lead (Pb) is one of the** presently **219 SVHC**.
- ➔ **ARGE recommendation** on how to efficiently create dossiers in the SCIP database will be provided in October 2021 (sorry for being delayed ...)

Growing legal challenges (6/6)



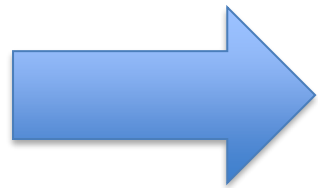
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Call for feedback on the draft reports by the Platform on Sustainable Finance on a social taxonomy and on an extended taxonomy to support economic transition



ARGE's ambition – Rational and role of ARGE

- ➔ **Background: Industry must show progress in reducing the use of lead – EU and national law makers expect it!**
- ➔ **ARGE has taken two roles:**
 - ⇒ Communicating with the European Commission (EC), the European Chemicals Agency (ECHA), and consultants of the EC (directly as well as indirectly through ARGE's partners)
 - ⇒ Supporting companies under the 'ARGE umbrella' by
 - Providing guidance on how to comply with legal requirements
 - developing lead-free and lead-reduced products

ARGE's ambition – Product level

- ➔ **Keys: Reduction** of the lead content in **brass keys** which currently is approx. 2.5% - 3.5% **to a maximum content of 1.5%**, reduction of the lead content in **nickel silver keys to a level below 1%**.
- ➔ **Lock cylinders and brass padlocks: Reduction** of the lead content **is aspired but targets cannot be set at this stage**, due to the complexity of the project.
- ➔ **All other building hardware products should contain lead-free components only.**

State of play (1/3)

- ➔ **ARGE Working Group *Lead (Pb) Reduction* established** (approx. 30 experts in 10 countries, representing 13 companies/ groups)
- ➔ **4 Work Packages determined** – see slide # 12
- ➔ **Principals of work structure defined (compliant with antitrust regulations)** – see slide # 13
- ➔ **Contact with key suppliers of semis (brass rods, brass and nickel silver strips) made**
- ➔ **Identification of potential research partners ongoing**

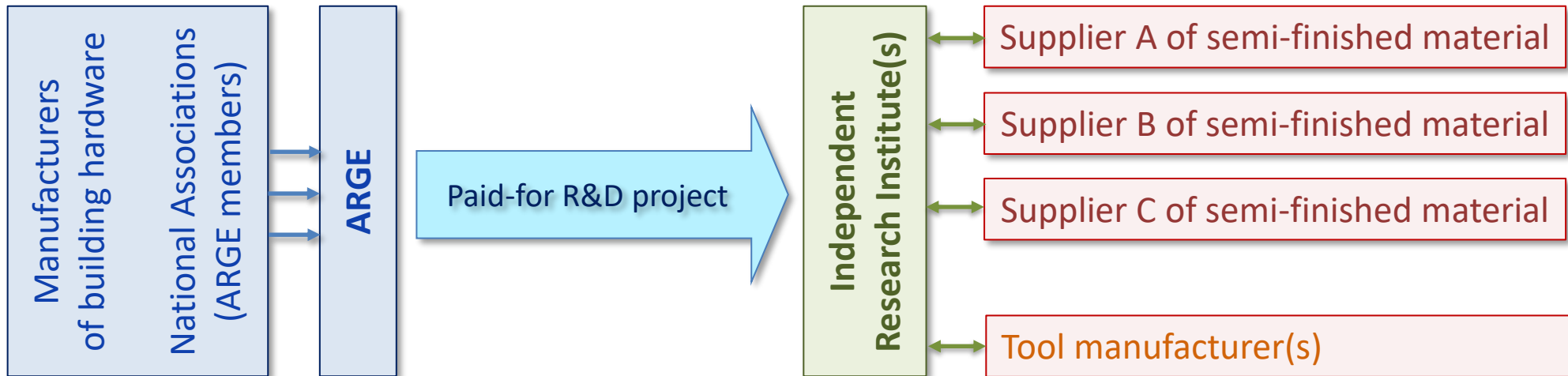
State of play (2/3)

➔ 4 ARGE Work Packages

- ➔ **WP 1: Keys** – Establishing robust test data for lead release in artificial saliva (REACH Annex XVII Entry 63)
Based on ECHA's recommendation, tests will be carried out according to EN 12472:2020, titled 'Method for the simulation of accelerated wear and corrosion for the detection of nickel release from coated items'.
- ➔ **WP 2: Keys** – Reduction of lead content in copper alloy
- ➔ **WP 3: Lock cylinders & padlocks** – Reduction of lead content in copper alloy
- ➔ **WP 4: All other building hardware products** – Compiling and disseminating information relevant for reduction of lead content respectively elimination of lead in products

State of play (3/3)

➔ ARGE Lead (Pb) Reduction Programme WP 2 and WP 3: Compliance with antitrust regulations



Take away from this presentation ...

- ➔ Bringing **lead-containing products** to the market will be increasingly **cumbersome and challenging**
- ➔ **ARGE Working Group** has implemented a **focused programme**
- ➔ **ARGE's ability to deliver** is driven by the **contribution of its members**
- ➔ Concerning **law making** it is important to engage **not only on EU level but also on national levels** with relevant **member states authorities**



Let's take up the



challenge!

Thank you!

Any questions?