

To:
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Contribution to Stakeholder Consultation 2015-2 Request for extension of exemption 6c Lead in copper alloys

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 6c, 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 copper alloys whatever the use is.

When there are applications for which an extension of the current exemptions 6c is justified we find it necessary to amend to the exemption text, a specification of the relevant applications and when applicable also lower the concentration limit. The outcome will most probably be that the current exemption for lead in copper alloys 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 materials containing lead are summarised, which all have been described in the submitted applications for extension of exemption 6c. When available concentration limits for lead in those applications are included as well. This information should be used as a basis for wording of new subgroups of the current exemption 6c, 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.

Applicant: Bourns Inc.

Specific applications for which the extended exemption is requested:

Shaft screws and bushings in passive electronic components as Counting Dials, Precision Potentiometers, Encoders, Panel Controls, Radial High Q Inductors, Rotary Sensors, and Trimming Potentiometers.

Justification of a concentration limit for lead:

The applicant refers to free-cutting brass (C36000) which is used as a standard alloy of copper and zinc. In the response to the 1st questionnaire the lead concentration is specified at 3.1%.

Other comments:

The applicant is a manufacturer of components. From the information in the application it is not clear if the articles are used in relevant EEE, and if so if they are sold on the EU market. It needs to be validated if the described components are needed in EEE intended to be set on the EU market. If not, this exemption will not be needed any longer,

Applicant: Dunkermotoren GmbH

Specific applications for which the extended exemption is requested:

Nu such information.

Justification of a concentration limit for lead:

Although this application is written in German, we understand that an exemption for lead concentrations up to 1% in copper-zink alloys would be sufficient if the specific application is defined.

Applicant: Phoenix Contact GmbH&Co KG

Specific applications for which the extended exemption is requested:

Nu such information.

Justification of a concentration limit for lead:

Maximum lead concentration in various materials is discussed, but we do not find it verified that all qualities available at the market are needed for use in EEE just because they are possible to purchase. Thus a lower concentration limit than 4% may be possible to conclude on if a specific application is defined.

Applicant: Framo Morat GmbH&Co KG

Specific applications for which the extended exemption is requested:

Worm gears; may also be expressed as gear motors.

Justification of a concentration limit for lead:

Unclear.

Applicant: Lighting Europe

Specific applications for which the extended exemption is requested:

Contact-pins of fluorescent lamps, starters, GU10 lamps and HID R-mini lamps

Justification of a concentration limit for lead:

The concentration limit of 4% is not clearly verified. Thus a lower concentration limit than 4% may be possible to conclude on.

Applicant: Sensata Technologies

Specific applications for which the extended exemption is requested:

Connectors, Bushings, Terminals, Screws, Hex nuts, Washers, Rivets in sensors intended for use in Thermal Motor Protectors, Thermal Circuit Breakers. Hydraulic Magnetic Circuit Breakers in applications for household and industrial use.

Justification of a concentration limit for lead:

The concentration limit of 4% is not clearly verified. Thus a lower concentration limit than 4% may be possible to conclude on.

Other comments:

Automotive uses are not relevant for the RoHS directive, but would be included in the ELV directive when relevant.