

COMMENTS ON AN ANNEX XV DOSSIER FOR IDENTIFICATION OF A SUBSTANCE AS SVHC AND RESPONSES TO THESE COMMENTS

Substance name: 2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327)

CAS number: 3864-99-1

EC number: 223-383-8

The substance is proposed to be identified as meeting the following SVHC criteria set out in Article 57 of the REACH

Regulation: vPvB (Article 57 e)

***Disclaimer:** Comments provided during public consultation are made available as submitted by the commenting parties. It was in the commenting parties own responsibility to ensure that their comments do not contain confidential information. The Response to Comments table has been prepared by the competent authority of the Member State preparing the proposal for identification of a substance of very high concern.*

PART I: Comments and responses to comments on the SVHC proposal and its justification

General comments on the SVHC proposal

None

Specific comments on the justification

Number / Date	Submitted by (name, submitter type, country)	Comment	Response
4496 2015/10/12	Sweden, Member State	The Swedish CA agrees that 2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327) meets the criteria according to Article 57(e) in REACH and is thus eligible for identification as a substance of very high concern.	Thank you for your support.

4499 2015/10/12	Norway, Member State	<p>The Norwegian CA supports the proposal to identify 2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327) as a substance of very high concern because of its vPvB properties and should be included in the Candidate List.</p> <p>Concerning monitoring data a screening report from Norway has been published, which includes findings of several UV filters in the environment (benzotriazoles UV 327 and the very similar substances 328 and 329). http://www.miljodirektoratet.no/Documents/publikasjoner/M176/M176.pdf UV-327 was shown to accumulate in marine and freshwater sediments receiving treated wastewater. Further, the results show the occurrence of UV-237 in selected biota samples (prawn, cod) in the Oslo fjord, supporting these substances' potential to bioaccumulate in organisms. These results may be useful supporting information proving the persistency and bioaccumulative properties of the substances.</p>	Thank you for the support, the information from the study is already included in Annex I.E of the support document.
4521 2015/10/14	Finland, Member State	<p>2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327) (EC 223-383-8)</p> <p>The Finnish CA supports the proposal to identify the substance as a SVHC according to Article 57 (e) of the REACH regulation (EC) 1907/2006.</p> <p>The conclusion on vP is based on the results of an OECD 308 (transformation in aquatic sediment systems) test on the substance UV-327 itself, read across to structurally similar substances M1, UV-320, UV-328, UV-350 and, in addition field and monitoring studies. Based on the available information UV-327 fulfils the B (BCF >2000) and vB criterion (BCF >5000) as defined in Sections 1.1.2 and 1.2.2 of REACH Annex XIII.</p> <p>The read across substances UV-320 and UV-328 have been identified as SVHC due to their PBT/vPvB properties according to Article 57 (d) and (e) and therefore have already been included in the candidate list for Authorisation in 2014.</p> <p>Based on the information available, and acknowledging the uncertainties documented in the proposal, it seems possible to conclude that the substance fulfils the vP and vB criteria in Annex XIII to the Regulation.</p> <p>The Finnish CA notes that a Risk Management Option Analysis (RMO)</p>	<p>Thank you for your support and the assessment of the dossier.</p> <p>We agree to your rationale that the outcome of the risk management option analysis on the most appropriate measure might be reviewed in case new information on the substance becomes available after inclusion on the Candidate List.</p>

		<p>Conclusion Document on substance EC 223-383-8 has been published on the ECHA website. The RMOA conclusion was compiled on the basis of available information and may change in the light of new information or further assessment.</p> <p>The Finnish CA considers that after inclusion of the substance in the candidate list (for eventual inclusion in the Annex XIV) it can still be further explored which risk management measures would be the most appropriate.</p>	
		-	
4545 2015/10/15	CHEM Trust, National NGO, United Kingdom	CHEM Trust supports inclusion of 2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV 327) in the REACH candidate list based on its vPvB properties. The weight of evidence approach was presented in a convincing way according to the relevant parts of REACH Annex XIII.	Thank you for your support.
4552 2015/10/15	ChemSec, International NGO, Sweden	ChemSec supports the identification of UV-327 as an SVHC based on its vPvB properties. The properties have been well demonstrated in the dossier, including field data, experimental data and read-across.	Thank you for your support.
4571 2015/10/15	Health and Environment Alliance (HEAL), International NGO, Belgium	We support the nomination of UV 327 to the Candidate List	Thank you for your support.

PART II: Comments and responses to comments on uses, exposures, alternatives and risks

Specific comments on use, exposure, alternatives and risks

None