

Date: 01.03.2020

Information about ALCAR TPMS sensors

ALCAR TPMS sensors and sensors from other manufacturers distributed through ALCAR-Wheels GmbH (e.B. by LDL Technology S.A.S., Schrader International GmbH, Continental Aftermarket & Services GmbH, Pacific Industrial Co., Ltd., Huf Baolong Electronics Bretten GmbH).

Subject: Registrations in the ElektroG and BattG registers

Dear customer,

The ElektroG transposed the European WEEE Directive 2012/19/EU into German law and requires notification via the EAR (Foundation of Waste Electrical Equipment Registers). It regulates the placing on the market, the return and the environmentally friendly disposal of electrical and electronic equipment. According to WEEE Article 2 Paragraph 4 (d) and ElektroG Paragraph 2 (2) 7, this guideline / this law does not apply to electrical and electronic equipment in means of transport for the transport of people or goods (with the exception of electric two-wheeled vehicles that are not type-approved). These vehicles fall under the ELV end-of-life vehicle regulation, which means that the TPMS sensors are excluded from reporting to the EAR. Dazu finden Sie anbei eine Erklärung der CLEPA (European Association of Automotive Suppliers). The ELV (End of Life Vehicles Directive) implements the legal framework of the End of Life Vehicles Directive 2000/53 / EC at EU level. The proper treatment of end-of-life vehicles avoids direct harm to the environment and enables valuable materials to be recycled. The End-of-Life Vehicle Ordinance applies to passenger vehicles (vehicle class M1), light commercial vehicles (N1) and three-wheeled vehicles. ALCAR sensor suppliers implement this policy by supplying products with limited use of heavy metals.

The BattG regulates the return and disposal of batteries. The TPMS sensors contain a lithium button cell that is firmly anchored in the sensor and cannot be removed or replaced at the end of its life. According to BattG Paragraph 2 Definitions, it is neither a device battery (is not encapsulated and can be held in the hand) nor a vehicle battery (not intended for the starter, lighting or ignition of vehicles). The entire sensor must and can be disposed of as hazardous waste.

With best regards



Bernard Schnorrenberg
Product Management & Technical Support TPMS

ALCAR WHEELS GmbH

Leobersdorfer Straße 24, 2552 Hirtenberg, Austria, Tel.: +43/2256/801-0, info@alcar-wheels.com, www.alcar-wheels.com
FIRMENSITZ: Wien, FIRMENBUCHGERICHT: Handelsgericht Wien, Firmennummer: FN714791, STAMMKAPITAL EUR 5.000.000,- volleinzahlt, DVRNr.: 0544311
BANKVERBINDUNG: DIERSTE, IBAN: AT452011 100001050834(EUR) IBAN: AT952011 100061316498(USD), BIC: GIBAATWWXXX, UID-NR.: ATU17617700



Brussels, 04 07 2018

CLEPA Statement on the applicability of ELV vs RoHS / WEEE in the automotive industry

Legal basics

End of life vehicle directive 2000/53/EC (ELV)

ELV applies to vehicles, including components and materials of vehicles, as defined in article 3(1). ELV focuses on the recycling of vehicles, put on the European market. In addition to that, it restricts the use of specific substances in vehicles.

Waste electrical and electronic equipment directive 2012/19/EU (WEEE)

As of 15th of August 2018, WEEE applies to electrical / electronic equipment (EEE), as defined in article 2(1). It further excludes specific EEE for the means of transport (article 2(4)). This exclusion concerns vehicles, which are in scope of ELV.

WEEE focuses on the recycling of EEE placed on the European market.

Restriction of the use of certain hazardous substances in electrical and electronic equipment directive 2011/65/EU (RoHS)

RoHS applies to EEE, as defined in article 2(1). It further excludes specific EEE for the means of transport (article 2(f)). This excludes vehicles, which are in scope of ELV.

RoHS focuses on the restriction of the use of specific substances in EEE, placed on the European market.

Scope of this paper

WEEE directive opens its scope by 15th of August 2018. As a consequence, the directive covers further EEE, which were not in scope before. Exemplary examples of EEE new in scope include, but are not limited to clothes and furniture with installed electrical / electronic function such as:

- Bathroom cabinets with installed illumination
- Desks, which are adjustable by height through electrical function
- Shoes with installed blinking lights.

This position paper shall help companies to define, which directives apply to their parts, either ELV directive or RoHS / WEEE directive.

Applicability for vehicle parts containing EEE (non-exhaustive examples)

Systems or parts, which are specifically designed for the vehicle and which are essential for the safe function of a vehicle → ELV directive applies:

- Electrical wipers
- **Vehicle keys**
- Automotive lighting systems
- **Tire pressure monitoring systems.**

Installed assistance or entertainment systems or parts, which are specifically designed for the vehicle → ELV directive applies:

- Vehicle multimedia systems
- Installed navigation systems
- Electric window systems.



European Association of Automotive Suppliers

Mobile assistance systems or parts, which could also fulfill a non-automotive function → WEEE / RoHS directive applies:

- Mobile navigation systems
- Warning triangles with blinking function
- Mobile cellphone chargers.

Support of JAPIA organization

This statement is supported by JAPIA, the “Japan Autoparts Industry Organization”.

CLEPA is the European Association of Automotive Suppliers. Over 120 of the world's most prominent suppliers for car parts, systems and modules and 23 National trade associations and European sector associations are members of CLEPA, representing more than 3000 companies and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognised as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc.).

- Some **12 million** people are employed in the European automotive industry
- European automotive suppliers directly employ 5 million people
- European automotive suppliers invest over **€22bn** in RDI per year. They are the biggest private investor into research and innovation
- Per year, **18 million** vehicles are manufactured in Europe, contributing to the stability and growth of the European economy