

VDMA and LightingEurope requested the renewal of the above mentioned exemption for the maximum validity periods with the same scope and wording for all EEE of cat. 3 and 5 (VDMA) and cat. 1-10 (LEU).

We as Etex support and agree with wording, scope and re-requested duration of the Exemption No. 4(f) of RoHS Annex III.

In our particular case, we use UV medium-pressure discharge lamps for radiation curing of UV varnish coated fiber cement boards. The UV coatings are used at a layer thickness at about 100µm for highly scratch-resistant, highly cleanable and particularly durable fiber cement boards.

UV LED curing is not suitable for the applied coating thicknesses. The through-curing is not sufficient. The boards coated in this way do not achieve the required mechanical, technological properties. The target layer thicknesses of about 100µm are needed to reliably cover the fiber cement substrate on the one hand, and on the other hand to provide a sufficient protective layer against weather influences and mechanical stress.

If it would be possible, UV LED lamps would already be in use. Unfortunately, the conventional UV medium-pressure discharge lamps used so far are unique in terms of performance and applicability in an industrial production line and therefore have no alternative.

A ban of the UV medium-pressure discharge lamps in this field of application would mean the discontinuation of the product lines coated with UV varnish. However, due to their durability, these have increased the renewal intervals and thus conserved valuable resources. The UV-coated fiber cement boards concerned represent a high 5 digit surface in m² and a value of about 8 digit €. In addition to that A certain number of employees would become redundant.

Answer provided as is by Detlef Thiel on behalf of Etex Germany Exteriors GmbH on the 27th of May 2021.