

# **ELV Annex II Status**

## **(4<sup>th</sup> Adaptation et. al.)**

### **CLEPA IMDS Suppliers Group**

**April 23, 2009**  
**Stuttgart**

**Harald F. Schenk**  
**27 April 2009**

# Stakeholder Consultation

- COMM launched the internet stakeholder consultation on January 26<sup>th</sup>
- Consultation time was just 6 weeks (absolute minimum)
- Consultation ended on March 9<sup>th</sup>, 2009
- **Solder WG meetings for 8a)** continued more frequently (F2F/WEB/AUDIO)
- Some sub WG created to work on special justifications

# Stakeholder Consultation

- **Solder WG group on 8b)** concluded in January/February on an agreed upon test program
- Earlier agreements had been delayed by the OEM or rejected by ANTAYA
- Soldering started on March 3 at VW, followed by testing at VW and BMW
- Tests have been conducted partly successful/partly not yet finalized
- Not all exact test results known yet
- Some tests need to be repeated
- Late agreement/soldering/testing caused risk for delay of consultant assessment

# 4<sup>th</sup> adaptation of Annex II

- Meeting with DG-ENV in February in order to get commitment to the timeline (besides others)
- Commitment from Klaus Kögler
  - to get new Annex II adopted (and published) in Q4 2009
  - depending on final report timeline and COMM internal preparation work , it will be on the TAC Agenda in May
    - for discussion
    - or decision
  - if only for discussion, then decision will be made via „written procedure“ in summer
- Meeting with Oeko-Institute
- Commitment to do all their best to meet their timeline for the final report



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# Stakeholder Consultation

- Industry provided justifications in time, March 6<sup>th</sup>
  - Lead in solder on PCB
  - Lead in solder on carry over parts
  - Lead in HMT solder
  - Lead in press fit connectors
  - Lead in soldering on glass for non-glazing appl.
  - Lead in solder for large power semiconductors
  - Lead in solder in Flip Chip packages
  - Lead in terminals of Al Capacitors
- Lead in solder on glazing



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# Stakeholder Consultation

- Examples:

- HTM solder



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- Press-fit connectors



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- Flip Chip packages



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- Additionally, a study has been provided, showing that

- Current electronics (in overall production) do have only 50% of lead compared to 2003.
- New developments of electronics just introduced or ready to be introduced into series production show even 90% of lead reduction compared to 2003



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# Stakeholder Consultation Assessment

- Consultant is currently in the assessment process
- Additional questions sessions/clarifications are ongoing
  - 2 additional question rounds round on 8a)
  - none on 8b)
  - there is more to come
- A F2F meeting is still planned to clarify the remaining open issues

# Stakeholder Consultation Assessment Situation for 8b)

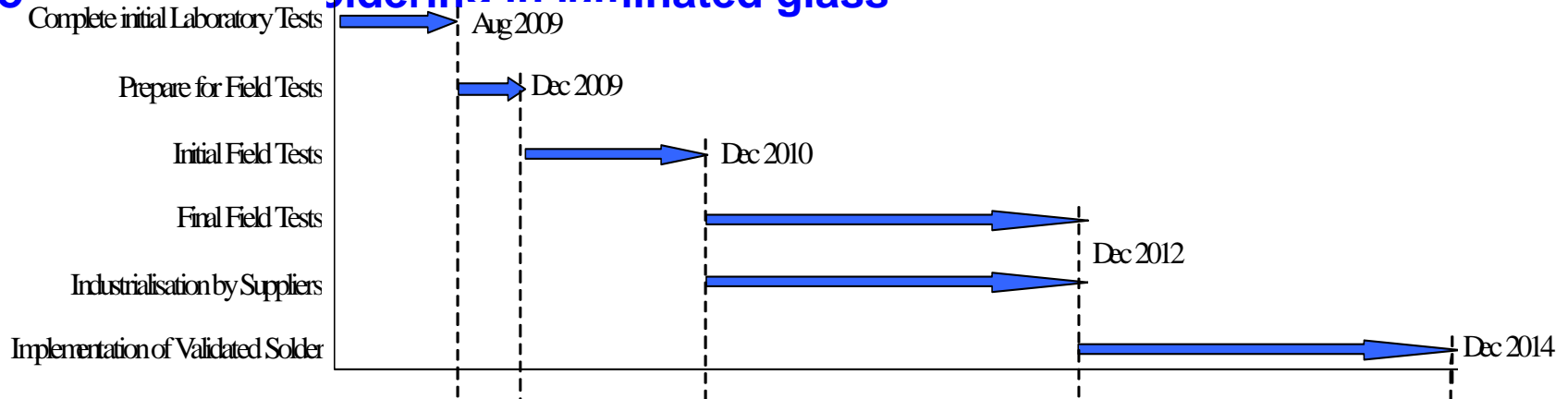
There are two possible scenarios for the outcome of the joint solder tests

- It is proven that the solder does not meet the requirements of the European Market
- The results are positive and the solder does meet the requirements of the European Market

If the first scenario (failure) materializes then it is impossible to propose a roadmap

If the second scenario (pass) materializes then a possible roadmap can be proposed.

## No solution for soldering in laminated glass





# Meeting with DG-ENTR

6<sup>th</sup> April 2009

## Annex II

- 4<sup>th</sup> Adaptation
- New exemption requests
- TEG



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## **4<sup>th</sup> adaptation of Annex II**

### **Next Steps of OEKO-Inst. and DG-ENV**

- **Timeline for the revision (as scheduled by DG-ENV)**
  - **First draft report available by early May**
  - **Discussion at TAC Meeting on May 11<sup>th</sup> 2009**
    - **more or less substantial, depending on report**
  - **Final report available by mid June**
  - **COMM inter-service consultation (3-4 weeks June/July)**

# 4<sup>th</sup> adaptation of Annex II

## Next Steps of OEKO-Inst. and DG-ENV

- **Timeline for revision, ctd.** (as scheduled by DG-ENV)
  - COMM proposal to the MS for voting in the Sept. 9<sup>th</sup> TAC meeting by mid July  
(written procedure, as committed early by DG-ENV is not in scope anymore)
  - **Decision in the TAC meeting Sept. 9th, 2009**
  - Followed by EP scrutiny Sept. 2009
  - **Final publication end Q4 2009**

# New exemption requests

- New exemptions
  - need to be requested at the EU COMM directly
  - need to be treated in a separate process
    - stakeholder consultation
    - neutral assessment
  - cannot be included into the current „solder revision“
  - Currently are two requests known
    - lead in solder for fine wire (e.g. loudspeakers)
    - TEG (Thermo-Electric Generator)

# New exemption requests

- TEG is a common industry request
  - is an urgent issue
  - has been provided to the EU COMM (DG ENV)
  - support of the TAC members requested
  - should be part of discussion in the May TAC meeting
  - Decision in TAC asap (September 2009?)

# Annex II Revision Lobbying Activities

- ACEA(JAMA/KAMA/CLEPA letters has been sent to all TAC members asking for support:
  - for a quick decision for the solder exemption
  - for inclusion of a new exemption (TEG) in Annex II
- Lobbying is kicked off/ongoing according to a Lobbying matrix
  - Mainly via the nat. associations with support from OEM
  - E.g. Germany /France next week
  - Poland ask yesterday/UK yesterday
  - Austria, Spain, Italy, etc early May
  - etc.



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# ELV Directive Annex II Revision – Status April 2009

## Stakes

- High planning uncertainty and legal non-compliance for environmental and safety relevant electric/electronic and glazing equipment by 2011
- Detrimental for phase-in of CO2 reduction technologies

## Status

- Joint activities ACEA JAMA KAMA CLEPA
- 4th Annex II revision, comitology
- New expiry dates (end 2010 for new vehicle types) for lead in solder in electric/electronic applications, and lead in glazing
- No alternatives due to technical and timing reasons
- Limited environmental benefit vs. planning uncertainty and high costs
- Technical Adaptation Committee discussion 11th May

## Targets

- Short term: obtain positive TAC decision at earliest possible date:
  - Unlimited exemptions for technical 'no gos'
  - 2015 for other applications
- Mid term: apply better regulation

# How will this story go on?

- Stakeholder Consultation
  - for a subset of current Annex II exemptions
    - most likely those with an unlimited
  - for the „new“ exemption requests
- Neutral assessment
- COMM proposal, Lobbying, ....
- .... TAC Decision, Scrutiny, Publication .....
- .... **A never-ending story**

Thank you very much for your attention!!



# BACK-UP

# Type Approval

## Definition of Vehicle Type, Variant and Version

### ■ Type (no difference in ...)

- manufacturer
- type designation by manufacturer
- essential aspects of construction Details
  - chassis / floor pan
  - power plant  
(internal combustion/electric/hybrid)

### ■ Variant (no difference in ...)

- body style
- power plant
- powered axles (number, position, interconnection)
- steered axles (number and position)

### ■ Version

- trim level
- wheel base
- mass of vehicle in running order / dry weight
- techn. perm. max. laden mass
- techn. perm. max. mass on each axle
- gear box
- axle ratio
- rolling radii (tyre group)
- number of seats