

## Comments and references to responses on ECHA's 6th Draft Recommendation for Pitch, coal tar, high temp. (EC number: 266-028-2)

*The present document compiles the comments received during the public consultation on the draft 6th recommendation for inclusion of substances in Annex XIV of REACH for Pitch, coal tar, high temp. (EC number: 266-028-2). The public consultation took place between 1 September and 1 December 2014. Some of the comments submitted contained additional attachment(s), accessible at [http://echa.europa.eu/documents/10162/13640/6th\\_rec\\_comref\\_attachments\\_CTPHT\\_en.zip](http://echa.europa.eu/documents/10162/13640/6th_rec_comref_attachments_CTPHT_en.zip). Those comments are indicated accordingly in the table below.*

*For each of the comments there is also a reference to specific section(s) of a document containing the responses to comments ("Response document", available at [http://echa.europa.eu/documents/10162/13640/6th\\_axiv\\_rec\\_response\\_doc\\_coal\\_stream\\_substances\\_en.pdf](http://echa.europa.eu/documents/10162/13640/6th_axiv_rec_response_doc_coal_stream_substances_en.pdf). The responses in the Response document are arranged by thematic block and level of information (see more detailed explanations at the beginning of that document).*

### PUBLIC VERSION

### CONTENT

|   |    |
|---|----|
| I - General comments on the recommendation to include the substance in Annex XIV .....              | 1  |
| II - Transitional arrangements. Comments on the proposed dates.....                                 | 15 |
| III - Comments on uses that should be exempted from authorisation, including reasons for that ..... | 19 |

### I - General comments on the recommendation to include the substance in Annex XIV

| Number / Date      | Submitted by (name, submitter type, country)     | Comment  | Reference to responses   |
|--------------------|--|--|--|
| 2547<br>2014/11/18 | Keminmaa community, Regional or local authority, | Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials. | <b>A.1.1. General, recommendation process:</b><br>5. New information and next steps towards the final recommendation |

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|                    | Finland  |   | <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>5. Availability of suitable alternatives</p>  |
| 2553<br>2014/11/19 | Keminmaa community, Regional or local authority, Finland | <p>Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.</p> <p>2553_Response to EU Commission open consultation_Keminmaa community.docx</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives<br/>7. Burden for industry and potential competitive disadvantage</p> <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> |

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| <p>2614<br/>2014/11/24</p> | <p>International Chromium Development Association, Industry or trade association, France</p> | <p>Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.</p>   | <p>Thank you for your comment. Please consider the responses to comment #2547 in section I.</p>  |
| <p>2661<br/>2014/11/26</p> | <p>Company, Germany</p>  | <p>TRIMET Aluminium SE refers to the statements of the European Aluminium Association (EAA) and their submitted supporting documents.</p> <p>Information about TRIMET Aluminium SE:</p> <ul style="list-style-type: none"> <li>• Independent and family-owned for more than 25 years</li> <li>• Germany's largest aluminium producer</li> <li>• 2,700 staff members in 8 locations – 6 in Germany</li> <li>• 3 aluminium smelters in Germany</li> <li>• 1 aluminium smelter in France</li> <li>• 700,000 to primary-, recycling and cast aluminium products p.a.</li> </ul> | <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b></p> <p>4. Control of risks<br/>5. Availability of suitable alternatives</p> <p>In addition, please consider the responses to comment #2881 in section I.</p>   |
| <p>2695<br/>2014/11/27</p> | <p>Outokumpu Stainless Ltd., Company, United Kingdom</p>                                     | <p>Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.</p> <p>Based on exposure facts and socioeconomic impacts for Europe our organization proposes to Exempt CTP use in metal and electrode production from authorization</p>  | <p><b>A.1.1. General, recommendation process:</b></p> <p>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b></p> <p>2. Aim &amp; proportionality of authorisation system -<br/>Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives<br/>7. Burden for industry and potential competitive disadvantage</p> |
|                            |  | <p>2661_2014-11-24 usage-coal-tar-pitch - TRIMET.pdf</p> <p>2695_Response to EU Commission CTP OSL.docx</p>   |  |

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|                            |                            |   | <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>  |
| <p>2700<br/>2014/11/27</p> | <p>Company,<br/>Sweden</p> | <p>Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.<br/>Based on exposure facts and socioeconomic impacts for Europe our organization proposes to</p> <ul style="list-style-type: none"> <li>• Remove CTP from final proposal or</li> <li>• Exempt CTP use in metal and electrode production from authorization more, see attachment</li> </ul> <p>2700_Outokumpu response to EU Commission open consultation 20141121.docx</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>2. Aim &amp; proportionality of authorisation system -<br/>Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives<br/>7. Burden for industry and potential competitive disadvantage</p> <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for</b></p> |

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|                    |   |   | <p><b>exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>   |
| 2705<br>2014/11/27 | Regional or local authority,<br>Finland       | Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.  | Thank you for your comment. Please consider the responses to comment #2547 in section I.  |
| 2709<br>2014/11/27 | Vesuvius Group,<br>Company,<br>United Kingdom | <p>Pitch, coal tar, high temp. is a very efficient substance for the impregnation of refractory products. Because of the high carbon ring content of its polyaromatic structure it also gives a high yield of graphitic carbon following pyrolysis - better than other pitch materials such as petroleum and significantly better than resin systems.</p> <p><i>Confidential attachment removed</i></p> | <p><b>A.1.1. General, recommendation process:</b></p> <p>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b></p> <ol style="list-style-type: none"> <li>1. Potential other regulatory actions</li> <li>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban</li> <li>3. Use specific scrutiny foreseen at application stage</li> <li>5. Availability of suitable alternatives</li> <li>7. Burden for industry and potential competitive disadvantage</li> </ol> <p><i>Responses referring to the confidential attachment removed.</i></p> |
| 2715<br>2014/11/27 | The CaC2-manufacturers consortium,            | <p>Scoring</p> <p>The substance Coal Tar Pitch, High Temperature (CTPHT, EC 266-028-2, CAS 65996-93-2) is recommended by ECHA for inclusion in Annex XIV (ECHA's 6th</p>  | <p><b>A.1.1. General, recommendation process:</b></p> <p>5. New information and next steps</p>  |

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| <p>Industry or trade association, Belgium</p> | <p>recommendation for inclusion of substances in Annex XIV). We note that the substance has been assigned the following priority scores: 15 point for inherent properties, 15 point for high tonnage and 12 points for Wide Dispersive Use (WDU).</p> <p>The combination of the score for volume and WDU seem unjustified. 87% of CTPHT is used industrially and corresponds to a WDU score of 5. The professional use is very low compared to the industrial use and an intermediate score for the combined industrial and professional use e.g. 7 seems appropriate. This would lead to a total score of <math>15 + 15 + 7 = 37</math>.</p> <p>CTPHT is mainly (87%) used as binding agent and electrode material. This (industrial) use accounts for about 650,000 tonnes per year out of the total estimated EU consumption of 750,000 tonnes per year.</p> <p>CTPHT is used in calcium carbide (CaC<sub>2</sub>) production with Søderberg electrodes that are formed and consumed at the CaC<sub>2</sub> production site. The manufacture of CaC<sub>2</sub> takes place in an electric arc furnace at very high temperature (ca. 2300°C). During the process CTPHT is fully consumed and contributes with carbon to the reaction:</p> $\text{CaO} + 3\text{C} \rightarrow \text{CaC}_2 + \text{CO}$ <p>The carbon in the electrodes (including carbon from CTPHT used as binding agent) mainly ends up as part of the end product (CaC<sub>2</sub>), and the rest leaves the process as CO. Due to the high process temperatures hydrocarbons present in the process are cracked.</p> <p>The use of CTPHT for production of CaC<sub>2</sub> is entirely an industrial end-use and there is no further use or exposure downstream as the substance is fully consumed. A high score for Wide Dispersive Use is therefore not applicable for CTPHT used in electrodes for CaC<sub>2</sub> production or for similar uses. The use of CTPHT in electrodes for other purposes than CaC<sub>2</sub> production will be addressed by the respective association.</p> <p>Thus, it can be concluded that the high score on Wide Dispersive Use is driven by a relatively small fraction of the total use of CTPHT, which is used</p> | <p>towards the final recommendation</p> <p><b>A.1.3. Prioritisation: Wide-dispersiveness of uses:</b></p> <ol style="list-style-type: none"> <li>1. Scope of the assessment of wide-dispersiveness of uses</li> <li>2. Assignment of WDU score based on use types and their associated volumes</li> </ol> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b></p> <ol style="list-style-type: none"> <li>1. Potential other regulatory actions</li> <li>4. Control of risks</li> <li>5. Availability of suitable alternatives</li> </ol> <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> |
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|                            |   | <p>professionally and in articles.</p> <p>As the industrial use is already strongly regulated by various EU regulations (see further), the need for further legal initiatives should be focused on the concern related to professional use and use in articles. We suggest separate strategies are considered for the 87% CTPHT used industrially and the 13% used professionally and in articles where exposure and release are more difficult to control.</p> <p>We suggest to consider:<br/>         1) Exemption of the 87% of the CTPHT used as binder in electrodes from authorisation according to REACH Article 58 (2)<br/>         2) Restriction of the use of CTPHT</p> <p>These options are discussed in the pdf attached.</p>  |  |
| <p>2771<br/>2014/11/28</p> | <p>WirtschaftsVereinigung Metalle,<br/>Industry or trade association,<br/>Germany</p> | <p>WirtschaftsVereinigung Metalle (WVM), the German Non-Ferrous Metals' Association, represents the German non ferrous (NF) metals industry towards politics and economy. We support our members in regulatory, occupational health &amp; safety affairs in order to maintain and establish measures at a very high level. Today, WVM has 660 member companies, including producers of Aluminium, where CTPHT is used. ompounds.</p> <p>In principle, we appreciate the involvement of stakeholders in the process of including substances in Annex XIV of REACH and would like to take the opportunity to bring our argumentation forward during this phase of internet consultation.</p> <p>We want to express the companies' awareness of their duties in safe handling hazardous substances and in establishing appropriate risk management measures. Industry also takes full responsibility to fulfil their obligations under the relevant Community and national legislation.</p> <p>Furthermore we support the comments submitted in this section by the European Aluminium Association and the German alumninium industry.</p> | <p>Please consider the responses to comments #2661 and #2881 in section I.</p> |

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| 2775<br>2014/11/28 | WKÖ,<br>Other contributor,<br>Austria              | See PDF attached.<br>2775_su_87_WKÖ Steinkohleteerpech.pdf  | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory actions<br/>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives<br/>7. Burden for industry and potential competitive disadvantage</p> |
| 2812<br>2014/11/28 | ACEA,<br>Industry or trade association,<br>Belgium | <p>ACEA does not support the proposal to authorise the use of Coal Tar Pitch under REACH Title VII, as this process increases the confusion over the viability of using this substance in the medium to long term.<br/>This uncertainty could affect key strategic decisions on whether to invest in European smelting operations, or to relocate to non-EU facilities.<br/>This could also have a negative effect on European R&amp;D, as well as making the EU more susceptible to price fluctuations.</p> <p>2812_20141128_Proposal for annex XIV recommendation on Coal Tar Pitch.pdf</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory actions<br/>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage</p>  |



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|  |  |  | <p>5. Availability of suitable alternatives<br/>6. Socio-economic benefits of continued use<br/>7. Burden for industry and potential competitive disadvantage</p> <p><b>A.2.8. Authorisation process increases the confusion over the viability of using substance in the medium to long term</b></p> <p><b>B.1.1. General principles for setting latest application dates / sunset dates:</b><br/>3. ECHA's proposal for latest application dates</p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br/>1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)<br/>2. Lack of alternatives, socio-economic aspects</p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> |
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|                    |  |  | <b>C.2.4. Request for an exemption for service parts of past models</b>  |
| 2834<br>2014/11/28 | Norway,<br>Member State  | The Norwegian CA supports the prioritisation of pitch, coal tar, high temp for inclusion in Annex XIV.   | Thank you for providing your opinion.  |
| 2881<br>2014/11/28 | European Aluminium Association,<br>Industry or trade association,<br>Belgium | <p>The European Aluminium Association (EAA) participates to the Public Consultation on the 6th Priority List for Coal Tar Pitch High Temperature on behalf of the primary aluminium industry in Europe.</p> <p>Coal tar pitch is used in the aluminum industry. The main usages are the following:</p> <ul style="list-style-type: none"> <li>• Prebake anode = 375 kt CTP/year</li> <li>• Søderberg anode or briquettes = 30 kt CTP/year</li> <li>• Ramming paste = 3.5 kt paste/year</li> <li>• Collar paste = 2.5 kt paste/year</li> </ul> <p><b>PRODUCTION OF ANODES</b></p> <p>The aluminium industry uses CTP for the production of anodes necessary for the electrolysis process, in either of the two existing technologies: prebake and Søderberg. There are some differences between the two processes, but in both cases CTP is only used at industrial level and is not contained in final aluminium products.</p> <p>Anodes are manufactured by mixing CTP and petrol coke and the former is converted into coke during the baking process, therefore there is no residual CTP in the anodes after baking. For this reason the CTP used for the production of anodes for the aluminium industry can be considered as an intermediate, not used under strictly controlled conditions, and therefore excluded from the authorization according to article 2(8) of the Reach regulation.</p> <p>In fact, we consider that the chemical composition here is more important than the shape as the coke is a fundamental requirement for the aluminium electrolysis process. The overall process reaction in the electrolysis cell is:<br/> <math>2Al_2O_3 + 3C = 4Al + 3CO_2</math>. Based on this anodes are considered as mixtures</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory actions<br/>4. Control of risks</p> <p><b>B.1.1. General principles for setting latest application dates / sunset dates</b><br/>3.ECHA's proposal for latest application dates</p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br/>1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p> <p><b>B.1.3. Review periods</b></p> |

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|                            |  | <p>before baking, and as a substance after baking, when the CTP is converted to coke.</p> <p><b>COLLAR PASTE AND RAMMING PASTE</b><br/>                 The aluminium industry is a downstream user of various pastes (hot and/or cold) like ramming paste and collar paste, in which CTP is one of the components in the mixture.<br/>                 These usages are in the scope of authorisation.</p> <p><b>GENERAL COMMENTS</b><br/>                 In general terms, most of the uses of CTP, and indeed all the uses in the aluminium sector, are limited to industrial facilities and are extensively regulated both in terms of environment and workers exposure. As a consequence, the exposure of the consumers is limited to minor non-industrial uses.</p> <p>As detailed in the section of the public consultation dealing with the socio-economic impacts of the authorisation procedure, the European aluminium industry proposes as best way forward to proceed with implementing at EU-level the existing legislative provisions covering the industrial uses of the substance, both in terms of environmental and health aspects.</p> <p>Note: this section is also present in the attached pdf, due to possible loss of formatting in this text field.</p> <p>2881_EAA - Authorisation public consultation - ECHA - final 28112014.pdf</p> | <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p>   |
| <p>2945<br/>2014/11/30</p> | <p>German Refractory Association, Industry or trade association, Germany</p> | <p>The production capacity/output of the members of the German Refractory Association (VDFFI) represents about 70% of the total amount of refractory products manufactured in Germany and about 25% of the European refractory production.</p> <p>Since many years, the refractory industry strives for the replacement of Coal tar pitch high temperature (CTPHT) by alternative substances. This goal has been accomplished for many refractory products.<br/>                 CTPHT is only used for refractory products for the steel industry, in cases, where these are essential to a safe production.<br/>                 For safety reasons, the steel industry cannot do without CTPHT containing</p>  | <p><b>A.1.1. General, recommendation process:</b><br/>                 5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>                 3. Use specific scrutiny foreseen at application stage<br/>                 5. Availability of suitable alternatives</p> |

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|                            |  | <p>refractory products.<br/>CTPHT is used as a binder for tap hole clay, ramming mixes and gunning mixes, without which a safe operation of blast furnaces will not be possible. CTPHT is also used for the impregnation of refractory bricks and slide plates for the safe operation of converters.</p> <p>The annual consumption of CTPHT in Europe for the manufacturing of refractory products is less than 6000 t.</p> <p>Furthermore, an authorisation of CTPHT will not cause any improvement in safety at work.<br/>CTPHT is essential to the steel industry to ensure a safe production which, in consequence, also allows for a proper labour protection.<br/>Bricks and slide plates are articles which can be imported without any authorisation requirements. This leads to massive competitive disadvantages for the European manufacturers of these articles.</p>   | <p>7. Burden for industry and potential competitive disadvantage</p>   |
| <p>2976<br/>2014/12/01</p> | <p>Outokumpu,<br/>Company,<br/>Finland</p> | <p>Outokumpu is a European stainless steel company with a global presence, operating in more than 40 countries, head office in Finland and employing more than 12,500 people. The largest stainless steel mills are located at its Tornio site (Finland), in Sweden, Germany, the UK and USA. Coal Tar Pitch, high temperature (CTPHT) is critical for our ferrochromium business that provides our stainless steel melt shops with this vital raw material. Outokumpu is the largest European producer of ferrochrome (FeCr). At its Tornio (Finland) site, the FeCr production is integrated with the largest stainless steel mill in Europe.</p> <p>CTPHT is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTPHT. We are in constant discussions with our suppliers concerning the development of our processes, which includes evaluation of alternative substances</p> <p>CTPHT is essential as binder in electrodes which melt ore / metal, also in many furnace wall mass materials.</p> <p>CTPHT was identified as a Substance of Very High Concern (SVHC) according to article 57 a, d and e of Regulation (EC) No 1907/2006 (REACH) and was</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory actions<br/>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives</p> <p><b>A.2.5. Disputing SVHC</b></p> |

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|                            |   | <p>therefore included in the Candidate List for authorisation on 13 January 2010, following ECHA's decision ED/68/2009.</p> <p>CTPHT is classified in Annex VI, part 3, Table 3.1 (the list of harmonised classification and labelling of hazardous substances) of Regulation (EC) No 1272/2008 as Carcinogenic, Category 1B, H350 ("May cause cancer").</p> <p>However this classification at these concentration levels in mixtures may be questioned since it has been shown in comprehensive studies that there is no indication of genotoxicity of CTPHT in our use [Ref. 1]. (see below). In fact IARC specifically points out that CTPHT as encountered in paving and roofing causes cancer of the lung, and that CTPHT has a genotoxic mechanism of action. [Ref. 2]</p> <p>CTPHT is a substance which has already been thoroughly assessed and where recommendations for actions to reduce risk already are in place.</p> <p>CTPHT has been the subject of an EU Risk Assessment under EINECS and with a Risk Assessment report written by RIVM [Ref. 3] on behalf of the Netherlands authorities. The report gives recommendations for risk management measures, which are considered adequate for controlling the risk identified in this report.</p> <p>Based on the recommendations given here we see no reason for taking CTPHT any further towards an Authorisation process but rather to work along RMOs and/or OELs. There is no exposure on CTPHT from our closed processes and there is no CTPHT in final products.</p> <p>Additionally the production process of ferrochromium with CTPHT is known globally as the most efficient and environmentally friendly and as best available technology (BAT) [Ref. 4].</p> | <p><b>identification/classification</b></p>  |
| <p>3000<br/>2014/12/01</p> | <p>cefic "Coal Chemicals Sector Group (CCSG)",<br/>Industry or trade association,<br/>Belgium</p> | <p>2976_Consultation response articles.zip</p> <p>All comments submitted by cefic "Coal Chemicals Sector Group" representing all European pitch, coal tar, high temp. producers is compiled in one attachment.<br/>Best regards<br/>Winfried Boenigk<br/>Chairman CCSG</p>  | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> |

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|                            |   | <p>3000_CCSG for ECHA CTPHT PC 141201.pdf</p>  | <p><b>A.1.2. Prioritisation: Volume</b></p> <p><b>A.2.2. Information on pitch, coal tar, high temp. on uses and volumes per uses / Volumes are lower than the ones reported in the Background document</b></p> <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>B.1.1. General principles for setting latest application dates / sunset dates</b><br/>         3.ECHA’s proposal for latest application dates</p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br/>         1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p> <p><b>C.1.2. Generic exemptions</b></p> |
| <p>3008<br/>2014/12/01</p> | <p>Cerame-Unie - the European Ceramics Industry Association, Industry or trade association, Belgium</p> | <p>The European Ceramic Industry, Cerame-Unie, covers a wide range of products including brick &amp; roof tiles, clay pipes, wall &amp; floor tiles, refractory products, sanitary ware, table &amp; decorative ware, technical ceramics, abrasives and enamels. It accounts for more than 200.000 direct employments and a turnover of € 25 billion within the EU.</p> <p>Coal tar pitch high temperature (CTP, ht) is used in a number of refractory</p> | <p><b>A.1.1. General, recommendation process:</b><br/>         5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA’s prioritisation:</b></p>   |

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|                    |   | <p>applications. It is used as a binder in the production of tap hole paste. It is also used to impregnate special high temperature refractory bricks, which are articles according to the REACH definition.</p> <p>These applications are restricted to industrial applications. There is therefore no consumer exposure.</p> <p>The use of CTP, ht has been substituted where possible. For some applications such as some impregnated refractory bricks there is no substitute which can deliver the same performance.</p> <p>Impregnated refractory bricks that are imported in the EU show the same hazard profile and are not covered by the REACH authorisation process. This creates an uncompetitive situation for the EU industry.</p> <p>Cerame-Unie shares the comments made by the Coal Chemical Sector Group (CCSG), the European Steel Association (Eurofer) as well as the comments provided by the Wirtschaftskammer Österreich (WKO).</p> | <p>3. Use specific scrutiny foreseen at application stage</p> <p>5. Availability of suitable alternatives</p> <p>Please see the following responses in the responses to comments document:</p> <p>7. Burden for industry and potential competitive disadvantage</p> <p>In addition, please consider the responses to comments #2775 and #3000 in section I.</p> |
| 3015<br>2014/12/01 | The Federation of Finnish Technology Industries, Industry or trade association, Finland | Coal tar pitch, high temperature (CTP) is widely used in metal industry and there is no alternative available for CTP. CTP is essential in electrodes which melt metal and as well as in many furnace wall mass materials.  | Thank you for your comment. Please consider the responses to comment #2553 in section I.  |

**II - Transitional arrangements. Comments on the proposed dates**

| Number / Date      | Submitted by (name, submitter type, country)             | Comment  | Reference to responses   |
|--------------------|--|--|--|
| 2553<br>2014/11/19 | Keminmaa community, Regional or local authority, Finland | 2553_Response to EU Commission open consultation_Keminmaa community.docx | <b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b> |

|                    |   |   |   |
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|                    |   |   | <p>2. Lack of alternatives, socio-economic aspects</p> <p>In addition, please consider the responses to your comment #2553 in section I.</p>  |
| 2661<br>2014/11/26 | Company,<br>Germany                                     | <p>The application date and sunset date should take in consideration the complexity of the supply chain, different uses and the many players involved. Based on this TRIMET Aluminium SE proposes a LAD of 24 months in case CTPHT has to go through authorisation.</p> | <p><b>B.1.1. General principles for setting latest application dates / sunset dates:</b></p> <p>2. ECHA's proposal for sunset dates</p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b></p> <p>1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p> <p>In addition, please consider the responses to your comment #2661 in section I.</p> |
|                    |   | <p>2661_2014-11-24 usage-coal-tar-pitch - TRIMET.pdf</p>  |   |
| 2695<br>2014/11/27 | Outokumpu Stainless Ltd.,<br>Company,<br>United Kingdom | No comments   | Please consider the responses to your comment #2695 in section I.   |
|                    |   | 2695_Response to EU Commission CTP OSL.docx   |   |
| 2700<br>2014/11/27 | Company,<br>Sweden                                      | -   | Please consider the responses to your comment #2700 in section I.   |
|                    |   | 2700_Outokumpu response to EU Commission open consultation 20141121.docx  |   |



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| 2709<br>2014/11/27 | Vesuvius Group,<br>Company,<br>United Kingdom                                   | <i>Confidential attachment removed</i>   | Please consider the responses to your comment #2709 in section I.   |
| 2715<br>2014/11/27 | The CaC2-manufacturers consortium,<br>Industry or trade association,<br>Belgium | <p>The European CaC2-manufacturers would strongly recommend a period of 24 months between the listing on the authorisation list and the LAD. This period of 24 months is justified by the complexity of an authorisation dossier including a socio-economic analysis should CTPHT be listed on the authorisation list. Indeed such a dossier is highly technical and requires time for collecting all relevant and up-to-date data on exposure as well as on socio-economic topics.</p> <p>2715_20141127 - -Part A-Addi Non-confidential Info.pdf<br/><i>Confidential attachment removed</i></p> | <p><b>B.1.1. General principles for setting latest application dates / sunset dates:</b><br/>3. ECHA's proposal for latest application dates</p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br/>1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p> <p>In addition, please consider the responses to your comment #2715 in section I.</p> |
| 2771<br>2014/11/28 | WirtschaftsVereinigung Metalle,<br>Industry or trade association,<br>Germany    | Also in this respect WVM supports the arguments brought forward.   | Please consider the responses to your comment #2771 in section I.   |
| 2775<br>2014/11/28 | WKÖ,<br>Other contributor,<br>Austria   | <p>See PDF attached.</p> <p>2775_su_87_WKÖ Steinkohleteerpech.pdf</p>  | Please consider the responses to your comment #2775 in section I.   |
| 2812<br>2014/11/28 | ACEA,<br>Industry or trade association,<br>Belgium                              | <p>Industry proposes the establishment of a Community wide OEL for benzo(a)pyrene, which would properly address the concerns raised regarding exposure of aluminium workers in the smelting industry.</p> <p>This was also recommended as the most suitable measure in the Risk Reduction</p>  | <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory</p>   |

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|                    |  | Strategy from the EU Risk Assessment Report, conducted by Netherlands in 2007/8.  | actions<br>4. Control of risks  |
|                    |  | 2812_20141128_Proposal for annex XIV recommendation on Coal Tar Pitch.pdf   | In addition, please consider the responses to your comment #2812 in section I.  |
| 2834<br>2014/11/28 | Norway,<br>Member State  | In general, we are in favour that a regulation should enter into force as soon as possible. Hence we are in favour of the shortest LAD slot.  | <b>B.1.1. General principles for setting latest application dates / sunset dates:</b><br>3. ECHA's proposal for latest application dates  |
| 2881<br>2014/11/28 | European Aluminium Association,<br>Industry or trade association,<br>Belgium | The application date and sunset date should take in consideration the complexity of the supply chain, different uses and the many players involved. Based on this industry proposes a LAD of 24 months in case CTPHT has to go through authorisation. | <b>B.1.1. General principles for setting latest application dates / sunset dates:</b><br>2. ECHA's proposal for sunset dates<br><br><b>B.1.1. General principles for setting latest application dates / sunset dates</b><br>3.ECHA's proposal for latest application dates<br><br><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br>1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high |
|                    |  | 2881_EAA - Authorisation public consultation - ECHA - final 28112014.pdf  |   |

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|                    |   |  | number of users)<br><br>In addition, please consider the responses to your comment #2881 in section I.  |
| 2976<br>2014/12/01 | Outokumpu,<br>Company,<br>Finland   | 2976_Consultation response articles.zip                        | Please further consider the responses to your comment #2976 in section I.   |
| 3000<br>2014/12/01 | cefic "Coal Chemicals Sector Group (CCSG)",<br>Industry or trade association,<br>Belgium      | see general comments<br>3000_CCSG for ECHA CTPHT PC 141201.pdf | Please consider the responses to your comment #3000 in section I.   |
| 3015<br>2014/12/01 | The Federation of Finnish Technology Industries,<br>Industry or trade association,<br>Finland | There are no alternatives available                            | <b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates:</b><br>2. Lack of alternatives, socio-economic aspects<br><br>In addition, please consider the responses to your comment #3015 in section I. |

**III - Comments on uses that should be exempted from authorisation, including reasons for that**

| Number / Date      | Submitted by (name, submitter type, country)                   | Comment   | Reference to responses                                       |
|--------------------|--|---|--|
| 2547<br>2014/11/18 | Keminmaa community,<br>Regional or local authority,<br>Finland | Based on exposure facts and socioeconomic impacts for Europe Keminmaa community proposes to <ul style="list-style-type: none"> <li>Remove CTP from final proposal or</li> <li>Exempt CTP use in metal and electrode production from authorization.</li> </ul> | Please consider the responses to comment #2553 in section I. |

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|  |  | <p>General socioeconomic reasons:<br/> A proposed authorization (=ban) would have severe consequences. The EU area would become dependent on import of metal melting electrodes (e.g. from China and Russia). Ferrochromium is used as alloying element in steel; mainly stainless steel. CTP is not present in the ferrochrome, but it is essential in the production process. Without CTP, the EU would become totally dependent on imports for chromium (ferrochromium), which has been defined by the European Commission as one of the most economically important metals and as a critical raw material. This situation would be against many other strategic targets set by EC on welfare, industry and work places.</p> <p>Threat of losing work places has many negative socioeconomic impacts in Kemi - Tornio region in which Keminmaa community is located. Outokumpu is the largest ferrochromium producer in the EU and the Kemi mine the only one operative chromium mine in Europe. Outokumpu is also the biggest private sector employer in Kemi -Tornio region. According to our knowledge about Outokumpu ´s chrome ore, FeCr and stainless steel production in Finland (Kemi-Tornio production units) the ban of CTP would be very serious. The Kemi mine and ferrochrome operations are an integral part of the Tornio stainless steel mill which serves the entire Outokumpu operations. Without CTP containing materials the process does not work and the FeCr plant would have to close, Without FeCr production also the stainless steel production and the mine would become unprofitable. This would directly affect about 2500 employees in the northern Finland region. With indirect effects, up to 9 000 jobs could be lost in Finland alone. This situation would create a mass unemployment and severe economic and welfare difficulties in Kemi - Tornio region.</p> <p>Exposure reasons in case of Outokumpu / FeCr process:</p> <p>Outokumpu type furnaces and FeCr processes are described well in public available environmental permits (in Finnish) and the exposures studied in many publicly available documents. In these documents there is clear evidence that no external exposure on CTP / PAH occur. Outokumpu only uses CTP in closed processes. The electrode paste is used as briquettes or cylinders, solid in room temperature and covered with plastic packaging (no dust or fume). The CTP compounds are burdened and the exhaust gas, consisting mainly of CO is collected and used as fuel in other processes or in the power plant. There is no CTP in ferrochrome, which is the</p> |  |
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|                            |   | <p>manufactured product. It's known that independent and systematic surveys has been done of health effects of exposure to compounds connected with FeCr production since the 1970s in Kemi-Tornio production chain.</p> <p>In conclusion, the study indicated that an average exposure time of 23 years in modern ferrochromium and stainless steel production with low occupational exposures does not lead to adverse respiratory changes detectable by lung function tests or radiography. Among the published studies is also an independently-funded cancer study that strongly indicates there is no added risk of cancer to individuals working in the steel mills and the ferrochromium plant. As CTP is used in a closed process, it does not cause emissions into air and water.</p> <p>Based on all facts described Keminmaa community appeals very strongly to remove CTP from final proposal or exempt CTP use in metal and electrode production from authorization.</p> |  |
| <p>2553<br/>2014/11/19</p> | <p>Keminmaa community,<br/>Regional or local authority,<br/>Finland</p> | <p>2553_Response to EU Commission open consultation_Keminmaa community.docx</p>  | <p>Please consider the responses to your comment #2553 in section I.</p> |
| <p>2586<br/>2014/11/24</p> | <p>City of Kemi,<br/>Regional or local authority,<br/>Finland</p>       | <p>Based on exposure facts and socioeconomic impacts for Europe City of Kemi proposes to: 1) remove CTP from the final proposal or 2) exempt CTP use in metal and electrode production from authorization.</p> <p>General socioeconomic reasons:<br/>A proposed authorization (=ban) would have serious consequences. The EU area would become dependent on import of metal melting electrodes (e.g. from China and Russia). Ferrochromium is used as alloying element in steel; mainly stainless steel. CTP is not present in the ferrochrome, but it is essential in the production process. Without CTP, the EU would become totally dependent on imports for chromium (ferrochromium), which has been defined by the European Commission as one of the most economically important metals and a critical raw material. This situation would be against many other strategic targets set by EC on welfare, industry and work places.</p>  | <p>Please consider the responses to comment #2553 in section I.</p>      |

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|  |  | <p>Threat of losing work places has many negative socioeconomic impacts in Kemi - Tornio region in which City of Kemi is located. Outokumpu is the largest ferrochromium producer in the EU and the Kemi mine the only operative chromium mine in Europe. Outokumpu is also the biggest private sector employer in Kemi - Tornio region. According to our knowledge about Outokumpu´s chrome ore, FeCr and stainless steel production in Finland (Kemi-Tornio production units) the ban of CTP would be very serious. The Kemi mine and ferrochrome operations are an integral part of the Tornio stainless steel mill which serves the entire Outokumpu operations. Without CTP containing materials the process does not work and the FeCr plant would have to close. Without FeCr production also the stainless steel production and the mine would be unprofitable. This would directly affect about 2500 employees in the northern Finland region. With indirect effects, up to 9000 jobs could be lost in Finland alone. This situation would create a mass unemployment and severe economic and welfare difficulties in Kemi - Tornio region.</p> <p>Exposure reasons in case of Outokumpu / FeCr process:<br/>         Outokumpu type furnaces and FeCr processes are described well in public available environmental permits (in Finnish) and the exposures studied in many publicly available documents. In these documents there is a clear evidence that no external exposure on CTP / PAH occur. Outokumpu only uses CTP in closed processes. The electrode paste is used as briquettes or cylinders, solid in room temperature and covered with plastic packaging (no dust or fume). The CTP compounds are burdened and the exhaust gas, consisting mainly of CO is collected and used as fuel in other processes or in the power plant. There is no CTP in ferrochrome, which is the manufactured product. It is known that independent and systematic surveys has been done of health effects of exposure to compounds connected with FeCr production since 1970s in Kemi-Tornio production chain.</p> <p>In conclusion, the study indicated that an average exposure time of 23 years in modern ferrochromium and stainless steel production with low occupational exposures does not lead to adverse respiratory changes detectable by lung function that strongly indicates there is no added risk of cancer to individuals working in the steel mills and the ferrochromium plant. As CTP is used in a closed processes, it does not cause emissions into air and water.</p> <p>Based on all facts described the City of Kemi appeals very strongly to remove CTP from final proposal or exempt CTP use in metal and electrode production from</p> |  |
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|                    |   | authorization.   |  |
| 2614<br>2014/11/24 | International Chromium Development Association, Industry or trade association, France | <p>Based on exposure facts and socioeconomic impacts for Europe our organization proposes to</p> <ul style="list-style-type: none"> <li>• Remove CTP from final proposal or</li> <li>• Exempt CTP use in metal and electrode production from authorization</li> </ul> <p>General socioeconomic reasons:<br/> A proposed authorisation (=ban) would have severe consequences. The EU area would become dependent on import of metal melting electrodes (e.g. from China and Russia). In metal industry the electrodes are essential. This situation would be against many other strategic targets set by EC on welfare, industry and work places. Some metal manufacturing processes that are continuous in nature are even more dependent on CTP, e.g. ferrochrome (FeCr) would not be possible to produce in the best and the most efficient type of furnaces (so called Outokumpu / Outotec furnaces).<br/> Outokumpu is the largest ferrochromium producer in the EU and the Kemi mine the only one operative chromium mine in Europe. Ferrochromium is used as alloying element in steel; mainly stainless steel. CTP is not present in the ferrochrome, but it is essential in the production process. Without CTP, the EU would become totally dependent on imports for chromium (ferrochromium), which has been defined by the European Commission as one of the most economically important metals and as a critical raw material. (Report on critical raw materials for the EU, DG ENTR May 2014 - <a href="http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf">http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf</a>)<br/> According to our knowledge about Outokumpu ´s chrome ore, FeCr and stainless steel production in Finland (Kemi-Tornio production units) the ban of CTP would be very serious. The Kemi mine and ferrochrome operations are an integral part of the Tornio stainless steel mill which serves the entire Outokumpu operations. Without CTP containing materials the process does not work and the FeCr plant would have to close, Without FeCr production also the stainless steel production and the mine would become unprofitable. This would directly affect about 2500 employees in the northern Finland region. With indirect effects, up to 9 000 jobs could be lost in Finland alone.<br/> Exposure reasons in case of Outokumpu / FeCr process:<br/> Outokumpu type furnaces and FeCr processes are described well in public available environmental permits (in Finnish) and the exposures studied in many publicly available documents. In these documents there is clear evidence that no external</p> | Please consider the responses to comment #2695 in section I. |

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|                    |  | <p>exposure on CTP / PAH occur. Outokumpu only uses CTP in closed processes. The electrode paste is used as briquettes or cylinders, solid in room temperature and covered with plastic packaging (no dust or fume). The CTP compounds are burdened and the exhaust gas, consisting mainly of CO is collected and used as fuel in other processes or in the power plant. There is no CTP in ferrochrome, which is the manufactured product.</p> <p>It's known that independent and systematic surveys has been done of health effects of exposure to compounds connected with FeCr production since the 1970s in Kemi-Tornio production chain. For example research in the effects to respiratory health in the stainless steel industry, including the FeCr production (Huvinen M, Uitti J, Oksa P, et al. Respiratory health effects of long-term exposure to different chromium species in stainless steel production. Occup Med 2002;52:203-12). In conclusion, the study indicated that an average exposure time of 23 years in modern ferrochromium and stainless steel production with low occupational exposures does not lead to adverse respiratory changes detectable by lung function tests or radiography.</p> <p>Among the published studies is also an independently-funded cancer study that strongly indicates there is no added risk of cancer to individuals working in the steel mills and the ferrochromium plant (Huvinen M, Pukkala E. Cancer incidence among Finnish ferrochromium and stainless steel production workers in 1967-2011: a cohort study. BMJ Open 2013;3:e003819-doi:10.1136/bmjopen-2013-003819).</p> <p>As CTP is used in a closed process, it does not cause emissions into air and water.</p> |   |
| 2661<br>2014/11/26 | Company,<br>Germany  | <p>We refer to the statements of the European Aluminium Association (EAA) and their submitted supporting documents.</p> <p>2661_2014-11-24 usage-coal-tar-pitch - TRIMET.pdf</p>   | Please consider the responses to comments #2881 and #2661 in section I. |
| 2695<br>2014/11/27 | Outokumpu Stainless<br>Ltd.,<br>Company,<br>United Kingdom | <p>Metal and electrode production, including carbon, high alloy and stainless steel production. Also production of ferro-alloys such as ferro chrome, ferro nickel and ferro molybdenum</p> <p>2695_Response to EU Commission CTP OSL.docx</p>   | Please consider the responses to your comment #2695 in section I.       |
| 2700<br>2014/11/27 | Company,<br>Sweden   | <p>Coal tar pitch, high temperature (CTP) is used widely in metal industry and according to our knowledge there are no alternative or replacement possibilities for CTP. CTP is essential in electrodes which melt ore / metal, also in many furnace wall mass materials.</p> <p>Based on exposure facts and socioeconomic impacts for Europe our organization proposes to</p>   | Please consider the responses to your comment #2700 in section I.       |



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|                            |   | <ul style="list-style-type: none"> <li>• Remove CTP from final proposal or</li> <li>• Exempt CTP use in metal and electrode production from authorization more, see attachment</li> </ul> <p>2700_Outokumpu response to EU Commission open consultation 20141121.docx</p>   |  |
| <p>2705<br/>2014/11/27</p> | <p>Regional or local authority,<br/>Finland</p> | <p>Based on exposure facts and socioeconomic impacts for Europe our organization proposes to</p> <ul style="list-style-type: none"> <li>• Remove CTP from final proposal or</li> <li>• Exempt CTP use in metal and electrode production from authorization.</li> </ul> <p>General socioeconomic reasons:</p> <p>A proposed authorisation (=ban) would have severe consequences. The EU area would become dependent on import of metal melting electrodes (e.g. from China and Russia). In metal industry the electrodes are essential. This situation would be against many other strategic targets set by EC on welfare, industry and work places. Some metal manufacturing processes that are continuous in nature are even more dependent on CTP, e.g. ferrochrome (FeCr) would not be possible to produce in the best and the most efficient type of furnaces (so called Outokumpu / Outotec furnaces).</p> <p>Outokumpu is the largest ferrochromium producer in the EU and the Kemi mine the only one operative chromium mine in Europe. Ferrochromium is used as alloying element in steel; mainly stainless steel. CTP is not present in the ferrochrome, but it is essential in the production process. Without CTP, the EU would become totally dependent on imports for chromium (ferrochromium), which has been defined by the European Commission as one of the most economically important metals and as a critical raw material. (Report on critical raw materials for the EU, DG ENTR May 2014 - <a href="http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf">http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf</a>)</p> <p>According to our knowledge about Outokumpu´s chrome ore, FeCr and stainless steel production in Finland (Kemi-Tornio production units) the ban of CTP would be very serious. The Kemi mine and ferrochrome operations are an integral part of the Tornio stainless steel mill which serves the entire Outokumpu operations. Without CTP containing materials the process does not work and the FeCr plant would have</p> | <p>Please consider the responses to comments #2553 and #2695 in section I.</p> |

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|  |  | <p>to close, Without FeCr production also the stainless steel production and the mine would become unprofitable. This would directly affect about 2500 employees in the northern Finland region. With indirect effects, up to 9 000 jobs could be lost in Finland alone.</p> <p>The Town of Tornio has over 9000 working places in which one third is directly based on industry. Outokumpu with its local companies (Outokumpu Shipping, Outokumpu Chrome, Outokumpu Stainless, Kemi Mine) is the biggest and most important employee in the whole Kemi-Tornio-Haparanda region. If Outokumpu companies are forced to drive down in the future that would create a mass unemployment and severe socio-economical difficulties in Kemi-Tornio region. The Kemi-Tornio region has already today unemployment rate around 16-17 % and its business profile is industrial based.</p> <p>Exposure reasons in case of Outokumpu / FeCr process:<br/>         Outokumpu type furnaces and FeCr processes are described well in public available environmental permits (in Finnish) and the exposures studied in many publicly available documents. In these documents there is clear evidence that no external exposure on CTP / PAH occur. Outokumpu only uses CTP in closed processes. The electrode paste is used as briquettes or cylinders, solid in room temperature and covered with plastic packaging (no dust or fume). The CTP compounds are burdened and the exhaust gas, consisting mainly of CO is collected and used as fuel in other processes or in the power plant. There is no CTP in ferrochrome, which is the manufactured product.</p> <p>It´s known that independent and systematic surveys has been done of health effects of exposure to compounds connected with FeCr production since the 1970s in Kemi-Tornio production chain.</p> <p>In conclusion, the study indicated that an average exposure time of 23 years in modern ferrochromium and stainless steel production with low occupational exposures does not lead to adverse respiratory changes detectable by lung function tests or radiography. Among the published studies is also an independently-funded cancer study that strongly indicates there is no added risk of cancer to individuals working in the steel mills and the ferrochromium plant.</p> <p>As CTP is used in a closed process, it does not cause emissions into air and water.</p> <p>Based on all facts described Tornio town appeals very strongly to remove CTP from</p> |  |
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|                    |  | final proposal or exempt CTP use in metal and electrode production authorization.  |  |
| 2709<br>2014/11/27 | Vesuvius Group,<br>Company,<br>United Kingdom  | <p>Since coal tar pitch, high temp. has been identified as a hazardous substance for many years, the use of this substance to impregnate slide gate plates and other refractory shapes for use in the steel industry is largely done in dedicated equipment intended to give a closed system to minimise exposure to workers and emissions to the environment. After the products have been pyrolysed, the coal tar pitch is transformed into non-hazardous graphitic carbon. Therefore adequate controls already exist for the use of this substance and authorisation is not necessary. Uses which involve fully enclosed processes should therefore be exempt from authorisation.</p> <p><i>Confidential attachment removed</i></p> | <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>4. Control of risks</p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p>Please consider the responses to your comment #2709 in section I.</p> |
| 2715<br>2014/11/27 | The CaC <sub>2</sub> -<br>manufacturers<br>consortium,<br>Industry or trade<br>association,<br>Belgium | <p>Proposed exemption of uses and summary of operational conditions and risk management measures:</p> <p>If CTPHT is considered as a transported isolated intermediate, the authorisation regime is not applicable.</p> <p>Otherwise, it is proposed to exempt the following use from authorisation based on REACH Article 58 (2):</p> <ul style="list-style-type: none"> <li>• ES 19: Use at industrial site – Aluminium industry and Calcium Carbide industry: Aluminium and calcium carbide production by the Søderberg method.</li> </ul>  | <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.2.1. Request for Art 58(2) exemption for use of CTPHT as binder in</b></p>  |

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|  |  | <p>The justification for exemption of use of CTPHT in electrodes according to REACH Article 58 (2) is that all CaC2 manufacturers in the EU are already subject to regulation by:</p> <p>Workers protection</p> <ul style="list-style-type: none"> <li>• Carcinogens Directive (Directive 2004/37/EC);</li> <li>• Chemical Agents at Work Directive (Directive 98/24/EC): Currently no EU indicative or binding Occupational Exposure Limit (OEL) is available for CTPHT or its main marker components (e.g. benzo(a)pyrene); National OEL values exist for benzo(a)pyrene (BaP) and/or total PAH;</li> </ul> <p>Environmental control:</p> <ul style="list-style-type: none"> <li>• Industrial Emission Directive (Directive 2010/75/EU).</li> <li>• BREF (revised version expected by 2015 ) Large Volume Inorganic Chemicals Solids, LVIC-S.</li> </ul> <p>Further, the requirements laid down by the following Directives should be complied with via environmental permits:</p> <ul style="list-style-type: none"> <li>• Ambient Air quality: Directive 2004/107/EC (target value for BaP is 1 ng/m<sup>3</sup>);</li> <li>• Water environment: Water Framework Directive (2000/60/EC) and the daughter Directive 2013/39/EU on priority substances in the field of water policy, setting an environmental quality standard (EQS) for BaP at 1.7 x 10<sup>-4</sup> µg/L;</li> <li>• Waste Framework Directive (Directive 2008/98/EC).</li> </ul> <p>All CaC2 production sites apply the Søderberg method where the electrodes are formed and used in-situ. During storage, no significant releases of CTPHT or its components occur. Handling is always of short-term duration. The manufacturing process where Søderberg paste is transformed to electrodes is enclosed and trapping of fumes is integrated into the equipment. Efficient extraction of fumes from furnace is already in place because highly toxic carbon monoxide is released during the process. Collected gases are either flared or used as fuel for other processes. CO and any other compounds released from the process are thus further oxidized and not released as such to the environment.</p> <p>During storage, no significant releases of CTPHT or its components occur. While handling the Søderberg paste, workers are protected by enclosed equipment (e.g. truck with clean air supply).</p> | <p><b>electrodes</b></p> <p>In addition, please consider the responses to your comment #2715 in section I.</p> |
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|                    |  | <p>Because of the harmonised classification of CTPHT under the CLP Regulation as H400/H410 (due in 2016), mixtures with CTPHT such as Søderberg briquettes will be classified as dangerous goods. This will entail further strengthening of the transport and on-site handling conditions to prevent release to the environment, e.g. prevention of dust formation and spills by switching from open handling to use of big-bags, starting from receiving the briquettes at the site, through storage, to charging of the Søderberg electrode equipment. The necessary adjustments in handling conditions are already implemented, or implementation is currently planned by industry.</p> <p>Based on the above, it is clear that CTPHT is already a heavily regulated substance, either directly or through the regulation of its components (e.g. BaP, PAH).</p> |   |
|                    |  | 2715_20141127 - -Part A-Addi Non-confidential Info.pdf<br><i>Confidential attachment removed</i>  |   |
| 2771<br>2014/11/28 | Wirtschaftsvereinigung Metalle,<br>Industry or trade association,<br>Germany | Also in this respect WVM supports the arguments brought forward.  | Please consider the responses to your comment #2771 in section I. |
| 2775<br>2014/11/28 | WKÖ,<br>Other contributor,<br>Austria  | See PDF attached.<br>2775_su_87_WKÖ Steinkohleerpech.pdf  | Please consider the responses to your comment #2775 in section I. |
| 2812<br>2014/11/28 | ACEA,<br>Industry or trade association,<br>Belgium                           | 2812_20141128_Proposal for annex XIV recommendation on Coal Tar Pitch.pdf   | Please consider the responses to your comment #2812 in section I. |
| 2834<br>2014/11/28 | Norway,<br>Member State  | The Norwegian CA does not support that any exemptions from the authorisation requirement should be proposed.  | Thank you for providing your opinion.                             |
| 2881<br>2014/11/28 | European Aluminium Association,<br>Industry or trade association,<br>Belgium | 2881_EAA - Authorisation public consultation - ECHA - final 28112014.pdf  | Please consider the responses to your comment #2881 in section I. |
| 2925<br>2014/11/30 | Greece,<br>Member State  | We agree that coal tar pitch, high temperature, appears to meet the prioritisation criteria for inclusion in Annex XIV.   | <b>A.1.1. General, recommendation</b>                             |

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|  | <p>The main use of CTPHT is, as a binding agent (ca. 95%) in the production of electrodes (anodes, cathodes or graphite electrodes) which are mostly used in the production of metals, ferro-alloys, non-ferrous metals, metal alloys, calcium carbide and silicon carbide. The major part of the volume of CTPHT (about 85%) used in Europe, is for the production of aluminium smelting anodes.</p> <p>In our understanding, at present, it is not possible to viably substitute CTPHT for some uses (e.g., CTPHT-based electrodes in the aluminium production process), as alternatives for these uses are currently not known, despite the fact that there have been many efforts in terms of research and development in order to identify possible substitutes.</p> <p>Coal tar pitch, high temperature, was identified as a SVHC according to article 57 a, d and e of REACH. We have reservations regarding the use of authorisation (Annex XIV) as a risk management measure for CTPHT. Currently, it is not clear whether authorisation is the most appropriate risk management route. Being classified as carcinogenic, category 1B, CTPHT is indirectly covered by REACH annex XVII. The placing on the market or use, as substances, as constituents of other substances, or in mixtures for supply to the general public is not permitted. As far as graphite electrodes are concerned, CTPHT is not present in the final product and customers do not receive any CTPHT-containing products.</p> <p>The occupational exposure for workers in the aluminium industry seems to be kept below current BaP national OELs. Operational conditions, risk management and best practice in the production of anodes (and the relevant emissions and emissions' controls) are covered in Best Available Techniques for the Non-Ferrous Metals Industries.</p> <p>The Risk Reduction Strategy on workers prepared by Netherlands in 2007, recommended the establishment of a european OEL. Moreover exposure of CTP for workers is regulated through directive 2004/37/EC on " .... the protection of workers from the risks related to exposure to carcinogens or mutagen at work" and directive 98/24/EC on "... the protection of the health and safety of workers from the risks related to chemical agents at work". An environmental quality standard in the field of water policy has been established for benzo[a]pyrene (BaP) and a target value is set in the directive on ambient air quality and cleaner air for Europe. Directive 98/83/EC on "... the quality of water intended for human consumption" sets a limit for BaP.</p> <p>As far as protection of the environment is concerned, it seems that many unintentional sources contribute to the total emission of PAHs into the environment which are not related to manufacture and use of CTPHT. Annex XV report, of August 2009, mentions that no information on releases from manufacturing sites has been</p> | <p><b>process:</b></p> <p>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b></p> <ol style="list-style-type: none"> <li>1. Potential other regulatory actions</li> <li>3. Use specific scrutiny foreseen at application stage</li> <li>4. Control of risks</li> <li>5. Availability of suitable alternatives</li> </ol> <p><b>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.1. Request for Art 58(2) exemption for use of CTPHT as binder in electrodes</b></p> |
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|                            |  | <p>provided by manufacturers of CTPHT. IUCLID (2000) indicates that CTPHT is manufactured under vacuum in closed systems and that the possible two point sources of exposure are controlled. It appears that there are emission management measures in place at the production sites and waste water treatment. Wastes from the production of anodes are regarded as hazardous according to the Commission Decision 2000/532/EC.</p> <p>The prioritisation of substances from the candidate list for the inclusion in Annex XIV is based on the criteria set out in Art 58(3). However, these criteria do not include assessment based on the best risk management option. The Greek CA considers that a prior assesment is necessary in order to determine the most efficient and practical risk management measures before considering the inclusion of a substance in Annex XIV.</p> <p>Taking into consideration that the use of CTPHT in the production of electrodes is already regulated in many ways, aiming at the protection both of human health and the environment, and that no alternatives exist for this use, we recommend that if the substance must be included in Annex XIV, this use should be exempted from authorisation. A European OEL could also be established, as recommended in the RRS on workers.</p> |   |
| <p>2976<br/>2014/12/01</p> | <p>Outokumpu,<br/>Company,<br/>Finland</p> | <p>CTPHT is essential in the production of ferrochromium (FeCr), which, amongst others, is necessary for the production of stainless steel. CTPHT is not present in the ferrochromium. The produced volume of ferrochromium per year is 530 000 tons. To melt the ferrochrome, Outokumpu uses some 1000 tonnes CTPHT per year, mainly as a binder (20 %) in electrode paste.</p> <p>Closed loop:</p> <ul style="list-style-type: none"> <li>▪ CTPHT is only used in closed processes. The electrode paste is used as briquettes or cylinders, which are solid in room temperature (no dust or fume). The CTPHT compounds are burned in the closed furnace and the exhaust gas, consisting mainly of CO, is collected and used as fuel in other processes or in the power plant. There is no CTPHT in ferrochrome, which is the manufactured product [Ref. 4]</li> <li>▪ As CTPHT is used in a closed process, it does not cause emissions into air and water.</li> </ul> <p>No detectable health risk in systematic studies</p> <ul style="list-style-type: none"> <li>▪ Systematic scientific studies have been conducted concerning health effects of</li> </ul>  | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>1. Potential other regulatory actions<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks</p> |

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|  | <p>exposure to compounds connected with FeCr production since the 1970s in our Kemi-Tornio production chain. The results of the studies have been published in peer-reviewed medical journals. One example is the research on the effects to respiratory health in the stainless steel industry, including the FeCr production [Ref. 5]. In conclusion, the study showed that a long time exposure (an average time of 23 years) in modern ferrochromium and stainless steel production does not lead to adverse respiratory changes detectable by lung function tests or radiography.</p> <ul style="list-style-type: none"> <li>▪ Also the long term cancer study [Ref. 6] conducted by the Finnish Cancer Registry and based on reliable national registries showed clearly that there is no increased risk of cancer to individuals working in the steel mills and the ferrochromium plant.</li> <li>▪ If CTPHT would be a health risk in our production the increased risk should be detectable in above mentioned scientific studies.</li> </ul> <p>REGULATORY OPTIONS</p> <ul style="list-style-type: none"> <li>▪ Since the risks related to the use of CTPHT are widely-known and in our production eliminated, we suggest exempting CTPHT from authorisation and establish binding OELs at EU level as the most appropriate measure. If uncertainties remain we would consider a RMO more appropriate. This approach would be fully compatible with the main aim of REACH as stated in Recital 1: "ensure a high level of protection of human health and the environment as well as the free movement of substances"</li> <li>▪ It has to be underlined that the text regarding the exemption of specific uses in REACH and the existing ECHA guidance documents [Ref. 7] are not sufficiently clear. If it is interpreted to mean that our type of use could not be exempted we would consider this a serious unintended consequence which deserves to be included in the reviews the Commission is currently carrying out on authorisation before a decision regarding the inclusion in Annex XIV is taken.</li> <li>▪ We do not see either that authorisation in our case would speed substitution of CTPHT, which is another objective of REACH. The work on the substitution of CTPHT started before the inclusion of the substance on the ECHA candidate list and this will continue because it is a policy of Outokumpu as well as that of other market actors to replace SVHCs with less hazardous substances.</li> <li>▪ On the contrary, we believe that the inclusion of CTPHT in Annex XIV of REACH would probably delay substitution on the basis that the focus of us and many other actors will then be on achieving authorisation which after all in the current circumstances complies with a sound business practice (securing the use of a substance critical for production of FeCr).</li> <li>▪ In view of all the above authorisation would in no way improve safety and health of workers nor reduce the negative impact on the environment. It would only increase</li> </ul> | <p>7. Burden for industry and potential competitive disadvantage</p> <p><b>A.2.6. The text regarding the uses exempted from authorisation in the REACH legal text and in ECHA's Generic approach for the preparation of draft A.XIV entries is not clear</b></p> <p><b>A.2.7. Substitution of SVHCs is already part of the company's policy. Inclusion in Annex XIV will delay substitution rather than enhancing it</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p>In addition, please consider the responses to your comment #2976 in section I.</p> |
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|  |  | <p>uncertainties which would reduce competitiveness of a key industry in the EU.</p> <ul style="list-style-type: none"> <li>▪ Authorisation would be counter-productive to European Commission President Jean-Claude Juncker’s number one priority: “Getting Europe growing again and getting people back to work” and his statement that “we need to bring industry’s weight in the EU’s GDP back to 20% by 2020, from less than 16% today.” [Ref. 8]</li> <li>▪ We also believe that the inclusion of CTPHT to the authorization list would not comply with Juncker’s priority on better regulation: “Jobs, growth and investment will only return to Europe if we create the right regulatory environment and promote a climate of entrepreneurship and job creation. We must not stifle innovation and competitiveness with too prescriptive and too detailed regulations”. [Ref. 8]</li> </ul> <p>References</p> <ol style="list-style-type: none"> <li>1. Huvinen M, Mäkitie A, Järventaus H et al. Nasal cell micronuclei, cytology and clinical symptoms in stainless steel production workers exposed to chromium. <i>Mutagenesis</i> 2002;17:425-429.</li> <li>2. International Agency for Research on Cancer. Chemical agents and related occupations. <i>IARC Monogr Eval Carcinog Risks Hum</i> 2012;100F:161-166.</li> <li>3. Netherlands Organization for Applied Scientific Research (TNO) and the National Institute of Public Health and Environment (RIVM), Summary risk assessment report, Coal tar pitch, high temperature (CAS No: 65996-93-2; EINECS No: 266-028-2), April 2008<br/><a href="https://echa.europa.eu/documents/10162/13630/trd_rar_hh_netherlands_pitch_en.pdf">https://echa.europa.eu/documents/10162/13630/trd_rar_hh_netherlands_pitch_en.pdf</a></li> <li>4. European Commission, Reference Document on Best Available Techniques in the Non Ferrous Metals Industries, December 2001, Update under preparation.<br/><a href="http://eippcb.jrc.ec.europa.eu/reference/BREF/nfm_bref_1201.pdf">http://eippcb.jrc.ec.europa.eu/reference/BREF/nfm_bref_1201.pdf</a></li> <li>5. Huvinen M, Uitti J, Oksa P, et al. Respiratory health effects of long-term exposure to different chromium species in stainless steel production. <i>Occup Med</i> 2002;52:203-12.</li> <li>6. Huvinen M, Pukkala E. Cancer incidence among Finnish ferrochromium and stainless steel production workers in 1967-2011: a cohort study. <i>BMJ Open</i> 2013;3:e003819-doi:10.1136/bmjopen-2013-003819).</li> <li>7. European Chemicals Agency (ECHA), preparation of draft Annex XIV entries for substances recommended to be included in Annex XIV, 21 August 2014,<br/><a href="http://echa.europa.eu/documents/10162/13640/draft_axiv_entries_gen_approach_6th_en.pdf">http://echa.europa.eu/documents/10162/13640/draft_axiv_entries_gen_approach_6th_en.pdf</a></li> <li>8. Juncker, J-C, Political Guidelines for the next European Commission, Opening</li> </ol> |  |
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|                    |   | Statement in the European Parliament Plenary Session, A New Start for Europe: My Agenda for Jobs, Growth, Fairness and Democratic Change, <a href="http://ec.europa.eu/priorities/docs/pg_en.pdf#page=5">http://ec.europa.eu/priorities/docs/pg_en.pdf#page=5</a>   |  |
|                    |   | 2976_Consultation response articles.zip   |  |
| 3000<br>2014/12/01 | cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium      | see general comments<br>3000_CCSG for ECHA CTPHT PC 141201.pdf  | Please consider the responses to your comment #3000 in section I.  |
| 3015<br>2014/12/01 | The Federation of Finnish Technology Industries, Industry or trade association, Finland | <p>CTP should be removed from the final proposal or the use of CTP in metal and electrode production from authorization should be exempted.</p> <p>Coal Tar Pitch (CTP) is an essential substance in Ferrochrome (FeCr) melt process. CTP is needed as binding agent in electrodes which melt the ore. It is also used in smaller amounts in furnace lining and as taphole pastes. The electrodes are made from an electrode paste containing calcined coal/anthracit and 20-25 % CTP, The paste is solid in room temperature and there is no dust or fume. It is fed into the electrode from the top as solid pieces. In the furnace the paste melts and fills the electrode. For example Outokumpu has closed FeCr furnaces. The gases are burned and broken down by the heat in the closed furnace so there is no external exposure on PAH / CTP gases. There are no known alternative substances for replacing the CTP in the process.</p> <p>The Kemi mine and ferrochrome operations are an integral part of the Tornio stainless steel mill serving the entire Outokumpu operations. Without CTP containing materials the process does not work. This would lead to the closure of the whole plant and the mine would become unprofitable. This would have a direct effect of about 2500 employees in the Tornio region. With indirect effects, up to 9 000 jobs could be lost in Finland alone.</p> <p>The FeCr production process in Tornio is known as the most efficient and environmentally friendly FeCr production method (ICDA, Chrome Industry environmental achievements 2014). Replacing the efficient EU FeCr production with imports would lead to increase in global CO2 as the production methods e.g. in Asia and South Africa produce more CO2 emissions. It would also mean that EU would become entirely dependent on imports for a metal that it has defines as critical raw</p> | <p><b>A.1.1. General, recommendation process:</b><br/>5. New information and next steps towards the final recommendation</p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation:</b><br/>2. Aim &amp; proportionality of authorisation system - Authorisation is not a ban<br/>3. Use specific scrutiny foreseen at application stage<br/>4. Control of risks<br/>5. Availability of suitable alternatives<br/>6. Socio-economic benefits of continued use<br/>7. Burden for industry and potential competitive disadvantage</p> <p><b>A.2.3. Claim the use of</b></p> |

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|  |  | <p>material and one of the most important from an economical perspective. (Report on critical raw materials for the EU, DG ENTR May 2014 - <a href="http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf">http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/crm-report-on-critical-raw-materials_en.pdf</a>)</p> <p>CTP is used in the FeCr process in totally closed furnaces. There is no exposure as the CTP is burned/broken down in the furnace. Outokumpu has done systematic measurements of exposure to compounds connected with FeCr production since the 1970s. For example research in the effects to respiratory health in the stainless steel industry, including the FeCr production (Huvinen M, Uitti J, Oksa P, et al. Respiratory health effects of long-term exposure to different chromium species in stainless steel production. <i>Occup Med</i> 2002;52:203-12). In conclusion, the study indicated that an average exposure time of 23 years in modern ferrochromium and stainless steel production with low occupational exposures does not lead to adverse respiratory changes detectable by lung function tests or radiography. Among the published studies is an independently-funded cancer study that strongly indicates that there is no added risk of cancer to individuals working in the steel mills and the ferrochromium plant and living nearby (Huvinen M, Pukkala E. Cancer incidence among Finnish ferrochromium and stainless steel production workers in 1967-2011: a cohort study. <i>BMJ Open</i> 2013;3:e003819-doi:10.1136/bmjopen-2013-003819).</p> <p>As CTP is used in a closed process, it does not cause any emissions into air nor water. Outokumpu has conducted regular and systematic research over the years on the environment regarding emissions to air and water. As Outokumpu's Tornio site is located on the Tornionjoki river estuary on the coast of the Gulf of Bothnia and close to nature reserves, many studies monitoring the biological, physical and chemical conditions which prevail near the Tornio site have been carried out since the 1970s.</p> | <p><b>CTPHT/AO in the production of electrodes as intermediate</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> |
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