

## CONSULTATION QUESTIONNAIRE EXEMPTION NO. 4(F) OF ROHS ANNEX III

Brilon, den 18.05.2021

Dear Sir or Madame,

Regarding to the Consultation Exemption No. 4(f) please find our statement below.

The EGGER Group, with its head office in St. Johann in Tirol, is one of the leading international wood-based materials manufacturers. Founded in 1961, the family-based company now has 20 production plants with approx. 10,100 worldwide employees. Global customers include those in the furniture industry, wood distribution, building markets and the DIY business. The group generated a consolidated turnover of around EUR 2.83 billion in the 2019/2020 business year.

Beside melamine faced boards we produce a wide range of UV-cured and coated surfaces (e.g. Edge Bands, matt and high gloss MDF / Chipboards, Flooring products, Furniture Backboards). In more than 10 production lines we use mercury lamps to cure the varnishes. The production lines are continuously producing 24 hours per day.

Answer to question 1 a+b:

We support the wording, scope and re-requested duration of the exemption at least until 2026. For our production process there are currently no suitable alternatives for mercury UV lamps. A ban of mercury UV lamps would have a significant impact on our production in many aspects. Most important fact is that the only available alternatives (LED, EB) are not useful. We use LED in two specific cases to gell the varnishes (< 3 %). For the final curing of the UV-Coatings there are no available photoinitiators for the monochromatic LED Wavelengths (365, 395 nm) so far. There has been no development on the raw material site to develop such photoinitiators since the last 10 years. This would lead to a very long development and classification time. With the current photoinitiators there is no possibility to coat a material in the same performance and efficiency, with low VOC emission with a high turnover of acrylates than with an mercury UV lamp.

From our experience a shorter period makes no sense. There are no alternatives in this period available so there will be a elimination of all our coated surfaces (flooring, furniture boards, Edge Bands) which will lead to a big change in the whole business.

Answer to question 2 a+b:

As already mentioned in answer 1 the biggest obstacle to advancing LED technology to date has been the lack of functional photoinitiators. This limitates the use for alternatives to a minimum. In our company we have a lot of experience in trials with the LED technology which has led to a small use of LED lamps to pre cure a coating, but in a slow production process (< 30 m/min). In industrial use the energy of LED is not high enough to run the lines in their current speed (60 – 100 m/min). There is no efficient turnover of the photoinitiators which resultates to uncured surfaces, high VOCs and yellowing of the coatings. The need for suitable photoinitiators has not yet been driven forward by manufacturers due to lengthy classification procedures and a market segment that is too small.

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Answer to question 3:

Well known suppliers are: IST / IOT / ITL / Phoseon / Efsen / Hereaus / Hönle

It depends on the specific applications in question whether alternative systems can be used and what changes need to be made to the process (e.g. materials, handling) and to the designing of the overall system. The difference in the emission spectrum of mercury to monochromatic LED has a big complexity and leads to the fact that there is no equivalent exchange possible.

Answer to question 4 b+c+d:

When UV lamps are no longer available, some production lines will no longer be usable. This includes the stored lamps, the housings and reflectors, the electrical and mechanical infrastructure. Entire production lines would no longer be able to be operated and would therefore have to be disposed of. This is difficult to estimate, but it is assumed that this will exceed a quantity of approximately 150 tons.

This would have a high impact on our company and, due to the lack of alternatives, would lead to a discontinuation of the operation of UV systems in the EU and a relocation of production, as otherwise important parts of the company's product range could no longer be offered.

This affects more than 1000 employees in our company partially entire plants.

With kind regards / mit freundlichen Grüßen



i.A.  
Frank Kemmerling  
Leitung CC Lackierung

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