

## Justification for the selection of a substance for CoRAP inclusion

**Substance Name (Public Name):** Benzotriazole

**Chemical Group:**

**EC Number:** 202-394-1

**CAS Number:** 95-14-7

**Submitted by:** Germany

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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	Other identifiers of the substance	3
2	CLASSIFICATION AND LABELLING.....	4
2.1	Harmonised Classification in Annex VI of the CLP	4
2.2	Self classification	4
2.3	Proposal for Harmonised Classification in Annex VI of the CLP	5
3	INFORMATION ON AGGREGATED TONNAGE AND USES.....	5
4	JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE .....	6
4.1	Legal basis for the proposal	6
4.2	Selection criteria met (why the substance qualifies for being in CoRAP)	6
4.3	Initial grounds for concern to be clarified under Substance Evaluation	6
4.4	Other completed/ongoing regulatory processes that may affect suitability for substance evaluation	7
4.5	Preliminary indication of information that may need to be requested to clarify the concern	7
4.6	Potential follow-up and link to risk management	7

## 1 IDENTITY OF THE SUBSTANCE

### 1.1 Other identifiers of the substance

Table 1: Substance identity

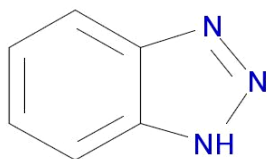
<b>EC name:</b>	Benzotriazole
<b>IUPAC name:</b>	1 <i>H</i> -Benzotriazole
<b>Index number in Annex VI of the CLP Regulation</b>	-
<b>Molecular formula:</b>	C <sub>6</sub> H <sub>5</sub> N <sub>3</sub>
<b>Molecular weight or molecular weight range:</b>	119.12 g/mol
<b>Synonyms/Trade names:</b>	1,2,3-Benzotriazole 1,2,3-Benzotriazole 1,2,3-Triaza-1 <i>H</i> -indene 1,2,3-Triazaindene 1,2-Aminoazophenylene 1 <i>H</i> -1,2,3-Benzotriazole 2,3-Diazaindole Azimidobenzene Aziminobenzene B 0094 BLS 1326 BT 120 BTA Benzene azimide Benzisotriazole Benzotriazole 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:**

Danger  
Warning

**Pictograms:**

GHS07  
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			
<input type="checkbox"/> 1 – 10 tpa	<input type="checkbox"/> 10 – 100 tpa	<input type="checkbox"/> 100 – 1000 tpa	
<input checked="" 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 checked="" type="checkbox"/> Professional use	<input checked="" type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System
<p>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</p> <p>Hence, industrial, professional and consumer uses are indicated.</p>			

## 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 <sup>1</sup> <input type="checkbox"/> C <input type="checkbox"/> M <input type="checkbox"/> R	<input checked="" type="checkbox"/> Potential endocrine disruptor
<input type="checkbox"/> Sensitiser	<input type="checkbox"/> Suspected Sensitiser <sup>1</sup>	
<input type="checkbox"/> PBT/vPvB	<input type="checkbox"/> Suspected PBT/vPvB <sup>1</sup>	<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 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)
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, leading to 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.		

<sup>1</sup> 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 checked="" 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)	
<p>Testing proposal for:</p> <p>Endpoint: Reproductive toxicity (prenatal developmental toxicity).</p> <p>Public consultation ended 05/12/2013.</p>	

#### 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 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"/> Information ED potential	<input type="checkbox"/> Other (provide further details below)
<p>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.</p>	

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

<input type="checkbox"/> Harmonised C&L	<input type="checkbox"/> Restriction	<input type="checkbox"/> Authorisation	<input checked="" type="checkbox"/> Other (provide further details)
<p>If the concern is substantiated a SVHC-identification according to art. 57 f will be proposed.</p>			