

Questionnaire Exemption Request No. 5

“Lead as an alloying element as a lubricant for bearings and wear surfaces in radiotherapy equipment and radiosurgery equipment and for patient and equipment support systems”

Background

COCIR applies for an exemption for “Lead as an alloying element as a lubricant for bearings and wear surfaces in radiotherapy equipment and radiosurgery equipment and for patient and equipment support systems”.

The applicant puts forward the following main argument:

1. The main argument of the applicant is that there are no existing alternative substances or designs that provide the characteristics for this specific application.

For details, please check the applicant’s exemption request at <http://rohs.exemptions.oeko.info/index.php?id=112>. 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. The applicant disclosed his assumptions for quantifying the total amount of lead used in the EU for dry bearings in medical devices. Is there any supporting / contradicting evidence that you can provide – especially regarding so called niche applications not enlisted specifically as well as the amount of lead which is used for the lead containing sections of radiation shielding?
3. The applicant provided in his request for exemption an analysis of possible alternatives, for each discussing the material specific properties. Is there any supporting / contradicting evidence that you can provide?

4. Against the background that the applicant states that there are no viable 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.).
5. 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.