ACEA
European Automobile Manufacturers Association

ACEA comments on ECHA's draft recommendation of priority substances for inclusion in the list of substances subject to authorisation (Annex XIV) for cobalt salts

The ECHA (European Chemicals Agency) published several cobalt salts as a recommended substance for inclusion in Annex XIV.

Substance name	EC number	CAS number
Cobalt dichloride	231-589-4	7646-79-9
Cobalt(II) carbonate	208-169-4	513-79-1
Cobalt(II) diacetate	200-755-8	71-48-7
Cobalt(II) dinitrate	233-402-1	10141-05-6
Cobalt(II) sulphate	233-334-2	10124-43-3

Use of Cobalt (II) Salts as Raw Material in the Automotive Industry

Cobalt (II) Salts are widely used in the supply chain of the automotive industry. They are utilised as catalysts or their educts. Further applications comprise surface treatments (such as electroplating), corrosion prevention, decolourisation, batteries, manufacture of other chemicals including pigments, alloys, dyes, rubber adhesion…

Due to EU End of Life Directive 2000/53/EC the automotive industry has changed from Chromium^{6+} containing anticorrosion surfaces to other substitutes in running series since 2007.
To maintain the same corrosion, thermal and quality performance of the Zink alloy coatings (substitute for Chromium^{6+} coatings) Cobalt salts are needed.
Currently there are no equivalent substitutes to the aforementioned Cobalt compounds available.

Risks resulting of addition of cobalt salts to Annex XIV

The named substances are technically essential to our industry in order to achieve the required high level of safety and quality. Coatings e.g. for nuts and screws have to fulfill very high requirements on mechanical and corrosion stability in order to achieve the necessary level of safety over the lifetime of a vehicle.
The costs for the phase out of the former Chromium6+ coatings required several hundred millions of Euros to automotive industry. Another change due to the loss of the necessary raw materials within Europe would lead to a transfer of a part of the European high technology production outside Europe.

This will cause

- a massive loss in sales for EU companies
- a shift of production into non EU countries, where in some cases the occupational and environmental standards are not as high as in Europe
- a reduction of employed people within Europe
- a loss in quality and, consequently, in safety of European vehicles