

Specific questions request 1

“Lead in solders for the connection of very thin enameled wires with a terminal”

The following specific questions should be answered in your stakeholder contribution if you support request 1 to be granted / rejected:

1. Please explain in which RoHS relevant **products / applications** the low-voltage switch and control gear is used.
2. Are **RoHS-compliant products**, which are equivalent to the applicant’s products, already available on the market?
3. The applicant states that a **new connection design** is in preparation, which, however, takes around 3 to 4 years to be ready for use. The RoHS Directive has been enacted in 2003, and the ban of lead is valid since July 2006. Please explain why manufacturers are not ready with the RoHS compliant products and which **efforts** they undertook at which time in order to achieve RoHS compliance on time.

4. The **wording** of the requested exemption is not clear. A different wording is therefore proposed:

Lead in solders to solder copper wires enclosed in enamels with a decomposition temperature of at least 450 °C to the terminals of low-voltage switch- and control-gear.

Please state whether or not you agree with this proposal and justify your argument.

5. Please provide the total amount of lead used in such applications in products sold in Europe (or worldwide, if data for Europe are not available)
6. A **similar exemption request** had been submitted in a previous stakeholder consultation with the following wording:

Lead in solders for the soldering of thin copper wires of 100 µm diameter and less in power transformers.

A strict control of the soldering temperature and the process duration enables the soldering of enamelled copper wires with a diameter down to 100 µm using RoHS-compliant solders. Please explain why an exemption is requested without reference to the **wire thickness**. Why should the exemption be necessary for wires thicker than 100 µm?