

Dear Ladies and Gentlemen,

Tubex Wasungen GmbH is a company in the packaging industry and manufactures plastic tubes (among over things) which are printed and finished with UV printing inks and UV varnishes.

For the said printing ink system, we are using UV dryers in order to achieve a fast and safe curing of the inks and varnishes.

The topic of the possible non-extension of the exemption regulation for the use of mercury-containing UV lamps is worrying if not threatening for us.

A discussion with partners and suppliers in the fields of UV printing inks, UV varnishes and also manufacturers of UV lamps revealed that a short-term discontinuation of the production of mercury-containing UV lamps and thus of their availability would inevitably lead to a production standstill and the loss of approx. 60 jobs.

A capacity of approx. 75.000.000 plastic tubes also for hand sanitizers, among other things, would then no longer be available.

Customers in the pharmaceutical, cosmetic and other industries could no longer be supplied.

In terms of technology, there are currently no LED printing inks or LED varnishes available for plastic rotary printing that are exclusively dried by UV LED lamps and that fulfill the authenticity and durability tests afterwards.

Surface curing is possible, however, no deep curing. This very important deep curing remains still to be done by UV lamps for printing inks and varnishes.

Even if we wanted, there is currently no alternative on the market that complies with the required performance for a sufficient deep curing.

Furthermore, there is no equipment manufacturer known to us that offers the standard market UV curing ovens as UV LED dryers in its portfolio.

Our suppliers of printing inks and varnishes have already informed us that there is no "off-the-shelf" product for pure UV LED drying systems, but that this will rather involve a long-term development process.

In short, we would like to take this opportunity to express our demand for the renewed granting of an exemption for the use of mercury-containing UV lamps.

Answer provided as is by Micheal Katte on behalf of Tubex Wasungen GmbH on the 3rd of May 2021.