

Substance:
Nonylphenol; Nonylphenol ethoxylates
EC number: n/a
CAS number: n/a

Comments and response to comments on SEAC draft opinion on Annex XV restriction dossier proposing restriction on **Nonylphenol; Nonylphenol ethoxylates**
Annex XV report submitted by Sweden
Public consultation on SEAC draft opinion started on 18 June 2014

Comments on the SEAC draft opinion

Ref.	Date/Name/Org.	Comments
114	<p>Date/Time: 2014/07/17 15:16</p> <p>Organisation: A.I.U.F.F.A.S.S. (Silk and Man Made Filament European Users Association)</p> <p>Type: Industry or trade association</p> <p>Country: France</p> <p>Name confidential: False</p>	<p>Comment: The use of NPs and NPEs is severely restricted in Europe since 2005 and we know that silk and man made filament articles of different nature and composition produced and processed in Europe usually comply with such a requirement. However I have to point out that European Silk Twisters and Weavers cannot avoid to rely upon imports of silk materials and silk piece goods coming from extra E U. They may sometimes contain concentrations of NPEs higher than 100/mg/kg. SEAC proposal foresees that “textile clothing, fabric accessories and interior textile that can be washed in water shall not be placed on the market 60 months after entry in force of the restriction”, unless they are under 100 mg/kg. It will be necessary to inform Chinese and Indian producers about new restriction. It will take some time to make extra E.U. silk producers sensitive to the new restriction and to organize the compliance with the limit value in international silk market. It will be fundamental, in this perspective, that E.U. will intervene officially with Chinese and Indian authorities, in the framework of bilateral contacts. It will be necessary to clear out stocks of silk materials and silk piece good. For this reason the 60 months transitional period, after entry in force of the restriction, will be fundamental.</p> <p>SEAC Rapporteurs response Many thanks for your comment and your support for a 60 months transitional period, which is in line with almost all stakeholders’ comments that were received in different consultations on this restriction proposal.</p>
115	<p>Date/Time: 2014/07/30 12:27</p> <p>Organisation: ClientEarth</p>	<p>Comment: This comment addresses SEAC’s conclusions on proportionality. It is quite clear from the dossier and from the range of information gathered that the restriction is proportionate in achieving its objectives. Therefore we would recommend to change the wording on the conclusions on proportionality at page 18 which reads “In this respect, SEAC regards a restriction on NPE in textile articles not being</p>

<p>Type: International NGO</p> <p>Country: United Kingdom</p> <p>Name confidential: False</p>	<p>disproportionate." to "In this respect, SEAC regards a restriction on NPE in textile articles being proportionate." This wording would also be consistent with the background document which states at pages 360 and 377 "To conclude, the proposed restriction is judged to be proportionate since [...]"</p>
	<p>SEAC Rapporteurs response Many thanks for your comment. We are happy to discuss your proposal with SEAC members at the next meeting in September.</p>