



METALLURGICA ALTA BRIANZA S.p.A.
ACCIAI TRAFILATI, PELATI E RETTIFICATI

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Lecco, 03/03/2021

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.

The following **exemptions from the ban on the use of Lead** as an alloying element in steel for mechanical processing are currently in force:

- **July 21st 2021** 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;
- **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.



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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.**

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

For further informations, 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>

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