

The Hague, 27 May 2021

FINAT is the European association for the self-adhesive label industry, covering the complete value chain of self-adhesive label industry and representing over 500 member companies established in more than 50 countries. The label printing industry alone directly employs around 100.000 people in the EU, with a yearly revenue in the order of €14B. A large proportion of European printing companies are SMEs.

We welcome the opportunity to provide feedback to the consultation questionnaire on the exemption 4(f) of RoHS Annex III, as industrial users of UV lamps.

FINAT supports maintaining the wording and scope of the current exemption and calls for its extension to at least 2026. Many printing companies in Europe rely on mercury-based UV lamps for specific industrial applications, namely the UV-curing of inks and coatings (e.g., varnishes, adhesives, silicones) for which no suitable alternatives are yet available. Unavailability of mercury-based UV lamps in the short term without a suitable drop-in alternative would severely disrupt the label industry value chain, directly impacting the printing of labels for essential products such as food packaging materials, medicines and cleaning products, among others.

While UV-LED technology shows promise, they are not a suitable economically viable alternative to mercury-based lamps for all industrial UV-based printing processes in the short term. Adapting the printing processes to the use of UV-LED would require not only new printing equipment, but also the development of chemicals able to cure under these light sources. Alternatively, regrettable substitution of UV-curable systems by other technologies which are potentially more harmful to the environment (e.g., solvent-borne systems) than existing UV-curing systems optimized for mercury-based UV lamps could occur.

We support the extension as proposed by LightingEurope and VDMA to allow time for the necessary further development of UV LEDs and the required chemicals as suitable alternatives for industrial UV-curing applications in the label printing industry.

Sincerely,



Pablo Englebienne
Regulatory Affairs Manager