

N°20017/2013/GIFAS
Paris, 23rd September, 2013

Subject: Answer on the DMF (N,N-dimethylformamide) substance

Y/Ref: Public consultation issued on 24th June 2013 on ECHA's 5th recommendation of priority substances to be included in Annex XIV

Dear Sir,

The European Chemicals Agency (ECHA) published a draft recommendation of 5 priority substances¹ for inclusion in the list of substances subject to authorisation (Annex XIV): Zr-RCF (Refractory Ceramic Fibres), Al-RCF, ADCA, 4-tert-OPnEO and N,N-dimethylformamide (DMF).

This letter constitutes the GIFAS (French aerospace industries association)² response regarding the **DMF substance** (CAS n° 68-12-2).

N,N-Dimethylformamide (DMF) is identified as a Substance of Very High Concern (SVHC) and is classified as toxic for reproduction, Repr. 1B.

The Aeronautic and Aerospace Industry fully commits to environmental excellence, to the highest level of health protection and to REACH compliance. The sector has been working for years progressively moving away from some of the most hazardous substances when proper control cannot be assured.

Implementing an alternative solution requires stringent, long and intensive testing for qualification (reliability, test programmes). The implementation of the substitution roadmaps must be carefully, progressively and sequentially made, on a step-by-step approach, once alternatives are validated to ensure relevant lessons are learned prior to generalisation.

¹ Initially 6 priority substances but on July 5th the ECHA decided to refrain from including decaBDE in its draft recommendation for inclusion in Annex XIV.

² GIFAS has more than 300 members from major prime contractors and systems suppliers to SMEs. The French Aerospace sector comprises 170 000 direct employees and its turnover exceeds € 42.5 billion.

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Copy: *directly to the ECHA website*

DMF has multiple uses; mainly as a solvent at industrial sites in the Aeronautics, Space, Security and Defence sectors. Should DMF become subject to authorisation, its multiple uses would generate many different alternative implementations and no alternatives are yet available.

Our industry is highly concerned by DMF and an analysis has already been undertaken for substitution; however today no alternatives other than solvents with similar characteristics and equivalent dangers (other formamide, Dimethylacetamide (DMAC), N-Methyl-Pyrrolidone (NMP), dichloroethane ...) have been identified.

The regulation requires a threshold limit value for the DMF exposure of industrial workers. The exposure can be measured and therefore controlled. This type of regulation is more efficient. We consider that authorisation is not seen as the best regulatory process for DMF and therefore DMF should not be prioritised for inclusion in Annex XIV.

That is the reason why we ask ECHA not to give the prioritisation to DMF for inclusion in Annex XIV.

We remain at your disposal for any information you may require.

Yours faithfully,



Bruno COSTES

Chairman of the GIFAS Environment &
Sustainable Development Commission



Pierre-Stéphane BENATI

GIFAS REACH Working Group Leader