

## COMMENTS AND RESPONSE TO COMMENTS ON CLH: PROPOSAL AND JUSTIFICATION

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**Last data extracted on 28.10.2019**

**Substance name: 2,4,6-triisopropyl-m-phenylene diisocyanate**

**CAS number: 2162-73-4**

**EC number: 218-485-4**

**Dossier submitter: Germany**

### RESPIRATORY SENSITISATION

Date	Country	Organisation	Type of Organisation	Comment number
24.10.2019	Sweden		MemberState	1
Comment received				
<p>As stated in section 3.4.2.1 of Annex I to the CLP Regulation, classification for respiratory sensitisation is typically based on human data with supportive evidence from e.g. animal data. No such substance specific data is available for TRIDI and although the CLP criteria cannot directly be applied, the Swedish CA supports the WoE approach taken by the DS. Hence, classification of TRIDI as Resp. Sens. 1, H334 is supported based on;</p> <p>1) the general mechanistic knowledge on the biological effects of diisocyanates. For example, the (di)isocyanate structure is an alert for respiratory sensitisation (REACH guidance on IR/CSA, Table R.7.3-3, and OECD QSAR toolbox v.4.3), and</p> <p>2) read-across of human and non-human respiratory data from structurally similar diisocyanates HDI, MDI and TDI. All three source substances have harmonised classifications as Resp Sens. 1.</p> <p>In addition the Swedish CA finds that the molecular size (285 Da) and volatility (although quite low, i.e. 0.19 Pa) do not contradict that respiratory uptake of TRIDI occurs.</p>				

Date	Country	Organisation	Type of Organisation	Comment number
25.10.2019	France		MemberState	2
Comment received				
<p>Despite the lack of data on respiratory sensitization with TRIDI, the current knowledge on hypersensitivity induced by isocyanates can allow proposing a classification for this substance.</p>				

### OTHER HAZARDS AND ENDPOINTS – Skin Sensitisation Hazard

Date	Country	Organisation	Type of Organisation	Comment number
24.10.2019	Sweden		MemberState	3
Comment received				
<p>No substance specific human or animal data on skin sensitization is available for TRIDI. However, the Swedish CA agrees with the DS that there is sufficient evidence for skin sensitization potential of TRIDI by the presence of the diisocyanate structure in combination with evidence of strong skin sensitizing properties from a number of</p>				

structural analogue diisocyanates. In addition, the molecular size of TRIDI (285 Da) indicates potential for skin absorption. Hence, the Swedish CA supports classification of TRIDI as Skin Sens. 1, H317.

Date	Country	Organisation	Type of Organisation	Comment number
25.10.2019	France		MemberState	4
Comment received				
Skin Sensitization: Despite the lack of data on skin sensitization with TRIDI, the current knowledge on hypersensitivity induced by isocyanates can allow proposing a classification for this substance.				