

31 July 2020

Secretariat of the Minamata Convention on Mercury  
United Nations Environment Programme  
11-13, Chemin des Anémones  
1219 Châtelaine, Switzerland

Email: [MEA-MinamataSecretariat@un.org](mailto:MEA-MinamataSecretariat@un.org)

**Topic: European Market Study on Mercury-free Substitutes for Fluorescent Lighting**

Dear Secretariat,

I am writing to submit the attached report for consideration by the Ad hoc Working Group reviewing the exemptions in Annex A of the Minamata Convention. This report presents a new product database which shows the very high rate of compatibility (91 to 93%) of LED retrofit LED tubes into existing fluorescent ballasts in Europe. Furthermore, it documents over 5 metric tonnes of mercury savings that can be captured if CFLni, T5 and T8 fluorescent lamps were to be phased out in Europe under RoHS in 2021. Economically, the case for this phase-out is very strong, with payback periods as short as 4 to 5 months in certain applications and a cumulative net savings across Europe of €30 billion.<sup>1</sup>

We ask that you please share this report with the Parties to the Convention and the Ad hoc Group. Thank you for your support.

Yours sincerely,



Michael Scholand, LC  
Senior Advisor, CLASP

Cc: Peter Bennich, Ph.D., Swedish Energy Agency  
Eric Gibbs, Jenny Mandel, Marie Baton, CLASP

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<sup>1</sup> Update of the data provided by the analysis model developed in the course of the “Study to assess socio-economic impact of substitution of certain mercury-based lamps currently benefiting of RoHS2 exemptions in Annex III”; Oko-Institut e.V., Freiburg, 10.July 2020. [Link to report.](#)