Assessment of regulatory needs

Authority: European Chemical Agency

Date: 28/01/2020

Group Name: Benzoates

General structure: -

Revision history

Version	*Date*	*Description*
1.0	28 January 2020	

Substances within this group:

EC/List number	CAS number	Substance name [and/ or] Substance name acronyms (*)	Registration type (full, OSII or TII, NONS), highest tonnage band among all the registrations (t/y) [1]
200-618-2	65-85-0	benzoic acid	Full, >1000
202-259-7	93-58-3	methyl benzoate	Full, 100-1000
202-284-3	93-89-0	ethyl benzoate	Full, 10-100
202-334-4	94-46-2	isopentyl benzoate	Full, not (publicly) available
202-336-5	94-47-3	phenethyl benzoate	Full, 10-100
204-401-3	120-50-3	Isobutyl benzoate	C&L notifications
204-402-9	120-51-4	benzyl benzoate	Full, 100-1000
205-252-7	136-60-7	butyl benzoate	Full, not (publicly) available
208-534-8	532-32-1	sodium benzoate	Full, 1000
209-481-3	582-25-2	potassium benzoate	Full, 10-100
212-214-3	769-78-8	vinyl benzoate	Full, not (publicly) available
213-361-6	939-48-0	isopropyl benzoate	Full, 10-100
218-235-4	2090-05-3	calcium dibenzoate	Full, 10-100
219-020-8	2315-68-6	Propyl benzoate	C&L notifications
226-254-4	5335-05-7	chloromethyl benzoate	Intermediate (OSII or TII)
226-641-8	5444-75-7	2-ethylhexyl benzoate	Full, 100-1000
226-685-8	5451-76-3	2-butoxyethyl benzoate	Full, not (publicly) available
229-856-5	6789-88-4	hexyl benzoate	Full, not (publicly) available
234-169-9	10578-34-4	Octadecyl benzoate	C&L notifications
246-669-4	25152-85-6	(Z)-hex-3-enyl benzoate	Full, 1-10
270-112-4	68411-27-8	Benzoic acid, C12-15-alkyl esters	Full, >1000
421-090-1	131298-44-7	Benzoic acid, C9-11 , C10-rich, branched alkyl esters	Full, not (publicly) available
447-010-5	670241-72-2	Nonylbenzoate, branched and linear	Full, not (publicly) available
603-470-0	131298-44-7	benzoic acid c9-11 branched alkyl esters	C&L notifications
611-930-7	60045-26-3	3-phenylpropyl benzoate	Full, 10-100

This table contains also group members that are only notified under the CLP Regulation. However, the list is currently non-exhaustive. Should further regulatory risk management action on one or more substances in the group be considered, ECHA will make an additional search for related C&L notified substances to be included in the group and develop an assessment of regulatory needs for them.

[1] Note that the total aggregated tonnage band may be available on ECHA's webpage at https://echa.europa.eu/information-on-chemicals/registered-substances

Contents

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Foreword

The purpose of the assessment of regulatory needs of a group of substances is to help authorities conclude on the most appropriate way to address the identified concerns for a group of substances or a single substance, i.e. the combination of the regulatory risk management instruments to be used and any intermediate steps, such as data generation, needed to initiate and introduce these regulatory measures.

An assessment of regulatory needs can conclude that regulatory risk management at EU level is required for a (group of) substance(s) (e.g. harmonised classification and labelling, Candidate List inclusion, restriction, other EU legislation) or that no regulatory action is required at EU level. While the assessment is done for a group of substances, the (no) need for regulatory action can be identified for the whole group, a subgroup or for single substance(s).

The assessment of regulatory needs is an important step under ECHA's Integrated Regulatory Strategy. However, it is not part of the formal processes defined in the legislation but aims to support them.

The assessment of regulatory needs can be applied to any group of substances or single substance, i.e., any type of hazards or uses and regardless of the previous regulatory history or lack of such. It can be done based on different level of information. A Member State or ECHA can carry out this case-by-case analysis. The starting point is available information in the REACH registrations and any other REACH and CLP information. However, more extensive set of information can be available, e.g. assessment done under REACH/CLP or other EU legislation, or can be generated in some cases (e.g. further hazard information under dossier evaluation). Uncertainties associated to the level of information used should be reflected in the documentation. It will be revisited when necessary. For example, after further information is generated and the hazard has been clarified or when new insights on uses are available. It can be revisited by the same or another authority.

The responsibility for the content of this assessment rests with the authority that developed it. It is possible that other authorities do not have the same view and may develop further assessment of regulatory needs. The assessment of regulatory needs does not yet initiate any regulatory process but any authority can consequently do so and should indicate this by appropriate means, such as the Registry of Intentions.

For more information on Assessment of regulatory needs please consult ECHA website[2].

[2] https://echa.europa.eu/understanding-assessment-regulatory-needs

Glossary

CCH	Compliance Check
CLH	Harmonised classification and labelling
CMR	Carcinogenic, mutagenic and/or toxic to reproduction
DEv	Dossier evaluation
ED	Endocrine disruptor
NONS	Notified new substances
OEL	Occupational exposure limit
OSII or TII	On-site isolated intermediate or transported isolated intermediate
PBT/vPvB	Persistent, bioaccumulative and toxic/very persistent and very bioaccumulative
RMOA	Regulatory management options analysis
RRM	Regulatory risk management
SEv	Substance evaluation
STOT RE	Specific target organ toxicity, repeated exposure
SVHC	Substance of very high concern

1 Overview of the group

ECHA has grouped together structurally similar substances based on the presence of the benzoate moiety. The benzoate group was built based on the "seed" substance benzoic acid isononyl ester (EC 447-010-5). This substance was ranked as a substance with high potential for release from plastics in PLASI (plastic additives initiative)[3]. The group contains 25 substances, from which one is only registered as intermediate (TII or OSII) and four have only C&L notifications.

Based on information reported in the REACH registration dossiers, about half of the substances in the group are used as plasticisers or in polymerisation (assumed to be the same use). Other benzoates in the group are used mainly in cosmetics or washing and cleaning products, and they range from simple alcohol esters to more branched fatty alcohol esters of benzoic acid.

Note on the scope of ECHA's assessment of regulatory needs

Regarding hazards, the focus of ECHA's assessment is on CMR (carcinogenic, mutagenic and/or toxic to reproduction), sensitiser, ED (endocrine disruptor), PBT/vPvB or equivalent (e.g. substances being persistent, mobile and toxic), aquatic toxicity hazard endpoints and therefore only those are reflected in the table in section 3. This does not mean that the substances do not have other known or potential hazards. In some specific cases, where ECHA identifies a need for regulatory risk management action at EU level for other hazards (e.g. neurotoxicity, STOT RE), such additional hazards may be addressed in the assessment. An overview of classification is presented in Annex 1.

On the exposure side, ECHA is mainly using the information on uses reported in the registration dossiers (IUCLID) as a proxy for assessing the potential for exposure to humans and releases to the environment. The potential for release / exposure is generally considered high for "widespread" uses, i.e. professional and consumer uses and uses in articles. For these uses, normally happening at many places, the expected level of control is *à priori* considered limited. The chemical safety reports are not necessarily consulted and no quantitative exposure assessment is performed at this stage.

2 Justification for the need for regulatory risk management action at EU level

Based on currently available information, there is a need for (further) EU regulatory risk management – restriction combined with authorisation to address the potential Repr. 1B hazard for four substances in the group (2-ethylhexyl benzoate (EC 226-641-8), benzoic acid isononyl ester (EC 447-010-5), C9-11 branched alkyl benzoate (EC 421-090-1) and benzoic acid C12-15 alkyl esters (EC 270-112-4)).

Based on available hazard information reported in the registration dossiers, the benzoates do not appear to show potential environmental hazards (all substances

[3] https://echa.europa.eu/plastic-additives-initiative

seem to be readily biodegradable). Compliance checks will support confirming the unlikely environmental hazards.

Regarding human health, 2-ethylhexyl benzoate (EC 226-641-8), benzoic acid isononyl ester (EC 447-010-5), C9-11 branched alkyl benzoate (EC 421-090-1) and benzoic acid C12-15 alkyl esters (EC 270-112-4) have potential reproductive toxicity properties. 2-ethylhexyl benzoate is self-classified as Repr. 1B.

These substances have mostly professional and industrial uses, but some have reported consumer uses e.g. in cosmetics (EC 270-112-4, high volume, only use reported is in cosmetics), washing and cleaning products, lubricants, insecticides or repellents (see section 3 and Annex 2 for more details). Not all substances report those uses however due to similarity in structures it is expected that the substances can substitute each others.

The first step of the regulatory risk management action proposed for these substances is the confirmation of hazard via harmonised classification (CLH) as Repr. 1B.

CLH i) will require company level risk management measures (RMM) under the occupational safety and health (OSH) legislation for workers, to be in place, ii) is needed or highly recommended for further regulatory processes under REACH and iii) is a prerequisite to restrict the presence of the substances in consumer mixtures, by means of the restriction entry 30.

CLH will also support regulatory action under other regulations. For instance, in this specific case:

- harmonised classification as Repro. 1B will trigger regulatory action under the Cosmetic products regulation (EC) No 1223/2009 for uses as fragrance, since CMR cat. 1 are restricted by this regulation (EC 270-112-4 used by professionals).
- harmonised classification as Repro. 1B will trigger regulatory action under the biocidal product regulation (EU) 528/2012, which does not allow the use by the general public of a product containing substances above the concentration limit leading to classification of the mixture as CMR cat 1.

Professional use as lubricant and in washing and cleaning products is reported in the registration dossier for EC 226-641-8. Furthermore, two of the four substances are used as plasticisers and one in polymerisation and may therefore end up in articles however such information is not clearly reported in the registration dossiers. Industrial uses e.g. in formulation, washing, cleaning, lubricants, metal working fluids, coatings or polymers are also reported.

The uses by professional workers as lubricant and in washing and cleaning products are expected to be widespread (at many sites and by many users). Relatively low levels of operational controls and risk management measures are expected, with frequent exposures of a long duration. In addition, professional users may be self-employed and therefore not covered by the OSH legislation. Consumers may be co-exposed to the substances used by professionals (e.g. cosmetics in beauty salons).

Therefore, a **restriction of the substance as such or in mixtures (concentration limit in mixtures) used by professionals** is suggested after CLH. This is proposed to apply to all four substances to avoid that the others may be used as alternatives to the lubricant and cleaning and washing product use for EC 226-641-8.

Restriction of professional uses is preferred over authorisation as it is considered to be more efficient and effective to introduce controls at the level of placing on the market rather than at the level of uses.

In addition, the use of the most harmful substances by professional workers has been recognised as an area of concern under the European Commission's Chemicals Strategy for Sustainability[4] which aims to extend to professional users under REACH the level of protection granted to consumers.

Moreover, **restricting substances in articles** should be considered in the context of the restriction of professional uses (e.g. plasticiser uses).

For the time being it is also proposed that, due to similarity in the chemical structures and hazard, all four substances are considered in the restriction.

The remaining industrial uses could be addressed by authorisation to push for substitution and to ensure proper control of risks until substitution is possible. The need for authorisation to complement restriction can be considered when a restriction proposal is being developed.

An EU-wide exposure limit for workers under OSH or REACH as an alternative regulatory risk management option to authorisation was not considered adequate as the inhalation route does not seem to be the main exposure route for several industrial uses, such as uses in lubricants, metal working fluids or washing and cleaning, for which the dermal route may be more relevant.

Based on currently available information, there is a need for (further) EU regulatory risk management – harmonised classification and labelling (CLH) for the substance EC 204-402-9 due to potential skin sensitising properties and presence in articles made of textiles, leather or fur.

Benzyl benzoate (EC 204-402-9) exhibits skin sensitising properties and registrations report among others uses in the industrial manufacture of textiles, leather and fur, where it can be used as fixing or impregnation agent. Therefore, CLH is proposed to confirm the skin sensitising properties and add it to the already existing CLH entry. This is a prerequisite to subject the substance to the scope of the restriction proposal from France and Sweden on the placing on the market of textile, leather, hide and fur articles containing skin sensitising substances[5].

According to the Cosmetic Product Regulation (Regulation (EC) No. 1223/2009) the substance should not be contained in cosmetic products (Annex III, reference number 85).

Based on currently available information, there is no need for (further) EU regulatory risk management for the other substances in the group.

The properties of the substances for systemic toxicity are potentially linked to their expected metabolism with uncertainty in the absence of toxicokinetic data regarding the contribution of unbroken ester to induce systemic toxicity. For the substances that are registered at low tonnages or not registered, the conclusions at this stage are based on the potential toxicity of the expected metabolites. The assumption is for now that those substances would breakdown to metabolites without toxicity to reproduction and therefore all those substances are considered as unlikely toxic to reproduction.

[4] European Commission, *Chemical Strategy for Sustainability Towards a Toxic-Free Environment*, available at https://ec.europa.eu/environment/pdf/chemicals/2020/10/Strategy.pdf

[5] Final opinions of RAC and SEAC have been sent to COM for decision making. More details can be found at: https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e182446136

Vinyl benzoate (EC 212-214-3), isopropyl benzoate (EC 213-361-6) and (Z)-hex-3-enyl benzoate (EC 246-669-4) are self-classified as skin sens. 1. Phenethyl benzoate (EC 202-336-5) and 3-phenylpropyl benzoate (EC 611-930-7) exhibit skin sensitising properties in the experimental data reported in the registration dossiers, but do not have a self-classification. Many of these substances have professional or consumer uses.

For industrial and professional uses, sufficient and consistent self-classification by registrants should require adequate risk management measures to be in place according to workplace legislation.

Adequate product labelling should in principle provide consumers with sufficient information to manage risks arising from the use of mixtures containing the substances.

However, there is a concern related to skin sensitisers (potentially) present in consumer mixtures and the need to further investigate whether further regulatory actions are needed and what would be the best options to address this concern.

Such concern has already been identified in other groups of substances and was brought for further discussion to Member States. Work is ongoing on this generic issue by both Member States and ECHA which may affect the regulatory actions on substances in this group.

Therefore, it is proposed that there is currently no need for EU-wide regulatory risk management.

Based on ECHA's assessment of currently available hazard information, no potential human health hazards were identified for methyl benzoate (EC 202-259-7), ethyl benzoate (EC 202-284-3), isopentyl benzoate (EC 202-334-4) and butyl benzoate (EC 205-252-7). Compliance check is proposed to clarify the unlikely hazards. Sodium benzoate (EC 208-534-8), potassium benzoate (EC 209-481-3) and calcium benzoate (EC 218-235-4) are simple salts of benzoic acid. Benzoic acid had a full compliance check which resulted in no further actions identified. The existing harmonised classification as STOT RE1 is considered sufficient to ensure workers safety. Benzoic acid is mainly used by consumers in cosmetics and personal care products. According to the Cosmetic Product Regulation (Regulation (EC) No. 1223/2009) the substance is listed in the list of preservatives allowed (Annex V, reference number 1). Compliance check is proposed for the three salts to confirm the unlikely hazards.

For all other substances in the group not explicitly mentioned above, due to low tonnage, intermediate registration or substances being not registered, it is not possible to clarify the potential hazards of those substances. Therefore, it is proposed that there is currently no need for EU RRM action on these substances. If the registration status changes, data generation and potentially follow up actions will be re-considered when the assessment will be revisited.

3 Conclusions and actions

The conclusions and actions proposed in the table below are based on the REACH and CLP information available at the time of the assessment by ECHA. The main source of information is the registration dossiers. Relevant public assessments may also be considered. When new information (e.g. on hazards through evaluation processes, or on uses) will become available, the document will be updated and conclusions and actions revisited

Subgroup name, EC/List number, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Last foreseen action	Action
226-641-8 270-112-4 421-090-1 447-010-5	Known or potential hazard for reproductive toxicity	No hazard or unlikely hazard	Industrial uses e.g. in formulation, washing, cleaning, lubricants, metal working fluids, coatings or polymers. Only for 226-641-8 professional uses as lubricants and washing and cleaning products are reported. Consumer uses e.g. in cosmetics, washing and cleaning products, lubricants, insecticides or repellents (except 447-010-5). High potential for exposure from widespread professional or consumer uses or uses in polymer articles (EC 421-090-1). For 447-010-5 lower exposure potential from industrial uses only.	**Need for EU RRM: Restriction** <u>Justification:</u> The harmonised classification as Repr.1 would lead to generic restrictions of the substances in consumer mixtures by means of the restriction entry 30 The reported professional uses are widespread (at many sites and many users) with relatively low levels of operational controls and risk management measures but with often frequent exposures with a long duration. Restriction of professional uses is preferred over	**First step:** CCH CLH (except for 270-112-4 pending CCH) **Next steps (if hazard confirmed):** • CLH (for EC 270-112-4) • Restriction of uses by professional workers and in articles •

Subgroup name, EC/List number, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Last foreseen action	Action
				authorisation as it is considered to be more efficient and effective to introduce controls at the level of placing on the market rather than at the level of uses. Potential exposure from articles needs further investigation, restriction for use in articles to be considered together with the restriction of professional uses. The need to complement restriction with authorisation for industrial uses may be considered when the restriction proposal is being developed.	
204-402-9	Known or potential hazard for skin sensitisation	No hazard or unlikely hazard	Uses e.g. in manufacture of textiles, leather and fur, in washing, cleaning, cosmetics, biocides, including widespread uses by professionals and consumers and potentially	**Need for EU RRM: CLH** <u>Justification</u>: The CLH for skin sens will make the substance subject to proposed restriction of skin sensitisers in textiles	CLH

Subgroup name, EC/List number, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Last foreseen action	Action
			in textile, leather and fur articles, resulting in high potential for exposure		
202-336-5 212-214-3 213-361-6 246-669-4 611-930-7	Known or potential hazard for skin sensitisation	No hazard or unlikely hazard	Uses e.g. in washing, cleaning, lubricants, cosmetics, coatings or biocides, including widespread uses by professionals and consumers, resulting in high potential for exposure (except for 212-214-3 only used for polymerisation in industrial settings)	**Currently no need for EU RRM** Justification: Harmonised/self-classification followed by implementation of necessary RRMs should be sufficient to ensure safe use at the workplace. The concern related to the presence of skin sensitisers in consumer mixtures is under investigation.	CCH (except for 212-214-3)
202-259-7 202-284-3 202-334-4 205-252-7 208-534-8 209-481-3 218-235-4	No hazard or unlikely hazard Inconclusive for skin sensitisation for EC 202-334-4	No hazard or unlikely hazard	Uses e.g. in washing, cleaning, lubricants, cosmetics, biocides or printing, mainly including widespread uses by professionals and consumers or uses in articles resulting in high potential for exposure (except for uses as intermediate and substances not registered)	**Currently no need for EU RRM** Justification: Harmonised/self-classification followed by implementation of necessary RRMs should be sufficient to ensure safe use at the workplace. The concern related to the presence of skin sensitisers in consumer mixtures is under investigation.	CCH

Subgroup name, EC/List number, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Last foreseen action	Action
200-618-2	Known or potential hazard for STOT RE1	No hazard or unlikely hazard	Mainly used as cosmetics, personal care products by consumers. Some professional uses and industrial uses as auxiliary for polymerisation. Potential for exposure expected from the use in cosmetics and personal care products	**Currently no need for EU RRM** Justification: The harmonised classification as STOT RE followed by implementation of necessary RRMs should be sufficient to ensure safe use by workers. Allowed preservatives under the Cosmetic Product Regulation (Regulation (EC) No. 1223/2009, Annex V, reference number 1)	No action
226-254-4 (interm. reg.) 226-685-8 (1-10T) 229-856-5 (1-10T) *Not registered:* 219-020-8 204-401-3	Inconclusive hazards	Inconclusive hazards	Uses e.g. in washing, cleaning, lubricants, cosmetics, biocides or printing, mainly including widespread uses by professionals and consumers or uses in articles resulting in high potential for exposure (except for uses as intermediate and substances not registered). All substances registered at low	**Currently no need for EU RRM** Justification: Due to low tonnage, intermediate registration, substances being not registered no data generation is possible to clarify the hazards currently. Actions (including data generation) will be re-considered when the assessment will be revisited if the registration	No action

Subgroup name, EC/List number, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Last foreseen action	Action
234-169-9 603-470-0			tonnages, as intermediate or not registered therefore potential for exposure expected to be low.	status and/or uses change.	

Annex 1: Harmonised classifications and self-classifications reported by registrants

Data extracted in November 2019

EC/ List No	Substance name	Harmonised classification	Classification in registrations	Classification in C&L notifications
200-618-2	Benzoic acid	STOT RE 1 (lung, inhalation); Skin irrit. 2; Eye Dam 1;		Acute Tox. 4; STOT SE 3; Aquatic Chronic 3; STOT SE 3
202-259-7	Methyl benzoate		Acute tox 4	STOT SE 2; Skin Irrit. 2; Eye Irrit. 2; Aquatic Chronic 3; Asp. Tox. 1
202-284-3	Ethyl benzoate		Skin irrit. 2; Eye irrit. 2;	Aquatic Chronic 2
219-020-8	Propyl Benzoate			
205-252-7	Butyl benzoate			Skin Irrit. 2; Eye Irrit. 2; Acute Tox. 4 ; Skin Sens. 1; Resp. Sens. 1; STOT SE 3
218-077-6	Pentyl benzoate			Skin Irrit. 2; Eye irrit 2; Aquatic chronic 2, not classifided
229-856-5	Hexyl Benzoate		Skin irrit. 2; Eye irrit. 2; Aqua acute 1 (M-1); Aqua Chronic 1	Aquatic Chronic 2
234-169-9	Octadecyl benzoate			Skin Irrit. 2, Eye Irrit 2., Aqua Chronic 3
226-685-8	2-butoxyethyl benzoate		Acute tox 4; Aqua Acute 2; Aqua Chronic 2	Eye Irrit. 2
204-402-9	Benzyl benzoate	Acute tox 4*; Aqua Chronic 2	Aqua acute 1	Acute Tox. 2; Acute Tox. 4Aquatic Acute 1; Aquatic Chronic 3
202-336-5	phenethyl benzoate		Aquatic Chronic 2	
611-930-7	3-phenylpropyl benzoate		Aqua Acute 1; Aqua Chronic 3	
226-254-4	Chloromethyl benzoate			Acute Tox. 4; Skin Corr. 1B; Skin Sens. 1
212-214-3	Vinyl benzoate		Skin sens. 1; Aqua acute 1 (M-1); Aqua chronic 3	Flam. Liq. 4; Eye Irrit. 2; Eye Irrit. 2; STOT SE 3
246-669-4	(Z)-hex-3-enyl benzoate		Skin irrit. 2; Eye irrit. 2; Skin Sens. 1B; STOT SE 3; Aqua chronic 2	Not Classified

EC/ List No	Substance name	Harmonised classification	Classification in registrations	Classification in C&L notifications
213-361-6	isopropyl benzoate		Skin Sens. 1B;	Not Classified
202-334-4	isopentyl benzoate			Flam. Liq. 3; Not Classified
226-641-8	2-ethylhexyl benzoate		Repr. 1B;	Aquatic Chronic 4; Not Classified
447-010-5	Benzoic acid isononylester		Repr. 2; Aqua Chronic 2	Repr. 2
421-090-1	C9-11 branched alkyl benzoates			
603-470-0	benzoic acid, C9-11-branched alkyl esters			Aqua acute 1; Aqua Chronic 1, Acute Tox. 4; Skin Irrit. 2; Eye Irrit. 2; Skin Corr. 1A; Aquatic Chronic 2; Not Classified
270-112-4	Benzoic acid, C12-15-alkyl esters			H315; H319
208-534-8	Sodium benzoate		Eye irrit. 2;	Skin Sens. 1; Acute Tox. 4; Skin Irrit. 2; Eye Irrit. 2A
209-481-3	potasium benzoate		Skin irrit. 2; Eye irrit. 2; Acute tox 4; Eye Dam. 1 ;	Not Classified
218-235-4	Calcium dibenzoate		Eye Irrit. 2;	Not Classified

Annex 2: Overview of uses based on information available in registration dossiers

Data extracted in November 2019

Main types of applications structured by product or article types	226-641-8	447-010-5	421-090-1	270-112-4	202-336-5	204-402-9	212-214-3	213-361-6	246-669-4	611-930-7	202-259-7	202-284-3	202-334-4	205-252-7	208-534-8	209-481-3	218-235-4	200-618-2	226-685-8	229-856-5	226-254-4
Plasticiser		x								x					x						
Polymerisation			x				x			x		x					x	x			
Lubricant	x									x							x	x			
Agrochemicals								x		x				x	x						
Cleaning Product	x					x			x		x	x			x					x	
Intermediate					x								x					x			x
Cosmetics				x	x	x			x	x	x	x	x		x			x		x	
Solvent	x													x					x		
Printing																x					
Pyrotechnics																x					

Annex 3: Overview of completed or ongoing regulatory risk management activities

Data extracted on 7 June 2019

EC/List number	RMOA	Authorisation		Restriction	CLH	Actions not under REACH/ CLP
		Candidate list	Annex XIV	Annex XVII	Annex VI (CLP)	
200-618-2					Yes	

Note that in addition many of the substances in the benzoate group are listed in either Annex V or Annex III to the Cosmetics Regulation (Regulation (EC) no 1223/2009) and their use is restricted.