

To:
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Contribution to Stakeholder Consultation 2015-2 Request for extension of exemption 6b Lead in aluminium alloys

Article 5 in the RoHS directive (2011/65/EC) stipulates that exemptions can be included in Annexes III and IV for materials and components of EEE for specific applications. Our interpretation is that both the material or component and the specific applications need to be defined in the description of an exemption. The current exemption 6b, where a specific application is missing, is transmitted from the first version of the RoHS Directive (2002/95/EC). As RoHS 2011/65/EC require a specific application for exemption, it is no longer legally possible to decide on an exemption for lead in aluminium alloys whatever the use is.

When there are applications for which an extension of the current exemptions 6b is justified we find it necessary to amend to the exemption text, a specification of the relevant applications. The outcome may be that the current exemption for lead in aluminium alloys will be split into a number of more specific exemptions, related to applications where it has been verified that feasible alternative are not currently available.

Below the descriptions of specific applications of aluminium alloys containing lead are summarised, which all have been described in the submitted applications for extension of exemption 6b. This information should be used as a basis for wording of new subgroups of the current exemption 6b, rather than keeping the broad and unspecific wording that do not conform with the requirements in the updated RoHS directive 2011/65/EC any longer. There is no information indicating that another concentration limit for lead in those applications should be considered.

Applicant: European Aluminium Association (AISBL)

Specific applications for which the extended exemption is requested:

Screws, bolts, fittings, nuts, automatic lathe products.

Frameworks of lamps and lights, heat sinks.

Electrical and electronic items in housing and industries, automatic dispensers etc. The list is not exhaustive. In practice the use is widespread across numerous products.

As article 5 in the RoHS directive stipulates that exemptions shall be included in Annex III for specific applications, the criteria for decision on a prolongation of the exemption are not fulfilled for an open scope reference to a non-exhaustive list.

Justification of a concentration limit for lead:

Nu such information.

Other comments:

The applicant asks for extension of the existing exemption without specific expiring date. This is not in line with the RoHS directive where the maximum length of an exemption for categories 1-7 and 10 is 5 years.

Alternatives to aluminium alloys has not been included in the analyses of alternatives. Since the variety of articles is so wide it cannot be excluded that other materials, e.g. various polymers or other metals can substitute aluminium in some applications.

Applicant: Sensata Technologies

The applicant is not using this exemption and will thus not need any extended time limit.

Applicant: Dunkermotoren GmbH

Specific applications for which the extended exemption is requested:

Electric drives, engines and transmission parts (gear parts).

Justification of a concentration limit for lead:

Nu such information.

Other comments:

The applicant needs an extension between 2 and 5 years.