

Consultation Questionnaire Exemption No. 7c-II (renewal request)

Exemption for "Lead in dielectric ceramic in capacitors for a rated voltage of 125 V AC or 250 V DC or higher"

Abbreviations and Definitions

Pb lead

Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract¹ for the evaluation of applications for the renewal of exemptions currently listed in Annexes III of the new RoHS Directive 2011/65/EU (RoHS 2) by the European Commission.¹

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>

Murata et al. submitted a request for the renewal of the above mentioned 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, to be made available on the webpage of the stakeholder consultation (<http://rohs.exemptions.oeko.info/index.php?id=228>).

If you would like to contribute to the stakeholder consultation, please read the below summary of the exemption requests, and answer the questions further below.

Summary of the Exemption Request

Exemption 7c-II was a result of the 2008/2009² review of the former exemptions 5 and 7 of Directive 2002/95/EC (RoHS 1), as lead-free alternatives for high voltage ceramic capacitor components, as opposed to from lower voltage ceramic capacitors, were not available.

Murata et al. request the exemption be renewed, though with minor changes in the wording in order to clarify the scope. Despite of continued investigations, a substitution technology has not yet been found and Murata et al. see no prospects of finding one within the foreseeable future. According to Murata et al., the reason for the exemption presented by the stakeholders in 2009 is still valid, and consequently the exemption needs to be continued.

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

² (Carl-Otto Gensch, Öko-Institut e. V., et al. 19 February 2009) *Adaptation to scientific and technical progress under Directive 2002/95/EC: Final Report*. With the assistance of Stéphanie Zangl, Rita Groß, Anna Weber, Öko-Institut e. V. and Otmar Deubzer, Fraunhofer IZM. Freiburg: . Accessed July 14, 2015.
http://ec.europa.eu/environment/waste/weee/pdf/final_report1_rohs1_en.pdf;
http://ec.europa.eu/environment/waste/weee/pdf/report_2009.pdf, page 89 et seqq.

For details, please check the applicants' exemption requests at:
<http://rohs.exemptions.oeko.info/index.php?id=246>

Questions

1. Murata et al. request the renewal of Ex. no. 7c-II of Annex III. Murata et al., supported by JEITA et al.³, propose, however, a slightly changed wording to clarify the scope. The new wording would, according to Murata et al., not broaden the scope:

*Lead in dielectric ceramic in **discrete** capacitor **components** for a rated voltage of 125 V AC **or higher**, or **for a rated voltage of 250 V DC or higher**⁴*

- a. Do you agree with the scope and proposed formulation of the exemption as proposed by the applicants?
 - 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).
2. Please provide information concerning possible substitutes or developments that may enable reduction, substitution or elimination, at present or in the future, completely or in parts, of the Pb used in the scope of Ex. no. 7c-II;
 - a. In this regard, please provide information as to alternatives that may cover part or all of the applicability range of lead in high melting point solders;
 - b. 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 Pb in Ex. no. 7c-II.
 - a. Please explain what part of the application range is of relevance for such initiatives (in what applications substitution may 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.
 4. Are there any other aspects you deem to be of importance for the requested exemption?

³ See the exemption request of JEITA et al. for the continuation of exemption 7c-I.

⁴ Please also see the clarification questionnaire for exemption 7c-I concerning the scope clarification and alignment of all 7c-series exemptions.

In case parts of your contribution are confidential, please provide your contribution in two versions (public /confidential). Please also note, however, that requested exemptions cannot be granted based on confidential information!

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.

References

(Carl-Otto Gensch, Oeko-Institut e. V., et al. 19 February 2009) *Adaptation to scientific and technical progress under Directive 2002/95/EC: Final Report*. With the assistance of Stéphanie Zangl, Rita Groß, Anna Weber, Oeko-Institut e. V. and Otmar Deubzer, Fraunhofer IZM. Freiburg: . Accessed July 14, 2015.
http://ec.europa.eu/environment/waste/weee/pdf/final_reportl_rohs1_en.pdf;
http://ec.europa.eu/environment/waste/weee/pdf/report_2009.pdf