

Von: Claire Snow [cs@icer.org.uk]
Gesendet: Dienstag, 1. April 2008 11:30
An: rohs.exemptions@oeko.de
Betreff: Representation on Exemption 6

Dear Sir

The UK's Industry Council for Electronic Equipment Recycling (ICER) is an association of member companies dealing with the recycling or treatment of waste from all electrical and electronic equipment. ICER members include equipment producers, retailers, waste management companies, WEEE treatment facilities (recyclers) and producer compliance schemes.

We note that 1st April 2008 is the deadline for submissions to Oko Institute in respect of its review of the Annex to the RoHS Directive. Whilst we are not yet in a position to make a detailed submission, we would like to make representations in support of a retention of Exemption 6, covering 'lead as an alloying element in steel containing up to 0.35% lead by weight, aluminium containing up to 0.4% lead by weight and as a copper alloy containing up to 4% lead by weight'. In particular, certain companies that we represent, providing components to the electrical and electronic goods sector, rely on leaded steels (with lead less than 0.35% by weight) in their production processes. Such steels have a proven track record in providing the levels of machinability required for various electrical components and substitutes are not readily available.

We would be grateful for an opportunity to make further representations as this consultation exercise proceeds.

Yours sincerely

Claire Snow

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Director
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