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Holzkirchen, April 9<sup>th</sup> 2021

## **EU consultation on the continued use of mercury-containing UV lamps**

Dear Sirs,

CCL label is a division of CCL Industries which is one of the biggest label producer worldwide in 180+ plants/21000+ employees globally (30+ plants 1300+ employees in Europe) and includes brands like AVERY, INNOVIA and Checkpoint.

CCL label produces labels, shrink- and stretch-Sleeves, booklets, office and security products (including bank notes) and is organized in divisions that produce labels for home and personal care, food+beverage, healthcare+specialty; electronic devices and consumer goods.

Find details about CCL industries on [www.cclind.com](http://www.cclind.com).

CCL uses uv-curing based on mercury lamps for a lot of application not only because of historical reasons and because of high investment for replacement by UV-LED systems. Mercury lamps offer unique possibilities for curing of inkjet-inks and varnishes that UV-LED does not (yet) offer.

Slip properties of varnishes and surface properties can be adjusted using uv inks with mercury lamps which is not given if using LED-curing but is a need to process the printed product on the customers line.

Last not least a preferred surface property that can only be ensured by curing with mercury lamp is sterility (micro bacterial inactivity) of surface after printing that is a preferred benefit if printing products for food contact or pharmaceutical use.

We do see UV-LED as an additional option that offers some benefits over UV-lamps in some areas of use but does not cover all application properties the industry desires.

Therefore the use of mercury lamps will still be needed for several years not only until new investment and replacement of given installations takes place that's normal depreciation is eight years and longer but also to ensure the variety of products and applications for the near and mid-term future.

A short-term ban for mercury lamps would lead to the loss of certain products, turn over and work place in these areas.

Kind regards

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