

LightingEurope Briefing Document: RoHS Pack 29 Public Consultation

Introduction

The European Commission has tasked the Oeko-Institut to carry out a technical and scientific assessment. Consequently, the public consultation under Pack 29 is now open, running from **29 May 2026 to 1 August 2026**. It covers the exemptions requested by LightingEurope in the August 2025 submissions and will remain open for **nine weeks**.

The consultation will directly inform the consultants' assessment and is primarily based on general questions rather than an in-depth technical evaluation. The review will decide whether several existing RoHS Annex III exemptions for mercury-containing lamps should be renewed or phased out.

In response, LightingEurope is working to raise awareness and coordinate industry efforts to support the renewal of requested RoHS exemptions. While LightingEurope has already provided its core technical input in the original dossiers, this stage remains important to reinforce key messages and ensure they are fully considered in the assessment process. If your business or network relies on these technologies, it is essential to participate in the ongoing public consultation and provide evidence-based data.

This is particularly important in light of the European Commission's policy approach, which prioritises replacement wherever feasible. Under this principle, exemptions are only maintained where stakeholders can clearly demonstrate that no reliable, safe, and technically or economically viable alternatives are available. In the absence of such evidence, exemptions are likely to expire, meaning that affected lamps would no longer be permitted on the EU market.

For this reason, even where technical arguments have already been submitted, reinforcing key messages can still play a role. To do so, coordinated input from stakeholders might ensure that market conditions are properly considered in the final assessment.

Exemptions under evaluation

The Pack 29 consultation focuses on specific lighting technologies for which suitable alternatives are not yet technically viable or socio-economically feasible. The main exemptions currently under review are:

Relevant Exemption	Description
Ex. 1(f)-I	Lamps emitting mainly light in the ultraviolet spectrum: 5 mg Hg
Ex. 2(b)(4)-II	Lamps emitting mainly light in the ultraviolet spectrum: 15 mg Hg
Ex. 2(b)(4)-III	Emergency lamps: 15 mg
Ex. 4(a)-I	Mercury in low-pressure non-phosphor-coated discharge lamps up to 15 mg Hg
Ex. 4(c)-I-III	Mercury in other High-Pressure Sodium (Vapour) Lamps (in 3 variants)
Ex. 4(f)-II	Mercury in high-pressure mercury vapour lamps (used in projectors)
Ex. 4(f)-III	Mercury in high-pressure mercury vapour lamps (used for horticulture lighting)
Ex. 4(f)-IV	Mercury ultraviolet lamps

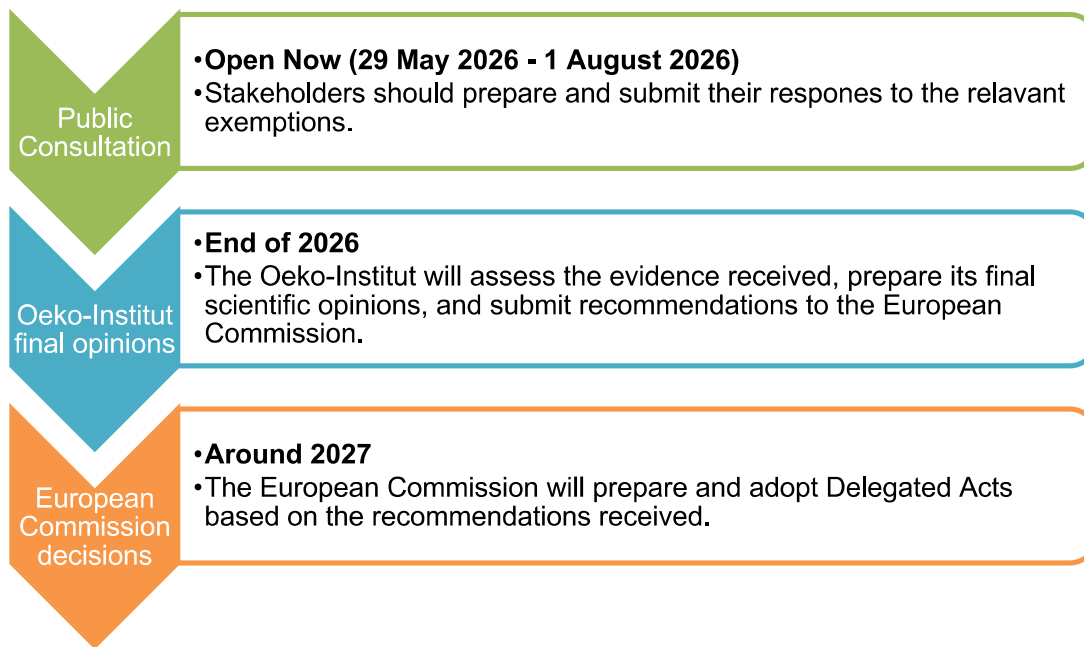
Please note that Request for **Exemption 4(e)** (metal halide lamps) still needs to be assessed.

The regulatory timeline

The evaluation and decision-making process follows a structured timeline. Stakeholders have **nine weeks** of time to submit their responses. Based on the typical duration of the process, it generally takes at least 18 months for the consultant to develop its opinion and for the European Commission to take a final decision. On this basis, a decision can be expected around **2027**, although this remains an indicative timeline.

Assuming a decision in mid-2027, two main outcomes are possible:

- **Renewal:** The exemption is renewed for five years, meaning it would remain valid until **2032**.
- **No renewal:** A transition period of approximately **12 to 18 months** is granted, after which the exemption would expire, likely between **mid-2028 and early 2029**.



How to respond to the consultation

There is **no single questionnaire** covering the entire consultation. Each exemption under review has its own dedicated questionnaire, designed to assess the specific technical characteristics of that exemption.

The list of exemptions can be found in the column on the left-hand side of [the consultation webpage](#). By clicking on the exemption, you will be able to download both our submission and the relevant questionnaire. Responses can then be submitted by email to rohs.exemptions@oeko.de.

A dedicated [guidance document](#) is also available on the consultation page. It provides all necessary information on how to complete and submit responses. We recommend participating in the consultation and providing relevant data to clearly demonstrate whether the exemption is still required for your products or applications.

Contact

For further information on this topic, please contact Antoine Hattemer, Policy Officer, through antoine.hattemer@lightingeurope.org or Utku Gülek, Consultant, through utku.gulek@lightingeurope.org.

About LightingEurope

LightingEurope is the voice of the lighting industry, based in Brussels and representing 31 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 80,000 people and an annual turnover exceeding 15 billion euros. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and well-being, 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.