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Germany

By email to [rohs.exemptions@oeko.de](mailto:rohs.exemptions@oeko.de)

21 December, 2015

Dear Ms. Baron,

**Response to 2015 Consultation 3: Joint Revaluation of Two Requests for Exemption, First Reviewed in 2013-2014, Related to Cadmium Quantum Dot Applications**

ChemSec, the International Chemical Secretariat, is a non-profit organisation dedicated to working towards a toxic free environment. Since ChemSec was founded in 2002 we have become widely recognized among NGOs, governments, businesses and other stakeholders as an important actor with a unique expertise and focus on hazardous chemicals. We have during the years followed the development and implementation of the RoHS directive closely.

ChemSec do not support further exemption to cadmium-based quantum dots in lighting and display systems under RoHS. Cadmium cause serious illnesses and present a severe danger to the environment, throughout the production chain. Cadmium and other heavy metals in consumer products should therefore be restricted. This is even more necessary in cases where alternative technology is available. This exemption would discourage sustainable and responsible innovation and that would have a grave environmental effect, which can be avoided.

Some stakeholders may argue that one of the alternatives for Cadmium – Indium Phosphide – is a carcinogen and poses similar dangers to human health. While we at ChemSec have warned against the dangers of Indium Phosphide we believe that this should not be construed as support for Cadmium QD technology. There are available non-Indium Phosphide, Cadmium free alternatives to Cadmium QD technologies and we support their adoption in the EU market.

We also fully support the European Parliament's vote to reject the Delegated Act by the European Commission extending the use of toxic cadmium in televisions and other displays until July 2018.1 The European Parliament voted 618 to 33 to reject the Delegated Act because the members came to the conclusion that the European Commission's justifications for maintaining cadmium exemptions as "manifestly incorrect" since displays using Cadmium-free quantum dots are already widely available across Europe, while Cadmium-based displays had all been withdrawn from the market since 2014.

Yours sincerely,

*Frida Hök*  
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