

**Contribution submitted per email by Ing. Luc Steegmans, Consultant to the European Sign Federation on 8.11.2017**

---

---

Dear Mrs. Yifaat Baron,

With great interest we have read the request for exemption for Annex III, 1(g) from Lighting Europe.

This request shows all the right reasons why the exemption for these single cap CCFLs should be granted:

- 1/ There is no valid alternative to the tiny bit of mercury in a tubular discharge lamp to produce such a quantity of light
- 2/ The light is omnidirectional
- 3/ The longevity is proven
- 4/ The unique shape and color of light cannot be met by so called led substitutes
- 5/ The quantity of mercury used by the industry has decreased dramatically over the last few decades
- 6/ These lamps are often installed under high ceilings that are difficult to reach, hence costly to service if the lifetime of substitutes would be shorter. Access and maintenance costs would increase dramatically.
- 7/ Existing electric circuitry would not allow led replacements, everything including external ballasts must be changed in case of another light source.
- 8/ Lamps are recycled to a very high degree, via various recycling programs often supported by governments.
- 9/ Most of those CCFL are installed by professional installers
- 10/ not granting an exemption would kill an industry and impose high costs to replace all those good working CCFL lamps.

Therefore we absolutely support the request of Lighting Europe and hope you will do so in your conclusion to the Commission, for a maximum period possible.

Having said that, all the above reasons are equally, if not more, valid for HLDT (Handmade Luminous Discharge Tubes).

Where single cap CCFLs are mass produced, HLDT are produced in nano-volumes compared to the above.

The total quantity of mercury brought on the market is linear to the volume of lamp production.

Using again the word 'cap' it therefore would be wise to put a monitored cap on the sales volume to put a cap on the volume of mercury used by the industry, per year.

HLDT, probably you remember exemption request 15 of 2013, have all the above reasons. That industry alike would widely benefit from an extension of the exemption, with a monitored cap on production volume as is already the case, together with a guaranteed recycling program.

Sincerely,

Ing.Luc Steegmans,  
Consultant to the European Sign Federation