

19<sup>th</sup> July 2022

## **Consultation on the draft risk management evaluation for UV-328**

Being a cross-sector association with member companies operating in different industries and stages in the supply chain, JBCE welcomes the opportunity to contribute to the consultation on the draft risk management evaluation to 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (hereinafter “UV-328”).

JBCE strongly supports the Stockholm Convention and its objective to protect the environment and human health. At the same time, we also greatly support a risk assessment approach with regard to the use of chemical substances.

### **Applications**

UV-328 is used not only in the automobile sector but also in various sectors such as the construction sector, plastic sector and electrical and electronic equipment. Optical films and materials containing UV stabilizers have superior transparency, visibility, and durability and are important for electronic displays in automotive, medical, and industrial applications. Electronic displays are commonly used for both consumers and medical applications. We would like to emphasize electronic displays such as personal computers and monitors for diagnostic imaging and medical data management. If UV stabilizers did not work well, that would affect the deterioration of the screen of electronic displays. This might cause serious concerns for human life by incorrect recognitions, judgments, and/or operations due to unclear screen in case of the medical imaging devices.

### **Alternatives**

Since UV-328 is used to block specific UV, the first performance for investigation is the UV absorption spectrum of the alternatives. However, this does not mean that it is sufficient the absorption spectra should be similar. The UV stabilizer is not used alone but is used by adding to the other components. Therefore, not only the performance of UV absorption and durability, but also the compatibility with the main components is important. Furthermore, the durability as the total composition should be assured under the actual external environment as not only light but also with ozone, water, humidity, dust. Since some of outside application (e.g. automotive, ceiling for stadium) is required 10 years durability, it takes a very long time to evaluate and guarantee the performance.

In addition, the German authorities (Bundesanstalt für Arbeitsschutz und Arbeitsmedizin, BAuA) have recently announced that they concluded that phenolic benzotriazole UV stabilizers (CASRN: 3147-75-9, 70321-86-7, 73936-91-1, 2440-22-4, 3896-11-5) should be followed up by SVHC based on RMOA (Regulatory Management Option Analysis). Some of industrial stakeholders may have already started R&D feasibility study of these UV stabilizers as an alternative of UV-328. We kindly request that the authorities would take into consideration for the sufficient risk assessment based

on the application and risk of the exposure. Otherwise, this will cause huge confusion to the all of the value-chains.

### **Exposure**

Since the UV stabilizers are fixed to the polymer materials of the screen for electronic displays, the chemicals are not exposed to the outside. The product life of the electronic displays have been controlled by the Directive on Waste Electrical and Electronic Equipment: (WEEE, 2012/19 / EU). Since the products are well disassembled and recycled, the exposures and impact on the human the environmental will be very small.

### **Transition period**

UV stabilizers as UV-328 is usually added to other components as an ultraviolet stabilizer to ensure durability against sunlight. Since it takes time for evaluate the durability against sunlight, an accelerated test using a xenon lamp is preferably used. There are several industrial standards and methods (e.g. ASTM D4355, ASTM G155, ISO 11507, ASTM D4459, PV 1303, PV 3929, ASTM D5071, SAE J2527, VDA 75202) However, some industrial products require over 10years durability. Even accelerated testing by using xenon lamps need for more than several months. After alternative chemical substances are available on the market, it will take 2-4 years for research and feasibility study on alternative materials.

Replacement by alternatives must be proven whether it can also be a substitution for final product. For final products, it is necessary to carefully evaluate whether the required performance, quality, reliability, safety and durability of the final products can be achieved with alternative substance. In order to guarantee the weathering test, the evaluation for the replacement of UV stabilizers will take more time than studies on general chemical substances. Studies on alternatives usually takes approximately 5 years for 1 cycle evaluation. If it were found that some of the performances did not reach the requirement of the products, it might take 10 years due to 2 cycles.

For this reason, we suggest **a sufficient transition period should be necessary for replacement.**

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### **About JBCE**

Created in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of more than 90 multinational companies of Japanese parentage active in Europe.

Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, steel, textiles and glass products.

Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities, which we perform under several committees focusing on: Corporate Policy, Corporate Social Responsibility, Digital Innovation, Environment & Energy, Standards and Conformity, and Trade.

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