

14 January 2013

Statement of the Silicon Carbide Manufacturers

SiC_{Ma}¹ welcomes that the draft report prepared by the Subcommittee on Classification of Carcinogenic Substances of the Dutch Expert Committee on Occupational Safety (DECOS) and published on 27th July 2011 concerning an evaluation of silicon carbide has been revised. The updated DECOS report is available under:

<http://www.gezondheidsraad.nl/sites/default/files/Siliciumcarbide201229.pdf>

The committee agrees with the SiC_{Ma} view that differentiation should be made between the silicon carbide materials and has incorporated the evaluation of the different modalities (fibrous and non-fibrous) in the final report. Based on these suggestions of SiC_{Ma} in the updated version of the report a clear distinction is made between SiC crude and grains on one side and SiC fibres on the other side. The recommendation of DECOS related to a category 1A carcinogenicity has been given up for crude and grains after SiC_{Ma} has provided scientific evidence that there is no risk for cancer using SiC crude and grains.

For crude and grains the committee concluded that although some of the experiments show that granular silicon carbide is toxicologically inert, none of the studies is of sufficient length in time to really disprove carcinogenicity. Therefore, the committee recommended a separate classification for non-fibrous silicon carbide category 3 according to the classification system of the Health Council of the Netherland² -what means that crude and grains is not classifiable as to its carcinogenicity to humans as the available data are insufficient. According to our information there will be no suggestion for SiC crude and grains as a substance of very high concern, despite the Committee is concerned about whether the commercial granular silicon carbide is sufficiently free of fibrous material. Therefore, the Committee advises to quantify the carcinogenic risk and to establish safe occupational exposure levels.

¹SiC_{Ma} was founded in 2000 with the objective to promote all initiative aimed at improving health, safety and environment preservation in the activities of production and processing of silicon carbide, and to frame, formulate and promote standards, normative rules and labels in the field of silicon carbide. For more information see <http://sicma-siliconcarbide.org/>.

²A classification as category 3 according to the Dutch system does not result in a classification according to Regulation (EC) No 1272/2008 (CLP Regulation)

Some more examinations/studies might be requested by DECOS in the future to reduce knowledge gaps which result in a current precautionary DECOS recommendation for SiC crude and grains as carc 3. SiC_{Ma} is convinced that all necessary investigations have been already done with the REACH registration dossier and can therefore not accept the suggested classification as carc 3.

The complete registration dossier, including the chemical safety report of non-fibrous Silicon carbide, specified in the dossier as “crude and grains, consisting of angular/globular particles; mass median diameter above 0.1 µm; content of whiskers below 0.1%”, has been submitted to ECHA before December 2010 and was accepted. According to all studies and evaluations included in the REACH registration dossier there is no scientific justification to classify silicon carbide crude and grains as “carcinogenic”. In conclusion, neither for neighbors of production sites nor for users of silicon carbide crude and grain products elevated cancer risks are expected.

However, SiC_{Ma} will follow up the discussions with DECOS and will support any reasonable scientific investigation that might be required.

SiC_{Ma} will keep you informed about the outcome of the ongoing consulting procedure with DECOS. If you have any questions in the meanwhile, please contact our consultant BiPRO (Dr. Reinhard Joas or Dipl.-Wirtsch.-Ing. Sonja Bauer, tel. ++49-(0)89-18979050).

Yours sincerely, on behalf of SiC_{Ma}

Drs. Ing. C.L. König
President of SiC_{Ma}