

## **Questionnaire Exemption Request No. 20**

**“Mercury in cold cathode fluorescent lamps and external electrode fluorescent lamps (CCFL and EEFL) for special purposes not exceeding 5 mg per lamp in lighting applications for monitoring and control instruments (Category 9).”**

### **Background**

The Öko-Institut together with Fraunhofer IZM has been appointed for the technical assistance in reviewing the requests for exemptions from the requirements of the RoHS Directive 2011/85/EU (RoHS II) by the European Commission. You have submitted the above mentioned request for exemption which has been subject to a first completeness and understandability check.

As a result we have identified that there is some information missing and a few questions to clarify before we can proceed with the online consultation on your request. Therefore we kindly ask you to reformulate your request taking the following points into consideration.

### **Questions**

1. *You mention that CCFLs and EEFLs are primarily but not exclusively used in displays for backlighting purposes – which other uses exist? Please describe in technical detail.*

Detailed technical information of other uses is not available at that stage. The reason is that this exemption was presumed to be available for category 9 and therefore no detail assessment and investigation has been performed so far. Our supply chains are very complex as our products are made of thousands of parts and we deal with a substantial number of suppliers. For further details see General comments section 1 and section 2.2. 9 &10.

2. *You claim that the existing exemption 3(c) under which the application of CCFLs and EEFLs fall will expire on 31 December 2012. We could not find any evidence for this – please explain why you come to this conclusion. According to our knowledge exemption 3(c) would still be applicable to category 9 equipment after July 2014 and there would thus be no need for an exemption extension to 2021.*

The date in our original submission was incorrect and should have been 31 Dec 2011.

The lamps that we know are used as display backlights in our products are <500mm and so could utilize Exemption 3(a). However, while there is no limitation on use up until 31 Dec 2011, the limit changes to 3.5mg after this date. The original Exemptions 1 through 4 were applied almost equally across the supply chain for this situation. From data we have available relating to parts in use today, we would require a limitation of 5mg per lamp to avoid having to design and qualify the video interface as well as perform the part substitution.

The treatment of Exemptions currently published in Annex III, particularly the planned transitions of the exemption values defined for Exemptions 1 through 4, and how these will be applied to category 9 of products is not transparent, despite our common understanding that published exemptions will continue to be available as *published* until 2021.