

Justification for the selection of a substance for CoRAP inclusion

Substance Name (Public Name): N,N'-dithiodi-o-phenylenedibenzamide

Chemical Group:

EC Number: 205-201-9

CAS Number: 135-57-9

Submitted by: Belgium

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Note

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

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1 IDENTITY OF THE SUBSTANCE

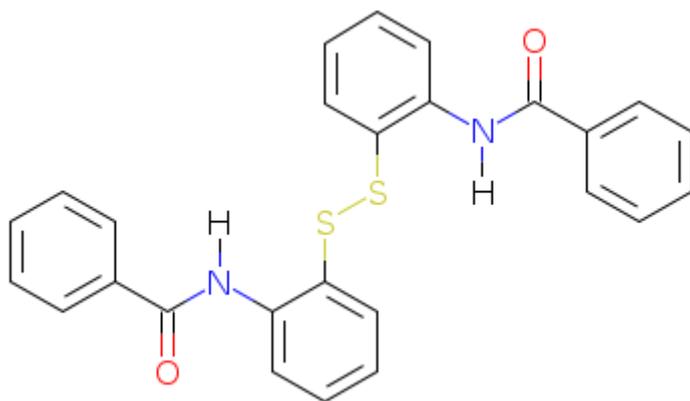
1.1 Other identifiers of the substance

Table 1: Substance identity

EC name:	N,N'-dithiodi-o-phenylenedibenzamide
IUPAC name:	N,N'-(disulfaneyldi-2,1-phenylene)dibenzamide
Index number in Annex VI of the CLP Regulation	NA
Molecular formula:	C ₂₆ H ₂₀ N ₂ O ₂ S ₂
Molecular weight or molecular weight range:	456.5792
Synonyms/Trade names:	Benzamide, N,N'-(dithiodi-2,1-phenylene)bis-

Type of substance Mono-constituent Multi-constituent UVCB

Structural formula:



1.2 Similar substances/grouping possibilities

NA

2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

NA

2.2 Self classification

- In the registration

Skin sens. 1; H317: May cause an allergic skin reaction

Aquatic Chronic 4; H413: May cause long lasting harmful effects to aquatic life

M(chronic)=10

- The following hazard classes are in addition notified among the aggregated self classifications in the C&L Inventory:

Eye Irrit. 2; H319: Causes serious eye irritation

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

Aquatic Acute 1; H400: Very toxic to aquatic life

Aquatic Chronic 1; H410: Very toxic to aquatic life with long lasting effects

Some with M-factor =10

2.3 Proposal for Harmonised Classification in Annex VI of the CLP

NA

3 INFORMATION ON AGGREGATED TONNAGE AND USES

From ECHA dissemination site			
<input type="checkbox"/> 1 – 10 tpa	<input type="checkbox"/> 10 – 100 tpa	<input checked="" type="checkbox"/> 100 – 1000 tpa	
<input type="checkbox"/> 1000 – 10,000 tpa	<input type="checkbox"/> 10,000 – 100,000 tpa	<input type="checkbox"/> 100,000 – 1,000,000 tpa	
<input type="checkbox"/> 1,000,000 – 10,000,000 tpa	<input type="checkbox"/> 10,000,000 – 100,000,000 tpa	<input type="checkbox"/> > 100,000,000 tpa	
<input type="checkbox"/> <1 >+ tpa (e.g. 10+ ; 100+ ; 10,000+ tpa)		<input type="checkbox"/> Confidential	
<input checked="" type="checkbox"/> Industrial use	<input type="checkbox"/> Professional use	<input type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System
<u>Industrial uses:</u> Storage, metering and mixing of the substance(or mixture) with other substances/mixtures in rubber article and polymer manufacture Processing of substance Formulation and repacking of substance <u>Article service life:</u> Production of preparations or articles by tableting, compression, extrusion, palletisation (Rubber articles)			

4 JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE

4.1 Legal basis for the proposal

- Article 44(2) (refined prioritisation criteria for substance evaluation)
- Article 45(5) (Member State priority)

4.2 Selection criteria met (why the substance qualifies for being in CoRAP)

- Fulfils criteria as CMR/ Suspected CMR
- Fulfils criteria as Sensitiser/ Suspected sensitiser
- Fulfils criteria as potential endocrine disruptor
- Fulfils criteria as PBT/vPvB / Suspected PBT/vPvB
- Fulfils criteria high (aggregated) tonnage (*tpa* > 1000)
- Fulfils exposure criteria
- Fulfils MS's (national) priorities

4.3 Initial grounds for concern to be clarified under Substance Evaluation

Hazard based concerns		
CMR <input type="checkbox"/> C <input type="checkbox"/> M <input type="checkbox"/> R	Suspected CMR ¹ <input type="checkbox"/> C <input type="checkbox"/> M <input type="checkbox"/> R	<input type="checkbox"/> Potential endocrine disruptor
<input type="checkbox"/> Sensitiser	Suspected Sensitiser ¹	
<input type="checkbox"/> PBT/vPvB	<input checked="" type="checkbox"/> Suspected PBT/vPvB ¹	<input type="checkbox"/> Other (please specify below)
Exposure/risk based concerns		
<input type="checkbox"/> Wide dispersive use	<input type="checkbox"/> Consumer use	<input type="checkbox"/> Exposure of sensitive populations
<input checked="" type="checkbox"/> Exposure of environment	<input type="checkbox"/> Exposure of workers	<input type="checkbox"/> Cumulative exposure
<input type="checkbox"/> High RCR	<input type="checkbox"/> High (aggregated) tonnage	<input type="checkbox"/> Other (please specify below)
<p><u>PBT</u>:</p> <p>P-criterion: screening criterion met, no data available to conclude on definitive criterion</p> <p>B-criterion: screening criterion not met, but close (log Kow=4); no data available to conclude on definitive criterion (log Kow episuite = 4.59)</p> <p>T-criterion: screening criterion met, no data available to conclude on definitive criterion</p> <p>RCRs fresh water below, but close to 1, should be verified further.</p> <p>The use of rubber articles (such as tires) may result in a high release into the environment.</p>		

¹ CMR/Sensitiser: known carcinogenic and/or mutagenic and/or reprotoxic properties/known sensitising properties (according to CLP harmonized or registrant self-classification or CLP Inventory)

Suspected CMR/Suspected sensitiser: suspected carcinogenic and/or mutagenic and/or reprotoxic properties/suspected sensitising properties (not classified according to CLP harmonized or registrant self-classification)

Suspected PBT: Potentially Persistent, Bioaccumulative and Toxic

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

<input type="checkbox"/> Compliance check, Final decision	<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 ; Biocidal Product Regulation (Regulation (EU) 528/2012)
<input type="checkbox"/> Annex XIV (Authorisation)	<input type="checkbox"/> Other (provide further details below)
<input type="checkbox"/> Annex XVII (Restriction)	
Information on other completed/ongoing regulatory processes was not found.	

4.5 Preliminary indication of information that may need to be requested to clarify the concern

<input type="checkbox"/> Information on toxicological properties	<input type="checkbox"/> Information on physico-chemical properties
<input checked="" type="checkbox"/> Information on fate and behaviour	<input checked="" type="checkbox"/> Information on exposure
<input checked="" type="checkbox"/> Information on ecotoxicological properties	<input type="checkbox"/> Information on uses
<input type="checkbox"/> Information ED potential	<input type="checkbox"/> Other (provide further details below)
<p><u>PBT</u>:</p> <p>P-criterion: screening criterion met, no data available to conclude on definitive criterion</p> <p>B-criterion: screening criterion not met, but close (log Kow=4); no data available to conclude on definitive criterion</p> <p>T-criterion: screening criterion met, no data available to conclude on definitive criteria</p> <p>RCRs fresh water below, but close to 1, should be verified further.</p> <p>The use of rubber articles (such as tires) may result into a high release into the environment.</p>	

4.6 Potential follow-up and link to risk management

<input type="checkbox"/> Harmonised C&L	<input type="checkbox"/> Restriction	<input checked="" type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
Depending on the outcome of the evaluation an identification as SVHC may be initiated if warranted.			