## 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

**Published:** 20/03/2013

---

**NOTE**

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

1 IDENTIFY 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

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

**Type of substance**  
- [ ] Mono-constituent  
- [ ] Multi-constituent  
- [x] 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

- (Suspected) CMR
- Wide dispersive use
- Cumulative exposure
- (Suspected) Sensitiser
- Consumer use
- High RCR
- (Suspected) PBT
- Exposure of sensitive populations
- Aggregated tonnage
- Suspected endocrine disruptor
- 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

- 1 – 10 tpa
- 1000 – 10,000 tpa
- 100,000 – 1000,000 tpa
- > 1000,000 tpa
- Confidential

- Industrial use
- Professional use
- Consumer use
- 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

<table>
<thead>
<tr>
<th>Compliance check final</th>
<th>Dangerous substances Directive 67/548/EEC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Testing proposal</td>
<td>Existing Substances Regulation 793/93/EEC</td>
</tr>
<tr>
<td>Annex VI (CLP)</td>
<td>Plant Protection Products Regulation 91/414/EEC</td>
</tr>
<tr>
<td>Annex XIV (Authorisation)</td>
<td>Other (provide further details below)</td>
</tr>
<tr>
<td>Annex XVII (Restriction)</td>
<td>No data</td>
</tr>
</tbody>
</table>

### 3.5 Information to be requested to clarify the suspected risk

<table>
<thead>
<tr>
<th>Information on toxicological properties</th>
<th>Information on physico-chemical properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information on fate and behaviour</td>
<td>Information on exposure</td>
</tr>
<tr>
<td>Information on ecotoxicological properties</td>
<td>Information on uses</td>
</tr>
<tr>
<td>Other (provide further details below)</td>
<td></td>
</tr>
</tbody>
</table>

Substance ID information and RCR for consumer use

### 3.6 Potential follow-up and link to risk management

<table>
<thead>
<tr>
<th>Restriction</th>
<th>Harmonised C&amp;L</th>
<th>Authorisation</th>
<th>Other (provide further details)</th>
</tr>
</thead>
</table>

Potentially authorisation, restriction and/or harmonised classification and labelling.