

Exemption Request Form

Date of submission: 12/21/2016

1. Name and contact details

1) Name and contact details of applicant:

Company: OLDHAM SAS Tel.: +33 3 21 60 80 13
Name: T FOURLEGNIE E-Mail: tfourlegnie@tyco.com
Function: General Manager Address: RUE ORFILA-ZI EST - CS20417-62027 ARRAS- FRANCE

2) Name and contact details of responsible person for this application (if different from above):

Company: _____ Tel.: _____
Name: _____ E-Mail: _____
Function: _____ Address: _____

2. Reason for application:

Please indicate where relevant:

- Request for new exemption in: Use of lead in welds for Gas detectors
- Request for amendment of existing exemption in
- Request for extension of existing exemption in
- Request for deletion of existing exemption in:
- Provision of information referring to an existing specific exemption in:
 - Annex III
 - Annex IV

No. of exemption in Annex III or IV where applicable: _____

Proposed or existing wording: _____

Duration where applicable: _____

Other: _____

3. Summary of the exemption request / revocation request

Oldham must invest in an ROHS compliant line to eliminate the use of lead in its welds (40% Sn / 60% Pb), which represents less than 1% of the weight of the card. This 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.

4. Technical description of the exemption request / revocation request

(A) Description of the concerned application:

1. To which EEE is the exemption request/information relevant?

Name of applications or products: Gas detectors

a. List of relevant categories: (mark more than one where applicable)

- | | |
|----------------------------|-----------------------------|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 7 |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 8 |
| <input type="checkbox"/> 3 | X 9 |
| <input type="checkbox"/> 4 | <input type="checkbox"/> 10 |
| <input type="checkbox"/> 5 | <input type="checkbox"/> 11 |
| <input type="checkbox"/> 6 | |

b. Please specify if application is in use in other categories to which the exemption request does not refer: _____

c. Please specify for equipment of category 8 and 9:

The requested exemption will be applied in

X monitoring and control instruments in industry

in-vitro diagnostics

other medical devices or other monitoring and control instruments than those in industry

2. Which of the six substances is in use in the application/product?

(Indicate more than one where applicable)

X Pb Cd Hg Cr-VI PBB PBDE

3. Function of the substance: Components soldering for PCBAs_____

4. Content of substance in homogeneous material (%weight): 40% of soldering- less than 1%of total PCBA weight

5. Amount of substance entering the EU market annually through application for which the exemption is requested: We manufactured approximately 100 000 cards each years. The average weight of a PCBA is 160 grammes. Each year we produced 16 t of EEE

Please supply information and calculations to support stated figure.

6. Name of material/component: Lead soldering for PCBA

7. Environmental Assessment: _____

LCA: Yes

No

(B) In which material and/or component is the RoHS-regulated substance used, for which you request the exemption or its revocation? What is the function of this material or component?

In all our products we have electronic boards with lead

(C) What are the particular characteristics and functions of the RoHS-regulated substance that require its use in this material or component?

See §3 (Summary of the exemption request / revocation request)

5. Information on Possible preparation for reuse or recycling of waste from EEE and on provisions for appropriate treatment of waste

1) Please indicate if a closed loop system exist for EEE waste of application exists and provide information of its characteristics (method of collection to ensure closed loop, method of treatment, etc.)

We have a subcontractor (CHIMIREC) who collect our EEE waste and trat them

2) Please indicate where relevant:

X Article is collected and sent without dismantling for recycling

Article is collected and completely refurbished for reuse

Article is collected and dismantled:

The following parts are refurbished for use as spare parts: _____

The following parts are subsequently recycled: _____

Article cannot be recycled and is therefore:

Sent for energy return

Landfilled

3) Please provide information concerning the amount (weight) of RoHS substance present in EEE waste accumulates per annum:

- | | |
|-----------------------------------------------------------------------|---------------------|
| <input type="checkbox"/> In articles which are refurbished | _____ |
| <input type="checkbox"/> In articles which are recycled | _____ |
| <input type="checkbox"/> In articles which are sent for energy return | <u>5,447 tonnes</u> |
| <input type="checkbox"/> In articles which are landfilled | _____ |

6. Analysis of possible alternative substances

(A) Please provide information if possible alternative applications or alternatives for use of RoHS substances in application exist. Please elaborate analysis on a life-cycle basis, including where available information about independent research, peer-review studies development activities undertaken

Request for extension of existing exemption. After our soldering will be with no Lead (Tin)

(B) Please provide information and data to establish reliability of possible substitutes of application and of RoHS materials in application

7. Proposed actions to develop possible substitutes

(A) Please provide information if actions have been taken to develop further possible alternatives for the application or alternatives for RoHS substances in the application.

(B) Please elaborate what stages are necessary for establishment of possible substitute and respective timeframe needed for completion of such stages.

Soldering with no Lead , Delay July 2018

8. Justification according to Article 5(1)(a):

(A) Links to REACH: (substance + substitute)

1) Do any of the following provisions apply to the application described under (A) and (C)?

- Authorisation
 - SVHC
 - Candidate list
 - Proposal inclusion Annex XIV
 - Annex XIV
- Restriction
 - Annex XVII
 - Registry of intentions
- Registration

2) Provide REACH-relevant information received through the supply chain.
Name of document: _____

(B) Elimination/substitution:

1. Can the substance named under 4.(A)1 be eliminated?
X Yes. Consequences? Soldering with no Lead
 No. Justification: _____
2. Can the substance named under 4.(A)1 be substituted?
X Yes.
X Design changes:
X Other materials: No Lead soldering
 Other substance:
 No.
Justification: _____

3. Give details on the reliability of substitutes (technical data + information): See attached document (S3X-56M)

4. Describe environmental assessment of substance from 4.(A)1 and possible substitutes with regard to

- 1) Environmental impacts: Lead can accumulate in the bodies of aquatic organisms and those of the soil. The functions of phytoplankton can be disrupted when lead is present. Phytoplankton is an important oxygen source in the seas and many larger marine animals feed on it. Soil functions are disrupted by lead, especially near farmlands, where extreme concentrations can be present. Soil organisms also suffer from lead poisoning.
- 2) Health impacts: Lead can penetrate in human body when ingesting food, water or air. Lead can have several undesirable effects, such as: -

Disturbance of hemoglobin biosynthesis and anemia. - Increase in blood pressure. - Kidney Problems. – Miscarriages. - Brain Damage. - Decline in male fertility....

3) Consumer safety impacts: See Health impacts

⇒ Do impacts of substitution outweigh benefits thereof?

Please provide third-party verified assessment on this: Tin Soldering with no

Lead

(C) Availability of substitutes:

- a) Describe supply sources for substitutes: Lead free soldering is a standard product _____
- b) Have you encountered problems with the availability? Describe: We need time to redesign our PCB (see §3)_____
- c) Do you consider the price of the substitute to be a problem for the availability?
 Yes No
- d) What conditions need to be fulfilled to ensure the availability?
Compliance of our print circuit boards

(D) Socio-economic impact of substitution:

⇒ What kind of economic effects do you consider related to substitution?

- Increase in direct production costs
- Increase in fixed costs
- Increase in overhead
- Possible social impacts within the EU
- Possible social impacts external to the EU

X Other: We just need more time

⇒ Provide sufficient evidence (third-party verified) to support your statement: _____

9. Other relevant information

Please provide additional relevant information to further establish the necessity of your request:

None

10. Information that should be regarded as proprietary

Please state clearly whether any of the above information should be regarded to as proprietary information. If so, please provide verifiable justification:

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