

Statement to Proposal 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.

1. We disagree with the expiration date 01.07.2009.

Based on the experience we derived from the past, a transition period of at least 4 years is needed for replacing AgCdO. Therefore the expiration date should be extended at least one additional year to 31.12.2010 as already stated in the 2006 meeting with the Oeko-Institut.

Replacing AgCdO in electrical contacts needs time because still there is not a one by one substitute available.

Therefore a variety of different contact materials multiplied by the matching of materials has to be chosen out for each switch type. Reaching the related Safety Standards like EN 61058, UL 1054 and a lot of customer standards a bundle of tests and long term evaluations have to be carried out. For example for one switch family we made more than 20 tests and investigations in the last two years and could not find any material match to meet all of the above safety requirements. To be sure to stay within the safety requirements more time is necessary to get the AgCdO contacts out of the last all of our switch families. Therefore a sufficient transition period is needed as stated above.

2. Electrical contacts in switches for safety applications.

3. The annual amount of CdO for our applications remains at 3 to 5 kg.

4. Switches in safety applications with non predictable load.

5. More than 100 tests and investigations in the last 3 years have been arranged. We are still in the phase to get our last switch families transferred to any substitute in the future. At present we do not expect any irreplaceable application.

6. Ongoing project for replacement. Time schedule mainly depends on disposability of the material and geometry of the needed contacts.

7. Based on the experience we derived from the past, a transition period of at least 4 years is needed. The expiration date should be extended at least one year to 31.12.2010.

8. Cadmium and its compounds in electrical contacts until 31.Dec. 2010, 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.