## Background

ECHA is preparing a REACH restriction proposal on medium chain chlorinated paraffins (MCCP) and this project is looking to gather information on the use of metalworking fluids (MWFs) [[1]](#footnote-2) containing MCCP. MCCP should be understood as chlorinated paraffins with a carbon chain length between C14 and C17 (aka C14-C17 congeners). The scope of the investigation covers any substances or mixtures that would contain C14-C17 congeners. This questionnaire aims to obtain information on the technical function of MCCP in MWFs, the types of products made and the sectors in which they are used, as well as the availability of potential alternatives. The other aspect of this questionnaire relates to understanding how your company is likely to respond to different restriction proposals and the impacts of these restriction options.

## Questionnaire – Downstream users

1. **Please provide your contact details.**

|  |  |
| --- | --- |
| Contact name |  |
| Role in company |  |
| Name of company |  |
| Preferred contact phone number |  |
| Email address |  |
| Location of company |  |
| Main activity of company  |  |

1. **Please describe the type of MWFs used by your company and the type of metalworking that they are used for.**

|  |  |
| --- | --- |
| Please provide detailed information on specific metalworking operations undertaken by your company that require the use of MCCP-based fluids (including process details, such as temperature, pressure etc).Also, where relevant please indicate whether MCCP-based fluids are used only for certain types of application materials (e.g., stainless steel sheets with certain thickness, etc) |  |
| What is the technical function of MCCP? |  |
| Please detail the reasons for continued use of MCCP-based MWFs in those activities. (e.g., alternatives are not able to provide the technical function provided by MCCP or are more expensive) |  |
| Please describe the MWFs containing MCCP used by your company (i.e., type and characteristics of fluid used & concentration of MCCP) for each activity that requires their use.Also, please classify the MWFs according to the following descriptors:* Water-based MWF
* Oil-based MWF (with low concentration of MCCP)
* Oil-based MWF (with high concentration of MCCP)
* Neat oil MWF
 |  |
| Which metal(s) is/are processed by your company using MWFs containing MCCP?And are these MWFs required for certain metal characteristics, e.g., type, thickness etc. |  |
| What is the application of the metal products that are producing using MWFs containing MCCP; and are the products for industrial, professional or consumer use? Please provide some examples of the final products indicating the relevant sector. |  |
| What is the annual tonnage of MCCP for each sub-use? |  |

1. **Which sectors do you sell your finished metalworking product(s) to?**

|  |  |  |  |
| --- | --- | --- | --- |
| **Sector** | **What is the main MWF(s) containing MCCP used?** | **Annual average volume of finished metalworking products sold in the EEA?** **(tonnes per year)** | **Annual average volume of finished metalworking products sold outside EEA?** **(tonnes per year)** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

1. **Availability of alternatives – please describe the identity, availability and technical performance (including strengths & weaknesses) of potential alternatives to MWFs containing MCCP.**

|  |
| --- |
|  |

1. **Please can you describe the operating conditions and risk management measures in place (description and effectiveness) during the following activities:**

|  |  |
| --- | --- |
| **Metalworking operations when using MWFs containing MCCP** |  |
| **Cleaning of machine and ‘processed’ metal containing residues of MCCP-based fluids** |  |
| **Disposal of used MCCP-based metalworking fluids** |  |

ECHA are considering two possible restriction options (ROs):

* **RO1**: ban on placing on the market (and use) of MCCP[[2]](#footnote-3),
* **RO2**: ban on placing on the market (and use) of MCCP2 + possibly ‘justified derogations for specific application accompanied with risk management measures (RMMs)’
1. **How is your company likely to respond to RO1, assuming the restriction were to enter into force in 2024 ?** (please justify your response; e.g., switch to an alternative MWF without MCCP to continue to make metalworking products; change process so a MWF is not required; or cease production in the EEA and relocate outside the EEA)

|  |
| --- |
|  |

1. **Assuming the restriction were to enter into force in 2024 and considering your response to question 6, would you require a transition period (e.g., to switch to using alternatives)? – If so, justify the length of the transition period you would require and why.**

|  |
| --- |
|  |

1. **What are the socio-economic impacts associated with your most likely response to RO1?** (Please provide monetary/quantitative responses with supporting justification for your response)

|  |  |  |
| --- | --- | --- |
| **Types of cost** | **Impacts on your company without transition period (meaning full ban of the substance in 2024)** | **Impacts on your company with transition period (based on your answer to Q7)** |
| Any transition / substitution costs? (e.g. costs to use a MWF which does not contain MCCP) |  |  |
| Any impacts on profit and employment? (e.g., due to an increase in raw material costs, ceasing production, etc) |  |  |
| Any impacts on changes in your product prices, availability, and quality? |  |  |
| Any other impacts? |  |  |

1. **Assuming the restriction were to enter into force in 2024 and that a transition period would not be sufficient to switch to MWFs based on alternatives (for some or all processes currently relying on the use of MWFs based on MCCP at your company), would you require a derogation for a continued use of MWFs in certain processes? – If so, justify the need for the derogation (e.g., describe the processes in question) and indicate what (additional) risk management measures could be implemented to further minimise emissions and exposures of MCCP (RO2).**

|  |
| --- |
|  |

1. **What are the socio-economic impacts on your company under this restriction option (RO2)?**

|  |  |
| --- | --- |
| **Types of cost** | **Impacts on your company** Please provide monetary/quantitative responses with supporting justification for your response |
| Any transition / substitution costs? |  |
| Any costs to implement further risk management measures? |  |
| Any impacts on profit and employment? |  |
| Any impacts on changes in your product prices, availability, and quality? |  |
| Any other impacts? |  |

1. **Please indicate if you would be willing to participate in a short follow-up interview**

**YES/NO**

-------END OF QUESTIONNAIRE-------

1. We are not assessing use of MCCP in lubricants other than metalworking fluids. [↑](#footnote-ref-2)
2. It also covers the presence of MCCP in substances, mixtures and articles. [↑](#footnote-ref-3)