

RAC WG/CLH/R/2/2021

6 July 2021

**Report
of the 2nd Meeting of the Committee for Risk Assessment
Working Group on Harmonised Classification and Labelling
(RAC-58 CLH WG)**

**ECHA Conference Centre (Telakkakatu 6, Helsinki)
via Webex**

**Monday 5 July 2021 at 09.30
to
Tuesday 6 July at 19.00**

Summary Record of the Proceedings

1. Welcome and apologies

The Chair, Tim Bowmer, welcomed the participants to the 2nd meeting of the RAC Working Group on CLH and reminded that RAC had agreed on the establishment of the group at RAC-56 in March 2021. Five RAC-58 cases were chosen for this WG and the RAC consultations had been organised on these prior to the WG meeting. The Working Group also discussed four cases carried over from RAC-57. The Chair noted that it was the intention to have all CLH dossiers scrutinised by the working group in the future. On this occasion, a partial agenda had been prepared to allow rapporteurs more time to adapt to the new timelines. He informed that a full agenda of all scheduled dossiers would be tabled for the 3rd working group meeting in October 2021 ahead of RAC-59.

2. Adoption of the Agenda

The Chair reviewed the agenda for the meeting (RAC WG/CLH/2/2021), which was adopted with no modification and is attached to this Report as Annex I.

3. Declarations of conflicts of interests to the Agenda

The Chair requested all participants to declare any potential conflicts of interest to any of the agenda items. Several participants of the meeting declared a potential conflict of interest on cases scheduled for the discussion as presented in Annex III to this Report. The Chair declared no potential interests related to any of the agenda points for the meeting.

4. Harmonised classification and labelling (CLH)

4.1 Hazard classes to be proposed by the group for agreement (without plenary debate) by A-listing at RAC-58

The Working Group agreed to propose the following hazard classes to RAC-58 for fast-track (without discussing them in the WG):

- **Clothianidin (ISO):** acute oral toxicity
- **Resorcinol:** acute toxicity via all routes, STOT SE

4.2 Hazard classes for discussion

4.2.1 Clothianidin (ISO); (E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine (EC 433-460-1; CAS 210880-92-5)

The Chair welcomed the expert accompanying the CropLife Regular Stakeholder Observer and informed that **clothianidin (ISO)** is an active substance in the meaning of Directive 98/8/EC (repealed by Regulation (EU) No. 528/2012) and in the meaning of Regulation (EC) No. 1107/2009 (replaces Directive 91/414/EEC). The substance has current Annex VI entry as Acute Tox. 4 *; H302, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410 (M=10).

The DS (DE) proposes to modify the classification to Acute Tox. 4; H302 (ATE=389 mg/kg be), Aquatic Acute 1; H400 (M=10), Aquatic Chronic 1; H410 (M=100) and to add Repr. 2; H361fd and STOT SE 1; H370 (nervous system).

Acute oral toxicity, reproductive toxicity, STOT SE and hazardous to the aquatic environment were the hazard classes open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 21 January 2022.

The WG agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.

[Acute Tox. 4; H302 (ATE=390 mg/kg bw, Repr. 2; H361f, STOT SE 1; H370 (nervous system), Aquatic Acute 1; H400 (M=10), Aquatic Chronic 1; H410 (M=100)]

All above-mentioned hazard classes are proposed to be agreed by A-listing, except for reproductive toxicity.

Rapporteurs to revise the opinion in accordance with the discussion in the WG and to provide it to SECR.

SECR to table the updated opinion for final discussion and adoption at RAC-58.

The expert accompanying the CropLife Regular Stakeholder Observer commented on reproductive toxicity.

4.2.2 Dimethyl propylphosphonate (EC 242-555-3; CAS 18755-43-6)

The Chair welcomed the Dossier Submitter representative and informed that **dimethyl propylphosphonate** is used in rigid foam, foam granules, rebounded PUR and CASE (coatings, adhesives, sealants and elastomers) applications by industrial and professional workers. It is also incorporated into articles which may be used by consumers. The substance has no current Annex VI entry.

The DS (IA) proposes to classify the substance as Muta. 1B; H340 and Repr. 1B; H360FD.

Germ cell mutagenicity and reproductive toxicity were the hazard classes open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 5 February 2022.

The group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.

[Muta. 1B; H340, Repr. 1B; H360Df]

Rapporteur to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.

SECR to table the updated opinion for final discussion and adoption at RAC-58.

4.2.3 Hydrogen sulphide, hydrogen sulfide (EC 231-977-3; CAS 7783-06-4)

The Chair welcomed the Concawe Occasional Stakeholder Observer and informed that **hydrogen sulfide** is used by consumers, by professional workers (widespread uses), in formulation or re-packing, at industrial sites and in manufacturing. According to the registration data the application fields for hydrogen sulfide are agriculture, forestry and fishing. Further uses are the manufacture of chemicals, pulp, paper and paper products, food products, textile, leather, wood and wood products. The substance has current Annex VI entry as Press. Gas, Flam. Gas 1; H220, Acute Tox. 2*; H330 and Aquatic Acute 1; H400.

The DS (DE) proposes to modify Acute Tox. 2; H330 (ATE=100 ppmV (gases)); Flam. Gas 1A; H220 and to maintain Press. Gas, Note U (and remove GHS04).

Flammable gases, gases under pressure and acute inhalation toxicity were the hazard classes open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 1 April 2022.

The Working Group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.

[Flam. Gas 1A; H220, Press. Gas, Note U, Acute Tox. 2; H330 (ATE=440 ppmV (gases))]

Rapporteur to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.

SECR to table the updated opinion for adoption at RAC-58.

<p>The Working Group agreed to remove GHS04.</p> <p>All above-mentioned hazard classes are proposed to be agreed by A-listing.</p>	
<p>4.2.4 Resorcinol; 1,3-benzenediol (EC 203-585-2; CAS 108-46-3)</p>	
<p>The Chair welcomed the Dossier Submitter representative and the expert accompanying the Cefic Regular Stakeholder Observer and informed that resorcinol is used by consumers, by professional workers (widespread uses), in formulation or re-packing and at industrial sites. Resorcinol has various uses; for example in the manufacture of rubber products and in wood adhesives, flame retardants, UV stabilizers, and dyes. It is also used in personal care products such as hair colorants, anti-acne preparations, and peels. The substance has current Annex VI entry as Acute Tox. 4*; H302, Skin Irrit. 2; H315, Eye Irrit. 2; H319 and Aquatic Acute 1; H400.</p> <p>The DS (FI) proposes <u>to add</u> Skin Sens. 1A; H317 and STOT SE 1; H370 (nervous system), <u>to modify</u> Acute Tox. 4; H302 (ATE=500 mg/kg bw), <u>to retain</u> Aquatic Acute 1; H400 and <u>to add</u> M=1.</p> <p>Acute toxicity via all routes, skin sensitisation, STOT SE and hazardous to the aquatic environment were the hazard classes open for the comments during the Consultation.</p> <p>Legal deadline for the adoption of an opinion is 8 May 2022.</p>	
<p>The Working Group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.</p> <p>[Acute Tox. 4; H302 (ATE=500 mg/kg bw), Skin Sens. 1B; H317, STOT SE 1; H370 (nervous system), Aquatic Acute 1; H400 (M=1)]</p> <p>All above-mentioned hazard classes are proposed to be agreed by A-listing.</p>	<p>Rapporteurs to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.</p> <p>SECR to table the updated opinion for adoption at RAC-58.</p>
<p>The expert accompanying the Cefic Regular Stakeholder Observer commented on skin sensitisation.</p>	
<p>4.2.5 Silver (EC 231-131-3; CAS 7440-22-4)</p>	
<p>The Chair welcomed the Dossier Submitter representatives, the experts accompanying the CEFIC and the Eurometaux Regular Stakeholder Observers as well as the EPMF Occasional Stakeholder Observer with an accompanying expert. He informed that silver is used in biocidal products. It is used in products categorised into the following product types:</p>	

disinfectants and algaecides not intended for direct application to humans or animals, food and feed area disinfection, drinking water disinfection, preservatives for liquid-cooling and processing systems. Some of these uses may result in a vast range of consumer applications. Apart from biocidal use, silver is widely used by industry, professionals and consumers. Silver has no current Annex VI entry.

The DS (SE) proposes to classify silver as Skin Sens. 1; H317, Muta. 2; H341, Repr. 1B; H360FD, Aquatic Acute 1; H400 (M=10) and Aquatic Chronic 1; H410 (M=10). The DS proposes to classify nanosilver as Skin Sens. 1; H317, Muta. 2; H341, Repr. 1B; H360FD, Aquatic Acute 1; H400 (M=1000) and Aquatic Chronic 1; H410 (M=100).

Selected physical hazards (explosives, flammable solids, self-reactive substances, pyrophoric solids, self-heating substances, substances which in contact with water emit flammable gases, oxidising solids, corrosive to metals), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, respiratory sensitisation, skin sensitisation, germ cell mutagenicity, carcinogenicity, reproductive toxicity, STOT SE, STOT RE, hazardous to the aquatic environment were the hazard classes open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 16 March 2022.

The Rapporteurs presented and the Working Group took note of the key issues related to this dossier.

The Working Group requested the Rapporteurs to standardise the terminology used for the different forms of silver.

Human health

The group noted that the available animal studies were mainly carried out on silver salts and none with massive silver.

The group acknowledged that it will be important to decide how to include the toxicokinetics of silver in the assessment of the human health hazard classes.

The group noted that a toxicokinetic study comparing four forms of silver/silver compounds and an extended one generation reproduction toxicity study with silver acetate are currently being carried out. The results of these studies, if made available, e.g. at a minimum as GLP audited drafts and in a timely manner, will be fitted into a revised opinion making schedule.

A clear explanation of what is being classified is required for silver. The Rapporteur considers that classification based on the Ag+ species alone would be overly complex and untenable. Therefore the opinion should focus on the classification of silver metal, this would imply hazard and classification of

Rapporteurs to prepare the first draft opinion in accordance with the discussion in the Working Group and to provide it to SECR.

SECR to table the draft opinion for further discussion at the next CLH Working Group meeting (October 2021).

the metallic forms, i.e. AgNPs, silver powder and silver massive.

The use of other compounds and complexes of silver for read-across are assessed on an individual basis. It is recognised that consideration of Ag⁺ released from very soluble sources may represent an unrealistic scenario regarding the hazard potential of silver metal.

It is important to distinguish between the hazard assessment of silver compounds/salts and the hazard assessment of silver metal. Classification of silver compounds/salts is not under the scope of this CLH proposal, only the classification of silver metal is.

Hazard characterisation through an understanding of TK data can provide key data on bioavailability. This can be used on a case by case basis to determine the suitability of a particular study investigating a particular health hazard.

Bioavailability of the Ag[0] species and Ag⁺ cation should take precedence over the solubility characteristics of a particular silver substance where possible.

Environment

The role of produced particles should be considered in line with the flow diagram developed by RAC for lead.

Further consideration should be given to the use of the information on species sensitivity distribution for both acute and chronic aquatic data.

The Rapporteur to provide comprehensive information on the behaviour and ecotoxicity of silver nanoparticles in the draft opinion.

The Eurometaux Regular Stakeholder Observer, the experts accompanying the Cefic and the Eurometaux Regular Stakeholder Observers, the EPMF Occasional Stakeholder Observer and the expert accompanying the EPMF Occasional Stakeholder Observer commented on several aspects of the presentations.

4.2.6 Nonylphenol, branched and linear, ethoxylated (with average molecular weight < 352 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: 500-315-8; 500-024-6; 500-045-0; 500-209-1; 248-762-5; 243-816-4; 248-291-5; and others; CAS: 127087-87-0; 9016-45-9; 26027-38-3; 68412-54-4; 27986-36-3; 20427-84-3; 27176-93-8; 1119449-38-5 and others)

The Chair welcomed the Dossier Submitter representative and explained that **nonylphenol ethoxylates (NPEs)** fall under the Prior Informed Consent Regulation (PIC, EC/649/2012). The substance has no current Annex VI entry.

The DS (NL) proposes to classify nonylphenol, branched and linear, ethoxylated (with 352 g/mol ≤ average molecular weight < 704 g/mol)) as Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410 (M=10).

Hazardous to the aquatic environment was the only hazard class open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 26 December 2021.

The Working Group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.

[Aquatic Acute 1; H400 (M=1), Aquatic Chronic 1; H410 (M=10)]

Rapporteur to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.

SECR to table the updated opinion for final discussion and adoption at RAC-58.

4.2.7 Nonylphenol, branched and linear, ethoxylated (with 352 g/mol ≤ average molecular weight < 704 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: 230-770-5; 248-743-1; 247-555-7; 248-293-6 and others; CAS: 127087-87-0; 9016-45-9; 7311-27-5; 27942-27-4; 26264-02-8; 27177-05-5; 14409-72-4 and others)

The Chair welcomed the Dossier Submitter representative and explained that **nonylphenol ethoxylates (NPEs)** fall under the Prior Informed Consent Regulation (PIC, EC/649/2012). The substance has no current Annex VI entry.

The DS (NL) proposes to classify nonylphenol, branched and linear, ethoxylated (with 704 g/mol ≤ average molecular weight ≤ 1540 g/mol) as Aquatic Chronic 2; H411.

Hazardous to the aquatic environment was the only hazard class open for comments during the Consultation.

Legal deadline for the adoption of an opinion is 26 December 2021.

The Working Group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.

[Aquatic Acute 1; H400 (M=1), Aquatic Chronic 1;

Rapporteur to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.

SECR to table the updated opinion for

H410 (M=10)]	final discussion and adoption at RAC-58.
4.2.8 Nonylphenol, branched and linear, ethoxylated (with 704 g/mol ≤ average molecular weight ≤ 1540 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: -; CAS: 127087-87-0; 9016-45-9 and others)	
<p>The Chair welcomed the Dossier Submitter representative and explained that nonylphenol ethoxylates (NPEs) fall under the Prior Informed Consent Regulation (PIC, EC/649/2012). The substance has no current Annex VI entry.</p> <p>The DS (NL) proposes no environmental classification for nonylphenol, branched and linear, ethoxylated (with 704 g/mol ≤ average molecular weight ≤ 1540 g/mol). Hazardous to the aquatic environment was the only hazard class open for comments during the Consultation.</p> <p>Legal deadline for the adoption of an opinion is 26 December 2021.</p>	
<p>The Working Group agreed to recommend to RAC-58 to adopt the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.</p> <p>[Aquatic Acute 1; H400 (M=1), Aquatic Chronic 1; H410 (M=10)]</p>	<p>Rapporteur to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.</p> <p>SECR to table the updated opinion for final discussion and adoption at RAC-58.</p>
4.2.9 [1] Lithium carbonate; [2] lithium chloride; [3] lithium hydroxide (EC: [1] 209-062-5; [2] 231-212-3; [3] 215-183-4; CAS: [1] 554-13-2; [2] 7447-41-8; [3] 1310-65-)	
<p>The Chair welcomed the Dossier Submitter representative and the experts accompanying the Ceifc and the Eurometaux Regular Stakeholder Observers and reminded that this dossier was already discussed at RAC-57, but the discussion was not finalised due to time constraints. The Chair informed that lithium carbonate is the starting material for the production of lithium salts. It is used in the manufacture of aluminium and as a flux in the glass, enamel and ceramic industries, and in the construction industry. Further, it is applied in the prophylaxis and treatment of affective disorders. Lithium chloride is used to absorb moisture in air conditioning systems and in batteries and in welding and brazing fluxes in the production of lightweight alloys. Lithium hydroxide (monohydrate) is used in alkaline storage batteries and for manufacturing of lithium soaps. Lithium hydroxide (anhydrous) is used as an additive to potassium hydroxide in big industrial batteries and in the production of lithium stearate. Lithium is also used as a pharmaceutical in psychiatric medication. The substances have no current Annex VI entry.</p> <p>The DS (FR) proposes to classify the substances as Repr. 1A; H360FD.</p> <p>Germ cell mutagenicity, carcinogenicity and reproductive toxicity were the hazard classes open for comments during the Consultation.</p> <p>Legal deadline for the adoption of an opinion is 22 December 2021.</p> <p>At RAC-57, RAC agreed to classify the substances as Repr. 1B; H360F and to discuss further developmental toxicity and lactation at the July Working Group meeting.</p>	

<p>The Working Group discussed read across, developmental toxicity and lactation. The Members supported category 1A for development and classification for Lactation. RAC will discuss further read across, developmental toxicity and lactation at RAC-58.</p> <p>The Working Group requested a small group of Members, together with the Rapporteurs, to further consider how the local effects of high pH hydroxide solutions might impact the classification of lithium hydroxide when using read across.</p>	<p>Rapporteurs to revise the opinion in accordance with the discussion in the Working Group and to provide it to SECR.</p> <p>SECR to organise an <i>ad-hoc</i> consultation on the new Ahmed 2021 study.</p> <p>SECR to table the updated opinion for final discussion and adoption at RAC-58.</p>
<p>The experts accompanying the Cefic and the Eurometaux Regular Stakeholder Observers commented on read across. The Eurometaux Regular Stakeholder Observer and the experts accompanying the Cefic and the Eurometaux Regular Stakeholder Observers commented on reproductive toxicity. The experts accompanying the Cefic and the Eurometaux Regular Stakeholder Observers commented on lactation.</p>	

5. Adoption of the report from the Working Group

Before the Chair thanked the participants and closed the meeting, the Working Group adopted its report of the 2nd Meeting, requesting the Secretariat to make any necessary editorial changes. The Secretariat informed that as the ECHA website will be frozen in July for maintenance, the Working Group minutes will most likely be published in early August 2021.

Annex I Agenda of the of the 2nd Meeting of the Committee for Risk Assessment Working Group on Harmonised Classification and Labelling

Annex II List of participants

Annex III Declarations of potential conflicts of interest

Annex I

2nd Meeting of the Committee for Risk Assessment Working Group on Harmonised Classification and Labelling (RAC-58 CLHWG)

Monday 5 July starts at 09.30
Tuesday 6 July ends at 19:00

Times are Helsinki times
Virtual meeting

Final Agenda

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC WG/CLH/2/2021
For adoption

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Harmonised classification and labelling (CLH)

4.1 Hazard classes to be proposed for agreement without plenary debate (A-list) in RAC-58

- Clothianidin (ISO); (*E*)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine: acute oral toxicity
- Resorcinol; 1,3-benzenediol: acute toxicity via all routes, STOT SE

4.2 CLH dossiers

- 4.2.1 Clothianidin (ISO); (*E*)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine (EC 433-460-1; CAS 210880-92-5)
- 4.2.2 Dimethyl propylphosphonate (EC 242-555-3; CAS 18755-43-6)
- 4.2.3 hydrogen sulphide, hydrogen sulfide (EC 231-977-3; CAS 7783-06-4)
- 4.2.4 resorcinol; 1,3-benzenediol (EC 203-585-2; CAS 108-46-3)
- 4.2.5 silver (EC 231-131-3; CAS 7440-22-4)
- 4.2.6 Nonylphenol, branched and linear, ethoxylated (with average molecular weight < 352 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: 500-315-8; 500-024-6; 500-045-0; 500-209-1; 248-762-5; 243-816-4; 248-291-5; and others; CAS: 127087-87-0; 9016-45-9; 26027-38-3; 68412-54-4; 27986-36-3; 20427-84-3; 27176-93-8; 1119449-38-5 and others)
- 4.2.7 Nonylphenol, branched and linear, ethoxylated (with 352 g/mol ≤ average molecular weight < 704 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: 230-770-5; 248-743-1; 247-

- 555-7; 248-293-6 and others; CAS: 127087-87-0; 9016-45-9; 7311-27-5; 27942-27-4; 26264-02-8; 27177-05-5; 14409-72-4 and others)
- 4.2.8 Nonylphenol, branched and linear, ethoxylated (with 704 g/mol \leq average molecular weight \leq 1540 g/mol) [includes ortho-, meta-, para- isomers or any combination thereof] (EC: -; CAS: 127087-87-0; 9016-45-9 and others)
- 4.2.9 [1] Lithium carbonate; [2] lithium chloride; [3] lithium hydroxide (EC: [1] 209-062-5; [2] 231-212-3; [3] 215-183-4; CAS: [1] 554-13-2; [2] 7447-41-8; [3] 1310-65-)

For discussion

Item 5 – AOB

Item 6 – Adoption of the Report from the Working Group

For discussion and agreement

Annex II
List of participants

RAC members	
Barański	Bogusław
Biró	Anna
Bjørge	Christine
de la Flor Tejero	Ignacio
Doak	Malcolm
Geoffroy	Laure
Hakkert	Betty
Husa	Stine
Karadjova	Irina
Leinonen	Riitta
Martinek	Michal
Menard Srpčič	Anja
Moeller	Ruth
Mohammed	Ifthekhar Ali
Moldov	Raili
Murray	Brendan
Paris	Pietro
Pęczkowska	Beata
Printemps	Nathalie
Rodriguez	Wendy
Santonen	Tiina
Schulte	Agnes
Schuur	Gerlienke
Sogorb	Miguel
Stine Tobiassen	Lea
Uzomeckas	Zilvinas

RAC members' apologies	
Stahlmann	Ralf

Members' advisers	
Algharably Engi	(Ralf Stahlmann)
Boel Els	(Wendy Rodriguez)
Esposito Dania	(Pietro Paris)
Hoffmann Frauke	(Urs Schlueter)
Huuskonen Pasi	(Tiina Santonen)
Jomini Stéphane	(Nathalie Printemps - for Silver HH)
Larsen Janni	(Lea Stine Tobiassen - for Silver HH and Nonylphenols)
Losert Annemarie	(Manual Facchin)

Marinkovic Marino	(Gerlienke Schuur - for Silver ENV)
Martin Theresa	(Ralf Stahlmann)
Sonnenburg Anna	(Ralf Stahlmann)
van Herwijnen Rene	(Betty Hakkert - for Silver ENV)

Dossier submitters	Substance
Birgander Pernilla (SE)	Silver
Boqvist Pernilla (SE)	Silver
Brusila Elina (FI)	Resorcinol; 1,3-benzenediol (EC 203-585-2; CAS 108-46-3)
Charles Sandrine (FR)	Lithium
Conway Louise (IE)	Dimethyl propylphosphonate
Dang Zhichao (NL)	Nonylphenol, branched and linear, ethoxylated
Guillou Pauline (FR)	Lithium
Hahlbeck Edda (SE)	Silver

Regular stakeholder observers	
De Backer	Liisi (Cefic)
Ruelens	Paul (CropLife Europe)
Verougstraete	Violaine (Eurometaux)

Occasional Industry stakeholder observers	
Alami	Anisa (EPMF)
Niemelä	Helena (Concawe)

Stakeholder experts		Substance
Hoberman Alan	CropLife Europe/Argus Int. on behalf Sumitomo Chemical	Clothianidin
Jacobi Sylvia	Cefic/Albemarle	Lithium
Koehl Werner	Eurometaux/Albemarle	Lithium
Mertens Jelle	Cefic/EPMF	Silver
Raffray Mark	Eurometaux/EPMF covering silver registrants	Silver
Turner Chris	Cefic/Anthesis group	Resorcinol dossier
Vangheluwe Marnix	EPMF/Arche consulting	Silver
Hoberman Alan	CropLife Europe/Argus Int. on behalf Sumitomo Chemical	Clothianidin

European Commission		DG
Kilian	Karin	DG ENV

ECHA staff	
Bowmer	Tim (Chair)
Hellsten	Kati
Jones	Stella
Karjalainen	Antti
Korjus	Pia
Marchetto	Flavio
Myohanen	Kirsi
Perazzolo	Chiara
Sadam	Diana
Simoes	Ricardo
Sosnowski	Piotr
Spjuth	Linda
Uphill	Simon

Annex III

The following participants, including those for whom the Chairman declared the interest on their behalf, declared potential conflicts of interest with the Agenda items (according to Art 9 (2) of RAC RoPs)

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
ALREADY DECLARED AT PREVIOUS RAC PLENARY MEETING(S)		
Harmonised classification & labelling		
Lithium carbonate; lithium chloride; lithium hydroxide FR	Nathalie PRINTEMPS	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Laure GEOFFROY	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
1. Nonylphenol, branched and linear, ethoxylated (with average molecular weight < 352 g/mol) 2. Nonylphenol, branched and linear, ethoxylated (with 352 g/mol ≤ average molecular weight < 704 g/mol) 3. Nonylphenol, branched and linear, ethoxylated (with 704 g/mol ≤ average molecular	Betty HAKKERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Gerlienke SCHUUR	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
weight ≤ 1540 g/mol) NL		

Dossier / DS	RAC Member	Reason for potential CoI / Working for
NEW DOSSIERS		
Harmonised classification & labelling		
Silver SE	Ifthekhar Ali MOHAMMED	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
1. Clothianidin (ISO) 2. Hydrogen sulfide DE	Agnes SCHULTE	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on these substances - no other mitigation measures applied. No personal involvement.
Resorcinol FI	Tiina SANTONEN	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Riitta LEINONEN	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement.
Dimethyl propylphosphonate IE	Brendan MURRAY	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.

Dossier / DS	RAC Member	Reason for potential CoI / Working for
	Malcolm DOAK	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.