
Von: Grealy, Kerrill (GB - PLC) <Kerrill.Grealy@meggitt.com>
Gesendet: Dienstag, 11. Februar 2020 10:51
An: RoHS exemptions
Cc: Breumlund, Karen (DK - Energy & Equipment); Kristensen, Annett (DK - Energy & Equipment)
Betreff: ATO - diantimony trioxide consultation

Dear Yifaat,

I was hoping to make a comment on the public consultation for diantimony trioxide given the deadline extension to 13th Feb 2020 however I note that on p.17 of 63 of the ATO dossier (full link below)...

2. USE IN ELECTRICAL AND ELECTRONIC EQUIPMENT

The terms of references define the scope of the assessment on the application of diantimony trioxide to the use as **flame retardant**. Thus, a number of applications mentioned by stakeholders during the 1st stakeholder consultation²³ are out of scope of the assessment and will not be considered here.

https://rohs.exemptions.oeko.info/fileadmin/user_upload/RoHS_Pack_15/4th_Consultation/Diantimony_trioxide_RoHS_Dossier_V2_final_20191204.pdf

We have a use of ATO as a dopant in PZT manufacture for the purposes of piezoelectronic components (further details below). As this is not a flame retardant use, could you please confirm that we need not make a comment to the consultation as our use is out of scope?

Also, if we do need to comment, I cannot see how to make such a comment – I kept reaching this link but it was not so straightforward as to how to submit a comment detailing our specific use application.

<https://rohs.exemptions.oeko.info/index.php?id=332>

We use ATO as a dopant in several different types of PZT (piezoceramics). Doping level varies, however it has an important effect on the piezoelectric material properties.

Piezoceramics are used in a wide variety of applications, including transducers for medical ultrasound, vibration sensors for the automotive and aerospace industry, underwater acoustics and flowmeters.

At present there are no validated alternatives giving the same functional properties to the piezoceramic material.

Thank-you in advance,
Kind regards

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