



To whom it may concern

Yours	Our	SPM/TMcF	Direct	0161-785-	Date:	19 <sup>th</sup> July 2013
Ref:	Ref:	RW7908	Tel.No	1165		

Dear Sir or Madam:

My company has been involved in the plastic additives business for over 50 years, supplying stabilisers and co-stabilisers for plastic applications.

We supply these additives globally – and are familiar with the foamed plastics industry, both here in the UK and more widely in EU and Non-EU regions.

We support our customers in laboratory based technical service and plant trials aimed at the assessment of alternative additives.

For the ADCA, we have performed evaluations, which clearly demonstrate the inferior quality foamed products manufactured from currently available alternative chemical and physical approaches and believe that these will not be accepted as alternatives in the end market due to the technical deficiencies.

For some of the chemical alternatives, their toxicological profile is significantly worse than the ADCA and due to the inferior volume of gas generated, these would be used at higher addition levels.

We have never experienced any incidents of respiratory sensitisation, with respect to our laboratory use of ADCA. In fact the use of damped ADCA, would preclude this potential in any of our technical activities.

We also supply co-stabilisers which are used in combination with ADCA in other regions such as Asia and the US, where we would expect our business might grow due to the transfer of manufacture of ADCA based foamed plastic articles for re-import into the EU, if the proposed restrictions are imposed on the EU market.

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As an SME, we do not have the financial capability to support the authorisation of ADCA.

This is a disproportionate burden on industry –to manage a health hazard in the workplace, which is already controlled in the UK based on HSE requirements and the possibility to manage the workplace respiratory exposure with non-respirable forms such as damped or liquid dispersed ADCA.

Reach already also has mechanisms to control use and exposure through the Chemical Safety Report and communication of the Risk Management measures through the extended SDS.

We believe that the potential ban on ADCA will result the transfer of manufacture of foamed articles to none EU regions- for re-import into the EU.

This will be detrimental to EU manufacturing.

It will also possibly be detrimental to the health of EU workers, with the possible manufacture using alternative substances with a worse toxicological profile- if such new alternative could be found or ever made to produce articles of comparable quality.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S P Malcomson', with a long horizontal flourish extending to the right.

Mrs S P Malcomson  
Regulatory Affairs & Technical Manager  
*(this letter is electronically signed)*

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