

April 17, 2024

Kemtrak Mercury Free Statement



A mercury-vapor lamp is a gas-discharge lamp that uses an electric arc through vaporized mercury that produces short wave UV-C light^{1,2}. However, mercury is a chemical that is highly toxic to humans and the environment. When it is released into the environment, it enters the food chain where it accumulates mainly in fish. Exposure to high levels of mercury can cause harm to the brain, lungs, kidneys, immune and nervous systems³. Over the past twenty years, the EU has developed a comprehensive body of legislation covering all aspects of the mercury lifecycle, from primary mining to waste disposal. This includes measures on trade, products containing mercury, and mercury pollution.

EU law aims to ensure a high level of protection of human health and the environment from mercury, in line with the objectives of the European Green Deal⁴: the EU Chemicals Strategy on Sustainability⁵ and the Zero Pollution Action Plan⁶. Regulation (EU) 2017/852⁷ covers the full life cycle of mercury. It complements a large body of existing EU environmental law on mercury, by inter alia prohibiting the export of mercury and mercury compounds as well as the manufacture, export, and import of a large range of mercury-added products (MAPs).

The Commission has adopted the following Implementing Acts:

- Commission Decision on forms to be used in relation to the import of mercury⁸
- An Inventory⁹ of mercury-added products and manufacturing processes using mercury or mercury compounds is available in accordance with Art 8(7) of the Regulation. **This includes low-pressure UV lamps used in process analyzers.**

¹ <https://www.handlebar-online.com/articles/what-color-is-mercury-discharge-tube/>

² https://www.rp-photonics.com/mercury_vapor_lamps.html

³ <https://www.sciencedirect.com/topics/pharmacology-toxicology-and-pharmaceutical-science/mercury-vapor-lamp>

⁴ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

⁵ https://environment.ec.europa.eu/strategy/chemicals-strategy_en

⁶ https://environment.ec.europa.eu/strategy/zero-pollution-action-plan_en

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0852>

⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D2287>

⁹ <https://circabc.europa.eu/w/browse/b0a3ddc3-464e-4e57-9601-55a8315c529e>

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In July 2023 the Commission adopted the Delegated Regulation transposing the Minamata Convention into EU law¹⁰, which introduces a prohibition against the manufacture import and export of eight additional mercury containing products, **including mercury-containing lamps**. On 14 July 2023, the Commission proposed a revision¹¹ to target the last intentional remaining uses of mercury in a variety of products in the EU, in line with commitments set out in the EU's Zero Pollution Ambition. **The revision set out rules to prohibit the manufacture and export of six additional mercury containing lamps from 1 January 2026 and 1 January 2028 (depending on the lamp type).**

Kemtrak is the industry leader in high performance LED based industrial photometers and is at the forefront of the manufacture of mercury free process instrumentation with the flagship 007 platform that utilizes environmentally friendly mercury-free LED¹² light technology.

Kemtrak products comply with EU Directive 2002/95/EC (ROHS)¹³, 2011/65/EU (ROHS II)¹⁴, 2015/863/EU (ROHS III)¹⁵ and 2017/2012/EU (ROHS IV)¹⁶ for the Restriction of Hazardous Substances.

¹⁰ https://environment.ec.europa.eu/publications/prohibition-against-manufacture-import-and-export-eight-additional-mercury-containing-products_en

¹¹ https://environment.ec.europa.eu/publications/mercury-regulation-and-delegated-act_en

¹² [gc - mercury free microscopy white paper.pdf \(mygreenlab.org\)](https://www.mygreenlab.org/gc-mercury-free-microscopy-white-paper.pdf)

¹³ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:037:0019:0023:en:PDF>

¹⁴ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:174:0088:0110:en:PDF>

¹⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L0863&from=EN>

¹⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017L2102>

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