

Call for evidence on the uses of five cobalt salts by industrial and professional workers

ECHA has been requested by the Commission to prepare an Annex XV restriction dossier according to Article 69(1) on the industrial and professional uses of five cobalt salts¹. The Commission request was received on 12/04/2017. ECHA intends to make an entry in the Registry of Intentions (RoI) in July 2017 with an anticipated submission date of 20 July 2018.

ECHA has carried out a study report² on the risks from certain uses of cobalt salts but additional information to define the scope of the potential restriction and support the impact assessment is needed. Therefore, in anticipation of the Annex XV restriction dossier preparation, ECHA is holding this call for evidence to gather concrete information on the following specific topics:

- a) Could you please provide information about the uses identified as intermediates by the REACH registrants in their registration dossiers³ or any other information you may be aware of about the use of these five cobalt salts as intermediates? We would like to know for each of the intermediate uses the chemical reaction in which the cobalt salts are used and the substances into which the cobalt salts are transformed. Additionally, please provide information on whether the manufacture of the cobalt salts and the synthesis of another substance(s) from those cobalt salts take place on the same site, i.e. whether the cobalt salts are used as on-site isolated intermediates or as transported intermediates.
- b) Please provide information on alternatives (including other cobalt compounds or other technology) for any industrial and professional use of the five cobalt salts and for each specific use or industrial sector. In case there are no available alternatives, it would be useful to receive information on the possible technical or economic difficulties for substitution (e.g. related to qualification of alternatives for safety critical uses), prices of alternative substances or technologies and other relevant information on substitution costs.
- c) The use of the cobalt salts in powder form presents a significantly higher potential exposure through inhalation to workers than other forms such as solution, granulates, etc. In this context, would a restriction on the use of cobalt salts in powder form have an impact (positive or negative) on your business (as a manufacturer, distributor, importer, SME, etc.)? Please provide specific information on the volumes of cobalt salts used in powder form and the costs and

1

https://www.echa.europa.eu/documents/10162/13641/commissions_request_cobalt_salt_en.pdf/d21c5c69-9640-47c5-9b36-40060590c17a

² https://echa.europa.eu/documents/10162/13641/cobalts_salts_study_report_en.pdf/42f0947f-e7fe-7b14-fc97-cfda0c068e9d

³ <https://echa.europa.eu/registration-dossier/-/registered-dossier/15094/3/1/4>
<https://echa.europa.eu/registration-dossier/-/registered-dossier/14346/3/1/4>
<https://echa.europa.eu/registration-dossier/-/registered-dossier/14964/3/1/4>
<https://echa.europa.eu/registration-dossier/-/registered-dossier/14925/3/1/4>
<https://echa.europa.eu/registration-dossier/-/registered-dossier/14769/3/1/4>

benefits that a restriction on the use of powder salts would present in your sector of activity taking into consideration the availability of alternatives.

- d) Do you consider the introduction of additional engineering measures in your plant for the handling of the cobalt salts, such as closed systems, increased automation, etc. as technically and economically feasible? Do you consider any other additional measure(s) to manage the proper use of these salts? Please provide specific information on the economic impacts the introduction of such engineering measures or any other measures may have had or would have in your specific sector of activity.
- e) For each of the five cobalt salts, please provide information on the volumes in use for the different sectors of activity and the trends in the last ten years as well as the future market demands expected for these substances.

Additional relevant information for the preparation of an Annex XV restriction dossier is also welcome, however, general information on the exposure for these five substances will also be taken from the available registration dossiers and if necessary these should be updated.

This call for evidence targets interested parties such as companies (manufacturers, suppliers, distributors, importers, etc. of cobalt salts and of the potential alternatives), trade associations, scientific bodies and any other stakeholders holding relevant information. Information can be submitted confidentially and will be treated as such by ECHA.

ECHA invites interested parties to respond to the call for evidence by 28 September 2017 by clicking here

https://comments.echa.europa.eu/comments_cms/CallForEvidence.aspx?RObjctId=4a98593c-12a6-498e-beff-c9a39077dc8b.

For any clarifications on the call for evidence, please contact: restriction@echa.europa.eu