

INTERGRAF CONTRIBUTION

Consultation questionnaire exemption No. 4(f) of RoHS Annex III

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Intergraf represents 21 national printing federations in 19 countries in Europe. The printing industry provides jobs to 640,000 Europeans active in over 110,000 companies and generates a turnover of approximately € 82 billion. The industry throughout Europe consists mainly of small enterprises, as 90% of them employ fewer than 20 persons.

We herewith would like to provide our contribution to the consultation questionnaire on exemption No. 4(f) of RoHS Annex III as industrial users of UV lamps.

Intergraf supports maintaining the wording and scope of the current exemption and calls for its extension to at least 2026 to allow the continuous use of UV lamps in curing of inks and coatings in printing processes for which no alternative is yet available.

Mercury-based UV curing is widely used in the printing industry for the curing of inks and coatings in several industrial printing processes (sheetfed offset, weboffset, flexography, inkjet, screen printing) for the printing and finishing of many printed products on different substrates. Applications in the printing industry include both publication printing as well as packaging printing.

Many printing companies are still relying on mercury-based lamps for specific industrial applications. We support the extension as proposed by LightingEurope and VDMA to allow time to market UV LEDs alternatives suitable for all industrial applications.
