

EGMF

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- Industry;
- Retail/distribution;
- Rent/repair business;
- Industry/business association;
- RoHS enforcement;
- RoHS analysis;
- Environmental NGO;
- Consumer NGO;
- Institute/consultancy;
- EU Member State Representative;
- International agency / organisation;
- Other - Please specify: _____

3. EEE newly in scope		EGMF ANSWERS																					
Questions/products	ALL PRODUCTS	Augers	Blowers/vacuums	Brush cutters	Chainsaws	Edge Trimmers	Grass Trimmers	Hedge Trimmers	High pressure cleaners	Ice Augers	Lawn and garden tractors (non professional)	Lawnmowers (non professional)	Log splitters	Motor hoes	Pole pruners	Pumps/Submersible pumps	Scarifiers/Turf aerators	Shredders	Snow throwers	Sprayers	Stump grinders	Sweepers	
3.a	Why is product/ application considered newly in scope	Definition of EEE	idem...																				
3.b	Similar products/ applications already in the scope of RoHS 1	none	electric/battery powered	electric/battery powered	electric/battery powered	electric/battery powered	electric/battery powered	electric/battery powered	electric/battery powered	none	electric/battery powered	electric/battery powered	electric powered	electric/battery powered	electric/battery powered	electric powered	electric/battery powered	electric powered	electric powered	battery powered	none	electric/battery powered	
3.c	Product market share: General and in the EU	8.6 million units *																					
3.d	Service life (years)	10 years																					
3.e	Reparability	All equipment is repairable. All parts are spare parts; critical ones regarding regulated substances under RoHS are: e.g. electric parts, fasteners, blades, coated/plated parts...																					
3.f	Secondary market operations	All of these products can be leased, rented or be sold as second hand products																					

* Estimate Europe (geographical) sales volumes for 2012 of petrol-driven machines, within EGMF membership only (Source EGMF)

4. Compliance of EEE newly in scope		EGMF ANSWERS	
4.a	Presence of RoHS regulated substances (% weight & quantity of substance):	Lead	Yes, in solder, metal alloys, ceramics, recycled plastics. Estimation: 0.74 g in solder per product. Investigations are still ongoing and it is unknown precisely how much lead remains in the product.
		Mercury	No
		Cadmium	Yes (in switches/recycled plastics)
		Hexavalent chromium	Yes, on fasteners and other steel parts for corrosion protection. Estimation: up to 200 µg per product
		Polybrominated biphenyls (PBB)	Yes, mainly in plastics, insulation parts, paints, electric parts Investigations are still ongoing and it is unknown precisely if / how much PBB remains in the product.
		Polybrominated diphenyl ethers (PBDE)	Yes, mainly in plastics, insulation parts, paints, electric parts Investigations are still ongoing and it is unknown precisely if / how much PBDE remains in the product.
4.b	Components and parts of relevance		Covered in the above answers

5. Substitution of RoHS substances in EEE newly in scope		EGMF ANSWERS						
5.a	Availability of alternatives for the relevant RoHS regulated substances	<table border="1"> <tr><td>Lead</td></tr> <tr><td>Mercury</td></tr> <tr><td>Cadmium</td></tr> <tr><td>Hexavalent chromium</td></tr> <tr><td>Polybrominated biphenyls (PBB)</td></tr> <tr><td>Polybrominated diphenyl ethers (PBDE)</td></tr> </table>	Lead	Mercury	Cadmium	Hexavalent chromium	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
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		Assuming that current exemptions will remain, alternatives are available. For other non-exempted application, however, applicability needs to be checked for every component.						
5.b	Applicability of possible alternatives	Focus on lead in general/cadmium in switches.						
5.c	Changes to product characteristics resulting from alternative application	<p>The substitution by lead free solder may result in a reduction of the lifespan of the entire product, due to reduction of the lifespan of certain components of the product for which lead free solder has been used (and an increase of the waste generated).</p> <p>Investigations are still ongoing on the possible effects of lead free solder on the lifespan of product/components.</p>						
5.d	Roadmap towards substitution – required steps and time span	<p>Generic timeline: Product development until mass products: 2 to 4 years (extended in case of new legal requirements) + durability/performance testing: 2-3 years + finding alternative substance: 2 years = 6 to 8 years*</p> <p>But there is a need for exemption also for spare parts for those products manufactured before 2019.7.22.</p> <p>* This depends on the wide variety of types and sizes of products covered by EGMF.</p>						

6. Impacts of compliance		EGMF ANSWERS				
General comments		EGMF represents producers and is very concerned with spare parts for products placed on the market before 22.07.2019. Leasing, rental and second-hand markets are responsibilities of different industries that may need the availability of spare parts after 22.07.2019.				
		Option 1	Option 2	Option 3	Option 4	Option 5
		RoHS 2 legal text to remain unchanged	Amendment of Article 2(2) to exclude Category 8 and 9	Incorporation of Article 2(2) into Article 4(3) with the 22.7.2019 as compliance date, thus allowing secondary market operations for non-conform products newly placed on the market before July 2019*;	Incorporation of Article 2(2) into Article 4(3) with an earlier compliance date (to be agreed upon with the EU COM), thus allowing secondary market operations for non-conform products newly placed on the market before the respective date;	The addition of a spare part provision for non-conform products newly coming into scope and placed on the market before 2019*.
6.a Compliance costs	one time costs	--- Insufficient time for compliance will increase costs. It's impossible to develop spare parts for old models. Exact cost is unknown, and is impossible to investigate in detail for all products.	Not concerned	+ Would limit the costs caused by the "hard stop" of distribution/leasing/rental of non-conforming products overnight.	- Insufficient time for compliance will increase costs.	+ No additional costs for research / spare parts adaptation to newly applicable substances restrictions
	annual costs	- Exact cost is unknown, and is impossible to investigate in detail for all products.	Not concerned	+	-	
6.b Benefits/period		--- None	Not concerned	+ Would avoid disturbance in the distribution at once, and maintain the rental, leasing and second-hand markets.	- None	+ Immediate benefit
6.c Health and environment		--- Important scrapping of products and spare parts already on the market.	Not concerned	+ Would limit important scrapping of products and spare parts already on the market.	- Less time for finding alternatives and assessment of performance/environment & health benefits.	+ No scrapping of spare parts / products
6.d Employment	Throughout the supply chain	-- Compliance jobs may increase temporarily at the expense of production jobs.	Not concerned	+ Would allow to maintain jobs / adaptation of skills.	-- Compliance jobs may increase temporarily at the expense of production jobs	- Indirect impact due to engendered costs
6.e Competition (e.g. import/export)		-- Exports will be more expensive in the absence of such requirements outside the EU. Unfair competition among companies in the EU (depending if company produces electric products already or not, and if a company is ready before 22 July 2019 or on 22 July 2019).	Not concerned	+ Would limit the impact on costs for exports. Would limit unfair competition among companies placing products on the EU market.	-	+ Would limit the impact on costs for exports Would limit unfair competition among companies in the EU
6.f Supply of certain products or components		--- Spare parts will not be available anymore after 22 July 2019 (Repair-as-produced principle not applied in this case).	Not concerned	+ If combined with Option 5.	-	+ If combined with Option 3

*supported by EGMF as long as such incorporation is consistent with the principles of the EU Treaty and the New Legislative Framework (NLF).

*supported by EGMF as fully in line with the "repair as produced" principle