

Consultation Questionnaire Exemption No. 4(f) of RoHS Annex III

Current wording of the exemption:

Mercury in other discharge lamps for special purposes not specifically mentioned in this Annex

Requested validity period: Maximum (5 years and 7 years (cat. 8 and 9) respectively)

POSITION OF Svenskt Vatten –The Swedish water and wastewater association

1. VDMA and LightningEurope **Error! Bookmark not defined.** requested the renewal of the above exemption for the maximum validity periods with the same scope and wording for all EEE of cat. 3 and 5 (VDMA) and cat. 1-10 (LEU).
 - a. Please let us know whether you support or disagree with the wording, scope and requested duration of the exemption. To support your views, please provide detailed technical argumentation / evidence in line with the criteria4 in Art. 5(1)(a).

Svenskt Vatten supports the wording, scope and requested duration of the exemption required by Lightning Europe and VDMA with regards to the usage of UV-discharge lamps for drinking water disinfection, UV-disinfection using mercury-vapor discharge lamps is used at 900 of approximately 1750 drinking water treatment plant in Sweden. More than 6 million people in Sweden are dependent of UV-disinfection fore safe drinking water.

2. Please provide information concerning possible substitutes or elimination possibilities at present or in the future so that the requested exemption could be restricted or revoked.
 - a. Please explain substitution and elimination possibilities and for which part of the applications in the scope of the requested exemption they are relevant.

According to information that Svenskt Vatten has received from suppliers of discharge lamps for UV-disinfection there are no alternatives for mercury-based lamps today. The development of mercury free lamps is assumed to take 5 – 10 years more.

3. Do you know of other manufacturers producing devices of comparable features and performance like the ones in the scope of this exemption request that do not depend on RoHS-restricted substances, or use smaller amounts of these substances compared to the applications in the scope of this exemption?

Svenskt Vatten has no knowledge about mercury free alternatives to discharge lamps for UV-disinfection.

4. As part of the evaluation, socio-economic impacts shall also be compiled and evaluated. For this purpose, if you have information on socioeconomic aspects, please provide details in respect of the following:

Svenskt Vatten cannot answer these questions.

5. Any additional information which you would like to provide?

Svenskt Vatten is in favour to establish an EU-wide mercury recycling strategy.

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