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Yifaat Baron
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Germany

Brussels, 7 December 2015

By email to rohs.exemptions@oeko.de

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

Dear Ms. Baron,

The EEB is the largest federation of environmental citizens' organisations in Europe. It currently consists of over 150 member organisations in more than 30 countries (virtually all EU Member States plus some accession and neighbouring countries), including a growing number of European networks, and representing some 15 million individual members and supporters. The EEB was established in 1974 to provide a focal point for its members to monitor and respond to the emerging EU environment policy. It acts as a communication channel between its members and the EU institutions - the Commission, the European Parliament and Council. It closely coordinates EU-oriented activities with its members at the national level.

Following the implementation processes of EU chemicals policy both in the framework of the REACH and RoHS Directives, we would like to comment on the joint revaluation of the above mentioned two requests and emphasize that we as EEB cannot see any justification to further exempt cadmium-based quantum dots in lighting and display systems under RoHS. It is a known fact that Cadmium and other heavy metals may 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 clean alternative technology is available.

Finally, we fully supported 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using Cadmium-free quantum dots are already widely available across Europe, while Cadmium-based displays had all been withdrawn from the market since 2014.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,



Carsten Wachholz
EEB Resource use and EU Product Policy officer

¹ <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2015-0205+0+DOC+XML+V0//EN&language=EN>