

## Initial Consultation Questionnaire for all Exemptions

The Oeko-Institut has been appointed by the European Commission, within a framework contract<sup>1</sup>, for the evaluation of applications for exemption from Directive 2011/65/EU (RoHS), to be listed in Annexes III and IV of the Directive.

As part of the evaluation, a stakeholder consultation is being held to collect information on the exemptions under assessment. The objective of this consultation and the review process is to collect and to evaluate information and evidence according to the criteria listed in Art. 5 (1) (a) of Directive 2011/65/EU (RoHS 2), which can be found under:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32011L0065:EN:NOT>

Requests for the renewal of a number of exemptions have been submitted and have been subject to an initial evaluation. Initial questions relevant for preparing a contribution for all exemptions under assessment appear below. If you would like to contribute to the stakeholder consultation, please read the applications and documents provided by the stakeholders so far and provide a contribution taking the following questions into consideration.

For further details, please check the applicant's exemption requests under the following exemption specific sections:

- [Annex III, Exemption 6\(a\)/6\(a\)-I](#) for lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead by weight
- [Annex III; Exemption 6\(b\)/6\(b\)-I](#) for lead as an alloying element in aluminium containing up to 0,4 % lead by weight, provided it stems from lead-bearing aluminium scrap recycling
- [Annex III, Exemption 6\(b\)-II](#) for lead as an alloying element in aluminium for machining purposes with a lead content up to 0,4 % by weight
- [Annex III, Exemption 6\(c\)](#) for copper alloy containing up to 4 % lead by weight
- [Annex III, Exemption 7\(a\)](#) for lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead)
- [Annex III, Exemption 7\(c\)-I](#) for electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezoelectronic devices, or in a glass or ceramic matrix compound
- [Annex III, Exemption 7\(c\)-II](#) for lead in dielectric ceramic in capacitors for a rated voltage of 125 V AC or 250 V DC or higher

Applicants of these exemptions have been sent a summary of their main argumentation and specific clarification questions for which responses are pending. A deadline for response has been set at the end of January. Answers to these clarification questions as well as the summary of argumentation shall be posted at the beginning of February. Where relevant, additional questions for stakeholders shall also be posted at this time. Stakeholders who are [registered](#) shall receive a notification once the additional information and questions have been posted online.

---

<sup>1</sup> The contract is implemented through Framework Contract No. ENV.B.3/FRA/2019/0017, led by Ramboll Deutschland GmbH.

## 1. Questions for stakeholders of relevance to all exemptions

1. The applicant has requested the renewal of an exemption currently listed in RoHS Annex III (see exemption specific page accessible through the links above):
  - a. Do you agree with the scope of the exemption as proposed by the applicant?
  - b. Please suggest an alternative wording and explain your proposal, if you do not agree with the proposed exemption wording.
  - c. Please explain why you either support the applicant's request or object to it.

To support your views, please provide detailed technical argumentation / evidence in line with the criteria in Art. 5(1)(a) to support your statement.

2. Please provide information concerning possible substitutes or elimination possibilities at present or in the future so that exemption could be restricted or revoked:
  - a. Please detail substitution and elimination possibilities and for which part of the applications in the scope of the requested exemption they are relevant.
  - b. Please provide information on research to find lead-free alternatives (substitution or elimination) that may cover part or all of the applications in the scope of the exemption request at present or in the future.
  - c. Please provide a roadmap of such on-going substitution/elimination efforts and research (phases that are to be carried out), detailing the current status as well as the estimated time needed for further stages.
3. Please provide any further information and/or data that you think is of importance to substantiate your views.

**Please specify for which exemption your contribution is submitted.**

**In case parts of your contribution are confidential, please provide your contribution in two versions (public /confidential). Please also note, however, that requested exemptions cannot be granted based on confidential information!**

**Finally, please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that Oeko-Institut can contact you in case there are questions concerning your contribution.**