

SECTION 3 : 3.2



H&S in Europe & REACH...

...all you need to know and how this will affect you

REACH places greater responsibility on industry to identify and manage the risks posed by chemicals to human health and the environment. Under this new legislation, both manufacturers/importers and downstream users have obligations to communicate uses and risks up and down the supply chain.

- Morgan Thermal Ceramics has registered the Superwool® fibres we manufacture and import into the EU as substances
- Morgan Thermal Ceramics is committed to meeting our legal obligations under REACH, as a manufacturer, supplier and downstream user
- All products imported or manufactured within the EU by Morgan Thermal Ceramics that meet the criteria for registration under REACH have been registered. This enables us to ensure that supply to customers is unaffected by the implementation of REACH
- Morgan Thermal Ceramics is also continuing to work closely with suppliers to ensure that the REACH process continues as smoothly as possible. We are communicating with suppliers to ensure that both our and our customers' uses are included in their registration documents

What is REACH?

Registration, Evaluation, Authorisation and Restriction of CHemicals

REACH is the new chemical regulation within the EU. It applies to the manufacture and import of all chemical substances that are placed on the market in quantities greater than 1 Tonne per year. It came into force on 1st June 2007 and replaces a number of European directives and regulations with a single system. Further information on REACH can be found on the European Chemicals Agency (ECHA) website http://echa.europa.eu/home_en.asp

We are also working with our suppliers to ensure that our raw materials are registered correctly to ensure continued supply of our other product ranges, including Tri-mor, monolithic refractories and insulating firebricks.

What is the REACH process?

REACH places greater responsibility on industry to identify and manage the risks posed by chemicals to human health and the environment. Under this new regulation, both manufacturers/importers and downstream users have obligations to communicate uses and risks up and down the supply chain.

Under REACH, all substances manufactured or imported in volumes greater than 1 Tonne p.a. must be registered and H&S advice must be supplied to downstream users in a standardised format. Thermal Ceramics fibre products, both RCF and AES were registered for REACH in 2010 and now have REACH compliant Safety Data Sheets (SDS).

Since RCF is classified as CLP 1b carcinogen, RCF products carry a CLP hazard warning label on the packaging.

What is authorisation?

The authorisation procedure aims to ensure that the risks from Substances of Very High Concern (SVHC) are properly controlled and that these substances are progressively replaced by suitable alternatives while ensuring the proper functioning of the EU internal market.

If a substance is subject to authorisation it will be placed on Annex XIV of the REACH regulation and a sunset date will be set beyond which the substance cannot be used, except in authorised applications. Prior to the sunset date, sufficient time (18 months) is allowed for those wishing to continue use to prepare and submit an application for authorisation. Applications may be authorised if there is no feasible alternative or the risk can be shown to be low.

Authorisation applies specifically to the use of the substance on its own or in mixtures. This includes the use of the substance in manufacturing articles. The application process requires a “cradle to grave analysis” of health risk and also a full analysis of why substitution is not possible. This is a very demanding requirement.

Prioritisation in Europe of Refractory Ceramic Fibres (RCF) for authorisation under REACH Regulation No. 1907/2006.

On June 24th 2013, the European Chemicals Agency (ECHA) published its fifth recommendation of substances to be placed on the REACH authorisation list (Annex XIV). This recommendation included both Alumina-Silica RCF and Zirconia-Alumina-Silica RCF. This means that if confirmed by the European Commission later in the year, the future use of RCF within the European Union will be subject to the authorisation process.

Following the publication of the ECHA's fifth recommendation, there was a public consultation period lasting three months. This has been completed and the results evaluated by the Member State Committee (MSC) in co-operation with the ECHA. This evaluation took longer than expected since there were a number of arguments raised in the public consultation questioning whether the quality of information to support RCF authorisation was adequate. On Feb 10th, the ECHA website confirmed the decision to refer the 5th recommendation, including RCF, to the European Commission for final review and decision. The earliest date for that decision is May 2014.

The decision to continue with the process by passing the 5th recommendation to the European Commission is supported on the ECHA website by a comprehensive document, entitled "Member State Committee Opinion". This can be obtained using the following link:

http://echa.europa.eu/de/view-article/-/journal_content/title/echa-propo

Once the decision to place RCF on Annex XIV has been confirmed by the European Commission, the following deadlines will apply:

21 months: Last Application Date for authorisation (LAD)

39 months: Sunset Date after which RCF may only be supplied into authorised applications.

Work has started to identify the scope of a future authorisation application for those furnace linings where RCF cannot currently be substituted. That is at an early stage and will be developed further while the European Commission decision is awaited.

Additional updates will be provided as and when new information becomes available. Thermal Ceramics is committed to maintaining close contact with its customers for RCF products during this period and will provide advice on progress with the authorisation process or the use of alternatives, as required. If you have any immediate concerns or need advice on the use and regulation of high temperature insulating fibres please contact your usual Thermal Ceramics technical sales person.