

Comments and references to responses on ECHA's 6th Draft Recommendation for Pentalead tetraoxide sulphate (EC number: 235-067-7)

The present document compiles the comments received during the public consultation on the draft 6th recommendation for inclusion of substances in Annex XIV of REACH for Pentalead tetraoxide sulphate (EC number: 235-067-7). The public consultation took place between 1 September and 1 December 2014. Some of the comments submitted contained additional attachment(s), accessible at http://echa.europa.eu/documents/10162/13640/6th_rec_comref_attachments_pentalead_tetraoxide_sulphate_en.zip. Those comments are indicated accordingly in the table below.

For each of the comments there is also a reference to specific section(s) of a document containing the responses to comments ("Response document", available at http://echa.europa.eu/documents/10162/13640/6th_axiv_rec_response_doc_lead_substances_en.pdf). The responses in the Response document are arranged by thematic block and level of information (see more detailed explanations at the beginning of that document).

PUBLIC VERSION

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I - General comments on the recommendation to include the substance in Annex XIV

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2526 2014/11/05	REHAU AG + Co., Company, Germany	This substance was used in the past as a stabilizer for PVC and this use will end in 2015 latest. It will be part of post consumer recycling material (recycled PVC)unavoidably.It is impossible to know which lead compound is contained in the recycled material if a	A.2.22. Reconsider inclusion in Annex XIV

		content of lead is found. Considering this fact in mind it is undesirable to include this special lead containing substance in Annex XIV. It is impossible to decide with bearable costs whether this substance is contained or not contained within post consumer recycle.	because of the impact on the recycling of PVC materials
2544 2014/11/17	Berzelius metall GmbH, Company, Germany	We support the comments submitted in this section by the International Lead Association on behalf of the Pb REACH Consortium	See responses referred to in comment #2606 in this section.
2568 2014/11/21	Germany, Member State	<p>We still have doubts about the proportionality and the regulatory effectiveness of inclusion of further lead substances into Annex XIV. Lead substances are already highly regulated in various legislative acts (e.g. Battery Directive (2006/66/EG), End of Life Vehicle Directive (2000/53/EC), RoHS Directive (2011/65/EU)).</p> <p>Further regulation of lead compounds by listing them in Annex XIV should be reflected in the light of climate protection efforts in Germany: promotion of batteries for storing renewable energy.</p> <p>Additionally, for the use of lead compounds as stabiliser in PVC industry has started a self-commitment to phase out the use of lead compounds completely until 2015. Therefore, the outcome of the self-commitment should be awaited before initiating further risk management measures.</p> <p>A high number of authorisation applications for the lead compounds can be expected due to the high volumes and the use spectrum of the substances. Authorisation could therefore lead to a high workload for these highly regulated substances.</p> <p>Regarding this we request ECHA to further analyse the benefits of prioritising these already highly regulated lead substances for Annex XIV inclusion at the current stage. Based on the results of this analysis the best way forward for should be discussed.</p>	A.2.16. Ask ECHA to assess/ Question the regulatory effectiveness of inclusion of lead substances in AXIV and stresses the high workload for authorities related to these substances at AfA stage
2606 2014/11/24	Pb REACH Consortium managed by the International Lead Association-Europe, Industry or trade	<p>The response to this question has been provided by the Pb REACH Consortium uploaded in section IV of this public consultation.</p> <p>2606_ECHA public consultation instructions pentalead tetroxide sulphate 241114.pdf</p>	A.2.3. Ask ECHA to reconsider the priority scoring for pentalead tetraoxide sulphate /

	<p>association, United Kingdom</p>		<p>Lower WDU score proposed</p> <p>A.2.8. Claim the use in the production of batteries as intermediate</p> <p>A.2.18. Ask ECHA to consider the fact that the use of lead-stabilisers in PVC is currently being phased-out</p> <p>B.1.1. General principles for setting latest application dates / sunset dates: 3. ECHA's proposal for latest application dates</p> <p>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates: 1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p>
<p>2627</p>	<p>EUROBAT,</p>	<p>The Lead REACH Consortium has submitted comments in response to this section and</p>	<p>A.2.8. Claim the use in</p>

2014/11/25	Industry or trade association, Belgium	<p>EUROBAT supports their response.</p> <p>2627_EUROBAT and Lead REACH consortium - Exemption Request document - final 251114.pdf</p>	<p>the production of batteries as intermediate</p> <p>C.2.1. Requests for Art. 58(2) exemptions</p> <p>See also responses referred to in comment #2606 in this section.</p>
2723 2014/11/27	Exide Technologies, Company, Germany	<p>The Pb REACH Consortium has submitted comments in response to this section and Exide Technologies supports their response.</p>	<p>See responses referred to in comment #2606 in this section.</p>
2733 2014/11/27	WirtschaftsVereinigung Metalle, Industry or trade association, Germany	<p>WirtschaftsVereinigung Metalle (WVM), the German Non-Ferrous Metals' Association, represents the German non ferrous (NF) metals industry towards politics and economy. We support our members in regulatory, occupational health & safety affairs in order to maintain and establish measures at a very high level. Today, WVM has 660 member companies, including producers and users of lead compounds.</p> <p>In principle, we appreciate the involvement of stakeholders in the process of including substances in Annex XIV of REACH and would like to take the opportunity to bring our argumentation forward during this phase of internet consultation.</p> <p>We want to express the companies' awareness of their duties in safe handling hazardous substances and in establishing appropriate risk management measures. Industry also takes full responsibility to fulfil their obligations under the relevant Community and national legislation.</p> <p>Furthermore we support the comments submitted in this section by the International Lead Association on behalf of the Pb REACH Consortium.</p>	<p>See responses referred to in comment #2606 in this section.</p>

<p>2784 2014/11/28</p>	<p>WKÖ, Other contributor, Austria</p>	<p>See PDF attached. 2784_su_86_WKÖ Bleiverbindungen.pdf</p>	<p>A.2.16. Ask ECHA to assess/ Question the regulatory effectiveness of inclusion of lead substances in AXIV</p> <p>A.2.8. Claim the use in the production of batteries as intermediate</p> <p>C.1.1. General principles for exemptions under Art. 58(2)</p> <p>C.2.1. Requests for Article 58(2) exemptions</p> <p>A.2.17. RMOA conducted by one MS concluded that no further regulatory actions is needed (before 2015)</p>
<p>2822 2014/11/28</p>	<p>Norway, Member State</p>	<p>In general, the Norwegian REACH CA supports measures that will reduce the use and emission of lead and lead compounds. We do also support grouping of lead substances to avoid substitution with substances with similar properties within the same use categories. We support that on the basis of the prioritisation criteria and grouping considerations,</p>	<p>Thank you for your comment.</p>

		pentalead teraoxide sulphate should be prioritised for inclusion in Annex XIV.	
2862 2014/11/28	Individual, Germany	The Pb REACH Consortium has submitted comments in response to this section and HOPPECKE supports this response.	See responses referred to in comment #2606 in this section.
2871 2014/11/28	Regional or local authority, United Kingdom	Lead (and its compounds) is a Priority Substance under the Water Framework Directive. Member States need to demonstrate decreasing concentrations in the water environment (beyond natural background levels). Some of the uses identified in the background document may result in releases to waste water. In Scotland the main point source of (bioavailable) lead for the water environment seems to be from municipal waste water treatment plants; anthropogenic diffuse sources will also play a role in environmental water concentrations. The major uses of lead monoxide (in battery production) is not likely to result in high releases to the water environment. Use as a stabiliser in PVC may, but this use is being voluntarily phased out.	A.1.5. Aspects not considered in ECHA's prioritisation: 2. Aim & proportionality of authorisation system - Authorisation is not a ban
2898 2014/11/30	Johnson Controls Autobatterie GmbH & Co. KGaA, Company, Germany	The Pb REACH Consortium has submitted comments in response to this section and Johnson Controls Autobatterie GmbH & Co. KGaA based in Hannover, Germany, supports their response.	See responses referred to in comment #2606 in this section.
2903 2014/11/30	Johnson Controls Autobatterie spol. s r.o., Company, Czech Republic	The Pb REACH Consortium has submitted comments in response to this section and Johnson Controls Autobatterie spol. s r.o. based in Česká Lípa, Czech Republic, supports their response.	See responses referred to in comment #2606 in this section.
2909 2014/11/30	Johnson Controls Autobaterías, S.A , Company, Spain	The Pb REACH Consortium has submitted comments in response to this section and Johnson Controls Autobaterías, S.A based in Madrid, which operates two battery production sites in Burgos and Guardamar del Segura (Alicante), Spain, supports their response.	See responses referred to in comment #2606 in this section.
2914 2014/11/30	Johnson Controls Sachsen-Batterien GmbH & Co. KG, Company, Germany	The Pb REACH Consortium has submitted comments in response to this section and Johnson Controls Sachsen-Batterien GmbH & Co. KG based in Zwickau, Germany, supports their response.	See responses referred to in comment #2606 in this section.
2918	Johnson Controls	The Pb REACH Consortium has submitted comments in response to this section and	See responses referred to

2014/11/30	Recycling GmbH, Company, Germany	Johnson Controls Recycling GmbH based in Buchholz, Germany, supports their response.	in comment #2606 in this section.
2981 2014/12/01	ACEA, Industry or trade association, Belgium	The Pb REACH Consortium has submitted comments in response to this section and ACEA supports their response.	<p>A.1.5. Aspects not considered in ECHA's prioritisation:</p> <p>2. Aim & proportionality of authorisation system - Authorisation is not a ban</p> <p>3. Use specific scrutiny foreseen at application stage</p> <p>5. Availability of suitable alternatives</p> <p>6. Socio-economic benefits of continued use</p> <p>7. Burden for industry and potential competitive disadvantage</p> <p>A.2.8. Claim the use in the production of batteries as intermediate</p> <p>A.2.12. Claim the use in the manufacture of technical ceramic materials as intermediate</p> <p>A.2.19. Predictability of including</p>
		2981_20141201 ACEA Comments Authorisation Lead compounds.pdf	

			<p>substances in Annex XIV</p> <p>A.2.24. Raising the need to use a certain substance in past model parts and/or in low volumes</p> <p>B.1.1. General principles for setting latest application dates / sunset dates: 3. ECHA's proposal for latest application dates</p> <p>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates: 1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users) 2. Lack of alternatives, socio-economic aspects</p> <p>C.1.1. General principles for exemptions under Art. 58(2)</p>
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			<p>C.1.3. Aspects not justifying an exemption from authorisation</p> <p>C.2.1. Requests for Art. 58(2) exemptions</p> <p>See also responses referred to in comment #2606 in this section.</p>
2983 2014/12/01	Individual, Italy	The Pb REACH Consortium has submitted comments in response to this section and FIAMM SPA supports their response.	See responses referred to in comment #2606 in this section.
2993 2014/12/01	ELSA (ESPA), Industry or trade association, Belgium	<p>The use of lead-based stabilisers (including the above mentioned substance) for the production of articles made in PVC is subject to a voluntary phase out from the EU-28 that will be completed by end of 2015. See www.vinylplus.eu. As such Authorization for the placing of the a.m. substance on the EU market will become without object after this date.</p> <p>However the a.m. substance may still be present as so-called "legacy additives" in recycled PVC made from articles produced before completion of the phase-out. In the current regulatory framework, recycling of plastics containing legacy substances included in the Authorization list implies to have those substances Authorized. Considering the huge socio-economic impact that this would have (see further down) ELSA wishes to highlight that the a.m. substance should be exempted from Authorisation on the basis of Reach Art. 58.2 , as developed in the request hereunder.</p> <p>The issue and impact of Authorization for recycled PVC is detailed in the comments submitted by VinylPlus to the EU COM Public Consultation, comments that we support. They are attached as a separate file: < Lead substances proposed for authorisation comments-VinylPlus 20141114.pdf></p> <p>Appendix</p>	<p>A.2.18. Ask ECHA to consider the fact that the use of lead-stabilisers in PVC is currently being phased-out</p> <p>A.2.22. Reconsider inclusion in Annex XIV because of the impact on the recycling of PVC materials</p> <p>A.1.5. Aspects not considered in ECHA's prioritisation:</p>

		<p>ELSA, the European Lead Stabilisers Association, is a sub-Association of ESPA, the European Stabilisers Producers Association www.stabilisers.eu ELSA is an associated member of ILA Europe, the International Lead Association – Europe</p> <p>The following companies are members of ELSA:</p> <p>ASUA (Spain) Baerlocher (Germany) Chemson Polymer Additives (Austria) IKA (Germany) Reagens (Italy)</p> <p>2993_Lead substances proposed for authorisation comments-VinylPlus 20141114.pdf</p>	<p>2. Aim & proportionality of authorisation system - Authorisation is not a ban 7. Burden for industry and potential competitive disadvantage</p> <p>C.1.1. General principles for exemptions under Art. 58(2)</p> <p>C.1.3. Aspects not justifying an exemption from authorisation</p> <p>C.2.1. Requests for Art. 58(2) exemptions</p>
<p>2998 2014/12/01</p>	<p>ZVEI, Industry or trade association, Germany</p>	<p>The Pb REACH Consortium has submitted comments in response to this section and the ZVEI supports their response.</p> <p>The 'ZVEI - German Electrical and Electronic Manufacturers' Association' promotes the industry's joint economic, technological and environmental policy interests on a national, European and global level. The ZVEI represents more than 1,600 companies, mostly SMEs. The sector has 838,000 employees in Germany plus 692,000 employees all over the world. In 2013 the turnover was approximately €167 billion. More than 20 percent of all industrial R+D spending comes from this industry.</p> <p>The German battery industry is a central building block for the manufacturing and research location Germany, delivering key technologies for the future. It develops reliable and powerful storage systems for a wide range of industry sectors, e.g. the electrical industry, engineering, automobile industry, medical engineering and the energy sector. The German battery industry employs over 8,000 workers and has an annual turnover of €1.8 billion.</p>	<p>See responses referred to in comment #2606 in this section.</p>

II - Transitional arrangements. Comments on the proposed dates

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2526 2014/11/05	REHAU AG + Co., Company, Germany	The virgin substance will not be used as a PVC-stabilizer any more after end of 2015. But it will be contained in recycled PVC for at least the next 30 years.	<p>A.1.5. Aspects not considered in ECHA's prioritisation: 2. Aim & proportionality of authorisation system - Authorisation is not a ban</p> <p>A.2.22. Reconsider inclusion in Annex XIV because of the impact on the recycling of PVC materials</p>
2606 2014/11/24	Pb REACH Consortium managed by the International Lead Association-Europe, Industry or trade association, United Kingdom	The response to this question has been provided by the Pb REACH Consortium uploaded in section IV of this public consultation. 2606_ECHA public consultation instructions pentalead tetroxide sulphate 241114.pdf	See responses referred to in comment #2606 in section I.
2627 2014/11/25	EUROBAT, Industry or trade association, Belgium	The Lead REACH Consortium has submitted comments in response to this section and EUROBAT supports their response. 2627_EUROBAT and Lead REACH consortium - Exemption Request document - final 251114.pdf	See responses referred to in comments #2606 and #2627 in section I.
2723 2014/11/27	Exide Technologies, Company, Germany	The Pb REACH Consortium has submitted comments in response to this section and Exide Technologies supports their response. In addition, as a battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	See responses referred to in comment #2606 in section I.

2733 2014/11/27	Wirtschaftsvereinigung Metalle, Industry or trade association, Germany	Also in this respect WVM supports the arguments brought forward.	See responses referred to in comment #2606 in section I.
2784 2014/11/28	WKÖ, Other contributor, Austria	See PDF attached. 2784_su_86_WKÖ Bleiverbindungen.pdf	See responses referred to in comment #2606 in section I.
2822 2014/11/28	Norway, Member State	In general, we are in favour that a regulation should enter into force as soon as possible. Hence we are in favour of the shortest LAD slot.	Thank you for your comment.
2862 2014/11/28	Individual, Germany	The Pb REACH Consortium has submitted comments in response to this section and HOPPECKE has supports their response. In additional, as a battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (Please see next section)	See responses referred to in comment #2606 in section I.
2898 2014/11/30	Johnson Controls Autobatterie GmbH & Co. KGaA, Company, Germany	The Pb REACH Consortium has submitted comments to this section. Johnson Controls Autobatterie GmbH & Co. KGaA based in Hannover, Germany, supports their response. In addition as battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	See responses referred to in comment #2606 in section I.
2903 2014/11/30	Johnson Controls Autobaterie spol. s r.o., Company, Czech Republic	The Pb REACH Consortium has submitted comments to this section. Johnson Controls Autobaterie spol. s r.o. based in Ceská Lípa, Czech Republic, supports their response. In addition as battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	See responses referred to in comment #2606 in section I.
2909 2014/11/30	Johnson Controls Autobaterías, S.A , Company, Spain	The Pb REACH Consortium has submitted comments to this section. Johnson Controls Autobaterías, S.A based in Madrid, which operates two battery production sites in Burgos and Guardamar del Segura (Alicante), Spain, supports their response. In addition as battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	See responses referred to in comment #2606 in section I.
2914	Johnson Controls	The Pb REACH Consortium has submitted comments to this section. Johnson Controls	See responses referred to

2014/11/30	Sachsen-Batterien GmbH & Co. KG, Company, Germany	Sachsen-Batterien GmbH & Co. KG based in Zwickau, Germany, supports their response. In addition as battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	in comment #2606 in section I.
2918 2014/11/30	Johnson Controls Recycling GmbH, Company, Germany	4. The Pb REACH Consortium has submitted comments to this section. Johnson Controls Recycling GmbH based in Buchholz, Germany, supports their response. In addition we believe in good reason that an exemption for this substance from a potential authorization requirement should be given (please refer to the next comment).	See responses referred to in comment #2606 in section I.
2981 2014/12/01	ACEA, Industry or trade association, Belgium	The Pb REACH Consortium has submitted comments in response to this section and ACEA supports their response. 2981_20141201 ACEA Comments Authorisation Lead compounds.pdf	See responses referred to in comments #2606 and #2981 in section I.
2983 2014/12/01	Individual, Italy	The Pb REACH Consortium has submitted comments in response to this section and FIAMM SPA supports their response. In addition, as a battery producer we believe in good reason to get an exemption for this substance from a potential authorization requirement (please refer to the next comment).	See responses referred to in comment #2606 in section I.
2993 2014/12/01	ELSA (ESPA), Industry or trade association, Belgium	2993_Lead substances proposed for authorisation comments-VinylPlus 20141114.pdf	See responses referred to in comment #2606 in section I.

III - Comments on uses that should be exempted from authorisation, including reasons for that

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2526 2014/11/05	REHAU AG + Co., Company, Germany	Use of recycled PVC containing the substance should be exempted because the substance cannot be removed from recycled PVC. The necessity to ask for an authorisation for the use of recycled PVC containing the substance would be the end of post consumer recycling process for PVC because nobody will bear the costs for such an authorisation. The quantities of post consumer PVC to be buried by landfill or to be	C.1.1. General principles for exemptions under Art. 58(2)

		incinerated would increase dramatically.	<p>C.1.3. Aspects not justifying an exemption from authorisation</p> <p>A.2.22. Reconsider inclusion in Annex XIV because of the impact on the recycling of PVC materials</p>
2606 2014/11/24	Pb REACH Consortium managed by the International Lead Association-Europe, Industry or trade association, United Kingdom	<p>The Pb REACH Consortium would like to point out that all the downstream user sectors will be submitting their comments into this section of the public consultation on exemptions. A joint Pb REACH Consortium exemption argument for battery use compiled by ILA/Pb REACH Consortium will be submitted by Eurobat.</p> <p>2606_ECHA public consultation instructions pentalead tetroxide sulphate 241114.pdf</p>	See responses referred to in comment #2606 in section I.
2627 2014/11/25	EUROBAT, Industry or trade association, Belgium	<p>EUROBAT has attached in section IV a joint response by EUROBAT and the Lead REACH Consortium requesting the exemption of pentalead tetraoxide sulphate from the authorisation requirement for the industrial use of this substance in the manufacture of lead-based batteries.</p> <p>2627_EUROBAT and Lead REACH consortium - Exemption Request document - final 251114.pdf</p>	See responses referred to in comment #2606 in section I.
2723 2014/11/27	Exide Technologies, Company, Germany	<p>Exide Technologies supports the joint EUROBAT and the Pb REACH Consortium document submitted by Eurobat requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons:</p> <ol style="list-style-type: none"> 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead -based batteries would in any case meet the conditions for an exemption under Article 58(2) REACH 	See responses referred to in comments #2606 and #2627 in section I.
2733	WirtschaftsVereinigung	Also in this respect WVM supports the arguments brought forward.	See responses referred to

2014/11/27	Metalle, Industry or trade association, Germany		in comment #2606 in section I.
2784 2014/11/28	WKÖ, Other contributor, Austria	See PDF attached. 2784_su_86_WKÖ Bleiverbindungen.pdf	See responses referred to in comment #2784 in section I.
2822 2014/11/28	Norway, Member State	Norway does not support that any exemptions from the authorisation requirement should be proposed.	Thank you for your comment.
2862 2014/11/28	Individual, Germany	HOPPECKE supports the joint EUROBAT and the Pb REACH Consortium document submitted by EUROBAT requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxid sulphate and tetralead trioxid sulphate in lead based battery production from the authorization for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead based batteries; and 2. The use of these substances in the manufacture of lead based batteries would in any case meet the conditions for an exemption under Article 58(2) REACH	See responses referred to in comments #2606 and #2627 in section I.
2898 2014/11/30	Johnson Controls Autobatterie GmbH & Co. KGaA, Company, Germany	Johnson Controls Autobatterie GmbH & Co. KGaA based in Hannover, Germany, supports the joint EUROBAT and Pb REACH Consortium document submitted by EUROBAT requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead-based batteries would in any case meet conditions for an exemption under Article 58(2) REACH.	See responses referred to in comments #2606 and #2627 in section I.
2903 2014/11/30	Johnson Controls Autobatterie spol. s	Johnson Controls Autobatterie spol. s r.o. based in Česká Lípa, Czech Republic, supports the joint EUROBAT and Pb REACH Consortium document submitted by EUROBAT	See responses referred to in comments #2606 and

	r.o., Company, Czech Republic	requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead-based batteries would in any case meet conditions for an exemption under Article 58(2) REACH.	#2627 in section I.
2909 2014/11/30	Johnson Controls Autobaterías, S.A , Company, Spain	Johnson Controls Autobaterías, S.A based in Madrid, which operates two battery production sites in Burgos and Guardamar del Segura (Alicante), Spain, supports the joint EUROBAT and Pb REACH Consortium document submitted by EUROBAT requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead-based batteries would in any case meet conditions for an exemption under Article 58(2) REACH.	See responses referred to in comments #2606 and #2627 in section I.
2914 2014/11/30	Johnson Controls Sachsen-Batterien GmbH & Co. KG, Company, Germany	Johnson Controls Sachsen-Batterien GmbH & Co. KG based in Zwickau, Germany, supports the joint EUROBAT and Pb REACH Consortium document submitted by EUROBAT requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead-based batteries would in any case meet conditions for an exemption under Article 58(2) REACH.	See responses referred to in comments #2606 and #2627 in section I.
2918 2014/11/30	Johnson Controls Recycling GmbH, Company, Germany	Johnson Controls Recycling GmbH based in Buchholz, Germany, supports the joint EUROBAT and Pb REACH Consortium document submitted by EUROBAT requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons: 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH)	See responses referred to in comments #2606 and #2627 in section I.

		<p>in the manufacture of lead-based batteries; and</p> <p>2. The use of these substances in the manufacture of lead-based batteries would in any case meet conditions for an exemption under Article 58(2) REACH.</p>	
2981 2014/12/01	ACEA, Industry or trade association, Belgium	<p>ACEA has attached in section IV a response requesting the exemption of pentalead tetraoxide sulphate from the authorisation requirement for the industrial use of this substance in the manufacture of lead-based batteries.</p> <p>2981_20141201 ACEA Comments Authorisation Lead compounds.pdf</p>	See responses referred to in comment #2981 in section I.
2983 2014/12/01	Individual, Italy	<p>FIAMM SPA supports the joint EUROBAT and the Pb REACH Consortium document submitted by Eurobat requesting an exemption of the use of lead monoxide, lead tetroxide, pentalead tetraoxide sulphate and tetralead trioxide sulphate in lead-based battery production from the authorization requirements for two reasons:</p> <ol style="list-style-type: none"> 1. These substances are used as intermediates (in the meaning of Article 3(15) REACH) in the manufacture of lead-based batteries; and 2. The use of these substances in the manufacture of lead -based batteries would in any case meet the conditions for an exemption under Article 58(2) REACH 	See responses referred to in comments #2606 and #2627 in section I.
2993 2014/12/01	ELSA (ESPA), Industry or trade association, Belgium	<p>REQUEST FOR EXEMPTION ON THE BASIS OF REACH ART. 58.2 (exposure well controlled by other community legislations)</p> <p>The a.m. substance should not be subject to authorisation because it meets the conditions for an exemption under Article 58(2) REACH. Indeed the exposure to lead and its compounds is already regulated in all the EU by a plethora of various legislations. (For the sake of brevity we refer to the list and a detailed analysis of the effectiveness of those various pieces of legislations contained in the comments submitted by the ILA/EUROBAT concerning the use of lead compounds, including the a.m. substance).</p> <p>In addition we wish to highlight that in 2012 the German BAuA undertook a RMOA for use of all lead stabilisers in PVC production in relation to a potential restriction proposal. This concluded that since there was already a voluntary commitment by the European Plastics Industry (Vinylplus) to phase out use of lead stabilisers by end 2015 then the preferred risk management option would be to wait until this had completed its course and to re-evaluate the situation after 2015.</p> <p>2993_Lead substances proposed for authorisation comments-VinylPlus 20141114.pdf</p>	<p>C.2.1. Requests for Art. 58(2) exemptions.</p> <p>A.2.17. RMOA conducted by one MS concluded that no further regulatory actions is needed (before 2015)</p> <p>A.2.18. Ask ECHA to consider the fact that the use of lead-stabilisers in PVC is currently being phased-out</p>

			See responses referred to in comments #2606 and #2627 in section I.
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