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Exemption 6(a)/6(a)-I for lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead by weight

Dear Mrs. Baron,

We appreciate the opportunity to participate in the stakeholder consultation on exemption request evaluation under Directive 2011/65/EU within the framework of the Study to assess RoHS exemptions under Directive 2011/65/EU. Öko-Institut's role in this process is very important, because of the collection and evaluation of the information provided by stakeholders with the goal to provide the EU Commission with a recommendation on an exemption's justification.

We confirm the arguments mentioned in the exemption request for the existing

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which "The Umbrella Project" submitted in the name of many organisations. We fully support this exemption request. All important technical arguments can be found in the exemption request and in the answers to the respective clarification questions.

Best regards
Swiss Steel AG



Carlo Mischler
CEO



Dr. Heiko Haupt-Peter
Leiter Unternehmensentwicklung