

Brussels, 31th March 2008

Ms Stephanie Zangl
Öko-Institut e.V.
Merzhauser Str. 173
79100 Freiburg
Germany

RE: ELC submission to RoHS exemptions review

Dear Ms Zangl,

Hereby we would like to submit the European Lamp Companies Federation (ELC) contribution to the stakeholder consultation on adaptation to scientific and technical progress under Directive 2002/95/EC of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment for the purpose of a possible amendment of the Annex.

Our submission includes comments concerning the following exemptions: 1, 2, 3, 4, 5, 6, 7, 9a, 14, 15, 16, 17, 18, 19, 23, 24 and 26 (each exemption is attached in a separate file).

With kind regards,



Gerald Strickland
Secretary General

ELC submission to RoHS exemption #17

#	Question	Exemption #17
		Lead halide as radiant agent in High Intensity Discharge (HID) lamps used for professional reprography applications
1	Please state the amount of lead used in High Intensity Discharge (HID) lamps used for professional reprography applications, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 17 put on the EU market annually. What are the expectations about the future development?	The annual amount of lead in this application is still very low, less than 1 kg/yr, present as PbI ₂ , inside the discharge vessel of HID lamps for special applications. Number of lamps is below 100.000/yr, and has compared to 2003 dropped with about 50%, in line with the earlier projected decline of -10% per year.
2	Could you provide data and information on the current situation regarding substitution efforts? What has changed since the last evaluation? Are manufacturers still not investigating alternatives?	Due to the low amount of lead per lamp, the overall relatively small and decreasing number of products, the inability to substitute by another filling agent, no investigation has taken place to find substitutes.
3	Assuming the current exemption will be given an expiry date, what date do you think is technologically feasible for industry?	ELC requests a continuation of this exemption.