RACCOMANDATION FOR EXEMPT OF COBALT SULPHATE FROM ANNEX XIV

PRIORITY

The factor calculated (high: 14-15) is considered to be disproportionate.
In particular, the value for substance dispersion (environment, workplace and end-users) (3) appears excessive. Since the use of dangerous chemicals is regulated and subject to the control of chemical risk (for example in Italy, Legislative Decree 81/08) a score of 1 is proposed. Referring to the galvanic industry, the risk of exposure to cobalt sulphate is not significant because of the extremely small quantities used.
Consequently, the proposed new priority value for the substance is:

	Value rationale	Motivation
Inherent properties (IP)	0-1	0= CMR with effect threshold 1= CMR without effect threshold
Volume (V)	5	Relatively high: 100-1000 t/y
Uses: wide dispersiveness (WDU): 3*1=3		
Site #	3	high
Release	1	Non-diffuse/controlled

Total value:
TOT = (IP) + (V) + (WDU) = (0-1) + (5) + (3) = 8-9 moderate priority

DATE

Since cobalt sulphate is considered not to be included in Annex XIV, new deadline and sunset date are proposed to be set whenever more detailed information are available about the intermediate definition and the any possible replacement substances to cobalt salts.

COMMENTS ON THE WILLINGNESS OF EXCLUSION

Cobalt sulphate is used in the galvanic industry not as raw material but as a mixture provided by third-party companies. The preparation is used in making/integrating water solutions utilized in "sealing" operation of final products. In particular, the mixture is diluted until the concentration varies from 0.1 to 0.5%. Professional exposure during processing is not significant because of the quantities used. Moreover, operational procedures and chemical analysis are required by law in the workplace.
The spontaneous release of cobalt salts from final products appears to be non-significant. This would mean that, at least in the galvanic industry, the global diffusion of contaminant in normal conditions of use would be negligible. A time range is desirable in order to conduct a complete survey on potential release.
The current state of industrial research does not propose alternative substances (of minor threat) able to provide the same performance in terms of quality and durability of the final product. In addition, the lesser durability will create more waste and the need for more recycling.

An alternative technology (as qualitative as the present) will not be available before 10 years ahead.
In the galvanic industry, cobalt sulphate is used in a particular treatment bath called passivation. The process consists of plating an article with a protective film (few µm) to improve corrosion resistance. The articles involved in this type of process belong to metal smallwares category. All market sectors are concerned (domestic and industrial tools, indoor/outdoor furnishing, cars, electronics, computer, etc).
Therefore, the high commercial and socio-economic importance of cobalt sulphate in the galvanic industry is evident. Since in Italy the average size of the approximately 2000 galvanic companies is small to medium, the possible inclusion of cobalt sulphate inside of annex XIV would entail additional costs hardly sustainable by factories already affected by the current recession climate. It is therefore conceivable that the renunciation of the use of cobalt salts, would result in exiting the business to the advantage of non-EU competitors. The competitiveness of Italian and EU companies, in other words, would be damaged.
For all the reasons above, it is suggested that at least the use of cobalt sulphate in the galvanic industry should be exempt from any authorization.