EUROPEAN LAMP COMPANIES FEDERATION

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

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ELC submission to RoHS exemption #19

#	Question	**Exemption #19**
		Lead with PbBiSn-Hg and PbInSn-Hg in specific compositions as main amalgam and with PbSn-Hg as auxiliary amalgam in very compact Energy Saving Lamps (ESL)
1	Please state the amount of lead used per application, the lead content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 19 put on the EU market annually. What are the expectations for the future development taking into account measures supporting the increased use of energy saving lamps.	The annual volume is up to 200 kg.
2	Please provide evidence that manufacturers have put effort in research on alternatives for lead. What are the alternatives to lead and which ones are (likely to be) used as substitutes? Are there any results about strengths and weaknesses expressed in results relating to (technical) performance criteria?	In the laboratory, amalgams without lead have been determined. Full scale implementation is planned for the upcoming 2 years.
3	Could you provide data and information on the current situation regarding substitution efforts? What has changed since the last evaluation?	R&D has led to the identification of suitable lead-free alternatives
4	Are manufacturers still investigating alternatives?	
4.a	If yes, please provide a roadmap or similar evidence showing until when they intend to replace lead in glass in the applications mentioned above.	See above.
4.b	If no, please explain and justify why no further research has been undertaken against the background that the RoHS Annex is subject to regular revisions.	
5	Assuming the current exemption will be given an expiry date, what date do you think is technologically feasible for industry?	18 months after publication