

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 #9a

#	Question	Exemption #9a
		DecaBDE in polymeric applications
1	Please specify the applications in detail where DecaBDE is still used. Please provide data on energy density and thermal load for each of the specific polymeric applications. Please provide information on whether DecaBDE use has increased following the elimination of the other PBDEs.	Answer has to be given by component industry. Lamp industry is using components in electrical and electronical parts like control gears.
2	Please state the amount of DecaBDE used per application, the DecaBDE content in the homogeneous material, the annual production volume as well as the number of applications related to exemption 9a put on the EU market annually.	Answer has to be given by component industry.
3	Please provide detailed information about the specific function and related performance criteria of DecaBDE. Have product groups or product parts been identified where DecaBDE use is critical? What technical characteristics do substitutes need to fulfil as a minimum requirement?	If Component industry is able to provide components fulfilling our specifications, which are DecaBDE-free, lamp industry will use these products. There is no specific requirement from lamp industry to use DecaBDE.
4	Please provide evidence that manufacturers have put effort in research on alternatives for DecaBDE. What are the alternatives 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?	Answer has to be given by component industry.
5	Are manufacturers still investigating alternative designs, which would allow elimination of Deca-BDE?	Answer has to be given by component industry.
6	Are manufacturers still investigating alternatives for the various product groups and product parts?	
6a	If yes, please provide a roadmap or similar evidence showing until when they intend to replace DecaBDE in the applications mentioned above.	Answer has to be given by component industry.
6b	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.	Answer has to be given by component industry.
7	Assuming the current exemption will be given an expiry date, what date do you think is technologically feasible for industry?	Answer has to be given by component industry.