

Questionnaire

Exemption 13 Annex II Directive 2000/53/EC

“Hexavalent chromium in absorption refrigerators in motor caravans”

Stakeholders are invited to clarify the following specific questions as detailed as possible. In your contribution, please state which question number you are referring to.

- 1) Please state whether you would support or reject to align the current wording in Annex II ELV Directive with the recommendation given for a new wording of the corresponding RoHS exemption, i.e. “Hexavalent chromium as an anti-corrosion agent of the carbon steel cooling system in absorption refrigerators up to 0,75 weight-% in the cooling solution except where the use of other cooling technologies is practicable (i.e. available on the market for the application in motor caravans) and does not lead to negative environmental, health and/or consumer safety impacts”. Also, support you statement with comprehensive evidence.
- 2) Please give detailed evidence on the suitability of alternative CrVI-free technologies (e.g. compressor-based, thermoelectric or solar-powered refrigerators) for the application in motor caravans. Are these technically suitable? What are their technical and environmental benefits and drawbacks compared to absorption refrigerators?
- 3) Please provide a roadmap stating when it will be possible to substitute CrVI in the cooling system of absorption refrigerators used in motorcaravans or give evidence on environmental drawbacks of substitution.
- 4) Please provide detailed figures on the current amount of CrVI used in the EU annually through absorption refrigerators in motor caravans. What is the environmental impact associated with the use of CrVI in this application?

Furthermore, the following general questions can be used to support the exemption or taken as a basis for requesting an amendment or the discontinuation of the exemption:

- What is the application in which the substance/compound is used for and what is its specific technical function?
- What is the specific (technical) function of the substance/compound in this application?
- Please justify why this application falls under the scope of the ELV Directive (e.g. is it a finished product? is it a fixed installation? What category of the WEEE Directive does it belong to?).

- What is the amount (in absolute number and in percentage by weight) of the substance/compound in: i) the homogeneous material¹, ii) the application and iii) total EU annually for relevant applications?

Documentation provided by stakeholders including replies to the questions above should take the following points into consideration:

- Please justify your contribution according to Article 4 (2) (b) (ii) ELV Directive, i.e.
 - Justification for exemption still given or not given anymore according to technical and scientific progress;
 - Substitution of concerned hazardous substances via materials and components not containing these is technically or scientifically either practicable or impracticable;
 - Elimination or substitution of concerned hazardous substances via design changes is technically or scientifically either practicable or impracticable.
- Please provide sound data/evidence on why substitution/elimination is either practicable or impracticable (e.g. what research has been done, what was the outcome, is there a timeline for possible substitutes, why is the substance and its function in the application indispensable or not, is there available economic data on the possible substitutes, where relevant, etc.).
- Please also indicate if feasible substitutes currently exist in an industrial and/or commercial scale for similar use.
- Please indicate the possibilities and/or the status for the development of substitutes and indicate if these substitutes were available by 1 July 2003 or at a later stage.
- Please indicate if any current restrictions apply to such substitutes. If yes, please quote the exact title of the appropriate legislation/regulation.
- Please indicate benefits/advantages and disadvantages of such substitutes.
- Please state whether there are overlapping issues with other relevant legislation such as e.g. the Energy-using Products (EuP) - EuP Directive (2005/32/EC) that should be taken into account..
- If a transition period between the publication of an amended exemption is needed or seems appropriate, please state how long this period should be for the specific application concerned.

Stakeholder contributions shall be clearly marked “NOT FOR PUBLICATION” if they are not be posted as comments on the consultation website (http://circa.europa.eu/Public/irc/env/elv_4/library).

¹ Please refer to the FAQ document on RoHS and WEEE Directives available at http://www.europa.eu.int/comm/environment/waste/weee_index.htm