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Comments from SE in the Stakeholder consultation on exemptions from the substance restrictions in electrical and electronic equipment (RoHS Directive)

Interested parties have been given the opportunity to comment on five new exemption requests under the RoHS II Directive (2011/65/EU). We thank the European Commission and the Öko-Institut for this opportunity. SE has the following comments and advice regarding four of the requested exemptions.

Exemption request 2013-1: "Lead as thermal stabilizer in Polyvinyl Chloride (PVC) used as base for substrates in amperometric, potentiometric and conductometric electrochemical sensors"

In our opinion, the exemption should be specified more clearly, to avoid that it may be applied to other uses than intended. We suggest that the specification should define the exemption to only include equipment for medical diagnosis of human blood.

Exemption request 2013-2: "Cadmium in color converting II-VI LEDs ($< 10 \mu\text{g Cd per mm}^2$ of light-emitting area) for use in solid state illumination or display systems"

The exemption applies to a use that was not available on the EU market when the previous exemption was approved. According to the description in the request for renewal of the exemption, the referred use is still not applied to any products on the EU market, why an exemption does not seem justified.

Exemption request 2013-4 "Mercury used in high speed rotating electrical connectors (slip ring) with electrical conduction paths that have sealed liquid mercury, molecularly bonded to the contacts"

In our opinion, the exemption should be specified more clearly, to avoid that it may be applied to other uses than intended. We suggest that the specification should define the exemption to only include medical device applications for intravascular ultrasound imaging.

Exemption request 2013-5 "Cadmium in light control materials used for display devices"

In our opinion, the exemption should be specified more clearly, to avoid that it may be applied to uses in other screens than intended. We suggest that the specification should include a clear technical description of the type of screen referred to in the request.

Best regards,

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