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BCA Environmental Newsletter Update – June 2016

In this issue of the BCA Environmental Newsletter, we look at the recent developments in the UK and European Environmental Directives and provide an update on the possible impact on member organisations.

BCA members are reminded that the legislation in respect of environmental matters is generally developed within the European Commission with the Europacable Environmental Committee (ECOE) providing an interface to the EU Committee structure.

UK environmental legislation continues to reflect the proposals developed by the European Commission unless there are compelling reasons requiring the introduction of national requirements.

The focus in the UK and Europe on environmental matters continues to grow with the legislation on HSE, the assessment of materials and the evaluation of substances increasing.

The following information will be of interest to BCA members as it provides an update on the environmental matters which may have an impact on the cable manufacturing sector.

1. Europacable Organisational changes

Antonio Traversi and members of ECOE the Europacable Environmental Committee have completed a detailed review of the scope and key objectives and presented the proposals to the Executive Board in the meeting held on 24th May 2016.

The proposals recognised the Europacable Industry Charter and the decision to focus the future activity of Europacable around three Core Business related areas detailed below:

- EU Energy Union
- EU Digital Single Market
- EU Industry Policy

The core areas will be supported with additional input on the following areas:

- Health Safety and Environmental Issue Management
- Communications

Europacable will focus on dedicated issues which are relevant to the Businesses of their members with a Leadership team overseeing responsibility for the specific working groups. It is intended that each sector will include an assessment of the environmental matters requiring attention by ECOE.

Following the presentation to the Board work is now under way to finalise the new organisation for the meeting of ECOE on 22nd September 2016.

The new structure of ECOE will include a Leadership team consisting of Europacable Member Companies to ensure the work of ECOE is able to address the relevant environmental matters that are having an impact on the industry.

The new ECOE structure will include four Working Groups as follows:

- Legislation of Substances and Materials
- Legislation for Plant and Equipment
- HSE Guidance and Communications
- Environmental standardization

(In future BCA's Environmental briefings will use these headings)

Over the coming months the detailed scope and objectives will be clarified with the Working Group Convenors and BCA members will be updated as the information becomes available.

2 REACH

2.1 ADCA (Azodicarbonamide)

BCA members are aware of the proposals to restrict the use of ADCA (Azodicarbonamide) as a foaming agent for use in the manufacture of cables and the protracted discussions within the European Commission.

BCA supported ECOE members with the submission of comments during the consultation process and was involved with Orgalime, REACH Centrum, EuPC and CEFIC to develop a case for the authorisation to allow the continued use of ADCA until a suitable replacement product is available.

The use of ADCA as a foaming agent in the production of certain telecom and data cable is important and although there are no reported HSE issues in the manufacture of cables there are concerns over the possible impact on the health of personnel in the production of the ADCA compound and the manufacture of ADCA Gel.

It is now reported that the proposals for restriction for the use of ADCA may not be implemented, or may be delayed to a later date to enable more work to be undertaken on the technical evaluation.

Whilst the Commission has not formally confirmed this information it is reported that there will be no imminent restriction on the use of ADCA but the development of alternatives will still be the longer term objective.

BCA members are advised to maintain contact with their existing provider for ADCA and Europacable will continue to seek a confirmatory statement from DG Environment.

Whilst the manufacturers of ADCA continue development work on a replacement material the Europacable Executive Board has endorsed a proposal to retain Chemservice (Luxembourg) to provide technical support on developments on the use of ADCA.

2.2 REACH – Public Consultation – Substances

ECOE representatives have continued to press the ECHA and European Commission on the consultation process for additional substances that may be subject to restrictions. The following substances used in the production of cables are of interest to BCA members:

- Orange Lead
- Boric Acid
- Lead Monoxide
- Polyaromatic hydrocarbons (PAH)

Whilst the consultation process for Boric Acid and Lead Monoxide remains under discussion the news on Orange Lead and PAH is more encouraging.

A recent report from the Consultants assessing Orange Lead initially indicated that it should not be included in the current authorisation list and may therefore continue to be used.

However, one Member State has now made a further recommendation to include it in the next consultation process stating that additional technical information is now available to justify limitations on its use. The consultation process will therefore delay any possible restrictions on the use of Orange Lead.

Polyaromatic Hydrocarbons (PAHs) are used in the production of cables as a component part of carbon black used in compounds and were listed under Annex XVII of REACH and therefore subject to authorisation.

The legislation was initially proposed to restrict the use in products intended for toys and household goods to minimise the risk of contact with skin or mouth. The concentration levels of the PAHs used in carbon black (Chrysen and Benzoapyrene) is extremely low.

Cables are not included in the list of products identified in the list of products of concern and Europacable has advised members that the use of the identified PAHs should therefore have no impact on members.

BCA members are however advised to contact that the suppliers of carbon black to confirm that their products are fully compliant with the legislation.

As with all legislation on environmental matters, any Member State can submit proposals for substances to be evaluated and this may well continue for some time.

3 RoHS

3.1 RoHS – Additional Substances

BCA members may recall the use of PVC has been subject to environmental assessment over many years and that attempts to restrict the use, due to environmental concerns, has not been successful.

More recently the use of MCCP (Medium Chain Chlorinated Paraffin) has attracted attention with the appointment of RPA Environmental Consultants to undertake an assessment of MCCP. The initial proposal for the work was made by the Swedish Chemicals Agency.

BCA members will be aware that MCCPs are used as a plasticiser and flame retardant material in the manufacture of PVC cables and ECOE provided basic information on the common products using PVC.

The second phase of the consultation is to gather information on the volumes of cables using PVC and the collection of information on the following subjects:

- Waste management
- Environmental exposure
- Alternatives to MCCP

BCA members may be contacted by RPA Consultants for information as Europacable are unable to provide data on market volumes or on the use of MCCP in the manufacture of cable.

4 Eco Design Directive

Following the extensive consultation process by VITO as part of the Eco Design Directive for Power Cables the draft report was completed earlier in the year and recommended that no major work was required to improve the design or energy efficiency of Power Cables.

The report recommended that the design of electrical installations and the use of energy efficient equipment be considered with Architects, Electrical Consultants and Engineers taking action to improve the energy efficiency of installations.

On the basis of this information no action is required by BCA members.

The formal report has not been issued and despite representations from Europacable a final date for publication and acceptance by the Commission is not available.

Europacable will continue to seek confirmation of the conclusions contained in the report to bring the work on the project to a close.

CCG members will recall the proposal to assess the energy use of Data Centres as part of the Eco Design Directive. Information from CCG members and Europacable was submitted to the Consultants.

The recommendation from the Consultants is that whilst the energy use of Data Centres should be assessed in more detail primarily due to the energy used by Air Conditioning systems there are no proposals that will have an impact on the design of data cables.

5 Orgalime

5.1 REACH 2017 Review

Orgalime is developing proposals designed to reduce the bureaucratic burden on European Manufacturers with the submission of a paper for the 2017 review of REACH.

ECOE will provide the input from BCA via the Europacable submission with the following areas currently identified as topics requiring attention:

- Simplification of the REACH registration process
- The inclusion of SVHCs on the Candidate list
- Consistency between REACH and RoHS on the restriction process
- Simplification of REACH Authorisation
- Safety Data Sheet requirements
- Simplification on RMO-As (Risk Management Option Analysis)

The objective of Orgalime is to reduce the level of administration and complexity on environmental legislation and to focus on the simplification of the current processes.

5.2 RoHS – “China RoHS 2”

Orgalime has recently expressed concerns over reports that China is developing proposals setting out the Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products in China.

Concerns over the lack of clarity in the scope of the new provisions known as “China RoHS 2” have been voiced and that the measures may become a technical barrier to trade to manufacturers in the EU.

It is reported, although not confirmed, that the measures contained in the scope may be enlarged from those in the EU RoHS scheme and require specific requirements for product to be used in China.

BCA members have for many years exported product to China and Hong Kong and should therefore be aware of the developments. Information received from members will be included in the Europacable input to Orgalime who are seeking clarification from the European Commission.

6 BSI GEL / 111 Environmental Committee

The level of activity in the BSI Environmental Committee (GEL/111) has again increased and now continued with the use of interim WebEx meetings and conference calls to address specific topics and voting intentions in addition to the physical meetings held in Chiswick.

The recent meetings of BSI / GEL 111 have included the following items for discussion:

- IEC TC 111 Standardization roadmap on regulated substances
- IEC TC 111X WG7 – Requirements for the preparation for the re use of waste electrical equipment.
- EN 50625 - Collection, logistics and treatment requirements for WEEE
- Eco Design Directive
- BS EN 50625-1 - WEEE Directive
- BS EN 62321 – Determination of Substances in Electrotechnical products
- IEC 62474 - Material Declarations for Electrical Equipment
- Environmental Conscious Design (ECD) – Principles and Guidance

The next meeting of BSI / GEL 111 will take place on 22nd September 2016.

Further information on environmental matters is available from the BCA website and from Mr Nash.

Previous Environmental Newsletters

Previous environmental newsletters are available in the restricted (Members-only) section of the BCA website (www.bcauk.org).

BCA members are reminded that the access details for the **Member's-only** section of the BCA website have now been changed; Paul Sweet can provide the username and password details if you do not already have them.

Information contained in the BCA Environmental Newsletter includes reports from other organisations and whilst care is taken to confirm the accuracy of the information members are advised to seek additional further advice if required to contact BCA staff.

Environmental Update Issue Date
September 2010
March 2011
September 2011
March 2012
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