

JBCE comment on public consultation of "Cadmium in video cameras designed for use in environments exposed to ionising radiation" in Exemption request A-2016

Name and contact details

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Dear RoHS exemption evaluation team,

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JBCE would like to highlight that the mentioned products are “specifically designed” for use in nuclear facilities in systems which should be considered as “large-scale fixed installations”.

It is JBCE’s opinion that under these circumstances the conditions are being met of Article 2.4(c) of the RoHS Directive:

- (c) equipment which is specifically designed, and is to be installed, as part of another type of equipment that is excluded or does not fall within the scope of this Directive, which can fulfill its function only if it is part of that equipment, and which can be replaced only by the same specifically designed equipment

Based on the above JBCE considers “video cameras designed for use in environments exposed to ionising radiation” to be excluded from the RoHS Directive and as such there is no need for an exemption request.



[About JBCE]

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