



METALLURGICA ALTA BRIANZA S.p.A.

ACCIAI TRAFILATI, PELATI E RETTIFICATI

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Lecco, 02/08/2019

Dear Customer:

Subject: New information dated 1st March 2018 with reference to the European Directive 2011/65 / EU (ROHS2)

Introduction

As is known, the RoHS-2 Directive prescribes that certain substances, **including lead**, are not contained in electrical and electronic equipment (WEEE). However, maximum concentration thresholds in "homogeneous materials" are allowed, and **some exemptions are provided for specific applications**.

"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.

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".

Among the exemptions concerning lead, for **steel industry** it is of interest, as indicated above, the exemption 6a of Annex III, concerning:

"lead as an alloying element in steel for machining and galvanized steel containing up to 0.35% lead by weight".

Exemption classification 6a

Pursuant to art. 5 paragraph 2 of the RoHS-2 Directive, exemption 6a had formally ceased its validity starting from the last **21st July 2016**, a term that could however be renewed (upon decision of the EU Commission) by submitting a specific and documented application within the deadline.

Given the numerous requests to renew the expiring exemptions, the EU Commission had established a reasonable period for its decision-making process.

News MARCH 1st 2018 Delegated Directive 2018/739

With regard to the modification of exemption 6(a) in Annex III of the RoHS-2 Directive (lead as an alloying element in some types of steel), we inform you that in the Official Journal of the European Union L. 123, it was published the relative **DELEGATED DIRECTIVE (EU) 2018/739** available through the following link:

[https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32018L0739&qid=1532590796334&from=IT)

[content/IT/TXT/PDF/?uri=CELEX:32018L0739&qid=1532590796334&from=IT](https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32018L0739&qid=1532590796334&from=IT) for the renewal of the expired exemptions on July 21st 2016 is confirmed.

Member States shall adopt and publish **by 30th June 2019** the laws, regulations and administrative provisions necessary to comply with this Directive.

Following the EU directive 2018/739, the original exemption 6 (a) is therefore divided into two separate sections, as shown here:

6(a)-I

Lead as an alloying element in steel for mechanical processing containing up to 0.35% lead by weight and in hot dip galvanized steel components for lots and containing up to 0.2% lead by weight expires:

- July 21st 2021 for the categories from 1 to 7 and to category 10".



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6(a)

Lead as an alloying element in steel for mechanical processing and in galvanized steel containing up to 0.35% lead by weight expires:

- **July 21st 2021** for categories 8 and 9 other than in-vitro diagnostic medical devices and industrial monitoring and control instruments;
- **July 21st 2023** for category 8 - in vitro diagnostic medical devices;
- **July 21st 2024** for category 9 - industrial monitoring and control instruments, and for category 11;

The categories of WEEE covered by this Directive are:

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

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