



EU Risk Assessment - timing and outlook

- 30 June:** **Deadline for downstream users to report to IAOIA consultants on exposure and emissions data**
June & Sept: TC NES II & III: ATO has been removed from the agenda by KemI following postpone to allow time for science
23/24 Oct.: Next IAOIA meeting in Japan
4-7 Dec.: Last visit discussion at TC NES IV for ENV dossier? Discussion of new HH report?
12-14 Dec: PET 2006 conference in Amsterdam
April 2007: Planned cut-off date for start of REACH implementation

30 June Deadline for Downstream Users to Report to IAOIA Exposure and Emissions Data

Data gaps on environmental (ENV) emissions and exposure at the workplace from the antimony oxide using sectors still remain. These data gaps have to be filled in by end of June for the purpose of the EU's Risk Assessment. Based on the positive experience with PET (where we changed from a high risk to no risks) this is well worth doing in order to avoid default data being used to demonstrate risks that do not exist in reality. One example to demonstrate this: in the current risk assessment report, workers in the following sectors: production of flame retardants back-coating formulations, pigment in paint and ceramics and compounding of engineering plastics are supposedly in theory exposed to 25-50 mg Sb/m³. That is up to 100 times the OEL (occupational exposure limit)!

January-April, IAOIA worked with Petkonsept (Mike Neal) to contact customers using more than 125 T ATO/year. 125 T is the threshold value that KemI defined for ENV risks. Several downstream users were identified and requested to fill in a questionnaire, resulting in 11 usable filled-in questionnaires for ENV. For HH there is no threshold as it is assumed that smaller companies tend to be less focused on personal protective equipment and exhaust ventilation than big companies, leading to potential higher exposure for the workers in smaller companies. So all companies, regardless of volume ATO used, will need to be contacted and asked to fill in the questionnaire for HH.

Since mid May, IAOIA is working with a large consulting agency, AMI (Applied Market Information) to help us gather new data on both ENV and HH (human health). AMI has put several people on this project who are calling our European customers to fill in our questionnaires for ENV and HH. Most customers are addressed in their own language.

In order to avoid that we need to collect actual measured data (Sb emissions to the environment and Sb air concentration at the workplace) from all downstream users, our aim is to identify analogies in the way ATO is handled by the different downstream user sectors. IAOIA already has a detailed evaluation of the way ATO is handled at the producers' site and in the PET industry. The EU risk assessment authorities accept that if an industry can demonstrate that exposure and/or emissions to the environment from one user sector (in ATO's case PET) is comparable to what happens in other sectors, the same conclusions can be drawn (i.e. no identified risks) and these other sectors will not need to undergo an extensive program of actual emissions measurement.

Gaining information on the production process description (how ATO enters the process – closed/open system – in powder/wetted or granules ...) is therefore extremely important. Furthermore we need to collect general information like:

How many workers are exposed to ATO? How much ATO is handled per shift? Which composition of ATO is used (powder, wetted, particle size ...)? Number of emission days/year? Do you have air pollution control?

These are the kind of questions downstream users will find in our questionnaires. Our consultant will also visit 1 production facility from each downstream use, before being able to evaluate the filled in questionnaires. We aim to receive enough filled in questionnaires so that the coverage is considered representative of the downstream use in the EU.

We have tried to identify and contact as many users as possible. If you have not yet been approached by AMI for this data gathering project and you are a user of ATO (non PET use) or if you have any question related to this data gathering project, please contact the IAOIA secretary-general, Karine Van de Velde. (kvdv@iaoia.be or +32 32 97 60 92).

Thank you for your cooperation!

We count on you to act so as to avoid unjustified risks from being imposed on your sector.

EU Risk Assessment – No R52/53 ENV Classification and Labelling for ATO needed

We stated in our newsletter of October 2002 that ATO does not need to be labelled for ecotoxicity. However, KemI re-opened the discussion by proposing an R51/53 ecotox classification in their first draft environment risk assessment report of July 2004. In the next RAR of October 2005, KemI proposed two options: no ecotox classification at all or R52/53.

On April 26, ATO was on the agenda of the Environment Classification and Labelling meeting in Arona, Italy. All EU member states discussed the potential R52/53 ecotox classification of ATO. R52/53 = Harmful to the aquatic organisms; may cause long-term adverse effects on the aquatic environment. Italy, Belgium and the Netherlands were not present at this meeting. Contributions to the discussion were made by: Spain, Denmark, Finland, France, UK and Ireland.

It was decided by the Member States at this meeting on April 26 that antimony trioxide DOES NOT need to be labeled with R52/53; so ecotox classification is not needed, nor is labeling required.

ATO remains not classified for ecotoxicity. It is now officially accepted by all member states.

EU Risk Assessment – positive outcome of the bilateral meeting with the Swedish Rapporteur

On April 28, industry had a bilateral meeting with the Swedish rapporteur (KemI), as we announced in our April 2006 newsletter. The meeting was very constructive and a lot of topics were discussed. KemI accepted a lot of our comments that were sent to them 1st of April (COM 415_HH_IND5) and promised to review again some of our other points made.

It was also agreed that more communication and interaction between IND and the Rapporteur is needed. The new draft RAR's will be discussed with IND in another bilateral meeting before discussions at TC-NES take place.

ATO was not on the agenda of the June TC NES meeting and KemI just requested to delay the HH discussion further to December. The ENV will NOT be discussed in September either, but in December as well. This way IND will have the opportunity to discuss the results of the downstream users' data gathering project with the Rapporteur as well.

We await to see how all this information will be integrated in the new draft RAR.

Updated List of IAOIA Members:

An updated list of IAOIA members is available at www.iaoia.org.

These are the responsible companies that are working very hard to ensure that antimony products are protected in the market place through proper response to appropriate government agencies and development and distribution of reliable data. These organizations share the costs, both financial and through employee time. By choosing to conduct your business with one of these companies you are supporting our industry.

If you are a producer, distributor or consumer of antimony products and would like to contribute to these efforts, contact an IAOIA, JMIA, CCCMC office or one of our member companies.

Organization of IAOIA

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