

Response To Öko-Institut

regarding the

1st Questionnaire Exemption No. 2(a)(1-5) (renewal request)

“Exemption for „ Mercury in double-capped linear fluorescent lamps for general lighting purposes not exceeding (per lamp):

“(1) Tri-band phosphor with normal lifetime and a tube diameter < 9 mm (e.g. T2): 5 mg”: 4 mg may be used after 31 December 2011

“(2) Tri-band phosphor with normal lifetime and a tube diameter ≥ 9 mm and ≤ 17 mm (e.g. T5): 5 mg”: 3 mg may be used after 31 December 2011

“(3) Tri-band phosphor with normal lifetime and a tube diameter > 17 mm and ≤ 28 mm (e.g. T8): 5 mg”: 3,5 mg may be used after 31 December 2011

“(4) Tri-band phosphor with normal lifetime and a tube diameter > 28 mm (e.g. T12): 5 mg”: 3,5 mg may be used after 31 December 2011 – renewal not requested

“(5) Tri-band phosphor with long lifetime (≥ 25 000 h): 8 mg”: 5 mg may be used after 31 December 2011 ”

Date of submission: September 15, 2015

Name and contact details

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THE VOICE OF THE LIGHTING INDUSTRY

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Abbreviations and Definitions

Hg Mercury

LEU LightingEurope

Background

The Oeko-Institut and Fraunhofer IZM have been appointed within a framework contract¹ for the evaluation of applications for the renewal of exemptions currently listed in Annexes III of the new RoHS Directive 2011/65/EU (RoHS 2) by the European Commission.¹

LightingEurope has submitted a request for the renewal of the above mentioned exemption, which has been subject to a first evaluation. The information you have referred has been reviewed and as a result we have identified that there is some information missing and have formulated a few questions to clarify some aspects concerning your request.

Questions

General Questions:

1. Information is provided in your applications clarifying the amount of T8 halophosphate lamps placed on the market between 2009 and 2013. There have been indications that such lamps have been phased-out.
 - a. Please clarify if such lamps are still placed on the market;

Answer of LightingEurope: T8 halophosphate lamps in the scope of the Commission Regulation (EC) No 245/2009² are phased out in EU28.

- b. If so, please clarify why halophosphate is understood to fall under the scope of Ex. 2(a) which deals with tri-band phosphor double-capped linear fluorescent lamps

Answer of LightingEurope: According the understanding of LightingEurope halophosphate lamps are not in the scope of Ex. 2(a). T8 halophosphate lamps have been phased out in EU28 due to Commission Regulation (EC) No 245/2009³ as far as falling in the scope.

2. Please estimate for Ex. 2 entries 1, 2, 3 and 5, what share of the lamps covered under each entry are used for private consumer uses and what share are used for commercial uses (office building, schools, industrial buildings, etc.).

Answer of LightingEurope: Detailed overviews as requested in question 2 for every exemption request issued by LightingEurope are not available. However some indication is provided in recent studies by [VITO & VHK study \(Task 24\)](#) in Table 3 (page 2-15) and Table 4 (page 2-16). The estimation there is 6.5 % residential. It can be noted that lamps in professional and residential use are technically the same.

¹ Contract is implemented through Framework Contract No. ENV.C.2/FRA/2011/0020 led by Eunomia

² COMMISSION REGULATION (EC) No 245/2009 of 18 March 2009 implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for fluorescent lamps without integrated ballast, for high intensity discharge lamps, and for ballasts and luminaires able to operate such lamps, and repealing Directive 2000/55/EC of the European Parliament and of the Council

³ COMMISSION REGULATION (EC) No 245/2009 of 18 March 2009 implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for fluorescent lamps without integrated ballast, for high intensity discharge lamps, and for ballasts and luminaires able to operate such lamps, and repealing Directive 2000/55/EC of the European Parliament and of the Council

⁴ Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements ('Lot 8/9/19'), Draft Interim Report, Task 2, Markets, Prepared by VHK, in cooperation with VITO and JeffCott Associates Date: 19 November 2014 ([Link](#))

3. You claim “*that based on recent studies LED luminaires so far do not reveal a clear general environmental benefit e.g. due to higher energy efficiency during the use phase*”. This statement is clarified to be based on a study comparing T8 fluorescent lamps and T8 LED alternatives, however the statement appears also beyond the context of T8 lamps, for example in the application for Ex. 2(a)(1) which covers T2 lamps. Furthermore, on page 6, to which you refer, the authors also write “*This Application Summary Report focuses specifically on the performance of bare lamps—that is, lamps photo-metered on their own, without a luminaire. This basic level of performance is how most products are compared to one another during specification. However, bare-lamp performance may not translate when the product is operated in a luminaire, and best practice would include evaluating the performance of lamp-luminaire combinations.*”
- a. Please clarify if your statement regarding the energy efficiency of LEDs
 - i. is relevant only for T8 LED replacements;
 - ii. is relevant to LEDs used as retrofit replacements / conversion replacements / rewired replacements / in specially designed T8 LED alternative luminaires;

Answer of LightingEurope: The statement provided in the exemption request can be valid for any situation where an existing conventional lamp is being replaced by an LED retrofit or conversion lamp (application), so for T2, T5 and T8.

The FL-luminaires have been designed and released for fluorescent lamps. A retrofit LED lamp has “to take” the light-distribution as given by the specific luminaire. The light distribution of specifically designed LED luminaires (with integrated LED modules) is usually optimized taking into account the purpose. However the effect on energy efficiency is limited if LED retrofit/conversion lamps are used, because the light distribution of them is different compared to fluorescent lamps. Hence it needs to be validated on a case by case basis.

Specific luminaires designed for the use of LED retrofit lamps (only) can be better adapted to the lamps light distribution, although the light distribution of LED lamps is differing in a certain range while FL always have 360°. LightingEurope estimates the market share of such luminaires to be low. For technical reasons only certain LED lamps will be usable, not all due to missing standardisation.

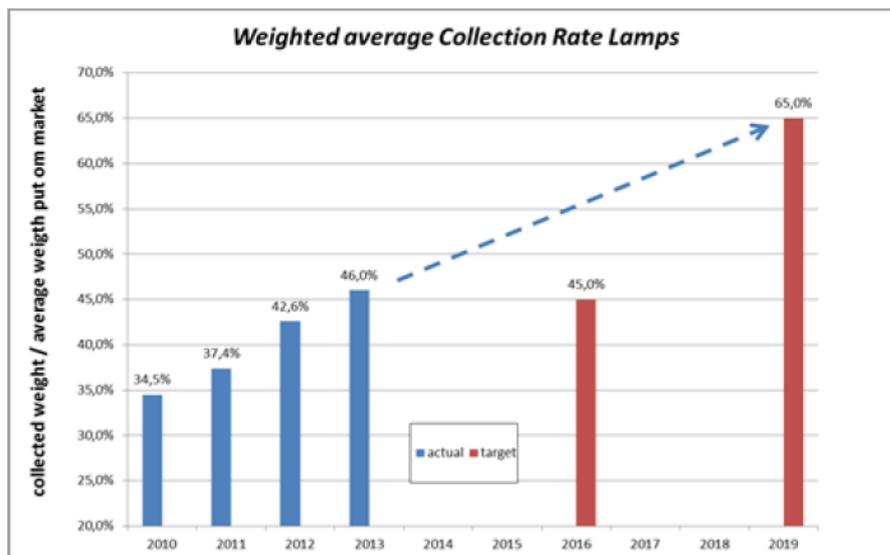
4. Please substantiate your statements with information and data allowing a comparison of performance of T2 / T5 / T8 linear fluorescent lamps with respective LED replacements in lamp-luminaire combinations.

Answer of LightingEurope: No further European studies than the ones referred to in the paper have been found on the subject. There is some benchmarking information in the Caliper studies of the DOE⁵. These lamps represent the market situation in the US and are less relevant in Europe. Luminaire types are different, leading to somewhat different impact on light distribution figures; also different control gear types are applied. It needs to be noted that limited replacement options are currently available (especially for T2 and T5 lamps), hence they do not justify the need to run a market study on those as the LED light sources design has not yet commoditized, so a variety of LED replacement solutions exists in the market presently.

⁵ DOE Department of Energy in the USA Link to caliper study: <http://energy.gov/eere/ssl/caliper-testing>

5. Information is provided regarding the total collection and recycling rates of lamps. Data is not specified regarding these rates for every lamp category (entries a-e of Ex. 1) on a quantifiable basis, though various estimations are provided regarding the amount of lamps placed on the market per year and how they are expected to decrease between now and 2020. Among others the following diagram is presented:

Figure 1: Weighted average Collection Rate Lamps (all lamps): 2010 – 2013 (blue) and targets 2016-2019 (red)



- a. Please explain what the denominator of estimated collection/recycling rates is, as it is clear that the number of lamps at end-of-life in a specific year is a result of lamps placed on the market in the past and their respective service-life.

Answer of LightingEurope: The WEEE recast directive (Directive 2012/19/EU)⁶ describes how the collection rate should be measured in Article 7: “The collection rate is to be based on the total weight of WEEE collected in accordance with Articles 5 and 6 in a given year in the member state concerned and expressed as *the percentage of the average weight of EEE placed on the market in the preceding three years in the member state*”. For example the data point from 2010 is based on data from 2007, 2008 and 2009.

- b. Please explain the discrepancies between these numbers and the numbers mentioned in the VITO & VHK⁷ report regarding collection rates, which provides data in Table 52 showing that the collecting rates of “lighting equipment except for discharge lamps” are around 5% whereas for “discharge lamps... *The fraction collected is around 30% for all years.*” If your data basis shows that higher collection rates are achieved for discharge lamps of various sorts, please support your argumentation with sufficient information as data.

⁶ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0019&from=EN>

⁷ Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements (‘Lot 8/9/19) Draft Interim Report, Task 3(revision 1), April.2015, VITO, VHK

Answer of LightingEurope: The report from the VITO & VHK study (Task 3⁸) was issued after the renewal requests were submitted to DG environment. The first percentage mentioned in the question (5%) refers to luminaires and does not apply to lamps. The explanation provided in the report below table 52 indicates that data are lacking and numbers used in the report are partly based on interpretation. LightingEurope numbers (which are the basis for the indicated graph) can be traced to the individual member countries in Europe and are followed over a long period.

Since 13th of August 2005 the European lamp industry has founded dedicated collection & recycling service organizations to fulfil the producer responsibility deriving from both EU and National legislation. Information on collection and recycling is available in the respective EU Member States. This can be presented at aggregated EU level. The underlying data can be supplied confidentially to Oeko-Institute since the individual data are the property of the individual CRSO's. Separate information per category at EU level cannot be provided as this is not being measured in all Member States. The collection organisations do not separate lamps according to RoHS relevant categories so no data are available at the level of exemptions.

6. It is explained that without the renewal of the exemption, installed linear fluorescent luminaires would need to be scrapped once a lamp malfunction is encountered, in cases where a suitable substitute is not available for retrofit/conversion/rewiring does. It is estimated that this would lead to large environmental impacts. Please clarify what materials and quantities are typically present in T2, T5 and T8 linear fluorescent luminaires.

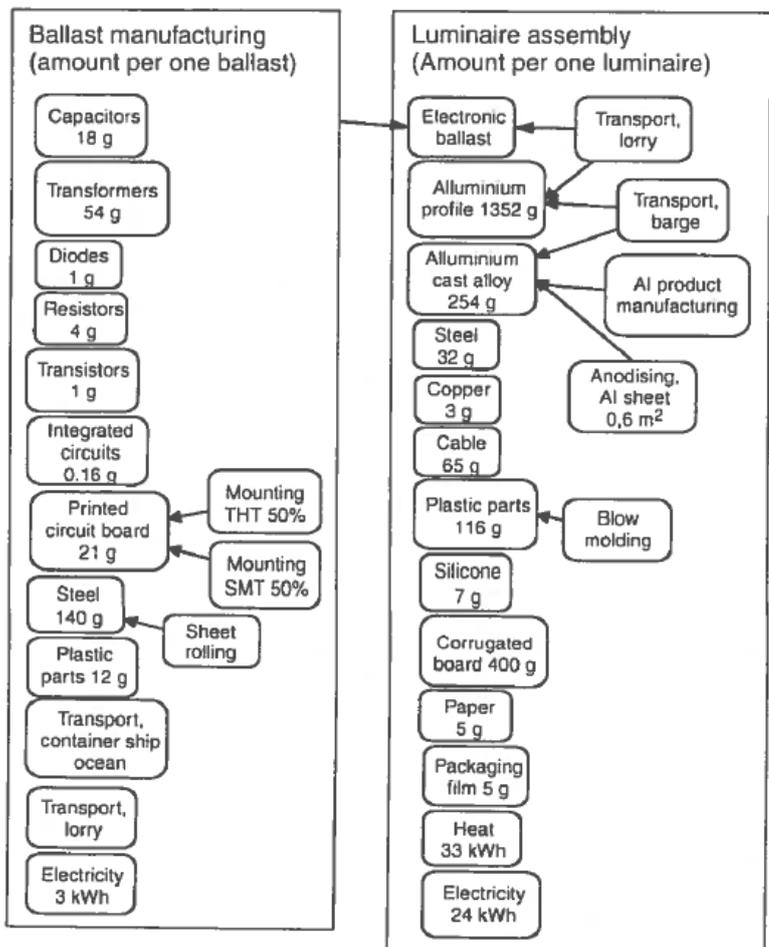
Answer of LightingEurope: In the luminaire the following materials and components are present: copper iron aluminium, electronic components, electrical wiring, and plastics. The amounts are reported in the following independent study "Life cycle assessment of a fluorescent lamp luminaire used in industry-a case study"⁹. A snapshot of the table with the materials is shown in Figure 2¹⁰. Overall the material difference per application is estimated to be low.

⁸ Ibidem

⁹ L. Tahkamo et al Lighting Res. Technol. 2014, Vol 46, page 453-464

¹⁰ Ibidem

Figure 2: Material composition of a Fluorescent luminaire



7. Please describe impacts expected should the requested exemption not be renewed:

- a. To what degree shall a replacement through LED lamps (retrofit/conversion/rewiring) take place over the coming 10 years? Alternatively, in what market share of the Luminaire Park shall a replacement of luminaires be required over the next 10 years?

Answer of LightingEurope: If conventional lamps are not allowed according RoHS Directive Art. 5 a customer has no other choice than to switch to LED, irrespectively of the route he chooses. However given the market variety with respect to installed applications, this transition period cannot be easily estimated. Change over time will depend on acceptance by the customer of the changes of the light quality in an existing FL luminaire (light output, maintenance, efficiency, etc.). A decision has to be taken case by case whether the required function is still given taking into account also the investment needed to change existing lamps and/or luminaires. Please also refer to answer on question 7b.

- b. Please provide a comprehensive description of the impacts to arise over the next 10 years, of a non-renewal scenario of the requested exemption, in terms of:
 - i. Total energy consumption;

Answer of LightingEurope: See also chapter 6.2.3 of the exemption renewal (for Ex2(a)(3)-T8 lamps). The lamps concerned in this exemption request are mainly for professional use (where certain application norms and requirements are in place), one – to – one replacement should not always be taken into account. As explained in the exemptions requests, change of a conventional application may require a new lighting plan adjusted to the need of the space, hence can influence the total energy use. The overall energy use will remain at a comparable level as today. Additionally it should be noted, that energy savings can be also achieved through smart solutions with conventional lighting, e.g. dimming, presence detection, daylight link, etc.)

ii. Environmental impacts;

Answer of LightingEurope: Please refer to the arguments used in the LightingEurope exemption requests clause 6.2.3.1: various LCA's show different results and are as such inconclusive regarding the comparison of LED technology versus conventional linear fluorescent technology on their total environmental impact. Non-renewal of this exemption will lead to unnecessary waste of luminaires that cannot be used, due to lack of a replacement lamps (premature refurbishment). Additionally the impact on the environment of the discarded luminaires can be found in the answer to question 5.

iii. Health and safety impacts;

Answer of LightingEurope: Please refer to the arguments used in the LightingEurope exemption requests clause 6.2.3.2. A single LED lamp replacement that can serve as a direct one-on-one replacement for all existing applications is not available at present. Hence there is a risk that unskilled person will try to make changes in an existing luminaire (e.g. rewiring). At present no standard for such changes in existing applications is available.

Please specify in each case the assumptions made and the data basis used to arrive at your estimations;

c. To what degree could better availability of information for consumers and users enable a decrease in the range of the difficulties described in relation to the retrofit and conversion routes, where changes to the luminaire are concerned?

Answer of LightingEurope: Technical boundaries or differences related to a lamp change from a conventional T8 to a LED tube, will not be solved through better marking and labelling of a product. Technical improvements to the LED retrofit lamps may solve some of the present issues, however it cannot be assessed if and when all issues will be covered. Changes of a luminaire is always recommended to be performed by professionals for safety reasons. The person doing the changes is responsible for the conformity of the installation with all applicable legal and safety requirements

8. It can be understood that there are various routes for replacing a linear fluorescent lamp, where LED alternatives are concerned – retrofitting, conversion, and rewiring as well as complete replacement of the luminaire. Various aspects are raised to explain why substitutes are not yet available or why retrofitting is not always possible (E.g. electrical compatibility; Applicable legal and compliance requirements different light distribution, etc.). In parallel, for some of the entries, the market share is declining, suggesting that alternatives are already applied in some cases, either through retrofitting/conversion/rewiring operations or through the replacement of luminaires.

Answer of LightingEurope: It should be noted that a declining market share (“market size”) for conventional linear fluorescent lamps can be a result of other trends in the market, e.g. longer lifetime and a transition towards HF drivers, less group replacements due to current economic situation, etc..

- a. Please specify for each entry in which lamp sub-groups substitutes can already been applied in relation to the various replacement routes named – in your answer please refer to each entry and to various lamp sub-groups that fall under the entry;

Answer of LightingEurope: Such detailed information is not available, hence cannot be provided. It needs to be noted that these questions ask for many variables, for which no market data are known (e.g. share of ECG drivers compatible LED tubes, ECG/CCG compatible lamps sales on the market, etc.). For some lamps like T2 and T5 hardly any LED lamp replacements are available on the market. Please refer also to comments made in the VITO & VHK studies (Task 4¹¹), chapter 5.5.4 (page 4-97). The different situation for the lamps falling in exemptions 2(a)(1), 2(a)(2), 2(a)(3) and 2(a)(5) are given in the renewal requests respectively.

- b. For each entry, please clarify for what share of applications retrofitting/conversion/re-wiring solutions are expected to continue to develop over the next 5-10 years and for what share it is expected that the shift to Hg free lamps shall only occur once luminaires are replaced with new installations.

Answer of LightingEurope: LightingEurope is not able to share the individual road maps the member companies have planned for their LED portfolio. There is no general roadmap to develop LED replacements for all existing linear fluorescent lamp types in the market. McKinsey indicates in its report¹² that by 2020 still 48% of total general lighting. Specific data per application is given, e.g. in Industry Lighting 75% and in Office Lighting 71% of the light sources will still be of conventional technology. Please refer also to comments made in the VITO & VHK report Task 4, chapter 5.5.4 (page 4-97¹³).

Question for Ex. 2(a)(1)

9. You provide estimations of the number of lamps placed on the EU-28 market in the last years for each of the exemption entries applied for:

¹¹ Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements (‘Lot 8/9/19’). Draft report, Task 4 Technologies, Prepared by VHK, in cooperation with VITO and JeffCott Associates
Date: 10 May 2015

¹² Lighting the way: Perspectives on the global lighting market – Second edition August 2012 by McKinsey & Company - Exhibit 27, page 52

¹³ Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements, Task 4

| Entry | 2009 | 2012 | 2013 | 2014 |
|---------------------------------------|---|----------------|-------------------------|-----------------------------------|
| Ex. 2(a)(1) (T2 lamps) | 400.000 lamps | | 250.000 – 300.000 lamps | |
| Ex. 2(a)(2) (T5 lamps) | 57 Mio lamps | 81 Mio lamps | 76 Mio lamps | |
| Ex. 2(a)(3) (T8 lamps Tri-band) | 175 Mio. Lamps | 261 Mio. lamps | 247 Mio lamps | |
| Ex. 2(a)(3) (T8 lamps Halophosphate) | 113 Mio. Lamps | 4 Mio. Lamps | 2 Mio. lamps | |
| Ex. 2(a)(5) (Long-life lamps, T5, T8) | Data understood to represent totals for T5 and T8 lamps of various service lives and not just long-life – please complete if specific data is available or can be estimated | | | <i>8 – 10 Mio T5 and T8 lamps</i> |

For each entry:

- a. Please provide an estimate for further changes in the trend of use of over the next 5-10 years – though exact data may be lacking, please at least provide a rough estimation;

Answer of LightingEurope: Please see [VITO & VHK study \(Task 2¹⁴\)](#) Table 56 (page 2-108). According this study McKinsey estimates a LFL (linear Fluorescent Lamps) turnover of 859 m€ for 2012, 736 m€ for 2016 and 493 m€ for 2020.

- b. For each entry and its sub-groups, please clarify what the respective luminaire-park is estimated to be at present, understood to be the basis for use of further lamps falling under each entry. In this respect, please also provide data on the average lifetime of such luminaries as well as on how long various shares of the luminaire-park range are expected to still be in service and whether luminaire types for Ex. 2 entries 1-5 are still sold on the EU market.

Answer of LightingEurope: Please see [VITO & VHK study \(Task 2¹⁵\)](#) Table 22 – 23 – 24, regarding installed park (with the split per residential and non-residential use) as well as Table 20 regarding estimated average lifetime of concerned lamps (for specifics with regards to long lifetime products please refer to respective exemption request). Lamps concerned in Ex (2) are still sold on the market with new luminaires (please note those are still allowed on the

¹⁴ Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements ('Lot 8/9/19'), Draft Interim Report, Task 2, Markets, Prepared by VHK, in cooperation with VITO and JeffCott Associates Date: 19 November 2014 ([Link](#))

¹⁵ *Ibidem*

market)¹⁶. Per McKinsey study in 2020 there will be still new installation sold with linear fluorescent lamps¹⁷ (global view).

- c. As the market share for such lamps is still quite high¹⁸ for T5 and T8 Tri-band (standard and long-life) falling under entries 2, 3 and 5, please explain what efforts industry is performing to achieve substitution or elimination of such lamps and provide a roadmap as to the future phase-out of such lamps, estimating the various stages of relevance and the time needed to complete each stage.

Answer of LightingEurope: See also answer of question 7b above. As described in detail in the renewal applications LightingEurope members have worked on the development of solutions replacing mercury in fluorescent lamps. No such solution was suitable as a replacement technology. For some of the lamp types LED retrofit solutions have been developed and are now on the market. It is only possible to develop solutions which are technically possible on the one side and accepted by the market on the other side. Therefore only for a small portion of lamp models on the market LED retrofit/conversion lamps are available. The biggest steps can be seen in the luminaire market, not in the lamp market. Most of linear fluorescent covered by exemption (2) are very efficient light sources, which as indicated in the original exemption request as well as in answers to the questions, and provide comparable benefits for the end-user vs their LED lamps replacements.

For entry Ex. 2(a)(2) (T5 lamps)

10. LEU states that “Due to the very wide range of applications LightingEurope believes that there is a market need for lamps covered by this exemption for more than 20 years.”
 - a. Please provide data as to the various market segments of luminaires relevant to this exemption entry and their average service life;

Answer of LightingEurope: Luminaire service lifetime can be estimated on different levels depending on an application, e.g. approximately 20 years for industry installations (example of Finland provided)¹⁹, 10-14 years for offices²⁰, 15-30 for outdoor²¹. Please note that lamp service life is significantly lower than 20 yrs. So during these 20 years the luminaire has had several lamp replacements²².

¹⁶ Please find some examples of luminaires with conventional lamps:

- (1) http://www.ecat.lighting.philips.nl//industrie/productieruimte/lichtlijnsystemen/maxos-tl-d-reflecto-runits-ip63/910605116526_eu/
- (2) http://www.ecat.lighting.philips.nl//armaturen-binnenverlichting/inbouwarmaturen/tbs165/910503652118_eu/

¹⁷ McKinsey, Lighting the way : Perspectives on the global lighting market, July 2011, Table 3, page 49

¹⁸ In comparison the long-life share are much smaller than the standard life, however as these lamps are interchangeable in relation to the luminaire a road map is requested for both categories.

¹⁹ L. Tahkamo et al Lighting Res. Technol. 2014, Vol 46, page 453-464

²⁰ McKinsey, Lighting the way : Perspectives on the global lighting market, July 2011, Table 2, page 48

²¹ Ibidem

²² Please refer also to comments made in the VITO & VHK study regarding service life time of a lamps, Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements ('Lot 8/9/19'), Task 2, page 28-29

- b. For each segment please clarify how the Luminaire Park is split between private consumer installations and commercial installations.

Answer of LightingEurope: Please see answers on questions 2 and 8b. Most of the lamps covered by Exs 2(a) are marketed to commercial and professional customers. Data about the luminaire split between private consumer installations and commercial customers are not available to LightingEurope. Roughly estimated clearly less than 5 % of the luminaires will be found in private households or similar buildings.

For entry Ex. 2(f) – long-life

11. It is explained that “According the Oeko-Institute Final Report “The Adaptation to scientific and technical progress under Directive 2002/95/EC” for the purpose of this exemption Long lifetime is defined as ≥ 25.000 h where the installed luminous flux (lamp survival in % times lamp luminous flux in % or service life) is higher than 80% at 25.000 hours with an electronic ballast using the standardised 3 hour cycle. This definition is different to the widely used average (=median) life time, which is defined as the average value of the life values of individual lamps operated under standardized conditions (50% failure). In other words, this is the operation time at which for a standardized 3-hour switching cycle (165 minutes on/15 minutes off in accordance with IEC 60081) 50 % of a sample population of lamps have failed.”

From the information you have provided, it appears that lamps benefiting from this exemption are only of the following types, where long-life follows the Oeko-Institute definition quoted above:

- T5 lamps with electronic control gear (ECG) and a lifetime of 30.000h.
 - T8 lamps with ECG and a lifetime up to 75.000h
- a. Please confirm if additional lamp types are manufactured that make use of this exemption entry;

Answer of LightingEurope: Yes, there is also a third category, meaning T8 Long Life lamps that can be operated with a conventional gear (CCG).

- b. Following the Oeko-Institute definition could the entry wording be narrowed as follows –
- “Tri-band phosphor with long lifetime (≥ 30.000 h) and a tube diameter ≥ 9 mm: 5 mg”
- If not please explain why and provide an alternative proposal limiting the exemption to the types of lamps for which it is currently in use.

Answer of LightingEurope: At present lifetime of T8 lamps has been standardised only for the use on a conventional control gear (magnetic ballast, IEC60081). A large variation on lifetime will exist depending on the operating conditions of the ECG driver (e.g. cold start versus warm start, see manufacturers’ product pages for reference). These lifetimes are usually significantly higher. Therefore, the preferred definition for lifetime of the lamps is the one according to IEC60081. This means lifetime evaluation for T8 lamps is recommended to be made for 50% point at a standardized 3-hours cycle on a CCG (not like suggested on ECG one). In that case for certain long-life lamp types the lifetime will be still below 30.000h. Hence proposal is to keep the defined lifetime target at ≥ 25.000 h. We recommend to reference EN60081 for the measurements of lifetime and lumen maintenance, which are the basis for the service life, in the wording of the exemption:

“Tri-band phosphor with long lifetime ($\geq 25.000h$ service life, EN60081) and a tube diameter ≥ 9 mm: 5 mg”

Please note that answers to these questions are to be published as part of the available information relevant for the stakeholder consultation to be carried out as part of the evaluation of this request. If your answers contain confidential information, please provide a version that can be made public along with a confidential version, in which proprietary information is clearly marked.