

Miljøministeriet
Mia Udengaard Mikkelsen
Miljøstyrelsen
Tolderlundsvej 5
5000 Odense C

06/02/2023 in Struer

Høring vedr. ændring af RoHS-bekendtgørelsen (MST Id nr.: 6725129)

Dear Ms Udengaard Mikkelsen,

thank you for giving us the opportunity to comment on the draft document for the RoHS Directive. The RoHS directive is important for us as a company and our business, as it applies to almost all products we create and place on the Danish and European market. It is also important beyond EU borders, as it serves as role model for restricting hazardous substances in electronics in other important markets.

As for the draft document shared, we appreciate that the principles of the RoHS have not been touched and the majority of the legal act remains unchanged. Nevertheless, we would have appreciated an update of the Annex III on the exemptions from the essential requirements.

For the exemptions 6(a), 6(a)-I, 6(b), 6(b)-I, 6(b)-II, 6(c), 7(a), 7(c)-I and 7 (c)-II of Annex III we would have appreciated a clarification based on the scientific assessment carried out by the Öko-Institut e.V. and published in February 2022 by the European Commission. The suggested extensions reflect the current state of the industry and the availability of parts, which also we perceive in creating our products.

As a company we have committed to sustainable design and have created the first ever Cradle to Cradle certified speaker and have big aspirations for more products to follow. For doing this successfully, we rely on planning reliability and clear paths for us and our partners. We would therefore highly appreciate, if clarity on the exemptions could be created soon.

Yours sincerely,



Marlon Schrimpf
Product Compliance Lead
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