

JBCE comment on public consultation of "13b: Cadmium and lead in filter glasses and glasses used for reflectance standards" 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

JBCE would like to highlight you that the exemption 13(b) 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/fag.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 | No expiry date specified |
| <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 No2 to No4 in the consultation, we support the applicant's documentation.

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