



Position paper

on the use of aluminosilicate wool (ASW) and its classification as substance of very high concern (SVHC).

Kanthal is the heating brand within Sandvik. Our lightweight construction has become the norm in many industrial and special non-standard furnaces with the use of high temperature insulation wools (HTIW) up to furnace temperatures of 1550°C. Our products based on ASW are the main group of products for specific and extraordinary high temperature applications.

The low thermal mass and respectively thermal conductivity of the ASW products used as furnace linings mean that you can build industrial furnaces which, depending on the type and mode of operation contribute significantly to energy saving, higher output and quality and better availability. Innovative products such as solar cells, non grain oriented steel, computer chips, special tools can be produced using ASW-products.

In the electrically heated furnaces, however, it is very expensive and time-consuming to combine ASW products, such as blankets or folding blocks, with electric heating elements. This has led to the product concept which we introduced to the market in 1978 under the trademark Fibrothal™ and Superthal™.

Today the Fibrothal and Superthal trademark covers a family of products consisting of vacuum-formed HTIW components, with or without electric heating elements.

Within Sandvik we convert yearly approx. 200 t ASW to vacuum-formed modules (Fibrothal).

Since 1978, long before the classification and regulation took place, we try to reduce the exposure of our employees to fibre dust. Therefore we took the following measures to reduce the exposition towards dust:

1. Optimization of production processes to reduce exposure
2. Investments in ventilation systems
3. Research for alternatives to ASW in our product portfolio
4. Application trainings with customers and users

These actions were always adjusted following the Regulation at the time. We see that adequate regulation is in place since 1997 and wonder why the REACH authorization process should be set-up in addition.

Health check's on a regular basis of every employee actively handling ASW with possible exposure are realized.

Within the 35 years of production at Walldorf (Germany), Hallstahammar (Sweden), Hosur (India) and Sakura (Japan), Sonora (USA) we had no indication of health impact on our employees. We have workers working since the beginning in 1978 with ASW in our facilities, without any concern. The ASW products are used in our processes for more than 35 years for the thermal process industry and until now no suitable replacement for this product has been found, despite extensive public and industrial research.



So-called alternatives like AES wool suffer from its limited application range (Temperature and Atmosphere). This is investigated and tested in different field tests. The end use defines the process characteristics and therefore a safety factor especially for product limitations have to be taken into account to prevent from serious industrial and laboratory injuries.

Most likely the production costs will be increase and therefore the European manufactures will have a location disadvantage against their Non-EU competitors.

As we understand the REACH authorization process the target is substitution or alternatively a safe use of classified substances by keeping the competitiveness of the European industry. On our practical experience an authorization process would not lead to more substitution of ASW products than was not realized in the last 2 decades nor improve worker protection related to our uses of these products.

So, where is the necessity for such a process?

Exempted from authorization:

All special lab and industrial furnace application above 800°C should be exempted from authorization to ensure safe use of the equipment and to prevent from worker protection issues resulting from so-called substitutes. Based on our practical experience worker protection is realized through existing regulation since many years and the use is adequately controlled. Beyond worker protection competitiveness for the European producers and users for our products should be kept by using ASW products to ensure employment in these areas.

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