ACEA[1] response to the EU public consultation on the ECHA recommendation to include „ (Zirconia-) Alumino silicate Refractory Ceramic Fibres“(short here: “RCF”) in REACH Annex XIV:

1. Usage of RCF in the Automotive Industry (AI):

RCF are used (where substitution is not possible) for parts of vehicles as well as in some production processes and also in specific uses in the automotive industry supply chain. Examples for these uses include mats within catalytic converter systems, mats within diesel particulate filter systems or special heat insulation purposes, for example in older airbag constructions or heat treatment ovens in high temperature manufacturing processes. For all these uses exemptions need to be granted. The reproduction of automotive spare parts such as catalytic converters systems is essentially dependent on application of the materials which are used during series production and type approval. For the production of spare parts, industry misses any option of substituting the use of RCF. It is needed to maintain the integrity of the performance of the parts in relation to the performance of the vehicle as a whole due to the shortage of “old” vehicles for validation purposes. This “repair as produced” principle has to be applied, otherwise spare parts will be unavailable and the loss for the customer will be unacceptable.

In the automotive manufacturing process RCF products are used in heat treatment furnaces in high temperature manufacturing processes above 800°C. There are a range of materials and components that undergo some kind of thermal processing in vehicle manufacturing as well as in automotive supplier industries. Without these materials and components a modern car would be impossible to produce. The use of RCF as a thermal insulation material in these processes is indispensable in the manufacture of cars, which today must fulfil stringent requirements related to safety, efficiency and comfort in a highly competitive global market. Many elements in the production of modern vehicles are the state-of-the-art in processes and components. These safety-critical parts must fulfil various criteria in terms of stiffness, longevity and predictable deformation characteristics in the case of an accident. At the same time they must be lightweight and competitively priced. Modern steel alloys are required to produce these parts (often very complex 3D geometries) in a “hot pressing” process – both the steel making and the final forming process involve thermal treatment at various stages – this is one example where RCF in combination with other refractories has proven to be the most effective and efficient process insulation material. Other examples include parts of the drivetrain (engine, turbocharger and gearbox) as well as various electronic components.

---

[1] **About ACEA:** ACEA is the European Automobile Manufacturers' Association (**www.acea.be**), representing the fifteen Europe-based car, van, bus and truck makers. ACEA speaks on behalf of a sector that is vital to EU growth and plays an important part in Europeans' lives, from employment and social benefits, to education, innovation, investment, and product and mobility concepts. ACEA's members provide direct employment to more than 2.2 million people and indirectly support another 10.7 million jobs mostly in small and medium-sized enterprises of the automotive supply chain.

All uses of RCF in the automotive industry supply chain are well controlled and create no unacceptable risk to workers health or environment (Art 58.2), see also point 3.

2. Identification of RCF according to ECHA Definition:

EU definition by ECHA:
Aluminosilicate Refractory Ceramic Fibres (Al-RCF) are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.1 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the three following conditions:

a) oxides of aluminium and silicon are the main components present (in the fibres) within variable concentration ranges
b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometers (μm)
c) alkaline oxide and alkali earth oxide (Na2O+K2O+CaO+MgO+BaO) content less or equal to 18% by weight.

No CAS number given by ECHA!

EU definition by SCOEL:
Refractory ceramic fibres with the exception of those species elsewhere in Annex VI to Regulation (EC) 1272/2008 (Man-made vitreous [silicate] fibres with random orientation with alkaline oxide and alkali earth oxide [Na2O+K2O+CaO+MgO+BaO] content less or equal to 18% by weight) Synonyms: Vitreous siliceous fibres, alumino-silicate glass wools Formula:
EU classification: Carc. 1B Causes cancer by inhalation
Annex I Index Nr.: 650-017-00-8; **CAS: 142844-00-6**

Conclusion: Identification and definitions have to be consistent! Terminology according to DIN EN 1094-1 part 1 and CAS: 142844-00-6 should be used to overcome the inconsistencies.

3. Risk of RCF for worker and environment:
Recommendation from the Scientific Committee on Occupational Exposure Limits (SCOEL) for RCF has been published in September 2011 (SCOEL/SUM/165) with a health based limit value of 0.3 f/ml (or 300000 F/m³) based on the conclusion that RCF are classified into SCOEL carcinogen group: C (Genotoxic carcinogens for which a practical threshold is supported). Usage of RCF in the automotive industry is well controlled by safety regulations in Europe and exposure is far below that limit value. **Any appreciable risks for worker are not given.**

Investigation of the fibres found in air samples (EURIMA samples) by an independent institute (GSA) could not identify any manmade alumino silicate RCF in the environment. **Therefore the risk for the environment is negligible.**

4. Overall Conclusion:

Caused by lack of risk for human (worker-) health or environment a prioritisation of not clear identified or defined RCF for Annex XIV is not purposeful and can cause in opposite to the aims of REACH negative effects for environment and competitiveness of European Automobile Industry (Art 55). In the case of the industrial use of RCF, REACH is a conflicting regulation with other EU-regulations, programs and initiatives (EU 2020; ETS, EuP-Lot 4 etc.). Therefore this process should be set on hold and be evaluated in an overall view in favour of the environment and economy.

For any additional information, please contact the following person:

Peter Kunze
Director Environmental Policy
ACEA - European Automobile Manufacturers Association
Avenue des Nerviens 85, B-1040 Brussels
T +32 2 738 73 41, mail: pk@acea.be

***