

Contribution to the RoHS-Pack 28 Consultation, specifically Annex IV, Exemption 49

1. August 2025

Not for Publication

Subject: Contribution to the RoHS-Pack 28 consultation, specifically Annex IV, Exemption 49

General Comments

SPECTARIS welcomes the opportunity to contribute to the consultation for the incoming 28th pack of RoHS exemptions. We represent over 400 companies active in the hightech industry branches Optics, Photonics, analytical and Medical Technologies. Our member companies manufacture a wide array of complex products, some of which require hundreds of components falling under RoHS. For many of these products and applications there are no technically viable alternatives available at this time.

While SPECTARIS supports the goal of the RoHS Directive of further reducing the usage of hazardous materials to protect human health and the environment, we need to take some challenges into account. For some applications there are no viable alternatives available. Furthermore, the results of the Minamata Convention on Mercury must be taken into account.

As such, we fully support all the exemption requests brought forward, especially the request for renewal of Exemption 49 of Annex IV by Netzsch.

Questionnaire

Since we have no further supporting information to share regarding the questionnaire provided for this exemption request, we will limit our contribution to an agreement with the points brought forward by Netzsch.

Best regards,

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