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An: rohs.exemptions@oeko.de
Betreff: ROHS Exemptions
For the attention of Stephanie Zangl

ROHS Exemption No. 6: Harmonisation with ELV exemption

During our recent discussions regarding the ELV Directive exemptions, EGGA made representations for the retention of the exemption for galvanized steel containing up to 0.35% lead by weight. We understand that the COM proposal now includes retention of this exemption.

It was also mentioned in your report to the Commission that there was a need to harmonise the wording of the ROHS and ELV exemptions in future, where it was relevant to do so. In line with this objective, we would like to request that attention is paid to the wording of exemption No. 6 in the ROHS. The current wording is vague compared to the ELV entry and it is unclear to some readers as to whether it includes the presence of lead in galvanized steel.

On the basis that the same technical reasons are still applicable in electrical applications for not being able to meet the 0.1% limit for lead in galvanized steel, it would be very helpful if the wording could be harmonised with the relevant ELV exemption as follows:

“Steel for machining purposes and galvanized steel containing up to 0.35% lead by weight”

This would remove some uncertainty with customers and, assuming that the types of steel requiring the exemption (i.e. free machining steel and galvanized steels) are the same for ROHS as for ELV, this would create a much tidier situation.

Please contact me if you require any further clarification of this submission.

Best regards

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