

Justification Document for the Selection of a CoRAP Substance

Substance Name (public name): 2,4,6-trichloro-1,3,5-triazine

EC Number: 203-614-9

CAS Number: 108-77-0

Authority: Bureau for Chemical Substances,
Poland

Date: 22/03/2016

Note

This document has been prepared by the evaluating Member State given in the CoRAP update.

Table of Contents

1	IDENTITY OF THE SUBSTANCE	3
1.1	Other identifiers of the substance	3
1.2	Similar substances/grouping possibilities	3
2	OVERVIEW OF OTHER PROCESSES / EU LEGISLATION	4
3	HAZARD INFORMATION (INCLUDING CLASSIFICATION)	5
3.1	Classification	5
3.1.1	Harmonised Classification in Annex VI of the CLP	5
3.1.2	Self classification	5
3.1.3	Proposal for Harmonised Classification in Annex VI of the CLP	5
4	INFORMATION ON (AGGREGATED) TONNAGE AND USES	6
4.1	Tonnage and registration status	6
4.2	Overview of uses	6
5.	JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CORAP SUBSTANCE	7
5.1.	Legal basis for the proposal	7
5.2.	Selection criteria met (why the substance qualifies for being in CoRAP)	7
5.3	Initial grounds for concern to be clarified under Substance Evaluation	7
5.4	Preliminary indication of information that may need to be requested to clarify the concern	8
5.5	Potential follow-up and link to risk management	8

1 IDENTITY OF THE SUBSTANCE

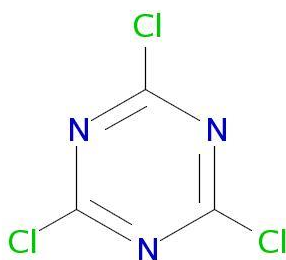
1.1 Other identifiers of the substance

Table: Other Substance identifiers

EC name (public):	2,4,6-trichloro-1,3,5-triazine
IUPAC name (public):	2,4,6-trichloro-1,3,5-triazine
Index number in Annex VI of the CLP Regulation:	613-009-00-5
Molecular formula:	C ₃ Cl ₃ N ₃
Molecular weight or molecular weight range:	184.4112
Synonyms:	Cyanuric chloride

Type of substance Mono-constituent Multi-constituent UVCB

Structural formula:



1.2 Similar substances/grouping possibilities

-

2 OVERVIEW OF OTHER PROCESSES / EU LEGISLATION

Table: Completed or ongoing processes

RMOA	<input type="checkbox"/> Risk Management Option Analysis (RMOA)	
REACH Processes	Evaluation	<input type="checkbox"/> Compliance check, Final decision
		<input type="checkbox"/> Testing proposal
		<input type="checkbox"/> CoRAP and Substance Evaluation
	Authorisation	<input type="checkbox"/> Candidate List
		<input type="checkbox"/> Annex XIV
	Restriction	<input type="checkbox"/> Annex XVII
Harmonised C&L	<input type="checkbox"/> Annex VI (CLP) (see section 3.1)	
Processes under other EU legislation	<input type="checkbox"/> Plant Protection Products Regulation Regulation (EC) No 1107/2009	
	<input type="checkbox"/> Biocidal Product Regulation Regulation (EU) 528/2012 and amendments	
Previous legislation	<input type="checkbox"/> Dangerous substances Directive Directive 67/548/EEC (NONS)	
	<input type="checkbox"/> Existing Substances Regulation Regulation 793/93/EEC (RAR/RRS)	
(UNEP) Stockholm convention (POPs Protocol)	<input type="checkbox"/> Assessment	
	<input type="checkbox"/> In relevant Annex	
Other processes / EU legislation	<input type="checkbox"/> Other (provide further details below)	

3 HAZARD INFORMATION (INCLUDING CLASSIFICATION)

3.1 Classification

3.1.1 Harmonised Classification in Annex VI of the CLP

Table: Harmonised classification

Index No	International Chemical Identification	EC No	CAS No	Classification		Suppl. Hazard statement Code(s)	Spec. Conc. Limits, M-factors
				Hazard Class and Category Code(s)	Hazard statement code(s)		
613-009-00-5	2,4,6-trichloro-1,3,5-triazine; cyanuric chloride	203-614-9	108-77-0	Acute Tox. 2* Acute Tox. 4* Skin Corr. 1B Skin Sens. 1	H330 H302 H314 H317	EUH014	STOT SE 3; H335: C ≥ 5%

3.1.2 Self classification

- In the registration:

Classification		Labelling			Spec. Conc. Limits, M-factors	Notes
Hazard Class and Category Code(s)	Hazard statement code(s)	Pictogram, Signal Word Code(s)	Hazard statement code(s)	Suppl. Hazard statement code(s)		
STOT SE 3	H335	GHS07	H335	C ≥ 5%	--	--
Eye Dam. 1	H318	GHS05	H318	-	--	--

- The following hazard classes are in addition notified among the aggregated self classifications in the C&L Inventory:

Table : Additional notified classification and labelling according to CLP criteria (beside of harmonised classification and the ones of registrants). Taken from <http://echa.europa.eu/information-on-chemicals/cl-inventory-database/-/cl-inventory/view-notification-summary/113877>:

Classification		Labelling			Spec. Conc. Limits, M-factors	Notes
Hazard Class and Category Code(s)	Hazard statement code(s)	Pictogram, Signal Word Code(s)	Hazard statement code(s)	Suppl. Hazard statement code(s)		
Resp.Sens. 1	H334	GHS08	H334	-	-	-
Met. Corr. 1	H290		H209			

3.1.3 Proposal for Harmonised Classification in Annex VI of the CLP

Classification due to eye damage cat 1 can be proposed.

4 INFORMATION ON (AGGREGATED) TONNAGE AND USES¹

4.1 Tonnage and registration status

Table: Tonnage and registration status

From ECHA dissemination site		
<input checked="" type="checkbox"/> Full registration(s) (Art. 10)	<input type="checkbox"/> Intermediate registration(s) (Art. 17 and/or 18)	
Tonnage band (as per dissemination site)		
<input type="checkbox"/> 1 - 10 tpa	<input type="checkbox"/> 10 - 100 tpa	<input type="checkbox"/> 100 - 1000 tpa
<input type="checkbox"/> 1000 - 10,000 tpa	<input checked="" 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
Joint submission		

4.2 Overview of uses

Part 1:

<input checked="" type="checkbox"/> Manufacture	<input type="checkbox"/> Formulation	<input checked="" type="checkbox"/> Industrial use	<input type="checkbox"/> Professional use	<input type="checkbox"/> Consumer use	<input type="checkbox"/> Article service life	<input checked="" type="checkbox"/> Closed system
---	--------------------------------------	--	---	---------------------------------------	---	---

¹ The ECHA dissemination site was accessed 20.03.2016.

5. JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE

5.1. Legal basis for the proposal

- Article 44(2) (refined prioritisation criteria for substance evaluation)
 Article 45(5) (Member State priority)

5.2. 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 disrupter
 Fulfils criteria as PBT/vPvB / Suspected PBT/vPvB
 Fulfils criteria high (aggregated) tonnage (*tpa* > 1000)
 Fulfils exposure criteria
 Fulfils MS's (national) priorities

5.3 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 ² <input type="checkbox"/> C <input type="checkbox"/> M <input checked="" type="checkbox"/> R	<input type="checkbox"/> Potential endocrine disruptor
<input type="checkbox"/> Sensitiser	<input type="checkbox"/> Suspected Sensitiser ²	
<input type="checkbox"/> PBT/vPvB	<input checked="" type="checkbox"/> Suspected PBT/vPvB ²	<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 checked="" type="checkbox"/> Exposure of environment	<input type="checkbox"/> Exposure of workers	<input type="checkbox"/> Cumulative exposure
<input type="checkbox"/> High RCR	<input checked="" type="checkbox"/> High (aggregated) tonnage	<input type="checkbox"/> Other (please specify below)

² 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

Suspected CMR:

The substance is recognized as potential reprotoxic compound. Some adverse effects on embryo/fetal development was noted, although such effects were observed only in combination with severe maternal toxicity. In the developmental toxicity study, at the dose of 50 mg/kg of cyanuric chloride maternal toxicity became apparent (decreased body weight gain and clinical signs). Increased post-implantation loss and a decreased number of live fetuses were reported. (OECD SIDS, 2001)

Additional concern:

Possible concern: cyanuric chloride is not readily biodegradable thus P criterion is fulfilled. The other PBT criteria need to be verified in the course of substance evaluation.

5.4 Preliminary indication of information that may need to be requested to clarify the concern

<input checked="" 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 type="checkbox"/> Information ED potential	<input type="checkbox"/> Other (provide further details below)
At the moment it is difficult to indicate what additional information will be needed.	

5.5 Potential follow-up and link to risk management

<input checked="" type="checkbox"/> Harmonised C&L	<input type="checkbox"/> Restriction	<input type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
<p>Eye corrosion of the substance was investigated in two <i>in vivo</i> studies (reliability=2). Under the conditions of the key eye irritation study an average cornea opacity of 3, an average iris score of 2, an average chemosis score of 3 and an average conjunctiva redness score of 3 for the animals with rinsed eyes was determined. For the animal with not rinsing of the treated eye 30 seconds after treatment an average cornea opacity of 1.3, an average iris score of 0.66, an average chemosis score of 2 and an average conjunctiva redness score of 3 could be demonstrated. The animal with the eye not rinsed after treatment showed more potent effects and thus represents the worst case.</p> <p>According to supporting study an overall irritation score of 64.7 (max 110) was deduced under the test conditions (averages on values from 24, 48 and 72 h and all animals, according to Kay and Calandra (1962)).</p> <p>Based on the results it can be concluded that the test substance has corrosive effects on the eye of rabbits. According to the study results the classification due to eye damage may be indicated.</p> <p>Further actions will depend on the results of the substance evaluation.</p>			