

**Committee for Risk Assessment  
RAC**

Annex  
**Records**

of the targeted public consultation on the

**M-factors for long-term aquatic hazard for the  
copper substances listed in Commission  
Regulation (EU) 2016/1179**

**ECHA/RAC/ A77-O-0000001412-86-262/F**

**Adopted  
15 March 2019**

## COMMENTS AND RESPONSE TO COMMENTS ON CLH: PROPOSAL AND JUSTIFICATION

Comments provided during public consultation are made available in this table as submitted by the webform. Please note that the comments displayed below may have been accompanied by attachments which are not published in this table.

ECHA accepts no responsibility or liability for the content of this table.

**Last data extracted on 13.02.2019**

**Substance name: Copper compounds**

**CAS number: -**

**EC number: -**

**Dossier submitter: European Commission**

### GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
04.02.2019	Belgium	European Copper Institute	Industry or trade association	1
Comment received				
See comments in the attached document.				
ECHA note – An attachment was submitted with the comment above. Refer to public attachment 20190204_Copper compounds M-factor - ECI input FINAL.docx				

### OTHER HAZARDS AND ENDPOINTS – Hazardous to the Aquatic Environment

Date	Country	Organisation	Type of Organisation	Comment number
01.02.2019	Finland		MemberState	2
Comment received				
<p>The targeted public consultation was launched to receive comments on the proposal to add M-factors for long-term aquatic hazard for ten copper compounds.</p> <p>RAC opinions for these ten copper-containing substances were adopted in December 2014. Back then the surrogate method was used for chronic classification due to uncertainties in the completeness of the chronic dataset for fish. The copper ecotoxicity dataset has been updated after that for granulated copper, and a RAC opinion for granulated copper was adopted in June 2018. The chronic M-factors for the ten copper compounds have therefore re-assessed using the revised chronic ecotoxicological reference values (ERVs) from the updated dossier. In the targeted consultation, especially comments on the M-factor for 'copper flakes (coated with aliphatic acid)' were welcome.</p> <p>Nine of these copper compounds are considered to be readily water soluble and the tenth, copper flakes (coated with aliphatic acid) is a form of copper metal. Setting M-factors for soluble metal compounds and for metals (and poorly soluble metal compounds) differs as it is explained in the CLP guidance (version 5.0, July 2017). For soluble metal compounds M-factors are applied as for organic substances and for metals transformation/dissolution protocol (T/Dp) data need to be taken into account. This difference could be better explained in the draft opinion as now it lacks the explanation how the M-factors are derived for the nine soluble compounds.</p> <p>Considering which loading rate (0.1 mg/L vs. 1.0 mg/L) is appropriate when setting the M-</p>				

factor for copper flakes (coated with aliphatic acid) we are in favour of using the loading rate of 0.1 mg/L. Reasoning for this is that M-factor is relevant only for Aquatic Chronic Category 1 classification which is applicable if dissolved metal ion concentration from the 28-d transformation test at loading rate of 0.1 mg/L is greater or equal to chronic ERV. Transformation test result at a loading rate of 1 mg/L is relevant for Category Chronic 2 classification, in which case M-factor is not needed. As a result, choosing the loading rate of 0.1 mg/L would give the chronic M-factor of 10 for copper flakes (coated with aliphatic acid) at neutral pH.

Date	Country	Organisation	Type of Organisation	Comment number
04.02.2019	Belgium	European Copper Institute	Industry or trade association	3
Comment received				
See comments in the attached document.				
ECHA note – An attachment was submitted with the comment above. Refer to public attachment 20190204_Copper compounds M-factor - ECI input FINAL.docx				

#### PUBLIC ATTACHMENTS

1. 20190204\_Copper compounds M-factor - ECI input FINAL.docx [Please refer to comment No. 1, 3]