ETINSA European Tin Stabilisers Association

The following companies are members of ETINSA:

AKCROS Chemicals	BAERLOCHER	CHEMTURA
GALATA Chemicals	PMC Organometallix	REAGENS

ETINSA comments to the ECHA Public Consultation on the identification of SVHC, launched on 1st September 2014

ETINSA comments on the Annex XV on DOTE (EC # 239-622-4 ; CAS # 15571-58-1)

ETINSA notes concerning the Annex XV on DOTE

(As the Annexes XV are almost identical for both DOTE and the Reaction Mass the comments on the Annex XV on DOTE are broadly applicable to the RM as well, depending on the context).

General remark: DOTE is NOT used in the production of PVC (= the resin), it is used in the production of PVC articles (= conversion of PVC compounds in articles).

Heading 8.1 Uses > General function >Penultimate §:

Since 2006/2007, the classes of the organotins used as PVC stabilizers in Europe changed drastically: as of today, butyltins have almost completely being replaced, in most of the cases by a corresponding amount of octyltins.

Heading 8.2 > 8.2.1 Description of use >

Penultimate §:

Organotin stabilizers, such as DOTE, are not used as biocides, and organotins specifically designed to act as biocides are not useful as PVC stabilizers. Hence, this paragraph has nothing to do with DOTE.

Ultimate § (just before Table 3)

The PVC industry, in its efforts to promote a sustainable use of PVC and its stabilizer (Vinyl 2010 and, now VinylPlus), has already performed a Targeted Risk Assessment (ref. RPA Impact Assessment of Potential Restrictions on the Marketing and Use of Certain Organotin Compounds, 2007) showing that those restricted uses account for less than 5% of the market of DOTE, while more than 95% of the DOTE use is safe.

Last paragraph below Table 7

Contrary to what reported, that limited the investigation to Sweden (that represents about 1% of the organotin stabilizers European market), the total European market of the organotin stabilizers has not significantly declined, and is dominated by the use of DOTE.

Heading 9.3.2

1st line of 2nd paragraph: add "articles" after "PVC"

This heading does not take into account the "grass sampling study" conducted around a PVC processing plant, which was conducted by ETINSA after the release of the RPA 2005 report, and which shows that the exposure is below the TDI.

Heading 9.6 – Summary of releases

2nd paragraph

The CSR has been revised for what concerns the exposure of professional workers and consumers; hence the data reported in § from 9.4 to 9.6 are no longer applicable.

Heading 10.2 > Conclusions> 2nd § on SUBSPORT:

The example reported on hydrotalcites is misleading, since, hydrotalcite cannot replace DOTE as a drop-in substance. Moreover, concerning the last sentence, PVC is a versatile material, which has been subject to a severe and responsible sustainability programme - see www.vinylplus.eu. Before considering any possible substitution with alternative materials, it would be strongly advisable to study in detail the potential risks of introducing any alternative material, as long as not fully assessed in terms of sustainability, as PVC is.

Heading 12 - §3

As correctly mentioned, the European Commission risk assessments, has already concluded restriction measures for organotin compounds of concern, now included in Reach Annex XVII. Additional restriction/authorization measures would not enhance the protection of health and environment while posing serious threats to the European Industry. In case DOTE would become a SVHC, the production of DOTE-stabilised articles would likely move outside the EU.

Indeed articles produced with stabilizers with a low DOTE content will remain below the 0.1 % threshold requiring notification upon re-import in the EU. This could potentially lead to the loss of thousands of jobs without improving health and environment protection.

END