Annex to news

Helsinki, 20 September 2022

Cancer-causing PAHs in clay targets need an EU-wide ban

REACH restrictions

Substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for sport shooting

RAC adopted and SEAC agreed on their opinions on this restriction proposal by ECHA, submitted in October 2021, which would restrict the placing on the market of clay targets for shooting when they contain more than 0.005 % by weight of the sum of the concentrations of 18 indicator polycyclic aromatic hydrocarbons (PAHs). The consultation on the draft SEAC opinion was launched on 14 September 2022 for 60 days. SEAC's opinion is expected to be adopted in December 2022.

2,4-dinitrotoluene

SEAC adopted its opinion on ECHA's proposal to restrict 2,4-dinitrotoluene (2,4-DNT) in products (articles). The proposal would effectively ban the supply and use of the substance in products imported into the EU market. 2,4-DNT may cause cancer and has been on the REACH Authorisation List since 2011.

Lead in outdoor shooting and fishing

The proposal is complementary to the existing restriction on the use of lead gunshot in wetlands. The consultation on the draft SEAC opinion finished on 29 August 2022 with over 150 comments received. Due to the extended opinion timelines, SEAC is expected to adopt its opinion in December 2022.

More:

- RAC backs restricting lead in outdoor shooting and fishing, 31 May 2022
- Lead in outdoor shooting and fishing: SEAC agrees draft opinion, 3 June 2022

RAC adopts nine opinions on harmonised classification and labelling

Perboric acid, sodium salt [1]; perboric acid, sodium salt, monohydrate [2]; perboric acid (HBO(O2)), sodium salt, monohydrate; sodium peroxoborate [3]; sodium perborate [4] (EC 234-390-0 [1], 234-390-0 [2], 239-172-9 [4]; CAS 11138-47-9 [1]; 12040-72-1 [2]; 10332-33-9 [3]; 15120-21-5 [4])

Sodium per(oxo)borate and its hydrates are used as oxidising and bleaching agents mainly in detergents (household detergents as well as detergents for institutional uses) and in cleaning products (stain removers in the form of bleach booster tablets and dishwashing tablets).

Per(oxo)borates are used in both regular and compact heavy-duty laundry powders.
The substances are currently distributed among different entries in Annex VI to the CLP Regulation, with the following classifications:

Substances [1], [2], [3], [4] (above), containing < 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm – oxidiser (Ox. Sol. 3; H272), may damage fertility and

the unborn child (Repr. 1B; H360Df), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318) Substances [1], [2], [3], [4] (above), containing = 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm – oxidiser (Ox. Sol. 3; H272), may damage fertility and the unborn child (Repr. 1B; H360Df), toxic if inhaled (Acute Tox. 3*; H331), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

Substances [1], [2], [4] (above), containing < 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm – oxidiser (Ox. Sol. 3; H272), may damage fertility and the unborn child (Repr. 1B; H360Df), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

Substances [1], [2], [4] (above), containing ≥ 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm – oxidiser (Ox. Sol. 3; H272), may damage fertility and the unborn child (Repr. 1B; H360Df), toxic if inhaled (Acute Tox. 3*; H331), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

RAC agreed to the proposal by Sweden to merge substances [1], [2], [3] and [4] (above) into a single entry and to add an acute toxicity estimate (ATE) of 0.75 mg/L (dusts or mists) for the acute inhalation toxicity classification (Acute Tox. 3; H331), an ATE of 890 mg/kg bw/day for the acute oral toxicity classification (Acute Tox. 4; H302) and to modify the reproductive toxicity classification (Repr. 1B; H360FD) and to remove the existing specific concentration limit from the reproductive toxicity classification. RAC agreed to the proposal to include a specific note to apply additivity for boron compounds that exert their reproductive toxicity through the same toxic entity (boric acid/borate ion). The final wording of this note will be adopted by the Commission.

Perboric acid (H3BO2(O2)), monosodium salt trihydrate [1]; perboric acid, sodium salt, tetrahydrate [2]; perboric acid (HBO(O2)), sodium salt, tetrahydrate; sodium peroxoborate, hexahydrate [3] (EC 239-172-9 [1], 234-390-0 [2]; CAS 13517-20-9 [1]; 37244-98-7 [2], 10486-00-7 [3])

Sodium per(oxo)borate and its hydrates are used as oxidising and bleaching agents mainly in detergents (household detergents as well as detergents for institutional uses) and in cleaning products (stain removers in the form of bleach booster tablets and dishwashing tablets).

Per(oxo)borates are used in both regular and compact heavy-duty laundry powders.

The substances are currently distributed among different entries in Annex VI to the CLP Regulation, with the following classifications:

Substances [1], [2], [3] (above), containing < 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm – may damage fertility and the unborn child (Repr. 1B; H360Df), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

Substances [1], [2], [3] (above), containing ≥ 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm - may damage fertility and the unborn child (Repr. 1B; H360Df), harmful if inhaled (Acute Tox. 4*; H332), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

RAC agreed to the proposal by Sweden to merge substances [1], [2] and [3] (above) into a single entry and to add an ATE of 1.2 mg/L (dusts or mists) for the acute inhalation toxicity

classification (Acute Tox. 4; H332) and to modify the reproductive toxicity classification (Repr. 1B; H360FD) and to remove the existing specific concentration limit from the reproductive toxicity classification. RAC agreed to the proposal to include a specific note to apply additivity for boron compounds that exert their reproductive toxicity through the same toxic entity (boric acid/borate ion). The final wording of this note will be adopted by the Commission.

Sodium peroxometaborate (EC 231-556-4, CAS 7632-04-4)

Sodium per(oxo)borate and their hydrates are used as oxidising and bleaching agents mainly in detergents (household detergents as well as detergents for institutional uses) and in cleaning products (stain removers in the form of bleach booster tablets and dishwashing tablets). Per(oxo)borates are used in both regular and compact heavy-duty laundry powders.

Sodium peroxometaborate, as well as sodium perborate and sodium peroxoborate containing < 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm, are currently classified as oxidiser (Ox. Sol. 2; H272), may damage fertility and the unborn child (Repr. 1B; H360Df), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318). Sodium peroxometaborate, as well as sodium perborate and sodium peroxoborate containing ≥ 0.1 % (w/w) of particles with an aerodynamic diameter of below 50 µm, are classified as oxidiser (Ox. Sol. 2; H272), may damage fertility and the unborn child (Repr. 1B; H360Df), toxic if inhaled (Acute Tox. 3*; H331), harmful if swallowed (Acute Tox. 4*; H302), may cause respiratory irritation (STOT SE 3; H335) and causes serious eye damage (Eye Dam. 1; H318).

RAC agreed to the proposal by Sweden to merge the entry into one and to add an ATE of 730 mg/kg bw for the acute oral toxicity classification (Acute Tox. 4; H302), an ATE of 0.62 mg/L (dusts or mists) for the acute inhalation toxicity classification (Acute Tox. 3; H331) and to modify the reproductive toxicity classification (Repr. 1B; H360FD) and to remove the existing specific concentration limit from the reproductive toxicity classification. RAC agreed to the proposal to include a specific note to apply additivity for boron compounds that exert their reproductive toxicity through the same toxic entity (boric acid/borate ion). The final wording of this note will be adopted by the Commission.

Trimethyl borate (EC 204-468-9, CAS 121-43-7)

Trimethyl borate is used in the following products: welding and soldering products, laboratory chemicals, in building and construction, and in scientific research and development. This substance is also used by professional workers in the production of metal products, formulation of mixtures (welding and soldering products) and as intermediate in the manufacturing of chemicals at industrial sites. Trimethyl borate has a current Annex VI entry as a flammable liquid (Flam. Liq. 3; H226) and harmful in contact with skin (Acute Tox. 4*; H312).

RAC agreed to the proposal by the Netherlands to add to the current classification that the substance may damage fertility and the unborn child (Repr. 1B; H360FD). RAC agreed to the proposal to include a specific note to apply additivity for boron compounds that exert their reproductive toxicity through the same toxic entity (boric acid/borate ion). The final wording of this note will be adopted by the Commission.

1*H*-benzotriazole (EC 202-394-1, CAS 95-14-7)

1*H*-benzotriazole is used in lubricants, greases and release products, washing and cleaning products, heat transfer fluids, anti-freeze and de-icing products, etc. The substance has no current Annex VI entry.

RAC agreed to the proposal by Germany to classify 1*H*-benzotriazole as a substance which is

toxic to aquatic life with long lasting effects (Aquatic Chronic 2; H411).

Methyl-1*H*-benzotriazole (EC 249-596-6, CAS 29385-43-1)

Methyl-1*H*-benzotriazole is used in lubricants, greases and release products, washing and cleaning products, heat transfer fluids, anti-freeze and de-icing products, etc. The substance has no current Annex VI entry.

RAC agreed to the proposal by Germany to classify methyl-1*H*-benzotriazole as a substance which is toxic to aquatic life with long lasting effects (Aquatic Chronic 2; H411).

Sodium 3-(allyloxy)-2-hydroxypropanesulphonate (EC 258-004-5, CAS 52556-42-0)

Sodium 3-(allyloxy)-2-hydroxypropanesulphonate is used in formulation or re-packing, at industrial sites and in manufacturing, as well as in the following product or use categorisations: "manufacturing, chemical", "consumer use", "manufacturing, plastics", "manufacturing, raw material", "paint", surface treatment". Industrial uses consist of corrosion inhibitors and anti-scaling agents, intermediates and solid separation agents. Consumer uses consist of adhesives and sealants, paints and coatings, resin products and water treatment products. The substance has no current Annex VI entry.

RAC agreed to the proposal by France to classify sodium 3-(allyloxy)-2-hydroxypropanesulphonate as a substance causing serious eye damage (Eye Dam. 1; H318) and which may damage fertility (Repr. 1B; H360F).

***N,N'*-methylenediacrylamide** (EC 203-750-9, CAS 110-26-9)

N,N'-methylenediacrylamide (MBA) is used as a crosslinking agent and as a monomer in polymerisation. It is used by professional workers to produce electrophoresis gels. It has no current Annex VI entry.

RAC agreed to the proposal by Sweden to classify MBA as a substance that may cause genetic defects (Muta. 1B; H340).

Ethanethiol; ethyl mercaptan (EC 200-837-3, CAS 75-08-1)

Ethanethiol may be used as an odorant for natural gas, as well as an intermediate and starting material in the manufacture of plastics, insecticides and antioxidants. The substance has the following classifications in the current Annex VI entry: Flam. Liq. 2; H225, Acute Tox. 4*; H332, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410.

RAC agreed to the proposal by Austria to classify ethanethiol as an extremely flammable liquid and vapour (Flam. Liq. 1; H224), and as a substance which is toxic if inhaled (Acute Tox. 3; H331) with an ATE of 7.1 mg/L (vapours) and harmful if swallowed (Acute Tox. 4; H302) with an ATE of 680 mg/kg bw.

Applications for authorisation

RAC and SEAC agreed on 11 draft opinions and adopted two opinions on applications for authorisation. The adopted opinions concern:

- The use of chromium trioxide for decorative/functional application in the furniture, sanitary and automotive sectors; and
- The use of chromium trioxide for electroplating of metal substrates with the purpose of creating a long-lasting high durability surface with bright look.

The agreed draft opinions concern uses of chromium trioxide in chrome plating for heavy duty applications, such as:
- plating of aircraft safety critical steel ball screws used in airplane's actuators;
- anodising of aluminium spars as critical surface preparation phase for bonding with aircraft safety critical propeller blades;
- plating of machine components for centrifugal separator and decanter centrifuges;
- inside hard chromium coating of firearms barrel bores;
- hard chromium coating of complex outer surfaces of firearm auxiliary parts;
- hard chromium coating of complex outer and inner surfaces of firearms auxiliary parts;
- plating of dental instruments applied by professionals for dental treatment;
- plating of large and small components with complex geometries and/or requiring special approval procedures for their application in demanding sectors such as medical, aerospace, defence, and mining industry;
- plating of small components with simple geometries not requiring special approval procedures for their application in demanding sectors such as hydraulic systems, food, paper and chemical industry.

Other agreed draft opinions concern the industrial uses of chromium trioxide for:
- electroplating of different types of substrates with the purpose to create a long-lasting, high durability surface with bright (shiny) or matte look; as well as
- the etching of polypropylene (PP) substrates, as a pre-treatment step of the electroplating process, for the luxury sector and other applications.

The opinions will be available on ECHA's website in the near future:
Committee for Risk Assessment | Committee for Socio-economic Analysis

Background information

Role of RAC in EU regulatory processes

The committee is responsible for preparing scientific opinions related to the risks of chemicals to human health and the environment for the following processes:
- applications for authorisation;
- proposals for restrictions;
- proposals for harmonised classification and labelling; and
- occupational exposure limits (OELs).

RAC also prepares opinions on specific questions relating to risks of chemicals to human health or the environment and on any other aspects concerning the safety of substances at the Executive Director's request. The final decisions are taken by the European Commission through a comitology procedure.

Role of SEAC in EU regulatory processes

The committee is responsible for preparing the opinion of the Agency on applications for authorisation and proposals for restrictions. SEAC also prepares opinions on specific questions relating to socio-economic issues and on any other aspects concerning the safety of substances on their own, in preparations or in articles at the Executive Director's request. The final decision for proposals for restrictions as well as on applications for authorisation will be taken by the European Commission through a committee procedure.