ECHA's third Recommendation for the inclusion of substances in Annex XIV of REACH – Structured Response Template

Part 1 - Respondent information

Company	ERAMET SA (ERAMET Le Havre Sandouville site)
Contact Details of Respondent/s (name, job title, address, email address etc)	Marcel VADROT marcel.vadrot@erametgroup.com

Substance	Cobalt carbonate
CAS number	513-79-1
Use/s (*e.g. surface treatment*)	Manufacture of other chemicals

Part 2 – General Comments on the Background Documentation, including the recommendation for prioritisation.

When reviewing background documentation please comment on ALL errors, clarifications and omissions (e.g. all uses of cobalt salts relevant to responding companies should be detailed)

Section	**Comment**
2.1 Intrinsic properties	/
2.2.1 *Volume(s) imports/exports*	/
2.2.2.1 Manufacture and releases from manufacture	*Page 2 paragraph 2*: "Concentrations at workplaces with exposure to cobalt salts in a refinery were 68 – 89 µg/m3 (range 1 – 7700 µg/m3) (Lison 1994 in the Netherlands, 2010)". In this paragraph, the exposure concentration does not represent the uses of cobalt carbonate. There is no specific data for cobalt carbonate in this document. This paragraph is the same for the five draft background documents on cobalt salts. These data date back to 1994 and the values shown in this paragraph do not reflect the present situation in the cobalt salts industry. In addition these data do not clearly indicate whether exposure refers to employees in the plant or the potentially exposed workers. *Page 2 paragraph 3*: ERAMET is producer and user of cobalt carbonate in France (at the Le Havre Sandouville site). Cobalt carbonate is used there as intermediate in the synthesis of other chemicals and under strictly controlled conditions.

Section	Comment
2.2.2.2 Uses and releases from uses	**Manufacture of other chemicals;** ERAMET usage of cobalt carbonate is clearly in this category of use. The Cobalt carbonate which is produced at the ERAMET Le Havre Sandouville site is totally consumed as onsite isolated intermediate in the synthesis of cobalt dichloride. Cobalt carbonate is not present in the final product. **Volumes per sector or use** We confirm that 100% of cobalt carbonate produced by ERAMET Le Havre Sandouville site is used as onsite isolated intermediate under strictly controlled conditions. **Releases from uses** *Page 4 paragraph 4*: "Some measured concentrations have been reported in the literature for the dust in facilities producing cobalt salts (0.05–50 mg cobalt /m3), and in a refinery (relating to cobalt salts use - 68 – 89 µg/m3; range 1 – 7700 µg/m3) (the Netherlands, 2010; RCOM, 2010) » This exposure concentration does not correspond to cobalt carbonate and does not represent the uses of cobalt carbonate. *Page 4 paragraph 6*: "As regards consumer exposure, in a relevant study on porcelain dinnerware from Europe and Asia, which had been manufactured before mid-1970s and had hand painted designs over the glaze, the extracted Co under acidic conditions was from <0.020 to 2.9 µg/mL (Sheets 1998 and ASTDR 2004 in the Netherlands, 2010). This exposure concentration does not correspond to cobalt carbonate but refers to cobalt metal, oxides and several other salts. Asia is not part of the European Union, and data from outside the EU should not be taken into account as a reference for sites within the EU.
2.2.2.3 Geographical distribution and conclusions in terms of (organisation and communication in) supply chains	/

Section	Comment
2.3 Availability of information on alternatives	In order to meet our customer's product specification, there is no alternative substance to Cobalt Carbonate.
2.4 Existing specific Community Legislation relevant for possible exemption	« No data available »: we would like to recall that other community legislation exists. For example the French regulation N° 2001-97 lays down specific rules for the prevention of carcinogenic, mutagenic or toxic for reproduction (CMR regulation) risks for any use of CMR products. Also suspected CMR are under other regulatory requirements (Regulation 2003-1254 of 23 December 2003 on the prevention of chemical risks). In Europe, all the activities related to the use of CMR compounds must follow EEC regulations since 1998 : Directive 98/24/CE then in 2004 Directive 2004/37/CE. In France, these texts were enforced by the French authority DRIRE, which has now become DREAL, and is in charge of REACH enforcement as well.
2.5 Any other relevant information (e.g. for priority setting)	/
3.1 Prioritisation Specifically, please comment on: • Verbal Argumentative Approach • Scoring Approach • Conclusion (e.g. regulatory effectiveness)	**Scoring approach - Release = 3** (for some uses risk of significant and potentially uncontrolled exposure) We would like to recall that cobalt carbonate at the Le Havre Sandouville site is used as an intermediate in the synthesis of cobalt dichloride, in continuous operations under strictly controlled conditions. Cobalt carbonate is not present in the final product. As previously mentioned, we would like to underline the fact that exposure data provided in page 4 paragraphs 4 and 6 do not correspond to cobalt carbonate but refer instead to cobalt metal, oxides and several other salts. Values shown in this paragraph do not reflect our situation in the Sandouville plant and in our case, the release score of 3 for the use of cobalt carbonate seems to be excessive.

Any other comments on the draft Background documentation	

Part 3 –Chemical inter-changeability (mutual substitution) of cobalt salts

The prioritisation of a group of five cobalt salts is considered to be on the basis of "Regulatory Effectiveness". This is because ECHA assume that the salts can be employed inter-changeably across uses/application.

Comments relating to chemical inter-changeability • e.g. are uses ascribed to individual salts in background documents correct? • Is the assumption of mutual substitution valid? If so, in which applications. If not, what chemical/process/economic reasons are there to argue against this assumption?	In the production of CoCl2, we confirm that it is impossible for ERAMET to use anything else than Cobalt Carbonate.

Part 4 – Candidates for Exemption and Continued Use

Provide brief details (including rationale) of your company's specific use/s of cobalt salts that you consider should be **exempt** from Authorisation. Please consider both "general" and "use-specific" exemptions, including limits for PPORD (see accompanying factsheet on exemptions to authorisation under REACH).	ERAMET does not sell Cobalt carbonate. It is totally consumed at the Sandouville site. Cobalt carbonate is used as an intermediate in the synthesis of cobalt dichloride. Should carbonate cobalt be finally included in the Annex XIV list, we recommend that the exemption related to the intermediate status be specifically mentioned in ECHA's comments.
Provide brief details of any of your company's uses of cobalt salts that are potentially candidates for **continued use** under Authorisation (i.e. would require an authorisation to be granted)	/

Part 5 – Timetable for Authorisation

Comments on the proposed dates for transitional arrangements (i.e. application and sunset dates)	/
Comments on the review periods for specific uses	/

Part 6 – Other comments

Any further comments on the ECHA Annex XIV Consultation	