European Copper Institute
Copper Alliance

ECI COMMENTS TO

CLH REPORT: PROPOSAL FOR HARMONIZED CLASSIFICATION AND LABELLING OF COPPER THIOCYANATE (COPPER (I) THYOCYANATE OR CUPROUS THIOCYANATE)

These comments also reflect the considerations of the following task forces and consortium;

European Antifouling Copper Task Force

Wood Preservative Copper Task Force

The European Union Copper Task Force (Plant Protection Products Regulation [PPPR])

Copper Compound Consortium

ABSTRACT

We acknowledge and appreciate the alignment with the copper risk assessment dossier as well as the incorporation of some post risk assessment data.

For most endpoints, the data used and interpretation of the data reflect the hazard profiles agreed in the copper risk assessment report (RAR) and used for the REACH dossiers.

For the environmental endpoints, we noted some differences between the copper thiocyanate CLH report and the REACH dossier. These differences did not lead to a different classification and have not been raised for this compound.

1) INTRODUCTION

We appreciate the opportunity to review the CLH report but do regret the significant overlap between the public consultation period and the year-end holidays.

We acknowledge and appreciate the alignment between the CLH report and the copper risk assessment report (RAR) as well as the incorporation of some post risk assessment data.

For the environmental endpoints, we noted some differences between the copper thiocyanate CLH report and the REACH dossier. These differences did not lead to a different classification.

2) HUMAN HEALTH HAZARDS

No comments.

3) ENVIRONMENTAL HAZARDS

In the CLH and REACH dossier, the following classifications for environmental hazard were derived:

Acute category 1. M factor = 10.
Chronic category 2.

3.1 ECOTOXICITY DATABASE

Note: In the RAR and the REACH dossier, the ecotoxicity data from *P. promelas* at pH 6 (Erickson *et al.,* 1996) were rejected and it may be clarifying to also mention this in the CLH report.

> The test was performed with larvae (< 24 h old) in a flow-through with a very short retention time (± 45 min.), using a diluted reconstituted medium (prepared from Lake Superior water through reverse osmosis) with a low hardness (22 mg/l CaCO3) and DOC concentration (reverse osmosis) This test performed represent worst case conditions explaining therefore this low LC50 value. Moreover the observed pH dependency observed for *P. promelas* at (sensitivity at pH 6 versus pH 7) is unexpected and may be related to insufficient adaptation to low pH conditions (from Van Sprang and Delbeke, 2010 -Attachment 1).

3.2 CLASSIFICATION

The CLH and REACH dossiers consider copper thiocyanate as rapid degradable (based on evidence of rapid removal from the water column).

Copper thiocyanate has been considered fully soluble for the purposes of classification. However, for comparison purposes, the classification versus solubility for copper compounds and copper flake is presented in Attachment 2 for completeness.

Classification in both dossiers (CLH and REACH) is therefore based on straight comparison between ERV values and classification cut-off values.

- **Acute 1 - H400. M factor =10.**
- **Chronic 2 - H411.**

4) RELEVANT ATTACHMENTS

Attachment 1: Van Sprang and Delbeke, 2010

Attachment 2: Classification versus solubility of copper compounds and copper flake

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