

Oeko-Institut e.V.

Att:Carl-Otto Gensch

P.O. Box 17 71 D - 79017 Freiburg Germany

Dear Sir,

Vellinge 2015-10-16

I Refer to the exemption 6 (c).

I represent the company <http://www.elteco.se/> . We produce low-voltage switchgear and controlgear assemblies.

The numbers below refer to your questionnaire.

1. and 2 a. I propose that the exemption should continue with a maximum content of lead in copper of 4%.

b. The important thing is that Lead (Pb) does not enter into the biological system. Since the demounting of an assembly always is done by skilled personnel it is easier to recycle the products than it would be if it was a consumer's responsibility. Brass with a low melting point is easy to melt down and re use.

c. As a manufacturer of distribution boards DBO: S, an assembly that exists in every household, we use brass terminals for the protective conductors and sometimes for the neutral conductors.

We buy these brass bars from our supplier Mericon.

<http://www.mericon.se/massingskenor-tillbehor/>

I also add a picture of one of our assemblies so you can see how it is fitted inside the assembly. As you are already aware of, an addition of a small amount of lead in brass products, enhances the probability to process the brass in accurate, fast and precise ways in the screwing machines, and together with small amounts of other metal provides corrosion resistance to the brass terminals. When I talked to our supplier, he cannot say that it is at all possible to make these terminals with a much altered composition.

3 We estimate that we use 1500 kg of brass/year. 3,11% lead in the product adds up to 47 kg total.

4 All metals leads electricity, but the alternative that is mostly used aluminium is unpractical in any indoor installation. Silver is even better than copper, but is it an alternative?

5 I see no such alternative at the moment.

6 Maybe the Commission could initiate a research product. As for now I am not aware of any such research. We are a small company depending on other small companies for parts. We are always looking for alternatives that are environmentally sustainable, but I cannot see such alternative right now.

7 No additions

8 We need to know there are realistic alternatives before we abolished the exemption.

Med vänlig hälsning/Kind regards,

Eva Gummesson | Project Manager

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