

Öko-Institut e.V. Institut für angewandte Ökologie Institute for Applied Ecology

Specific questions exemptions 1-4

Exemption 1: "Mercury in compact fluorescent lamps not exceeding 5 mg per lamp"

Exemption2: "Mercury in straight fluorescent lamps for general purposes not exceeding: halophosphate 10 mg, triphosphate with normal lifetime 5 mg, triphosphate with long lifetime 8 mg" Exemption 3: "Mercury in straight fluorescent lamps for special purposes"

Exemption 4: "Mercury in other lamps not specifically mentioned in this Annex"

The following specific questions should be answered in your stakeholder contribution if you support exemptions 1-4 to be continued / amended / discontinued:

- 1. Please specify the different **lamp types that use mercury**, including the technology used, the amount of mercury contained (also mercury per burning hour), the function of mercury in the lamp, the lifetime of the lamp and its energy consumption.
- 2. What is the total **amount of mercury** put on the market in the EU annually and currently in use for each of these different mercury-using lamp types?
- 3. For which of these lamp types is the use of **mercury avoidable** (e.g. through substitution of the substance itself or through use of other lamp technologies not containing mercury)? Where has a reduction of the amount of mercury or a full substitution already begun or been completed? Please describe alternatives in (technical) detail.
- 4. Please specify the **maximum amount of mercury** contained in each lamp type today and how it will decrease over time due to technological progress. Support your statement with appropriate documentation such as a roadmap or results of tests and research activities. What is the currently best available technology with regard to lowest mercury content in each lamp type?
- 5. Please provide appropriate information on the **benefits of the use of mercury** in lamps, compared to lamps not using mercury; especially with regard to energy savings and hence reduction of mercury emissions during electricity production.
- 6. Assuming that in the EU a **total phase-out of mercury** is possible for the use in lamps, please specify until when such a phase-out would be completed for which application.
- 7. Assuming that the existing exemptions do not anymore reflect the status of best available technologies and that an exemption for the use of mercury in lamps in future

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would only be limited to very specific cases, please provide a **wording proposal** (which may also include an expiry date for the exemption of a certain application).

8. Please provide an opinion on the recommendations for limits of mercury content included in the preparatory studies for **implementing measures** under the Ecodesign framework Directive (2005/32/EC, "EuP").