

JBCE comment on public consultation of "13a: Lead in white glasses used for optical applications" in 2015 consultation 1

Name and contact details

1) Name and contact details of applicant:

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Dear RoHS exemption evaluation team,

19, June 2015

Firstly, JBCE would like to highlight you that the exemption 13(a) in annex III can be applied to category 8&9 products for seven years from identified date when entry into force for each products, at the earliest July 2021.

The provision is clearly shown in the table in Q 9.1 "What is the difference between RoHS 1 and RoHS 2 regarding requirements for exemption?" of "RoHS2 FAQ" as follows:

http://ec.europa.eu/environment/waste/rohs_eee/pdf/faq.pdf

RoHS 2 Exemptions – maximum validity periods				
Exemptions EEE categories	Exemptions listed in Annex III as at 21 July 2011		Exemptions listed in Annex IV as at 21 July 2011	
	Expiry date specified	<i>No expiry date specified</i>	Expiry date specified	<i>No expiry date specified</i>
<i>Categories 1 to 7 and 10</i>	22 July 2011 – specified date	<i>22 July 2011 – 21 July 2016</i>	Not applicable	Not applicable
<i>Categories 8 and 9 general</i>	22 July 2014 – specified date	<i>22 July 2014 – 21 July 2021</i>	22 July 2014 – specified date	22 July 2014 – 21 July 2021
<i>Category 8 in vitro*</i>	22 July 2016 – specified date	<i>22 July 2016 – 21 July 2023</i>	22 July 2016 – specified date	22 July 2016 – 21 July 2023
<i>Category 9 industrial*</i>	22 July 2017 – specified date	<i>22 July 2017 – 21 July 2024</i>	22 July 2017 – specified date	22 July 2017 – 21 July 2024

Concerning our answer for your question in the consultation, we respond as follows:

Questions and Answers:

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?

We agree with the scope of the exemption 13(a) as proposed by the applicant. We have endorsed the application documentation before its submission. (Please see the cover page of *“Spectaris_ Exemption_Renewal_Request_13a_Final.pdf”* .)

For other questions, we have nothing to add to what Spectaris’ Renewal Request says.

In addition to the above, we would like to give our comment relating to “ 1st Questionnaire Exemption No.13a “ in the link below.

http://rohs.exemptions.oeko.info/fileadmin/user_upload/RoHS_Pack_7/Exemption_13a/150311_Ex_13a_Clarification-Questions_Answers.pdf

(1) About question for clarification 2. 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””*

As long as the questions in “Clarification questionnaire” are concerned, the consultants seem to focus mainly on leaded optical lenses, though Spectaris’ documentation covers other applications.

For lenses and other optical applications described in *“Spectaris_ Exemption_Renewal_Request_13a_Final.pdf”*, we’re not able to find possible substitutes or technical developments that may enable reduction, substitution or elimination, at present and in the future, of *“lead in white glasses for optical applications”*, as the *“Renewal Request”* describes in details.



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