

Yifaat Baron

Von: [REDACTED]@stihl.de
Gesendet: Freitag, 26. Oktober 2012 15:40
An: Yifaat Baron
Betreff: RE: RoHS: First clarification questions concerning your request for exemption

Dear Ms. Baron,

[REDACTED]

Concerning your questions:

- 1) 2002/88/EC regulates emissions and type-approval procedure for non-road mobile machinery. Classes SH:1, SH:2 and SH:3 are all hand-held products with spark-ignition engines. The division in the classes SH:1, SH:2 and SH:3 is done by the displacement of the engine.

Classes in 2002/88/EC:

1. DIVIDING INTO CLASSES

For the purpose of this Directive, spark-ignition engines shall be divided into the following classes.

Main class S: small engines with a net power ≤ 19 kW

The main class S shall be divided into two categories:

H: engines for hand-held machinery

N: engines for non-hand-held machinery

Class/category	Displacement (cubic cm)
Hand-held engines Class SH:1	< 20
Class SH:2	≥ 20 < 50
Class SH:3	≥ 50
Non-hand-held engines Class SN:1	< 66
Class SN:2	≥ 66 < 100
Class SN:3	≥ 100 < 225
Class SN:4	≥ 225

Typical product examples for the classes:

SH 1: very small hedge trimmers

SH 2: small chain saws, hedge trimmers, lawn trimmers, blowers

SH 3: large chain saws, brush cutters, cut-quicks, backpack blowers

- 2) I categorize all of the products as category 11. An alternative point of view would be to see them as new in category 6 through the changed scope of the RoHS directive. In any case the products would have to fulfill the substance restrictions from July 2019.
- 3) There are two main reasons for an early need for an exemption:

- a) Directive 2011/65/EU applies to “making available on the market” from July 2019. That means the complete supply chain would have to be free of products with lead-containing solder. Since this definition would include also rental business. Products used in this business would have to be replaced well before 2019, in order to serve their normal life time in rental business. This means that the products would have to comply with RoHS at least 3 years before July 2019.
- b) The time needed for research, production of prototypes, testing, optimization of durability with new solder material and changeover for all products to the alternative. Even if we did accept a shorter life-time for the ignition module and start to change directly to the best alternative we know today, we may only be able to change the production until July 2019. We would still have the old products in the supply chain.

In order to research proper alternatives that fulfill the customer expectations for product durability and prevent the unnecessary waste produced through premature product failure, at least one exemption period is needed.

For the investments needed in R&D and production, we need the legal certainty of the exemption. Without the exemption, we would need an immediate emergency plan to keep being able to deliver our products after July 2019. With the exemption we will most likely be able to manage a proper changeover until 2025.

Confidential information:

Please feel free to publish these answers and the original exemption request on the website for the stakeholder consultation.

For the power point presentation, that I did include in the original request, I need to get an official release from my company to allow publication.

Please let me know, it is necessary or would be helpful to publish also the power points. In this case I would try to get the release as soon as possible.

Kind regards
Christina Wedel

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