



Downstream user exposure scenarios being prepared for REACH

The International Antimony Association (i2a) is preparing REACH registration dossiers for 10 antimony substances and is currently focusing on three substances for the 2010 deadline: antimony metal, diantimony trioxide (ATO) and sodium hexahydroxoantimonate (SHHA). Our current focus is developing exposure scenarios for consumer and occupational exposure, as well as exposure via the environment. The exposure data from the ATO Risk Assessment will serve as a basis for all further developments.

Additional data have been gathered via questionnaires returned from individual downstream users and user associations. The preliminary results for uses of the first three REACH substances can be found at http://www.antimony.be/reach/docs/ListOfIdentified_Uses.pdf.

i2a launched a successful campaign to members' customers to help identify all downstream uses of antimony by the 30 November 2009 deadline, in order to be able to correctly assign the user descriptor codes (e.g. PROCs, SUs and ERCs - see ECHA guideline R 12 for details). **These codes will be further grouped by i2a consultants into the main generic categories, so that only a limited number of different exposure scenarios need to be developed to cover all the different exposures from each sector.**

The first draft exposure scenarios are due by February 2010; they then will be reviewed by the key players. All exposure scenarios for the first three REACH substances will be finalised by April 2010.

If you have not yet provided your supplier with an overview of all your uses, please do so immediately!

i2a argues against wider RoHS ban that includes antimony trioxide

As reported in our newsletter of January 2009, antimony trioxide is not included in the Commission's proposal for the revised EU Directive on the restriction of hazardous substances in electrical and electronic equipment (RoHS in E&E), which is due to be adopted by Parliament and Council by early 2010.

Recently, UK MEP Mrs Jill Evans of the Green/EFA group, asked the Commission to amend the RoHS directive with 74 amendments (see i2a press release of November 2009 on this). Amendment 69 requests the inclusion of antimony trioxide (ATO) in the next review of the RoHS directive, due in four years from now. It would put ATO on a candidate list for potential future inclusion on the RoHS list four years from now. Although this does not ban ATO from E&E applications now and maybe never; **we however feel this is not justified considering the available scientific proof that ATO poses no risk for consumers.**

Over the last nine years, more than € 3 million has been invested in independent, scientific human-health and environment research by the relatively small Sb industry. The EU Risk Assessment report on ATO is finalized and publicly available, and the same data were approved at OECD level. The uniform conclusion of all the international and *independent experts* was that there is NO RISK for consumers if ATO is used in consumer goods such as mobile phones or in any other E&E application, as antimony is encapsulated in the plastic resin. Furthermore, the Risk Assessment found no risk related to release of antimony from disposal (landfill or incineration).

Science as basis for regulatory decisions

i2a and its members take regulatory issues very seriously and continue to invest in scientific research. Ten REACH dossiers are currently in preparation; three of them for registration already in 2010, the other seven will be ready in 2012. We trust that technical performance parameters and scientific research continue to be the basis of future decisions on which substances to use in what applications.

Guidelines for worker-health monitoring available

The safety of production workers remains a high priority for our members. The Belgian university UCL has therefore worked out some relevant guidelines, entitled: "Management of the health risks related to chronic exposure to ATO in production workers". These guidelines aim to summarize existing data about diantimony trioxide for occupational safety and health professionals, who may need such information to conduct relevant and effective occupational health programs. ATO producers voluntarily committed themselves to start monitoring their workers' health in this harmonised way so that a useful database can be built up and worker health protected.

Communication with pre-SIEF and SIEF: classification and labelling (C&L)

i2a will continue to communicate with the REACH pre-registrants of our ten antimony substances via the i2a website. Information on classification and labelling (C&L), resulting from the analysis of the ongoing scientific data gathering will be released in 2010, in due time for the harmonised notification of the C&L to ECHA by the end of 2010.

i2a membership encouraged by reduced fees for small tonnage bands

At the last i2a meetings in October it was decided to introduce an extra tonnage band (<10T) for calculating membership fees, in order to convince more producers and importers to join i2a. The more companies join i2a the better the market is represented - and the less everybody pays (i2a is a non-profit association). Membership fees for the <10T band have therefore been reduced from € ~42K to € ~23K for the 12-year period.

Upcoming events

16 March 2010: i2a Board of Directors (BOD) meeting in Brussels
17 March 2010: i2a General Assembly (GA) meeting in Brussels

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