

Bio Innovation Service
7, rue Oberkampf
75011 Paris
FRANCE

Vienna, 27th April 2021

Via E-Mail to: rohs@biois.eu

Re Stakeholder Consultation RoHS Annex III – Exemption No. 4 (f)

Dear Sir or Madam,

On behalf of the Tupack Group of Companies, this letter is submitted to extend our support to the renewal of the exemption no. 4 (f) set forth in RoHS Annex III at least until 2026 and beyond, as requested by VDMA and Lighting Europe.

The Tupack Group of Companies produces plastic tubes (monolayer and co-extruded tubes) and lip care sticks in Vienna and Parndorf, Austria, and currently employs some 1,000 people combined.

It is our firm belief that a potential mercury ban would have an extremely negative worldwide impact on industries, products, markets as well as on employment opportunities and eventually on end consumers at large. The overall socio-economic consequences of a mercury ban would clearly be out of all proportion to the negligible amount of mercury put on the market through the continued availability of mercury-containing discharge lamps.

Moreover, all currently used lamps are recyclable, given that the mercury content can be further processed and can accordingly be reintegrated in manufacturing new lamps. An active and consequent use of existing recycling mechanisms ensures that the mercury contained in discharge lamps may thus be confined to closed-loop processes without having any damaging effect on the environment and/or the personal health whatsoever.

Policy makers are therefore strongly urged to create a functioning recycling system instead, while further increasing public awareness on the necessity of actively participating in and contributing to a recycling loop. This is a win-win situation for all parties involved, as it is thereby ensured that the most efficient technologies remain available and continue to serve the specific needs of our industry.

Sincerely,



Karl Bridl
Managing Director