

Justification for the selection of a candidate CoRAP substance

Substance Name (Public Name):	Reaction product: bisphenol-A-(epichlorhydrin); epoxy resin (number average molecular weight \leq 700).
Chemical Group:	Organic. Epichlorhydrin epoxy resin
EC Number:	500-033-5
CAS Number:	25068-38-6
Submitted by:	Danish Environmental Protection Agency, Strandgade 29, 1401 Copenhagen. Denmark
Published:	20/03/2013

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 Name and other identifiers of the substance

Table 1: Substance identity

Public Name:	reaction product: bisphenol-A-(epichlorhydrin); epoxy resin (number average molecular weight \leq 700).
EC number:	500-033-5
EC name:	4,4'-Isopropylidenediphenol, oligomeric reaction products with 1-chloro-2,3-epoxypropane
CAS number (in the EC inventory):	25068-38-6
CAS number:	25068-38-6
CAS name:	
IUPAC name:	2-(chloromethyl)oxirane; 4-[2-(4-hydroxyphenyl)propan-2-yl]phenol
Index number in Annex VI of the CLP Regulation	603-074-00-8
Molecular formula:	Component 1 = Epichlorohydrin Component : CAS: 106-89-8 ; Formula: C ₃ H ₅ ClO Component 2 = Bisphenol-A Component CAS: 80-05-7 ; Formula: C ₁₅ H ₁₆ O ₂
Molecular weight or molecular weight range:	\geq 340 - \leq 700
Synonyms:	Bisphenol A, epichlorhydrin epoxy resin Average MW < 700. 2-(chloromethyl)oxirane; 4-[2-(4-hydroxyphenyl)propan-2-yl]phenol; 4,4'-Isopropylidenediphenol, oligomeric reaction products with 1-chloro-2,3-epoxypropane (BADGE); Bisphenol A epoxy resin;

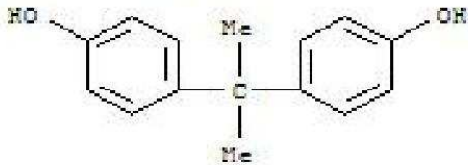
Type of substance Mono-constituent Multi-constituent UVCB

Structural formula:

Component Number 1



Component Number 2



2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

General Information

EC Number	CAS Number	Index Number	International Chemical Identification
500-033-5	25068-38-6	603-074-00-8	reaction product: bisphenol-A-(epichlorhydrin) epoxy resin (number average molecular weight \leq 700)

ATP Inserted / Updated: CLP00



CLP Classification (Table 3.1)

Classification		Labelling			Specific Concentration limits, M- Factors
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)	
Skin Irrit. 2	H315	H315		GHS07 GHS09 Wng	Skin Irrit. 2; H315: C ≥ 5% Eye Irrit. 2; H319: C ≥ 5%
Skin Sens. 1	H317	H317			
Eye Irrit. 2	H319	H319			
Aquatic Chronic 2	H411	H411			

H315: Causes skin irritation.

H317: Causes an allergic skin reaction.

H319: Causes serious eye irritation.

H411: Toxic to aquatic life with long lasting effects.

2.2 Proposal for Harmonised Classification in Annex VI of the CLP

None proposed.

2.3 Self classification

None self classified.

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 checked="" type="checkbox"/> Suspected endocrine disruptor	<input type="checkbox"/> Other (provide further details below)	

The substance ID needs to be clarified as the registrant claims that it is a mono-constituent substance, but based on the manufacturing process it may be a UVCB or multi-constituent substance. Furthermore, there are seven registrations under the same CAS no with different names; this also needs to be clarified.

The substance is a suspected mutagen and endocrine disruptor with wide dispersive and consumer use. The substance is very similar to Bisphenol A diglycidyl ether polymer, CAS no 25036-25-3 that is on the Danish list of unwanted substances, suspected to be an endocrine disrupter.

The substance has been tested positive in several in vitro genotoxicity tests, but negative in in vivo genotoxicity tests, however the tests are very old and not performed according to GLP.

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 type="checkbox"/> 10,000 – 100,000 tpa		
<input checked="" type="checkbox"/> 100,000 – 1000,000 tpa	<input type="checkbox"/> > 1000,000 tpa		
<input type="checkbox"/> Confidential			
Note: there are seven registration, each with the above mentioned tonnage bands.			
<input checked="" type="checkbox"/> Industrial use	<input checked="" type="checkbox"/> Professional use	<input type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System

Industrial use:
Industrial application of coatings, castings, marine & protective coatings, electrical casting
Industrial formulation of can & coil coatings, photocure coatings, automotive coatings

Professional use:
Coatings and paints, thinners, paint removes

Consumer use:
Applications of adhesives and paints

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

<input type="checkbox"/> Compliance check	<input type="checkbox"/> Dangerous substances Directive 67/548/EEC
<input type="checkbox"/> Testing proposal	<input type="checkbox"/> Existing Substances Regulation 793/93/EEC
<input checked="" 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 checked="" type="checkbox"/> Other (provide further details below)
<input type="checkbox"/> Annex XVII (Restriction)	
<p>The substance is very similar to Bisphenol A diglycidyl ether polymer, CAS no. 25036-25-3 that is on the Danish list of unwanted substances, suspected to be an endocrine disrupter.</p>	

3.5 Information to be requested to clarify the suspected risk

<input checked="" type="checkbox"/> Information on toxicological properties	<input type="checkbox"/> Information on physico-chemical properties
<input type="checkbox"/> Information on fate and behaviour	<input type="checkbox"/> Information on exposure
<input checked="" type="checkbox"/> Information on ecotoxicological properties	<input type="checkbox"/> Information on uses
<input checked="" type="checkbox"/> Other (provide further details below)	
<p>Depending on the outcome of the substance evaluation further testing may be required.</p>	

3.6 Potential follow-up and link to risk management

<input type="checkbox"/> Restriction	<input checked="" type="checkbox"/> Harmonised C&L	<input type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
<p>Please provide further details</p>			