Questionnaire

Exemption 14a Annex II Directive 2000/53/EC

"Mercury in discharge lamps for headlight applications"

Stakeholders are invited to clarify the following specific questions as detailed as possible. In your contribution, please state which question number you are referring to.

1) To our current knowledge mercury-free Xenon headlight lamps exist (D3 and D4 type).
    a. If you want to support the use of this technology: please give evidence on the successful use in vehicles and justify why there is no technical hindrance to use it as substitute technology for mercury-containing headlight lamps before 2012 (currently foreseen expiry date). Also, give evidence on the environmental impact of both type of lamps (e.g. comparison of energy efficiency, lifetime and mercury content).
    b. If you want to support continuation of the exemption: please explain in detail why it should technically not be practicable to use these lamps as substitutes for mercury containing discharge lamps and give evidence on the environmental impact of both type of lamps (e.g. comparison of energy efficiency, lifetime and mercury content).
2) To our current knowledge LEDs have been developed for headlight applications.
    a. If you want to support the use of this technology: please give evidence on the successful use in vehicles and justify why there is no technical hindrance to use it as substitute technology for mercury-containing headlight lamps before 2012 (currently foreseen expiry date). Also, give evidence on the environmental impact of both type of lamps (e.g. comparison of energy efficiency, lifetime and mercury content).
    b. If you want to support continuation of the exemption: please explain in detail why it should technically not be practicable to use these lamps as substitutes for mercury containing discharge lamps and give evidence on the environmental impact of both type of lamps (e.g. comparison of energy efficiency, lifetime and mercury content).
3) If you want to support continuation of the exemption but can not deliver technical evidence: please provide a scientific proof that mercury containing headlight discharge lamps are environmentally advantageous compared to either conventional incandescent headlight lamps or mercury-free alternatives. To our current knowledge the gain in efficiency of the discharge lamp itself is outweighed by the high energy need of the ballast.

4) Please give exact figures on the mercury content of headlight lamps and state whether these are maximum or average values or whether they correspond to the dosing amount. Also, state according to which standard the mercury content has been measured.
5) Please submit detailed and comprehensive information on the recycling systems set up for mercury-containing headlight lamps, i.e. are mercury containing headlight lamps dismantled according to Annex I ELV Directive? If so, how are these lamps than further treated and what happens to the mercury contained in the lamps? If not, where does the mercury end up then?

Furthermore, the following general questions can be used to support the exemption or taken as a basis for requesting an amendment or the discontinuation of the exemption:

- What is the application in which the substance/compound is used for and what is its specific technical function?
- What is the specific (technical) function of the substance/compound in this application?
- Please justify why this application falls under the scope of the ELV Directive (e.g. is it a finished product? is it a fixed installation? What category of the WEEE Directive does it belong to?).
- What is the amount (in absolute number and in percentage by weight) of the substance/compound in: i) the homogeneous material[1], ii) the application and iii) total EU annually for relevant applications?

Documentation provided by stakeholders including replies to the questions above should take the following points into consideration:

- Please justify your contribution according to Article 4 (2) (b) (ii) ELV Directive, i.e.
  - Justification for exemption still given or not given anymore according to technical and scientific progress;
  - Substitution of concerned hazardous substances via materials and components not containing these is technically or scientifically either practicable or impracticable;
  - Elimination or substitution of concerned hazardous substances via design changes is technically or scientifically either practicable or impracticable.
- Please provide sound data/evidence on why substitution/elimination is either practicable or impracticable (e.g. what research has been done, what was the outcome, is there a timeline for possible substitutes, why is the substance and its

[1] Please refer to the FAQ document on RoHS and WEEE Directives available at http://www.europa.eu.int/comm/environment/waste/weee_index.htm

function in the application indispensable or not, is there available economic data on the possible substitutes, where relevant, etc.).

- Please also indicate if feasible substitutes currently exist in an industrial and/or commercial scale for similar use.
- Please indicate the possibilities and/or the status for the development of substitutes and indicate if these substitutes were available by 1 July 2003 or at a later stage.
- Please indicate if any current restrictions apply to such substitutes. If yes, please quote the exact title of the appropriate legislation/regulation.
- Please indicate benefits/advantages and disadvantages of such substitutes.
- Please state whether there are overlapping issues with other relevant legislation such as e.g. the Energy-using Products (EuP) - EuP Directive (2005/32/EC) that should be taken into account..
- If a transition period between the publication of an amended exemption is needed or seems appropriate, please state how long this period should be for the specific application concerned.

Stakeholder contributions shall be clearly marked "NOT FOR PUBLICATION" if they are not be posted as comments on the consultation website (http://circa.europa.eu/Public/irc/env/elv_4/library).