

## Questionnaire for Further Clarification

### Exemption Request 10 “Lead in micro-channel plate”

#### Background

The Öko-Institut together with Fraunhofer IZM has been appointed within a framework contract for the evaluation of applications for granting, renewing or revoking 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.

You have submitted the above mentioned request for exemption which has been subject to a first completeness and understandability check. As a result we have identified that there is some information missing and a few questions to clarify before we can proceed with the online stakeholder consultation on your request. Therefore we kindly ask you to provide answers for the following questions and to reformulate your request if necessary.

#### Questions

1. The scope of this exemption request is not quite clear. For which products exactly would this exemption be required?

→ Please see the attached files “RefNo1” and “RefNo2”.

2. Please provide an expiry date for the requested exemption.

→ We need this exemption until the end of 2029. A research on an alternative technology using Atomic Layer Deposition is going on in USA. However, it is still far from practical applications. Moreover, an American company has a patent on this technique till 2029.

3. Please provide a substantiated calculation of the amounts of lead that would be used in this application worldwide and in Europe.

→ According to the market share of the member company, the amounts of lead is estimated to be about 60kg worldwide.

4. JBCE writes in its exemption request that “The micro-channel plate (MCP) is an electronics component [...]”. In this case, the use of lead would be covered by exemption 7-c-I of the RoHS Directive “Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezoelectronic devices, or in a glass or ceramic matrix compound.

Taking this into account, please explain why you believe this exemption request still is required.

→ Before we had applied the exemption 7(c)-1, we discussed whether the MCP belongs to the electronics component with ERA technology. Please see the attached file “RefNo3” explaining the background.