

OUR DATE 09.01.2007  
OUR REF. MB/VS/RoHS6  
DEPARTMENT Environmental and European Affairs  
HANDLED BY Malte Becker  
TELEPHONE +32 2 716 27 43  
E-MAIL [malte.becker@electrolux.be](mailto:malte.becker@electrolux.be)

European Commission  
DG Environment, Unit G4  
Consultation Directive 2002/95/EC  
B- 1049 Brussels  
Belgium

Dear Sir or Madam,

Thank you for including Electrolux in the Stakeholder consultation on the “Adaptation to scientific and technical progress under Directive 2002/95/EC of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment for the purpose of a possible amendment of the annex”, launched 7 November 2006.

As one of the largest producers of Household Appliances in the European Union, Electrolux has gained significant experiences over the past years while preparing to provide RoHS compliant products by 1<sup>st</sup> July 2006.

We would like to submit comments on three of the proposed exemptions, regarding technology which is frequently used in Household Appliances today. **Electrolux does not agree to exempt these items**

15. “All electronics assemblies using lead in solder”
18. “Hexavalent Chrome Cr-VI when used as a passivate”
22. “Lead in Trimmer Potentiometer elements“, and

Referring to **item no. 18 “Hexavalent Chrome Cr-VI when used as a passivate”**, we would like to refer to our previous submissions following an earlier stakeholder consultation as well as comments during the TAC decision process. We are explicitly referring to communications to the European Commission dated 28.10.2005 (Joint submission of BSH, Electrolux and Fagor), 29.03.2006 and 23.05.2006.

For Household Appliances there are **technical and economical viable substitutes to Cr-VI surface coatings available**. Therefore we would like to reiterate the main arguments being provided and substantiated earlier.

- For Household Appliances there are suitable alternatives to Cr-VI in passivation coatings, such as Cr III, galvanized metal layers, Zinc flake techniques, and zirconium based passivation solutions.
- These new solutions show no reduced performance with regard to corrosion protection, friction, thread tolerance or thermal resistance
- These alternatives are also available in sufficient quantities to cover the production of Household Appliances.

ELECTROLUX HOME PRODUCTS CORPORATION N.V.  
ENVIRONMENTAL & EUROPEAN AFFAIRS

MAILING ADDRESS  
BELGICASTRAAT 17  
B-1930 ZAVENTEM, BELGIUM

TELEPHONE  
+32 2 716.27.40

VAT NO.  
BE 465.654.933

SITE  
[www.electrolux.com](http://www.electrolux.com)

OFFICE ADDRESS  
BELGICASTRAAT 17  
B-1930 ZAVENTEM, BELGIUM

TELEFAX  
+32 2 716.26.01

REG NO.  
632.462

BANK  
FORTIS BANQUE  
210-0056809-19

Please note that our **requirement of confidentiality regarding the detailed information in the previous correspondence on Cr-VI still maintains.**

Related to exemption requests no **15. “all electronics assemblies using lead in solder”**, Electrolux considers the transition to **Lead-free soldering** for components in **Household Appliances** as **solved**. Our suppliers are well-equipped and manage the processes for our applications.

Therefore Electrolux is opposing a general exemption for Lead solder in electronics and would like to state that for our Household Appliances **technical and economical viable alternatives** are available and already **in use for months**.

Furthermore, related to exemption request no. **22. “Lead in Trimmer Potentiometer elements”**, Electrolux confirms that our suppliers have developed suitable and reliable RoHS-compliant components for Household Appliances.

Therefore, Electrolux **does not agree to exempt Lead** in Trimmer Potentiometers elements.

Finally, we would like to emphasise that electronic components covered by the exemption requests 15 and 22 have to undergo field-data tests, bench-tests, electromagnetic compatibility tests and accelerated life-tests and to date have not shown inferior performance in comparison to previously used non-RoHS compliant components.

We remain at your disposal for any additional information you may require on this topic.

Kind regards

A handwritten signature in black ink, appearing to read "Viktor Sundberg", followed by a horizontal line.

Viktor Sundberg  
Vice-President Environmental & European Affairs