

## Consultation Questionnaire on the revised manual (draft) methodology to identify and assess substances for possible restriction under the RoHS Directive

### Abbreviations and Definitions

DMEL	Derived minimum exposure level
EEE	Electrical and electronic equipment
RoHS	Directive 2011/65/EU on the restriction of certain hazardous substances
PNEC	Predicted no effect concentration

### Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract<sup>1</sup> to technically assist in a “Study to support the review of the list of restricted substances and to assess a new exemption request under RoHS 2 (Pack 15)”.

This questionnaire has been prepared in relation to the consultation on the revised manual (draft) methodology to identify and assess substances for possible restriction under the RoHS Directive.

Further details and a link to the manual is available under:

<http://rohs.exemptions.oeko.info/index.php?id=303>.

The questions addressed here have been compiled within this document for your convenience, but originally appear within the draft document as questions for stakeholders. It is advisable to locate the questions within the manual so as to understand the context in which each question is asked. For convenience, the questions appear with a reference to their place of appearance in the manual.

### Questions

1. Please specify additional lists of relevance for specifying substances identified or suspected of having hazardous properties. (Section 1.1., pg. 24)
2. Please specify additional lists of relevance for specifying substances used or suspected of being used in EEE. (Section 1.2., pg. 27)
3. Please submit reference to legislation and/or to standards where thresholds are defined for the criteria mentioned, e.g. under what circumstances and measurement conditions would

---

<sup>1</sup> The contract is implemented through Framework Contract No. FWC ENV.A.2/FRA/2015/0008 of 27/03/2015, led by Oeko-Institut e.V.

- the volatility of a substance potentially lead to emissions from an article in which it is contained (including non-intended use such as in case of breakage)? (Section 2.2., pg. 35)
4. Please indicate criteria for specifying when a potential for release is to be considered significant. (Section 2.2., pg. 35)
  5. Evidence of elevated levels measured in the environment shall be considered significant when end-point related limit values are exceeded (i.e. DMELs, PNEC, etc.). Do you support this specification - please explain your views and provide supporting data to explain them if relevant. (Section 2.2., pg. 35)
  6. For the purpose of specifying an exhaustive list of socio-economic impacts to be considered, please specify categories that should be taken into consideration. (Section 3., pg. 43)
  7. If you have any further comments, where relevant, please note the section/page to which they refer or quote the text of relevance from the manual to support understanding.

**Please note that answers to these questions are to be published as part of the available information relevant for the stakeholder consultation to be carried out as part of the revision of the manual. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.**