

Dunkermotoren GmbH - PO box 1240 - DE - 79845 Bonndorf

Dunkermotoren GmbH

Hans-Christian Eberl
European Commission
DG Environment
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Your partner:

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Your ref.:

Your letter dated:

Date:

06.08.2015 / DEB-PM

Application for renewal of the exceptions 6a according to Article 5 by the RoHS Directive 2011/65/EU

Dear Mr. Eberl,

Referring to the RoHS Directive 2011/65/EU, we want to make an application for renewal of the exception 6a set out in Appendix V.

a) Dunkermotoren GmbH
Allmendstraße 11
79848 Bonndorf
Germany

b) Lead as an alloy element in steel (exception 6a in the appendix III).
At Dunkermotoren affected materials:

- 11SMnPb30; material number 1.0718 up to 0.35% lead
- 60SPb20 (SWT60Pb); material number 1.0758 up to 0.35% lead
- 16MnCrS5Pb (ESP65); material number 1.7142 up to 0.30% lead

Lead is used in the steels mentioned above as an additive for a better mechanical processing. These components are used by Dunkermotoren for engine and transmission parts (gear parts).

- c) The manufacturability of these components increases the cost due to the sophisticated handling of our suppliers, as increasing production times and shorten tool life.
- d) The effort for testing and qualifying the drive units, as in Article 5 - paragraph 1 called, is scientifically and technically impractical.
- e) Not applicable.
- f) Markets for electric drives from Dunkermotoren:
- Industrial Automation
 - Basic automation
 - Motive
 - Medical

- Door Automation
 - Sun protection
- g) Clarification alternative materials with equivalent characteristics. Information to all customers about the upcoming material changes with the request to release the use of new materials. Subsequently extensive requalification of the already qualified products to confirm and prove the technical specifications.
For the requalification of each product with various alternative materials and of the compatibility of the individual components (e.g. lubricants) we see a period of 2-5 years.
- h) -
- i) Lead as an alloying element in steel for machining purposes with a mass fraction of more than 0.35% lead for gear parts for another 5 years.
- j) Lengthening of the exception for lead as an alloy element in steel for machining purposes up to 0.35% about at least 5 years to search, to test and to qualify alternative materials.

Bonndorf, 06.08.2015



Uwe Lorenz - Management



Carsten Lang - Hazardous substance manager