Oko-Institut e.V.

titut für angewandte titute for Applied Eco

IZM

## Specific questions exemption 9b

## "Lead in lead-bronze bearing shells and bushes"

The following specific questions should be answered in your stakeholder contribution if you support exemption 9b to be continued / amended / discontinued:

- In which applications / products falling under the scope of RoHS are lead-bronze bearing shells and bushes used? Please provide a comprehensive list also naming the corresponding WEEE (Directive 2002/96/EC) categories. Which applications fall under category 8 & 9 of the WEEE Directive?
- 2. A similar exemption under the ELV Directive (200/53/EC) has recently been evaluated (entry 4 Annex II). Results are available at <u>http://circa.europa.eu/Public/irc/env/elv/library?l=/stakeholder\_consultation/evaluation</u> <u>procedure/reports/final\_report&vm=detailed&sb=Title</u>. Which of the statements made for the use of such applications in automotive industry are also valid for RoHS relevant applications?
- 3. Following the results of the evaluation of exemption 4 in Annex II ELV Directive, substitutes seem to be available. Please specify for which applications listed under point 1 substitutes are technically feasible or unfeasible. What is the current status of R&D efforts towards substitution of lead in the different applications? Which are the technical characteristics related to the use of lead that are essential for technical functionality of applications / products related to exemption 9b?
- 4. Which of the applications covered by exemption 9b are available as RoHS **compliant products** (i.e. without lead) on the EU market? Which applications are currently not available as RoHS compliant products?
- 5. 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.
- 6. Please state for applications name under point 1 the **amount of lead** used per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 9b put on the EU market annually.
- 7. Assuming the current exemption will be given an **expiry date**, what date do you think is technologically feasible for industry?