

Notes Wire coating Sector phone meeting xxxx RIVM Bureau REACH 20-12-2019

Attendees:

Mr xxx, Sweden, for xxx

Mrs xxx, Spain, for xxx

Mr xx, France, xxx

xx, Germany, xxx

Goal of meeting

Getting to know each other

For xxx important for them to define how to proceed with cooperation NL and information gathering

Set targets and make follow-up appointment

Introduction

xxx introduced the DMAC and NEP RoI entry and Call for Evidence and explained reasoning for focus on DMAC and NEP. Explained importance of direct consent and information sharing. Explained importance of link with NMP Restriction applicable for this sector from May 2024 onwards (May 2020 the DNELs apply to all other sectors) a 2 pager with initial concerns by this industry is already shared with us via ECHA.

We explain and discuss the CfE questions and at the end decide EWWG as a sector group will provide input on all questions but primary focus will be on Q3 and Q4. RIVM proposes to have a follow-up meeting discussing their draft response in the second half of February. This may be combined with a site visit.

Specific issues raised and discussed:

- They were involved in the NMP guidance development. Are they at the workshop in Antwerp in early next year? Yes and they are now informed RIVM is likely to be present (xxx).
- They are a sector of winding wire/magnet wire manufacturers (elektrische spoelen). Something completely different than cables. Several layers in orders of micrometer thickness needed on copper wire. Different layers needed. Wires are different than cables. Different industry from cable industry. Small and large motors, transformers etc. Winding wires for electrical motors.
- How many wire coaters: 10 in their association, 80% of EU production. All the biggest are members. 5 smaller companies are not members of the association but they use the same production processes and machinery.
- NEP was possible substitute for NMP. Was however wiped out based on toxicology reasons (regrettable substitution). Was introduced by enamel manufacturers which are their suppliers. So reformulation is done by them. NEP is not used today by enamel manufacturers. Three enamel formulators in the EU who supply the whole sector. They will ask their enamel manufacturers for alternatives assessment.

- Use by them: Polymers with solvents put together in enamel (formulation). Goes into production line, into ovens where solvents are evaporated. Serial production they call it but with several higher exposure PROCs such as enamel refilling, maintenance and cleaning.
- RMMs between 2012 and now and 2024 to come? Machines have developed being able to reduce emissions/exposure. The NMP prolonged transitional period was largely a time frame argued by the industry to be able to write down large parts of their older equipment. Since the discussion already took place in 2012, 12 years will have passed in 2024. Still they are not really clear whether they will be compliant with the NMP restriction in 4 years from now. DMAC is as NMP used in similar number of enamels
- Will measures taken to reduce NMP exposure also reduce exposure to DMAC which sounds logical? Yes, this will help. Q3 is most important for them. What will be the costs of implementation. They are also doing measurements. Reason for longer period is it is only achievable with new types of machines. Lifetime of machines is very long. Significant part of machine park. I would also like to understand how the newer machinery would reduce the exposure. They will explain this with examples and visibles etc.
- I explained to them the issue of implementation of RMMs between 2012 and 2024 and compliance with NMP restriction will be a very critical aspect in the RA and SEA. I advised them to carefully consider co-exposure to both solvents and how their target to comply with the NMP restriction will also help to be compliant with the DMAC restriction. If this does not help somehow this should be carefully explained.
- About BREFs: yes there is a BREF: Surface treatment using solvents (Solvent Based Deposition), contains a long section on winding wires. Will be sent to us. DMF has BREF for textiles, we knew this already.