

Consultation Questionnaire Exemption Request No. 2017-2

Exemption for „Use of lead in welds for gas detectors until July 2018“

Abbreviations and Definitions

Pb	lead
Sn	tin

Background

The Oeko-Institut and Fraunhofer IZM have been appointed by the European Commission, within a framework contract¹, for the evaluation of applications for exemption from Directive 2011/65/EU (RoHS 2), to be listed in Annexes III and IV of the Directive.¹

Oldham SAS has submitted a request for the above mentioned exemption, which has been subject to a first completeness and plausibility check. The applicant has been requested to answer additional questions and to provide additional information, available on the request webpage of the stakeholder consultation (<http://rohs.exemptions.oeko.info/index.php?id=277>).

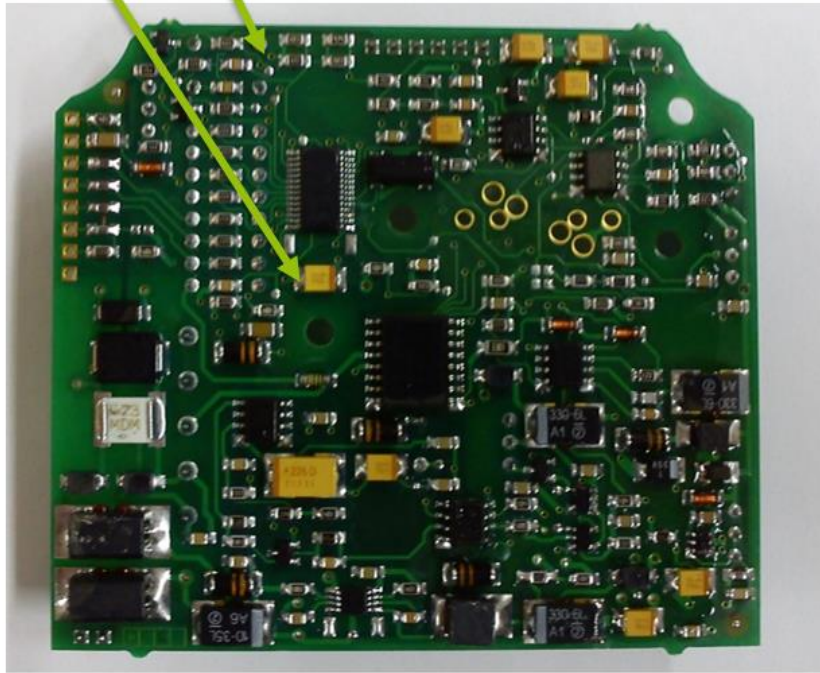
According to the applicant, Oldham must invest in a RoHS-compliant line to eliminate the use of lead in its welds (solder joints, solder composed of 40 % Sn, 60 % Pb, SnPb60), which represents less than 1 % of the weight of the card.

¹ The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

Figure 1: Main board of a gas detector

SMT-components-process → non-Lead-Free → requires 200K€ investment

Through-hole-components → 50% ROHS-compliant (selective soldering) / 50% non-ROHS-compliant



“These financial investments are important; the option of subcontracting electronic cards to a supplier equipped with a lead-free process is also possible. The strategic choice to invest in a new production line or to subcontract will be effective during the month of January 2017. The modification of our cards will then take at least 12 months (about 100 different cards to modify). The date of July 22, 2017 valid until today will not be held.”

The applicant explains that the main reason why Oldham has not yet achieved RoHS compliance is that Oldham has faced four changes of ownership since 2013. Actions were put on hold due to some changes in strategy and the freeze of investments as part of successive shareholder changes.

For details, please check the applicant’s exemption request and answers to the clarification questionnaire under: <http://rohs.exemptions.oeko.info/index.php?id=277>

The objective of this consultation and the review process is to collect and to evaluate information and evidence according to the criteria listed in Art. 5 (1) (a) of Directive 2011/65/EU (RoHS II), which can be found under:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32011L0065:EN:NOT>

If you would like to contribute to the stakeholder consultation, please answer the following questions:

Questions

1. The applicant has requested an exemption, proposing the following wording:
“*Use of lead in welds for gas detectors*”
 - a. Do you agree with the scope of the exemption as proposed by the applicant?
 - b. Please suggest an alternative wording and explain your proposal, if you do not agree with the proposed exemption wording.
 - c. Please explain why you either support the applicant’s request or object to it. To support your views, please provide detailed technical argumentation / evidence in line with the criteria in Art. 5(1)(a) to support your statement.
2. Please provide information concerning possible substitutes or developments that may enable reduction, substitution or elimination, at present or in the future for the application addressed in the above requested exemption;
 - a. In this regard, please provide information as to alternatives that may cover part or all of the applicability range of *the application*;
 - b. Please provide data as to application specifications to support your view.
3. Please provide information as to research initiatives which are currently looking into the development of possible alternatives for some or all of the application range for which the exemption is requested.
 - a. Please explain what part of the application range is of relevance for such initiatives (in what applications substitution may be possible in the future).
 - b. Please provide a roadmap of such on-going research (phases that are to be carried out), detailing the current status as well as the estimated time needed for further stages.
4. The applicant estimates the lead quantity which would be used under the exemption to be around 3 % of the weight of the boards; around 500 kg per year, from which 75 % would enter the EU market.
Can you confirm these figures? Otherwise please provide information which you think to be more realistic and provide a rough calculation on which you base your figures.
5. According to the applicant, the overall worldwide market for fixed gas detection is about 600 M\$ and about 150 M\$ in Europe, which represents overall close to 300,000 units per year on the market (estimation).
Can you confirm these figures? Otherwise please provide information which you think to be more realistic.

6. Oldham provided the below list of other fixed gas detection manufacturers in the EU market.
- a. Honeywell
 - b. MSA
 - c. Det-Tronics
 - d. Dräger
 - e. GMI
 - f. Scott
 - g. RKI
 - h. RAE

Are you aware of other manufacturers of such fixed gas detection manufacturers in the EU and outside the EU?

7. Please provide an estimate of possible impacts on employment in total, in the EU and outside the EU, should the exemption not be granted. Please detail the main sectors for which impacts are expected, i.e. manufacturers, supply chain, retail, etc.
8. Do you see any impact on employment in the EU and outside the EU (besides at Oldham) should the exemption not be granted? Please detail the main sectors in which these impacts are expected – manufacturers, supply chain, retail, etc.
9. Please estimate
- a. the total volume of EEE affected by the exemption.
 - b. additional costs associated with a forced substitution should the exemption not be granted, and how this is divided between various sectors (e.g. private, public, industry: manufacturers, suppliers, retailers).
 - c. additional waste generated should the exemption not be granted.

In case parts of your contribution are confidential, please provide your contribution in two versions (public /confidential) and clearly mark the confidential information to avoid accidental publication. Please also note, however, that requested exemptions cannot be granted based on confidential information!

Finally, please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that Oeko-Institut/Fraunhofer IZM can contact you in case there are questions concerning your contribution.