



YOUR LETTER OF

YOUR REF

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ENCL(S)

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SUBJECT Belgian communication for the public consultation on the renewal of the ROHS exemptions on the Mercury containing lamps

This Belgian position targets primarily the CFL (Compact Fluorescent lamps) category of product and consist in recommendations for the Report to be prepared.

In reference to the obligation in the WEEE Directive 2012/19/EU to collect and recycle lamps, including CFL, we note the following in relation to the collection phase of the process: No specific obligation exist to achieve a total (100%) collect ratio of the CFL, therefore we think that the actual ratio of collect achieved by the European operators should be identified to evaluate the level of efficacy of the system in place. Indeed - even if significant efforts have been implemented by the operators - indications that below 50% of CFL lamps was achieved in 2014 in Belgium. We recommend thus a thorough evaluation of these rates around EU to evaluate the mercury lost (i.e. potentially emitted to the environment) and ensuing consequences.

We also would like the study to include considerations on the short and medium term fate of the mercury that is extracted from the lamps: since very few options remain for the re-use of the substance, we question the final use of the extracted mercury and the potential long-term environmental (and health via environment) impact from the continuation of the marketing of the CFL, in relation to their contents in mercury.

We recognize that alternative technologies to CFLs are already on the market. We would recommend an evaluation on the potential for substitution by these alternatives, including eventual data available on their possible limitations or deficiencies (including from a health perspective).