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Comments on the public consultation on inclusion of Aluminosilicate Refractory Ceramic Fibres and Zirconia Aluminosilicate Refractory Ceramic Fibres (ASW/RCF) in the Authorisation List (Annex XIV)

ECHA has invited interested parties to submit comments on the latest proposal to include Aluminosilicate Refractory Ceramic Fibres and Zirconia Aluminosilicate Refractory Ceramic Fibres (ASW/RCF) on the Authorisation List. The Federation of Finnish Technology Industries would like to highlight the following points:

The use of ASW/RCF in industrial applications

Alumino Silicate Wool (ASW/RCF) products are high temperature insulation wools (HTIW) that fall under the category of man-made mineral wools. HTIW are refractory materials mainly used in industrial high temperature processes. ASW/RCF have been manufactured and used since 1942. ASW/RCF products are mainly used above 600°C; most often in combination with other types of refractory materials.

ASW/RCF are used for example in metal production (steel and nonferrous metals) and metal processing (such as forging and foundries). The materials are used for insulation and fire protection in furnaces, heaters, lining for furnace doors and other high temperature applications (up to 1600°C).

In Europe, about 1 250 professional workers handle regularly ASW/RCF products, either in production or through further re-processing. In total 10 000 to 25 000 employees occasionally come into contact with these products. The member companies of the Federation of Finnish Technology Industries are downstream users, where the exposure to fibrous dust from ASW/RCF products is very limited, in most cases below the detection limit. Only trained operators may handle and work with these materials and they are handled under high levels of control. In the whole Europe, after more than 60 years of industrial use, no human disease related to exposure to ASW/RCF dusts has been identified.

In energy intensive sector, such as the metals industry, the energy costs can represent up to 40 % of total operational costs. The low mass and resulting good thermal insulation properties of ASW/RCF products allow for significant energy savings in industrial thermal processing procedures, thus having an important contribution to global CO₂ reduction. RCF/ASW are seen essential also to meet the CO₂ reduction and energy efficiency targets. To reduce CO₂ emissions innovation is required as well as industry that is competitive globally.

Using ASW/RCF products instead of or in combination with traditional heavy-weight or lightweight refractory linings and other process components (e.g. modern burner systems) can result in energy savings of up to 50 % in some of the high-temperature installations. The use of ASW/RCF products assists Europe as a whole to achieve the targets of major environmental EU initiatives and programmes: examples of these are the Ecodesign directive for energy-using products, EU Emission Trading Scheme and Resource Efficiency programmes. As a result, it also helps EU industry to remain competitive on a

global scale. This has been acknowledged, for example, in the Ecodesign study Lot 4 “Industrial and Laboratory Furnaces and Ovens” commissioned by the European Commission: “Alumino-silicate RCF products, better described as alumino-silicate wools, are one of the most energy efficient insulation materials available with, in many applications, no alternatives that have the same performance.”

Legislation of ASW/RCF

The use of ASW/RCF products is highly regulated and exposure of the general public to ASW/RCF fibrous dust has not been observed. ASW/RCF was classified a Category 2 carcinogen in 1997. Since then, doubts on the conclusion of this study have been noted because of a likely false positive effect due to overload in animal testing. Thus, it is important that ASW/RCF is re-evaluated and re-classified.

Workers' protection is required when working with RCF/ASW. The materials are regulated by the Chemicals Agents Directive 98/24/EC (CAD) and the Carcinogens Mutagens Directive 2004/37/EC as well as the CLP Regulation. In addition to that, some Member States have established national OELs in order to control the exposure. RCF/ASW do not need further regulation as the existing legislation and the regulatory risk management measures in place are sufficient to handle the risk and control the exposure in the workplace.

Alternatives

Article 4 of Carcinogens and Mutagens Directive 2004/37/EC requires carcinogens and mutagens to be replaced by other substances which are non-dangerous or less dangerous to workers health and safety. Industry has been in the process of replacing RCF/ASW as far as technically and economically feasible. For a number of applications, however, these materials remain the best solution to date. For example, for iron and steel production processes, no alternatives have been found with the same performance capable to withstand the high thermal and mechanical stresses. RCF/ASW are the most energy efficient insulation materials available to date. If alumino-silicate wool (ASW/RCF) could not be used, EU energy consumption would increase very significantly. The replacement of RCF/ASW would require the need to carry out more frequent maintenance programs, which would result as less resource efficiency and less competitive industry.

Information of the respondent

The Technology Industry is comprised of five sub-sectors:

- Metals Industry
- Mechanical Engineering
- Electronics and Electro-technical Industry
- Information Technology
- Consulting Engineering

The Technology Industry represents:

- The Federation of Finnish Technology Industries has some 1 600 member companies.
- 60% of total Finnish exports.
- 80% of private-sector R&D investment.

Mia Nores

- Some 290,000 employed directly in the sector, 725,000 employed in total, equalling about 30% of the entire Finnish labour force.
- The Federation of Finnish Technology Industries has some 1,600 member companies.

Contact person:

Mia Nores, Head of Sustainability, email: mia.nores@techind.fi,
tel. + 358 9 192 3338.