

## 1st Questionnaire Exemption Request 2018-2

### *Exemption for „Lead and hexavalent chromium compounds in electric and electronic initiators of ex-plosives for civil (professional) use“*

#### Abbreviations and Definitions

AUSTIN      AUSTIN DETONATOR s.r.o.

#### Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract<sup>1</sup> for the evaluation of applications for the renewal of exemptions currently listed in Annexes III and IV of the RoHS Directive 2011/65/EU (RoHS 2) by the European Commission.

AUSTIN DETONATOR s.r.o. (below “AUSTIN”) has submitted a request for a new exemption, which has been subject to a first evaluation. The information AUSTIN has referred has been reviewed and as a result we have identified that there is some information missing. Against this background the questions below are intended to clarify some aspects concerning the request at hand.

#### Questions

1. Are there other manufacturers of electric and electronic initiators of explosives for civil (professional) use in or outside the EU which are affected by this request for exemption? Please provide if possible contact details.

AUSTIN DETONATOR s.r.o. fulfils the obligation of the REACH Regulation. We are the main registrant for production of primary lead explosives for detonators. The following companies which are also European detonator producers are SIEF members for the primary lead explosives:

Maxam UEB, S.L.; Spain

Nitroerg SA; Poland

Davey Bickford; France

In addition to AUSTIN DETONATOR s.r.o., there are also other importers and distributors of detonators delivering to the EU market (the specific companies are not known to us).

Regarding to the Article 2 (4) (a) of the RoHS Directive 2, there may exist companies which are of a dual nature production-wise and can benefit from this exemption for the whole production, which can have a significant impact on competitiveness. AUSTIN DETONATOR s.r.o. produces detonators for civilian use only.

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<sup>1</sup> The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

2. In section 6.1.2 of your request some negative impacts on the health of R&D workers and laboratory workers during development activities are reported. Could you please elaborate more in detail which substances under which conditions of treatment have been used?

In past, there were several cases of adverse influencing of the tested alternatives to occupational health. For example, substance Diazodinitrophenol (DDNP) which is substance considered to be "REACH friendly" was tested as possible explosive alternative and causes non-specific health outcomes, e.g. headaches, abdominal pain or nausea. These effects were observed at workers during development activities including manufacture of this substance and contributing activities.

Besides these health outcomes, it is important to mention, that there is high concern of work accident due to testing of new alternatives. The concern arises from knowledge of physical-chemical behaviour of substance which is used during development activities in large scale. Nowadays, number of technical improvements have been developed for ensure safety testing, but each new alternative still brings a certain risk of work accident.

3. When did you start testing possible substitutes in primary explosives and primary explosive as well as in pyrotechnic charges?

AUSTIN DETONATOR s.r.o. has been working on alternatives since 1995 in cooperation with leading Czech and foreign universities specializing in explosive technologies as well as with AUSTIN Group research centers around the world. During this period, a number of replacements were tested. Their results are the subject of a number of studies, publications, diploma theses.

The practical application of alternatives must in particular guarantee the fact that the production of detonators is safe, the working conditions are adequate and the risk of health damage and life-threatening production is at most eliminated. The risk is extremely high compared to the production of other electrical equipment comes under the product group no.11 as well as to other product groups.

4. In section 6.2.2, page 29, table 10 (which is referred to in the text) is missing. Please provide the respective information.

The document contained a formal error in table numbering. Table 10 in text on page 29 corresponds to the Table 9. The document in the annex is formally correct. There has been no change in the text of the document itself.

**Please note that answers to these questions are to be published as part of the available information relevant for the stakeholder consultation to be carried out as part of the evaluation of this request. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.**