Contribution to the divanadium pentaoxide CLH Public Consultation. November 2019.

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Introduction

The Frit Consortium is the organization that manages the REACH and CLP obligations of companies that manufacture or import frits into the EU. The Consortium currently includes 34 members from different European countries, mainly Spain, Italy and Germany. The members of the Frit Consortium are the largest producers in Europe for frits.

Frits are chemical substances, result of a mixture of inorganic chemical substances (typically consisting of metal oxides and salts) produced by rapidly quenching a molten, complex combination of materials, confining the chemical substances thus manufactured as nonmigratory components of glassy solid flakes or granules. Divanadium pentaoxide and other vanadium compounds are used as important raw materials for some specific types of frits and cannot be substituted. During the manufacturing process, raw materials are transformed via melting and the resulting substances contain vanadium ions confined into the vitreous structure of the frit. These substances are exclusively manufactured at industrial sites by trained workers and their main end uses are ceramics, glass and metals.

The Frit Consortium fully supports the scientific and technical position of the Vanadium REACH Consortium in relation to the current Public Consultation to modify the existing entry for divanadium pentaoxide in Annex VI of the CLP Regulation.

Impact of the CLH proposal in our sector

The proposed harmonised classification and labelling for divanadium pentaoxide would have a negative impact in our sector mainly due to its use as raw material, but also due to potential stigmatisation of vanadium-containing frits.

The following main consequences have been identified:

- Changes in the manufacturing and handling practices
- Market impact due to stigmatisation of all substances and mixtures containing divanadium pentaoxide
- Stigmatisation of articles containing vanadium substances, even if they are bound in a matrix and thus not biologically available
- Changes to labelling, packaging and eSDS
- Additional investment and/or equipment costs
- Additional RMMs required
- Possibility for a future authorisation or restriction under REACH affecting vanadium-containing frits

- Possible precedent setting for classification outside the EU
- Impact on other related legislation (e.g. waste, occupational health and safety legislation, etc)
- Impact for other raw materials where divanadium pentaoxide may be present as an impurity

All the above would result on an increase of operational costs and loss of competitiveness face to our competitors in the rest of the world and may trigger delocalisation.