

From: [REDACTED] (GROW)
To: [REDACTED]
Cc: [REDACTED]@gamboneconsulting.com
Subject: RE: COCIR - Follow up to the meeting on 17 June - Documentation on RoHS
Date: mardi 22 juin 2021 16:07:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear [REDACTED]
many thanks for your feedback which we will study carefully to get the lessons to be retained.
Happy to continue the discussion, at the latest after summer with Kristin
Kind regards
[REDACTED]

From: [REDACTED]@cocir.org>
Sent: Monday, June 21, 2021 10:11 AM
To: [REDACTED] (GROW) [REDACTED]@ec.europa.eu>
Cc: [REDACTED]@gamboneconsulting.com
Subject: COCIR - Follow up to the meeting on 17 June - Documentation on RoHS

Dear [REDACTED]

It was a pleasure discussing with you about the upcoming changes in the EU Chemical Policy and REACH. As you requested additional information on the RoHS Directive and the impacts and pitfalls for a sector like COCIR, I'm attaching to this email a couple of documents we submitted to the consultation on the review and the final report of ECORYS and RAMBOLL on the evaluation of the Directive (we contributed significantly).

<https://op.europa.eu/en/publication-detail/-/publication/5b807311-9d93-11eb-b85c-01aa75ed71a1/language-en#document-info>

Please note that while the RoHS Directive is not perfect, we believe it is a good one. The dynamics are solid and it can be considered quite efficient, despite improvements are possible. As we discussed, moving REACH towards a restriction based Regulation is an option we look forward.

On the other end we also believe it should be possible to develop an even more efficient system that could consider the proportionality of the measures for essential uses like the medical sector. While our commitment to remove substances of concern does not change, a less strict and impactful solution could be adopted for the use of very limited amounts of substances, for instance, as we discussed, 12g of Lead per year in ultrasound equipment or 50g of lead per year in bearings of x-ray tubes. As you know, these devices are essential for early detection and treatment of diseases such as cancer and therefore their availability on the market and continuous development of new technologies make a difference in peoples lives.

We would be happy to continue the discussion with you and the EC on such a topic.

Regarding the meeting with Ms Schreiber, we understand it might be postpone till after the summer. [REDACTED]
[REDACTED]
[REDACTED]

Best regards,



COCIR

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