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To:

Members of the European Parliament

10 June 2020

**Authorisation process of chromium trioxide according to REACH;
Motion by the Environmental Committee to reject REACH Law authorisation for
certain uses of chromium trioxide**

Dear Madam,
Dear Sir,

We refer to the motion for a rejection of REACH Law authorisation for certain uses of chromium trioxide which was adopted by the Committee on Environment, Public Health and Food Safety on 8 June, and which will be presented to the European Parliament for approval in its forthcoming plenary session on 17 or 18 June.

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 economical and 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.

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 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 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. However, the EU Commission withdrew the approval following a motion by the European Parliament to reject the authorisation of the CTAC submission, and retabled the CTAC Submission to the EU REACH Commission.

The REACH Commission has again discussed the CTAC submission in their video conference meeting on 13 May. However, instead of a decision the EU Commission asked to postpone a final decision, as they expected another initiative by the European Parliament against the chromium trioxide authorisation.

The Environmental Committee of the European Parliament has now adopted a motion to reject the REACH Law authorisation for certain uses of chromium trioxide (with references to the CTAC Submission) on 8 June. This motion will be presented to the European Parliament for approval in its plenary on 17 or 18 June.

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 segment of the industries using chromium trioxide. Chromium trioxide is used in the production process for products e.g. in the traffic sector (cars, airplanes etc.) to guarantee the indispensable properties such as hardness, protection against corrosion etc.. But chromium trioxide is in no way included in such products which come into direct contact with consumers. If chromium trioxide would be banned in the EU, many indispensable products would be produced outside the EU in future.

As the gravure industry urgently needs reliability and security for their planning and investments, we ask you to consider that such a motion would unnecessarily delay the further decision procedure on the CTAC submission, and may negatively affect the future of our industry.

Yours sincerely,



Manfred Janoschka
President



James Siever
Secretary General