General questionnaire

The following questions can be used in two different ways:

1. To support an **exemption request** (the applicant's exemption request which is posted on the consultation website should already contain answers to these questions) or to argue why an exemption request is not justified.
2. To support an **existing exemption** or taken as a basis for requesting an amendment or the discontinuation of an existing exemption.

- § For which substance(s) or compound(s) should the requested exemption be valid? For the contact material silver cadmium oxide (AgCdO).
- § What is the application in which the substance/compound is used for and what is its specific technical function? Doorlocks & pressure switches for washing machines, and thermostats.
- § What is the specific (technical) function of the substance/compound in this application? Good electrical conductivity, durability and stability against welding. Also performance and endurance on high currents and temperatures.
- § Please justify why this application falls under the scope of the RoHS Directive (e.g. is it a finished product? is it a fixed installation? What category of the WEEE Directive does it belong to?). Our products are components for household appliances.
- § What is the amount (in absolute number and in percentage by weight) of the substance/compound in: i) the homogeneous material[1], ii) the application and iii) total EU annually for RoHS relevant applications? Annualy we use for doorlocks 18 kg of CdO, for pressure switches we use 53 kg of CdO, and for thermostats we use 9.8 kg of CdO. I these applications we use contacts AgCdO10.
- § Please check and justify why the application you request an exemption for does not overlap with already existing exemptions respectively does not overlap with exemption requests covered by previous consultations. We want to support an existing exemption.
- § Please provide an unambiguous wording for the (requested) exemption.

Documentation provided by stakeholders including replies to the questions above should take the following points into consideration:

- § Please justify your contribution according to Article 5 (1) (b) RoHS Directive

whereas:

- Substitution of concerned hazardous substances via materials and components not containing these is technically or scientifically either practicable or impracticable; Impracticable, sometimes unsafe, as we usually do not know where our products are used, and under which loads and enviromental conditions.
- Elimination or substitution of concerned hazardous substances via design changes is technically or scientifically either practicable or impracticable; Impracticable. Substitutions do not cover wide range of applications at the moment.
- Negative environmental, health and/or consumer safety impacts caused by substitution are either likely or unlikely to outweigh environmental, health and/or consumer safety benefits thereof (If existing, please refer to relevant studies on negative or positive impacts caused by substitution). Substitutions do not cover wide range of applications at the moment.

§ Please provide sound data/evidence on why substitution / elimination is either practicable or impracticable (e.g. what research has been done, what was the outcome, is there a timeline for possible substitutes, why is the substance and its function in the application indispensable or not, is there available economic data on the possible substitutes, where relevant, etc.). Our customers, producing household appliances, demand for our components higher reliability, higher endurance (switches produced for 50.000 operating cycles have now to endure 200.000 cycles) every year. There is a segment in washing machines production, which uses very high inrush loads (capacitive loads, from 30 to 50 A). AgCdO contact materials have proven to be long-term reliable in the past and satisfy safety requirements.

§ Please also indicate if feasible substitutes currently exist in an industrial and/or commercial scale for similar use. Yes, for narrow ranges of applications.

§ Please indicate the possibilities and/or the status for the development of substitutes and indicate if these substitutes were available by 1 July 2006 or at a later stage. Yes, for narrow ranges of applications.

§ Please indicate if any current restrictions apply to such substitutes. If yes, please quote the exact title of the appropriate legislation/regulation. No, not in our knowledge.

§ Please indicate benefits / advantages and disadvantages of such

substitutes. Substitutions do not cover wide range of applications at the moment. AgCdO contact materials have proven to be long-term reliable in the past and satisfy safety requirements.

§ Please state whether there are overlapping issues with other relevant legislation such as e.g. the ELV Directive that should be taken into account.

§ If a transition period between the publication of an amended Annex is needed or seems appropriate, please state how long this period should be for the specific application concerned. We need a substitute for long-term reliability, safety, and wide range of loads. We cannot say when manufacturers of contacts will provide satisfactory substitutes.