

Questionnaire Exemption Request No. 15

“Lead not exceeding 20% in bronze bearings and bushes in monitoring and control instruments (Category 9.)”

Background

Test and Measurement Coalition (TMC) applies for an exemption for “Lead not exceeding 20% in bronze bearings and bushes in monitoring and control instruments (Category 9.)”.

A related exemption was reviewed in 2008 resulting in its inclusion into Annex III of RoHS II (9(b)). The relevant excerpt of the final report is available on the project website at <http://rohs.exemptions.oeko.info/index.php?id=121>.

The applicant puts forward the following main argument:

1. The main argument of the applicant is that the long-term reliability of all alternatives has not been fully evaluated for all applications.

For details, please check the applicant’s exemption request at <http://rohs.exemptions.oeko.info/index.php?id=121>. 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 to Oeko s questions.docx](#)”, 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. 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 stated that it would not be possible to provide an exhaustive list of those applications, where lead-free bearings and bushes are not applicable, taking into account the specific parameters.
Is there any supporting / contradicting evidence that you can provide?
Could you contribute to an exhaustive list as mentioned above?
4. The applicant has not been able to provide data on the total annual amount of lead in bronze bearings and bushes in monitoring and control instruments in the EU. Could you provide own calculation or assumptions in order to determine at least the magnitude of the total amount?
5. As an example the applicant referred to high volume pumps for emergency cooling. Are there similar applications? Do they belong to monitoring and control instruments?
6. Against the background that the long-term reliability of all alternatives has not been fully evaluated for all applications. Is there any supporting / contradicting evidence that you can provide?
7. 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.