

Why Superwool™ 607™ HT?

The Hazard Classification of Man-Made Vitreous (Silicate) Fibres in the European Union



Fact sheet 1

Introduction and Key Points Summary

In 1997 the European Commission added Man-Made Vitreous (Silicate) Fibres (MMVFs) to the list of dangerous (hazardous) substances under the European Union Directive 67/548/EEC¹. This Directive classifies substances according to their specific hazard and sets out requirements for hazard communications to users through packaging, labelling and Material Safety Data Sheets. The classification framework for MMVFs is complicated, but may be summarised for the purposes of this factsheet as:



- Some MMVFs are classified as category 2 carcinogens (substances which should be regarded as if they are carcinogenic to man).
- Most commercial MMVFs are classified, by default, as category 3 carcinogens (substances which cause concern for man owing to possible carcinogenic effects). However, these MMVFs may be exonerated from category 3 carcinogen classification if they meet certain criteria in the Directive².

For high temperature insulation wools, this framework classifies Refractory Ceramic Fibres (RCFs) as category 2 carcinogens and exonerates the Superwool range of products from any carcinogen classification.

The Consequences of Carcinogen Hazard Classification in the European Union

Classification of RCFs in the European Union as category 2 carcinogens triggered a number of downstream regulations both across the European Union and in individual Member States. These require measures to be taken by Member States to restrict the use of and control exposures to RCFs in order to minimise possible adverse impacts to human health and the environment.

The measures include:

- Prohibiting manufacturers and suppliers from placing RCFs on the market for use by the general public (Directive 76/769/EEC).
- Requiring employers using RCFs to seek a substitute which would present a lower risk to the health of workers, or to contain the RCFs and implement measures to reduce occupational exposure to the lowest technically achievable (Directive 2004/37/EC).
- Handling and disposing of waste RCFs from manufacture and use as hazardous substances, by a licensed waste contractor and in an appropriately licensed landfill (Directives 91/689/EEC and 1999/31/EC).

These downstream consequences have applied to the marketing and use of RCFs since their classification as category 2 carcinogens, and have resulted in increased costs of compliance for manufacturers, suppliers and users of RCFs.

They do not apply to the Superwool range of products³.

¹ As amended by European Commission Directive 97/69/EC

² See Notas Q and R of Directive 67/548/EEC

³ Superwool meets the criteria for exoneration from carcinogen classification in Nota Q of Directive 67/548/EEC

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Additionally, European Union Member States have the right to implement their own worker protection measures, such as the setting of Occupational Exposure Limits. Many Member States have introduced lower Occupational Exposure Limits for MMVFs since the 1997 classification.

Some of the low Occupational Exposure Limits set, or proposed, in Europe for RCFs are not practicable.

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For many years the European high temperature insulation wool industry association (ECFIA ⁴, www.ecfia.org) has had a Product Stewardship Programme, which includes:

- Human effects research: such as sponsoring human health surveys and research on the biological effects of fibres.
- Exposure assessment: study of workplace controls and workplace monitoring. (These aspects of product stewardship in Europe are known as the CARE programme for **C**ontrolled **A**nd **R**educed **E**xposure).
- Product research: the search for new materials which might release less dust or meet the requirements for exoneration from carcinogenic classification.
- Special studies: research on such subjects as waste, production of communication bulletins on the above efforts, material safety data sheets, safe handling guidelines etc.

The development and marketing of Superwool 607 HT is a result of Thermal Ceramics' commitment to this Product Stewardship Programme. Superwool 607 HT is the latest high temperature insulation wool in Thermal Ceramics' Superwool product range and the first that offers a technically and economically feasible alternative for the majority of RCF applications.

⁴ Member companies of ECFIA manufacture and supply RCFs and other high temperature insulation wools



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