ARGE Lead (Pb) Reduction Programme

State of play and input for deciding upon how to proceed

ARGE Online Meeting on 29th April 2021

Decisions made at the meeting are shown on slide **9**

Hans Weissenböck (ARGE General Secretary)

What we will address in this meeting …

- **Letter to members of ARGE, dated 2nd April 2021**
  - Are there any questions and/or remarks?

- **The 4 Work Packages – brief recap**
- **Invitation to participate**
  - Experts nominated

- **How to proceed – suggestion, discussion and conclusions**

Letter to members of ARGE, dated 2nd April 2021

2nd April 2021

To the members of ARGE

ARGE Lead (Pb) Reduction Programme

Update and next steps | Invitation to participate in Working Group

This bulletin provides both, an introduction into the subject and an update on where we stand in preparing and ramping up ARGE's Lead (Pb) Reduction Programme.

It also contains an invitation to participate in the ARGE Working Group *Lead (Pb) Reduction*.

ARGE's members, the National Associations, are kindly asked to reach out to their members and invite those companies for which the heavy metal lead in building hardware is a relevant topic to participate in the ARGE Working Group *Lead (Pb) Reduction*.

1. Lead in building hardware

Lead is not only used as an addition in copper alloys of which lock cylinders, padlocks and keys are made, it also can be contained in machining steel and aluminium alloys used for certain components of building hardware products. Such products can be e.g., door closers, all sort of locks, window furniture, sliding door gear.

Whilst for most lead-containing alloys alternatives without lead have been developed, no lead-free copper alloys for lock cylinders, padlocks and keys are available yet which are technically and commercially feasible.

2. Legal challenges with lead

ARGE's focus is on European Union's respective legal framework. When referring to EU legislation it has to be taken into account that EU regulations and directives are relevant not only for EU member states, but also the other member states of the European Economic Area (EEA), namely Norway, Iceland, and Liechtenstein. A brief intro into the most relevant EU legislation concerning lead and the impact on building hardware is given below.

a. EU REACH Regulation

- What is REACH ?

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. As REACH is an EU regulation, it applies automatically and uniformly to all EU (EEA) member states, without the need to be transposed into national law. Despite the reference to chemicals in its name, REACH covers all type of substances, as, e.g., lead and its compounds.

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Any questions and/or remarks?

Work Packages – brief recap

- **WP 1:** **Keys** – Establishing robust test data for lead release in artificial salvia (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

Invitation to participate in Working Group / Work Packages

➲ **Experts have been nominated by**

- AFACE (ES)
- ASSOFERMA (IT)
- BGSB (AT)
- DHF (NL)
- FFTI (FI)
- VSSB (CH)
- ASSA ABLOY, CES, DOM Security, and dormakaba nominated experts directly (at least partially)

➲ **No feedback received yet from**

- DHF (UK)
- FVSB (DE)
- MEZA (CZ)
- SEM Group (SE)
- UNIQ (FR)
- ZPOB (PL)

Post-meeting note:

All National Associations have replied in the meantime.

How to proceed – suggestions, discussion and conclusions (1/3)

➲ Suggestions

➲ **Work Package 1:** *Lead (Pb) migration of keys*

- Define test design
- Define which test lab shall be appointed to carry out tests according to EN 12472:2020 ('Method for the simulation of accelerated wear and corrosion for the detection of nickel release from coated items')
- All participating companies should provide their keys to be tested directly to the test lab and will receive their respective test results; ARGE will receive copies of the test results and anonymise, consolidate and disseminate all results
- Migration test will be done not only in relation to lead (Pb) but also for nickel (Ni)
- Test costs (approx. € 90.- per test) shall be borne by the companies supplying their keys for testing

➲ Discussion and conclusions

How to proceed – suggestions, discussion and conclusions (2/3)

➲ Suggestions

- ➲ **Work Package 2:** *Lead (Pb) reduction in keys* and **Work Package 3:** *Lead (Pb) reduction in lock cylinders and padlocks*
  - Define test design
  - Define financing (as ARGE will have to be contractual partner of the research institute(s) due to antitrust regulations, ARGE could either pass on the respective cost to National Associations or to the participating companies)
  - Define which research institute(s) shall be appointed

➲ Discussion and conclusions

How to proceed – suggestions, discussion and conclusions (3/3)

➲ Suggestions

- ➲ **Work Package 4:** *Lead (Pb) reduction in all other building hardware products*
  - Define for which products information shall be compiled and disseminated

➲ Discussion and conclusions

➲ One last question:

- ➲ As the use of lead (Pb) is impacted by a growing number of EU Regulations and Directives – one of the latest being the ***EU Taxonomy Regulation*** *) – ARGE could organise a webinar providing an overview on this regulatory ecosystem. Is there in interest in such a webinar?

*) **Information about the Regulation (EU) 2020/852 (Taxonomy) on the establishment of a framework to facilitate sustainable investment**

Decisions made at the meeting

1. **Further procedure concerning Work Packages 1, 2, 3, and 4**
   - Suggestions as outlined on slides 6, 7, and 8 were approved.

2. **Question whether ARGE should offer a webinar providing an overview on the regulatory ecosystem in relation to lead (Pb)**
   - Participants did not see the need for such webinar at present.
   - ARGE's offer to support members – also individually – in this matter remains valid.