

20<sup>th</sup> September 2013

**Europacable contribution to the public consultation on  
Azodicarbonamide (ADCA)**

Dear Sirs,

Europacable represents a significant number of manufacturing organisations in Europe who produce a wide range of cables and accessories including Data, Telecommunication, Energy and other Special products.

A number of our member companies have invested heavily in the technology to produce Power, Telecommunication and Data products to meet the growing demand from users.

Azodicarbonamide (ADCA) is used in the manufacturing processes for some cables, which demand specific, high protective insulation. Europacable is aware that ADCA was recently identified as a Substance of Very High Concern (SHVC) and is under consultation for inclusion in the Annex XIV (substances subject to authorization).

Europacable is concerned that having discussed the issue with suppliers of ADCA there are currently no substitute products available to replace ADCA and in the event that the use of this substance is restricted it will have serious implications on the future availability of Power, Telecommunication and Data cables produced in Europe.

The restriction of ADCA without a replacement material would limit the availability of Power, Telecommunication and Data Cables with this high protective insulation and have an adverse impact on the growth in these markets with serious financial implications for the manufacturing companies and users of these products.

Europacable is aware that manufacturers of ADCA have expressed their concerns which are shared by many of the users of this product.

As responsible manufacturers of cables, Europacable considers Health and Safety initiatives as important issues and supports improvements to protect the environment and users of materials.

However the current proposals will have a major detrimental impact on the manufacture of the identified products as long as there is no similar alternative and will have significant implications for the future deployment of communication systems in Europe.

***Therefore, Europacable would like to urge ECHA not to include ADCA in the upcoming recommendations of substances that should be subject to authorisation.***

With kind regards



Thomas Neesen  
Secretary General