

RISK MANAGEMENT OPTIONS ANALYSIS CONCLUSION DOCUMENT

for

Acrylonitrile EC No 203-466-5 CAS No 107-13-1

Member State: Germany

Dated: 28 August 2014

Disclaimer: Please note that this RMOA conclusion was compiled on the basis of available information and may change in the light of new information or further assessment.

1. OVERVIEW OF OTHER REGULATORY PROCESSES / EU LEGISLATION

Directive/Regulation

- EU. First EC List of Priority Substances, Regulation No. 1179/94
- EU. Regulation **No. 10/2011** on plastic materials and articles intended to come into contact with food
- EU. REACH, Annex XVII, Appendix 2, Entry 28 Carcinogens: category 1B (Table 3.1)
- EU. Directive **98/24/EC** on the protection of workers from the risks related to chemical agents
- EU. Directive **2004/37/EC** on the protection of workers from the risks related to carcinogens or mutagens
- EU. Directive **92/85/EEC** on pregnant workers and workers who have recently given birth or are breastfeeding
- EU. Directive **94/33/EC** on young people at work
- EU. Directive **2010/75/EU** on Industrial Emissions (IPPC)
- EU. Regulation 1980/2000 on products not eligible for a positive Eco-Label

Non-exhaustive list of European countries that have established a limit value for acrylonitrile (taken from the Ariel database)

European country	Limit values	
Austria	TRK TWA: 2 ml/m ³ TRK TWA: 4.5 mg/m ³	TRK STEL: 8 ml/m ³ TRK STEL: 18 mg/m ³
Belgium	TWA: 2 ppm TWA: 4.4 mg/m ³	
Denmark	TWA: 2 ppm TWA: 4 mg/m ³	
Finland	8h limit: 2 ppm 8h limit: 4.4 mg/m³	15-minute limit: 4 ppm 15-minute limit. 8.8 mg/m³
France	Time weighted average (VME): 2 ppm Time weighted average (VME): 4.5 mg/m ³	Short term exposure limit: 15 ppm Short term exposure limit: 32.5 mg/m ³
Greece	TWA: 2 ppm TWA: 4.5 mg/m ³	
Iceland	TWA: 2 ppm TWA: 4.5 mg/m ³	
Ireland	TWA: 2 ppm TWA: 4.5 mg/m ³	
Italy	TWA: 2 ppm	
Norway	Threshold limit value: 2 ppm Threshold limit value: 4 mg/m³	
Portugal	8h exposure limit: 2 ppm	
Spain	8h daily exposure limit (VLA-ED): 2 ppm 8h daily exposure limit (VLA-ED): 4.4 mg/m³	
Sweden	Level limit value (NGV): 2 ppm Level limit value (NGV): 4.5 mg/m ³	Short term limit (KTV): 6 ppm Short term limit (KTV): 13 mg/m ³
Switzerland	TWA: 2 ppm TWA: 4.5 mg/m ³	
UK	TWA: 2 ppm TWA: 4.4 mg/m ³	

Further information:

EC, European Union Risk Assessment Report - Acrylonitrile. 2004. and

EC, Commission Recommendation of 29 April 2004 on the results of the risk evaluation and the risk reduction strategies for the substances: Acetonitrile... (recommendation for EU-wide OEL).

2. CONCLUSION OF RMOA

This conclusion is based on the REACH and CLP data as well as other available relevant information taking into account the SVHC Roadmap to 2020, where appropriate.

Conclusions	Tick box
Need for follow up regulatory action at EU level	X
Harmonised classification and labelling	
Identification as SVHC (authorisation)	
Restrictions	
Other EU-wide measures	X
No need for regulatory follow-up action	

3. FOLLOW-UP OF REGULATORY RISK MANAGEMENT ACTION AT EU LEVEL

3.1 Need for follow-up regulatory action at EU level

3.1.1 Harmonised classification and labelling

3.1.2 Identification as a substance of very high concern, SVHC (first step towards authorisation)

3.1.3 Restriction

3.1.4 Other Union-wide regulatory risk management measures

Introduction of a Europe-wide OEL would help to reach a similar level of protection for all EU countries. The national limits currently in use (Table above), are all very similar, so establishment of an community wide OEL of 2ppm (4.5 mg/m³) should be easy to attain. However, according to the knowledge of the aMSCA no such action is planned now. The aMSCA urges to fully implement the community wide occupational exposure limit already proposed by the European Commission in 2004.

4. CURRENTLY NO FOLLOW-UP FORESEEN AT EU LEVEL