



Mr Kurt van der Hertem
DG Environment – Unit G4
European Commission
200, Rue de la Loi
1049 Brussels
Cc.
Mr Klaus Koegler (DG Environment)
Mrs Anna Passera (DG Environment)

Brussels, 1 March 2007
Sent by Email

Review of the ROHS Directive – Categories 8 & 9
Definition of “Industrial test and measurement instruments”

Dear Mr van der Hertem, Mrs Anna Passera,

The Japan Business Council in Europe (JBCE)¹ fully supports the introduction of the WEEE and ROHS Directives. Our member companies have worked hard to ensure compliance with the relevant obligations.

Concerning compliance with future ROHS requirements in relation to electrical and electronic equipment covered by categories 8 & 9 as set out in Annex 1A and 1B of the WEEE Directive, JBCE would like to address the subject of the definition of “industrial test and measurement instruments”.

¹ JBCE is an organisation for companies of Japanese parentage that operate in and are corporate citizens of the European Union. A large part of the JBCE membership consists of manufacturers of electrical and electronic equipment.

Definition of industrial test and measurement instruments

Generally, JBCE endorses the approach ERA Technology takes in its Final Report on the Review of the ROHS Directive - Categories 8 and 9 (July 2006).

We feel, however, that further clarification is necessary regarding the definition of industrial test and measurement instruments.

Indeed, the Final Report states on page 246 that a “*clear definition of these products is essential*”.

As an example ERA Technology makes reference to “*Products that would normally be within the scope of European Standard EN61010-1, section 1.1 (a). This would include equipment that is normally tested to this standard even though customer requirements might result in other standards being utilised*”.

JBCE considers this definition insufficiently clear and complete. In fact, the product scope/classification in EN61010-1² has in practice left much room for differing interpretations.

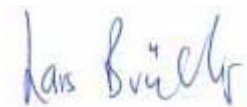
Additionally, the Low Voltage Directive, another fundamental piece of legislation affecting industrial test and measurement instruments, does not provide a detailed scope and product classification either.

JBCE would therefore, like to request the Commission to develop an improved definition of industrial test and measurement instrument in order to allow companies to prepare as well as possible for compliance with the categories 8 & 9 related ROHS Directive requirements.

² See Section 1 Scope and object – 1.1 Scope – 1.1.1 Equipment included in scope – point (a) “Electrical test and measurement equipment” and point (c) “Electrical laboratory equipment”.

Please contact us if you have any questions or would like to receive any further information.

Kind regards,

A handwritten signature in blue ink that reads "Lars Brückner". The signature is written in a cursive style with a blue ink color.

Lars Brückner

Chairman Environment Committee
Japan Business Council in Europe (JBCE)