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European Commission
DG ENVIRONMENT
Unit ENV/A2 Waste Management & Recycling
Policy Officer RoHS
Mr. Hans-Christian Eberl

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Exemption Request for using of mercury in flourescent lamps

1. Name and contact details of applicant

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Company: NARVA Lichtquellen GmbH + Co. KG
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Name and contact details of responsible person for this application

Company: see above
Name: Christian Berndt
Function: Product Management
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2. Reason for application

Request for extension of existing exemption in

Annex III, 1	Mercury in single capped (compact) fluorescent lamps not exceeding (per burner):	
Annex III, 1 (a)	For general lighting purposes < 30 W:	2,5 mg
Annex III, 1 (b)	For general lighting purposes ≥ 30 W and < 50 W:	3,5 mg
Annex III, 1 (c)	For general lighting purposes ≥ 50 W and < 150 W:	5,0 mg
Annex III, 1 (d)	For general lighting purposes ≥ 150 W:	15.0 mg
Annex III, 1 (e)	For general lighting purposes with circular or square structural shape and tube diameter ≤ 17 mm	7,0 mg
Annex III, 1 (f)	For special purposes:	5,0 mg
Annex III, 2 (a)	Mercury in double-capped linear fluorescent lamps for general lighting purposes not exceeding (per lamp):	
Annex III, 2 (a) (1)	Tri-band phosphor with normal lifetime and a tube diameter < 9 mm (e.g. T2):	4,0 mg
Annex III, 2 (a) (2)	Tri-band phosphor with normal lifetime and a tube diameter ≥ 9 mm and ≤ 17 mm (e.g. T5):	3,0 mg
Annex III, 2 (a) (3)	Tri-band phosphor with normal lifetime and a tube diameter > 17 mm and ≤ 28 mm (e.g. T8):	3,5 mg
Annex III, 2 (a) (4)	Tri-band phosphor with normal lifetime and a tube diameter > 28 mm (e.g. T12):	3,5 mg
Annex III, 2 (a) (5)	Tri-band phosphor with long lifetime (≥ 25 000 h):	5,0 mg
Annex III, 2 (b)	Mercury in other fluorescent lamps not exceeding (per lamp):	
Annex III, 2 (b) (3)	Non-linear tri-band phosphor lamps with tube diameter > 17 mm (e.g. T9):	15,0 mg
Annex III, 4 (a)	Mercury in other low pressure discharge lamps (per lamp)	15,0 mg

3. Summary of the exemption request

Low pressure discharge lamps do not work without mercury

4. Technical description of the exemption request / revocation request

Mercury is used in single- and double-capped fluorescent lamps.
The relevant category of Annex II is - 5. Lighting equipment
The lamps are containing mercury.
Mercury is necessary for the discharge process.
Substitution of mercury in fluorescent lamps is scientifically impracticable.

5. Information on possible preparation for reuse or recycling of waste from EEE and on provisions for appropriate treatment of waste

In Germany exists a closed loop system for fluorescent lamps - LIGHTCYCLE
The article is collected and sent without dismantling for recycling.
The amount (weight) of RoHS substance present in EEE waste accumulates per annum for Germany may be asked by LIGHTCYCLE

6. Analysis of possible alternative substances

There are no alternative substances for using of mercury in fluorescent lamps

7. Proposed actions to develop possible substitutes

There are no alternative substances for using of mercury in fluorescent lamps

8. Justification according to Article 5 (1)(a)

Mercury is registered for using in fluorescent lamps

Brand-Erbisdorf, 19 December 2014



Dr. Olaf Hansen

Chief Operation Officer



Christian Berndt

Product Management