

Call for evidence on the review of lead in Consumer Articles

Background document

ECHA has been requested by the Commission on 20/05/2019 to evaluate the current restriction on lead in consumer articles by 4 November 2019¹. Pursuant to paragraph 9 of entry 63 of Annex XVII to REACH, the Commission must re-evaluate the current restriction for lead in certain articles supplied to the general public and based on this re-evaluation, if appropriate, modify the entry accordingly.

More specifically the re-evaluation refers to:

- Assessing the availability and suitability of analytical methods to determine that the rate of lead release from articles (coated or uncoated) does not exceed the limit of 0.05 micrograms/cm² per hour.
- Assessing that the coatings mentioned in paragraph 7 are sufficient to ensure that the release rate of lead is not exceeded for a period of at least two years of normal and reasonably foreseeable conditions of use of the article. The suitability of the wear test method EN 12472:2005+A1:2009, as well as the availability of other methods, to determine coating integrity of articles containing lead should be subjected to expert assessment. The Commission services will assist ECHA in identifying experts in this field.
- Assessing new scientific information including on the availability of alternatives to lead in articles listed in paragraph 8(e) keys and locks, including padlocks, (f) musical instruments, (i) religious articles and (j) portable zinc-carbon batteries and button cell batteries. The resulting report should include an assessment of the frequency and content of lead in these articles, of the technical function provided by lead in these and on the availability of alternative substances or technologies that would advise the reconsideration of these derogations from paragraph 7.
- A quantitative assessment of the possible socio-economic consequences associated to potential removal of these derogations should be provided as well a clear and motivated recommendation in order to allow the Commission services to decide whether to review or maintain the derogations.

This Call for evidence does not replace the public consultation organised by ECHA at the start of any restriction process, if a restriction proposal is submitted.

The objective of this call for evidence is to gather concrete information on the subject outlined above. To this end, we are looking for technical information on the following questions:

- a. What is your experience with analytical methods for determining that the rate of lead release from articles (coated or uncoated) does not exceed the limit of 0.05 micrograms/cm² per hour?
- b. How would you describe the availability and suitability of these analytical methods?
- c. How often and in what quantity is lead used in the following articles:
 - a. keys and locks, including padlocks,
 - b. musical instruments

¹ https://echa.europa.eu/documents/10162/13641/echa_lead_commission_request_en.pdf.pdf/e22ef185-ea04-d1f8-4e12-06d86c956b05

- c. religious articles and
 - d. portable zinc-carbon batteries and button cell batteries?
- d. What technical functions does lead provide in these articles?
 - e. What are the available alternative substances or technologies to lead or its compounds used in the articles referred to above?
 - f. What would be the potential socio-economic consequences associated with a restriction on the use of lead in the articles listed above?

Additional relevant information for the purpose of the evaluation is also welcome.

This call for evidence targets interested parties such as companies (manufacturers, suppliers, distributors, importers etc.), trade associations, scientific bodies and any other stakeholders holding relevant information. Information can be submitted confidentially and will be treated as such by ECHA.

ECHA invites interested parties to respond to the call for evidence by 19 September 2019. For any clarifications on the call for evidence, please contact: restriction@echa.europa.eu