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Gary M. Cohen

October 9, 2015

To : rohs.exemptions@oeko.de

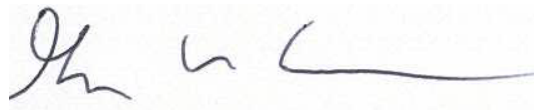
Subject : Stakeholder Consultation RoHS II – Exemption 4(f)

On behalf of the RadTech Board of Directors, this letter is submitted in support of the submission by Lighting Europe concerning mercury containing bulbs. RadTech is the non profit trade association dedicated to the advancement of ultraviolet (UV) and electron beam curing processes. With over 700 members worldwide, Europe represents a significant and vital resource in the technical and market development of our technology. UV curing processes are commonly acknowledged as environmentally responsible, energy savings and with a tremendous record of success in worker health and safety. The technology is widely used in a number of industries including wood and building products, printing and packaging, electronics, automotive, aerospace, food packaging, and 3-d printing/additive manufacturing, as well as numerous other applications.

The emergence of UV LEDs as an alternate curing mechanism is welcome by our industry. However, UV LEDs are not considered a suitable replacement technology at this time for many of our applications; and alternative materials to mercury cannot be used in the current bulbs to produce the same effect.

Therefore, RadTech would like to offer its endorsement of the information, evidence and data provided in the Lighting Europe Application and offer its support to the Application to renew the Exemption 4(f) in Annexe III, as proposed by Lighting Europe.”

Please contact me with any questions. Thank you!



Gary M. Cohen
Executive Director