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 #6

#	Question	**Exemption #6**
		Lead as an alloying element in steel containing up to 0,35 % lead by weight, aluminium containing up to 0,4 % lead by weight and as a copper alloy containing up to 4 % lead by weight
1	Which applications falling under the scope of the RoHS Directive use these leadcontaining metals? Please give a comprehensive list of applications or an appropriate grouping of applications.	Aluminium in lighting fixtures; brass contact pins of some flourescent lamps and halogen lamps, switch starters, ballasts; other comparable applications
2	What is the amount of lead in these applications? 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 6 put on the EU market annually.	Lead is brass contains up to ca 3,5 % wt, depending on application and required material processability; no data are available for ELC regarding amount of brass used in different products
3	The use of lead as an alloying element in steel, aluminium and copper up to a certain amount is not only exempted under the RoHS Directive, but also under the ELV Directive (Annex II). The exemption under the ELV Directive has just been evaluated. Results can be found in the final report at http://circa.europa.eu/Public/irc/env/elv/library?l=/stakeholder_consultation/evaluation_procedure/reports/final_report&vm=detailed&sb=Title. Please state which of the results and statements are also valid for applications falling under the scope of RoHS.	Specific applications do not fall under the scope of the ELV Directive
4	Which applications falling under the scope of the RoHS Directive using these kind of lead-containing metals have different / specific requirements compared to the use in automotive industry?	Specific applications do not fall under the scope of the ELV Directive, however if these product would be used in the automotive industry, same requirements exist as for the lighting industry
5	Use of lead as an alloying element in steel: do you support the conclusion given in the above-mentioned report that there currently is no substitute for this use of lead in steel? One particularity of the use in automotive applications was that steels used in the automotive industry go through a variety of machining operations. Thus, the overall performance of steels in the various machinability tests (chip form, tool life and wear, surface finish, tool force, hot workability, deep drilling, etc.) need to be considered. Is this also valid for RoHS related applications?	Lead as alloying element in steel is not relevant for lamp industry.
6	Use of lead as an alloying element in aluminium: do you support the conclusion given in the above-mentioned report that there should be no difference made between the intentional and unintentional use of lead in aluminium and that no substitutes are available for this use of lead in aluminium?	Substitution by lead-free copper-alloys is possible. However, the trend is towards applying aluminium (lower cost) and a lead-free alternative has not yet been demonstrated
7	Use of lead as an alloying element in copper: the following points remained open in the above-mentioned report. Please answer them in relation to applications falling under the scope of RoHS.	

ELC submission to RoHS exemption #6

7.a	Leaded copper alloys are still used in a wide range of RoHS applications. For some of the applications it is not comprehensible why a substitution to leadfree alternatives is not possible (not safety-relevant applications). Please explain / justify / list applications for which substitution is technically not feasible and applications for which substitution is indeed feasible.	This question should be answered by the manufacturer.
7.b	Furthermore, it was not possible to evaluate whether or not lead-free alternatives could substitute leaded copper alloys (at least in some applications), since no detailed data or documentation on test results on lead-free alternatives (e.g. “Ecobrass”) were provided. Please provide such data and information.	This question should be answered by the manufacturer.
7.c	Different statements regarding the maximum concentration value of lead in copper alloys were submitted: One stakeholder states that a reduction of the maximum concentration value from 4% to 3% lead by weight in copper alloys is principally possible whereas in another statement it is emphasised that the concentration value of 4% lead is still justified and necessary. Please state which statement you support and provide supporting documentation.	This question should be answered by the manufacturer.
8	Assuming the current exemption will be given an expiry date, what date do you think is technologically feasible for industry?	For the case of lead in copper alloys and for the case of lead in aluminium, no time can as yet be indicated, hence ELC request a continuation of the exemption.