

Von: [Woelfl Kurt](#)  
An: [RoHS exemptions](#)  
Cc: [Staperfeld Georg](#); [Gillinger Bettina](#)  
Betreff: Stakeholder Consultation on RoHS Exemption 6c  
Datum: Donnerstag, 8. Oktober 2015 14:03:40

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Dear Sir or Madam,

[ODU](#) is a leading international manufacturer of connection systems.

Hereby we want to confirm our support of the application for extension of the existing exemption 6c (Directive 2011/65/EU (RoHS2)).

As a member of ZVEI, ODU unconditionally confirms the arguments mentioned in the request that PHOENIX Contact GmbH&Co. KG and HARTING KGaA (<http://rohs.exemptions.oeko.info/index.php?id=243>) submitted in the name of the ZVEI and many other organisations involved in the connector field for an extension of the existing exemption 6c (Directive 2011/65/EU (RoHS2) for another 5 years.

In copper alloys lead is used as chip breaker and internal lubricant which cannot be substituted by materials applied from outside.

Lead improves resistance of corrosion and prevents cracks from occurring during the crimping process, which is the most widely-used and stable method to connect a cable and contact pin electrically.

In our company all relevant industrial skills and technologies which are necessary for the design, development and manufacturing of special connection systems are brought together, for instance: design, development and production of special machines, toolmaking, injection moulding, stamping, turning or surface technology and electroplating. This very high depth of production in combination with research, development and design enables us to very accurately predict the far-reaching consequences that the abolition of exemption 6c (copper alloy containing up to 4 % lead by weight) would bring.

95 % of our products would be affected directly. This is very threatening because, despite a broad range of serious efforts in direct cooperation with our raw material suppliers, until now, no material could be found that would even rudimentarily be suitable and bearable as a substitute. Of course, we are continuing our efforts in this area, but desperately need the additional time the extension would bring.

We trust that you will take this seriously into account during your deliberations on this issue.

Yours faithfully,

**Dr.-Ing. Kurt Woelfl**

Geschäftsführung

Managing Director



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