

COMMENTS AND RESPONSE TO COMMENTS ON CLH: PROPOSAL AND JUSTIFICATION

Comments provided during public consultation are made available in this table as submitted by the webform. Please note that the comments displayed below may have been accompanied by attachments which are not published in this table.

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Substance name: Special purpose E-glass fibres

CAS number: -

EC number: -

GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
17.04.2013	Belgium		Industry or trade association	1
Comment received				
The comments are related to the substance name, not to the proposed classification.				
The appropriate substance name should be: Special Purpose Glass microfibers [Calcium-aluminium-silicate fibres with random orientation with the following composition (% given by weight): SiO ₂ 50.0-56.0%, Al ₂ O ₃ 13.0-16.0%, B ₂ O ₃ 5.8-10.0%, Na ₂ O <0.6%, K ₂ O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe ₂ O ₃ <0.5%, F ₂ <1.0% with note R. Process: rotary (spinning) process or flame attenuation process.				

Comments on the dossier proposing Harmonised Classification and Labelling of the substance:

Special purpose E-glass fibres [Calcium-aluminium-silicate fibres with random orientation with the following composition (% given by weight): SiO₂ 50.0-56.0%, Al₂O₃ 13.0-16.0%, B₂O₃ 5.8-10.0%, Na₂O <0.6%, K₂O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe₂O₃ <0.5%, F₂ <1.0% with note R . Process: Drawing or spinning the molten mix (at approx. 1500°C) from nozzles].

General comments:

These comments are related to the substance name, not to the proposed classification.

The appropriate substance name should be:

Special Purpose Glass microfibers [Calcium-aluminium-silicate fibres with random orientation with the following composition (% given by weight): SiO₂ 50.0-56.0%, Al₂O₃ 13.0-16.0%, B₂O₃ 5.8-10.0%, Na₂O <0.6%, K₂O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe₂O₃ <0.5%, F₂ <1.0% with note R. Process: rotary (spinning) process or flame attenuation process.

Justifications supporting the comments related to the Substance Name:

1. Category of fibre.

The proposed substance name in the dossier (page 10 of the dossier) as well as the name of the dossier itself, "E-glass special purpose fibers" conveys the understanding that the key characteristic for classification of the fibre is the type of glass, namely E-glass. Moreover, the wording "E-glass fibre" is used more than 30 times across the dossier, without mentioning the type of fibre.

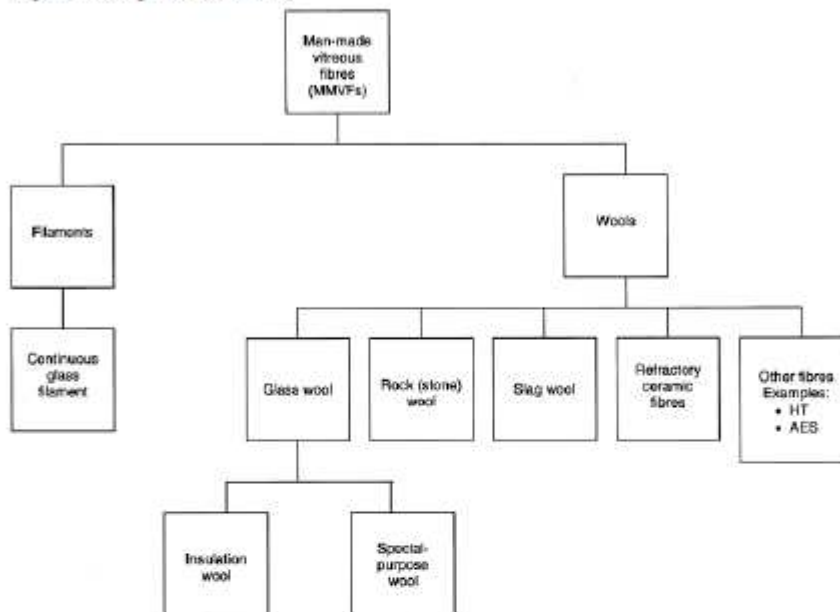
Note: E-glass is the most commonly used glass composition for Continuous Filament Glass Fibres which are not intended to be covered by this dossier.

The first criteria for classification of a fibre is its size or diameter (determined by its manufacturing process) and consequently its "respirability" or its "non-respirability". As a second order criteria comes indeed the glass composition, which determines the "biopersistence" of a fibre.

This is very well illustrated in IARC Monograph Volume 81 – Man-Made Vitreous Fibres, page 44: Categories of MMVFs, which makes a clear distinction between the category "Filaments" and all other MMVFs categories, namely "Wools", further categorized according to their composition.

Continuous filament glass fibres are not respirable and are not classified as hazardous (carcinogenic) by any relevant official organization.

Figure 1. Categories of MMVFs



Within each of these categories, there are commercial products representing a range of compositions and durabilities.
AES, alkaline earth silicate wools; HT, high-alumina, low-silica wools.

2. Manufacturing process.

The manufacturing process mentioned in the dossier's substance name, namely "Process: Drawing or spinning the molten mix (at approx. 1500°C) from nozzles" is not correct.

The "drawing process" is the specific process for manufacturing "continuous glass filaments". This process delivers filaments which have a precisely controlled nominal filament diameter with a narrow range of variation, obtained by a tight control of glass viscosity and a precise regulation of the linear drawing speed (ref. : IARC Monograph Volume 81, Page 70)

To our knowledge [we are not producers of Special Purpose Glass Microfibers], the process used for manufacturing Special Purpose Glass Microfibers is either rotary attenuation (spinning) or flame attenuation.

3. E-glass standard composition.

E-glass composition is defined by several Standards, among others ASTM D-578.

Technically speaking, the composition quoted in the dossier [SiO_2 50.0-56.0%, Al_2O_3 13.0-16.0%, B_2O_3 5.8-10.0%, Na_2O <0.6%, K_2O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe_2O_3 <0.5%, F_2 <1.0%], **is not an E-glass as defined by the composition range defined in Standard ASTM D578.**

Indeed, ASTM D578 Standard quotes a composition range of 0 to 5% for MgO (not 0 to 5.5%) and 16 to 25% for CaO (which does not cover the 15.0 to 24.0% range quoted in above substance description).

Extract of ASTM D 578 Standard:

4.2 "E" Glass—A family of glasses composed primarily of the oxides of calcium, aluminum, and silicon, which has the following certified chemical compositions.

4.2.1 The following certified chemical composition applies to glass fiber yarn products for printed circuit boards and aerospace.

Chemical	% by Weight
B_2O_3	5 to 10
CaO	16 to 25
Al_2O_3	12 to 16
SiO_2	52 to 58
MgO	0 to 5
Na_2O and K_2O	0 to 2
TiO_2	0 to 0.8
Fe_2O_3	0.05 to 0.4
Fluoride	0 to 1.0

4.2.2 The following certified chemical composition applies to glass fiber products used in general applications.

Chemical	% by Weight
B_2O_3	0 to 10
CaO	16 to 25
Al_2O_3	12 to 16
SiO_2	52 to 62
MgO	0 to 5
Total alkali metal oxides	0 to 2
TiO_2	0 to 1.5
Fe_2O_3	0.05 to 0.8
Fluoride	0 to 1.0

4. Fibres with random orientation versus Fibres with parallel orientation.

The substance name adequately refers to “fibres with random orientation” which is the common characteristic and wording associated with fibers belonging to the MMVFs “Wool” categories.

Continuous filament glass fiber, also known as “fibers with parallel orientation”(in relation with the glass filaments drawing process) are not covered by this classification.

It is therefore important to include the wording “fibres with random orientation” in the substance name, which excludes Continuous filament glass fiber from the classification.

Date	Country	Organisation	Type of Organisation	Comment number
17.04.2013	Belgium	Eurpean Owens Corning Fiberglas SPRL	Industry or trade association	2

Comment received

These comments are related to the substance name, not to the proposed classification. The adequate substance name should be:

Special Purpose Glass microfibers [Calcium-aluminium-silicate fibres with random orientation with the following composition (% given by weight): SiO₂ 50.0-56.0%, Al₂O₃ 13.0-16.0%, B₂O₃ 5.8-10.0%, Na₂O <0.6%, K₂O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe₂O₃ <0.5%, F₂ <1.0% with note R. Process: rotary (spinning) process or flame attenuation process.

ECHA note: the attachment is the same as provided with comment 1

Date	Country	Organisation	Type of Organisation	Comment number
17.04.2013	United Kingdom	PPG Industries (UK) Ltd, Fiber Glass Division	Company-Manufacturer	3

Comment received

Please see attached comments in uploaded attachement.

ECHA note: the attachment is the same as provided with comment 1

Date	Country	Organisation	Type of Organisation	Comment number
18.04.2013	Germany		Company-Manufacturer	4

Comment received

We suggest changing the name of the substance to:

Special Purpose Glass Microfibers [Calcium-aluminium-silicate fibres with random orientation with the following composition (% given by weight): SiO₂ 50.0-56.0%, Al₂O₃ 13.0-16.0%, B₂O₃ 5.8-10.0%, Na₂O <0.6%, K₂O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe₂O₃ <0.5%, F₂ <1.0% with note R. Process: rotary fiberisation or flame attenuation process.

Instead of:

Special purpose E-glass fibres [Calcium-aluminium-silicate fibres with random orientation

with the following composition (% given by weight): SiO₂ 50.0-56.0%, Al₂O₃ 13.0-16.0%, B₂O₃ 5.8-10.0%, Na₂O <0.6%, K₂O <0.4%, CaO 15.0-24.0%, MgO <5.5%, Fe₂O₃ <0.5%, F₂ <1.0% with note R□. Process: Drawing or spinning the molten mix (at approx. 1500°C) from nozzles].

Please find the rationale in the attached letter.

ECHA note: the attachment is the same as provided with comment 1

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17.04.2013	Germany		Company-Manufacturer	5

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Date	Country	Organisation	Type of Organisation	Comment number
17.04.2013	Netherlands	PPG Industries Fiber Glass BV	Company-Manufacturer	6

Comment received

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Date	Country	Organisation	Type of Organisation	Comment number
18.04.2013	Germany		MemberState	7

Comment received

It is recommended to indicate in the study reports whether no information is available on the concentration of fibres above 20 µm length and on concentration of WHO fibres or whether no fibres were above this length. The horizontal bar does not allow a clear interpretation.

CARCINOGENICITY

Date	Country	Organisation	Type of Organisation	Comment number
17.04.2013	United Kingdom	PPG Industries (UK) Ltd, Fiber Glass Division	Company-Manufacturer	8

Comment received

Continuous filament glass fiber is not considered carcinogenic.

Date	Country	Organisation	Type of Organisation	Comment number
19.04.2013	Sweden		MemberState	9
Comment received				
SE supports classification of E-glass special purpose fibers as specified in the proposal. SE agrees with the rationale for classification into the proposed hazard class.				

Date	Country	Organisation	Type of Organisation	Comment number
18.04.2013	Germany		MemberState	10
Comment received				
Due to estimated weighted half-lives for fibres longer than 20 µm at concentrations of ≥100 fibres/cm ³ it seems plausible not to apply the Nota Q. A reasoning why Nota Q (in the text passages in 4.9.4 and 4.9.6.) would be helpful for transparency.				
p. 29 The hazard statement H350i needs consideration. Criteria say that a route could only be stated if proven that no other routes of exposure cause the hazard.				

Attachment:

1. **Comments on the dossier proposing Harmonised Classification and Labelling of the substance Special purpose E-glass fibres** submitted by:
Industry or trade association from Belgium on 17/04/2013
PPG Industries (UK) Ltd, Fiber Glass Division from UK on 17/04/2013
European Owens Corning Fiberglas SPRL from Belgium (word doc) on 17/04/2013
Company-Manufacturer from Germany on the 17/04/2013
PPG Industries Fiber Glass BV from Netherlands on 17/04/2013
2. **Comments on the dossier proposing Harmonised Classification and Labelling of the substance Special purpose E-glass fibres** submitted by
Company-Manufacturer from Germany on the 18/04/2013