



# METALLURGICA ALTA BRIANZA S.p.A.

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Lecco, 18/01/2023

Dear **Customer**

To the kind attention of the  
**RoHS Directive manager**

Subject: **European Directive 2011/65/EU (RoHS 2) and subsequent amendments**

Dear customer,

our company continues, with regard to its competence, the application of the **European Directive 2011/65/EU (RoHS 2) of the European Parliament and Council of 8th June 2011** and subsequent Directives issued to supplement and/or amend.

This Directive, with successive amendments and integrations, regulate the use of dangerous substances in electrical and electronic equipments (WEEE) manufacture.

**The production process of METALLURGICA ALTA BRIANZA S.p.A. consists in the transformation of hot rolled material, purchased within the European Community, into drawn, peeled and grounded material, classified in article 3 by the directive in question as "Homogeneous Material".**

***"Article 3 - Definition of Homogeneous Material": a material of uniform composition or a material consisting of the combination of several materials, which cannot be divided or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.***

## **Specific informations on Lead element**

As is known, the RoHS 2 Directive prescribes that certain substances are not contained in electrical and electronic equipment (WEEE); among these we note **Lead (CAS 7439-92-1)**, present as alloying element in the chemical composition of some steel qualities marketed by our company.

With subsequent amendments to the Directive, there have been defined some **exemptions to the ban on the use of Lead** as an alloying element in steel for mechanical processing, depending on the different WEEE categories there disciplined.

Here below we report the list of different identified WEEE categories and the detail of foreseen exemptions.



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	WEEE categories
1	Large household appliances
2	Small household appliances
3	IT and telecommunications equipment
4	Consumer equipment
5	Lighting equipment
6	Electrical and electronic equipment
7	Toys, leisure and sport equipment
8	Medical devices
9	Monitoring and control equipment, including industrial ones
10	Automatic dispensers
11	Other WEEE not included in this list

Exemption's subject	Exemption's expiration
for categories from 1 to 7, for category 10 and for categories 8 and 9 other than in-vitro diagnostic medical devices and industrial monitoring and control instruments	<b><u>Exemption still in force under a transitional regime (*)</u></b>
for category 8 - in vitro diagnostic medical devices	<b>Exemption expires on July 21<sup>st</sup> 2023</b>
for category 9 - industrial monitoring and control instruments, and for category 11	<b>Exemption expires on July 21<sup>st</sup> 2024</b>

(\*): the directive provided for an expiry date on 21<sup>th</sup> July 2021, but some companies has submitted a prorogation request according to directive 2011/65/UE itself, Article V. The exemption will remain in force until the end of the revision process. It's possible to find out informations about that on European Community's website, at link: [https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive/implementation-rohs-directive\\_en](https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive/implementation-rohs-directive_en)



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Upon expiry of these exemptions, the use of Lead as an element present in the composition of homogeneous materials will be allowed with a **maximum threshold of 0,1% by weight.**

For further informations, the complete European Directive 2011/65/EU, with references to all performed amendments, is available through the following link:

<https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX%3A02011L0065-20211101&qid=1646233103601#M64-1>

In the Certificates attached to the material, the chemical composition is shown as indicated in the documents we receive together with the raw materials.

Always at your disposal for further clarification, we offer our best regards.

**Metallurgica Alta Brianza S.p.A.**  
Responsabile Controllo Qualità  
GIOVANNI POZZI