

Specific questions exemption 18

“Lead as activator in the fluorescent powder (1 % lead by weight or less) of discharge lamps when used as sun tanning lamps containing phosphors such as BSP ($\text{BaSi}_2\text{O}_5:\text{Pb}$) as well as when used as speciality lamps for diazo-printing reprography, lithography, insect traps, photochemical and curing processes containing phosphors such as SMS ($(\text{Sr},\text{Ba})_2\text{MgSi}_2\text{O}_7:\text{Pb}$)”

The following specific questions should be answered in your stakeholder contribution if you support exemption 18 to be continued / amended / discontinued:

1. Please indicate whether there are **other applications** in the scope of RoHS where these kind of discharge lamps are used. Is lead also used in the same function in these lamps?
2. Please state for both kind of lamps 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 18 put on the EU market annually.
3. Could you provide data and information on the **current situation** regarding substitution efforts? What has changed since the last evaluation?
4. 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?
5. Specify the typical **specific energy demand** of these kind of lamps and quantify the changes in energy efficiency when using lead-free substitutes?
6. Are manufacturers still **investigating alternatives**?
 - 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.
 - 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.
7. Assuming the current exemption will be given an **expiry date**, what date do you think is technologically feasible for industry?