

Specific questions exemption 13

"Lead and cadmium in optical and filter glass"

The following specific questions should be answered in your stakeholder contribution if you support exemption 13 to be continued / amended / discontinued:

Note:

In the context of the previous evaluation in 2004, it was concluded that "most optical glass and optical filters do not require lead or cadmium" although for a small number of specific applications lead and cadmium were required since substitutes could not meet all necessary characteristics provided by lead and cadmium.

- 1. Please specify these small number of applications (differentiate between applications using optical glass and those using filter glass): which applications currently fall under the scope of the RoHS Directive? Please provide a comprehensive list with allocation to WEEE (Directive 2002/96/EC) categories. Which applications fall under category 8 & 9 of the WEEE Directive? Which applications are covered by exemption 5 ("lead in glass of cathode ray tubes, electronic components and fluorescent tubes")?
- 2. Which of the applications covered by exemption 13 are available as RoHS **compliant products** (i.e. without lead and cadmium) on the EU market? Which applications are currently not available as RoHS compliant products?
- 3. Are there different **technical characteristics** between optical and filter glass? If so, what are the different technical functionalities of lead and cadmium in these types of glasses?
- 4. Which are the technical characteristics related to the use of lead and cadmium that are essential for the **technical functionality** of applications / products related to exemption 13? List those applications named under point 1 for which substitution is technically not feasible and justify.
- 5. What has changed since the **last evaluation** in 2004? What is the current status of **R&D effort**s towards substitution of lead and cadmium in the different applications?
- 6. Are manufacturers still investigating alternatives?
 - a. If yes, please provide a **roadmap** or similar evidence showing until when they intend to replace lead in glass in the applications mentioned above.
 - b. If no, please explain and justify why no further research has been undertaken against the background that the RoHS Annex is subject to regular revisions.



7. Please state for applications name under point 1 the **amount of lead and cadmium** used per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 13 put on the EU market annually.