

What types of vehicle components are made from copper alloys?

The European Automobile Manufacturers' Association estimates that approximately 500 mostly tiny components made from lead-containing copper alloys are present in a fully equipped vehicle. Typical applications include: pinions, shift forks, valve stems, connector pins, battery clamps, door locks, bearings, fittings for fuel injection systems and more.



How long will the exemption be granted for copper alloys containing lead?

Under Article 4(2)(b), exemptions covered by Annex II are subject to review on a regular basis to determine if they are still justified. Since the directive was implemented, the European Commission and industry stakeholders have acknowledged that there are no suitable alternative materials that can satisfy the diverse performance requirements of such a wide array of vehicle components. Thus, the use of lead-containing copper alloys cannot be avoided and the exemption is justified. The last review of Exemption 3 was completed in 2016/2017 which concluded that the use of lead in copper alloys was still unavoidable. The reviewers recommended conducting the next review in five years.

The exemption for copper alloys is up for review in 2021. What is the current status?

The European Commission contracts a consortium of independent consultants to provide technical assistance for the evaluation of exemptions. The consortium solicits input from relevant stakeholders during the review and issues a formal recommendation to the Commission to extend, amend or reject the exemption. The European Automotive Manufacturers' Association (ACEA) is leading the effort to gather feedback from industry for the public stakeholder consultation which closes on December 8, 2020. ACEA is collecting input through a brief questionnaire that can be accessed at the following link: <https://bit.ly/2GQCfKk>

After all stakeholder comments are received, the consortium will conduct its review of Exemption 3 and make a recommendation to the Commission. Timing is unclear, but based on previous cycles, the review is expected to take anywhere from 6 to 18 months. After the Commission receives the recommendation, additional time will be required to make a decision and publish the findings in the Official Journal of the EU.

For more information on the evaluation process for exemption requests under the ELV Directive, including Exemption 3, visit: <http://www.elv.biois.eu/>



Who can I contact for more information?

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