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May 26, 2021

To: Bio Innovation Service, UNITAR and Fraunhofer IZM

Subject: Stakeholder Consultation RoHS II – Exemption 4(f)

On behalf of the RadTech Board of Directors, this letter is offered in support of the Exemption Request Forms submitted by LightingEurope AISBL on January 17, 2020 and VDMA e.V. on January 19, 2020. Both applications thoroughly present the case for extending RoHS exemptions for mercury containing lamps listed under Annex III 4(f) *Mercury in other discharge lamps for special purposes not specifically mentioned in this Annex.*

RadTech is the nonprofit trade association dedicated to the advancement of ultraviolet (UV) and electron beam curing processes. The organization has about 500 members worldwide. Europe represents a significant and vital resource in the technical and market development of our technology.

UV curing enables manufacturers to rapidly set inks, coatings, adhesives, and extrusions inline, in a small footprint, and at high speed while also producing performance properties superior to what is achievable with conventionally dried materials. UV curing processes are commonly acknowledged as environmentally responsible and energy efficient. They also have a tremendous record of success in worker health and safety. UV curing technology is widely used in a number of industries including wood and building products, printing and packaging, electronics, automotive, aerospace, medical device, food packaging, 3D printing/additive manufacturing, and numerous others.

The emergence of UV LEDs as an alternate curing mechanism is welcome by our industry; however, UV LEDs are not a suitable replacement technology for many UV curing applications at this time. Alternative materials to mercury cannot be used in current medium pressure UV lamps to produce the same effect. Therefore, RadTech offers its endorsement of the information, evidence, and data provided in the LightingEurope and VDMA applications and supports renewal of Exemption 4(f) in Annex III as proposed.

Please contact me if we may provide further information. Thank you!

A handwritten signature in blue ink, appearing to read "Gary M. Cohen".

Gary M. Cohen
Executive Director