



## Answers to Consultation Questionnaire Exemption Request 2015-2

### *Exemption Request for „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“*

29 May 2015

JEOL Ltd.

#### Questions

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

No.

We insist that the exemption request should be withdrawn.

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.

We are opposed to the requested exemption.

Please see Answer 5 for details.

3. Do you agree to the applicant's information that there are no suppliers that provide > 250kV 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.

We do not agree that there are no suppliers that provide > 250kV cables that are RoHS compliant.

Please see Answer 5.

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?

No.

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?

We JEOL are opposed to the exemption request for the following reason:

We have developed a lead-free high-voltage cable (including the cable assembly) capable of high voltage up to 300 kV in cooperation with a major cable manufacturer in Japan, and our 300 kV transmission electron microscopes using this cable are already placed on the EU market.

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

None

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