

## Frequently Asked Questions RoHS for PbX Detectors

**As a manufacturer of lead salt detectors, our customers often contact us with questions about RoHS. What is the current situation?**

*Sven Schreiber:* As the name suggests, our detectors contain lead. Unfortunately, the lead content is just above the minimum threshold accepted, which is why they fall under the RoHS directive and would not actually be permitted in the EU. However, 1c in Annex IV provides explicit exemption for lead in infrared detectors.

**But this exemption is time restricted?**

Correct. An exemption is limited to seven years at a time. However, to complicate matters further, different time periods apply to the three differentiated areas of medical devices, in vitro diagnostics, and industrial applications. These can be found in Article 4, Paragraph 3.

**For medical devices, however, the exemption expired last year. What does that mean for our customers?**

As long as the European Commission does not publish a new regulation, the old exemptions will continue to apply. So, our customers are on the safe side.

**When can we expect a new regulation?**

In 2018, LASER COMPONENTS began working with customers to draft an application to the European Commission for an extension to the exemption. This was then submitted the following year, which was followed by the consultation period for stakeholders. The examining institute's final report is now available, which recommends the continuation of the exemption to the Commission for another seven years. However, due to the workload at the European Commission, experts do not expect publication before 2023.



Sven Schreiber coordinates industry activities on the new RoHS regulation.

**Will there be any changes?**

Yes. For one thing, the three materials from 1c – lead, cadmium, and mercury – will be treated separately in the future. For another, the timeframes for the three application areas of medical devices, in vitro diagnostics, and industrial applications have been synchronized.

**That sounds largely like a continuation of the exemptions. Were there any restrictions at all?**

The Commission had the availability of substitutes thoroughly reviewed. For example, for pyroelectric detectors based on lead zirconate titanate (PZT), a new exemption will only be granted for six years, along with a recommendation to switch to  $\text{LiTaO}_3$ . For our lead salt detectors, it has paid off that many of our customers have provided input and that we have been able to prove with the help of several examples that PbS and PbSe cannot be replaced in the applications. I would like to take this opportunity to thank them all once again.

**Where can I read more about this information?**

You can find the final report on <https://www.rohs.biois.eu/>

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