Justification for the selection of a substance for CoRAP inclusion

– Update –

Substance Name (Public Name):	Benzotriazole
Chemical Group:	
EC Number:	202-394-1
CAS Number:	95-14-7
Submitted by:	Germany
Published:	26/03/2014 Update 22/03/2016

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

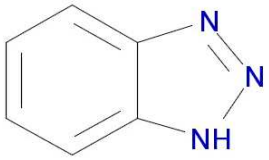
1.1 Other identifiers of the substance

Table 1: Substance identity

EC name:	Benzotriazole
IUPAC name:	1*H*-Benzotriazole
Index number in Annex VI of the CLP Regulation	-
Molecular formula:	$C_6H_5N_3$
Molecular weight or molecular weight range:	119.12 g/mol
Synonyms/Trade names:	1,2,3-Benzotriazole 1,2,3-Benztriazole 1,2,3-Triaza-1H-indene 1,2,3-Triazaindene 1,2-Aminoazophenylene 1H-1,2,3-Benzotriazole 2,3-Diazaindole Azimidobenzene Aziminobenzene B 0094 BLS 1326 BT 120 BTA Benzene azimide Benzisotriazole Benztriazole C.V.I. Liquid Cobratec 35G Cobratec 99 D 32-108 Entek ISK 3 Irgastab I 489 Kemitec TT M 318 Miracle HP 16 NSC 3058 Rusmin R Seetec BT Seetec BT-R T 706 TH-BTA Verzone Crystal Verzone Crystal 120

Type of substance ☒ Mono-constituent ☐ Multi-constituent ☐ UVCB

Structural formula:



1.2 Similar substances/grouping possibilities

None identified.

2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

There is no harmonized classification of 1*H*-Benzotriazole according to Annex VI of Regulation (EC) No 1272/2008.

2.2 Self classification

- In the registration

Acute Tox. 4; H302: Harmful if swallowed

Eye Irrit. 2; H319: Causes serious eye irritation.

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

Signal Words: Warning Pictograms: GHS07

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

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)**	
Eye Dam. 1	H318	H318		
Skin Irrit. 2	H315	H315		
Acute Tox. 3	H301	H301		
Acute Tox. 4	H312	H312		
Acute Tox. 2	H330	H330		
Acute Tox. 3	H331	H331		
Acute Tox. 4	H332	H332		
STOT SE 3	H336	H336		
STOT SE 3	H335	H335		
Muta. 2	H341	H341		
Aquatic Chronic 4	H413	H413		
Flam. Sol. 1	H228	H228		
Not Classified				

Signal Words:	**Pictograms**:
Danger	GHS07
Warning	GHS02
	GHS05
	GHS06
	GHS08

2.3 Proposal for Harmonised Classification in Annex VI of the CLP

None

3 INFORMATION ON AGGREGATED TONNAGE AND USES

From ECHA dissemination site		
☐ 1 – 10 tpa	☐ 10 – 100 tpa	☐ 100 – 1000 tpa
☒ 1000 – 10,000 tpa	☐ 10,000 – 100,000 tpa	☐ 100,000 – 1,000,000 tpa
☐ 1,000,000 – 10,000,000 tpa	☐ 10,000,000 – 100,000,000 tpa	☐ > 100,000,000 tpa
☐ <1 . . . . . >+ tpa (e.g. 10+ ; 100+ ; 10,000+ tpa)		☐ Confidential

☒ Industrial use	☒ Professional use	☒ Consumer use	☐ Closed System

1-h-benzotriazole is used for the prevention of corrosion of metals and for example used for the protection of roofs or used in dish washer tabs. Other uses are e.g. professional use in lubricants and greases, use in heat transfer fluids, use in medical devices, de-icing of roads

Hence, industrial, professional and consumer uses are indicated.

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 disrupter

☐ 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 ☐C ☐M ☐R	Suspected CMR[1] ☐C ☐M ☐R	☒ Potential endocrine disruptor
☐ Sensitiser	☐ Suspected Sensitiser[1]	
☐ PBT/vPvB	☐ Suspected PBT/vPvB[1]	☐ Other (please specify below)
Exposure/risk based concerns		
☐ Wide dispersive use	☐ Consumer use	☐ Exposure of sensitive populations
☒ Exposure of environment	☐ Exposure of workers	☐ Cumulative exposure
☐ High RCR	☐ High (aggregated) tonnage	☐ Other (please specify below)
There is scientific evidence from in vitro as well as in vivo studies, that 1-h-benzotriazole can bind to the estrogen receptor and act as estrogen agonist, leadingto adverse effects in organisms in the environment. UBA considers a substance evaluation for 1-h-benzotriazole as necessary to check if the concerns regarding endocrine disrupting properties are sufficient to confirm that it is as endocrine disrupting substance for the environment.		

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

☐ Compliance check, Final decision	☐ Dangerous substances Directive 67/548/EEC
☒ Testing proposal	☐ Existing Substances Regulation 793/93/EEC
☐ Annex VI (CLP)	☐ Plant Protection Products Regulation 91/414/EEC
☐ Annex XV (SVHC)	☐ Biocidal Products Directive 98/8/EEC ; Biocidal Product Regulation (Regulation (EU) 528/2012)
☐ Annex XIV (Authorisation)	☐ Other (provide further details below)
☐ Annex XVII (Restriction)	
Testing proposal for: Endpoint: Reproductive toxicity (prenatal developmental toxicity. Public consultation ended 05/12/2013.	

[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

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

☐ Information on toxicological properties	☐ Information on physico-chemical properties
☐ Information on fate and behaviour	☐ Information on exposure
☒ Information on ecotoxicological properties	☐ Information on uses
☒ Information ED potential	☐ Other (provide further details below)
There is some scientific evidence on the ED properties of 1-h-benzotriazole. Further information on the ED potential as well as ecotoxicological data for invertebrate and vertebrates species is needed to clarify the concern. This may lead to the request of relevant fish toxicity studies including fish sexual development test or fish full life cycle.	

4.6 Potential follow-up and link to risk management

☐ Harmonised C&L	☐ Restriction	☐ Authorisation	☒ Other (provide further details)
If the concern is substantiated a SVHC-identification according to art. 57 f will be proposed.			