



ÖKO Institut  
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Brussels, 8<sup>th</sup> February 2008

Dear Sir / Madam,

With regards to the study that you are conducting on the revision of Directive 2002/95/EC on the 'Restriction of the Use of certain Hazardous Substances in Electrical and Electronic Equipment' (RoHS Directive), we are pleased to inform you that the European Lamp Companies Federation (ELC) position is the following, as already expressed in our recent letter to the commission:

*The ELC appreciates substances covered in Article 4(1), are based on scientific facts, while taking the precautionary principle into account. However, we would like to emphasize the use of a life cycle approach for all industry sectors and not limit this approach when addressing electrical and electronic equipment. The ELC requests the Commission to employ the elements of Better Regulation and to link this Directive (2002/95/EC) with 76/769/EEC and in the future with 1907/2006/EC.*

Kind regards,

Gerald Strickland  
Secretary General