



European Semiconductor Industry Association

Ms Sarah Nelen  
Head of Unit  
DG Environment  
Directorate B3 - Waste Management and Secondary Materials  
CC: Ms Karolina Zazvorkova

30/9/2019

### **Renewal of RoHS Directive Exemption 4F**

Dear Ms Nelen,

The European Semiconductor Industry Association (ESIA) requests that the European Commission renews the RoHS exemption 4f which covers all the lamps for special lighting purposes for the maximum validity period.

Lamps benefiting from this exemption are used in photolithography machines, the key process manufacturing step in the manufacture of semiconductors. These lamps are also integrated into complex machinery, many of which are in scope of RoHS and therefore require this exemption in order to ensure they can still be placed on the EU market and can continue to operate for their full-service life. There are no known substitutes for these lamps at present nor are they expected in the near future.

ESIA asks that the exemption is renewed for a maximum validity period of 5 years and for at least 2 years after the date of publication of the Commission decision, to allow the supply chain to prepare an application to again renew this exemption and submit this application within the 18-months prior to expiration deadline set out in the text of RoHS. The EU acknowledges Europe's semiconductor manufacturing industry as a strategic priority, the industry relies on continued access to these lamps to operate, innovate and compete on the global market.

The European Semiconductor industry remains concerned with the delays related to the renewal of this exemption. Non-renewal of the exemption will have a serious and disproportionate impact on semiconductor manufacturing in Europe and would mean photolithography machines would be become unusable. Thank you for the consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H. Abma', is written over a light blue horizontal line.

Hendrik Abma  
Director General

*ESIA is an Industry Association of:*

**EECA** : European Electronic Component Manufacturers' Association

Rue de la Duchesse 11/13, B-1150 Brussels

Tel: +32 2 290 36 60 · Fax: +32 2 290 36 65 · E-mail: [secretariat@eusemiconductors.eu](mailto:secretariat@eusemiconductors.eu) · Web: [www.eusemiconductors.eu](http://www.eusemiconductors.eu)

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