

Answers to the Public Consultation for Exemption No.34 of Annex III**• Name of stakeholders:**

Japan Electronics and Information Technology Industries Association (JEITA) ID number: 519590015267-92		Japan Electrical Manufacturers' Association (JEMA)	
Japan Business Machine and Information System Industries Association (JBMIA) ID number: 246330915180-10		Communications and Information network Association of Japan (CIAJ)	

• Name and contact details of responsible person

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In this answer we leave out the items in both questionnaires for which we have already replied either in the “Exemption Request Form” or the “First Questions for Clarification”.

Question 1.

Bourns has developed lead-free inks for low to mid-range resistance values, which are used on the trimming potentiometer products⁵. These substitutes are a form of calcium silicate borate glass. The applicability varies depending on the application of the part.

Do you know of similar developments of successfully applied lead-free solutions for cermet-based trimmer potentiometers that can at least partially replace the use of lead in this application?

Answer 1.

The addition of lead is necessary in order to restrain the change in resistance value due to environmental changes (temperature, current, voltage, etc.) on circuits in electrical and electronic equipment and for allowing the use of trimmer potentiometers in general-purpose usage conditions.

There are possibilities that “lead-free” trimmer potentiometers are used in circuits with small environmental changes, however as those parameters fluctuate during use, it is not possible to uniquely specify a covered application scope for which “lead-free” trimmer potentiometers can be used, for example, in electrical and electronic equipment.

Due to the above, according to our knowledge, we perceive that no products or development cases exist for which trimmer potentiometers can be substituted by “lead-free” solutions for specific applications.

Question 2.

Do you agree with the above proposal of GE Healthcare et al.

- a. to maintain exemption 34 as a separate exemption instead of integrating it into the scope of exemption 7c-I?
- b. to continue the exemption for another maximum validity period of five years with the current wording?
- c. Do you agree with the scope and proposed formulation, and the validity period of the exemption as proposed by the applicants? Please take into account the answers to question 1.
- d. Please suggest an alternative wording and explain your proposal, if you do not agree with the proposed exemption wording and requested validity period.
- e. Please explain why you either support the applicants' request or object to it. To support your views, please provide detailed technical argumentation / evidence in line with the criteria in RoHS Art. 5(1)(a).

Answer 2.

- a. **No. Our understanding is that it is (comprehensively) covered by the exemption provisions of 7(c)I.**
However, as asserted by GE Healthcare et al., confusion would arise in the market if the Exemption 34 provisions are suddenly excluded, therefore we would like you to consider an exemption wording that would result in an (objective) understanding that the Exemption 34 provisions are (comprehensively) covered by 7(c)I.
For example, "34. This exemption will be integrated and (comprehensively) covered by 7(c)I from XX-XX-201X onwards".
- e. If lead included in cermet-based trimmer potentiometers covered by the Exemption 34 provisions is also covered by Exemption 7(c)I provisions as asserted by GE Healthcare et al., we consider that Exemption 34 provisions should not be separated, but rather letting it be comprehensively covered as an exemption by the Exemption 7(c)I provisions would be easier for users to understand. Please refer to the contents described in our exemption 7(c)-I "Extension Request Form" for back-up detailed technical assertions and evidence documents.

Question 3.

Are there any other aspects you deem to be of importance for the future of the requested exemption?

Answer 3.

No (, there are none).