

European Salt Producers' Association  
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Belgium

Brussels, 23.08.2013

Mrs K. Dari  
CEN TC164  
AFNOR

**Subject:** Draft standard “*Chemicals used for treatment of swimming pool water — Sodium chloride used for electro chlorinator systems*”, CEN TC164 – Position EuSalt

Dear Mrs Dari,

As EuSalt we write you this letter in view of providing you the position of the European Salt producers Association, an association having a liaison organisation status within CEN TC164.

Although the set deadline to react on the draft standard, has been passed, due to the consultation process within EuSalt as well as the holiday timing leading to absence of many of the experts, we have not been able to provide consensus prior to the set deadline.

Therefore, please do accept our apologize, but we would like to transmit you the position we have established as EuSalt in relation with the CEN (Comité Européen De Normalisation) working group CEN/TC 164/WG 9 draft version for the standardization of „*Chemicals used for treatment of swimming pool water — Sodium chloride used for electro chlorinator systems*“. This draft version was published by CEN on June 7<sup>th</sup> 2013 as prEN 16401 and was sent to the formal vote.

The position of EuSalt is to refuse the standard and vote against it due to the following reasons:

- 1.) There is already an existing standard (EN 14805) dealing with the on-site electro chlorination

of water by creating chlorine in-situ from sodium chloride. These standards have higher minimum purity criteria like e.g. the maximum value for Arsenic or Lead than the presented one. The proposed new standard should have at least the same minimum quality as already published in EN 14805. Different qualities dealing with the same topic could create confusions on the market.

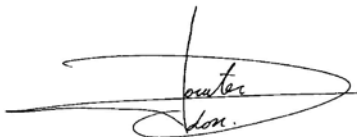
- 2.) The proposed prEN 16401 has banned the use of anti-caking agents like sodium Ferro cyanide (E535). This is from our point of view an absolutely wrong decision. At point 3.2 of the draft version it is written that the product can be *"supplied as free-flowing crystals"*. A salt prepared without anti-caking can't be stored for a longer time. It would cake and the handling of the salt will be impeded. The product wouldn't be free flowing anymore. In the previously mentioned EN 14805 anti-caking agents are allowed with a maximum level of 15 mg Ferro cyanide /kg salt.
- 3.) It is necessary to reconsider this draft and apply exactly the same parameters than the EN 973, with the exceptions for use in the process with membrane cells.

There is no technical justification that anti-caking agents should be banned. They don't influence the effectiveness or the durability of the equipment. Only if membrane techniques are used for the in-situ production of chlorine E535 can be harmful to the membranes. In that case the shortly published EN 16370 will apply.

Could we ask you, although the position has been introduced beyond the reasonable set deadline, to transmit this position for consideration in the process of setting the standard?

We would be grateful if you could consider our position and reflect upon the position as set.

Yours sincerely,



**Wouter Lox**

Managing Director