

Europacable Position Paper: Cable Sheath to be considered as “mixture” under REACH Article definition

Brussels, 8 February 2019

Summary

Europacable, the voice of Europe’s leading wire and cable manufacturers, opposes the interpretation provided in the EChA presentation “Articles in complex objects: illustrative examples” which considers cable sheaths as an article similarly to insulated wires. Europacable believes that both sheath and insulation must be considered as mixtures which are applied like thick coating on the conductor wire. For this reason, Europacable is seeking EChA’s confirmation that any communication on the presence of SVHC in the cable must consider the concentration in the cable and not in the different layers of which it is composed of.

Accordingly, Europacable calls upon EChA to reconsider its interpretation.

Articles in complex objects presentation

The EChA presentation [“Articles in complex objects: illustrative examples”](#) delivered by Mr. Telmo Vieira Prazeres Scientific Officer at EChA in November 2017, provides an illustrative example of a complex article and communication duties regarding substances in articles.

In this example, the power cable is presented as a “complex object” made of two articles

- The insulated wire; and
- The cable sleeve.

Europacable opposes the above-mentioned interpretation and call upon EChA to reconsider their position based on the following input:

Cable Manufacturing process

The cable manufacturing process starts from a copper or aluminum wire which is insulated during an extrusion process. In this step, plastic granules or compounds (yellow on Figure 1) are melted and applied on a copper wire (Orange on Figure 1).

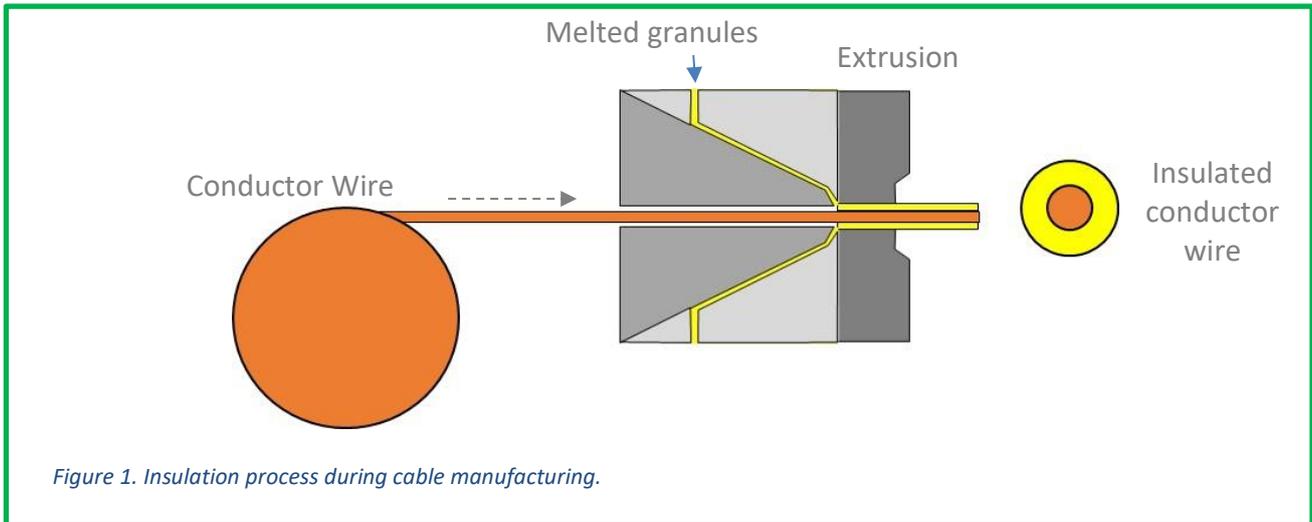


Figure 1. Insulation process during cable manufacturing.

The sheath applied on the insulated wire is applied using the same extrusion process of melted polymer granules (blue), either in a second step (See Figure 2) or in the same process as insulation (see Figure 3).

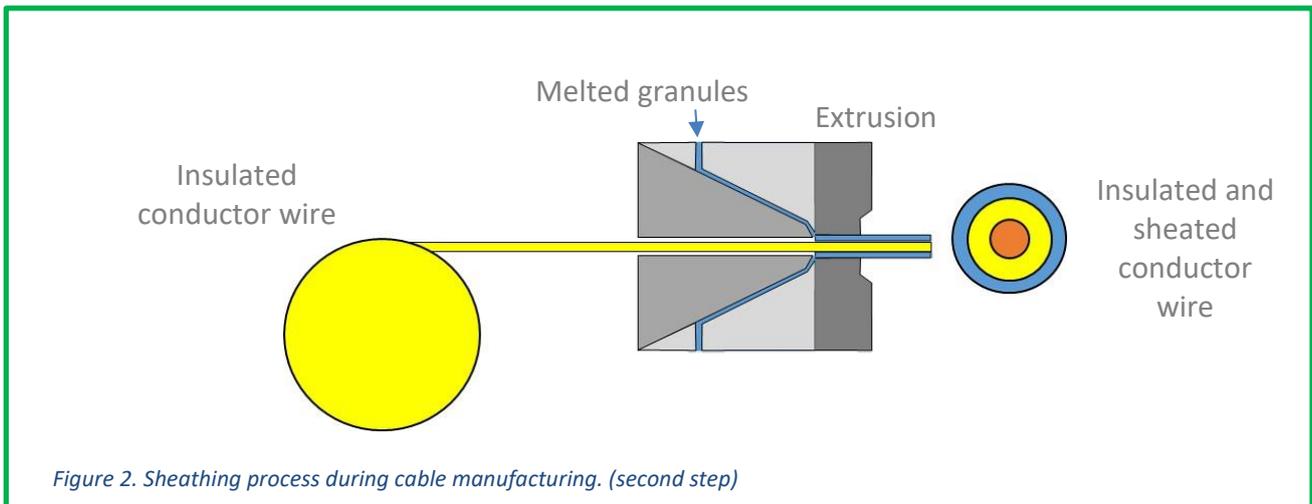


Figure 2. Sheathing process during cable manufacturing. (second step)

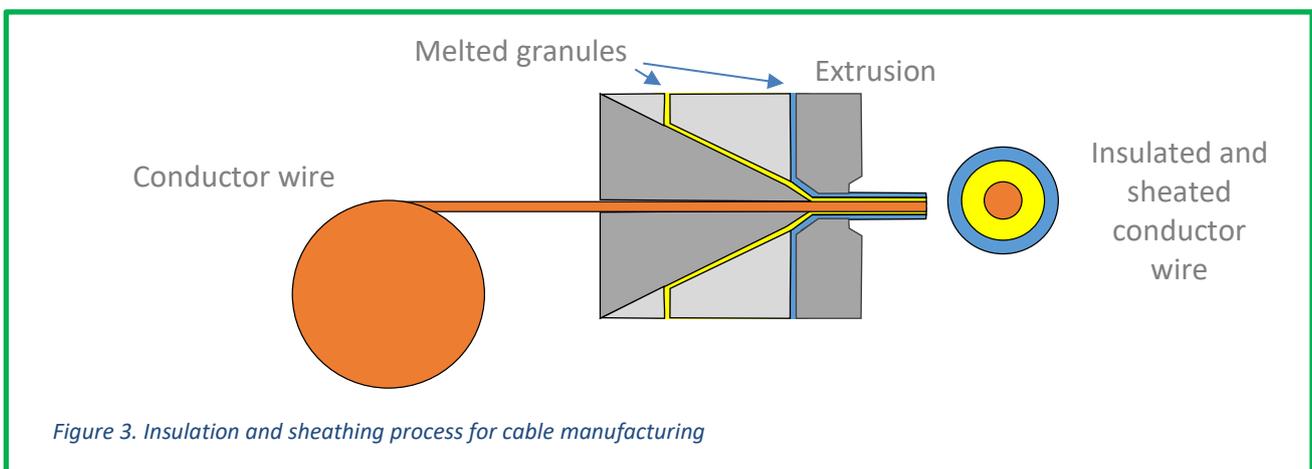


Figure 3. Insulation and sheathing process for cable manufacturing

The sheath (or sleeve) does not exist prior to its application on the insulated wire. It follows the same process as the insulation, and both could be compared to a thick coating applied on the copper wire.

Decision tree on object status

The ECHA Guidance on requirements for substances in articles (V4.0), published in June 2017, provides in chapter 2.3 a decision tree to identify if an object is an article or not.

Following this decision tree, Step 2 contemplates whether shape/surface/design are more relevant for the function than the chemical composition. As far as insulation and sheath are concerned, technical standards on cables usually specify their thickness, materials, mechanical and electrical properties. Based on this consideration, it can be stated that the sheath chemical composition, including mechanical and electrical properties, is considerably more relevant than its shape and/or design.

It may be concluded accordingly that the sheath (and the insulation) should be considered as substances or mixtures directly applied on the conductor.

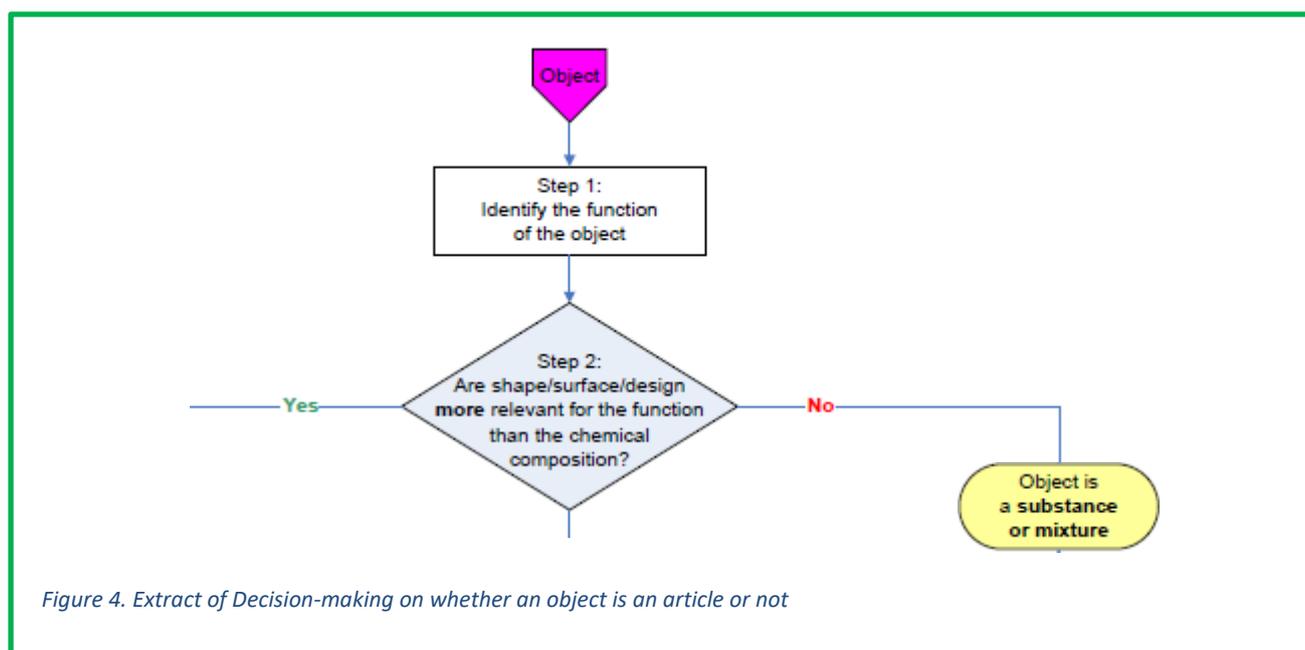


Figure 4. Extract of Decision-making on whether an object is an article or not

Notification for coated articles

Explanations in chapter 3.2.2 “Notification of Candidate List substances” provide additional support to our interpretation.

According to example 6 – scenario 3, an article is coated with a paint containing a SVHC. It is clearly explained that in the notification process that the coated article is considered as an article and not as a complex object. In particular, coating has no specific function if separated from the uncoated article.

The same applies for to insulation and/or sheath, which is comparable to a coating applied to ensure the final properties of the conductor wire.

Conclusion

Europacable believes that the sheath and insulation applied on copper wires through extrusion process must not be considered as articles BUT as substances or mixtures, which will support the final article to reach the standardized properties.

As a consequence, Europacable is seeking EChA's confirmation that, should communication of SVHC present in cables be necessary, such communication must be based on the concentration in the cable and not in the different layers of which it is composed of.

For additional information, please contact:

Alberto Lampasona
Manager Public Affairs
Email: a.lampasona@europacable.eu

About Europacable

Europacable is the voice of all leading European wire and cable producers. Europacable members include the largest cable makers in the world providing global technology leadership, as well as highly specialized small- and medium sized businesses from across Europe. Globally our members employ over 80.000 people of which more than 50% in Europe generating a worldwide turnover over € 70 billion in 2017. The product scope of our members covers the full range of energy and communication cables. Europacable is listed in the European Commission's transparency register under 453103789-92. We are a partner of CENELEC.

www.europacable.eu