

**Contribution to the stakeholders consultations of the European Association Contact Material Manufacturers (EACMM)**

**Cadmium and its compounds in electrical contacts and cadmium plating except for applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations (exemption 8)**

During the last evaluation in 2006, the conclusion was drawn that a general exemption no. 8 does not seem to be justified since alternative materials do exist and are already in use (position agreed by applicant and stakeholders). It was recommended to grant a 3 year transition period and then to withdraw the exemption. In the meantime industry should request more specific exemptions for those applications where substitution is not feasible. Furthermore it was proposed to split the current wording in two:

8. (a) Cadmium and its compounds in electrical contacts until 1 July 2009, except for mechanical pellet-type one-shot thermal cut-offs as from 1 July 2007 and except for applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations.

AND

8. (b) Cadmium plating as defined in Directive 91/338/EEC except for applications banned under Directive 91/338/EEC amending Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations.

1. Please state whether you agree with the above cited conclusions of the **previous evaluation** or not and justify your statement. What has changed since 2006?

At this time there is no new information available. EACMM therefore agrees with the findings of the earlier stakeholders consultation finalized in 2006.

2. Please specify exactly which **applications** are covered by this exemption. What is the **technical function** of cadmium in the applications?

At this stage all applications are covered by this exemption except the mechanical pellet-type one-shot thermal cut-offs.

3. Please state the **amount of cadmium** used per application, the cadmium content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 8 put on the EU market annually.

4. Please justify whether and in which of these applications the use of cadmium and its compounds is still technically necessary and in which it can be **substituted**.

At this stage substitutes exist for all applications. This is leading in certain cases to needed adaptations in the design of the electrical contact, an issue which was already indicated during the last stakeholder's consultation.

5. Please describe the **research** and other efforts to replace cadmium and its compounds in the applications in which you still consider it as irreplaceable.

Not applicable

6. Please provide a **roadmap** with activities, milestones and timelines towards the replacement of cadmium in these applications

Not applicable

7. Assuming the current exemption will be given an **expiry date**, what date do you think is technologically feasible for industry?

As substitute material already exists the proposed date should be feasible.

8. If you do not agree with the wording proposed during the last evaluation, please propose a **new wording** and justify your proposal.

Not applicable.