

1.9 Attachment: Application Form

Exemption Request Form

Date of submission: 30.06.2017

1. Name and contact details

1) Name and contact details of applicant:

Company: Andreas Stihl AG & Co KG Tel.: +49 7151 26 2191
 Name: Dr. Ute Dawin E-Mail: ute.dawin@stihl.de
 Function: Manager Certification Battery and Electric Products Address: Andreas-Stihl-Str. 4, 71336 Waiblingen

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

Company: Andreas Stihl AG & Co KG Tel.: +49 7151 26 2574
 Name: Dr. Christina Wedel E-Mail: christina.wedel@stihl.de
 Function: Senior Manager Regulatory Affairs Address: Andreas-Stihl-Str. 4, 71336 Waiblingen

2. Reason for application:

Please indicate where relevant:

- Request for new exemption in:
- 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: 41

Proposed or existing wording: existing wording

Duration where applicable: 5 years

Other: _____

3. Summary of the exemption request / revocation request

see Annex

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: hand-held combustion engines

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 | <input type="checkbox"/> 9 |
| <input type="checkbox"/> 4 | <input type="checkbox"/> 10 |
| <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 11 |
| <input checked="" type="checkbox"/> 6 | |

b. Please specify if application is in use in other categories to which the exemption request does not refer: Today's exemption may also apply to other categories, but I am not aware of products using it.

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

The requested exemption will be applied in

- 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)

- Pb Cd Hg Cr-VI PBB PBDE

3. Function of the substance: Alloy component in solder to control melting point

4. Content of substance in homogeneous material (%weight): ~37%

5. Amount of substance entering the EU market annually through application for which the exemption is requested: < 3.5t

Please supply information and calculations to support stated figure. see Annex

6. Name of material/component: Solder in ignition module and other electric or electronic engine control systems

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?

see Annex

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

see Annex

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.)

Ignition control moduls and similar devices need to be seeled with epoxy resin and therefore cannot be recycled. (see Annex for explanation)

2) Please indicate where relevant:

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

no information available, different in member states

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 checked="" type="checkbox"/> In articles which are sent for energy return | <u>no information available</u> |
| <input checked="" type="checkbox"/> In articles which are landfilled | <u>no information available</u> |

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**

Lead-free solders have been tested positive in this application.

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

Even though we have no data yet from a high population in the field. Laboratory tests and field testing results were positive.

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.**

Yes, alternatives have been evaluated in cooperation with the component supplier and were tested positive.

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

In production the change-over to lead-free solder can be done until mid 2019. Since we have some very slow moving products, we need additional time to clear the supply chain. We also need the time to confirm the reliability in the field with a sufficiently high number of products. The start of production of the lead-free versions will not be delayed by the exemption renewal. The renewal will reduce the need to scrap lead-containing versions, which cannot be recycled.

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

Pb is included in REACH, but for different product categories.

SVHC

Candidate list

Proposal inclusion Annex XIV

Annex XIV

Restriction

Annex XVII

Registry of intrusions

Registration

2) Provide REACH-relevant information received through the supply chain.

Name of document: _____

(B) Elimination/substitution:

1. Can the substance named under 0(A)1 be eliminated?

Yes. Consequences? _____

No. Justification: _____

2. Can the substance named under 0(A)1 be substituted?

Yes.

Design changes:

Other materials:

Other substance:

No.

Justification: _____

3. Give details on the reliability of substitutes (technical data + information): _____

4. Describe environmental assessment of substance from 0(A)1 and possible substitutes with regard to

1) Environmental impacts: _____

2) Health impacts: _____

3) Consumer safety impacts: _____

⇒ Do impacts of substitution outweigh benefits thereof?

Please provide third-party verified assessment on this: _____

(C) Availability of substitutes:

- a) Describe supply sources for substitutes: _____
- b) Have you encountered problems with the availability? Describe: _____
- 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? _____

(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
- Other: impact of recall if extension is not approved
- ⇒ 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:

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:
