

Questionnaire Exemption Request No. 6

“Lead to enable thermal compression process to make a vacuum tight connection between aluminium and steel for X-ray image intensifiers”

Background

COCIR applies for an exemption for “Lead to enable thermal compression process to make a vacuum tight connection between aluminium and steel for X-ray image intensifiers”.

The applicant puts forward the following main arguments.

- a) Image intensifiers need to be assembled from steel, glass and aluminium, which must be bonded with a material forming a durably vacuum-tight bond. Due to the thermal mismatch of these materials and due to the high temperatures the assembly is exposed to during manufacturing, only lead can form a reliable vacuum-sealing bond.
- b) Digital detectors are an alternative technology, which would not require the use of lead. They still have, however, certain technical constraints, and result in higher radiation doses for the patient in some examinations.
- c) Digital detector systems are still more expensive and would thus increase the treatment cost of patients. Digital detector systems are therefore too expensive for hospitals and thus limit their diagnostic capabilities endangering patients' health.

For details, please check the applicant's exemption request at <http://rohs.exemptions.oeko.info/index.php?id=113>. 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. Do you agree with the scope and the expiry date of the exemption as proposed by the applicant? Please suggest an alternative wording and expiry date, if appropriate, and explain your alternative proposal.
3. 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.