

Justification for the selection of a candidate CoRAP substance

Substance Name (Public Name):	Phenol, dodecyl-, sulfurized, carbonates, calcium salts, overbased
Chemical Group:	
EC Number:	272-234-3
CAS Number:	68784-26-9
Submitted by:	NL-CA
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NOTE

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

Contents

1	IDENTITY OF THE SUBSTANCE	3
1.1	Name and other identifiers of the substance	3
2	CLASSIFICATION AND LABELLING	4
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	5
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	6
3.5	Information to be requested to clarify the suspected risk	6
3.6	Potential follow-up and link to risk management	6

1 IDENTITY OF THE SUBSTANCE

1.1 Name and other identifiers of the substance

Table 1: Substance identity

Public Name:	Phenol, dodecyl-, sulfurized, carbonates, calcium salts, overbased
EC number:	272-234-3
EC name:	Phenol, dodecyl-, sulfurized, carbonates, calcium salts, overbased
CAS number (in the EC inventory):	68784-26-9
CAS number:	68784-26-9
CAS name:	Phenol, dodecyl-, sulfurized, carbonates, calcium salts, overbased
IUPAC name:	Unknown
Index number in Annex VI of the CLP Regulation	Not available
Molecular formula:	
Molecular weight or molecular weight range:	
Synonyms:	

Type of substance Mono-constituent Multi-constituent UVCB

Structural formula:

No data

2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

None

2.2 Proposal for Harmonised Classification in Annex VI of the CLP

None

2.3 Self classification

Classification of reprotoxicity is based on the presence of Phenol, dodecyl-, branched (CAS no.: 121158-58-5) as it is present in the mixture. However, a harmonized classification of Phenol, dodecyl-, branched (CAS no.: 121158-58-5) could not be found. This substance has probably been self classified by the industry. Classification for reprotoxicity varies according to different registrants.

Registrants classification according to Regulation 1272/2008 (CLP):

Repr 1B; H360: May damage fertility or the unborn child

Aq Chr 4; H413: May cause long lasting harmful effects to aquatic life.

Classification according to Directive 1999/45/EC (DSD):

Repr Cat 2; R60: May impair fertility.

R53; May cause long-term adverse effects in the aquatic environment.

Notified classification and labelling according to CLP criteria:

Aquatic Chronic 3; H412: Harmful to aquatic life with long lasting effects.

Repr. 2; H361: Suspected of damage fertility or the unborn child

Skin Irrit. 2; H315: Causes skin irritation

3 JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CORAP SUBSTANCE

3.1 Legal basis for the proposal

- Article 44(1) (refined prioritisation criteria for substance evaluation)
 Article 45(5) (Member State priority)

3.2 Grounds for concern

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

Criteria for selecting the substance for future substance evaluation are different CMR classifications, potential risk and tonnage.

The CMR (self-)classification is doubtful. There is uncertainty about the identity of one of the impurities and its classification. The (self-)classification is based on the impurity. It is questioned whether all registrations and test results are relevant to the different registrations of this substance.

In addition, the absence of risks for consumers is not sufficiently shown. DNEL's are derived with incorrect safety factors. Moreover, a RCR for consumer exposure is not provided. According to our own calculations it exceeds safe use by a factor 2.5. Seen the possible difference in composition it is questioned whether the results of the toxicity tests provide in a specific registration file are also relevant for the other registrations.

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			
<input type="checkbox"/> Industrial use	<input checked="" type="checkbox"/> Professional use	<input checked="" type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System
Production, formulation and both professional and consumers use are foreseen			

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

<input type="checkbox"/> Compliance check final	<input type="checkbox"/> Dangerous substances Directive 67/548/EEC
<input type="checkbox"/> Testing proposal	<input type="checkbox"/> Existing Substances Regulation 793/93/EEC
<input type="checkbox"/> Annex VI (CLP)	<input type="checkbox"/> Plant Protection Products Regulation 91/414/EEC
<input 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 type="checkbox"/> Annex XVII (Restriction)	
No data	

3.5 Information to be requested to clarify the suspected risk

<input 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 checked="" type="checkbox"/> Other (provide further details below)	
Substance ID information and RCR for consumer use	

3.6 Potential follow-up and link to risk management

<input checked="" type="checkbox"/> Restriction	<input checked="" type="checkbox"/> Harmonised C&L	<input checked="" type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
Potentially authorisation, restriction and/or harmonised classification and labelling.			