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To whom it may concern

Sinalunga, 26/05/2021

EU consultation on the continued use of mercury-containing uv lamps
Feedback on exemption request for elongation of RoHS 4(f) from VDMA and Lighting Europe

Company Makor srl with headquarters in Sinalunga (Tuscany-Italy) is an internationally known manufacturer of a wide range of technologically advanced wood finishing machines, equipment and solutions. We employ about 100 people.

Makor produces both single machines and complete production lines for finishing a huge variety of profiles and frames made of wood, MDF, glass, plastic, metal, chipboard, coated elements, and others. We supply the major production companies of the furniture and the building industry worldwide and export about 90% of the entire production.

For environmental reasons, UV-curing lacquers are increasingly used in substitution of solvent-based lacquers, with the advantage of reducing substantially the VOC emissions during production processes.

Mercury-containing medium-pressure UV lamps are installed in our UV curing lines to cure and harden water-soluble, solvent-based and 100% UV varnishes in order to obtain a scratch-resistant, resilient surface, which is required in many industrial areas and in consumer products. We supply every year several hundreds of UV lamps as original spareparts to our customers worldwide, contributing to keep their production processes running smoothly.

According to our experience, replacement of existing UV Lamp Systems with potential alternatives such as UV LED is either not feasible from a technical point of view or leads to a number of problems including quality issues, process downtime, productivity decrease, high investment costs, higher overall operational costs.

With respect to varnishes, replacement technologies based on LEDs can usually not provide the same degree of surface hardness, scratch resistance and product durability (automobile industry, wood industry). In addition to that, especially in the wood finishing field, the use of UV LED is still very limited due to the technical limitations and the noticeably higher costs of this technology compared to conventional UV.

We are convinced that a potential short-term mercury ban would have an extremely negative impact on several market segments in general and on the European industries in particular. A ban of UV lamps would put the majority of our customers in an extremely difficult situation, some of them with existential risk for their activity.

If UV lamps wouldn't be available anymore, our customers would be forced either to dismantle their machinery with the related amount of additional waste (machines, equipment and consumable that need to be decommissioned), or to face heavy investment costs to upgrade – where technically possibly – the machines with alternatives such as UV LED. Considering that UV LED does not cover all application properties required by the industry, a direct replacement (exchanging only the lamp) is in most cases technologically not possible.

Makor as an OEM would not be able anymore to supply original spareparts to its customers. Many of our machines out in the fields would become unusable. A considerable part of our own sparepart business would break off.

Furthermore, a Mercury ban would force Makor and many of our customers to abandon established processes with the definite risk of losing numerous work places worldwide.

We urge the policy makers to focus on a functioning recycling system including increasing public awareness on the necessity of actively participating in the recycling loop instead of banning a substance from the market that is indispensable for so many industrial areas.

Best regards

makor s.r.l.

Simone Ceccuzzi
CEO