# RISK MANAGEMENT OPTION ANALYSIS

# CONCLUSION DOCUMENT

**for**

# Copper sulphide

**EC No 215-271-2**

**CAS No 1317-40-4**

**Authority:** European Chemicals Agency at the request of the European Commission

Dated: 07 September 2015

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# Foreword

The purpose of Risk Management Option analysis (RMOA) is to help authorities decide whether further regulatory risk management activities are required for a substance and to identify the most appropriate instrument to address a concern.

RMOA is a voluntary step, i.e., it is not part of the processes as defined in the legislation. For authorities, documenting the RMOA allows the sharing of information and promoting early discussion, which helps lead to a common understanding on the action pursued. A Member State or ECHA (at the request of the Commission) can carry out this case-by-case analysis in order to conclude whether a substance is a 'relevant substance of very high concern (SVHC)' in the sense of the SVHC Roadmap to 2020[1].

An RMOA can conclude that regulatory risk management at EU level is required for a substance (e.g. harmonised classification and labelling, Candidate List inclusion, restriction, other EU legislation) or that no regulatory action is required at EU level. Any subsequent regulatory processes under the REACH Regulation include consultation of interested parties and appropriate decision making involving Member State Competent Authorities and the European Commission as defined in REACH.

This Conclusion document provides the outcome of the RMOA carried out by the author authority. In this conclusion document, the authority considers how the available information collected on the substance can be used to conclude whether regulatory risk management activities are required for a substance and which is the most appropriate instrument to address a concern. With this Conclusion document the Commission, the competent authorities of the other Member States and stakeholders are informed of the considerations of the author authority. In case the author authority proposes in this conclusion document further regulatory risk management measures, this shall not be considered initiating those other measures or processes. Since this document only reflects the views of the author authority, it does not preclude Member States or the European Commission from considering or initiating regulatory risk management measures which they deem appropriate.

[1] For more information on the SVHC Roadmap: http://echa.europa.eu/addressing-chemicals-of-concern/substances-of-potential-concern

# 1. OVERVIEW OF OTHER PROCESSES / EU LEGISLATION

There appears to be no EU legislation regulating specifically this substance, copper sulphide.

# 2. CONCLUSION OF RMOA

This conclusion is based on the REACH and CLP data as well as other available relevant information taking into account the SVHC Roadmap to 2020, where appropriate.

| **Conclusions** | **Tick box** |
|---|---|
| Need for follow up regulatory action at EU level | |
| Harmonised classification and labelling | |
| Identification as SVHC (authorisation) | |
| Restriction under REACH | |
| Other EU-wide regulatory measures | |
| Need for action other than EU regulatory action | |
| No action needed at this time | √ |

# 3. NO ACTION NEEDED AT THIS TIME

Copper sulphide was selected for RMOA as according to REACH registration data the substance, as used in the EU, could contain an impurity with SVHC properties. Therefore, copper sulphide potentially fulfilled the Article 57 criteria where the concentration limit of the impurity exceeded the generic concentration limit relevant for classification as a CMR category 1A/1B. In addition, the substance is registered for uses within the scope of authorisation (i.e. use in processing aids; use in lubricants, greases and release products; and use in the production of brakepads).

However, following listing of the substance in PACT, an update of the registration data indicated that the substance copper sulphide, as used in the EU, does not contain the suspected impurity which caused the substance to be selected for RMOA. Therefore, it is concluded that no action on this substance is needed at this time. Substances, such as copper sulphide, for which the conclusion is that there is no current need for action under the Roadmap, will be revisited in the relevant re-screening activity to consider any new information.