

## Voluntary Industry Commitment to Limit Mercury Content in Self-Ballasted CFLs Sold in the U.S.

As a result of discussions between representatives of U.S. EPA, U.S. DOE, NRDC, and member companies of the Lamp Section of the National Electrical Manufacturers Association (NEMA), NEMA is initiating the following voluntary commitment program and is making it available for use by all CFL manufacturers (who sell or make available for sale in the United States) of self ballasted CFLs that agree to abide by the requirements of this program.

This commitment will be the basis for a future NEMA Standard:

### Background

Utilities, environmental groups, energy efficiency consortia, and other stakeholders have recently expressed concerns that CFL penetration could be negatively impacted due to the presence of mercury in CFLs. Since CFLs are an environmentally preferable product from a total mercury life cycle point of view, it is to industry's advantage to minimize this concern as a potential issue. The two key responses are then to:

- a) limit the total mercury content of CFLs, and
- b) ensure the CFLs are managed in an environmentally responsible manner at end of life.

This document provides an industry proposal to commit to a voluntary maximum per lamp mercury dose level.

### Requirements:

#### Product Scope:

Limited to Integral Self Ballasted CFLs (all base types: E26, GU24, etc.)

#### Maximum Dose Level: (Individual Lamp Basis)

Lamps that are rated with input wattages of 0 - <25 Watts:

**5 mg total mercury** (based on EU ROHS requirements)

Lamps that are rated with input wattages of 25 - <40 Watts:

**6 mg total mercury** (based on higher U.S. light levels/power levels and the slightly higher level of mercury needed to operate a lamp at these wattages)

Initial Implementation/Scope:

Applied to CFLs manufactured or imported after April 15, 2007 (to ensure manufacturers have sufficient time to manage their supply chains)

Conformance:

Conformance will be based on a voluntary manufacturer's declaration. It is expected that conformance will be maintained via a suitably controlled manufacturing process. A suitable process will also include periodic internal verification testing by the manufacturer and/or supplier (in the case of sourced lamps or amalgams or pellet doses). A manufacturer would apply a minimum 95% CL to the long term manufacturing control plan.

Manufacturer's Declaration:

NEMA will maintain a Web Site where CFL manufacturers can be listed as conforming to the voluntary declaration. To be listed, all products sold by the manufacturer must be covered- or if a product is not intended to comply *it must be listed by exception*. NEMA will assume no responsibility for conformance and will simply maintain the list of companies that state they comply (and a list of deviating models if any exist).

Listing for NEMA member companies will be free. Listing for non-NEMA members will be \$500 per year.

Manufacturers must resubmit their declarations by April 15<sup>th</sup> every year. Failure to submit will result in de-listing.

NEMA shall not be liable for any errors or omissions or misrepresentations by manufacturers nor any failure to list or de-list manufacturers.

Test and Sample Preparation Standard:

The total mercury content of the lamp will be measured by a new laboratory test method being developed by the IEC with input from NEMA members and others. It is expected that this work item will be accepted by IEC SC34A(PRESCO) and will be based on standardized sample preparation and a standardized wet chemical digestion process employing CVAA. When this standard is available it will be listed on this web site.

For more information on this progress of this measurement standard, please contact

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