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

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Content

- Growing legal challenges
- ARGE’s ambition
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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)

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
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)

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

Manufacturers of building hardware
National Associations (ARGE members)

ARGE

Paid-for R&D project

Independent Research Institute(s)

Supplier A of semi-finished material
Supplier B of semi-finished material
Supplier C of semi-finished material
Tool manufacturer(s)
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?