Evonik Operations GmbH Kirschenallee 64293 Darmstadt, Germany

European Chemicals Agency
Telakkakatu 6
00150 Helsinki
Finnland

January 18, 2021

Comment on the dossier proposing harmonised classification and labelling of Tetramethylene dimethacrylate (CAS 2082-81-7, EC 218-218-1)

Dear Sir or Madam,

On 9th of November, 2020, ECHA published the CLH proposal of the Finnish MSCA to classify Tetramethylene Dimethacrylate, EC number 218-218-1, for its potential skin sensitisation properties.

We are herewith commenting as Evonik Operations GmbH as the Lead Registrant of this substance.

With reference to the CLH dossier regarding Tetramethylene Dimethacrylate (EC number 218-218-1), we agree with the harmonised classification as Skin Sens 1B, H317, mainly based on animal data, namely LLNA data, proposed by the Finnish MSCA. We also agree to the proposed assessment on human data that this data supports the classification and labelling in a weight of evidence approach and does not allow a sub-categorisation due to the absence of exposure information.

Sincerely yours,
Evonik Operations GmbH