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RoHS exemptions evaluation

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Exemption Review under Directive 2011/65/EU

Dear Ladies and Gentlemen,

according your request, Röhm give you the requested feedback. To be in line according your questionnaire, we summarize our answers in your questionnaire structure.

In any case of question, please contact us again.

Questions to Röhm GmbH:

Nr. 4

It is explained that the drill chuck is used in power tools. Please clarify whether such power tools are expected to all fall under EEE Category 6 (electrical and electronic tools) or whether they are applied also in e.g. Category 8 (medical devices). Please note in this respect the definition under Article 3(21) and 3(22) of the Directive for medical devices:

(21) 'medical device' means a medical device within the meaning of point (a) of Article 1(2) of Directive 93/42/EEC and which is also EEE;

(22) 'in vitro diagnostic medical device' means an in vitro diagnostic medical device within the meaning of point (b) of Article 1(2) of Directive 98/79/EC;

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RÖHM answer:

The market for the Röhm product "drill chuck" is the EEE Category 6 (electrical and electronic tools). For sure, drill chucks are also delivered to products which are not in the scope of RoHs now.

The delivered drill chucks which are delivered into the EEE Category 8 (medical devices) are very specific project drill chucks, with a complete different price level, where the material contains no lead and we don't need the exemption 6a.

Nr. 5

How long do you request the exemption to be applicable? The maximum duration an exemption can be granted for is 7 years for Cat. 8 and Cat. 9 EEE and 5 years for all other categories

RÖHM answer:

Röhm request 5 years for category 6 (electrical and electronic devices)

Nr. 6

From your input it is assumed that only the drill chuck body (as being one part of the complete drill chuck) will contain the type of steel where Pb is added for machinability reasons. Please elaborate, also in relation to the relevant type of steel (see question 7).

RÖHM answer:

No additional comment, see question 7

Nr. 7

Question 4(A)5 of the application form asks in your case specifically for the amount of lead placed on the EU market through drill chucks sold by your companies (and/or your competitors). Please provide an estimation based on the amount of drill chucks you place on the market, the average amount of steel content per drill chuck and the average amount of lead content in the steel. Please as minimum provide an estimation for your own EU sales.

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RÖHM answer:

The drill chucks we produce in Germany are mostly for the export to the power tool assembly plants (Asia > 50%, Mexiko ~ 25%, Romania ~ 15%, Rest ~ 10%). The markets worldwide and the specific quantities where our drill chucks have their finally disposition we really not exactly know.

According our calculation lead per drill cuck:

In 2020 in all drill chucks we sold world wide we have ~ 1230 kg lead.

A statement to our competitors is from our point of view not possible. Röhm is the last drill chuck producer for EEE Category 6 (electrical and electronic tools) in Europe for this market. All our competitors produce now in China.

Nr. 8

You state that there is only one supplier providing the type of lead-free steel which could be used as a substitute in drill chucks and that there will be market bottlenecks in availability. Please provide further (quantitative) information to substantiate this statement

RÖHM answer:

Up to now this steel (11SMN30 – EM +C) is from our supplier together with one steel mill supplier specific developed steel. This steel grade is a specific developed basic steel grade. Up to now we could only purchase this from one source. So the availability of this steel in the needed basic steel grade is only given from one supplier. If this supplier decide to stop the production or delivery problems occur, we get in heavy trouble and could not produce the needed volume if we switch to this source. Also for the supplier this is an exotic material and up to now he will not communicate to us, which additional substances instead of lead this material included.

This situation with possible price increase from only one source and also the not given availableness in the market from different sources is a very high risk for the serial production and delivery of the last drill chuck producer in Europe for EEE category 6 (electrical and electronic devices)

To both applicants:

Nr. 9

The environmental impacts of leaded and non-leaded steel focus on low carbon free cutting steels, however, in the description of materials, components and applications, no more concrete definition on the type of steel (whether low carbon free cutting steel or any

other) is addressed. Please refer to the kind of steel (free-cutting steel, steel for hardening and tempering, case hardening steel, other…) for which lead is necessary for machining purposes.

RÖHM answer:

According our understanding to this topic the main impact is when we could/must switch to the lead free steel:

- *According our try outs in 2019 and 2020 we know, that according the needs for the new tooling is to have more rpm. That means we need more energy for the processes and also that perhaps because of this higher load for the machines the lifetime of the machines will be shortened.*
  - ⇨ *From our expectations we think today that when we must change the carbon foodprint of this production would be higher.*
- *Up to now, a clear and final conclusion with all machining processes involved in this material change could not be done. The complete impact of lifetime of the new tooling, the consequences of the different chip building thread chips instead of comma chips, changed process parameters (rpm,..), more load to the existing machines, could not finally done. From our point of view more try outs must be done when the source of material which is comparable to the actual material in the market is given with more then one supplier.*

Nr. 10

If you think there is anything else that is relevant in addition to the questions above, please summarise it under this point.

RÖHM answer:

No additional comment.

Kind regards
Head of Quality-Management

i.V. Christian Weghake