

Questionnaire Exemption Request No. 1

“Cadmium and its compounds in electrical contacts or one shot pellet type thermal cut-offs with current ratings of 5 Amperes or more, for use in monitoring and control instruments (Category 9.)”

Background

Test & Measurement Coalition (TMC) applies for an exemption for “Cadmium and its compounds in electrical contacts or one shot pellet type thermal cut-offs with current ratings of 5 Amperes or more, for use in monitoring and control instruments (Category 9.)”.

A very similar exemption was reviewed in 2008 resulting in its inclusion into Annex III of RoHS II (exemption 8(a) and 8(b)). The relevant excerpt of the final report is available on the project website at <http://rohs.exemptions.oeko.info/index.php?id=109>.

Exemption 8(a) will expire on 1 January 2012. Exemption 8 (b) will remain valid for category 9 equipment until 21 July 2021 respectively 21 July 2024 for industrial monitoring and control instruments.¹

The applicant puts forward the following main arguments:

1. The main argument of the applicant is that for electrical contacts switching currents of 5 Amperes or more he was unable to find suppliers of suitable cadmium free contacts in relays, contactors etc.
2. The applicant proposes for the exemption a maximum validity until 2021. Do you agree with this expiry date, or would an earlier expiry be feasible?
3. The applicant states that mainly the amperage is a relevant factor whereas other characteristics like frequency of switching, bandwidth or voltage are not deemed relevant to the needs of this exemption.
4. The applicant confirms that Cadmium free one shot thermal cut-offs alternatives have become available.

For details, please check the applicant’s exemption request at <http://rohs.exemptions.oeko.info/index.php?id=109>.

¹ Due to a standard 7 year validity period for category 9 exemptions as stated in Article 5 (2) of Directive 2011/65/EU. Category 9 equipment will be included into the scope of the RoHS Directive starting on 22 July 2014 and 22 July 2017 respectively for industrial monitoring and control instruments.

This exemption request has been subject to a first completeness and plausibility check. The applicant has been requested to answer additional questions and to provide additional information (c.f. link above).

In the document “General comments on Oeko Institute questionnaires”, TMC justifies the exemption request with formal and procedural arguments. Such formal and procedural arguments cannot be taken into account during the evaluation by Öko-Institut and Fraunhofer IZM. Rather, 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 you can download from here: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32011L0065:EN:NOT>.

If you would like to contribute to the stakeholder consultation, please answer the following questions:

Questions

1. Please state whether you either support the applicant’s request or whether you would like to provide argumentation against the applicant’s request. In both cases please provide detailed technical argumentation / evidence to support your statement.
2. Against the background that Cadmium free one shot thermal cut-offs alternatives have become available the question arises whether these substitutes are type-tested or type-approved in order to avoid the rework and requalification of the equipment where these one shot thermal cut-offs are used. Is there any supporting / contradicting evidence that you can provide?
3. With regard to the fact that mainly the amperage is the relevant factor for technical reliability of the application – is there any supporting / contradicting evidence that you can provide?
4. Are there any other arguments being relevant in the context of the evaluation of this request for exemption which are not raised in the questions above and that of importance?

Finally, please do not forget to provide **your contact details** (Name, Organisation, e-mail and phone number) so that Öko-Institut/Fraunhofer IZM can contact you in case there are questions concerning your contribution.