

Dear Sir/Madam,

We represent the Swedish Paint and Adhesives Association and The Swedish Federation of Wood and Furniture Industry and write to you for the extension of the existing exemption in Annex III 4f: Mercury in other discharge lamps for special purposes not specifically mentioned in the Annex.

Mercury discharge lamps are critical in the curing process of UV-coatings in the wood coatings industry. UV-surface treatment is the absolute dominant technology for treatment of wooden products with high durability requirements. This includes industrial coatings for windows and doors, panels, flooring, kitchen- and bathroom fittings and some furniture. For these products the appearance and performance of the surface is essential. The coating is what the customer sees and feels thus it defines life length of the products.

The formulations of the coating products are specifically adapted to the lamps used for curing. The efficiency of the curing is critical for the coating to function as intended and increase the life-length of the treated products. The alternatives to mercury lamps are not as efficient as the situation stands. The curing process require the wide range of wavelengths and energy output that the lamps used today provide. The process to develop alternatives have been ongoing for years but the systems to replace mercury discharge lamps are not in place yet.

It is a lengthy process to change technology, perform testing to ensure product performance and the curing equipment is a large investment. If the exemption is not extended it would pull the rug out for a lot of companies and remove the UV-technology from the EU – a technology that has benefits with regards to performance and to worker health and the environment as it is an alternative to solvent based systems.

To exemplify the importance and benefits of the UV-technology for coatings the Ecolabel, the Nordic Swan in its criteria for flooring and furniture has stated:

From the background document for Nordic Ecolabelling for floor coverings 9th March 2021¹:

“UV-surface treatment is environmentally positive as it minimizes the use of solvents. The cure (polymerization of the binder) is conducted by illuminating the layer with UV-light. The process is rapid and gives a hardwearing and scratch resistant surface layer.”

¹ https://www.svanen.se/contentassets/45ba946e1393441e92eb4e1a0df695c5/background-document_029_floor-coverings-029_english.pdf

The benefits of the UV-technology for high-performance wood coatings greatly outweigh the risk of the small amount of mercury in lamps used in industrial setting where the lamps can be collected and disposed of under controlled conditions.

As representatives of the Swedish Paint and Adhesives Association and the Swedish Federation of Wood and Furniture Industry we would ask you to consider this when deciding on an extension for the exemption for medium pressure mercury discharge lamps.


Best Regards,



Olof Holmer

CEO

Swedish Paint and Adhesives Association



Robin Ljungar

Sustainability Manager

Swedish Federation of Wood and Furniture Industry

Stockholm

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