

Response to Request for RoHS-Related Information

Dear Madams/Sirs,

This letter is in response to your request for composition information, related to implementation of the European Union's Restriction on Hazardous Substances in electrical and electronic equipment (RoHS) Directive (2011/65/EU), and the related Waste Electrical and Electronic Equipment (WEEE) Directive (2002/96/EC).

You requested information regarding an abrasive product or products. The RoHS directive relates to substances in electrical and electronic products. Abrasive products in and of themselves are not considered "electrical or electronic equipment" (EEE) under WEEE and RoHS. In addition, to the extent that abrasive products are used with electrical or electronic tools, assuming that the abrasive products are being used in the way that they are intended to be used, they are temporary or releasable attachments and are not considered EEE. Instead, they are considered consumables and are not subject to the RoHS Directive. This view has been confirmed verbally with the UK Department of Trade and Industry (DTI). In addition, this is consistent with the May 2005 European Commission, Directorate-General Environment "Frequently Asked Questions" on RoHS and WEEE, p. 10 (discussing ink cartridges for printers as consumables that are not subject to RoHS).

I trust the above information is responsive to your request.

Please contact me if there are any additional questions.

Yours sincerely,



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