

To whom it may concern

EU consultation on the continued use of mercury-containing UV lamps

Dear Sirs,

PSC "Dniprowood" is a manufacturer of natural wood products located in Ukraine, Berdychiv with 270 employees.

Finished products: floors in various lengths, widths, thicknesses and a wide range of furniture.

We use UV lamps for the following purposes: Covering natural wood floors with various UV varnishes and oils.

The share of products based on UV polymerization in our total flooring production is about 50%

Our annual consumption of mercury lamps is 1pc

Number and type of mercury-based UV technology machines / devices: Barberan-1



Due to the lack of alternative technologies, we don't have experience with alternatives to UV lamps, but in case of a ban of mercury containing UV lamps the production of UV-cured floors will stop. Respectively stored UV materials, spare lamps and equipment totaling € 18,000 must be disposed of.

We / our clients are not in the position to estimate what amounts would need to be invested in alternative production because suitable new technologies are simply not developed at the moment.

We believe that the responsible authors of the pending mercury ban highly underestimate the global impact of the mercury ban on industries, products, markets and, finally, job opportunities and end-users.

The dramatic socio-economic impact of the mercury ban has nothing to do with the relatively small amount of mercury that actually reaches the market using mercury-containing gas discharge lamps. Used lamps can be recycled and the mercury contained in them can be reused in new lamps. If all market

participants actively use the possibilities of recycling, the mercury content of gas discharge lamps can be limited to closed-loop processes without compromising the environment and human health.

We would like to urge politicians to invest in a well-organized recycling system, including raising public awareness about the need for active participation in the recycling cycle. This is a win-win situation for all parties involved and the best outcome is having the best technology available for specific needs, and without prohibiting certain products, machines, technologies or markets “for the worse”.

Based on the above, we urge you to extend the Exemption to ban the production of lamps containing mercury until at least 2026. A short-term ban for mercury lamps will otherwise lead PSC “Dniprowood” to a loss of certain products, turn-over and work places.

Yours faithfully

Chief engineer of PSC “Dniprowood”

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