

Contribution to the RoHS-Pack 28 Consultation, specifically Annex III, Exemption 4(f)-I

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Not for Publication

Subject: Contribution to the RoHS-Pack 28 consultation, specifically Annex III, Exemption 4(f)-I

General Comments

SPECTARIS welcomes the opportunity to contribute to the consultation for the incoming 28th pack of RoHS exemptions. We represent over 400 companies active in the hightech industry branches Optics, Photonics, analytical and Medical Technologies. Our member companies manufacture a wide array of complex products, some of which require hundreds of components falling under RoHS. For many of these products and applications there are no technically viable alternatives available at this time.

While SPECTARIS supports the goal of the RoHS Directive of further reducing the usage of hazardous materials to protect human health and the environment, we need to take some challenges into account. For some applications there are no viable alternatives available. The socio-economic impact for user groups and, in the case of analytical equipment, patients following a ban of products currently using III-4(f)-I would be immense. As such, we fully support all the exemption requests brought forward, especially the request for renewal of Exemption 4(f)-I of Annex III by LightingEurope.

Questionnaire

Do you agree with the arguments put forward by the applicant? Are there any additional reasons that support the requested extension of the exemption?

We agree with the arguments LightingEurope brought forward in their application. As one of the special purpose applications mentioned in the application we would like to add the usage of mercury in lamps in analytical equipment, such as UV/Vis spectrometers.

In your opinion, what reasons oppose the requested extension of the exemption?

None.

Does the grouping of applications proposed by the applicant

– [1] Entertainment,

– [2] Flight simulators, and

– [3] Projectors below 2000 ANSI lumen

make sense in your view, or do you have an alternative proposal that could appropriately limit the scope of the existing exemption?

In the context of the renewal application, the proposed grouping does make sense. However, as mentioned above, we would like the application group of analytical equipment to be considered as well.

Are you aware of any other applications in which these lamps are used?

Yes, as mentioned before, analytical equipment. For example, in UV/Vis spectrometers mercury vapour lamps are required in UV/Vis spectrometry to trace the wavelength back to the SI unit of length nm.

How would you rate the availability of LED lamps (replacement of lamps in existing installations and new installations) in the applications mentioned above?

We concur with the arguments of LightingEurope. While LED lamps might be available for a limited number of cases, they are not retrofit lamps and as such these lamps are no practical replacement. A redesign of the products in question or at least parts of them would be required, likely resulting in the additional use of substances falling under Annex II of the RoHS Directive.

Are there any other aspects that you believe should be taken into account when assessing this application? Please provide relevant documents and evidence.

Relating to the additional example given of the use in UV/Vis spectrometry, no suitable alternatives cover the range of wavelengths needed for usage in the ultraviolet spectrum or allow for a comparable resolution.

Type	Wavelength Range
Argon	696 – 1704 nm
Mercury Argon	253 – 1700 nm
Krypton	427 – 893 nm
Neon	540 – 754 nm
Xenon	916 – 1984 nm

Figure 1: Range of Mercury-Argon lamps in comparison with other elements.

Best regards,

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