



Progress beyond

Bollate, May 21st 2021

RE: Consultation Questionnaire Exemption No. 4(f) of RoHS Annex III

Solvay Specialty Polymers (SPP) is a global manufacturer of high-performance Specialty Polymers. We have over 1500 different formulations available for our customers to develop applications for their industry. We supply our polymers into a wide array of industries including, but not limited to Aerospace, Automotive, Batteries, Electronics, Healthcare, etc.

Solvay uses high pressure Hg lamps to perform an industrial photochemical process for the manufacture of perfluoropolyethers (PFPEs) which needs high power density in the UV-C wavelengths range. The lamps used in the photochemical process for the manufacture of PFPEs, at the end of their life are sent back to the lamp supplier.

As of today we do not see technical alternatives to Hg lamps: other UV sources, such as LED, with similar emission and power density are not available and far to be developed. Alternative processes for the manufacture of Solvay PFPEs which avoid the use of UV light have been thoroughly investigated for years but proved to be non-applicable for several reasons, including in particular process safety.

Solvay PFPEs produced by the photochemical process are unique products, which support a significant business and many direct employees. Owing to their unique properties, PFPEs are used in several strategic industrial clusters, such as Aerospace, Automotive, Electronic industries where the substitution of these materials is very difficult or even impossible. Hence, should the UV Hg lamps exemption not be renewed, Solvay PFPEs could not be manufactured anymore and this would result in a broader socioeconomic impact also negatively affecting the industry sectors we serve with our products.

In light of the above, Solvay supports the wording of the request to extend the exemption until 2026 and beyond.

Sincerely,

Fabio Riganti
Solvay Specialty Polymers
Head of Radical Polymers Product & Asset Management