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Evaluation of exemptions under Directive 2011/65/EU

Hereby we strongly support a new exemption and the renewal of exemptions currently listed in Annexes III and IV of the RoHS Directive 2011/65/EU.

Further on we agree and support the VDMA and Lighting Europe objection referring to the same matter: a prolonging at least until 2026 and beyond.

Our statement:

We, the dissol GmbH, a medium sized enterprise, are manufacturer of UV low-pressure discharge lamps for disinfection as well as equipment surrounding the UVC disinfection market.

Our production / headquarter is situated in Germany, our sales office in Paris is serving the French speaking area.

In total dissol GmbH is employing approx. 15 people. Our annual sales in 2020 has been ~ 3.000.000 €

Approx. 80 % of our clients are situated in the EU. Our partners are engaged in the following industries / applications using UV low-pressure discharge lamps:

- Potable water supply (waterworks, private households)
- Wastewater treatment (sewage treatment plants, hospitals etc.)
- Air-disinfection (hospitals, ventilation systems, schools, offices, private building)
- Food-industry (greenhouse water management, fishponds, surface disinfection)
- Elimination of pesticides, medicine residues, antibiotics (AOP)

Talking about our clients that are situated in the EU approx. 1.500 – 2.500 employees are directly depending on our UVC Lamps.

For us a ban of mercury would result in the loss of our entire business. Most of our clients would face more or less the same situation.

To our point of view there is still no alternative available that entirely spoken would have a positive effect on our environment.

Having a more detailed look on for example the UVC LED-technology that in a first glance (with regard to mercury) seem to solve all problems we have to learn that:

- **Efficiency, CO2 footprint:**

=> The efficiency of UV low-pressure discharge lamps compared to UVC-LEDs is min 10 X higher

- **Life time:**

=> Life time of UV low-pressure discharge lamps compared to UVC LEDs is min 3-5 times higher

- **Service cost and operation costs**

=> Running costs of UVC LEDs compared to UV low-pressure discharge lamps are 30-50 times higher

- **Investment for new systems**

=> We have no real figures

- **Disposal and / or recycling of UVC-LEDs and units**

=> Waste / recycling of UV low-pressure discharge lamps compared to UVC-LEDs is significant easier to realise.

UVC-LEDs have their justification in smaller units e. g. point of use applications.

The usage of LED technology in bigger installations – to our knowledge – is still far away of being state of the art and competitive.

Other alternatives as for example chlorine having a “comeback” would run into other negative environmental effects and significant deterioration of e.g. the drinking-water quality.

Having in mind the worldwide increasing problems with regard to:

- Climate warming
- Lack of potable water especially in developing countries
- Demographic development / overpopulation
- Multi-resistant germs

As we see the situation: UV low-pressure discharge lamps will be without alternative for the next decades.



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CEO dissol GmbH