



September 18, 2023

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

To whom it may concern,

Acimga is the association of Italian manufacturers of machinery for the graphic, paper and converting industry. Established in 1947, it plays a key role in the industry both in Italy and internationally representing “Made by Italy” production – that is, not just machinery produced in Italy, but the wealth of competence and expertise unique to the country, which is the trademark of these technologies, regardless of where they are manufactured. The association carries out lobbying activities, oversees institutional and parliamentary activities in support of the supply chain, monitors legislative actions in the interests of the industry. Italy is among the top three exporters in the world with a market share of nearly 10%. Acimga’s shareholders – currently just less than 70 – represent over 60% of the total industry turnover in the sector and 70% of export turnover. The Italian industry closed 2022 with positive revenues (+7,3%) over the previous year, with a value of €2.945 million.

We, ACIMGA, represent about 70 companies from that 20 in the field of the rotogravure industry, such as printing for packaging, decorative printing, printing for publication and embossing (Italian Rotogravure Group by ACIMGA) in Italy. ACIMGA is therefore an important factor in the European supply chain in this sector.

Companies represented by us 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 CrO3 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



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