

Comments on dossiers proposing harmonised classification and labelling of substances:

1,3-dichloropropene [1], (Z)-1,3-dichloropropene [2]; (E)-1,3-dichloropropene [3]

CAS No.: 542-75-6 [1]; 10061-01-5 [2]; 10061-02-6 [3]

Physical hazards

Chapter	Issue	Comment
8.15.3	Corrosive to metals	As outlined, 1,3-D is deemed not corrosive based on years of experience in handling, storage, and packing, thus confirming no corrosive properties. 8.15.3 should therefore be updated to "1,3-D is not classified as corrosive to metals".
-	-	The commenting party agrees with the proposed classification for physical hazards.

Acute Toxicity

Chapter	Issue	Comment
10.1.2	Conclusion on classification and labelling for acute oral toxicity	The commenting party agrees with the proposed classification for acute oral toxicity based on the available in vivo studies.
10.2.3	Conclusion on classification and labelling for acute dermal toxicity	The commenting party agrees with the proposed classification for acute dermal toxicity based on the available in vivo studies.
10.3.3	Conclusion on classification and labelling for acute inhalation toxicity	The commenting party agrees with the proposed classification for acute inhalation toxicity based on the available in vivo studies.

Skin corrosion/irritation

Chapter	Issue	Comment
10.4.3	Conclusion on classification and labelling for skin corrosion/irritation	The commenting party agrees with the proposed classification for skin irritation as it reflects the results from various in vitro studies.

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Serious eye damage/ eye irritation

Chapter	Issue	Comment
10.5.3	Conclusion on classification and labelling for serious eye damage/eye irritation	The commenting party agrees with the proposed classification for eye irritation as the proposed classification reflects the results from various in vivo and in vitro studies. In addition, the different effects of the Isomers are reflected sufficiently.

Skin sensitisation

Chapter	Issue	Comment
10.7.3	Conclusion on classification and labelling for skin sensitisation	The commenting party agrees to the proposed classification as it reflects the consistent findings from various animal studies.

Mutagenicity

Chapter	Issue	Comment
10.8.3	Conclusion on classification and labelling for germ cell mutagenicity	The commenting party agrees with the proposal that the available data do not warrant a classification for mutagenicity.

Carcinogenicity

Chapter	Issue	Comment
10.9	Carcinogenicity	Please note that the studies listed under Anonymous 53, 1998 and Anonymous 52, 1997 are property of Kanesho Soil Treatment.
10.9.3	Conclusion on Classification and labelling for carcinogenicity	The commenting party agrees with the proposal to not classify for carcinogenicity as the results do not warrant classification.

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Specific target organ toxicity

Chapter	Issue	Comment
10.11.3	Conclusion on classification and labelling for STOT SE	The commenting party agrees with the classification for STOT SE as this sufficiently characterizes the effects observed after exposure to 1,3-dichloropropene.
10.12.2	Conclusion on classification and labelling for STOT RE	The commenting party agrees with the classification for STOT RE only via oral exposure as the effects via inhalation are sufficiently considered with the available classifications on STOT SE.

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Hazardous to the aquatic environment

Chapter	Issue	Comment
11.1, Table 83 11.1.3	Hydrolysis of cis- and trans-1,3-dichloropropene	DT50 values calculated to 25 °C indicate increasing tendency for hydrolysis with the pH value for cis-1,3-dichloropropene. This fact should be listed.
11.1 Table 83	Hydrolysis of the metabolites 3-chloroallyl alcohol and 3-chloroacrylic acid at pH 5,7 and 9 as well as in two natural water systems	According to DAR, cis- and trans-species have been tested to assess potential influence of the geometry of the double-bond. In the CLH-report, this should be stated accordingly.
11.1, Table 83 11.1.4.3	Water, water-sediment and soil degradation data: Water-sediment study	Beside minor degradation to 3-chloroallyl alcohol and 3-chloroacrylic acid, 1,3-dichloropropene was found also in volatile traps. The dissipation mechanism includes, beside degradation to minor metabolites and mineralization to CO ₂ , also the dissipation by volatilisation from aquatic sediment systems.
11.4.1	Estimated bioaccumulation	Mechanisms of degradation and dissipation are metabolism, hydrolysis and volatilisation.
11.5	Aquatic hazards	While 3-chloroallyl alcohol shows comparable acute toxicity to fish, metabolite 3-chloroacrylic acid is significantly less toxic (96-hrs LC ₅₀ ~ 70 mg/L), see Table 85. This should be stated here accordingly.
Table 92	Summary of acute toxicity to fish endpoints	For assessing the acute toxicity of an active ingredient, the <i>rainbow trout</i> is the species of interest. As 1,3-D consists of two diastereomers (cis and trans) with defined specification, the endpoint of study "Anonymous 91 (2001)" of 2.78 mg/L should be considered for classification.
11.7.1	Acute aquatic hazard	While it is apparent that aquatic invertebrates are most sensitive to 1,3-dichloropropene, and an aquatic acute toxicity cat. 1 is justified, it is pointed out that the <i>rainbow trout</i> is the representative fish-species to be considered for the acute hazard.
-	-	The commenting party agrees to the proposed classification for hazards to the aquatic environment.

Hazardous for the ozone layer

Chapter	Issue	Comment
-	-	The commenting party agrees to 1,3-dichloropropene not being classified as hazardous to the ozone layer.