### **CLH** report

### Proposal for Harmonised Classification and Labelling

Based on Regulation (EC) No 1272/2008 (CLP Regulation), Annex VI, Part 2

# International Chemical Identification: tetraphosphorus trisulphide; phosphorus sesquisulphid

EC Number: 215-245-0

**CAS Number:** 1314-85-8

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#### 1 IDENTITY OF THE SUBSTANCE

#### 1.1 Name and other identifiers of the substance

Table 1: Substance identity and information related to molecular and structural formula of the substance

Name(s) in the IUPAC nomenclature or other international chemical name(s)	Tetraphosphorus trisulphide; phosphorus sesquisulphid
Other names (usual name, trade name, abbreviation)	Phosphorus sesquisulfide
ISO common name (if available and appropriate)	-
EC number (if available and appropriate)	215-245-0
EC name (if available and appropriate)	Tetraphosphorus trisulphide
CAS number (if available)	1314-85-8
Other identity code (if available)	015-012-00-1 (Index Number)
Molecular formula	P4S3
Structural formula	P S S
SMILES notation (if available)	S1P2P3P2SP1S3
Molecular weight or molecular weight range	220.09
Information on optical activity and typical ratio of (stereo) isomers (if applicable and appropriate)	-
Description of the manufacturing process and identity of the source (for UVCB substances only)	-
Degree of purity (%) (if relevant for the entry in Annex VI)	> 98.5%

#### 1.2 Composition of the substance

**Table 2: Constituents (non-confidential information)** 

Constituent (Name and numerical identifier)	Concentration range (% w/w minimum and maximum in multiconstituent substances)	Current CLH in Annex VI Table 3.1 (CLP)	Current self- classification and labelling (CLP)
Tetraphosphorus	> 98.5%	Flam. Sol. 2 (H228)	Flam. Solid 1 (H228)
trisulphide; phosphorus		Water-react. 1 (H260)	Water-react. 1 (H260)
sesquisulphid		Acute Tox. 4* (H302)	Acute Tox. 3 (H301)
		Aquatic Acute 1 (H400)	Aquatic Acute 1 (H400)
Index No 1314-85-8			STOT Rep. Exp. 2 (H373)
EC No 215-245-0			Skin Sens. 1 (H317)
CAS No1314-85-8			Eye Damage 1 (H318)

Current classification considers the new studies that were performed to fulfil the provisions of REACH Annex VIII. The minimum classification proposed in Annex VI of CLP is maintained.

Table 3: Impurities (non-confidential information) if relevant for the classification of the substance

Impurity	Concentration	Current CLH in	Current self-	The impurity
(Name and numerical	range	Annex VI Table 3.1	classification and	contributes to the
identifier)	(% w/w minimum	(CLP)	labelling (CLP)	classification and
	and maximum)			labelling
Water	< 0.4%	•	=	=
Unknown impurities of	< 1.5%	-	-	=
tetraphosphorus				
trisulphide; phosphorus				
sesquisulphid				

None contribute to the classification of the substance.

Table 4: Additives (non-confidential information) if relevant for the classification of the substance

Additive	Function	Concentration	Current CLH in	Current self-	The additive
(Name and		range	Annex VI Table	classification	contributes to
numerical		(% w/w	3.1 (CLP)	and labelling	the
identifier)		minimum and		(CLP)	classification
		maximum)			and labelling
-	-	-	-	-	-

None are present.

**Table 5: Test substances (non-confidential information)** 

Identification of test substance	Purity	Impurities and additives (identity, %, classification if available)	Other information	The study(ies) in which the test substance is used
Tetraphosphorus trisulphide; phosphorus sesquisulphid	99.1%	-	batch 040017 and batch CS9-6287	As detailed under the Annex I to the CLH report

The test items were sampled from representative batches of the production process (batch 040017 and batch **CS9-6287)** and are, therefore, equivalent to the substance for which a modified CLH is proposed.

#### 2 PROPOSED HARMONISED CLASSIFICATION AND LABELLING

#### 2.1 Proposed harmonised classification and labelling according to the CLP criteria

Table 6:

	International		International		Classificat	ion	Labelling			Specific Conc. Limits, M-factors	Notes
Index No	Index No	Index No Chemical Identification		CAS No	Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	015-012-00-1	tetraphosphorus trisulphide; phosphorus sesquisulphid	215-245-0	1314-85-8	Flam. Sol. 2 Water-react. 1 Acute Tox. 4 * Aquatic Acute 1	H228 H260 H302 H400	GHS02 GHS07 GHS09 Dgr	H228 H260 H302 H400			Т
Dossier submitters proposal	015-012-00-1	tetraphosphorus trisulphide; phosphorus sesquisulphid	215-245-0	1314-85-8	Modify Flam. Sol. 1 Add Self-heating Solid 1 Remove Water-react. 1 Aquatic Acute 1	Retain H228 Add H251 Remove H260 H400	Retain GHS02 GHS07 Dgr Remove GHS09	Retain H228 Add H251 Remove H260 H400			Retain T
Resulting Annex VI entry if agreed by RAC and COM	015-012-00-1	tetraphosphorus trisulphide; phosphorus sesquisulphid	215-245-0	1314-85-8	Flam. Sol. 1 Self-heating Solid 1 Acute Tox. 4 *	H228 H251 H302	GHS02 GHS07 Dgr	H228 H251 H302			Т

Note T:

#### CLH REPORT FOR TETRAPHOSPHORUS TRISULPHIDE; PHOSPHORUS SESQUISULPHID

This substance may be marketed in a form which does not have the physical hazards as indicated by the classification in the entry in Part 3. If the results of the relevant method or methods in accordance with Part 2 of Annex I of this Regulation show that the specific form of substance marketed does not exhibit this physical property or these physical hazards, the substance shall be classified in accordance with the result or results of this test or these tests. Relevant information, including reference to the relevant test method(s) shall be included in the safety data sheet.

[04.01-MF-003.01]

Table 7: Reason for not proposing harmonised classification and status under public consultation

Hazard class	Reason for no classification	Within the scope of consultation
Explosives	data conclusive but not sufficient for classification	Yes
Flammable gases (including chemically unstable gases)	hazard class not applicable	No
Oxidising gases	hazard class not applicable	No
Gases under pressure	hazard class not applicable	No
Flammable liquids	hazard class not applicable	No
Flammable solids	harmonised classification proposed	Yes
Self-reactive substances	data conclusive but not sufficient for classification	Yes
Pyrophoric liquids	hazard class not applicable	No
Pyrophoric solids	data conclusive but not sufficient for classification	Yes
Self-heating substances	harmonised classification proposed	Yes
Substances which in contact with water emit flammable gases	data conclusive but not sufficient for classification	Yes
Oxidising liquids	hazard class not applicable	No
Oxidising solids	data conclusive but not sufficient for classification	Yes
Organic peroxides	hazard class not applicable	No
Corrosive to metals	data conclusive but not sufficient for classification	Yes
Acute toxicity via oral route	not evaluated in this dossier	No
Acute toxicity via dermal route	not evaluated in this dossier	No
Acute toxicity via inhalation route	not evaluated in this dossier	No
Skin corrosion/irritation	not evaluated in this dossier	No
Serious eye damage/eye irritation	not evaluated in this dossier	No
Respiratory sensitisation	not evaluated in this dossier	No
Skin sensitisation	not evaluated in this dossier	No
Germ cell mutagenicity	not evaluated in this dossier	No
Carcinogenicity	not evaluated in this dossier	No
Reproductive toxicity	not evaluated in this dossier	No
Specific target organ toxicity- single exposure	not evaluated in this dossier	No
Specific target organ toxicity- repeated exposure	not evaluated in this dossier	No
Aspiration hazard	not evaluated in this dossier	No
Hazardous to the aquatic environment	data conclusive but not sufficient for classification	Yes
Hazardous to the ozone layer	not evaluated in this dossier	No

#### 3 HISTORY OF THE PREVIOUS CLASSIFICATION AND LABELLING

Tetraphosphorus trisulphide; phosphorus sesquisulphid was originally classified under Dangerous Substance Directive (67/548/EEC) as F; R11, Xn; R22. The classification was updated for environmental effects in 25<sup>th</sup> ATP (Dir. 98/98/EC).

The DSD classification was agreed by the TC Environmental Effects C&L in 1997 (Dir. 67/548/EEC) [ECBI/29/97 - Rev. 2]:

F; R11 Xn; R22 N; R50

The current CLP classification is a translation thereof and is included in Annex VI (CLP00):

Flam. Sol. 2; Water-react. 1; Acute Tox. 4 \*; Aquatic Acute 1

Classification as N; R50 was based on analogy with hydrogen sulphide. For tetraphosphorus trisulphide no  $LC_{50}$  data were available, but tetraphosphorus trisulphide reacts with water to form hydrogen sulphide which is classified N; R50, then the TC agreed that by analogy tetraphosphorus trisulphide should be classified with N; R50.

#### 4 JUSTIFICATION THAT ACTION IS NEEDED AT COMMUNITY LEVEL

[B.] Justification that action is needed at Community level is required.

Reason for a need for action at Community level:

• Change in existing entries due to new data

#### Further detail on need of action at Community level

According to new data, modification of the existing entries is appropriate. Additional studies have been recently carried out, which allow further assessment of the classification of the substance.

The requested change of harmonised classification removes this substance from the scope of the Seveso Directive (Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances), with appreciable socio-economic advantages similar to those mentioned above as well as for safety and awareness of the general population that lives nearby the Company Plant. The CLH report, initially drafted by Italmatch Chemicals S.p.A, was submitted by the Italian Istituto Superiore di Sanità (ISS) in accordance with article 37(6) of CLP.

#### 5 IDENTIFIED USES

Tetraphosphorus trisulphide; phosphorus sesquisulphid is an inorganic compound whose main and only application is in the industry of "strike anywhere" matches, where it totally replaced white and yellow phosphorus that were formerly used in the 19<sup>th</sup> century. The toxicity of white and yellow phosphorus, responsible of the "Fossy jaw" disease that caused osteonecrosis of the jaw to many workers, as well as their high reactivity made tetraphosphorus trisulphide the perfect alternative for matches industry.

The substance is registered under REACH at 10 - 100 tonnes per year.

The identified uses, as reported in the REACH registration dossier, are:

- Manufacturing
- Formulation
- Matches production

#### — Use of the match

The manufacturing process takes place in a very controlled area, due to the high flammability of the final product and the toxicity of the starting material yellow phosphorous. The total manufactured quantity is limited, never exceeding the quantity of 30 t/y, with an average of 15-20 t/y. However, as Italmatch Chemicals SpA is probably the only manufacturer, this substance maintains a strategic role. Description of the relevant manufacturing steps:

Starting materials:

Sulphur (CAS 7704-34-9; EC 231-722-6)

Yellow phosphorus (CAS 7723-14-0, 12185-10-3; EC 231-768-7)

Molten yellow phosphorus and sulphur react immediately at controlled temperature. The tetraphosphorus trisulphide formed is distilled, condensed in a water condenser and transferred to the subsequent crushing, milling and sieving steps.

Tetraphosphorus trisulphide is distributed among different sites in the EU and outside the EU. Tetraphosphorus trisulphide is usually packaged and handled at room temperature in contact with air. Yellow phosphorous spontaneously ignites in contact with air when present at concentrations down to 0.04%. No residual yellow phosphorous is therefore present in tetraphosphorus trisulphide at such concentration levels, since tetraphosphorus trisulphide is routinely handled in contact with air, but no spontaneous ignition occurs.

Next step in the life cycle is the formulation with a proper resin and other substances, like potassium chlorate (KClO<sub>3</sub>) which is a highly reactive oxidising agent that is necessary to promote combustion. The final product, containing about 15% tetraphosphorus trisulphide, is placed on the top of wood or plastic sticks and dried to make the final matches ready to use.

#### 6 DATA SOURCES

Tetraphosphorus trisulphide; phosphorus sesquisulphid is a chemical substance registered under REACH Regulation (EC) No 1907/2006. The present evaluation exclusively relies on data submitted in the registration dossier. Some details of the summaries were not included when considered not relevant for a decision on the classification and labelling of this substance. For more details the reader is referred to the registration dossier.

## 7 PHYSICOCHEMICAL PROPERTIES (AS IN THE IUCLID REGISTRATION DOSSIER)

**Table 8: Summary of physicochemical properties** 

Property	Value	Reference	Comment (e.g. measured or estimated)
Physical state at 20°C and 101.3 kPa	Solid	-	Visual
Melting/freezing point	174 °C		Measured
<b>Boiling point</b>	409 °C		Measured
Relative density	2.026 at 23 °C		Measured
Vapour pressure	1.3 * 10^-7 Pa		Estimated QSAR
Surface tension	Not applicable	-	-
Water solubility	29.3 mg/L at T= 20 °C pH= 3.6.		Measured
Partition coefficient n-octanol/water	-	-	-
Flash point	-	-	-

Property	Value	Reference	Comment (e.g. measured or estimated)
Flammability	Flammable solid	-	Measured
Explosive properties	Non explosive		According to the REACH Regulation according to the structural formula
Self-ignition temperature	84 °C		Measured
Oxidising properties	Non oxidising		According to the REACH Regulation, the study does not need to be conducted when the substance is highly flammable. Furthermore, the substance does not show oxidising properties based on its structural formula (it contains no oxygen or halogen atom).
Granulometry	$d90 = 268 \ \mu m$ $d50 = 83.0 \ \mu m$ $d10 = 15.1 \ \mu m$		Measured
Stability in organic solvents and identity of relevant degradation products	-	-	-
Dissociation constant	Not applicable	-	-
Viscosity	-	-	-

#### 8 EVALUATION OF PHYSICAL HAZARDS

The physical hazards of tetraphosphorus trisulphide; phosphorus sesquisulphid were evaluated by considering:

- the available experimental data on flammability, self-heating and ability of the substances to emit flammable gases when in contact with water (obtained according to the UN RTDG, Manual of Tests and Criteria: Test N.1, Test N.5 and Test N.4, respectively). Those data formed the basis for the proposed revision of the classification as a Flammable solid Category 1 instead of 2, for the proposed addition of the classification as a Self-heating substance Category 1, as well as for the proposed removal of the classification as a Water-reactive substance Category 1;
- <u>the molecule structure</u>, to check for structural alerts that would trigger the need to further investigate the explosive, self-reactive and oxidising properties;
- the experience of the applicant in the manufacturing and handling of the substance, to address spontaneous ignition when in contact with air at normal temperatures;
- the physical state of the substance.

More details are presented as follows.

#### 8.1 EXPLOSIVES

### 8.1.1 Short summary and overall relevance of the information provided on explosive properties

There are no chemical groups associated with explosive properties present in the molecule. In addition, no exothermic decomposition was observed during Differential Thermal Analysis (study reference: M. Leonardi and U. Zucchelli, Internal test report: Relative density, melting point, boiling point and flammability of P<sub>4</sub>S<sub>3</sub>,

2017). Since there are no indications from the screening procedure that tetraphosphorus trisulphide may possess explosive properties, no further testing is deemed necessary.

#### 8.1.2 Comparison with the CLP criteria

According to the CLP Regulation (EC n.1272/2008, Annex I, Part 2, paragraphs 2.1.4.2 and 2.1.4.3):

A substance or mixture shall not be classified as explosive:

- (a) When there are no chemical groups associated with explosive properties present in the molecule. Examples of groups which may indicate explosive properties are:
- C-C unsaturation (e.g. acetylenes, acetylides, 1, 2-dienes),
- C-Metal, N-Metal (e.g. Grignard reagents, organo-lithium compounds),
- Contiguous nitrogen atoms (e.g. azides, aliphatic azo compounds, diazonium salts, hydrazines, sulphonylhydrazides)
- Contiguous oxygen atoms (e.g. peroxides, ozonides)
- N-O (e.g. hydroxyl amines, nitrotes, nitro compounds, nitroso compounds, N-oxides, 1,2-oxazoles)
- N-halogen (e.g. chloramines, fluoroamines)
- O-halogen (e.g. chlorates, perchlorates, iodosyl compounds)

or

(b) When the substance or mixture contains chemical groups associated with explosive properties which include oxygen and the calculated oxygen balance is less than -200.

or

(c) When the organic substance or a homogenous mixture of organic substances contains chemical groups associated with explosive properties but the exothermic decomposition energy is less than 500 J/g and the onset of exothermic decomposition is below 500 °C (the temperature limit is to prevent the procedure being applied to a large number of organic materials which are not explosive but which will decompose slowly above 500 °C to release more than 500 J/g). The exothermic decomposition energy may be determined using a suitable calorimetric technique.

or

- (d) For mixtures of inorganic oxidizing substances with organic material(s), the concentration of the inorganic oxidising substance is:
- less than 15 % by mass, if the oxidizing substance is assigned to Categories 1 or 2;
- less than 30 % by mass, if the oxidizing substance is assigned to Category 3.

As regards tetraphosphorus trisulphide, there are no chemical groups associated with explosive properties in the molecule. As a result, condition (a) is satisfied, whereas condition (b) is not applicable. Condition (c) is not applicable, because tetraphosphorus trisulphide is not an organic substance and does not contain chemical groups associated with explosive properties; in addition, no exothermic decomposition was observed during Differential Thermal Analysis (study reference: M. Leonardi and U. Zucchelli, Internal test report: Relative density, melting point, boiling point and flammability of P<sub>4</sub>S<sub>3</sub>, 2017). Condition (d) is not applicable, either, being tetraphosphorus trisulphide a substance, not a mixture.

Since there are no indications from the screening procedure that the substance may possess explosive properties, no further testing is deemed necessary.

#### 8.1.3 Conclusion on classification and labelling for explosive properties

Tetraphosphorus trisulphide fulfils criterion (a) of the screening procedure provided for explosive properties (no chemical groups associated with explosive properties). It can be concluded that tetraphosphorus trisulphide is not to be classified as explosive, according to the CLP Regulation (EC n.1272/2008).

#### 8.2 FLAMMABLE GASES (INCLUDING CHEMICALLY UNSTABLE GASES)

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.3 OXIDISING GASES

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.4 GASES UNDER PRESSURE

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.5 FLAMMABLE LIQUIDS

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.6 FLAMMABLE SOLIDS

Table 9: Summary table of studies on flammable solids

Method	Results	Remarks	Reference
UN Recommendations on the Transport of Dangerous Good (RTDG), Manual of Tests and Criteria: Test N.1 (Test method for readily combustible solids)	The screening test was positive (burning time: 39 s) and the full burning rate test was performed. Burning times: 30, 25, 27, 26, 31, and 29 s. The wet zone did not stop the propagation of the flame	Batch number: 040017  No GLP compliance	Leonardi M and Zucchelli U, 2017

#### 8.6.1 Short summary and overall relevance of the provided information on flammable solids

The flammability of the substance was tested according to the UN Recommendations on the Transport of Dangerous Good (RTDG), Manual of Tests and Criteria: Test N.1 (Test method for readily combustible solids). The screening test was positive (the burning of a 200 mm length of the powder train occurred in 39 s) and, therefore, the full burning rate test was performed. The burning times of the test item were less than 45 s: 30, 25, 27, 26, 31, and 29 s. In each and any of the six test runs, the wet zone did not stop the propagation of the flame.

#### 8.6.2 Comparison with the CLP criteria

According to the CLP Annex I, Part 2, table 2.7.1. a solid is considered flammable in Category 1 if in the burning rate of the test substance: (a) wetted zone does not stop fire and (b) burning time <45 seconds or burning rate >2.2 mm/s. For Category 2 it is required that (a) wetted zone stops the fire for at least 4 minutes and (b) burning time <45 seconds or burning rate >2.2 mm/s.

#### 8.6.3 Conclusion on classification and labelling for flammable solids

Under the experimental conditions of the UN RTDG, Manual of Tests and Criteria: Test N.1, the burning times of the test item were less than 45 s. In each and any of the six test runs, the wet zone did not stop the propagation of the flame. It can be concluded that tetraphosphorus trisulphide should be classified as Flammable solid Category 1 with hazard statement H228 (Flammable solid), retaining the pictogram "GHS02: Flame" with the signal word "Danger", according to the CLP Regulation (EC n.1272/2008).

#### 8.7 SELF-REACTIVE SUBSTANCES

### 8.7.1 Short summary and overall relevance of the provided information on self-reactive substances

Tetraphosphorus trisulphide does not contain any functional group that might trigger the classification as a self-reactive substance. In addition, no exothermic decomposition was observed during Differential Thermal Analysis (study reference: M. Leonardi and U. Zucchelli, Internal test report: Relative density, melting point, boiling point and flammability of P<sub>4</sub>S<sub>3</sub>, 2017). No further testing is, therefore, deemed as necessary.

#### 8.7.2 Comparison with the CLP criteria

According to the CLP Regulation (EC n.1272/2008, Annex I, Part 2, paragraph 2.8.4.2):

Substances and mixtures must be considered for classification in this hazard class as a self-reactive substance or mixture unless:

(a) There are no chemical groups present in the molecule associated with explosive or self-reactive properties; examples of such groups are given in Tables A6.1 and A6.2 in Appendix 6 of the UN RTDG, Manual of Tests and Criteria.

#### 8.7.3 Conclusion on classification and labelling for self-reactive substances

There are no chemical groups or any other indications associated with explosives or self-reactive properties in the molecule. It can be concluded that tetraphosphorus trisulphide is not to be classified as a self-reactive substance, according to the CLP Regulation (EC n.1272/2008).

#### 8.8 PYROPHORIC LIQUIDS

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.9 PYROPHORIC SOLIDS

#### 8.9.1 Short summary and overall relevance of the provided information on pyrophoric solids

Experience in manufacturing and handling of tetraphosphorus trisulphide demonstrates the stability of the substance in air at room temperature for prolonged periods of time. No further testing is, therefore, deemed as necessary.

#### 8.9.2 Comparison with the CLP criteria

According to the CLP Regulation (EC n.1272/2008, Annex I, Part 2, paragraph 2.10.1):

Pyrophoric solid means a solid substance or mixture which, even in small quantities, is liable to ignite within five minutes after coming into contact with air.

#### 8.9.3 Conclusion on classification and labelling for pyrophoric solids

Based on the applicant's experience in the manufacturing and handling of the substance, it can be concluded that tetraphosphorus trisulphide is not to be classified as a pyrophoric solid, according to the CLP Regulation (EC n.1272/2008).

#### 8.10 SELF-HEATING SUBSTANCES

Table 10: Summary table of studies on self-heating substances

Method	Results	Remarks	Ref.
UN Recommendations on the Transport of Dangerous Good (RTDG), Manual of Tests and Criteria: Test N. 4 (Test method for self-heating solids)	Exothermic activity and ignition were observed in a 25 mm sample cube at 140°C, with a temperature rise of ca. 340°C. On completion of the test, no sample remained.	Batch number: CS9-6287 GLP study No deviations	Younis S, 2020

### **8.10.1** Short summary and overall relevance of the provided information on self-heating substances

The self-heating properties of the substance were tested according to the UN Recommendations on the Transport of Dangerous Goods (RTDG), Manual of Tests and Criteria: Test N.4 (Test method for self-heating solids). The substance was tested in a 25 mm sample cube at 140°C. A positive test result (i.e. dangerous self-heating) was observed, i.e. spontaneous ignition occurred, with the sample temperature exceeding the oven temperature by more than 60°C during the 24-hr period.

#### 8.10.2 Comparison with the CLP criteria

According to the CLP Annex I, Part 2, table 2.11.1. the classification criteria for self-heating substances or mixtures are:

Category 1: A positive result is obtained in a test using a 25 mm sample cube at 140°C

Category 2: (a) a positive result is obtained in a test using a 100 mm sample cube at 140°C and a negative result is obtained in a test using a 25 mm cube sample at 140°C and the substance or mixture is to be packed in packages with a volume of more than 3 m³; or (b) a positive result is obtained in a test using a 100 mm sample cube at 140°C and a negative result is obtained in a test using a 25 mm cube sample at 140°C, a positive result is obtained in a test using a 100 mm cube sample at 120°C and the substance or mixture is to be packed in packages with a volume of more than 450 litres; or (c) a positive result is obtained in a test using a 100 mm sample cube at 140°C and a negative result is obtained in a test using a 25 mm cube sample at 140°C and a positive result is obtained in a test using a 100 mm cube sample at 100°C.

#### 8.10.3 Conclusion on classification and labelling for self-heating substances

Under the experimental conditions of the UN RTDG, Manual of Tests and Criteria: Test N.4, a positive test result (i.e. dangerous self-heating) was observed in a 25 mm sample cube at 140°C, where spontaneous ignition occurred, with the sample temperature exceeding the oven temperature by more than 60°C during the 24-hr period. It can be concluded that tetraphosphorus trisulphide should be classified as a Self-heating substance Category 1 with hazard statement H251 (Self-heating: may catch fire), with the pictogram "GHS02: Flame" and with the signal word "Danger", according to the CLP Regulation (EC n.1272/2008).

## 8.11 SUBSTANCES WHICH IN CONTACT WITH WATER EMIT FLAMMABLE GASES

Table 11: Summary table of studies on substances which in contact with water emit flammable gases

Method	Results	Remarks	Reference
UN Recommendations on the	Preliminary steps (1 to 3): no gas	Batch number:	Younis S, 2020
Transport of Dangerous Good	generation or spontaneous ignition. Final	CS9-628	
(RTDG), Manual of Tests and	step: no spontaneous ignition after 5 days		
Criteria: Test N. (Test method	for test number 1 and after 7 hours for test		
for substances which in contact	number 2-3.		
with water emit flammable	The generated gas was flammable during		
gases)	test number 1, with a maximum rate of gas	GLP study	
	generation of 0.7 L kg <sup>-1</sup> h <sup>-1</sup>	No deviations	

# 8.11.1 Short summary and overall relevance of the provided information on substances which in contact with water emit flammable gases

The ability of the substance to emit flammable gases on contact with water was tested according to the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Test N.5. (Test method for substances which in contact with water emit flammable gases).

Three preliminary steps and a final step were conducted. The test item was not sieved prior to testing, due to concerns about potential reaction during the sieving process. No stirring was performed at any stage of the analysis.

No gas generation or spontaneous ignition was observed in the preliminary steps (1 to 3). During the final step, no spontaneous ignition was observed after 5 days for test number 1 and after 7 hours for test number 2-3. The generated gas was, however, flammable during test number 1, with a maximum rate of gas generation of 0.7 L kg<sup>-1</sup>h<sup>-1</sup>.

After Step 4, test 1 the evolved gas was analysed using a mass spectrometer and an increased response was found on mass numbers 12, 14, 16, 17, 28, 32, 34, 40 and 44. The increase in mass numbers 32 and 34 is suspected to be due to hydrogen sulphide H<sub>2</sub>S, which is classified as Flammable gas Category 1 with hazard statement H220 (Extremely flammable gas).

The maximum rate of gas generated for step 4 test 1 was observed between 99 and 100 hours.

#### 8.11.2 Comparison with the CLP criteria

According to the CLP Annex I, Part 2, table 2.12.1. the classification criteria for substances or mixtures which in contact with water emit flammable gas are:

Category 1: any substance or mixture which reacts vigorously with water at ambient temperatures and demonstrates generally a tendency for the gas produced to ignite spontaneously, or which reacts readily with water at ambient temperatures such that the rate of evolution of flammable gas is equal to or greater than 10 litres per kilogram of substance over any one minute.

Category 2: any substance or mixture which reacts readily with water at ambient temperatures such that the maximum rate of evolution of flammable gas is equal to or greater than 20 litres per kilogram of substance per hour, and which does not meet the criteria for Category 1.

Category 3: any substance or mixture which reacts slowly with water at ambient temperatures such that the maximum rate of evolution of flammable gas is equal to or greater than 1 litre per kilogram of substance per hour, and which does not meet the criteria for Categories 1 and 2.

# 8.11.3 Conclusion on classification and labelling for substances which in contact with water emit flammable gases

Under the experimental conditions of the UN RTDG, Manual of Tests and Criteria: Test N.5, no gas generation or spontaneous ignitions was observed in the preliminary steps. During the final step, no spontaneous ignition was observed after 5 days for test number 1 and after 7 hours for test numbers 2-3. The generated gas was, however, flammable during test number 1, with a maximum rate of gas generation of 0.7 L kg<sup>-1</sup> h<sup>-1</sup>. It can be concluded that no classification as per CLP Regulation (EC) No. 1272/2008 should be given for tetraphosphorus trisulphide.

#### 8.12 OXIDISING LIQUIDS

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

#### 8.13 OXIDISING SOLIDS

#### 8.13.1 Short summary and overall relevance of the provided information on oxidising solids

Tetraphosphorus trisulphide satisfies the screening criteria reported in the CLP Regulation, equivalent in principle to Section 6 of Appendix 6 to the UN RTDG, Manual of Tests and Criteria, since it is an inorganic substance which does not contain any oxygen or halogen atom. In addition, testing is not applicable to flammable solids.

#### 8.13.2 Comparison with the CLP criteria

According to the CLP Regulation (EC n. 1272/2008), 2.14.4.1 section, for organic substances or mixtures the classification procedure for the oxidising substance class shall not apply if:

- the substance or mixture does not contain oxygen, fluorine or chlorine; or
- the substance or mixture contains oxygen, fluorine or chlorine and these elements are chemically bound only to carbon or hydrogen.

For inorganic substances or mixtures, the classification procedure shall not apply if they do not contain oxygen or halogen atoms.

#### 8.13.3 Conclusion on classification and labelling for oxidising solids

Tetraphosphorus trisulphide does not contain any oxygen or halogen atoms. According to the screening procedure provided for the identification of oxidizing solids, it can be concluded from its structure that tetraphosphorus trisulphide is not to be classified as an oxidizing solid, according to the CLP Regulation (EC n.1272/2008).

#### 8.14 ORGANIC PEROXIDES

Hazard class not applicable, the substance evaluated in this dossier is not an organic peroxide.

#### 8.15 CORROSIVE TO METALS

Hazard class not applicable, due to the physical state of the substance evaluated in this dossier (solid).

There is no reference in the definition of corrosive to metals (as in the CLP regulation, Annex I, 2.16.1 section) to the physical state of the substances or mixtures that need consideration for potential classification in this hazard class. However, according to the classification criteria, only substances and mixtures for which the application of the UN Test C.1 (described in part III, Section 37.4.1.1 of the UN RTDG, Manual of Tests and Criteria) is relevant need to be considered.

Application of classification criteria in the UN RTDG, Manual of Tests and Criteria, Section 37.4 excludes solids, while 'liquids and solids that may become liquids (during transport)', should be considered for such a classification. It can be concluded that, based on its physical state (solid) and melting point (174°C / Study reference: M. Leonardi and U. Zucchelli, Internal test report: Relative density, melting point, boiling point and flammability of P4S3, 2017), this hazard class does not apply to tetraphosphorus trisulphide.

### 9 TOXICOKINETICS (ABSORPTION, METABOLISM, DISTRIBUTION AND ELIMINATION)

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

# 9.1 Short summary and overall relevance of the provided toxicokinetic information on the proposed classification(s)

The provided toxicokinetic information are not relevant for the proposed classification.

#### 10 EVALUATION OF HEALTH HAZARDS

#### 10.1 ACUTE TOXICITY-ORAL ROUTE

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.2 ACUTE TOXICITY-DERMAL ROUTE

Not evaluated in this dossier.

#### 10.3 ACUTE TOXICITY-INHALATION ROUTE

Not evaluated in this dossier.

#### 10.4 SKIN CORROSION/IRRITATION

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.5 SERIOUS EYE DAMAGE/EYE IRRITATION

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.6 RESPIRATORY SENSITISATION

Not evaluated in this dossier.

#### 10.7 SKIN SENSITISATION

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.8 GERM CELL MUTAGENICITY

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.9 CARCINOGENICITY

Not evaluated in this dossier.

#### 10.10 REPRODUCTIVE TOXICITY

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.11 SPECIFIC TARGET ORGAN TOXICITY-SINGLE EXPOSURE

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.12 SPECIFIC TARGET ORGAN TOXICITY-REPEATED EXPOSURE

Not evaluated in this dossier. For further details refer to the REACH Registration Dossier.

#### 10.13 ASPRIRATION HAZARD

Not evaluated in this dossier.

#### 11 EVALUATION OF ENVIRONMENTAL HAZARDS

#### 11.1 RAPID DEGRADABILITY OF ORGANIC SUBSTANCES

#### 11.1.1 Ready biodegradability

The study was not conducted since tetraphosphorus trisulphide; phosphorus sesquisulphid is inorganic. According to section 4.1.2.10.1 of the CLP "For inorganic compounds and metals, the concept of degradability as applied to organic compounds has limited or no meaning".

#### 11.1.2 BOD<sub>5</sub>/COD

Not available.

#### 11.1.3 Hydrolysis

Table 12: Summary table of studies on hydrolysis

Method	Test material	Results	Remarks	Reference
OECD TG 111	Tetraphosphorus trisulphide; phosphorus sesquisulphid Purity: 99.1%	No gas evolution (H <sub>2</sub> S) at pH 4, 7 and 8	No GLP	Nebuloni M, 2017

The stability of the tetraphosphorus trisulphide to hydrolysis was investigated according to OECD TG 111.

The experiment was performed to determine:

- (i) the rate of hydrolysis of the test substance as a function of pH and
- (ii) the identity or nature and rates of formation of hydrolysis products

This investigation was carried out by monitoring the hydrogen sulphide ( $H_2S$ ) evolution in different buffer pH solutions (pH= 4, 7 and 8) for 5 days. The gaseous product ( $H_2S$ ) was collected and measured by a device connected to the container according to the Dietrich-Fruhling method. From the volume of the produced gas ( $H_2S$ ) in relation to the sample amount and from the volume evolution on the time, it was possible to assess abiotic hydrolytic transformations of  $P_4S_3$  in aquatic systems at pH values normally found in the environment. For the assessment, the solubility at room temperature of  $H_2S$  in water was also considered. From the information available in literature, the solubility of  $H_2S$  in water is indicated as 0.385 g/100 g  $H_2O$ .

No gas evolution was noted in any of the pHs tests (4, 7 and 8) therefore it is assumed that the hydrolysis rate of the substance under the tested conditions is close to 0%. There was however a minor decrease of the pH of the solutions (from pH 7 to 6.5 and from pH 8 to 7.3) that could be ascribed to a low amount of phosphates and to the  $H_2S$  developed during the 5-day test. If any H2S was formed it could be below the limit of detection of the analytical method used and therefore this is only an assumption based on the decrease of pH.

In conclusion, tetraphosphorus trisulphide is stable to hydrolysis at room temperature in acid, neutral and basic conditions.

The reliability of the study as per its Registration dossier is 2 (reliable with restrictions) according to the Klimisch criteria. The study was conducted as per the OECD Guideline 111 and was sufficiently described and it meets the acceptable scientific criteria. However, a reliability of 2 was given as the study was not conducted under GLP conditions. Also some deviations from the OECD Guideline 111 were noted, such as the pHs used were 4, 7 and 8 instead of 4, 7 and 9 and the temperature of the preliminary study was at 20°C instead of 50°C. Nevertheless these deviations are not considered to impact the reliability of the study.

#### 11.1.4 Other convincing scientific evidence

No other scientific evidence is available.

### 11.2 ENVIRONMENTAL TRANSFORMATION OF METALS OR INORGANIC METAL COMPOUNDS

Not applicable.

#### 11.3 ENVIRONMENTAL FATE AND OTHER RELEVANT INFORMATION

The substance is an inorganic compound that is not hydrolysed. Some of the properties such as ready biodegradation and logKow are not available since the studies were not conducted due to the inorganic nature of the substance. However, a calculated LogKow (EpiSuite v.4.11) suggests that the substance has a low potential for bioaccumulation. Furthermore, a predicted value for partition coefficient organic carbon-water was calculated by EUSES 2.1.2 as Koc = 0.82 L/kg. Considering this predicted value, a low adsorption potential is expected.

To sum up, the hydrolysis and biodegradation are not expected to be the principal degradation route in the environment and the substance should have a low bioaccumulation potential.

#### 11.4 BIOACCUMULATION

Not evaluated in this dossier as these data are not available. The Partition coefficient of the substance is not available as the substance is an inorganic compound. However, EPI Suite v.4.11 calculated the value of -0.23, even though inorganic salts are out of the applicability domain. A logKow lower than 4 suggests a low potential for bioaccumulation.

#### 11.5 ACUTE AQUATIC HAZARD

Table 13: Summary of relevant information on acute aquatic toxicity

Method	Species	Test material	Results <sup>1</sup>	Remarks	Reference
OECD TG	Danio Rerio	Tetraphosphorus	LC <sub>50</sub> 96 h >100	Batch number:	Anonymous
203		trisulphide; phosphorus	mg/L (loading	040017	(2017)
		sesquisulphid	rate)	GLP compliance	
		Purity: 99.1%	> 5.82 mg/L		
			(geometric mean		
			0-96 h)		
			pH 6.7-8.1		
			(0h; 96h)		
OECD TG	Daphnia	Tetraphosphorus	$EC_{50} 48 h > 100$	Batch number:	Anonymous
202	Magna	trisulphide; phosphorus	mg/L (loading	040017	(2017)
		sesquisulphid	rate)	GLP compliance	
		Purity: 99.1%	>2.8 mg/L		
			(geometric mean		
			0-48 h)		
			pH 6.7-7.1		
			(0h; 48h)		
OECD TG	Desmodesmus	Tetraphosphorus	$E_rC_{50}$ 72 h >100	Batch number:	Anonymous
201	subspicatus	trisulphide; phosphorus	mg/L (loading	040017	(2017)
		sesquisulphid	rate)	GLP compliance	
		Purity: 99.1%	>2.5 mg/L		
			(geometric mean		
			0-72 h)		
			pH 7.4-8.2		
			(0h; 72h)		

OECD TG	Micro-	Tetraphosphorus	$EC_{50} 3h = 471$	Batch number:	Anonymous
209	organisms in	trisulphide; phosphorus	mg/L (nominal	040017	(2017)
	an activated	sesquisulphid	concentration)	GLP compliance	
	sludge	Purity: 99.1%	and NOEC =		
		-	31.6 mg/L		

#### 11.5.1 Acute (short-term) toxicity to fish

The acute lethal toxicity of tetraphosphorus trisulphide to the Zebrafish *Danio rerio* was investigated according to test guideline OECD TG 203 and EU Mehod C.1., under static exposure conditions over a period of 96 h.

The only applied loading rate was 100 mg/L. Therefore, this study represents a limit test. This test concentration was chosen based on preceding acute toxicity tests carried out with *Algae* and *Daphnia*, where a 72h  $E_rC_{50}$  of >100 mg/L and a 48 h  $EC_{50}$  of >100 mg/L, based on loading rates, were determined, respectively.

The test item is solid, poorly soluble (29.3 mg/L at a pH 3.6 and ca. 20 °C), with a purity of 99.1%. Therefore, the test medium consisted of a saturated stock solution, prepared by addition of the test item to natural water, 96-h stirring and filtration. The concentration of the substance was determined by phosphorus-analytics at the beginning and at the end of the exposure phase. These analyses confirmed the low solubility of the test item. The effective concentrations were assessed based on the geometric mean of the measured concentrations of the test item, as well as on the loading rates. The substance in the fish medium presents a solubility between 5.8-5.9 mg/L that corresponds to the measured concentration at 0 and 96 h. The pH of the test solution at 0h is 6.7 and at 96 h is 8.1.

At the loading rate of 100 mg/L of tetraphosphorus trisulphide, none of a total of seven fish died after 96 h of exposure. No mortality was observed in the blank control.

Toxic effects other than mortality, such as loss of coordination, hypo- or hyperactivity and swimming on the back, were not observed.

The no-observed-effect concentration (NOEC) was 5.82 mg/L mean measured concentration (based on phosphorus-analytics) or 100 mg/L loading rate.

Based on the binominal theory, the absence of mortality in such a test design provides at least 99% confidence that the median lethal concentration ( $LC_{50}$ ) of the test item to *Danio rerio* (Zebrafish) is greater than the measured concentration of 5.82 mg/L or 100 mg/L loading rate.

The study was conducted as per the OECD 203 guideline and under GLP conditions. As per the Guidance on CLP criteria (version 5, July 2017), tests consistent with OECD Test Guideline 203 (Fish 96-hour  $LC_{50}$ ) or equivalent should be used for classification. No deviations from the guideline were reported. The study is considered to have a reliability of 1 (reliable without restriction) as per Klimisch criteria and it is considered as reliable to be used for the CLP classification.

#### 11.5.2 Acute (short-term) toxicity to aquatic invertebrates

The median effect concentration (EC<sub>50</sub>) and the no-effect concentration (NOEC) of tetraphosphorus trisulphide to *Daphnia magna* were investigated under static exposure conditions over a period of 48 h, following guideline OECD TG 202 and EU Method C.2.

The test item tetraphosphorus trisulphide is solid, poorly soluble (29.3 mg/L at a pH 3.6 and ca. 20 °C), with a purity of 99.1%. The test solutions were prepared by directly adding the test item to *Daphnia* medium in a glass vessel, stirring this mixture for 96 h and filtering it. The single investigated loading rate was 100 mg/L. Forty individual *Daphnia* divided into 2 test vessels were exposed to the test item, and 60 *Daphnia* divided into 3 test vessels were used as blank controls. The determination of the test item concentrations was based on phosphorus-analytics (photometry after a chemical extraction step). Total phosphorus (total P) was measured at the beginning and at the end of the test. These analyses revealed that the concentrations of test item were stable over the whole 48 h period and corresponded to 2.8% and 2.7% of the nominal loading rate

at the beginning and end of the test, respectively. The substance in *Daphnia* medium presents a solubility around 3 mg/l that corresponds to the measured concentration at 0 (2.76 mg/L) and 48 h (2.74 mg/L). The pH of the test solution at 0h is 6.7 and at 48 h is 7.1.

The effective concentrations EC<sub>x</sub> were assessed based on the loading rates of the test item as well as on the measured concentration.

No significant effects ( $\leq$ 10% immobilization) were observed at 100 mg/L loading rate or in the blank controls, neither after 24 h of exposure nor after 48 h. Therefore, the median effect concentrations (EC<sub>50</sub>) of tetraphosphorus trisulphide on *Daphnia magna* after 24 h as well as after 48 h of exposure were estimated to be >100 mg/L loading rate or >2.8 mg/L measured concentration.

The NOEC values after 24 h and after 48 h of exposure were 100 mg/L loading rate or 2.8 mg/L measured concentration. All validity criteria were fulfilled.

The study was conducted as per the OECD 202 guideline and under GLP conditions. As per the Guidance on CLP criteria (version 5, July 2017), tests consistent with Guideline 202 Part 1 (Daphnia acute) or USA-EPA OPPTS 850.1035 (Mysid acute toxicity) or equivalent should be used for classification. No deviations from the guideline were reported. The study is considered to have a reliability of 1 (reliable without restriction) as per Klimisch criteria and it is considered as reliable to be used for the CLP classification.

#### 11.5.3 Acute (short-term) toxicity to algae or other aquatic plants

The growth inhibitory effects of tetraphosphorus trisulphide to the green alga *Desmodesmus subspicatus* were investigated according to test guideline OECD TG 201, over a period of 72 h.

The test item is solid, poorly soluble (29.3 mg/L at a pH 3.6 and ca. 20 °C), with a purity of 99.1%. The test solutions were prepared by directly adding the test item to algal medium in a glass vessel, stirring this mixture for 96 h and filtering it. The only loading rate was 100 mg/L. Six parallel test vessels were used for the test item and six for the blank controls. The determination of the test item concentrations was based on phosphorus-analytics (photometry after a chemical extraction step). Total phosphorus (total P) was measured at the beginning and at the end of the test. These analyses revealed that the concentrations of test item were stable over the whole 48 h period and corresponded to 2.8% and 2.2% of the nominal loading rate at the beginning and end of the test, respectively. The substance in the algae medium presents a solubility between 2-3 that corresponds to the measured concentration at 0 (2.8 mg/L) and 72 h (2.21 mg/L). The pH of the test solution at 0h is 7.4 and at 72 h is 8.2.

The effective concentrations  $EC_x$  were assessed based on the loading rates of the test item as well as on the measured concentration. With respect to both endpoints growth rate and yield (algal biomass), no significant effects were observed at 100 mg/L loading rate, as compared to the blank controls.

Therefore, 72h  $E_rC_{50}$  and  $E_yC_r$  values of the test item on the green alga *Desmodesmus subspicatus* were estimated to be >100 mg/L loading rate or >2.5 mg/L measured concentration. The NOE<sub>r</sub>C and NOE<sub>y</sub>C values were both 100 mg/L loading rate or 2.5 mg/L measured concentration. All validity criteria were fulfilled.

The study was conducted as per the OECD 201 guideline and under GLP conditions. As per the Guidance on CLP criteria (version 5, July 2017) tests consistent with OECD Test Guideline 201 (Algal growth inhibition) should be used. No deviations from the guideline were reported. The study is considered to have a reliability of 1 (reliable without restriction) as per Klimisch criteria and it is considered as reliable to be used for the CLP classification.

#### 11.5.4 Acute (short-term) toxicity to other aquatic organisms

The respiration inhibitory effects of tetraphosphorus trisulphide to the microorganisms of activated sludge of a municipal sewage treatment plant were investigated according to test guideline OECD TG 209, under aerobic static conditions over an exposure time of 3 hours.

The loading rates of the test item were 1000, 316, 100, 31.6 and 10.0 mg/L.

Three parallel test vessels were used for each concentration of the test item and six vessels for the blank controls.

No chemical analysis of test concentrations was conducted. For the calculation of the effective concentrations, the loading rates of the test item were used, assuming the test item to be stable in water over 3 h.

After 3 hours of exposure, the following inhibition of the activated sludge respiration was observed, as compared to the blank controls: 61 % at 1000 mg/L, 47 % at 316 mg/L and 22 % at 100 mg/L. No significant inhibition was observed at 31.6 and 10.0 mg/L.

The EC<sub>50</sub> 3h value of tetraphosphorus trisulphide to activated sludge is 471 mg/L (95% confidence limit: 372 - 619 mg/L).

The no observed concentration (NOEC) was 31.6 mg/L, as determined by Dunnett's test.

#### 11.6 LONG-TERM AQUATIC HAZARD

No long-term studies on fish or aquatic invertebrates are available. The NOEC value determined in the study on aquatic plants can be used for the long-term aquatic hazard evaluation (refer to section 11.5.3).

#### 11.7 COMPARISON WITH THE CLP CRITERIA

#### 11.7.1 Acute aquatic hazard

The acute aquatic toxicity was evaluated on the three aquatic trophic levels: fish, aquatic invertebrates and algae. The following results were obtained in the experimental studies conducted according to the relevant OECD Guidelines:

- $LC_{50}$  96h *Danio Rerio* >100 mg/L loading rate; > 5.82 mg/L (measured concentration): experimental data obtained testing the substance according to OECD TG 203.
- $EC_{50}$  48h *Daphnia Magna* >100 mg/L loading rate; > 2.8 mg/L (measured concentration): experimental data obtained testing the substance according to OECD TG 202.
- $ErC_{50}$  72h *Desmodesmus subspicatus* >100 mg/L (loading rate); > 2.5 mg/L (measured concentration): experimental data obtained testing the substance according to OECD TG 201.

The substance does not present any toxic effects on the three organisms and therefore no sensitive species has been identified. More specifically no fish were found dead, no daphnids were immobilised and the algal growth inhibition was 0.2% at the highest concentrations tested at each study (100 mg/L loading rate). The LC<sub>50</sub> and the EC<sub>50</sub> for daphnia and algae were found to be above the minimum CLP criteria of 1 mg/l so Aquatic Acute classification is not warranted.

#### 11.7.2 Long-term aquatic hazard (including bioaccumulation potential and degradation)

The substance is considered 'not rapidly degradable'. The stability of the Tetraphosphorus trisulphide to hydrolysis was investigated according to OECD TG 111 (Nebuloni M, 2017) concluding that the substance is stable to hydrolysis at room temperature in acid, neutral and basic conditions. Furthermore, the only available data, indicating a low potential for bioaccumulation, is a calculated LogKow of -0.23, even though inorganic salts are out of the applicability domain.

For the substance only unbounded LC50 and EC50 values are present, therefore the surrogate approach cannot be used to derive fish and invertebrate chronic classification from acute data. Only algae NOEC value of 2.5 mg/L is thus used for classification purposes.

In conclusion, considering that the substance is not readily biodegradable and the LogKow is  $\leq 4$  and the NOEC is 2.5 mg/L, no classification for Aquatic toxicity is suggested.

### 11.8 CONCLUSION ON CLASSIFICATION AND LABELLING FOR ENVIRONMENTAL HAZARDS

The acute toxicity data suggest that the substance should not be classified in Aquatic Acute 1 as the  $LC_{50}$  for fish and the  $EC_{50}$  for crustacea and algae is above 1 mg/L. The substance does not fulfil the criteria for environmental hazards according to CLP Regulation. Aquatic Acute 1, should be removed.

Regarding chronic aquatic hazard, tetraphosphorus trisulphide is considered not rapidly degradable with a low potential for bioaccumulation in the aquatic environment. Chronic toxicity data is available for algae only and the surrogate approach cannot be applied because of unbounded L/EC50 values; the long-term toxicity NOEC is > 2.5 mg/L, therefore no chronic aquatic classification is proposed.

Based on the above results, it is suggested that tetraphosphorus trisulphide should not be assigned any classification for environment. Thus, it is suggested that the substance is declassified in relation to the current environmental classification.

#### 12 EVALUATION OF ADDITIONAL HAZARDS

12.1 Hazardous to the ozone layer

No additional hazards were evaluated in this dossier.

#### 13 ADDITIONAL LABELLING

None.

#### 14 REFERENCES

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.

Council Directive 67/548/EEC of 27 June 1967 on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances.

Leonardi M and Zucchelli U, Internal test report: Relative density, melting point, boiling point and flammability of P4S3, 2017.

Younis S, Final report: Flammability Testing on a Sample of Phosphorus Sesquisulphide P<sub>4</sub>S<sub>3</sub>, 2020.

Nebuloni M., Study report: Degradation of P<sub>4</sub>S<sub>3</sub> (phosphorus sesquisulphide): Hydrolysis in function to the pH (OECD/OCDE 111 directives). Testing laboratory: Redox S.r.l. Report number: 779/17, Owner company: Italmatch Chemicals SpA, Report date: Nov 30, 2017.

Phosphorus sesquisulphide 96-hour Acute Toxicity to *Danio rerio* (Zebrafish) OECD 203 Commission Regulation (EC) No 440/2008. C.1. (study report), Report no: A17-01588. Owner company; Italmatch Chemicals SpA, Report date: Nov 9, 2017.

Phosphorus sesquisulphide - 48-hour Acute Toxicity to *Daphnia magna* OECD 202, Commission Regulation (EC) No 440/2008. C.2. (study report), Report no: A17-01062. Owner company; Italmatch Chemicals SpA, Report date: Nov 3, 2017.

Phosphorus sesquisulphide - Fresh water algal growth inhibition test with *Desmodesmus subspicatus* OECD 201, Commission Regulation (EC) No 761/2009. C.3. (study report), Report no: A17-01061. Owner company; Italmatch Chemicals SpA, Report date: Nov 3, 2017.

Tetraphosphorus Trisulfide - Test for inhibition of oxygen consumption by activated sludge: Respiration Inhibition Test, Arcadis Schweiz LTD, Ifangstrasse 11, CH-8952 Schlieren.

#### 15 ANNEXES

The study summaries of the original study reports mentioned in the sections above, including details and results, are available in the Annex I to the CLH report.