

## Justification for the selection of a candidate CoRAP substance

### – UPDATE –

<b>Substance Name (EC Name):</b>	Phenol, 4-nonyl-, branched
<b>Chemical Group:</b>	Organic
<b>EC Number:</b>	284-325-5
<b>CAS Number:</b>	84852-15-3
<b>Submitted by:</b>	UK CA
<b>Published:</b>	20/03/2013 Update 26/03/2014

#### Note

This document has been prepared by the evaluating Member State given in the CoRAP update.

## Contents

1	IDENTITY OF THE SUBSTANCE	
1.1	Name and other identifiers of the substance	3
2	CLASSIFICATION AND LABELLING	
2.1	Harmonised Classification in Annex VI of the CLP	4
2.2	Proposal for Harmonised Classification in Annex VI of the CLP	4
2.3	Self classification	4
3	JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE	
3.1	Legal basis for the proposal	5
3.2	Grounds for concern	5
3.3	Information on aggregated tonnage and uses	5
3.4	Other completed/ongoing regulatory processes that may affect suitability for substance evaluation	6
3.5	Information to be requested to clarify the suspected risk	7
3.6	Potential follow-up and link to risk management	7

## 1 IDENTITY OF THE SUBSTANCE

### 1.1 Name and other identifiers of the substance

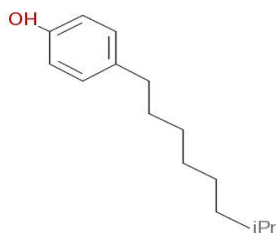
Table 1: Substance identity

<b>Public Name:</b>	Phenol, 4-nonyl-, branched
<b>EC number:</b>	284-325-5
<b>EC name:</b>	Phenol, 4-nonyl-, branched
<b>CAS number (in the EC inventory):</b>	84852-15-3
<b>CAS number:</b>	84852-15-3
<b>CAS name:</b>	Phenol, 4-nonyl-, branched
<b>IUPAC name:</b>	
<b>Index number in Annex VI of the CLP Regulation</b>	601-053-00-8
<b>Molecular formula:</b>	C <sub>15</sub> H <sub>24</sub> O
<b>Molecular weight or molecular weight range:</b>	220.3505
<b>Synonyms:</b>	p-nonylphenol Nonylphenol Isononylphenol Trade names: PNP, O03053, NONPH-NONYLPHENOL

**Type of substance**     Mono-constituent     Multi-constituent\*     UVCB

\* Commercially produced nonylphenols are predominantly 4-nonylphenol isomers having a varied and undefined degree of branching in the alkyl group. Some registrations have been made as UVCB.

**Structural formula:**



## 2 CLASSIFICATION AND LABELLING

### 2.1 Harmonised Classification in Annex VI of the CLP

Index number: 601-053-00-8 (includes nonylphenol)

CLP:

Repr. 2; H361fd: Suspected of damaging fertility. Suspected of damaging the unborn child

Acute Tox. 4 \*; H302: Harmful if swallowed

Skin Corr. 1B; H314: Causes severe skin burns and eye damage

Aquatic Acute 1; H400: Very toxic to aquatic life

Aquatic Chronic 1; H410: Very toxic to aquatic life with long lasting effects

DSD:

Repr. Cat. 3; R62-63; Possible risk of impaired fertility. Possible risk of harm to the unborn child.

Xn; R22; Harmful if swallowed.

C; R34; Causes burns.

N; R50-53; Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.

### 2.2 Proposal for Harmonised Classification in Annex VI of the CLP

None.

### 2.3 Self classification

The classifications given in the registrations and notified to the C&L Inventory are essentially the same as the harmonised one. Additional classification is made for:

M-factor=10 for Aquatic Acute 1

and

Eye Dam. 1; H318: Causes serious eye damage.

A number of notifications in the Classification and labelling inventory also include the following classification:

Eye dam. 1; H318: Causes serious eye damage

M-factor=10 for Aquatic Acute and Chronic 1

"Not Classified" is given in one notification.

### 3 JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE

#### 3.1 Legal basis for the proposal

- Article 44(2) (refined prioritisation criteria for substance evaluation)
- Article 45(5) (Member State priority)

#### 3.2 Grounds for concern

<input type="checkbox"/> Suspected CMR	<input checked="" type="checkbox"/> Wide dispersive use	<input type="checkbox"/> Cumulative exposure
<input type="checkbox"/> Sensitiser	<input checked="" type="checkbox"/> Consumer use	<input type="checkbox"/> High RCR
<input checked="" type="checkbox"/> Suspected PBT	<input type="checkbox"/> Exposure of sensitive populations	<input checked="" type="checkbox"/> Aggregated tonnage
<input type="checkbox"/> Suspected endocrine disruptor	<input type="checkbox"/> Other (provide further details below)	

Environment:

Nonylphenol is a known endocrine disruptor. The substance is a priority hazardous substance under the Water Framework Directive (WFD) and is already subject to specific restrictions in its marketing and use under REACH. The WFD requires that all NP emissions and discharges to water are eliminated. However monitoring data indicates that NP continues to be emitted to UK rivers. This suggests that either current risk management measures are insufficient or that there are sources of NP that are not adequately considered in the current registrations.

Substance evaluation would be used to assess the registrant's exposure assessment to check whether all potential uses are adequately addressed and quantified, especially in comparison with available monitoring data. Projections of emission reduction arising from the proposed restriction of nonylphenol ethoxylates in textiles would also be considered.

Previous assessment work by the UK indicates that substance evaluation could consider confirmation of background concentrations through monitoring, further elaboration of sources into the environment and the basis for the aquatic PNEC could be verified (a species sensitivity distribution approach may now be possible).

According to the previous ESR assessment commercial nonylphenol contains 2,4 dinonylphenol (EC no. 284-323-4) as an impurity. That substance was predicted to screen as PBT (PBT list no. 103), so the significance of this will be considered as part of the evaluation.

#### 3.3 Information on aggregated tonnage and uses

<input type="checkbox"/> 1 – 10 tpa	<input type="checkbox"/> 10 – 100 tpa	<input type="checkbox"/> 100 – 1000 tpa
<input type="checkbox"/> 1000 – 10,000 tpa	<input checked="" type="checkbox"/> 10,000 – 100,000 tpa	
<input type="checkbox"/> 100,000 – 1000,000 tpa	<input type="checkbox"/> > 1000,000 tpa	
<input type="checkbox"/> Confidential		

JUSTIFICATION DOCUMENT FOR THE SELECTION OF A CORAP SUBSTANCE

<input checked="" type="checkbox"/> Industrial use	<input checked="" type="checkbox"/> Professional use	<input checked="" type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System
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Industrial uses:

Manufacture and application of coatings or inks  
 Application of tackifier in manufacture of tyres and rubber products  
 Formulation of adhesives and paints  
 Industrial end-use of paints and adhesives  
 Use as a monomer in production of polymers  
 Use as an intermediate – production of ethoxylates, Phenolic oximes, TNPP  
 Use as an intermediate - Plastic Stabiliser Production  
 Use of ethoxylate in emulsion polymerization

Professional uses:

Coatings and inks application  
 Use of adhesives, outdoor & indoor

Consumer uses:

Use of adhesives  
 Use of coatings and paints

**3.4 Other completed/ongoing regulatory processes that may affect suitability for substance evaluation**

<input type="checkbox"/> Compliance check final decision	<input type="checkbox"/> Dangerous substances Directive 67/548/EEC
<input type="checkbox"/> Testing proposal	<input checked="" type="checkbox"/> Existing Substances Regulation 793/93/EEC
<input checked="" type="checkbox"/> Annex VI (CLP)	<input type="checkbox"/> Plant Protection Products Regulation 91/414/EEC
<input checked="" type="checkbox"/> Annex XV (SVHC)	<input type="checkbox"/> Biocidal Products Directive 98/8/EEC
<input type="checkbox"/> Annex XIV (Authorisation)	<input type="checkbox"/> Other (provide further details below)
<input checked="" type="checkbox"/> Annex XVII (Restriction)	

**Annex VI (CLP)** see 2.1

**Existing Substances Regulation** – Completed (Final RA Report 2002)

**Annex XV (SVHC)** – Completed: The substance has been agreed by the MSC as an SVHC due to endocrine disrupting properties in fish.

**Annex XVII (Restriction)** – Completed - There is a current restriction (Annex XVII entry 46) on certain uses of nonylphenol & nonylphenol ethoxylates.

Ongoing - In August 2013 Sweden re-submitted a dossier proposing additional restrictions.

### 3.5 Information to be requested to clarify the suspected risk

<input checked="" type="checkbox"/> Information on toxicological properties	<input type="checkbox"/> Information on physico-chemical properties
<input type="checkbox"/> Information on fate and behaviour	<input checked="" type="checkbox"/> Information on exposure
<input type="checkbox"/> Information on ecotoxicological properties	<input type="checkbox"/> Information on uses
<input type="checkbox"/> Other (provide further details below)	
<p>The following may be needed;</p> <p>Further clarification on how exposure estimates were derived including scaling. Additional information from downstream users about environmental exposure from substances manufactured from nonylphenol. Confirmation of background concentrations through monitoring, further elaboration of sources into the environment and the basis for the aquatic PNEC could be verified (a species sensitivity distribution approach may now be possible).</p>	

### 3.6 Potential follow-up and link to risk management

<input type="checkbox"/> Restriction	<input type="checkbox"/> Harmonised C&L	<input type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
<p>This will depend on the outcome of the evaluation.</p>			