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Antimony Trioxide under increased threat?

FRETWORK was very kindly invited to be involved in the 2017 Antimony day on 29th November.

It is not easy to give a simple report on the day. My report is very much from a personal view of what is developing and I am happy to be corrected if I have not understood everything in precisely the right way.

The day started with the good news that the EU has included Antimony in its list of critical raw materials. (see <http://criticalrawmaterials.org>) – so far so good.

It was excellent to see the German BAuA present to update us on the CoRAP process for Antimony and that includes Antimony Trioxide (ATO). It was excellent to see ECHA represented and they reminded us that there is a duty to update a dossier with any new evidence.

Unfortunately there is new data from:

(<https://ntp.niehs.nih.gov/results/pubs/longterm/reports/longterm/tr500580/listedreports/tr590>)

Both ECHA and BAuA are agreed that industry must respond to provide data on this critical raw material (and including ATO) or face a new, more severe, assessment. Not much carrot and plenty of stick?

It is my view that the REACH process considers that Authorisation is something that can be done and is a proper process but the reality in practice is that a combination of NGO pressure and the attitude of retailers in particular will make the decisions. 'Avoid' or more precisely 'Do Not Use' and lets have some "Free from" will be the result and the effect on the strategic importance will be lost on

the way.

The original work on rats was many years old so what did NTP do to make this report more relevant? They conducted it on mice and I understand they are even more sensitive to particle inhalation testing.

There are issues concerning actual practice and dust and the question of particle size is crucial. The samples were micronised to make the mice tests to a degree that industry works damn hard to avoid in practice. In fact the marketing of ATO is continuing to shift towards non-dusting forms but that does not tick any boxes in the CLP/GHS process. The CLP/GHS classification system in place today does not allow for the distinctions between particle sizes for human health classifications (it does for environmental ones), as the REACH risk assessment system does. The physical form is not considered in specific terms in that case. It is not just Antimony that has issues with bad data on dust inhalation testing and the whole technique is being questioned – but not apparently by BAuA or ECHA. They must/will follow due process. I also have very serious reservations on exactly what is meant by “data”. Responsible companies are monitoring their workers but this type of data cannot be simply released. Industry has gone from (relatively speaking) ignoring the safety of workers 100 years ago to showing responsible care but the data as it is called on the health of workers is much more sensitive than that and these workers must be properly respected in the circumstances. So, what data is needed and how do we raise it? It is hoped that industry can come together to work on this but my feeling is that no one has any idea what is needed. Can we claim that non dusting forms are not relevant to the identified risk when the process apparently cannot engage with such differentiation? It is going to be difficult and it is hoped that all who are involved from an industrial perspective will join with i2a to try and resolve this problem

If there was one piece of information that emerged (no pun intended) from the day it was about the existence of the Antimony Bullet. You may find it here: https://en.m.wikipedia.org/wiki/Antimony_pill. An interesting take on toxicology.

It is my intention to have an i2a presentation at the next forum.

The Web Site.

Today we have published a new definition to provide some insight into the questions being raised about flame retardants, fires and increased toxicity. The

article, for it is not a short and simple answer, is based on a very interesting network approach with several contributions coming from outside the textile processing supply chain. The aspect of drawing from the knowledge and experience of other industrial sectors is important. Bringing those with expertise in other supply chains into the process is to be considered a notable success. We hope it proves interesting and useful. The item will appear as 2 forms, 1 the full version and 2 the shortened version or (perhaps) executive summary. Comment and the possibility to amend is welcome but do read the full version before you do that. We have done our best to make a fair and correct statement and the involvement of different contributors was very pleasing.

We also have the “How do flame retardants work?” item that was posted some weeks ago with a powerpoint of a match test. This is part of an ongoing project to develop media that the supply chain can use. More importantly we are trying to develop against identified criteria that was typified as “the Mumsnet market” in our group discussions. It’s not that we will look to post there but the style, approach and audience requirements are important. We are not simply looking to talk amongst ourselves on these issues but hope for instance it helps those in the supply chain who do not include a chemistry degree in their CV.

It is clear that we are continuously finding ideas being raised about flame retardants that do not withstand proper scientific scrutiny, in fact some are just nonsense. Responding to them in a way that is serious and scientifically grounded is important but we seem to have little media we can turn to to rebut the various statements that seem to be gaining credence simply by repetition without adding in any way to our understanding.

This is of course not a matter restricted to just flame retardants but we should be able to learn from such experience and look to find a new approach.

The FFR review situation.

There seems to be little chance that any Government department will launch itself into an initiative of any kind in the existing political impasse caused by a combination of a ‘Hung Parliament’ (i.e. with no clear majority) with a significant and decisive issue such as Brexit to deal with. However, the British Furniture Confederation (BFC) have made proposals that do seem to offer an opportunity and sitting down to discuss what could be achieved has highlighted the many relatively minor failings that were significantly put to one side on the basis of a running list of excuses from those responsible for these matters. The elliptical consequence is that avoiding action because “it may run

into problems with the EU” has now been put into a totally different context with the Brexit vote. FRETWORK is actively working on such a type of response and we believe we are not alone. It has been truly amazing how much was put to one side, overlooked or plain downright ignored when it has made so many problems for UK Industry and the Government department responsible could not understand the serious effect it had on the actual working and safety levels provided by the existing FFR. Some of the bright new ideas we were previously asked to consider were in complete conflict of the view that is developing and it is to be hoped that they will eventually be met with a suitably enlightened and informed response from Government.

We shall publish our response to the proposals from the BFC very shortly.

The next FRETWORK Forum

The launching of the web site and the uncertainty of the FFR Review through 2017 has not been conducive to setting out a proper basis for a Forum to be held. We remain firm in the view that we should only hold a meeting when there is a suitable set of topics to ensure a ‘good’ meeting.

Many people have asked when we will hold the next meeting so we should accept that they serve a greater purpose than a set of presentations. We have a list of suitable topics and a step in the FFR process could come soon so early next year would seem likely. The situation developing with ATO is important so an update on that and consideration of what we can do would be useful.

We continue to work towards running a Forum early in 2018.

And now the anecdotes.

I was very impressed when a friend who is a professor of chemistry told me of the case of a Russian dissident whose method of assassination was to be an injection of poison and the chosen poison was a dioxin. He recovered from the attack. Unfortunately the toxicity of dioxin is based on tests with rats and not real people. Rats do not cook over open fires where they would have been exposed to dioxins formed when wood burns. Man through cooking for millennia over open wood fires has apparently developed a certain tolerance of dioxins not apparent in rats. It does not stop dioxins being toxic but does affect the dose.....

It was recently announced that frying food at a high temperature and then adding water produces an aerosol that is injurious to health. The wok has to go!

adding water produces an aerosol that is injurious to health. The work has to go. This probably explains why the Chinese have not thrived over the millennia. The Indian use of the Tandoor, which is a good example of a clean burn and probably explains why North Indian food is good for you. The EU is in the process of bringing in strict requirements for temperature exposure of food to prevent the formation of acrylamide. No more brown toast or well cooked biscuits. Double cooked chips – no chance. The toxicity data on acrylamide was probably based on tests on rats and the interpretation made in a risk averse society.

STUART might say that this is science, technology and understanding put into disarray but I think the correct scientific definition is ABSOLUTELY BONKERS!

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