





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', written over a horizontal line.

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

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