

# LightingEurope Statement on RoHS lamp exemptions

## Key messages

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This document informs market stakeholders about the phase-out of mercury and lead-containing lamps in the EU, essentially set through the RoHS Directive<sup>1</sup> considering products placed on the EU market. It clarifies which RoHS exemptions have expired and which LightingEurope has or will pursue renewal for, emphasising the continued validity of existing exemptions during the renewal process. RoHS-compliant products are also allowed under the EU Mercury Regulation<sup>2</sup>, which is the implementation of the UN Minamata Treaty addressing additional restrictions for EU manufacturing, import and export of certain products.

## Lamp-specific RoHS exemptions

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**Ahead of 2025, LightingEurope had already applied for a new validity period for the following RoHS exemptions:**

- **RoHS exemption 5(b)** 'Lead (not intentionally added) in soda lime glass used in the glass tube of fluorescent tubes not exceeding 0,2 % by weight'.
- **RoHS exemption 18b / 34 Annex IV** Suntanning and medical lead activated phosphor lamps.
- **RoHS exemption 4(f)-I** 'Mercury in other discharge lamps for special purposes not specifically mentioned' - this includes (ultra) high-pressure mercury lamps used for projectors with an output of < 2000 ANSI lumen and used in certain entertainment applications.

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<sup>1</sup> The [EU RoHS Directive](#) (2011/65/EU) regulates the placing on the EU market of electrical and electronic equipment (EEE) that contains certain hazardous substances. The law prohibits the use of mercury in lamps unless used in an explicitly exempted application as listed in Annex III and Annex IV of the Directive. These exemptions are granted by the European Commission for a certain time period. However, the listed expiry dates are generally not considered final phase-out dates as these exemptions can be periodically renewed by submitting a renewal request of the exemption period. During the evaluation period of such a renewal request, the existing exemption remains valid - even beyond the listed expiry date. If a renewal request is not granted, the European Commission must still grant a transition period of 12-18 months to give time to the market for a final phase-out.

<sup>2</sup> The [EU Mercury Regulation](#) (EU 2017/857) implements the [United Nations Minamata Convention](#) and restricts the manufacture, export and import of certain mercury-added products, including certain lamps. These are listed in Annex II of the Regulation. This list was extended by the European Commission in October 2023 ([EU 2023/2049](#)) and new additional restrictions have been proposed by policy-makers [in early 2024](#). These agreed restrictions do not impact those lamps still allowed under the RoHS Directive. See the [2024 LightingEurope press release on the EU mercury regulation](#) for more information.

- **RoHS exemption 2(b)(4)-I** 'Mercury in other fluorescent lamps not exceeding per lamp: 15mg [Hg]. Lamps for other general lighting and special purposes - this includes lamps for curing, polymerisation, pest management, explosive atmospheres, colour matching, certain medical applications etc.

**LightingEurope applied in August 2025 for new validity periods of the following RoHS exemptions to request a prolongation of these exemptions after 24 February 2027. LightingEurope requested the maximum 5-year validity period for all exemptions listed below, except exemptions 4(c)-I-III, for which a 3-year renewal period has been requested.**

- **RoHS exemption 1(f)-I** 'Mercury in single capped (compact) fluorescent lamps not exceeding (per burner) for lamps designed to emit light in the ultraviolet spectrum: 5mg' (currently valid until 24 February 2027).
- **RoHS exemptions 2(b)(4)-II-III** 'Mercury in other fluorescent lamps not exceeding per lamp: II - lamps emitting mainly in the ultraviolet spectrum: 15 mg, III - Emergency lamps: 15mg' (currently valid until 24 February 2027).
- **RoHS exemption 4a-I** 'Mercury in low-pressure non-phosphor coated discharge lamps, where the application requires the main range of the lamp-spectral output to be in the ultraviolet spectrum: 15 mg (currently valid until 24 February 2027).
- **RoHS exemptions 4(c)-I-III** 'Mercury in other HPS lamps for general lighting purposes not exceeding (per burner): I –  $P \leq 155$  W: 20mg; II –  $155$  W <  $P \leq 405$  W: 25mg;  $P > 405$  W: 25mg' (currently valid until 24 February 2027).
- **RoHS exemption 4(e)** 'Mercury in metal halide lamps (MH)' (currently valid until 24 February 2027).
- **RoHS exemption 4(f)-II** 'Mercury in high pressure mercury vapour lamps used in projectors where an output > 2000 lumen ANSI is required' (currently valid until 24 February 2027).
- **RoHS exemption 4(f)-III** 'Mercury in high pressure sodium vapour lamps used for horticulture lighting' (currently valid until 24 February 2027).
- **RoHS exemption 4(f)-IV** 'Mercury in lamps emitting light in the ultraviolet spectrum' (currently valid until 24 February 2027).

**Please note:** The above-mentioned renewal requests will remain valid, also after the listed expiry dates, until the European Commission has taken a decision and published a new renewal or a phase-out with a transition period.

For the renewal requests of exemptions that are under review by the EU Commission but for which no new validity period has yet been decided by a new delegated directive and for which a current expiry date lies in the past, there is normally no need to submit a new renewal request, as these continue to be valid until the European Commission has decided on the renewal request (e.g. 5(b)). A submission may be required in exceptional cases, e.g. if new evidence affects the recommended scope.<sup>3</sup>

<sup>3</sup> For an advisory overview of the status of validity of all RoHS exemptions, you can refer to [validity and rolling plan](#) table being regularly updated by the European Commission as a documentation tool.

**LightingEurope has not applied for / will not apply for the following exemptions, which means that these thus expire(d) with no prolongation period after the indicated dates:**

- **RoHS exemption 1(f)-II** 'Mercury in single capped (compact) fluorescent lamps not exceeding (per burner): For special purposes: 5mg' – have expired on 24 February 2025.
- **RoHS exemption (2)(b)(3)** 'Non-linear tri-band phosphor lamps with tube diameter > 17 mm (e.g. T9): 15 mg' – have expired on 24 February 2025.
- **RoHS exemptions 3(a-c)** 'mercury in CCFL and EEFL for special purposes used in EEE placed on the market before 24.02.2022—all lengths' – have expired on 24 February 2025.
- **RoHS exemption 4(b)** 'Mercury in HPS lamps for general lighting purposes not exceeding (per burner) in lamps with improved colour rendering index Ra > 80: P ≤ 105 W: 16 mg' – have expired on 24 February 2027.

**Please note:** To ensure the continued availability of essential lighting components, LightingEurope supports the Umbrella Project group's effort to secure extensions for the lead RoHS exemptions under Pack 22, which includes critical applications covered by exemptions 7(a), 7(c), and 6. Additionally, LightingEurope cooperates with the Lighting Industry Association (LIA) in the United Kingdom, where five RoHS exemption requests have also been submitted for prolongation to the UK-DEFRA authorities in 2025 (similar to EU exemptions 1(f)-I, 2(b)(4)-II, 4a-I, 4(f)-II and 4(f)-IV).

## The special situation of spare parts

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Non-integrated lamps are specifically designed as replaceable spare parts for electrical and electronic equipment (EEE), such as luminaires, in accordance with RoHS Directive article 3-27 and 4-4f. As spare parts, they play a crucial role in maintaining the functionality of EEE luminaires, as they have a finite lifespan and require regular replacement when they cease functioning. By enabling the restoration of functionality, these lamps help extend the overall lifespan of the EEE, enhance its durability, and reduce unnecessary waste generation.

LightingEurope is aware of the difficulty of unambiguously classifying certain lamps in the category set out by the RoHS legislation. However, for lamp manufacturers, it is essential to have legal certainty regarding the possibility of putting products on the market, irrespective of the planned application. This is because manufacturers are not able to control the use of lamps in products falling in other categories, inside or outside the RoHS scope. In practice, most lamps are installed in buildings or outside for lighting applications (category 5), but some are used in other types of equipment that fall into all other RoHS categories.

# Contact

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## About LightingEurope

LightingEurope is the voice of the lighting industry, based in Brussels and representing 32 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 100,000 people and an annual turnover exceeding 20 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at [www.lightingeurope.org](http://www.lightingeurope.org).