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To our customers

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10. January 2024

EU Directive 2011/65/EU amended by delegated Directive (EU) 2015/863 on the Restriction of Use of Hazardous Substances in Electrical and Electronic Equipment

Dear Sir/Madam,

the EU Directive 2011/65/EU on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS), prohibits placing on the EU market electrical and electronic equipment (EEE), that contain more than the maximum permitted concentration levels of certain hazardous substances in homogenous materials. These substances, with the maximum permitted concentration levels indicated in brackets, are lead (0.1%), mercury (0.1%), cadmium (0.01%), hexavalent chromium (0.1%), polybrominated biphenyls (PBB) (0.1%), polybrominated diphenyl ethers (PBDE) (0.1%), bis(2-ethylhexyl) phthalate (DEHP) (0.1 %), butyl benzyl phthalate (BBP) (0.1 %), dibutyl phthalate (DBP) (0.1%) and diisobutyl phthalate (DIBP) (0.1 %).

Our specialized light sources such as gas discharge lamps, infrared emitters and LED lamps are in scope of RoHS II. Light sources from Excelitas Noblelight are in compliance with the RoHS Directive, although some contain RoHS relevant substances, see next paragraph. We declare RoHS conformity in the EU Declaration of Conformity and affix the CE mark to our products as it is stipulated in the RoHS Directive.

Presence of RoHS relevant substances

UV gas discharge lamps often contain mercury to generate an ultraviolet emission spectrum. The use of mercury in these special purpose lamps is covered by exemption 4(f)-IV of RoHS II (see Annex III of 2011/65/EU amended by (EU) 2022/279). Moreover, some of these UV gas discharge lamps additionally contain lead to get a specific emission spectrum. Lead halide lamps are intended only for use in professional reprography applications. The use of lead halide lamps for reprography applications is covered by exemption 17 in Annex III of 2011/65/EU.

Additionally, there are cases where lead is present in brass bases (up to 4% by weight) of some UV lamps, which is permitted due to exemption 6(c) of RoHS II. This information was passed down the supply chain as lead is also a substance of very high concern (SVHC) on the REACH candidate list for substances subject to authorisation (Article 33 of Regulation EC No. 1907/2006). You would therefore

receive information from us in the sales documentation (offer, confirmation of order) for UV lamps about the presence of lead in the base of the lamp you bought.

As a result, all special purpose lamps from Excelitas Noblelight are RoHS compliant. Please see below for more information about the time-limited nature of exemptions.

Time limit for exemptions¹

The application exemptions to Directive 2011/65/EU, which came into force on 21 July 2011, are limited in their validity, which means that the application exemptions listed in Annex III undergo a revision process at least every five years (see Article 5). The review dates so far were 21 July 2016 and 21 July 2021. Validity status and date of renewal request are shown in the table below.

| Exemption, Annex III | Start date | Preliminary end date | Renewal request | Validity status |
|----------------------|------------|-------------------------------|----------------------------------|---|
| 4f-IV | 22.07.2011 | 24.02.2027 ((EU) 2022/279) | To be submitted until 23.08.2025 | Valid |
| 6c | 22.07.2011 | (21.07.2021) | 03.01.2020 | Valid, requested for renewal, waiting for commission decision |
| 17 | 22.07.2019 | 21.07.2024 | - | No longer renewable |

We are participating amongst a consortium of lamp manufacturers to submit strong applications for renewal of the exemptions to the organisation appointed by the EU Commission to review all such applications and to make recommendations to the EU Commission.

Yours sincerely,



i.A. Katja Schollek
Head of Product Compliance

¹ Validity list of exemptions: https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive/implementation-rohs-directive_en