

Comments and references to responses on ECHA's 6th Draft Recommendation for Anthracene oil (EC number: 292-602-7)

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 Anthracene oil (EC number: 292-602-7). 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_anthracene_oil_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). 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.....	4
III - Comments on uses that should be exempted from authorisation, including reasons for that	4

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
2710 2014/11/27	Vesuvius Group, Company, United Kingdom	Anthracene oil is not a clearly defined substance and its hazard profile will depend on the relative proportions of particular polyaromatic hydrocarbons and its physical properties such as viscosity. Therefore it is inappropriate to treat all the real materials coming under the anthracene description in the same way - especially with	A.1.1. General, recommendation process: 5. New information and

		regard to authorisation. <i>Confidential attachment removed</i>	next steps towards the final recommendation A.1.5. Aspects not considered in ECHA's prioritisation: 2. Aim & proportionality of authorisation system - Authorisation is not a ban 3. Use specific scrutiny foreseen at application stage 5. Availability of suitable alternatives 7. Burden for industry and potential competitive disadvantage A.2.4. Scope of the Annex XIV entry / SVHC properties may depend on the composition
2824 2014/11/28	Norway, Member State	The Norwegian CA supports the prioritisation of anthracene oil for inclusion in Annex XIV.	Thank you for providing your opinion.
2941 2014/11/30	Austrian workers' compensation board, National Authority, Austria	This raw oil roduct has wide and dispersive uses and fulfills criteria of cancerogenic properties. Thus we strongly support that this substance enters Annex XIV.	Thank you for providing your opinion.
3003 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium	All comments submitted by cefic "Coal Chemicals Sector Group (CCSG)" representing all European Anthracene Oil producers are compiled in one attached file. Best regards Winfried Boenigk CCSG Chairman 3003_CCSG for ECHA AO PC 141201.pdf	A.1.1. General, recommendation process: 5. New information and next steps towards the final recommendation A.1.2. Prioritisation:

			<p>Volume</p> <p>A.2.1. Information on anthracene oil on uses and volumes per uses (potentially impacting the priority scores)</p> <p>A.2.3. Claim the use of CTPHT/AO in the production of electrodes as intermediate</p> <p>B.1.1. General principles for setting latest application dates / sunset dates 3.ECHA's proposal for latest application dates</p> <p>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates: 1. Extensive time needed in the supply chain to getting organised for preparing application (e.g. due to high number of users)</p> <p>C.1.2. Generic exemptions</p>
3006 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade	Resubmission due to mistake in e-mail address The comments of cefic "Coal Chemicals Sector Group (CCSG)" representing all European producers of Anthracene Oil are compiled in one attached document. Best regards	Please consider the responses to your comment #3003 in section I (see above).

	association, Belgium	Winfried Boenigk CCSG Chairman	
		3006_CCSG for ECHA AO PC 141201.pdf	

II - Transitional arrangements. Comments on the proposed dates

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2710 2014/11/27	Vesuvius Group, Company, United Kingdom	<i>Confidential attachment removed</i>	Please consider the responses to your comment #2710 in section I.
2824 2014/11/28	Norway, 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.1.1. General principles for setting latest application dates / sunset dates: 3. ECHA's proposal for latest application dates
3003 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium	see general comments 3003_CCSG for ECHA AO PC 141201.pdf	Please consider the responses to your comment #3003 in section I.
3006 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium	see general comments 3006_CCSG for ECHA AO PC 141201.pdf	Please consider the responses to your comment #3003 in section I.

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

Number /	Submitted by	Comment	Reference to
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Date	(name, submitter type, country)		responses
2710 2014/11/27	Vesuvius Group, Company, United Kingdom	<p>According to the entry in the CLP regulation, anthracene oil is a complex combination of polycyclic aromatic hydrocarbons obtained from coal tar. The regulation also applies Note M to this substance. The data submitted in the REACH registration indicates a lower level of hazard when benzo(a)pyrene is below 50ppm and further lower when there is no aspiration hazard.</p> <p><i>Confidential attachment removed</i></p>	<p>A.2.4. Scope of the Annex XIV entry / SVHC properties may depend on the composition</p> <p>C.2.2. Reference to Carcinogens or Mutagens at Work Directive – (2004/37/EC) with regard to use of anthracene oil and CTPHT</p> <p>In addition, please consider the responses to your comment #2710 in section I.</p>
2824 2014/11/28	Norway, Member State	Norway does not support that any exemptions from the authorisation requirement should be proposed.	Thank you for providing your opinion.
3003 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium	<p>see general comments</p> <p>3003_CCSG for ECHA AO PC 141201.pdf</p>	<p>C.1.2. Generic exemptions. Note that the generic exemption may apply because such use appears to be intermediate.</p> <p>C.2.3. Exemption for use of anthracene oil as fuel and biocide</p> <p>In addition, please consider the responses</p>

			to your comment #3003 in section I.
3006 2014/12/01	cefic "Coal Chemicals Sector Group (CCSG)", Industry or trade association, Belgium	see general comments 3006_CCSG for ECHA AO PC 141201.pdf	C.2.3. Exemption for use of anthracene oil as fuel and biocide In addition, please consider the responses to your comment #3003 in section III (see above).