

1. Scope / wording and relevant category of the exemption request

The applicant has requested an exemption for “*Cadmium (CdSe and CdSeO3) in Chalnicon video camera tubes exposed to ionising radiation with a dose rate in excess of 100Gy/hour and a total dose in excess of 100KGy with a centre resolution greater than 450 TV Lines*”

a. Do you agree with the scope of the exemption as proposed by the applicant?

b. Please suggest an alternative wording and explain your proposal, if you do not agree with the proposed exemption wording.

c. The applicant has identified the following relevant categories (as of Annex III of RoHS Directive):

- IT and telecommunications equipment (category 3),
- consumer equipment (category 4),
- monitoring and control instruments including industrial monitoring and control instruments (category 9), and
- other EEE not covered by any of the categories above (category 11).

Do you agree with this assessment?

2. Environmental / health protection considerations

Do you have any comments with respect to the applicant’s assessment of environmental and health issues, including (but not limited to) environmental and health requirements as of the REACH Regulation? Please justify your answer.

3. Availability and reliability of substitutes

a. Please provide comments whether you deem elimination or substitution of the Cadmium used via design changes or materials and components which do not require any of the materials or substances listed in Annex II as scientifically or technically impracticable, taking into account the available statements of the applicant made in the application and in his response to BiPRO’s questionnaire (in particular, but not limited to, sections 6 and 7 of the application and sections 4.2 and 4.3 of the questionnaire).

b. Please provide comments regarding the question whether reliability of substitutes is ensured or not.

c. Are you aware about relevant research developments in this field?

d. Are you aware of manufacturers of video camera tubes fulfilling at least the requirements as defined in the exemption request of the applicant? Please indicate names of manufacturers.

4. Impacts of substitution

In case you are of the opinion that regarding the use of the restricted substance as of the application,

- substitution of the restricted substance is not impracticable, AND
- the reliability of substitutes is ensured

Please provide comments regarding the socio-economic impact of substitution as applicable. Please also comment on the question whether the total negative environmental, health and consumer safety impacts caused by substitution are likely to outweigh the total environmental, health and consumer safety benefits of exemption. Please feel invited to provide data regarding the total negative environmental, health and consumer safety impacts caused by substitution, as well as data regarding the total environmental, health and consumer safety benefits of exemption.

5. Any comments on potential adverse impacts on innovation in case of granting the exemption?