

**Committee for Risk Assessment
(RAC)**

Opinion

Pursuant to Article 77(3)(c) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

M-factors for long-term aquatic hazard for the copper substances listed in Commission Regulation (EU) 2016/1179

ECHA/RAC/XXXXXXXXXX

Date of revision

first draft

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OPINION OF THE COMMITTEE FOR RISK ASSESSMENT

ON THE M-FACTORS FOR LONG-TERM AQUATIC HAZARD FOR THE COPPER SUBSTANCES LISTED IN COMMISSION REGULATION (EU) 2016/1179

Pursuant to Article 77(3)(c) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (the REACH Regulation), the Committee for Risk Assessment (RAC) has adopted an opinion on the M-factors for long-term aquatic hazard for the copper substances listed in Commission Regulation (EU) 2016/1179.

I PROCESS FOR ADOPTION OF THE OPINION

Following a request from the European Commission on 8 October 2018, the Executive Director of ECHA in the mandate of 12 October 2018¹, requested RAC to prepare an opinion concluding on the M-factors for long-term aquatic hazard for the copper substances listed in Commission Regulation (EU) 2016/1179 within 8 months since receipt of the request.

Rapporteur, appointed by RAC: **Steve DUNGEY**

Co-rapporteur, appointed by RAC: **Katalin GRUIZ**

The draft opinion was made publicly available for targeted public consultation at <http://echa.europa.eu/xxx> on xx/01/2019. Concerned parties and Member State Competent Authorities (MSCA) were invited to submit comments and contributions by xx/xx/xxx.

The RAC opinion was adopted on [XX XXXXX 20xx].

The RAC opinion was adopted by [consensus/majority of all members present and having the right to vote].

II OPINION OF RAC

RAC opinions for ten copper-containing substances were adopted in December 2014. The ecotoxicologically relevant moiety is the copper (II) cation, which is released from all the copper compounds. The surrogate approach was used for the aquatic chronic classifications due to uncertainties in the completeness of the chronic data set for fish.

The copper ecotoxicity dataset was subsequently updated for granulated copper, and a RAC opinion for that substance was adopted in June 2018. The chronic M-factors for the ten copper compounds have therefore been re-assessed using the

¹ <https://echa.europa.eu/documents/xxx>

revised chronic ecotoxicological reference values (ERVs) from the updated dataset. The chronic M-factor remains the same for six substances, and has reduced by a factor of 10 for four substances.

III SCIENTIFIC GROUNDS FOR THE OPINION

Based on current assessment approaches, copper (II) ions are not considered to be subject to rapid environmental transformation for the purposes of classification and labelling.

The bioaccumulation behaviour of copper (II) ions is complicated by essentiality and homeostatic mechanisms in organisms, but does not need to be considered further because it does not influence the determination of the chronic M-factor (in view of the degradability conclusion).

Chronic ERVs for copper (II) cations are presented in Table 1. Further details of the underlying data can be found in the RAC opinion for the classification of granulated copper.

Table 1. Chronic ERVs for the copper (II) cation (EC₁₀/NOEC) (µg/L)

pH band		
5.51-6.5 (acidic)	>6.5-7.5 (neutral)	>7.5-8.5 (alkaline)
Values not normalised for DOC level		
13.2 <i>(Daphnia magna)</i>	4 <i>(Ceriodaphnia dubia)</i>	12.6 <i>(D. magna)</i>
Values normalised to a DOC level of 2 mg/L		
10.5 <i>(D. magna)</i>	6.2 <i>(C. dubia)</i>	11.8 <i>(C. dubia)</i>

Copper is a data rich substance, but the data aggregation exercise results in some unexpected and potentially misleading trends. This could be an artefact of the varying amounts of data available across the pH bands and between the acute and chronic data sets. There are still potential information gaps for fish which suggest that the chronic ERVs at acidic pH could be lower than 10 µg/L. This is discussed further in the RAC opinion for granulated copper. In the absence of standard studies that have been specifically designed to investigate pH variation under specific DOC and hardness conditions in a single laboratory, the derived ERVs have to be used. The lowest ERV is for neutral conditions (4 or 6.2 µg/L, depending on DOC normalization).

The impact of these ERVs on the chronic classification of nine of the ten copper compounds is presented in Table 2. These are all considered readily water soluble, so the chronic ERV for each substance has to be calculated from the lowest ERV for the dissolved metal (0.004 mg/L) based on the following formula:

$$\frac{\text{chronic ERV of metal ion} \times \text{molecular weight of the metal compound}}{\text{atomic weight of the metal [63.55]} \times \text{number of metal ions}}$$

The tenth substance is copper flakes (coated with aliphatic acid) (index no. 029-019-01-X; EC no. 231-159-6; CAS no. 7440-50-8). This is a form of copper metal, since the aliphatic acid is not chemically bound to the flakes and is not considered to

contribute to their ecotoxicity. Consistent with the approach taken in the original opinion, transformation/dissolution protocol (T/Dp) data need to be taken into account. The release of copper ions after 28 days at a notional loading of 0.1 mg/L (extrapolated from a study using a 1 mg/L loading) was 0.077 mg dissolved Cu/L at pH 6 and 0.064 mg dissolved Cu/L at pH 7 (the concentration at a loading of 1 mg/L is ten times higher; further details can be found in the previous RAC opinion). No T/Dp data are available at pH 8. These concentrations exceed the lowest chronic ERV of the dissolved form at the same pH, confirming classification as Aquatic Chronic 1 for a non-rapidly degradable substance.

The CLP guidance (Annex IV.5.4) recommends that the M-factor is obtained from the following ratio:

$$\frac{\text{Soluble metal ion concentration at a loading of 1 mg/L from a 28-d T/Dp test}}{\text{Chronic ERV}}$$

However, there is also one classification example in the metals annex of the guidance (example B), which uses the loading of 0.1 mg/L, and this approach was used in the previous RAC opinion for this substance. RAC notes this inconsistency and recommends that the guidance is clarified on this point.

Since the dissolved metal concentration is higher at acidic pH but the chronic ERV is lowest at neutral pH, RAC has considered both pH bands in Table 2.

Table 2. Chronic M-factor for copper flakes at acidic and neutral pH

pH band	Soluble metal ion concentration from 28-d T/Dp test, µg/L	Chronic ERV, µg/L	Ratio	Chronic M-factor
T/Dp loading of 1 mg/L				
Acid	773	10.5 or 13.2	74 or 58	10
Neutral	639	4 or 6.2	160 or 103	100
T/Dp loading of 0.1 mg/L				
Acid	77	10.5 or 13.2	7 or 6	1
Neutral	64	4 or 6.2	16 or 10	10

The highest chronic M-factor is obtained at neutral pH. Clearly, the choice of loading rate makes a difference by a factor of 10. RAC considers that a chronic M-factor of xx is appropriate because..... [To be concluded after public consultation]

N.B. Classification of metals may distinguish between massive and powder forms under some circumstances, but further sub-divisions are not anticipated. This issue also arose during the RAC discussion of granulated copper. Since this is a policy rather than a scientific issue, RAC is not in a position to comment further.

Table 2: Revised chronic ERVs and M-factors for nine copper compounds

Substance	Index no.	EC no.	CAS no.	Molecular weight	Number of metal ions	Substance-specific ERV (mg/L)	M-factor
Copper (II) oxide	029-016-00-6	215-269-1	1317-38-0	79.55	1	0.0050	10
Copper (I) oxide	029-002-00-X	215-270-7	1317-39-1	143.1	2	0.0045	10
Copper (II) hydroxide, copper dihydroxide	029-021-00-3	243-815-9	20427-59-2	97.56	1	0.0061	10
Copper (II) carbonate - copper (II) hydroxide (1:1)	029-020-00-8	235-113-6	12069-69-1	221.1	2	0.0070	10
Dicopper chloride trihydroxide	029-017-00-1	215-572-9	1332-65-6	213.6	2	0.0067	10
Copper thiocyanate	029-015-00-0	214-183-1	1111-67-7	121.6	1	0.0077	10
Copper sulphate pentahydrate	029-004-00-0	231-847-6	7758-98-7	249.6	1	0.0157	1
Tetracopper hexahydroxide sulphate [1], tetracopper hexahydroxide sulphate hydrate [2]	029-018-00-7	215-582-3	1333-22-8 [1] 12527-76-3 [2]	461.3	4	0.0073	10
Bordeaux mixture, reaction products of copper sulphate with calcium dihydroxide	029-022-00-9	-	8011-63-0	878.7	4	0.0138	1

Note: The same molecular weights have been used as in the original opinions (see comments therein, particularly concerning water of hydration).

ANNEX 1

C&L tables of previously agreed copper substances.

1. [Copper flakes \(coated with aliphatic acid\)](#)
2. [Copper \(II\) oxide](#)
3. [Copper \(I\) oxide](#)
4. [Copper \(II\) hydroxide, copper dihydroxide](#)
5. [Copper \(II\) carbonate -- copper \(II\) hydroxide \(1:1\)](#)
6. [Dicopper chloride trihydroxide](#)
7. [Copper thiocyanate](#)
8. [Copper sulphate pentahydrate](#)
9. [Tetracopper hexahydroxide sulphate \[1\], tetracopper hexahydroxide sulphate hydrate \[2\]](#)
10. [Bordeaux mixture, reaction products of copper sulphate with calcium dihydroxide](#)

DRAFT

1. Copper flakes (coated with aliphatic acid)

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Copper flakes (coated with aliphatic acid)** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-019-01-X	copper flakes (coated with aliphatic acid)	-	-	Acute Tox. 3 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	H331 H302 H319 H400 H410	GHS06 GHS09 Dgr	H331 H302 H319 H410		M=10	
RAC opinion	029-019-01-X	copper flakes (coated with aliphatic acid)	-	-	Retain: Acute Tox. 3 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	Retain: H331 H302 H319 H400 H410	Retain: GHS06 GHS09 Dgr	Retain: H331 H302 H319 H410		Retain: M=10 Add: M=xx	
Resulting Annex VI entry if agreed by COM	029-019-01-X	copper flakes (coated with aliphatic acid)	-	-	Acute Tox. 3 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	H331 H302 H319 H400 H410	GHS06 GHS09 Dgr	H331 H302 H319 H410			

2. Copper(II) oxide

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Copper(II) oxide** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-016-00-6	copper(II) oxide	215-269-1	1317-38-0	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=100	
RAC opinion	029-016-00-6	copper(II) oxide	215-269-1	1317-38-0	Retain: Aquatic Acute 1 Aquatic Chronic 1	Retain: H400 H410	Retain: GHS09 Wng	Retain: H410		Retain: M=100 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-016-00-6	copper(II) oxide	215-269-1	1317-38-0	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410			

3. dicopper oxide;copper (I) oxide (Cu₂O)

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **dicopper oxide;copper (I) oxide (Cu₂O)** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-002-00-X	dicopper oxide; copper (I) oxide;	215-270-7	1317-39-1	Acute Tox 4 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H332 H302 H318 H400 H410	GHS07 GHS05 GHS09 Dgr	H332 H302 H318 H410		M=100	
RAC opinion	029-002-00-X	dicopper oxide; copper (I) oxide;	215-270-7	1317-39-1	Retain: Acute Tox. 4 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	Retain: H332 H318 H400 H410	Retain: Dng GHS05 GHS09	Retain: H332 H302 H318 H410		Retain: M=100 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-002-00-X	dicopper oxide; copper (I) oxide;	215-270-7	1317-39-1	Acute Tox 4 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H332 H302 H318 H400 H410	GHS05 GHS07 GHS09 Dng	H332 H302 H318 H410			

4. Copper dihydroxide; copper(II) hydroxide

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **copper dihydroxide; copper(II) hydroxide** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-021-00-3	copper dihydroxide; copper(II) hydroxide	243-815-9	20427-59-2	Acute Tox. 2 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H330 H302 H318 H400 H410	GHS06 GHS05 GHS09 Dgr	H330 H302 H318 H410		M=10	
RAC opinion	029-021-00-3	copper dihydroxide; copper(II) hydroxide	243-815-9	20427-59-2	Retain: Acute Tox. 2 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	Retain: H330 H302 H318 H400 H410	Retain: GHS06 GHS05 GHS09 Dgr	Retain: H330 H302 H318 H410		Retain: M=10 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-021-00-3	copper dihydroxide; copper(II) hydroxide	243-815-9	20427-59-2	Acute Tox. 2 Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H330 H302 H318 H400 H410	GHS06 GHS05 GHS09 Dgr	H330 H302 H318 H410			

5. copper(II) carbonate--copper(II) hydroxide (1:1)

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **copper(II) carbonate--copper(II) hydroxide (1:1)** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-020-00-8	copper(II) carbonate--copper(II) hydroxide (1:1)	235-113-6	12069-69-1	Acute Tox. 4 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	H332 H302 H319 H400 H410	GHS07 GHS09 Wng	H332 H302 H319 H410		M=10	
RAC opinion	029-020-00-8	copper(II) carbonate--copper(II) hydroxide (1:1)	235-113-6	12069-69-1	Retain: Acute Tox. 4 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	Retain: H332 H302 H319 H400 H410	Retain: GHS07 GHS09 Wng	Retain: H332 H302 H319 H410		Retain: M=10 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-020-00-8	copper(II) carbonate--copper(II) hydroxide (1:1)	235-113-6	12069-69-1	Acute Tox. 4 Acute Tox. 4 Eye Irrit. 2 Aquatic Acute 1 Aquatic Chronic 1	H332 H302 H319 H400 H410	GHS07 GHS09 Wng	H332 H302 H319 H410			

6. Dicopper chloride trihydroxide

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Dicopper chloride trihydroxide** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-017-00-1	dicopper chloride trihydroxide	215-572-9	1332-65-6	Acute Tox. 3 Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	H301 H332 H400 H410	GHS06 GHS09 Dgr	H332 H301 H410		M = 10	
RAC opinion	029-017-00-1	dicopper chloride trihydroxide	215-572-9	1332-65-6	Retain: Acute Tox. 3 Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	Retain: H301 H332 H400 H410	Retain: GHS06 GHS09 Dgr	Retain: H301 H332 H410		Retain: M=10 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-017-00-1	dicopper chloride trihydroxide	215-572-9	1332-65-6	Acute Tox. 3 Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	H301 H332 H400 H410	GHS06 GHS09 Dgr	H301 H332 H410			

7. Copper thiocyanate

The RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Copper thiocyanate** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	615-004-00-3	salts of thiocyanic acid, with the exception of those specified elsewhere in this Annex	214-183-1	1111-67-7	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410	EUH032	M=10	
RAC opinion	029-015-00-0	copper thiocyanate	214-183-1	1111-67-7	Retain: Aquatic Acute 1 Aquatic Chronic 1	Retain: H400 H410	Retain: GHS09 Wng	Retain: H410	EUH032	Retain: M=10 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-015-00-0	copper thiocyanate	214-183-1	1111-67-7	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410	EUH032		

8. Copper sulphate pentahydrate

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **copper sulphate pentahydrate** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-004-00-0	Copper sulphate pentahydrate	231-847-6	7758-99-8	Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H302 H318 H400 H410	GHS07 GHS05 GHS09 Dgr	H302 H318 H410		M = 10	
RAC opinion	029-004-00-0	Copper sulphate pentahydrate	231-847-6	7758-99-8	Retain: Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	Retain: H302 H318 H400 H410	Retain: GHS07 GHS05 GHS09 Dgr	Retain: H302 H318 H410		Retain: M=10 Add: M=1	
Resulting Annex VI entry if agreed by COM	029-004-00-0	Copper sulphate pentahydrate	231-847-6	7758-99-8	Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H302 H318 H400 H410	GHS07 GHS05 GHS09 Dgr	H302 H318 H410			

9. Tetracopper hexahydroxide sulphate [1], tetracopper hexahydroxide sulphate hydrate [2]

The RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Tetracopper hexahydroxide sulphate and Tetracopper hexahydroxide sulphate hydrate** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-018-00-7	Tetracopper hexahydroxide sulphate [1] Tetracopper hexahydroxide sulphate hydrate [2]	215-582-3	1333-22-8 [1] 12527-76-3 [2]	Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	H302 H400 H410	GHS07 GHS09 Wng	H302 H410		M=10	
RAC opinion	029-018-00-7	Tetracopper hexahydroxide sulphate [1] Tetracopper hexahydroxide sulphate hydrate [2]	215-582-3	1333-22-8 [1] 12527-76-3 [2]	Retain: Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	Retain: H302 H400 H410	Retain: GHS07 GHS09 Wng	Retain: H302 H410		Retain: M=10 Add: M=10	
Resulting Annex VI entry if agreed by COM	029-018-00-7	Tetracopper hexahydroxide sulphate [1] Tetracopper hexahydroxide sulphate hydrate [2]	215-582-3	1333-22-8 [1] 12527-76-3 [2]	Acute Tox. 4 Aquatic Acute 1 Aquatic Chronic 1	H302 H400 H410	GHS07 GHS09 Wng	H302 H410			

10. Bordeaux mixture; Reaction products of copper sulphate with calcium dihydroxide

RAC adopted the opinion on the M-factor for long-term aquatic hazard for **Bordeaux mixture; Reaction products of copper sulphate with calcium dihydroxide** as follows:

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors	Notes
					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	029-022-00-9	Bordeaux mixture; Reaction products of copper sulphate with calcium dihydroxide	-	8011-63-0	Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H332 H318 H400 H410	GHS07 GHS05 GHS09 Dgr	H332 H318 H410		M=10	
RAC opinion	029-022-00-9	Bordeaux mixture; Reaction products of copper sulphate with calcium dihydroxide	-	8011-63-0	Retain: Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	Retain: H332 H318 H400 H410	Retain: GHS07 GHS05 GHS09 Dgr	Retain: H332 H318 H410		Retain: M=10 Add: M=1	
Resulting Annex VI entry if agreed by COM	029-022-00-9	Bordeaux mixture; Reaction products of copper sulphate with calcium dihydroxide	-	8011-63-0	Acute Tox. 4 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H332 H318 H400 H410	GHS07 GHS05 GHS09 Dgr	H332 H318 H410			