**Consultation for a Proposal for RoHS Restriction of the Use of**

**MCCP in EEE**

**Questionnaire**

prepared for

**Swedish Chemicals Agency (KemI)**

30 September 2015



# Background information

The Swedish Chemicals Agency (KemI) wants to prepare a RoHS Annex II dossier for the restriction of use of MCCP in electrical and electronic equipment (EEE), in accordance with Article 6(1) of the RoHS recast Directive (2011/65/EU) and has commissioned Risk & Policy Analysts Ltd (RPA) for support.

We are contacting you to kindly request your assistance with the collection of relevant information regarding these tasks and we would be grateful if you could assist us by answering the questions in this questionnaire. It is very important that you consider and provide information on:

* Any use of MCCP or MCCP-containing products (mixtures / articles) that takes place within the EU, including, where available, the respective tonnages
* The presence of MCCP in mixtures or EEE articles of non-EU origin which are placed on the EU market.

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| Alkanes, C14-17, chloro (CAS No: 85535-85-9, EC No: 287-477-0), otherwise known as Medium-chained Chlorinated Paraffins (MCCP) are a group of organic substances with a carbon chain length between 14 and 17 containing varying amounts of chlorine, typically ranging from 40-63% w/w[[1]](#footnote-1) chlorine content. MCCPs are extensively utilised in flexible PVC, commonly used for EEE cable sheathing and insulation. The lower volatility of higher chlorination MCCP analogues is compatible with PVC. An estimated 9,200 tonnes/year of MCCP is used for cable products. Use of MCCPs in other plastics is primarily as a flame retardant additive (70-72% wt. chlorination). |

**Thank you in advance for taking the time to complete this questionnaire**

Please email your completed questionnaire

by **10 November 2015**

to **Mr Byron Georgalas** at RPA

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| Byron GeorgalasRisk & Policy Analysts Ltd.Farthing Green House,1 Beccles Road, Loddon, Norfolk, NR14 6LT, United Kingdom | Telephone: +44 1508 528465Fax: +44 1508 520758E-mail: Byron.Georgalas@rpaltd.co.uk website: <http://www.rpaltd.co.uk> |
| **ATTENTION – CONFIDENTIALITY ISSUES****The correct handling of confidential information is of paramount importance to RPA. RPA and KemI are willing to accommodate justified requests for confidentiality, including the complete anonymity of your submissions, as long as this does not adversely affect the transparency and robustness of the RoHS restriction dossier under preparation. Before you complete and submit your questionnaire, please ensure that you have read our Confidentiality Note.** **Please tick the grey box to the right to confirm that you have read this note and you are satisfied with the procedures outlined.****Also, note that each question in this questionnaire allows you to mark your responses as confidential** |  |

# Company information

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| Table 2‑1What is the role of your company? |
|  | Tick here if relevant | Provide some brief detail on your activities |
| Manufacturer of MCCP |  |  |
| User of MCCP in materials |  |  |
| Downstream user of materials containing MCCP / EEE manufacturer |  |  |
| Waste (WEEE or plastics) management company |  |  |
| Importer/Distributor of MCCP |  |  |
| Manufacturer/Importer of alternative |  |  |
| Industry association |  |  |

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| Table 2‑2Details of your organisation |
| Organisation name: |  |
| Relevant sector / NACE Code: |  |
| Address: |  |
|  |
| Web page: |  |
| Contact person: |  |
| Telephone Number: |  |
| E-mail address: |  |
| Is your organisation an industry association (Yes/No)? |  |

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| Table 2‑3If you indicated that you represent an industry association |
| Question | Details |
| What is the nature of the businesses you represent? |  |
| How many individual companies does your response represent? |  |
| What share of the relevant EU market do your members cover? |  |
| In which countries are your concerned members located? |  |

# Market information on MCCP

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| Table 3‑1**Provide the annual tonnages of MCCP that your company manufactured or imported in the EU in 2014.** |
| Form of MCCP | Volumes (in tonnes) |
| In 2014 | Change in tonnages (%) since 2009 | Envisaged change (%) in next 5 years |
| As substance |  |  |  |
| In plastics |  |  |  |
| In EEE |  |  |  |
| Other (describe)… |  |  |  |
| If you are an importer, state the non-EU manufacturing location(s) |  |
| Please describe the reasons for the past and future trends in the tonnages indicated above |  |
| Please describe the products that contain MCCP handled by your organisation  |  |
| **Is this confidential information?** |  |

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| Table 3‑2**Indicate how the substance is used in your organisation (in relevance to EEE)** |
| Describe the MCCP-related processes in your organisation | Quantities of MCCP used | Concentration (% w/w) | Form of final product |
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| Please describe the downstream uses of the final product from your organisation and their share |  |
| If you are using materials or components that might contain MCCP are you aware of its presence and content? |  |
| **Is this confidential information?** |  |

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| Table 3‑3**For the uses you have identified above, please provide an indication of:*** **The associated turnover in Euros to your company from the sales of MCCP or MCCP-related products in the EU (you may wish to break this information down by end use)**
* **Your estimated market share in the EU**
* **The identities and locations of any key competitors.**

**Also, it would be useful if you could indicate the market price per tonne of MCCP** |
| MCCP-related product and uses | Economic value to your company (€ million/y) | Estimated EU market share per use (%) | Key competitors (and their locations, country) |
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| Indicative MCCP price  | €/t |
| **Is this confidential information?** |  |

# Other information

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| **Table 4‑1****If you feel that we have missed anything important, or would like to comment on any of the issues raised by this questionnaire, please let us know (and continue on a separate sheet, if required)** |
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| **Is this confidential information?** |  |

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| **Table 4‑2****There is going to be a second round of consultation in the spring of 2016. It will request information on alternatives, exposure and WEEE treatment.****Will you be willing to be contacted again with another questionnaire?****If you have any preliminary information on these subjects at hand, please feel free to provide them below.** |
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| **Is this confidential information?** |  |

1. ECB (2005), *European Union Risk Assessment Report – Alkanes, C14-17, Chloro (MCCP) – Part I - environment*, European Commission, EUR 21640 EN, Volume 58, Luxembourg: Office for official publications of the European Communities [↑](#footnote-ref-1)