



# **METALLURGICA ALTA BRIANZA S.p.A.**

**ACCIAI TRAFILATI, PELATI E RETTIFICATI**

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Lecco, 11/11/2020

**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 8<sup>th</sup> 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.

METALLURGICA ALTA BRIANZA S.p.A., keeps continuously on monitoring its suppliers in order to guarantee its customer the full compliance with Directives and a correct information related to products and articles composition.

**All our suppliers informed us that they have fulfilled the duties imposed by Directives, confirming their compliance to.**

**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 the Lead, present as alloying element in the chemical composition of some steel qualities marketed by our company.

The complete list of use restricted substances is included in Directive's Annex II.

These Annex has been amended by **Delegated Directive (EU) 2015/863 dated March 31<sup>st</sup> 2015, also known as RoHS 3**, which introduces other four use restricted substances; these substances are not involved in our company's manufacturing process, nor figures as components in marketed products.



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Use restrictions are, however, not absolute, but maximum concentration thresholds are allowed in "homogeneous materials", as reported in Annex II itself, and moreover some exemptions are provided by Annex III for specific applications.

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

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

## **6(a) exemption overview**

Pursuant to art. 5 paragraph 2 of the RoHS 2 Directive, exemption 6(a) had formally ceased its validity starting from the last 21<sup>st</sup> July 2016, a term that could have however been 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

Later, on 1<sup>st</sup> March 2018, in the Official Journal of the European Union L. 123, it was published the **DELEGATED DIRECTIVE (EU) 2018/739**, including an amendment for the RoHS 2 Directive, article III, 6(a) exemption (lead as alloying element for some steel types), stating the renewal of the 2016 expired term.

The complete Delegated Directive (EU) 2018/739 is available through the following link:

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

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)**

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

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

### **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 21<sup>st</sup> 2021** for categories from 1 to 7 and for category 10.



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WEEE categories covered by the 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 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

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

After the forecast term for 6(a) and 6(a)-I exemptions, Lead use in homogeneous materials composition will be allowed until a **maximum threshold of 0,1% by weight**, as reported in Annex II European Directive 2011/65/EU and successive amendment by Delegated Directive 2015/863/EU.

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

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