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European Commission
Directorate-General for
Environment
B-1049 Brussels
Belgium

6 May 2020

Authorisation process of chromium trioxide according to REACH

Dear Sir,
Dear Madam,

the European Rotogravure Association (ERA) is the technical organisation of the European gravure printing industry.

Among our membership are, besides the publication, packaging and decorative gravure printers, also the supply industry (e.g. press and machinery manufacturers) and the cylinder manufacturers. The cylinders are produced in a galvanic process using chromium trioxide which is needed to get a hard chrome surface. There is currently no realistic technical alternative to chromium trioxide for this process.

Altogether in Europe over 1 000 gravure presses are operated and over 1,2 million gravure cylinders are produced for the printing of magazines, catalogues, packaging material particularly for food stuffs, and decorative laminates for flooring and furniture.

According to the European directive and regulation REACH (Registration, Evaluation and Authorisation of Chemicals) the industrial use of chromium trioxide needs an authorisation by the EU, which has to be applied for by the industry concerned and the supply chain. Together with other industries using chromium trioxide (e.g. aviation and automotive industry) the gravure industry is co-operating as downstream user with an industry consortium led by Chemservice GmbH (formerly Lanxess Deutschland GmbH) which has officially applied for the authorisation (CTAC submission - Chromium Trioxide Authorisation Consortium Submission).

Based on the dossier submitted by the industry the responsible ECHA (European Chemicals Agency) came to the conclusion that “the benefits of continued use of Chromium Trioxide outweighs the risks to human health”. They therefore have proposed an authorisation with a review period of seven years for Use Group 2 by which gravure galvanics is covered starting on 21 September 2017 (“sunset day”).

The proposal made by the ECHA was approved by the EU member states at the meeting of the EU REACH Committee in February 2019. Unfortunately the EU Commission withdrew the approval following a motion by the European Parliament to reject the authorisation of the CTAC submission.

We are informed that the CTAC submission now will be on the agenda of the meeting of the EU REACH Committee on the forthcoming 13 May for decision.

In this respect we would like to point out that a further delay or a refusal of the authorisation would endanger the future of the European gravure industry which stands for a yearly turnover of more than € 25 billion and some 10 000 employees.

Please consider that chromium trioxide is used in the gravure industry only under controlled conditions by strictly following all health and safety regulations. The measurement of the airborne chromium(VI) concentration at the workplace is in our industry below $1\mu\text{g}/\text{Nm}^3$ chromium(VI). (The EU has recently set the BOEL – “binding occupation exposure limit value” – at $10\mu\text{g}/\text{Nm}^3$ which will be in future $5\mu\text{g}/\text{Nm}^3$. Thus, the values measured in our industry are significantly below the value set by the EU!)

We furthermore would like to mention that the gravure industry is only a small part of the industries covered by the CTAC submission. Thus the damage for the European industry would be far higher if the authorisation would be refused.

As the gravure industry urgently needs reliability and security for their planning and investments we kindly ask you to support the authorisation for our industry by approving the CTAC submission in the meeting of the EU REACH Committee on 13 May.

Yours sincerely,



Manfred Janoschka
President



James Siever
Secretary General