

COMMENTS AND RESPONSE TO COMMENTS ON OEL: PROPOSAL AND JUSTIFICATION

All comments and attachments including confidential information received during the consultation have been provided in full to the Committees and to the European Commission. Non-confidential attachments that have not been copied into the table directly are published after the consultation and are also published together with the opinion (after adoption) on ECHA's website. Journal articles are not confidential; however they are not published on the website due to Intellectual Property Rights.

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Last data extracted on 20.12.2022

Substance name: 1,2-dichloropropane

EC number: 201-152-2

CAS number: 78-87-5

GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
14.12.2022	Sweden		Individual	1
Comment received				
See attachment for comments				
ECHA note – An attachment was submitted with the comment above. Refer to public attachment NEG comments on ECHA 12-dichloropropane 6 Dec 2022.pdf				
ECHA/RAC Response				
Your detailed comments have been considered and several corrections or editorial changes have been implemented and details have been specified in the in the Opinion and/or Annex 1.				
Further details and explanations on T25 calculation have been added to Section 9.1.2 (Cancer risk assessment).				
The uncertainty related to the difference in cancer types observed in humans and animals and the use of a single animal study for the ERR calculations has been highlighted.				
As suggested in your comments, the Annex now points out that there is insufficient information available to conclude on a threshold MoA for carcinogenic action, and therefore a non-threshold MoA is assumed.				
The considerations about 2-HPMA were included because it is considered as a possible biomarker. We find it more transparent to keep the information in the document and explain why it is not proposed as a biomarker.				

Date	Country	Organisation	Type of Organisation	Comment number
03.12.2022	United Kingdom		Individual	2
Comment received				

p.13-p.16 Occurrence, use and occupational exposure

Dear committee,

I have undertaken work evaluating the occurrence of 1,2-dichloropropane during spray foam insulation installation. Below you could find three published peer-reviewed papers that reveal 1,2-DCP could be found in measurable concentrations emitted from spray foam one and two-component materials. I have attached copies of all publications.

<https://www.sciencedirect.com/science/article/abs/pii/S0360132319307711> - the literature review revealed that 1,2-DCP has been found released from spray foam products.

<https://www.sciencedirect.com/science/article/abs/pii/S0360132321008350> - this study experimentally tested the hypothesis whether 1,2-DCP was found emitting from spray foam products or was a degradation product from flame retardants found in spray foam products. The study revealed that 1,2-DCP was detected during spraying and curing of DIY spray foams. The study could not definitively rule out chemical reactions for the occurrence of 1,2-DCP, however I think it is important to consider spray foam products as a potential exposure pathway for both occupational exposure (workers) and general population.

<https://discovery.ucl.ac.uk/id/eprint/10086008/> - a small scale study revealed 1,2-DCP concentrations up to 7526 µg/m³ could be found near the spraying area during application of spray foam. However utilisation of robots and robust ventilation practices could reduce worker exposure by a significant factor.

I hope these scientific results shed further light on both occupational exposure and general population exposure to 1,2-DCP that have not been considered in the report.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 1,2-DCP studies (Naldzhiev et al).zip

ECHA/RAC Response

Thank you for your contribution.

We have reviewed your links and updated the sections where relevant.

PUBLIC ATTACHMENTS

1. NEG comments on ECHA 12-dichloropropane 6 Dec 2022.pdf [Please refer to comment No. 1]
2. 1,2-DCP studies (Naldzhiev et al).zip [Please refer to comment No. 2]