

February 3, 2023

JBMIA's Comments on the acute inhalation toxicity of Silanamine, 1,1,1-trimethyl-N-(trimethylsilyl)-, hydrolysis products with silica (EC No.:272-697-1, CAS No.:68909-20-6)

**Japan Business Machine and Information System Industries Association
(JBMIA)**

Japan Business Machine and Information System Industries Association (JBMIA) represents the global leading companies of business machines industry, and our main products are printers, copying machines, multifunction devices (MFDs), and their consumables, including toner.

JBMIA appreciates the opportunity to give our feedback on "Harmonised classification and labelling targeted consultations" for Silanamine, 1,1,1-trimethyl-N- (trimethylsilyl), hydrolysis products with silica; pyrogenic, synthetic amorphous, nano, surface treated silicon dioxide (HMDZ-treated SAS; EC Number 272-697-1)

Our Comments

JBMIA would like endorse the comments submitted by The Association of Synthetic Amorphous Silica Producers (ASASP). The new study report (Fraunhofer ITEM Study No. 02 G 21 009) clearly shows that the cause of animal death is suffocation, a physical effect due to the presence of foreign materials and not due to an intrinsic (i.e. substance-specific) toxic effect. In addition, such a physical blockage is not relevant for humans due to anatomical differences between rat and human respiratory tracts. For this reason, HMDZ-treated SAS does not meet the requirements for acute toxicity classification. JBMIA kindly ask that the current RAC opinion on the classification for acute inhalation toxicity of this substance as Acute Tox. 2; H330 should be revised.

About JBMIA

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy



and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof. The advancement of information technology has brought about sophistication of the age of digitalization and networking and resulted in significant changes in the office environment accordingly. In response to the shift of business emphasis from the hardware to total business solutions including products, JBMIA carries out active committee/group activities regarding important issues that the industries are confronting in and outside Japan by conducting investigations and researches regarding the policy proposals, international cooperation, prevention of warming, environment preservation, standardization, product safety, etc., by deepening the association with the sales and software-related companies, as well as the manufacturers.

Japan Business Machine Information System Industries Association (JBMIA)

Address: Lila - Hijirizaka, 3 - 4 - 10 Minato - ku, Tokyo 108 - 0073 Japan

TEL: +81 - 3 - 6809 - 5010 FAX: +81 - 3 - 3451 - 1770

<https://www.jbmia.or.jp/index.php>

Contact information: Kazuhito Oosumi, Director, Environmental Division, JBMIA

oosumi.kazuhito@jbmia.or.jp