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Photonics and Precision  
Technology

27 February 2012

**Stakeholder Comment to exemption request #12**  
**"Lead and cadmium in optical and filter glass in monitoring and control instruments (Category 9)"**

Dear Ms. Zangl,

In the framework of the current stakeholder consultation on exemptions from the substance restrictions in electrical and electronic equipment (RoHS Directive), I would like to point your attention to the importance of the exemptions 13a (lead in white glasses used for optical applications) and 13b (cadmium and lead in filter glasses and glasses used for reflectance standards) for the optical industry and numerous other industries using and relying on these optical glasses in their applications, which fall under virtually all categories (1-11) of the RoHS recast Directive. The use of lead and cadmium is indispensable for the proper functioning of a substantial number of applications used in communications, automotive, manufacturing and quality, healthcare and life science, energy-efficient lighting and displays, and renewable energy and security.

As is shown from the variety of these applications, the necessity for exemption 13a and 13b is by no means limited to monitoring and control instruments. In its report of 20 January 2009 (*Adaptation to scientific and technical progress under Directive 2002/95/EC*, page 159) the Öko-Institut acknowledged that the wording of these exemptions should be material-specific, since the list of applications making use of optical glasses amounts to several hundred and even a very detailed enumeration would never be complete.

Therefore, even though SPECTARIS supports the technical arguments of the exemption request currently under discussion, we would like to point out that, according to the current RoHS Directive, exemptions 13a and 13b are valid at least until July 2016 for categories 1-7 and 10 and at least until July 2021 for monitoring and control instruments (category 9) as well as medical instruments (category 8). Any review of these exemptions must take into account their material-specific character and has to be granted for all optical glasses as a material-specific exemption as we currently have it under the RoHS recast Directive, no matter their further application and subsequent RoHS category.

Yours sincerely



Birgit Ladwig