

Brussels, 31<sup>th</sup> 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 #26

#	Question	Exemption #26
		Lead oxide in the glass envelope of Black Light Blue (BLB) lamps
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 26 put on the EU market annually. Are there expectations about the future development and what are the determinants?	Approx. 50 tons per year.
2	According to the original applicant (ELCF) substantial technical progress had been achieved, which made it possible to decide on the technical feasibility in 2006. Could you provide data and information on current situation? What has changed since the last evaluation?	Substantial progress has been made leading to elimination by lead oxide in the glass envelope by one of the ELC member companies.
3	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 of these substitutes expressed in results relating to (technical) performance criteria?	See above.
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