

Call for evidence on the use of D4/D5/D6 in consumer and professional products

Background document

In December 2016 the European Commission requested ECHA to prepare an Annex XV restriction dossier on octamethylcyclotetrasiloxane (D4) and decamethylcyclopentasiloxane (D5)¹. A call for evidence to support the preparation of this Annex XV dossier was open on the ECHA website from 03/05/2017 to 03/08/2017.

In February 2018 the European Commission requested that ECHA also include dodecamethylcyclohexasiloxane (D6) within the scope of their Annex XV dossier and submit a Dossier in January 2019². The use of D6 may pose the same unacceptable risk to the environment as the use of D4 and D5.

ECHA's Annex XV restriction dossier will therefore assess use of octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5) and dodecamethylcyclohexasiloxane (D6) in leave on cosmetic products and in other consumer/professional products (e.g. dry cleaning formulations, waxes, polishes and cleaning products). ECHA will assess the use of dodecamethylcyclohexasiloxane (D6) in wash off cosmetic products.

Evidence and information to be collected

The purpose of this call for evidence is therefore to gather information on the current uses of D6 in consumer and professional products, the content of D6 in these products and associated releases to the environment, as well as other relevant information for the preparation of an Annex XV restriction dossier. The call is also allows an opportunity to pose 'follow-up' questions relevant to the additional uses of D4 and D5 in consumer and professional products that have only become apparent since the initial call for evidence in 2017, specifically the use of D5 in art and antique cleaning and restoration.

Information on D4 and D5 already submitted in the previous call for evidence on the original scope of the restriction does not need to be re-submitted.

Specific questions for D6:

1. Information on the professional and consumer uses of D6 in cosmetics and personal care products, including both leave-on and wash off products.
2. Information on the professional and consumer uses of D6 in household products (e.g. washing, cleaning or other products used in or around the home).
3. Information on the professional and consumer uses of D6 in pharmaceutical products or medical devices.
4. Information on any other type of consumer or professional uses of D6 not explicitly mentioned above.

For each of the uses identified above we are interested in the following information:

¹ https://echa.europa.eu/documents/10162/13641/echa_commission_request_en.pdf/a0bdbb25-9641-9df1-9511-4208cac224ce

² https://echa.europa.eu/documents/10162/13641/note_to_echa_annex_xv_d6_en.pdf/722217b2-95c1-a5a0-90c5-82f2afed48f9

- If D6 is present in these products intentionally as a substance on its own, or in a mixture or as impurity (e.g. as unreacted monomer in a product containing a silicone polymer)
- The technical function of D6 in these products
- The concentration of D6 in these products
- The tonnage of D6 used in these products (yearly), and the trends
- The potential for release to the environment
- Any information on the suitability and availability of alternatives.
- Information on the impact of imposing a restriction on the use of D6 in these products. For example, in terms of costs and benefits to any affected actors (e.g. producers, professionals, consumers, or any other relevant actors), taking into consideration the possibility of the use of available alternatives? Impacts could include information on the reformulation activities necessary to comply with a restriction (number, cost and time for reformulation) or information on products that would be lost from the market.
- Where D6 is present as an impurity in a polymer please provide information on its concentration and the potential for release during use / service life.

Specific questions for D4 and D5:

1. We would be interested to know more about the professional and consumer uses of D4 and D5 in products used for the cleaning or restoration of antiques and art, and in particular:
 - Why are D4/D5 used in these products? What is their technical function?
 - What is the concentration of D4/D5 in these products?
 - How are these products used (e.g. instructions) and who is using them (e.g. museums, professionals, consumers)?
 - What is the European market for these products? Trends?
 - Availability of alternatives to these products and their technical performance and price compared to D4/D5 containing products
 - Information on the impact of imposing a restriction on the use of D4/D5 in these specific products be in terms of costs and benefits to any affected actors?

Additional relevant information for the preparation of an Annex XV restriction dossier is also welcome.

Who should participate in the call for evidence?

This call for evidence targets interested parties such as companies (manufacturers, suppliers, distributors, importers etc.), trade associations, scientific bodies and any other stakeholders holding relevant information. Information can be submitted confidentially and will be treated as such by ECHA.

Any information provided will be used, amongst other issues, to determine if any derogations are required for any potential restriction that is proposed. However, derogations cannot be proposed without adequate information on risk and socio-economic information, including alternatives. If a derogation is not proposed in the initial restriction proposal then it will be incumbent on relevant stakeholders to provide a full

justification based on a comprehensive information on risk, socio-economic elements and alternatives, during the opinion-making process.

ECHA invites interested parties to respond to the call for evidence by 18 June 2018.

<https://echa.europa.eu/calls-for-comments-and-evidence>

For any clarifications please contact: restriction-D4D5@echa.europa.eu