

11 May 2023

Association of Synthetic Amorphous Silica Producers (ASASP) – response to public consultation on Ecodesign for Sustainable Products Regulation (ESPR)

The Association of Synthetic Amorphous Silica Producers (ASASP) would like to give its views on the consultation to the ESPR initiative, in relation to product priorities for the first work program.

We believe that legislation addressing circularity should aim to strengthen the competitiveness of the European chemical industry. It should not duplicate or overlap with already existing environment safety legislation, as this would introduce legal uncertainty, make enforcement more complicated and most importantly, interfere with REACH.

Before further presenting our position, we would like to bring some clarity on the different forms of silica, as the JRC report are referring to several different types of silica.

Synthetic amorphous silica (SAS), covered by ASASP, is intentionally manufactured highly pure, crystalline-free, silicon dioxide (SiO₂). SAS is a well-studied material. It has been produced and used safely for almost a century without significant changes in its physicochemical properties and exists in four basic forms:

- pyrogenic (also called fumed) silica
- precipitated silica
- silica gel
- colloidal silica

Silica also occurs naturally in several forms, the most obvious being sand. It can also be found in other minerals and in many plants such as bamboo, rice and barley. In nature the most abundant form is quartz.

We would like to stress that silica sand and crystalline silica are completely different from synthetic amorphous silica (SAS), especially in terms of toxicity.

Regarding the ESPR proposal, ASASP would like to address two key points:

1) ESPR should focus on the sustainability of chemicals in end-products

We believe that the benefits of chemicals in terms of sustainability are best visible in the end-use products and applications. The properties and characteristics of chemicals can contribute to the sustainability of products in various ways, such as reducing energy consumption, extending the lifespan of products, and improving their recyclability. ASASP believes that prioritising chemicals as intermediates, is not the answer, especially in the case of substances such as SAS, which are embedded into a matrix and are not released into the environment.



Synthetic amorphous silica is used in several sectors such as the rubber market, in particular tyres, cosmetics & notably the toothpaste market, food, agricultural feed and pharmaceutical markets. Other industrial applications include paper, plastics, paint, coatings, adhesives and inks, as well as a wide variety of other industrial processes. SAS has a wide range of functions which contribute to expanding product life duration, limiting waste losses and primary raw material consumption, while decreasing the environmental and climate footprint of the manufacturing processes, due to its high efficacy.

Furthermore, the use of synthetic amorphous silica (SAS) contributes to the transition towards a sustainable and circular economy, given that SAS products are essential in a number of strategically important industries for the reduction of CO2 emissions and the achievement of a green and digital transition.

2) Chemicals as intermediate products should not be regulated under ESPR

The JRC's report lists synthetic amorphous silica (SAS) as one of the chemicals potentially in scope. We do not support the idea to regulate chemicals as intermediate substances that can pose a risk for human health or the environment, since they are already heavily regulated under REACH and CLP and specific product legislation (plant protection products, biocides, cosmetics, toys, food contact materials, etc).

Today, existing EU legislation already considers environmental impacts and sustainability considerations for substances and products, such as the Classification and Labelling (CLP) Regulation, REACH, the Industrial Emissions Directive (IED) and the EU Emission Trading System (ETS). In our opinion, the ESPR should build on existing regulatory and voluntary efforts, establish coherence and avoid overlaps, contradictions and duplication.

In conclusion, including chemicals such as synthetic amorphous silica into ESPR requirements would not give an additional benefit and might result in inconsistencies in legislative implementations and double legislation.

About ASASP

The Association of Synthetic Amorphous Silica Producers is a sector group of the European Chemical Industry Council (Cefic) and represents the major producers of synthetic amorphous silica (SAS) in Europe. ASASP is a non-profit organisation established in 1992 dedicated to promoting the safe use and benefits of SAS to society. The health and safety of employees, consumers and the wider community are of the utmost importance to ASASP members. ASASP continues to be convinced that based on the available information, the use of SAS in consumer products is considered safe.

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