

Oko-Institut e.V.
Yifaat Baron
P.O. Box 17 71
D-79017 Freiburg
Germany

21st 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

We are a London-based investment manager with assets under management of over £10bn. We invest globally and have extensive experience in investing in the technology sector. Given our experience and expertise, we wish to comment on the joint revaluation of the above requests for exemption of extension of use of Cadmium-based quantum dots in lighting and display systems.

We do not find merit in these Exemption requests, and believe they should be set aside given the current availability of safer alternative materials. Samsung produces Cadmium-free quantum dot displays for sale today and it would be disingenuous to suggest that there will not be more capacity and competition coming into this market in 2016.

We also wish to highlight the European Parliament vote that strongly opposed the proposed Exemptions 39(a) and 39(b) on 20th May 2015. This rejection should not be set aside lightly, as these exemptions relate directly to the use of Cadmium-based quantum dots in lighting and displays. We cannot see fault with the European Parliament's conclusion that the European Commission's justification for the Delegated Act was incorrect since Cadmium-free quantum dot TVs are demonstrably, and widely, available in the European market through major retail chains.

The Restriction on Hazardous Substances (RoHS) Directive seeks to protect human health and the environment. We do not need to reiterate the widely acknowledged health risks associated with Cadmium and other heavy metals; suffice to say that Directive 2011/65/EU (RoHS 2) explicitly restricts their use in electronic and electrical equipment. We therefore conclude that further exemptions are incompatible with the minimisation of potential future liabilities from exposure to Cadmium during manufacturing, consumer use (or misuse) and the recycling processes.

Manufacturers should respect the provisions of the RoHS Directive 2011/65/EU and avoid using Cadmium-based Quantum Dots. Further exemptions would reflect neither the broad, and expanding, availability of Cadmium-free displays nor attach sufficient merit to the sustainable and safer innovation that has already taken place in the industry. To reiterate: high-performance, Cadmium-free quantum dots are a consumer reality today.

Yours sincerely,

A handwritten signature in black ink, consisting of a large, stylized initial 'R' followed by a long, horizontal, slightly wavy line extending to the right.

Rob Manning
Investment Director