**General comments and answers to specific information requests**

**Specific information requests:**

1. Any further information on uses of Dechlorane Plus as a flame retardant in adhesives/sealants and polymers or as an extreme pressure additive in greases in the automotive sector, the aviation sector, electrical and electronic equipment and fireworks but also in electrical batteries and accumulators, fabrics, textiles and apparels, and plastic articles. Although the above uses have been reported as identified uses, very limited information was collected during the consultation that took place during the preparation of the restriction proposal. Relevant information could include, amounts currently used, site-specific emission data (associated with manufacture, service-life or end-of-life), and any impacts (costs and benefits to society) of the proposed restriction on these uses (in line with the elements of a socio-economic analysis (SEA) as outlined Annex XVI of REACH).
2. Information on chemical and non-chemical alternatives to Dechlorane Plus when used as a flame retardant or as an extreme pressure agent. In particular information on any specific technical criteria relevant to specific uses that could not be fulfilled by the listed alternatives or by other flame retardants or lubricants.
3. Information on actual concentration of Dechlorane Plus in recycled materials (or as impurity in substances and mixtures) and information on how recycling (especially of plastic materials) could potentially be affected by the proposed restriction.

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| Ref. | Date/Type/Org. | Comments |
| 3332 | Date:  2021/07/08 07:10  Content:  Scope or restriction option analysis  Description of analytical methods  Information on alternatives  Information on benefits  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Japan Auto Parts Industries Association  Org. country:  Japan  Attachment: | General Comments:  The Japan Auto Parts Industries Association (JAPIA) was established in August 1969 as a “public interest incorporated association” aimed at working to promote the auto parts industry of Japan. Since its reorganization in December 2011 as a “general incorporated association”, JAPIA has been engaging in various activities for the further development of the industry.  For automobile safety and comfortable driving, the high quality of each automobile part is a great contribution. The environmental situation in the auto parts industries ran into unprecedented difficulties such as structural change, promotion of international corporations, etc. However, JAPIA actively makes an effort towards these problems together with JAPIA member companies.  The number of Japanese Automotive Suppliers are 6,700 companies with 686,000 people directly employed. The yearly sales is 290.2 billion euros. Automobile industries accounts for 17.5% of the total manufacturing shipment value in Japan. Automobile parts account for more than 50% of total automobile industry shipment value and half of them are from JAPIA member companies. |
| Answer to specific info request 1:  As stated in the ANNEX XV Restriction report, the Automotive Industry is the largest user of “Dechlorane Plus”. The main applications of “Dechlorane Plus” used in vehicle\* parts can be found in the following 4 categories. - Wire harness, adhesive, tape and ‘diallyl phthalate prepolymer’ \*: vehicle includes automobile, construction, machinery, agriculture and so on |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3352 | Date:  2021/07/26 11:28  Content:  Scope or restriction option analysis  Information on alternatives  Other socio economic analysis (SEA) issues  Transitional period  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  COCIR  Org. country:  Belgium  Attachment: | General Comments:  COCIR represent companies producing medical imaging (MRI, CT, X-ray, PET , SPECT, Ultrasound and combined modalities) and radiotherapy devices (Linacs, Brachythrapy, Radiosurgery, Particle therapy). Most of such devices weight 5 to 10 tons on average (up to hundreds), have 15-20+ years long life and contains hundreds of thousands of components (and millions of articles).  DP was added to the candidate list in 2018. So far, several applications of DP have been identified, covering hundreds of parts used in medical imaging devices. A more detailed analysis of the uses will be submitted later on during the consultation.  Nonetheless, the complexity of the involved technology (MRI, CT, Beam/particle Therapy, X-ray, etc) also implies that some applications of the targeted substances may be discovered at a later stage and substitution might turn out to be not possible in a short period of time.  As medical devices can be used for 10 to 20 years, it is essential such devices can be repaired to avoid downtimes that will prevent patients from getting their exams. The “repair as produced” principle enshrined in the RoHS Directive and internationally recognized, should be included in the Dechlorane restriction. |
| Answer to specific info request 1:  Information on uses will be provided later on bfore the end of the consultation as they are now under investigation. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3353 | Date:  2021/07/27 15:48  Content:  Scope or restriction option analysis  Information on alternatives  Information on benefits  Other socio economic analysis (SEA) issues  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  AeroSpace and Defence Industries Association of Europe (ASD)  Org. country:  Belgium  Attachment: | General Comments:  Information on the elements selected above are included in the non-confidential attachment |
| Answer to specific info request 1:  Information is provided in the non-confidential attachment |
| Answer to specific info request 2:  Information is provided in the non-confidential attachment |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3354 | Date:  2021/07/28 03:43  Content:  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Japan Electronics and Information Technology Industries Association(JEITA)  Org. country:  Japan  Attachment: | General Comments:  We can basically support the gist of the proposal, especially the proposed threshold which is manageable and proportionate to the possible risk. However, our products, electrical and electronic equipment, are made at the end of the global long and winding supply-chain, and chemicals are used at upstream in many cases. Therefore, we would like to propose some modification to make the proposed restriction manageable for complicated products having relatively long useful-life.  (1) At least 36 months should be provided as transitory period before the restriction for complicated articles such as electric and electronic equipment. Products with longer design cycle, such as production machinery and infrastructure equipment, would need much longer transitory period. Justification: The proposed restriction covers an industrial chemical currently used. In such cases, based on the experience of compliance with the RoHS Directive, a period of at least three to four years is necessary to implement substitution in the article. Please note that products with longer design cycle, such as production machinery and infrastructure equipment, would need much longer transitory period.  (2) Derogation for spare parts for old products should be set. A general exemption of spare parts without expiry date would be indispensable for complex articles to extend their useful life, if their original products are placed on EU market before the requirement comes into force. Proposed derogation: Paragraph 2(c) shall not apply to spare parts for the repair and the reuse of the articles (or electric or electronic equipment) already placed on the EU market before the date referred to in paragraph 2 [36 months from entry into force of the regulation]. Justification: We believe that the procedures to make it possible to use the spare parts and recycled materials should be established from the view-point of circular economy. Availability of spare part must be secured to establish circular economy. Complex products such as EEE need spare parts same as those used in the first production of each product, because changing a part is not simple a procedure as shown below. Especially when the sale of a product model is discontinued, only old spare parts produced before the restriction would be available for such model. If EEE cannot have spare parts as produced, the EEE will not be able to be repaired and then it might shorten its lifetime and abandoned earlier than its intended lifetime.  (3) Derogation for articles already placed on the market before implementing the restriction should be provided. With such derogation, used, repaired or refurbished products would be able to be used after the restriction without problems. Proposed derogation: Paragraph 2(c) shall not apply to articles already placed on the EU market before the date referred to in paragraph 2 [36 months from entry into force of the regulation].  Justification: After its service life some Electrical and Electronic Equipment is refurbished and sold again. In the light of the ambition for a circular economy, the re-use of products is one of the most effective measures. The current wording of the proposed restriction prohibits the refurbishment and sales of older product. A general restriction on articles with Dechlorane Plus would make it impossible to be certain about compliance for refurbished products. We will not be able to refurbish products in the future and will be forced to dispose of them. We therefore ask for a derogation for articles already placed on the market before entry into force of the restriction. |
| Dossier submitter response: |
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| 3355 | Date:  2021/07/28 18:37  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Raytheon Technologies (RTX)  Org. country:  Belgium  Attachment: | General Comments:  Raytheon Technologies (NYSE: RTX) is an aerospace and defence company that provides advanced systems and services for commercial, military and government customers worldwide. RTX was formed in 2020 through the combination of Raytheon Company and the United Technologies Corporation's aerospace businesses. Raytheon Technologies (www.rtx.com) consists of four highly specialized businesses: (1) Collins Aerospace; (2) Pratt & Whitney; (3) Raytheon Intelligence & Space; and (4) Raytheon Missiles & Defense. RTX employs 190.000 people worldwide, of which more than 20.000 in 22 European countries. RTX has contributed to the comments submitted by the European AeroSpace and Defence Industries Association (ASD) as part of this public consultation on Dechlorane Plus (DP) and fully supports those ASD comments. For your convenience, we attached the ASD paper in Section IV below. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3356 | Date:  2021/07/28 23:33  Content:  Scope or restriction option analysis  Information on alternatives  Other socio economic analysis (SEA) issues  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Fédération des Industries Electriques, Electroniques et de Communication  Org. country:  France | General Comments:  In the electrical equipment sector, Dechlorane Plus (DP) is used in wires combined with a thermal protector to withstand high temperatures imposed by the normative requirements. This substance has been added to the Candidate list on 15th January 2018. Due to these delays, to date companies using Dechlorane Plus have not been able to : - Initiate and finalise substitution procedures with their suppliers for all their products; - Assess whether potential alternatives could meet their requirements; - Implement the necessary changes on their products and processes; - Carry out the tests necessary for the placing of CE mark, including laboratory tests. Any change to a safety feature in electrical and electronical equipment (EEE) or components requires to ensure that the alternative solution does not negatively impact other safety parameters for users. The necessary development processes require a sufficiently long period, which we estimate at five years. Our sector faces long lifetimes and high reliability and safety requirements on equipments. The availability of spare parts is essential to guarantee longer product lifetimes, prevent waste generation earlier than necessary and preserve a sufficient level of performance over the products lifetimes. To extend the lifetime of products by way of repair represent a core element of EU’s resource efficiency policies, EU waste treatment hierarchy and has recently been encouraged by the Commission implementing regulation (EU) 2021/876 of 31 May 2021 laying down rules for the application of Regulation (EC) No 1907/2006 as regards applications for authorisation and review reports for the uses of substances in the production of legacy spare parts and in the repair of articles and complex products no longer produced and amending Regulation (EC) No 340/2008. Furthermore, our sector faces increasing requirements regarding the incorporation of recycled content in new products and obligations of public buyers to purchase an increasing rate of products that have been reused, repaired or that incorporate recycled materials. For all of the above reasons: - A transitional period of at least five years' duration will be necessary to implement the proposed restriction of Dechlorane Plus for electrical and electronic equipment (EEE); - A derogation for spare parts for existing EEE during their lifetime must be considered to prevent any inconsistency between separated regulations and waste generation; - A derogatory concentration threshold for products containing DP in recycled material must be considered, for uses that do not pose a risk to human health or the environment, to prevent any inconsistency between separated regulations and limit the possibilities of integrating recycled materials. |
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| 3390 | Date:  2021/09/14 14:34  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  DIGITALEUROPE  Org. country:  Belgium  Attachment: | Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |

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| 3398 | Date:  2021/09/17 16:24  Content:  Scope or restriction option analysis  Description of analytical methods  Other socio economic analysis (SEA) issues  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Plastics Recyclers Europe (PRE)  Org. country:  Belgium  Attachment: | General Comments:  Plastics Recyclers Europe (PRE), the association representing the plastics recycling industry, welcomes the opportunity to provide clarifications on the annex XV restriction report for Dechlorane Plus (DP) at 0,1%. The attached document focuses on the recycling section of the proposal targeting end of life vehicles (ELV) and the waste electrical and electronic equipment (WEEE). |
| Answer to specific info request 1:  Please see the attached document. |
| Answer to specific info request 3:  Please see the attached document. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3527 | Date:  2021/11/08 03:44  Content:  Information on alternatives  Other socio economic analysis (SEA) issues  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Japan Auto Parts Industries Association  Org. country:  Japan  Attachment: | General Comments:  The Japan Auto Parts Industries Association (JAPIA) was established in August 1969 as a “public interest incorporated association” aimed at working to promote the auto parts industry of Japan. Since its reorganization in December 2011 as a “general incorporated association”, JAPIA has been engaging in various activities for the further development of the industry.  For automobile safety and comfortable driving, the high quality of each automobile part is a great contribution. The environmental situation in the auto parts industries ran into unprecedented difficulties such as structural change, promotion of international corporations, etc. However, JAPIA actively makes an effort towards these problems together with JAPIA member companies.  The number of Japanese Automotive Suppliers are 6,700 companies with 686,000 people directly employed. The yearly sales is 290.2 billion euros. Automobile industries accounts for 17.5% of the total manufacturing shipment value in Japan. Automobile parts account for more than 50% of total automobile industry shipment value and half of them are from JAPIA member companies.  Submit answers to additional questions. |
| Answer to specific info request 1:  In JAPIA's calculation, 20 to 60g is used per car. In Japan, wire harnesses containing DP are widely used. The content per vehicle in Japan includes this wire harnesses application. On the other hand, in Europe, where inorganic flame retardants (Inorganic hydroxides such as aluminum hydroxide and magnesium hydroxide) are easily available, DP is rarely used for wire harness applications, so I think the figure reported by ACEA is smaller than that of JAPIA. In addition, the consumption of JAPIA includes construction equipment and industrial vehicles that share parts with automobiles, so I think there is a big difference in the overall consumption. Alternative costs in the Japanese auto parts industry - The one-off costs a company would incur to alternate 　24,000-450,000€ per company - Total one-off costs e.g. R&D, test (euro) 685,000-21,200,000€ per company 　(Too diffucult to estimate the cost of spare parts) |
| Answer to specific info request 2:  As an alternative to DP - Wire harnesses: Plan to change to inorganic flame retardant. - Tape: Plan to change to inorganic flame retardant. Since these are already in use today, as stated in the written opinion - Material development: 2 years　Done - Evaluation of material, parts: 1 year - Parts approval by customers: 1 year - Alignment/Update of production line/facility: 1year - Change-over (Engineering change release, Production control): 2 years It is carried out on this schedule. We believe that these parts can be replaced if there is time to 2027. As for PDAP resin, no alternative material with the same performance has been found at present. Change to inorganic flame retardant(Metal hydroxide) has the effect of deteriorating electrical characteristics (high tracking resistance) which is the excellent characteristic of PDAP resin, As we answered in our document, we have a plan that Changing from PDAP to no restricted halogen flame retardant while keeping capability of flame retardant and workability but it can be disappointing alternative plan. PDAP resin which has better tracking resistance than phenol resin is adopted by parts of next-generation vehicle and it is needed by the world including Europe. Under the situation of proceeding the EV conversion of vehicles and increasing demand for PDAP resin, we believe that it is necessarry to pay attention to the use of PDAP resin while considering contribution to the environment. |
| Answer to specific info request 3:  At the time of manufacture, the effects on the human body and the environment are considered to be properly controlled. There is no concern about DP release from components. In the case of this, concern is only about release of the disposal phase. When we look at the release at the disposal phase, recycling rate of vehicles has already achieved at 95% to comply with the ELV Directive, therefore, it can be concluded that the release to the environment will be extremely low. |
| Dossier submitter response: |
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| 3528 | Date:  2021/11/19 03:33  Content:  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Japan Agricultural Machinery Manufacturers Association  Org. country:  Japan | General Comments:  Japan Agricultural Machinery Manufacturers Association (JAMMA)  JAMMA’s Comments for “Dechlorane Plus” restriction proposal of ECHA Public Consultation   1. Introduction JAMMA was established in 1939 and is the nationwide organization of agricultural machinery manufacturers in Japan, and aims at contributing to the sound development and progress of agricultural machinery industry and the growth of national economy. We work on a wide range of activities such as development of technology, safety, environment and standardization. We are working on solving various problems in collaboration with agricultural machinery industry associations of other countries, and we have a particularly friendly relationship with Japan Auto Parts Industries Association (JAPIA).  2. Problems of restriction proposal Agricultural machinery has a long life cycle used by farmers, and manufacturers are responsible for the continuous supply of maintenance parts needed by the farmers who own their products. - “Dechlorane Plus” is essential for flame retardance and seizure resistance, and is used in agricultural machinery for components such as harnesses, polymers, greases, etc. - The restriction proposal will not only put a heavy burden on companies that manufacture agricultural machinery, but will also put a burden on farmers in EU. - It is not possible to directly replace with an alternative technology, or it takes a lot of time to prepare replacements, and the procurement cost is high. Lead time is necessary to complete the following actions; Material development: 2 years Evaluation of material, parts: 1 year Parts approval by customers: 1 year Alignment/Update of production line/facility: 1 year Change-over (Engineering change release, Production control): 2 years  3. Conclusion JAMMA and JAPIA (Japan Auto Parts Industries Association) have discussed the problems associated with the restriction of Dechlorane plus under the REACH regulation, and as a result, we strongly support JAPIA's position. JAMMA also believes that this timing of regulation is too early, so we would like to see flexible compliance with the regulation, including exemptions. If “Dechlorane Plus” is to be regulated, please take into consideration the following transition period. - Parts (except PDAP resin) for current model: 7 years - PDAP resin: Subject to indefinite application (requiring permanent exemption) - Spare parts for past model: Impossible (requiring permanent exemption)  JAMMA appreciates your consideration of our comments.    Toshihiko Tamura Senior Managing Director, Japan Agricultural Machinery Manufacturers Association Phone : +81 3 3433 0415 E-mail : tamura@jfmma.or.jp |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |
| 3529 | Date:  2021/12/14 10:49  Content:  Scope or restriction option analysis  Transitional period  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  ACEM - The Motorcycle Industry in Europe  Org. country:  Belgium  Attachment: | General Comments:  Please see the non-confidential attachment for more detailed comments. |
| Dossier submitter response: |
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| 3530 | Date:  2021/12/20 12:02  Content:  Scope or restriction option analysis  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  All Terrain Vehicle Industry European Association - ATVEA  Org. country:  Belgium  Attachment: | Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3531 | Date:  2021/12/21 15:27  Content:  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  Aerospace and Defence Industries Association of Europe (ASD)  Org. country:  Belgium  Attachment: | General Comments:  ASD would like to provide updated comments as well as responses to the questions raised by ECHA on the input submitted by ASD in July 2021. New parts in the document are marked as "NEW" and responses to the questions are included in the Annex 1. ASD thanks ECHA for their kind consideration and remains at disposal for further exchanges. |
| Answer to specific info request 1:  Please kindly refer to the document uploaded at the end of this consultation |
| Answer to specific info request 2:  Please kindly refer to the document uploaded at the end of this consultation |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3532 | Date:  2021/12/22 12:38  Content:  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  ACEA  Org. country:  Belgium  Attachment: | General Comments:  please see attachment |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3533 | Date:  2021/12/22 16:12  Content:  Scope or restriction option analysis  Information on alternatives  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  The European Garden Machinery Industry Federation – EGMF  Org. country:  Belgium  Attachment: | General Comments:  EGMF is the European federation representing major garden, landscaping, forestry and turf equipment manufacturers. Through its 30 European corporate members and 7 National Associations, EGMF represents about 18 million units placed on the European market every year, accounting for around 80% of garden machinery, and EGMF members employ over 120,000 people in the EU.  We welcome the opportunity to comment on the draft restriction proposal on 1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene (“Dechlorane Plus”™).  These substances are used to various applications in garden and outdoor power equipment, such as wire harness, adhesive, tape and grease. Their main functions are flame retardance and seizure resistance. They are widely used not only in the EU but also in other regions such as in Asia and in the USA. Until appropriate substitutes are found, these substances remain critical to guarantee the durability and safety of our equipment.  Therefore, we aim to share our key observations and asks on the restriction proposal: • To further assess the impact of the proposed restriction on specific types of machinery • To grant exemptions for applications and equipment where no appropriate substitute is available, including outdoor power equipment, as well as for spare parts to ensure that products could be repaired and reused and to provide safety products to consumers • To have sufficient time (7 years) to develop and test alternative substances, as other substances do not offer similar properties, thus not ensuring the necessary safety and durability of equipment. |
| Answer to specific info request 1:  There are many critical applications in the garden machinery sector for which Dechlorane Plus are essential. These substances are used due to their properties offering very good flame retardance and seizure resistance and cannot be easily substituted. Specific applications of Dechlorane Plus are polymers requiring flame retardance, and grease requiring seizure resistance: • Flame retardance: when Chlorine bond substance is heated, it emits the Chlorine. Chlorine replaces the oxide in the oxidation reaction thus stopping the fire. • Seizure resistance: when Chlorine bond substance is heated in contact with metals, it reacts with the metals and forms metal chloride film. This film reduces the friction. Other substances do not offer similar properties, thus not ensuring the necessary safety and durability of equipment. Therefore, we would require at least 7 years’ transitional period to ensure providing safety products to consumers. |
| Answer to specific info request 2:  There are many critical applications in the garden machinery sector for which Dechlorane Plus are essential. These substances are used due to their properties offering very good flame retardance and seizure resistance and cannot be easily substituted. Specific applications of Dechlorane Plus are polymers requiring flame retardance, and grease requiring seizure resistance: • Flame retardance: when Chlorine bond substance is heated, it emits the Chlorine. Chlorine replaces the oxide in the oxidation reaction thus stopping the fire. • Seizure resistance: when Chlorine bond substance is heated in contact with metals, it reacts with the metals and forms metal chloride film. This film reduces the friction. Other substances do not offer similar properties, thus not ensuring the necessary safety and durability of equipment. Therefore, we would require at least 7 years’ transitional period to ensure providing safety products to consumers. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
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| 3534 | Date:  2021/12/27 08:14  Content:  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  <redacted>  Org. country:  Japan  Company name confidential:  Yes  Attachment: | Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |

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| 3535 | Date:  2021/12/28 18:31  Content:  Scope or restriction option analysis  Information on benefits  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  The Marine Engine Committee (IMEC) of the International Council of Marine Industry Associations (ICOMIA)  Org. country:  Belgium  Attachment: | General Comments:  Dechlorane Plus provides a critical function as it is used as a flame retardant and as an anti-seize compound in products used in engines / powertrains in the marine leisure industry, including wire harnesses, adhesives, tape and grease for marine power equipment. They are widely used throughout the world – including in EU and in other regions such Asia and North America.  IMEC would like to share our key observations below and kindly requests that:  • An exemption to the proposed restriction is granted for use of these substances used on spare parts in our industry in order to ensure that products can be repaired, reused and remain safe for consumers  • Sufficient time is allowed, i.e. 5 years, to develop and test alternative substances which provide the necessary function  Justification: The current proposal to implement these restrictions for articles 18 months after publication in the Official Journal is not feasible for our industry, considering the broad and important usage of products containing Dechlorane Plus in our applications.  Dechlorane Plus is critical in specific applications, such as in polymers/articles where flame retardance is required, and in greases which resist seizure of parts during assembly and reassembly. Dechlorane plus functions as follows:  • Flame retardance: where Chlorine bond in the substance is heated, it emits Chlorine. Chlorine replaces the oxide in the oxidation reaction thus stopping the fire  • Seizure resistance: where Chlorine bond in the substance is heated in contact with the metals, it reacts with the metals and forms metal chloride film. This film reduces the friction.  Although uses of products / articles in EU containing Dechlorane Plus are gradually decreasing, non-EU regions still rely on its characteristic importance and use big volumes. Given the complexity of the global supply chains in our industry, an adequate transitional time, i.e. 5 years, is required to substitute all usages with alternative products which ensures safety, maintains the relevant functionality of products / articles and gives time for appropriate technical / regulatory approvals needed for use in our sector.  Moreover, we respectfully request that an indefinite derogation from the restriction is granted for use of products containing Dechlorane Plus on spare parts. This will ensure that products can be safely repaired and reused by customers. In line with the ‘repaired as produced’ principle enshrined in the EU RoHS Directive, we suggest adding a new exemption for:  "spare parts for the repair, reuse, updating of functionalities and upgrading of capacity of equipment placed on the market before (implementation date of this restriction)"  This amendment will bring substantial benefits to the environment and users and benefit a Circular economy as it will prevent additional generation of waste and the unnecessary use of more raw materials. It will enable operators to prolong the lifetime of their products without having to bear any additional costs due to the re-designing, re-testing and re-manufacturing of spare parts.  IMEC also associates and agrees with comments submitted in this consultation by The European Automobile Manufacturers’ Association (ACEA). |
| Answer to specific info request 1:  Dechlorane Plus provides a critical function as it is used as a flame retardant and as an anti-seize compound (critical in assembly /disassembly / component reuse) in products used in engines/powertrains in the marine leisure industry, e.g. wire harnesses, adhesives, tape and grease for marine power equipment. They are widely used throughout the world – including in EU and in other regions such Asia and North America. Typical concentrations in products used are : • 13-20%w/w in coating of electric wires • 20-25%w/w in grease De-chlorane plus brings substantial benefits to users and benefits a Circular economy as they facilitate reuse of components and prevent additional generation of waste and the unnecessary use of more raw materials. It enables operators to prolong the lifetime of their products without having to bear any additional costs due to the re-designing, re-testing and re-manufacturing of spare parts. |
| Answer to specific info request 2:  At this time (due to tie constraints associated with us preparing this input) we do not have information to submit on chemical / non-chemical alternatives but will seek to obtain this from our members. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |

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| 3536 | Date:  2022/01/03 19:45  Content:  Scope or restriction option analysis  Information on alternatives  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Company  Org. name:  Würth Elektronik eiSos GmbH & Co. KG  Org. country:  Germany  Attachment: | General Comments:  Certified electrical and flammability requirements will be impacted by the Dechlorane Plus restrictions.  Würth Elektronik is a world market leader in printed circuit boards and components and modules for controls, wireless data communication, energy-harvesting, power, smart metering, and wireless charging and discrete magnetic components including custom designed inductors and transformers. These products are used in consumer, industrial, automotive, and medical EEE to provide suppression and control of electromagnetic interference and emission, conversion, control, and transfer of electrical energy, signal and communications handling, integrated circuit application, and may otherwise be anywhere circuits are deployed in EEE.  Among the components most impacted by Dechlorane, those with certified electrical and flammability requirements, such as transformers and inductors, are expected to have the most complex and potentially challenging path of conversion away from Dechlorane. |
| Answer to specific info request 1:  We agree with proposals to support the planned obsolescence of the substance, trademark name Dechlorane, but it is important to recognise the lack of alternatives in the marketplace today. In certain applications it will not be possible to replace Dechlorane within a minimum of 5-7 years because materials and systems using alternatives to Dechlorane must be tested and successfully meet performance and safety tests relevant to each application. Even then, operational and commercial changes are required. Dechlorane is used as a thermoset plastic additive providing critical benefit in the electrical safety, flammability, and efficiency of electronic components and associated EEE end products. Safety characteristics currently conferred by Dechlorane prevent transfer of harmful electrical energy to users and articles and resist the start and propagation of fire. Efficiency characteristics relating to Dechlorane enable less mass of materials, less energy consumption, and less end-of-life waste. These characteristics are particularly important for electric vehicle drive motors, charging systems of all kinds, battery management, mains power management, and medical and heavy industrial equipment where failure can have severe consequences. Dechlorane’s successful performance over decades in thermoset plastic has enabled smaller, lighter, safe and reliable parts, fostering innovation across a broad range of markets stretching from green energy projects in alternative energy and smart metering to fast charging of electrical vehicles and complex control of automated products. |
| Answer to specific info request 2:  We have aimed to set out below some of the primary considerations relevant to replacement of Dechlorane by Würth Elektronik and its value chain to highlight the critical role of Dechlorane in EEE today and the challenges associated with its replacement. Due to the highly complex, technical, inter-related and, at this point, uncertain nature of any such activity, a detailed assessment of the impact of a broad restriction on use of Dechlorane is not possible. However, clearly it will be vital to understand and resolve critical dependencies and we would be happy to provide addition information or clarification to the extent we are able to support this consultation and process. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |

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| 3537 | Date:  2022/01/04 11:49\* (submission after the consultation deadline was agreed by ECHA)  Content:  Scope or restriction option analysis  Information on alternatives  Information on benefits  Other socio economic analysis (SEA) issues  Transitional period  Request for exemption  Type:  BehalfOfAnOrganisation  Org. type:  Industry or trade association  Org. name:  COCIR  Org. country:  Belgium  Attachment: | General Comments:  COCIR Members, in the medical imaging ans radiotherapy devices sector believe DP+ can be substituted succesfully with limited impacts to industry, innovation, healthcare providers in EU and patients is a proper transition period is granted and additional conditions are included in the restriction text, as argumented and proposed in the attached COCIR Report |
| Answer to specific info request 1:  DP+ has been included in BOMcheck afte the inclusion in the candidate list. BOMcheck, originally created by COCIR is today a very efficient system to track the use of substabces along the supply chain. COCIR managed to collect information about uses in medical imaging and radiotherapy devices but not about the quantities or concentrations as such information was not required by REACH article 33. the findings are included in the attached report. |
| Answer to specific info request 2:  COCIR does not exclude that the alternatives proposed in the DP+ restriction report may work in most applications but their use needs to be extensively tested for safety, reliability and clinical performances (e.g. interference with image quality). Additional information on possible alternatives and estimation of time required for substitution are reported in the attached report. |
| Dossier submitter response: |
| RAC Rapporteurs comments: |
| SEAC Rapporteurs comments: |