

## RoHS Exemption 6b Response to Oeko-Institute online public consultation

### Name and contact details

Name and contact details of responsible person for this application & response:

Company: European Aluminium Association (AISBL)

Name: Magdalena Garczynska

EU Transparency Register No: 9224280267-20

Function: Recycling Director

Tel.: +32 2 775 63 58

E-Mail: [garczynska@european-aluminium.eu](mailto:garczynska@european-aluminium.eu)

Address: Avenue de Broqueville, 12

BE 1150 Brussels - Belgium



This response to the online public consultation published on the website of Oeko-Institute is submitted on behalf of European Aluminium and the participating industry associations and companies listed below.



**DIGITALEUROPE**

**EU TR No: 64270747023-20**



**European Committee of Domestic  
Equipment Manufacturers (CECED)**

**EU TR No: 04201463642-88**



**European Garden Machinery Industry  
Federation (EGMF)**

**EU TR No: 82669082072-33**

# / RoHS Exemption 6b Response to Oeko-Institute online public consultation



**The Aluminum Association**



**European Passive Components Industry Association (EPCIA)**

**EU TR No: 22092908193-23**



**European Semiconductor Industry Association (ESIA)**

**EU TR No: 22092908193-23**



**Gesamtverband der Aluminiumindustrie e.V.**



**LightingEurope**

**EU TR No: 29789243712-03**



**Wirtschaftsvereinigung Metalle (WVM)**

**EU TR No: 9002547940-17**



**ZVEI - Zentralverband Elektrotechnik- und Elektronikindustrie e.V.**

**EU TR No: 94770746469-09**

Note: 'EU TR No' is the EU Transparency Register

## Questions and answers

## / RoHS Exemption 6b Response to Oeko-Institute online public consultation

European Aluminium, together with members of the endorsing industry associations and other stakeholder companies, reviewed the consultation questions and believe that questions 1-5 and 7 have been answered within the renewal application dossier and the answers to the clarification questionnaires submitted in January and August 2015 respectively. Question 6 has also been partially answered in the two mentioned documents. However, European Aluminium and the endorsing association and companies would like to add the following information to Question 6.

### Additional information to Question 6:

#### On point 6a,

As already stated, lead can be added to the alloys to perform a certain function and lead can be present in the alloys when alloys are produced e.g. from scrap. The former is termed as intentionally leaded alloys and the later, unintentionally leaded alloys. However, there is no straight forward link between intentional/unintentional and wrought/casting, i.e. while casting alloys are mostly produced from scrap, for the production of wrought alloys scrap can also be used as input. Therefore a distinction of intentional and unintentional cannot be made according to the type of alloys.

The exemption 6b has been applied to Al alloys in general which has left the demand and market to determine the most effective utilisation of Al material available to EU producers. An arbitrary distinction of product by the purpose or none purpose of lead could affect the supply and demand chain. The consequences of these changes are yet to be studied from technical, environmental and economical points of view. The industry will need time to comprehend such studies and changes.

Therefore, we propose the exemption wording stays as it is for the current exemption review.

#### On point 6c, we propose to add one more function of lead:

- Better heat treatment performance of the manufactured material