



September 22, 2023

**Supporting comment to K.Walter's submission as part of the consultation regarding the Per- and polyfluoroalkyl substance (PFAS) restriction proposal**

To whom it may concern,

The European Rotogravure Association (ERA), founded in 1956, has developed into the leading international organisation of the gravure industry. It is a non-profit organisation dedicated to supporting users of the gravure printing process. ERA's mission is to promote gravure wherever it is applied and to contribute to the healthy continuity of the gravure industry. We represent over 60 companies from the field of the rotogravure industry, such as packaging printing for food, decorative printing, printing for publication and embossing. ERA is therefore an important factor in the European supply chain in this sectors.

Companies represented by ERA depend on the continued availability of PFAS-based wetting agents for their processes. Application of PFAS-containing wetting agents is mainly conducted in closed plating units limiting the potential for exposure of the environment and the workplace. The largest manufacturer of closed plating units used for rotogravure and embossing is "Maschinenfabrik Kaspar Walter GmbH & Co. KG" (K.Walter), and these units are also widely used by our member companies.

K.Walter has submitted detailed comments regarding the PFAS restriction during the consultation period. **We would like to express that we fully support the comments submitted by K.Walter concerning the non-availability of alternatives, impacts and the approach to align the restriction with the substitution timelines of CrO<sub>3</sub> used in electroplating units.**

We kindly ask you to take this information into consideration when evaluating the restriction proposal of PFAS for hard-chrome plating.

Kind regards,

A handwritten signature in black ink, appearing to read 'Stefano Janni', is written in a cursive style.

EUROPEAN ROTOGRAVURE ASSOCIATION (E.R.A.) e.V.

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