



klöckner pentaplast

Company:

**Klöckner Pentaplast Europe GmbH & Co. KG
Industriestraße 3-5
56412 Heiligenroth
Germany**

Subject:

**Comments For Public Consultation DOTE
- Information on Use, Alternatives, Exposure and Risks**

Klöckner Pentaplast Europe GmbH & Co. KG
Postfach 1165, 56401 Montabaur
Industriestraße 3-5, 56412 Heiligenroth
Deutschland
Telefon: +49 2602 915-0
Fax: +49 2602 915-297
Sitz: Heiligenroth
Amtsgericht Montabaur HRA 21471
Ust-IdNr.: DE292996763
www.kpfilms.com
kpinfo@kpfilms.com

Persönlich haftende Gesellschafterin:
Klöckner Pentaplast GmbH
Sitz: Heiligenroth
Amtsgericht Montabaur HRB 6803
Geschäftsführer:
Stefan Brandt
Marc Setzen
Dr. Rainer Rothermel

Bankverbindung:
Deutsche Bank AG, Koblenz
IBAN: DE23 5707 0045 0033 3435 00
BIC: DEUTDE5M



Comments on the Wide Dispersive Uses:

As downstream users of DOTE, we confirm that we use DOTE in an industrial setting only. We are not aware of any use of DOTE outside an industrial setting by professionals or consumers.

We confirm that our products fulfill the article definition under REACH. Any use of our products are part of the article life.

Comments on the likelihood of the release during article service life and waste phase:

We as the downstream users of DOTE agrees with the following statement:

In order to continue to stabilize the articles throughout its life-cycle stabilizers must not be washed off from the articles. Therefore those molecules are designed to have inherently low leaching rates and this is the case for octyltins which have a very low water solubility (high Octanol/Water partition coefficient). Moreover, DOTE are used extensively in rigid PVC films for food-contact and comply with the applicable Specific Migrations Limit of 6 µg/kg food, which confirms the low leaching rate in aqueous media. For many years in the USA, DOTE based stabilizers have complied with the strict guidelines set out by NSF/ ANSI 61 standards for use in drinking water applications.

Like all additives, leaching in contact with water is limited to a thin diffusion layer and does almost not affect the bulk of the material. This has been demonstrated indirectly by measuring the residual concentration of a tin stabilizer throughout the 6 mm wall of a 22-year old water pipe dug out. The depletion of tin was observed in the 1.5 micron boundary layer, representing 0.05 % of the pipe volume, whilst no depletion was observed in the bulk.

It is therefore the commentator's conclusion that it is unlikely for the release of DOTE during the article service life and waste phase. Additionally after many decades of use in these applications we are not aware of any reported adverse impact on users of articles containing DOTE.

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Comments on the Technical Feasibility of Calcium-based stabilizers as a substitute for DOTE:

Section 10.4 of the Annex XV dossier mentions Calcium/Zinc-based stabilizers as a substitute for DOTE. After extensive testing and formulation work, we have not been able to find an adequate technical substitute that is based on Calcium/Zinc to date.

Sincerely Yours,
Klöckner Pentaplast Europe GmbH & Co. KG

i. V. 

Bernd Schmidt

i. A. 

Michael Otten

Klöckner Pentaplast Europe GmbH & Co. KG
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