

Consultation Questionnaire Exemption No. 13a (Annex III)

Exemption for „Lead in white glasses for optical applications“

Abbreviations and Definitions

EEE	Electrical and electronic equipment
Pb	Lead

Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract¹ for the evaluation of an application for granting an exemption to be included in or deleted from Annexes III and IV of the new RoHS Directive 2011/65/EU (RoHS 2) by the European Commission.¹

Spectaris e.V. has submitted the above mentioned request for exemption which has been subject to a first completeness and plausibility check. The applicant has been requested to answer additional questions and to provide additional information, available on the request webpage of the stakeholder consultation (<http://rohs.exemptions.oeko.info/index.php?id=226>).

According to the applicant, Pb is used in optical glass, which is applied in a wide variety of EEE, such as photographic lenses; lenses for video and television equipment; lenses for binoculars and telescopes; lenses for microscopes and endoscopes and for other medical and monitoring equipment, and others. Lead-based glasses are used because they have unique combinations of properties and characteristics that cannot be achieved by lead-free optical glass of alternative designs.

Spectaris details some of these properties including the light transmission performance; optical dispersion, thermal conductivity, birefringence and others. It is explained that alternatives exist in the form of lead-free glass, plastic lenses and alternative equipment design. Nonetheless, Spectaris state that alternatives are not available for the uses of optical glass where lead-based glasses are currently used.

For details, please check the applicant's exemption request at:
<http://rohs.exemptions.oeko.info/index.php?id=226>

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 II), which can be found under:

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

If you would like to contribute to the stakeholder consultation, please answer the following questions:

¹ Contract is implemented through Framework Contract No. ENV.C.2/FRA/2011/0020 led by Eunomia

Questions

1. The applicant has requested an exemption for “*lead in white glasses for optical applications*” specifying that such glasses are in use in products falling under various categories of Annex I. Should an exemption be granted it is to be added to Annex III of the RoHS Directive.
 - 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. According to the applicant, where alternatives have been developed, they have been implemented to eliminate the need for using leaded optical lenses. However, for most applications alternatives still do not exist that could allow fully replacing leaded optical lenses in the full application range.
 - a. Please provide information concerning possible substitutes or developments that may enable reduction, substitution or elimination, at present or in the future, of “*lead in white glasses for optical applications*”;
 - b. In this regard, please provide information as to alternatives that may cover part or all of the applicability range of leaded optical lenses;
 - c. Please provide quantitative data as to application specifications to support your view.

3. Please provide information as to research initiatives which are currently looking into the development of possible alternatives for some or all of the application range of lead-based white optical glasses.
 - a. Please explain what part of the application range is of relevance for such initiatives (in what applications may substitution be possible in the future).
 - b. Please provide a roadmap of such on-going research (phases that are to be carried out), detailing the current status as well as the estimated time needed for further stages.

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!