

Answer to Consultation

ASD's ANSWER TO ECHA CONSULTATION ON NONYLPHENOL

About ASD

ASD represents the Aeronautics, Space, Security and Defence industries in Europe. Based in Brussels, the organisation's membership today comprises 16 major European aerospace and defence companies and 27 member associations in 20 countries (Austria, Belgium, Bulgaria, the Czech Republic, Denmark, Finland, France, Germany, Greece, Ireland, Italy, the Netherlands, Norway, Poland, Portugal, Spain, Sweden, Switzerland, Turkey and the UK). These industries reach a turnover of 186.8 billion euros, invest 17.6 billion euros in R&D, employ more than 750.000 people and counts over 3000 companies, 80 000 suppliers, many of which are SMEs.

4-Nonylphenol

4-Nonylphenol, branched and linear, ethoxylated [substances with a linear and/or branched alkyl chain with a carbon number of 9 covalently bound in position 4 to phenol, ethoxylated covering UVCB- and well-defined substances, polymers and homologues, which include any of the individual isomers and/or combinations thereof]

We can understand the issues of publishing a long list of CAS numbers however we know of no effective way to identify, on the part of a Downstream User, which products these materials would be used for. Without a CAS number we cannot identify the products!

This is not a helpful position and nullifies any consultative information we may be able to provide.



Jan Pie

ASD Secretary General
28 November 2014