



RoHS exemptions evaluation  
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## Stakeholder consultation on an exemption request from the substance restrictions in electrical and electronic equipment (RoHS Directive) -2015 Consultation 2

### *Exemption 7(a)*

*"Lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead)*

Comments from the Ministry of Environment in Finland and Finnish Safety and Chemicals Agency (Tukes)

The exemption 7(a) is a material specific exemption and it covers large range of electrical and electronic products. Exemption 7(a) is used in various products for which there are lead-free applications available.

We believe that the wording of exemption 7(a) is too wide and can be interpreted to cover all product categories. This may create problems for the enforcement of the RoHS directive in member states. In some applications there are already lead-free alternatives available so the wide use of exemption 7(a) is not consistent with aims of the RoHS directive. From our point of view the exemption should be granted only for those applications and technologies where it is deemed necessary and where no lead-free alternatives are available.

If the exemption is needed in some applications or technologies and more precise wording is not feasible at this stage we would prefer to have an end date for the exemption as required in article 5.2 of the RoHS directive.

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