



REGULATORY UPDATE

ASW/RCF NOT INCLUDED ON REACH ANNEX XIV

The European Commission recently published the result of a voting of the REACH Article 133 Committee¹ which took place during a meeting on December 8th 2016. The group voted on the Commission proposal for the inclusion of another 12 substances on REACH Annex XIV (the Authorisation List) based on ECHA's 5th and 6th recommendation. The Commission proposal was accepted by the vast majority: 25 Member States voted in support with only 3 abstentions.

For some substances included in ECHA's recommendations the Commission has suggested to either postpone the inclusion on Annex XIV or to evaluate other regulatory options. ASW/RCF has been part of the group of substances which were not suggested to move forward to authorisation. In its justification² the Commission stated that ASW/RCF fibres "*are manufactured at a very limited number of industrial sites and are in general directly transformed [...] into articles.*" Articles are not subject to authorisation³. Through their vote the Member States confirmed the Commission's view that a further assessment of "*the most relevant regulatory approach*" is required. This decision is in line with ECFIA's position⁴.

ECFIA SUPPORTS A TARGETED WORKPLACE REGULATION FOR THE USE OF ASW/RCF PRODUCTS

ECFIA continues to support the regulation of ASW/RCF products under applicable occupational safety and health (OSH) Directives⁵, including the implementation of a scientifically derived workplace limit value as recently suggested by the Commission in a proposed amendment of the Carcinogens and Mutagens Directive. The appropriate occupational risk management via OSH Directives is fully in line with the Commission's SVHC roadmap 2020. The principle of this targeted approach for industrially used chemical substances has also been supported by the Cross-Industry Initiative for better regulation in chemicals management (CII), composed of more than 50 European and national organisations across various industrial sectors⁶.

ECFIA remains open for continued cooperation with all stakeholders to provide guidance in addressing risks, and to help ensure adequate protection of workers, while handling high temperature insulation wool (HTIW) products – in line with our proactive Product Stewardship Programme (PSP)⁷.

ASW/RCF has not been included in the Authorisation List. An assessment of alternative regulatory instruments is pending, likely resulting in an approach more relevant to ensure adequate worker protection.

ECFIA accepts the SCOEL recommendation and the Commission proposal for a binding occupational exposure limit value (BOELV) of 0.3 f/ml and confirms its commitment to support the implementation, helping users to control and reduce exposures via the CARE Programme, an integral part of our PSP.

1 The REACH Art. 133 committee is a group of EU Member State representatives responsible for certain decisions under the REACH Regulation.

2 Available [online](#)

3 For our interpretation of the substance/article definition for HTIW products see this [Paper](#).

4 For details see ECFIA Paper "[Better Regulation: REACH Authorisation or OSH Directives? ...](#)"

5 For details see ECFIA Paper "[Regulatory Risk Management of Alumino-Silicate Refractory Ceramic Fibres](#)"

6 For more information visit the [CII website](#)

7 For details on our PSP see ECFIA brochure "[Product Stewardship Programme](#)"