

European Environmental/HSE Regulations for Friction Materials

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Lapinus Fibres B.V.



Regulations



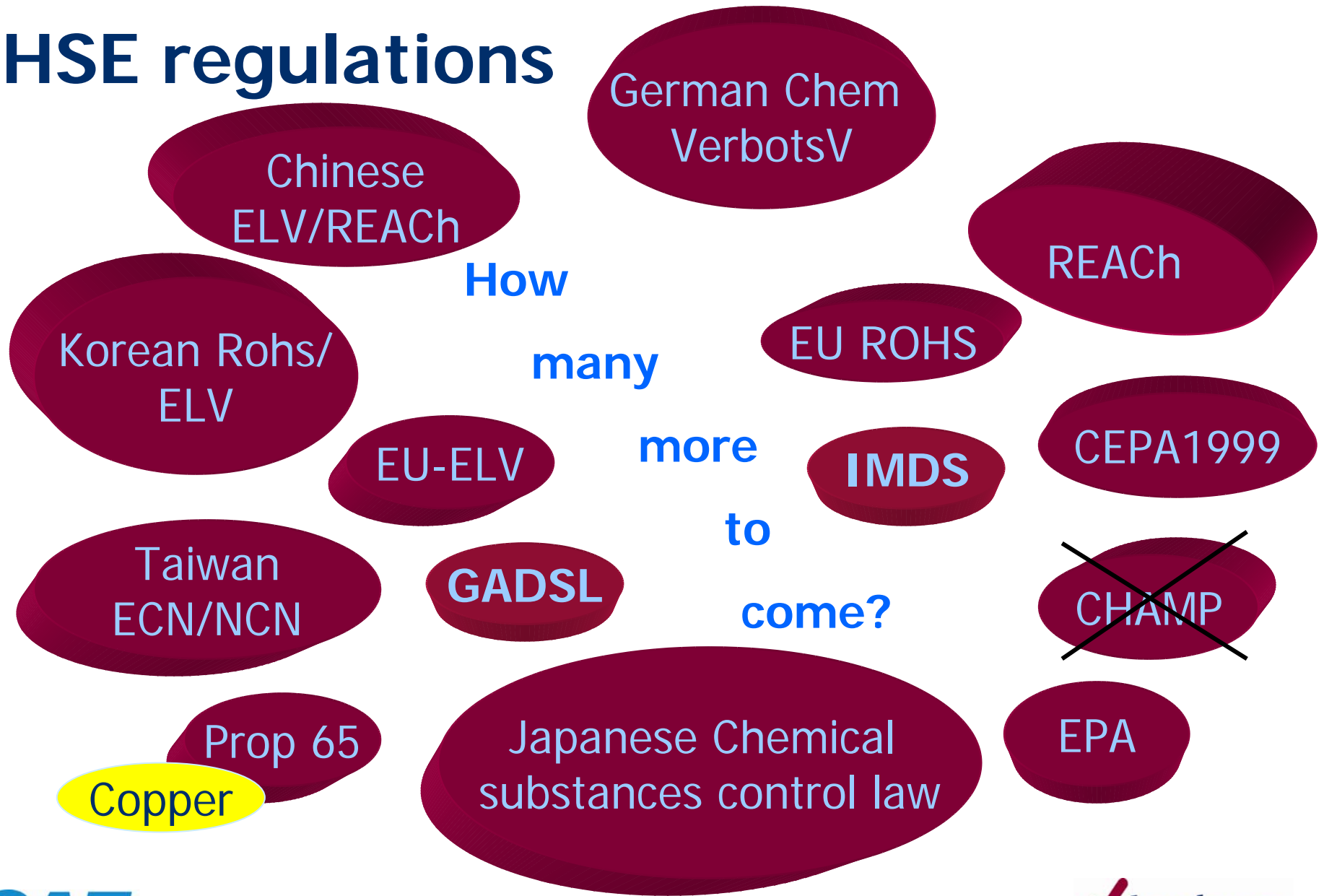
Set by

- National (international) laws
- Institutions (WHO/IARC)
- Companies (e.g. Ford, FM)

(Inter)National laws

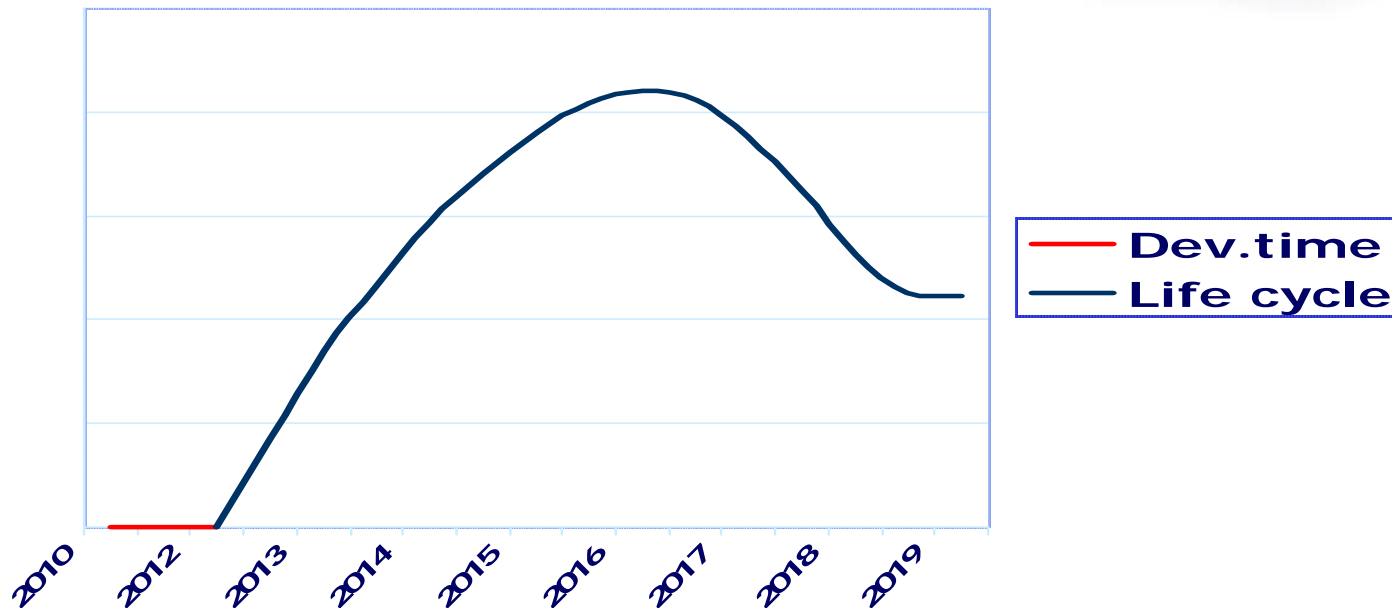
- EU Directives (67/548EEC, ELV, REACH)
- Germany – ChemVerbotsV (chemical ordinance), GefStoffV (dangerous substances), TRGS905
- USA – California Proposition 65
- Canada – CEPA, Canadian Environmental Protection Act
- China – End of Life vehicle
- Etc, etc

HSE regulations



Implications for automotive industry

Many regulations, long development time and the life cycle of friction materials



Implications for automotive industry



ImPLY.....



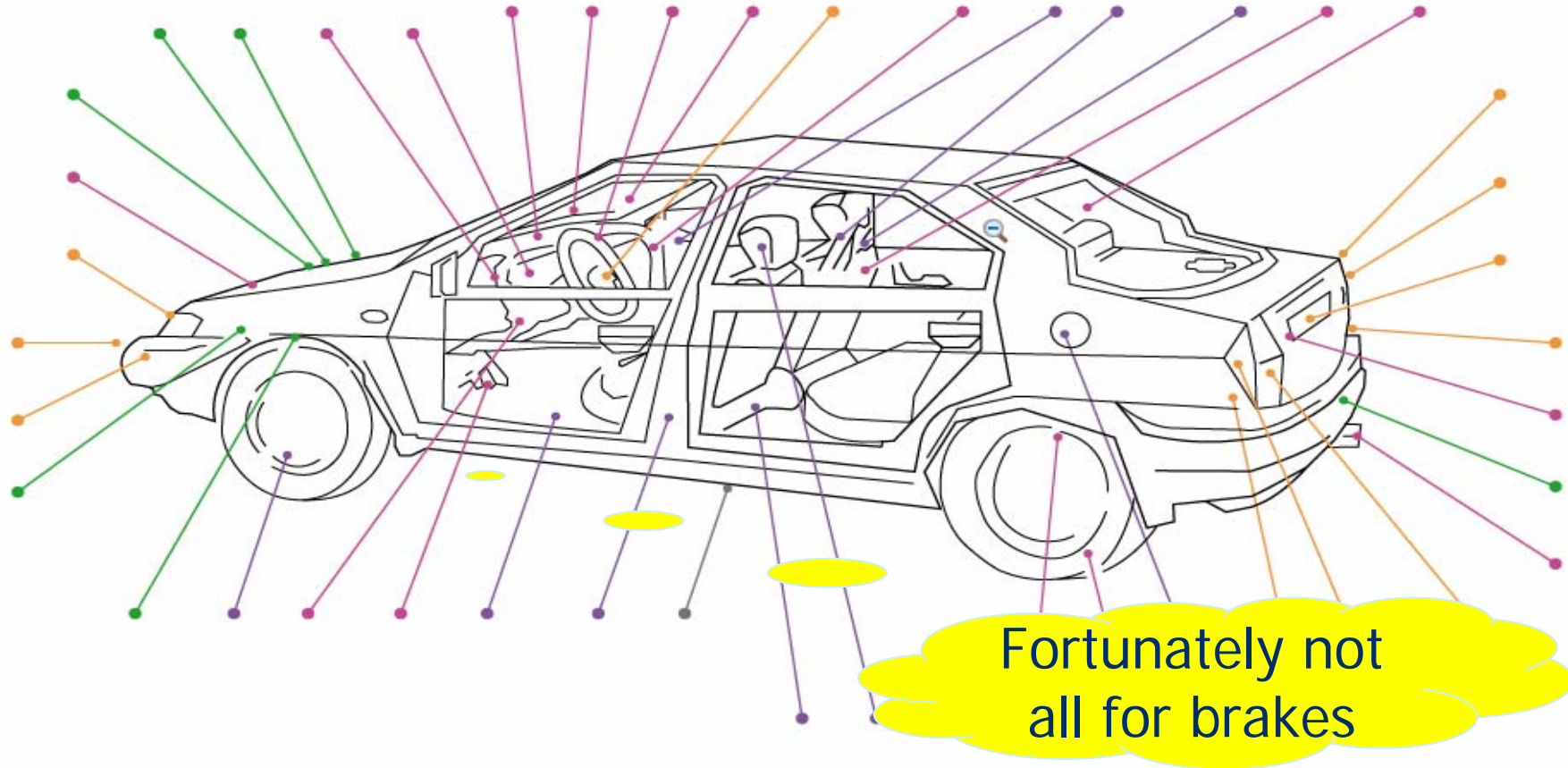
long term anticipation
on possible future
forbidden substances

EU

The EU Situation differs but not much....



45 EU Directives & Regulations



● Environment | ● Lighting & signaling | ● Active safety | ● Passive safety | ● Other

CARS21

Competitive Automotive Regulatory System
For the 21st Century



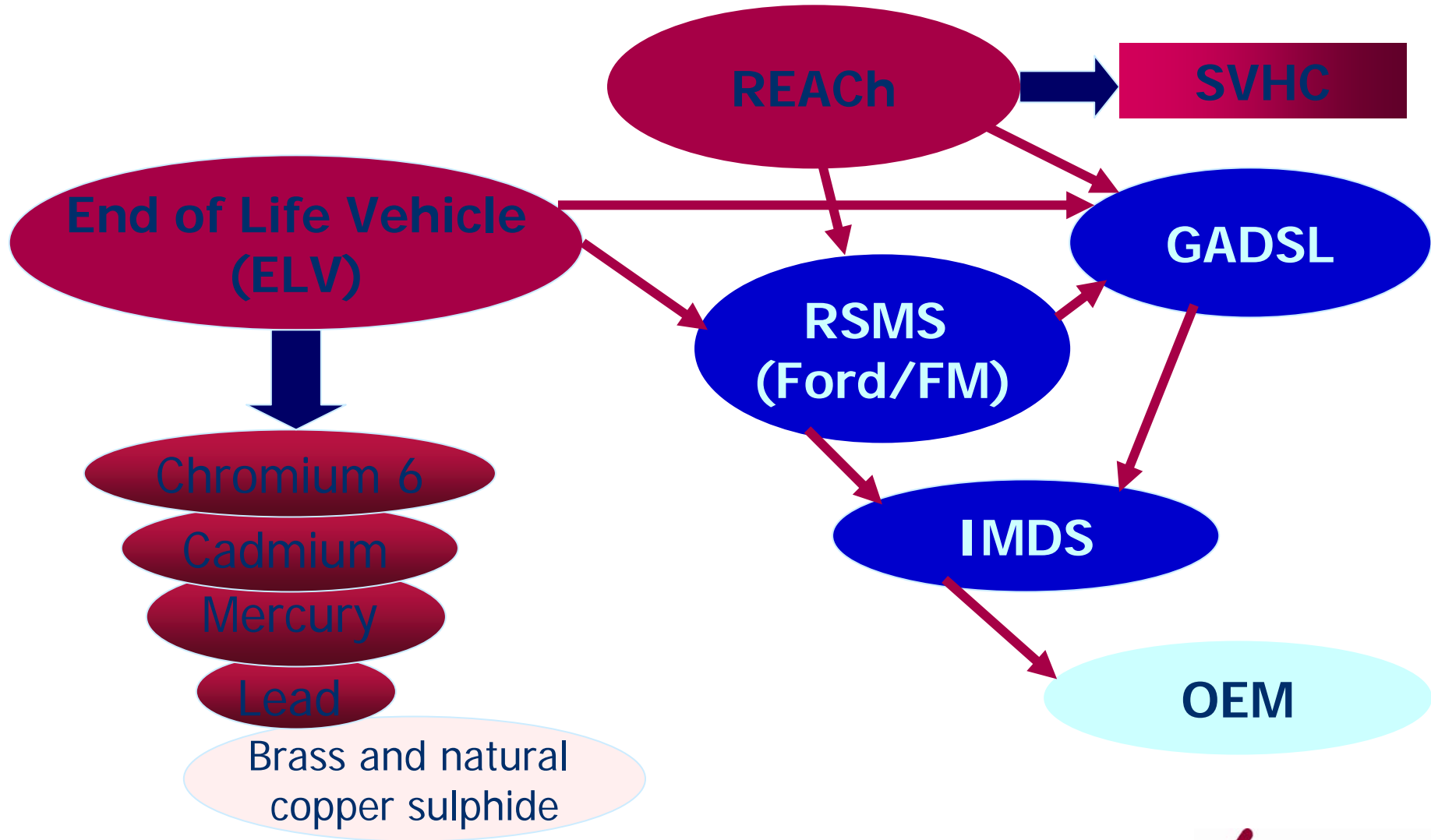
Main stakeholders:

vehicle manufacturers, oil/fuel suppliers,
repairers, customers/drivers, public
authorities.

Goal:

Better legislation, reciprocal trade agreements,
harmonisation legislation, sufficient lead-times (CO₂).

Situation EU concerning friction materials



REACH

- What is REACH
- Why REACH
- Aim / objective
- Requirement
- Complexity
- Scope
- Timeline
- Status
- REACH & the Friction Industry
- Future thread
- Conclusion



REACH

Abbreviation for:

Registration, Evaluation, Authorization of
Chemical substances.



What is REACH

REACH applicable in the 27 EU-countries

Responsibility for the proper risk control of chemical substances moves to trade and industry



Source Sabic-Europe

Producer/importer should list the risks and recommend the measures to control those risks

Why REACH

REACH replaces 40 pieces of legislation
= one regulatory system.



**Principle: chemicals
used in the EU should
not affect human health
or the environment.**

Aim / objective

Higher awareness safe use of chemicals



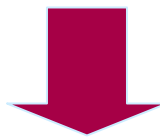
Improve protection of human health and environment

Stimulate innovative capacity of EU industry

Requirement



- Industry to register
- Existing and future new substances
- Produced or imported in the EU
- Volumes above 1 ton/year



ECHA

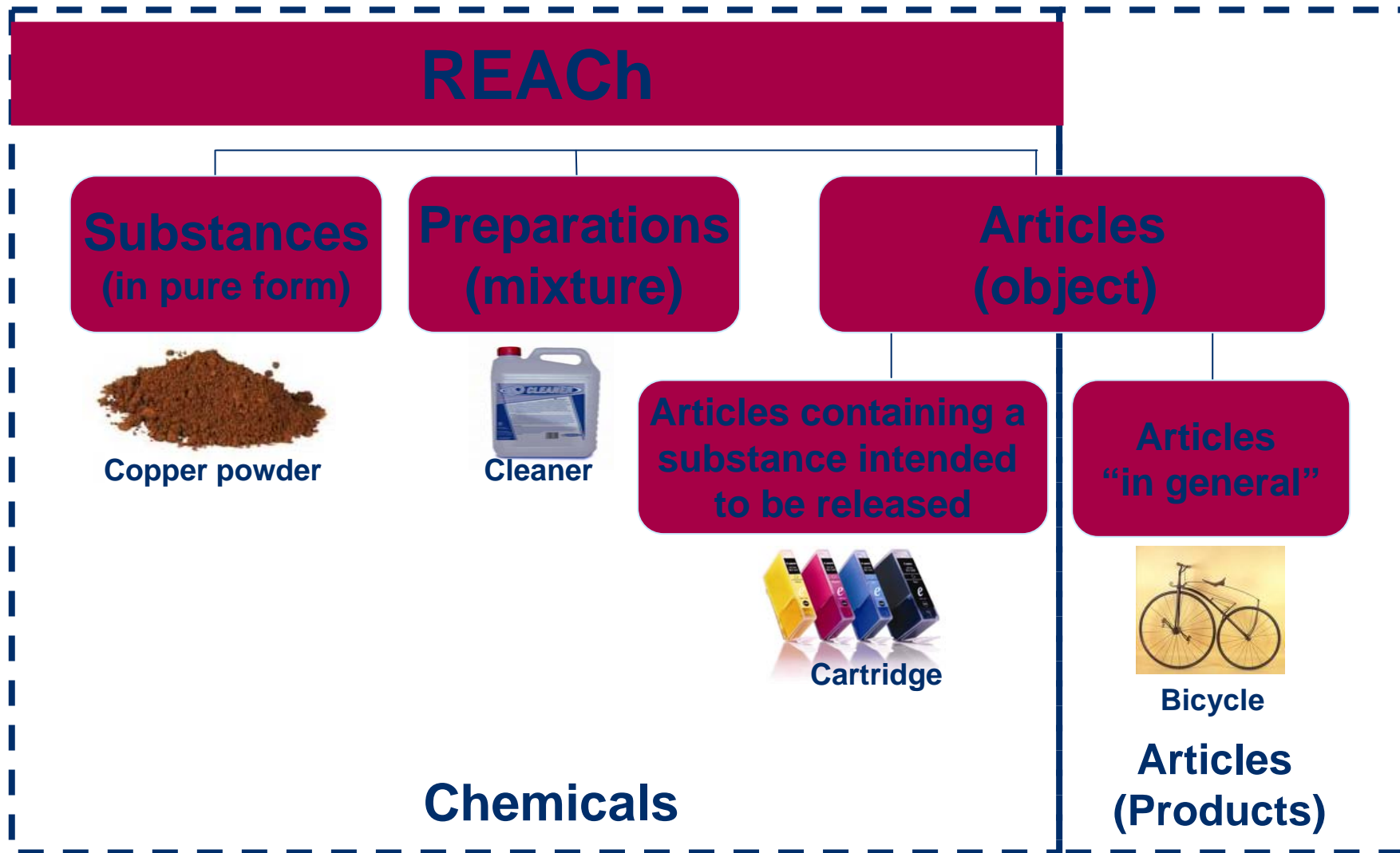
(European CHemicals Agency)

REACH – a complex regulatory framework



- Legislation incl. explanatory memorandum >250 p
- Annexes >600 p
- RIP/guidance documents >10.000 p
- A multitude of internet pages and counting

SCOPE



Timeline



Authorized: Mn Consortium - Harlow

Status

True registration intentions

(registered 143.000 substances by 65.000 companies)

- 25% of all pre-registrations will also be registered
- 7% of all substances due by 1 Dec 2010
- 13% of all substances due by 1 June 2013
- 80% of all substances due by 1 June 2018

REF. CBA - FECC

REACH and the Friction industry



Guideline by trade organisations of Automotive Industry

REACH and the Friction industry



A brake pad/lining is a

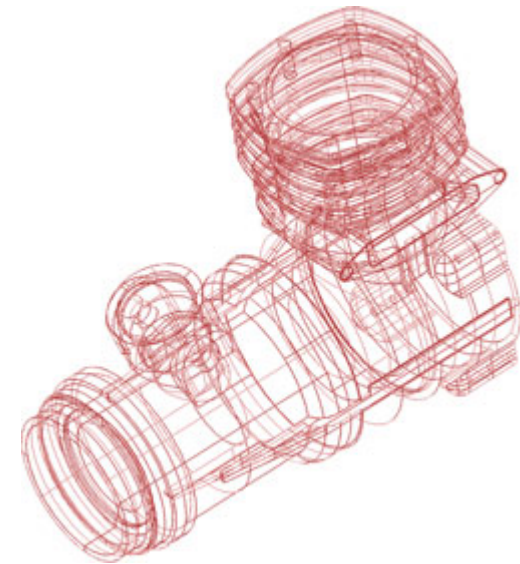
- ➔ Substance
- ➔ Preparation
- ➔ Article (release?)



REACH and the Friction industry

Definition article :

“an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition”
(Article 3.3 REACH).



Example: brake pad or lining.

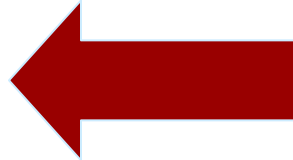
REACH and the Friction industry

A registration (REACH Article 7.1) of substances in articles is obligatory if the substances are **intended to be released** from the produced or imported article(s) during normal and reasonable foreseeable conditions of use.



REACH and the Friction industry

A release is not considered to be an intended release in the following cases:



.....Release of particles or wear debris from tyres or rubber belts, brake linings and discs.



No registration required

BUT....



Future thread

Using >0,1% SVHC
(Substance of Very High
Concern)?

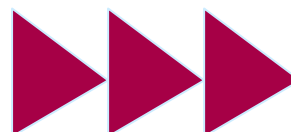


Inform recipient & instruct on safe use

Usage – in EU - >1 tonne per annum



Notify Echa



Restrictions

Future thread

Check regularly for potential SVHC's:



ECHA Candidate list



Now proposed:

Refractory Ceramic Fibre



SIN (Substitute It Now) list



Now mentioning:

Asbestos and Antimony Trioxide

Conclusion

- ❖ Brakes linings & pads => no registration required (AIG)



- ❖ Substances of Very High Concern (SVHC) have to be reported (notified)

- ❖ If no SVHC are used then there is no problem....Check lists (e.g. candidate list, SIN list, Trade Union list) regularly.



Thank you for
your attention

