

## Borates – Supply chain mapping summary and further information

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The European Borates Association (EBA), representing the importers and manufacturers of borate substances, recently engaged Risk & Policy Analysts Ltd (RPA) to work with the borates supply chain to identify key information for substances of concern (these substances are identified in Table 1, overleaf – with links to additional useful information sources provided in Table 2).

One of the core objectives of this exercise was to build a more detailed data set on uses and users, by sector, for these substances. Efforts have also been made to identify the numbers of companies involved in the borates value chains as well as the size of companies and their geographic location.

The outputs of this exercise will be used by EBA to improve knowledge regarding the actors of the borates supply chain and be in a position to better communicate with them on borates-related issues. Also, the consolidated outcome of this exercise may be used to inform, where necessary, the authorities about all the beneficial uses of borates.

We are pleased to share with you the following high-level conclusions from this exercise:

- The use of borate substances remains widespread and important throughout the European Economic Area (EEA)<sup>1</sup> across a large number and wide range of applications. The continued use of borate substances also appears potentially critical and widespread within several sectors where overall use volumes may be considered comparatively low;
- Over 300 responses were received to the online survey from a multitude of actors at different levels in the supply chain, indicating that use of the substances is well known and important. In addition, use information from the consultation has been received for a multitude of sectors (including but not limited to abrasives, adhesives, agriculture, analytical reagents, catalysts, cellulose insulation, ceramics, chemical synthesis, coatings, construction, detergents, glass, industrial fluids, nuclear and photography) and uses have also been identified within all EEA member countries;
- Almost two thirds of survey responses (64%) were from micro, small and medium-sized enterprises. It is apparent that there is a significant presence of SMEs across several of the borates use sectors;
- It is apparent that the number of users and uses of boric acid and disodium tetraborates far exceeds the number of users and uses of diboron trioxide and disodium octaborate. This is perhaps unsurprising given the total REACH registration tonnage bands associated with each of the substances; and
- There appears to be a good level of knowledge within the supply chains concerning the regulatory situation regarding borate substances. A number of the industry associations contacted were able to highlight formal positions with regard to the nature of borate substance uses in their sector.

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1 The area of focus for this supply chain mapping exercise.

Table 1: Borates within the scope of the supply chain mapping exercise					
Substance	Registration tonnage band	No. Active registrants	EC No	CAS No	EEA Regulatory status
Boric acid	100,000 – 1,000,000 tonnes per annum	44	233-139-2	10043-35-3	Candidate List/6 <sup>th</sup> recommendation for inclusion in Annex XIV ( <b>deferred</b> )
Disodium tetraborate	100,000 – 1,000,000 tonnes per annum	19	215-540-4	1330-43-4; (anhydrous); 12179-04-3 (pentahydrate); 1303-96-4 (decahydrate)	Candidate List/6 <sup>th</sup> recommendation for inclusion in Annex XIV ( <b>deferred</b> )
Diboron trioxide	1,000 – 10,000 tonnes per annum	18	215-125-8	1303-86-2	Candidate List/6 <sup>th</sup> recommendation for inclusion in Annex XIV ( <b>deferred</b> )
Disodium octaborate	1,000 – 10,000 tonnes per annum	4	234-541-0 (anhydrous)	12008-41-2 (anhydrous) 12280-03-4 (tetrahydrate)	Annex XV (SVHC) dossier submitted 8 March 2018

Table 2: Useful information sources		
Information	Link	Notes
European Borates Association webpages	<a href="https://www.ima-europe.eu/about-ima-europe/associations/eba">https://www.ima-europe.eu/about-ima-europe/associations/eba</a>	Includes contact and membership details
Candidate List of Substances of Very High Concern for Authorisation	<a href="https://echa.europa.eu/candidate-list-table">https://echa.europa.eu/candidate-list-table</a>	Lists all substances on the Candidate List. Includes supporting documentation
ECHA recommendations for substances to be included in the REACH Authorisation List	<a href="https://echa.europa.eu/previous-recommendations">https://echa.europa.eu/previous-recommendations</a>	Details the formal recommendations that ECHA has made to the European Commission, and their status
ECHA draft recommendations for substances to be included in the REACH Authorisation List	<a href="https://echa.europa.eu/recommendation-for-inclusion-in-the-authorisation-list">https://echa.europa.eu/recommendation-for-inclusion-in-the-authorisation-list</a>	Details ECHA's draft recommendations and sets out information on how to participate in the public consultation on each of ECHA's draft recommendations
The Public Activities Coordination Tool	<a href="https://echa.europa.eu/pact">https://echa.europa.eu/pact</a>	Lists the substances for which a RMOA is either under development or has been completed
ECHA Questions and Answers on REACH	<a href="https://echa.europa.eu/support/qas-support/browse">https://echa.europa.eu/support/qas-support/browse</a>	Contains information on all aspects of REACH, from general questions to CoRAP, Substance Evaluation, Authorisation and Restriction