

Von: Cecile Tobie
An: [RoHS exemptions](#)
Betreff: RE: Davey Bickford answer to you request
Datum: Donnerstag, 19. Dezember 2018 15:10:08

Our position is :

Davey Bickford position regarding the application of Directive ROHS 2011/65/EU to electric and electronic detonators:

Insofar as are being used, by their very nature, in a single usage, and are completely destroyed upon such usage, the electric or electronic detonators or initiators should not, and were not considered to fall within the definition and meaning of "equipment" (namely the electrical and electronic equipment) as per Directive ROHS 2011/65/EU, and accordingly there should have no basis to submit any exemption, under Directive ROHS 2011/65/EU, for the use of certain hazardous compounds in such electric and electronic detonators or initiators, that would be otherwise restricted by Directive ROHS 2011/65/EU in electrical and electronic equipment (EEE).

Nonetheless, Davey Bickford fully acknowledges the regulation and restrictions that apply pursuant to Regulation (EC) No 1907/2006 (REACH), and considers that any exemption for the use of certain hazardous compounds in detonators or initiators should be submitted, to the extent required, in accordance with Regulation (EC) No 1907/2006 (REACH). In this context, Davey Bickford is very keen at outlining all its research and development efforts towards identifying replacement to those certain hazardous compounds, notably the Pb.

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