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The European Commission

To whom it may concern

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May 27, 2021 Datum

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

Dear Sir or Madam,

Regarding the Consultation Questionnaire Exemption No. 4(f) of RoHS Annex III please find here our statement.

Pfleiderer Company is a manufacturer of wood based panels with several plants in Germany and Poland.

Just a few years ago we installed in our plant Leutkirch a brand-new lacquering line to produce lacquered boards of a very high quality.

To produce these high quality products we are applying the latest technology using UV lamps.

It took some time to optimize the system because lacquering is a very sensible area.

We use UV lamps to cure the lacquer and without UV lamps it would be not possible to produce again these products.

Depending on the special product we have to change the UV lamps all 3 – 4 months and therefore we have more than 10 UV lamps with costs of several 100 €/lamp.

Because of the fact that this is a very recent development in our company we have no experience if there would be substitutes for these UV lamps, but from what we know these kind of lamps are absolutely necessary to produce the quality which we require.

A complete switch to different lacquer systems would be not possible with the existing coating lines and additionally we would not meet the quality requirements.

The replacement of the existing system would have as a consequence a complete new development which is impossible after just having started to produce and to place these boards on the market.

So in a nutshell, if we could not use the existing UV lamps further-on we wouldn't be able in future to serve our customers. This would mean that an essential part of our added value is eliminated. The consequence would be the loss of jobs in the production of those added value products and of course also in the area of administration, work preparation, logistics

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Additionally we do not see the need for replacing mercury containing UV lamps because we cannot see there is an environmental risk by using these lamps and of course also at the end of the life time these lamps are disposed in an environment-friendly manner.

After having recently installed a complete production based on these UV lamps we are facing a disaster if now this latest technology would not be possible no more.

Best regards,

Pfleiderer Deutschland GmbH

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Dr. Axel Knorr

- Head of Corporate Environment-