

Brussels, 5 June 2015

RoHS EXEMPTION REQUEST – 2; STAKEHOLDER QUESTIONS D.D. 19 JUNE 2015

1. Do you agree with the proposed exemption wording and its requested duration of 7 years? If not, please provide alternative wording.

Initial Exemption Request 2015-2

"Lead in high voltage cables and cable assemblies for a rated voltage higher than 250kV DC, containing up to 4% lead by weight."

has been modified by applicant into:

"Allow the use of lead to a maximum of 4% by weight in High Voltage Cables and Cable Assemblies for a rated voltage higher than 250kV DC and to be used in Electron Microscopy applications"

Europacable emphasizes that cables and cable assemblies \geq 250kV are not in the scope of RoHS2. Technically there is no need to request an exemption. A client should specify the component he needs for compliance to RoHS2 of his EEE, if the EEE is designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current.

We recommend to complete the exemption request with the information on the voltage rating of the equipment, to ensure that only the equipment in the scope of RoHS are part of the exemption.

Wording proposed by Europacable for exemption request title:

Allow the use of lead to a maximum of 4% by weight in High Voltage Cables and Cable Assemblies for a rated voltage higher than 250kV DC and to be used in Electron Microscopy applications designed for use with a voltage rating not exceeding 1kV AC or 1,5kV DC."

2. Do you share the applicant's arguments, or are you opposed to the requested exemption? Please explain your answer in detail, in particular if you oppose the requested exemption. Please also explain if you have additional arguments to support the request.

No comments.

3. Do you agree to the applicant's information that there are no suppliers that provide > 250 kV cables that are RoHS compliant? Please provide information on lead-free thermal stabilizers used in cable insulation that may be suitable as substitutes for application in > 250 kV cables.

No. It is not correct to talk about RoHS compliant cable \geq 250 kV. HV cables \geq 250kV are not in the scope of RoHS2 Directive.

However, a client may specify the cable product according their needs.

All Europacable documents are confidential to Europacable members and must not be circulated outside the Association without prior approval of the Secretariat.

4. It is understood that the high voltage cables are specifically needed for the above mentioned application under Sub-Category 9 Industrial. Are you aware of other applications of high voltage cables in other equipment, which is in the scope of the RoHS Directive?

We are today not aware of other applications that would need exemption regarding the use of lead in HV cables for EEE.

5. There are other manufacturers delivering 300 kV TEM within the EU market, e.g. JEOL and Hitachi.
It is yet to be established if some or all of these other manufacturers support the exemption request. Please provide information as to why these manufacturers do not need the requested exemption, or alternatively, to clarify why granting the requested exemption is justified for the applicants 300 kV TEM, despite their being other such devices on the market that do not need the exemption?

It should be clarified first whether the 300kV TEM are considered as EEE, and if they fall in the scope of the Directive. Are they designed for use with a voltage rating not exceeding 1kV AC or 1,5kV DC?

Moreover, as explained under 1. and 3., HV cables $\geq 250\text{kV}$ are not in the scope of RoHS2 Directive. Therefore, cable manufacturers do not need an exemption under RoHS2.

6. Please provide information concerning any other aspects you deem to be of importance for the requested exemption.

No comments.

**In case parts of your contribution are confidential, please clearly mark relevant text excerpts or provide your contribution in two versions (public /confidential).
Finally, please do not forget to provide your contact details (Name, Organisation, e-mail and phone number) so that Oeko-Institut/Fraunhofer IZM can contact you in case there are questions concerning your contribution. Please also note, however, that requested exemptions cannot be granted based on confidential information!**