



E.R.A. · Swakopmunder Straße 3 · 81827 Munich · Germany

Madame Amélie de Montchalin  
Ministère de la Transition écologique  
et de la Cohésion des territoires  
244, Boulevard Saint Germain  
75100 Paris  
France

Munich, 24 May 2022

**Order specifying substances contained in mineral oils prohibited for use on packaging and for printed matter distributed to the public**

Dear Madam,

The European Rotogravure Association (ERA) represents the European gravure industry. Among our membership are the major publication printers which are printing most of the magazines and catalogues with high circulation for the European market, as well as leaflets used by the large supermarket chains for their marketing.

We have noted with great concern your initiative to ban mineral oils containing substances for printed matter as this would endanger the publication printing and publishing industry. To print magazines and catalogues, as well as information leaflets in the quality and volume required by the market would practically not be possible anymore without using conventional printing inks. A further reduction of the content of mineral oil in printing ink would neither be ecological nor economical possible. Realistic alternatives to the currently used inks are not available at the moment. A ban therefore would endanger the future of the publication printing industry.

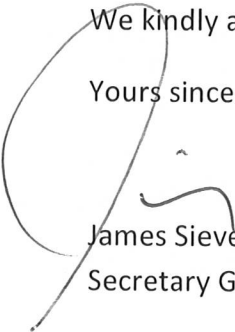
The latter is valid for those printers using the offset process. As far as the gravure process is concerned, we would like to point out that the gravure printers actually use toluene solvent based inks which are not regarded as mineral oil containing inks.

However, it is unclear whether the order also includes gravure. Without toluene based inks the publication gravure printers in France must stop production. A clarification that gravure printing is not affected by the order would be helpful.

We also would like to point out that the draft order would be a distortion of the European single market as it would exclude the import of printed matters such as magazines, catalogues and leaflets produced with conventional inks in accordance with European legislation.

We kindly ask you to reconsider this legislative proposal,

Yours sincerely,



James Siever  
Secretary General

cc./ Monsieur Bruno Le Maire - Ministère de l'Économie, des Finances et de la  
Souveraineté industrielle et numérique