

**Comments on Dossiers from ECHA dated 1<sup>st</sup> September 2014 – Coal Tar Pitch high Temperature.**

Text according to the ECHA-Website

<http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list-/substance/6725/search+/del/20/col/extraColumn2504/type/asc/pre/2/view>.

- **General comments:**

- a. General comments on the recommendation to include the substance in Annex XIV, incl. the prioritization of the substance:

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.

Coal tar pitch is used in the aluminum industry. The main usages are the following:

- Prebake anode = 375 kt CTP/year
- Søderberg anode or briquettes = 30 kt CTP/year
- Ramming paste = 3.5 kt paste/year
- Collar paste = 2.5 kt paste/year

**Production of anode**

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.

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.

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:  $2\text{Al}_2\text{O}_3 + 3\text{C} = 4\text{Al} + 3\text{CO}_2$ . Based on this anodes are considered as mixtures before baking, and as a substance after baking, when the CTP is converted to coke.

#### **Collar paste and ramming paste**

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.

These usages are in the scope of authorisation.

#### **General comments**

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.

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.

- **Transitional arrangements (Application date and Sunset Date)**
  - a. Comments on proposed dates:

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.

- **Uses (or category of uses) exempted from authorisation requirement (including product and process oriented R&D (PPORD) and max. tonnage for that)**
  - a. Comments on uses that should be exempted, incl. reasons for that:

Not applicable

- **Review periods for specific uses**
  - a. Comments on uses for which review periods should be included in Annex XIV, incl. reasons for that:

The review period should be in line with the actual state of the art and the lack of alternatives.

- **Attachment (additional non-confidential information)**
  - a. Please provide comments in the respective fields of section III.
  - b. Attachment in this section are exclusively reserved for additional information
  - c. Please avoid repetition

EAA 28<sup>th</sup> November 2014  
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