

Questionnaire Exemption Request No. 3

“Cadmium in phosphor coatings in image intensifiers for X-ray images”

Background

COCIR applies for an exemption for “Cadmium in phosphor coatings in image intensifiers for X-ray images”.

The applicant justifies the exemption request with the following technical, scientific and socioeconomic arguments:

- a) The main argument of the applicant is that cadmium is needed as constitute of the phosphors of image intensifiers in medical X-ray devices. The applicant argues that without cadmium, the application would either require higher x-ray doses (negative health impacts) or more costly and less robust digital detector systems, also using hazardous substances.
- b) The applicant states that many efforts have been undertaken by the industry to substitute cadmium in image intensifiers in medical X-ray devices, but states that no currently known substitute allows comparably low X-ray doses than image intensifiers using cadmium.
- c) The applicant also states that general substitutes for phosphor based image intensifiers are digital detectors systems. According to the applicant, these digital detector systems are at present significantly more costly and less robust for mobile applications.

For details, please check the applicant’s exemption request at <http://rohs.exemptions.oeko.info/index.php?id=110>. 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).

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 in line with the criteria in Art. 5 (1) (a) to support your statement.
2. Is there any supporting / contradicting evidence that you can provide with regard to the need for cadmium in phosphors?
3. Is there any supporting / contradicting evidence that you can provide with regard to the fact that substitutes would not allow such low x-ray doses?
4. Is there any supporting / contradicting evidence that you can provide with regard to the higher costs incurred by digital alternatives?
5. The applicant proposes a potential exemption to be valid until 31 December 2019 for new x-ray devices and an unlimited exemption for spare parts for devices placed on the EU market before 1 January 2020. This suggestion is based on the applicant's assumption that between 2017 and 2020, digital detector systems will achieve a quality- and price-level suitable for all applications in all EU-hospitals. Is there any supporting / contradicting evidence for this assumption that you can provide?
6. Do you consider any other aspects or details to be of importance, which have not yet been taken into account?

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.