

22 July 2019

To our customers

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The Restriction of Hazardous Substances in Electrical and Electronic Equipment EU Directive 2011/65/EU from June 8th, 2011 (RoHS II)

Dear Sir/Madam,

The European Union (EU) Directive 2011/65/EU on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS II), prohibits placing on the EU market new electrical and electronic equipment (EEE) defined in the categories in Annex I of the Directive, that contain more than the maximum permitted concentration levels of certain hazardous substances in homogenous materials. These substances, with the maximum permitted concentration levels in homogenous materials 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 specialised light sources such as gas discharge lamps, infrared emitters and LED lamps are in scope of RoHS II. They fall into category 5, *Lighting equipment*, as listed in Annex I.

Substances added by us

The use of mercury to create the plasma in UV discharge lamps is covered by exemption 4(f) of RoHS II (see Annex III of 2011/65/EU). This exemption is for *mercury in other discharge lamps for special purposes not specifically mentioned*. Please see below for more information about the time-limited nature of exemptions.

Substances in components sourced from suppliers

We are reliant on suppliers providing us information about the presence of RoHS substances in the components that we source for our light sources. We actively request this information from suppliers and rely on them to provide us with accurate information.

We have received information about the presence of lead 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 up 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.

Other than mercury and lead mentioned above, we can state that to the best of our knowledge and based on the information that we receive from our suppliers, no other RoHS substances (cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE)), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP)) are present in our light sources.

We declare the RoHS conformity of our light sources in the EU Declaration of Conformity, as the RoHS Directive stipulates that the CE marking should be affixed to indicate conformity with the RoHS Directive for all products in scope of the Directive.

Time limit for exemptions

The application exemptions to Directive 2011/65/EU RoHS II, which came into force on 21 July 2011, are limited in their validity, which means that the RoHS II application exemptions listed in Annex III undergo a revision process at least every five years (see Article 5). The first review date was 21 July 2016. Most of the application packs for the exemptions were processed, which includes exemption 6(c), and this exemption was extended for another five years until 21 July 2021.

We were amongst a consortium of lamp manufacturers whose products are covered by exemption 4(f) who submitted a strong application for renewal of the exemption to the Oeko Institute, the organisation appointed by the EU Commission to review all such applications and to make recommendations to the EU Commission. In their report the Oeko-Institute recommended the extension of exemption 4(f) for another five years as the LED technology has not advanced sufficiently to cover all application areas of mercury-added UV lamps in the whole UV spectral range. To date the European Commission has not granted the extension. In the meantime, exemption 4(f) for mercury remains valid.

We assume that the extension of exemption 4(f) will be granted by the European Commission for another five years, back dated from 21 July 2016 until 21 July 2021. For this reason, we are currently preparing the application pack for the next review date of 21 July 2021.

Yours sincerely



Sue Fortunato-Esbach
Head of Product Compliance