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## Contribution to Stakeholder Consultation 2015-2 Request for extension of exemption 6a Lead in steel

Article 5 in the RoHS directive (2011/65/EC) stipulates that exemptions can be included in Annexes III and IV for materials and components of EEE for specific applications. Our interpretation is that both the material or component and the specific applications need to be defined in the description of an exemption. The current exemption 6a, where a specific application is missing, is transmitted from the first version of the RoHS Directive (2002/95/EC). As RoHS 2011/65/EC require a specific application for exemption, it is no longer legally possible to decide on an exemption for lead in steel whatever the use is.

When there are applications for which an extension of the current exemptions 6a is justified we find it necessary to amend to the exemption text, a specification of the relevant applications. The outcome may be that the current exemption for lead in steel will be split into a number of more specific exemptions, related to applications where it has been verified that feasible alternative are not currently available.

Below the descriptions of specific applications of steel containing lead are summarised, which all have been described in the submitted applications for extension of exemption 6a. This information should be used as a basis for wording of new subgroups of the current exemption 6a, rather than keeping the broad and unspecific wording that do not conform with the requirements in the updated RoHS directive 2011/65/EC any longer. There is no information indicating that another concentration limit for lead in those applications should be considered.

### **Applicant: Dunkermotoren GmbH**

*Specific applications for which the extended exemption is requested:*

Electric drives, engines and transmission parts (gear parts).

*Justification of a concentration limit for lead:*

Up to 0.35%.

*Other comments:*

The applicant needs an extension between 2 and 5 years.

**Applicant: Eurofer.**

*Specific applications for which the extended exemption is requested:*

Fasteners and support brackets/fixings in lighting units that require high levels of durability in outdoor or aggressive environment; transformer housings and heat exchangers

Fuel injection systems, hydraulic clips, keys, motor shafts, printer shafts, lap top screen screws.

The articles specified above shall be combined with the following manufacturing conditions: Articles manufactured in batch galvanised processes.

*Justification of a concentration limit for lead:*

No such information

**Applicant: Sensata Technologies**

*Specific applications for which the extended exemption is requested:*

Latching components within the tripping an actuation mechanism

*Justification of a concentration limit for lead:*

No such information