

The following companies are members of ESPA:

AKCROS Chemicals	AKDENIZ Kimya	ASUA
BAERLOCHER	CHEMSON Polymer-Additive AG	CHEMTURA
FLORIDIENNE Chimie	GALATA Chemicals	IKA
LAMBERTI	PMC Organometallic	REAGENS

20th September 2013

ESPA Input to the Public Consultation on the inclusion of azodicarbonamide (ADCA) in the Authorization List

The members of ESPA (European Stabiliser Producers Association) have been involved in the plastic additives business for many years, manufacturing and supplying stabilisers and packages for plastic applications. They supply these additives globally and are familiar with the foamed plastics industry, both in EU and non-EU regions. They support their customers in laboratory based technical service and plant trials aimed at the assessment of alternative additives.

For azodicarbonamide (ADCA), various ESPA members have performed evaluations, which clearly demonstrate the inferior quality of foamed products manufactured from currently available alternatives, both chemical and physical. They believe that these alternatives will not be accepted in the end market due to the technical deficiencies.

In addition, we wish to highlight the following:

- the toxicological profile of some chemical alternatives is significantly worse than ADCA. Therefore the use of these alternatives would be detrimental to the health of EU workers. Moreover due to the inferior volume of gas generated, these alternatives would need to be used at higher addition levels.
- ESPA members have never experienced any incidents of respiratory sensitisation with respect to the laboratory use of ADCA. In fact the use of non-dusty ADCA does preclude this potential.
- ESPA members also supply co-stabilisers which are used in combination with ADCA in other regions such as Asia and the US. Should ADCA be banned, it is to be expected that the co-stabilisers business would move out the EU, whilst the finished, foamed article would be re-imported.

- ESPA member companies, consisting essentially of SMEs, do not have the financial capability to support the authorisation of ADCA. This would be a disproportionate burden on industry to manage a health hazard in the workplace, which is in reality already controlled based on HSE requirements and by the use of non-respirable forms such as damped or liquid dispersed ADCA.

As a conclusion, a ban of ADCA is not expected to bring clear improvements on human health of workers while conducting to an evident loss of business for the EU and favouring imports of finished articles of globally unknown composition concerning other additives.

Ensuring that the well proven Risk Management Measures (RMM), applied since decades by the industry are implemented through the users of ADCA, appears to be the most effective and balanced option. This could very well be construed into a targeted restriction on the uses and RMMs when handling this substance.

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ESPA aisbl is affiliated to Cefic (The European Chemical Industry Council)

