



January 8, 2016

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Submitted Via Email: c.gensch@oeko.de & rohs.exemptions@oeko.de

Re: Stakeholder consultation for RoHS exemption request 2013-2 regarding exemption 39 on the use of cadmium in LEDs

Dear Dr. Gensch,

The American Lighting Association (ALA) is a trade association representing over 3,000 members in the residential lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Many ALA members also export to the European market. Our member companies are manufacturers, manufacturers' representatives, retail lighting showrooms and lighting designers that have the expertise to educate and serve their customers. We are pleased to submit the following in support of maintaining the subject RoHS exemption.

Electric lighting has a profound impact on our lives and has helped shape the modern world. ALA manufacturers have been involved in every new lighting technology available to consumers and many have been involved for much of the history of electric lighting. Most recently, LED lighting technology has grown and we are in the midst of a transformational change in lighting for the home. ALA members have a deep understanding of the consumer experience and preferences, with respect to electric lighting. Also, ALA manufacturers are active participants in voluntary and regulatory efforts to reduce the energy consumption – and greenhouse gas emissions – associated with electric lighting.

LED lighting presents many advantages over previous technologies and one such achievement is the realization of greater energy efficiency goals. However, in these "early days," we recognize that maximum efficacy involves using highly engineered phosphor formulations with LED technology to achieve a balance in the unavoidable trade-off between luminous efficacy (i.e. lumens per watt) and such characteristics as color performance.

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The global focus on the efficacy of general service lamps has led many manufacturers to sacrifice some level of color performance to meet high luminous efficacy specifications. To meet consumer needs, however, the ALA believes that it is necessary for the global lighting industry to pay more attention to the quality of light, including color rendering, chromaticity, flicker and light distribution instead of continuing to focus solely on energy efficiency if more efficacious light sources are to be accepted and installed in residential lighting applications.

Newly developed materials including quantum dots with narrow emission spectra can fill the gaps in the LED spectrum, e.g. in the red wavelengths, without the sizeable efficiency losses associated with traditional phosphors. Quantum dots both with and without cadmium have been in development for lighting applications for several years and are poised for market introduction in consumer lighting products.

The ALA respectfully requests that the subject RoHS exemption be maintained to allow time for manufacturers to finalize designing these materials into their products, and to test the products to determine their advantages and disadvantages. Eliminating the exemption at this time would be detrimental to the years of research and development aimed at improving energy efficiency as well as the consumer experience.

Respectfully Submitted,



Eric Jacobson, CAE
President/CEO
American Lighting Association