

12 July 2021

JBCE Feedback to the Public Consultation on RoHS exemption 4(f)

JBCE strongly believe that RoHS Directive has been successful in reaching the objective of reducing hazardous substances in EEE in the EU. As a cross-sector association with member companies operating in different industries and stages in the supply chain, JBCE welcomes the opportunity to provide our proposal of alternative wording for exemption 4(f)-IV of the European commission's draft delegated act.

1. Wording proposal of 4(f)-IV

We note that there is a discrepancy between what the draft delegated act proposes as wording for exemption 4(f)-IV (page 4, section 3) and what is stated in the draft delegated act Annex for the same sub-exemption:

- Draft delegated act wording: Mercury in lamps emitting light in the ultraviolet spectrum
- Draft delegated act Annex wording: Mercury in high pressure sodium vapour lamps emitting light in the ultraviolet spectrum

We are concerned with the wording proposed in the Annex, because to the best of our knowledge "high-pressure sodium vapour lamps emitting in the UV spectrum" in fact do not exist. To have this wording in the final RoHS Annex would therefore be technically incorrect and would not reflect the reality of the market. We ask the Commission to change the wording in the Annex by taking on board the wording for 4(f)-IV as written in the delegated act.

JBCE and its members support to promote for human health and environment in a realistic manner and on the basis of profound evaluation, and we remain at disposal of European Commission and stakeholders to offer our technical expertise on this exemption.

ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of about 90 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles and glass products.

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