

Contribution from the Climate and Pollution Agency in Norway, submitted to RoHS Exemptions Stakeholder Consultation on 3 September 2012, concerning:

Exemption request 5 "Decorative ceramic lamp bases or other ceramic components of luminaires containing lead and/or cadmium in the glaze/colouring":

According to Article 5(1)(b) (2002/95/EC) any amendments which are necessary in order to adapt the Annex to scientific and technical progress for the following purposes shall be adopted: exempting materials and components of electrical and electronic equipment from Article 4(1) if their elimination or substitution via design changes or materials and components which do not require any of the materials or substances referred to therein is technically or scientifically impracticable, or where the negative environmental, health and/or consumer safety impacts caused by substitution are likely to outweigh the environmental, health and/or consumer safety benefits thereof;

We consider that the application not fulfils these criteria. It is **not** impracticable to change the lamp bases into other materials without lead and cadmium.

According to the application it is estimated that annual quantities of the hazardous substances used in these particular application is up to 5000 t/year for lead and 25 t/year for cadmium. In our perception this may have a significant impact on the waste stream and the environment. We therefore consider this may prevent the reuse of the ceramic.

The main consideration in this question must be the environmental aspects, not the aesthetical aspects. We therefore can't support this request.