

I head up the Territory sales business for OSRAM UK.

1. OSRAM UK has recently learned of the open public consultation for the renewal application for exemption 4f of the RoHS Directive 2011/65/EU (RoHS 2).
2. In terms of the current OSRAM lamp product range, if there was no exemption for the use of mercury within "Other Discharge Lamps for Special Purposes", and it became no longer permissible for OSRAM to manufacture, store, transport, and sell these products within the EU, for example, this would impact over 250 lamps, or approximately one-third of OSRAM's specialist lamp product range. The economic impact on the whole of OSRAM's specialist product division would be catastrophic and would undoubtedly have immediate and unhappy implications for regional personnel structures in OSRAM's European offices and significant job losses for OSRAM and OSRAM's customers and multiple end users.
3. I would politely request a continuation to the exemption for the use of mercury within "Other Discharge Lamps for Special Purposes", as Covered by Exemption 4 (f) of the RoHS Directive 2011/65/EU (RoHS 2) for a long period of time.
4. All the products that would be impacted are specialist discharge lamps and while Osram is committed to reducing the mercury within these lamps to the absolute minimum, mercury is needed for the actual discharge operation to take place, and for the lamp to work. Currently there is no alternative to the use of mercury - even when it is as little mercury as feasibly possible - to make these lamp successfully operate.
5. As much as OSRAM wishes and looks to remove all mercury from such lamps to reduce the impact on the environment, these lamps require mercury to function and operate. To the best of my knowledge there is currently no alternative or substitute.
6. Furthermore OSRAM UK has approximately 20 UK based direct account partner/stockists who in turn supply end-customers that use the special discharge lamps.

Answer provided as is by Emma Woolf on behalf of Osram on the 27th of May 2021.