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ELC position regarding the RoHS exemptions for mercury in HPMV lamps 4(d) and other Discharge Lamps for special purpose 4(f)

Since the publication of the Annex III of Directive 2011/65/EU (RoHS-2) some customers of projector lamps and short arc mercury vapour lamps, ask for accurate classification regarding exemptions 4(d) and 4(f).

The concerns have technical origin, as discussions are going on by some customers whether projector lamps also might be considered as high pressure mercury vapour lamps (HPMV), with a consequence that they would fall under the power of exemption 4(d), and being phased out as of 13 April 2015 without having any technical alternative.

According to ELC member companies, 4(d) covers HPMV lamps, which are used for general lighting purposes.

In contrary to this, exemption 4(f) covers a variety of special purpose high intensity discharge lamps. **These special purpose lamps are used among others in projectors** or in industrial processes like semiconductor production. Currently, and in the foreseeable future, there are no technical alternatives for these lamps.

Consequently, the high pressure projector lamps and short arc lamps are under 4(f), as they are special purpose discharge lamps. They are not HPMV lamps.

The statement of ELC is supported by the following documents and facts.

- 1) The implementing measure¹ of the Energy Related Products directive (ErP) allows the HPMV lamps, which are used for general lighting, only² until 13th April 2015. The same lamps and expiry date is included in RoHS exemption 4(d). These lamps were developed in the 1930s for general lighting, and have low efficacy and therefore are to be phased out by ErP- and ROHS-directive.
- 2) High intensity discharge (HID) lamps for special applications are not covered by ErP requirements (Commission regulation 245/2009) and also exempted in RoHS.

RoHS 2011/65/EU, exemption 4(d)

“Mercury in High Pressure Mercury (vapour) lamps (HPMV) - Expires on 13 April 2015”

RoHS 2011/65/EU, exemption 4(f)

“Mercury in other discharge lamps for special purposes not specifically mentioned in this Annex – no expiry date”

¹ Commission Regulation 245/2009 of 18 March 2009

² because of low efficacy reasons

- 3) Öko Institut recommended in its final report³ on RoHS exemption revision to grant general exemption to special lamps including projector lamps. (See chapter 4.5.10-4.5.12)

About the European Lamp Companies Federation (ELC)

For over 20 years the European Lamp Companies Federation (ELC), has represented the leading European lamp manufacturers. The ELC is dedicated to promoting efficient lighting practice for the benefit of the global environment, human comfort and the health and safety of consumers. More information about the ELC can be found at www.elcfed.org.

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³ Öko-Institut, Fraunhofer Institut, 20 February 2009, Final report, Adaptation to scientific and technical progress under Directive 2002/95/EC, Freiburg

⁴ Commission Decision, 2010/571/EU of 24 September 2010

⁵ Directive 2011/65/EU of 8 June 2011