

Questionnaire Exemption Request No. 4

“Lead acetate marker for use in stereotactic headframes for use with CT and MRI and in positioning systems for gamma beam and particle therapy equipment”

Background

COCIR applies for an exemption for “Lead acetate marker for use in stereotactic headframes for use with CT and MRI and in positioning systems for gamma beam and particle therapy equipment”.

The applicant puts forward the following main arguments:

1. The main argument of the applicant is that there are no existing alternative substances or designs that provide the characteristics of lead acetate as a marker for the precise location in medical equipment.
2. Furthermore the applicant states that several of the potential alternative heavy metals are more hazardous than lead and are therefore not suitable substitutes.

For details, please check the applicant’s exemption request at <http://rohs.exemptions.oeko.info/index.php?id=111>. 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 to support your statement.
2. Against the background that the applicant claims that there are no suitable substitutes – is there any supporting / contradicting evidence that you can provide? 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, etc.).

3. 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.