

Questionnaire

“Cadmium in phosphor coatings in imageintensifiers for X-ray images”

Background

The Öko-Institut together with Fraunhofer IZM has been appointed for the technical assistance in reviewing the requests for exemptions from the requirements of the RoHS Directive 2011/85/EU (RoHS II) 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 consultation on your request. Therefore we kindly ask you to reformulate your request taking the following points into consideration.

Questions

1. Are there any other x-ray applications apart from medical analysis? If yes, please specify the fields of application and give details whether these applications should be integrated in a possible exemption or not. In case certain applications are likely not to qualify for a possible exemption, please suggest a clear wording to distinguish these types of equipment from those for medical analysis.

The image intensifiers for which this exemption request has been requested are only used in medical applications. The intended use of the equipment of which the image intensifiers are part of is X-ray based interventional (surgery) treatment and diagnostics such as medical fluoroscopy

2. You propose an exemption until 31 December 2019 for cadmium in phosphor coatings in Image intensifiers for x-ray images. In addition, you request an unlimited exemption for spare parts for x-ray systems placed on the EU market before 1 Jan 2020. Could you provide an estimate for how long after a possible phase out on 31. December 2019 cadmium containing spare parts will be relevant?

There is a service obligation of 10 years but fluoroscopy and other X-ray imaging equipment has a lifetime of up to 25 years so spare parts would be needed for up to 25 years after exemption expires.

3. Could you please provide the cited article W. Huda, W. T. Rowlett and U. J. Schoef “Radiation dose at cardiac computed tomography: facts and fiction” J. Thorac. Imaging, 2010 Aug; 25(3) p 2014. [Abstract attached, full article has been ordered and will be supplied when available](#)