

JBCE comment on public consultation of "6(a): Lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead by weight" in 2015 Consultation 2

Name and contact details

1) Name and contact details of applicant:

Organization: Japan Business Council in Europe

Tel.: +32-2-286.53.30

Name: Shinya Sasaki

E-Mail: sasaki@jbce.org, info@jbce.org

Function: Secretariat

Address: Rue de la Loi 82, 1040 Brussels

Dear RoHS exemption evaluation team,

14 October 2015

JBCE would like to highlight you that the exemption 6(a) in annex III can be applied to category 8&9 products for seven years from identified date when entry into force for each products, at the earliest July 2021. Therefore, JBCE understand that the category 8&9 are out of scope of this review.

[About JBCE]

Created in 1999, **the Japan Business Council in Europe (JBCE)** is a leading European organization representing the interests of almost 70 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. Together, our member companies represented in 2013 global sales of 1.4 trillion euros. Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities. www.jbce.org