

Justification for the selection of a substance for CoRAP inclusion

Substance Name (Public Name):	Aluminium chloride basic
Chemical Group:	inorganic mono constituent substance
EC Number:	215-477-2
CAS Number:	1327-41-9
Submitted by:	France
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Note

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

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1 IDENTITY OF THE SUBSTANCE

1.1 Other identifiers of the substance

Table 1: Substance identity

EC name:	Aluminium chloride basic
IUPAC name:	Aluminum trichloride
Index number in Annex VI of the CLP Regulation	-
Molecular formula:	$\text{Al(OH)}_x(\text{Cl})_{3-x}$
Molecular weight or molecular weight range:	-
Synonyms/Trade names:	Povimal Polyaluminium chloride

Type of substance Mono-constituent Multi-constituent UVCB

Structural formula:



1.2 Similar substances/grouping possibilities

Aluminium chloride basic is a soluble aluminium compound and may be grouped with other registered soluble aluminium compounds. A preliminary analysis would be needed to define the scope of such a category.

2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

Not listed

2.2 Self classification

- In the registration

Aluminium chloride basic (aqueous solution)
Met. Corr. 1; H290 (May be corrosive to metals) Eye Dam. 1; H318 (Causes serious eye damage)
Generic concentration limits are applied. Solutions may be classified as H319 Causes serious eye irritation when pH >2. Met. Corr. 1 only applies to aqueous solution.

- The following hazard classes are in addition notified among the aggregated self classifications in the C&L Inventory:
 - Skin Corr. 1B; H314 , Skin Irrit. 2; H315 , Eye Irrit. 2; H319

2.3 Proposal for Harmonised Classification in Annex VI of the CLP

No current proposal or intention.

3 INFORMATION ON AGGREGATED TONNAGE AND USES

From ECHA 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 type="checkbox"/> 10,000 - 100,000 tpa	<input checked="" 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	
<input checked="" type="checkbox"/> Industrial use	<input checked="" type="checkbox"/> Professional use	<input type="checkbox"/> Consumer use	<input type="checkbox"/> Closed System
Aggregated tonnage reaches a high amount (100,000-1,000,000 tpa).			

4 JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CoRAP SUBSTANCE

4.1 Legal basis for the proposal

- Article 44(1) (refined prioritisation criteria for substance evaluation)
- Article 45(5) (Member State priority)

4.2 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

4.3 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 ¹ <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 ¹	
<input type="checkbox"/> PBT/vPvB	<input type="checkbox"/> Suspected PBT/vPvB ¹	<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 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)

¹ 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

FR notes that the aluminium chloride basic overlap with other aluminium salts scheduled for evaluation in 2015, e.g. in terms of uses but also in terms of registration dossier content.

It is also noted that a report of the Health Council from Netherlands from 2009² recommend to classify soluble aluminium compounds as Repr 2 for developmental toxicity under Directive 67/548/EEC (equivalent to Repr 1B under CLP), confirming a concern on this endpoint for all soluble aluminium salts.

4.4 Other completed/ongoing regulatory processes that may affect suitability for substance evaluation

<input type="checkbox"/> Compliance check, Final decision	<input type="checkbox"/> Dangerous substances Directive 67/548/EEC
<input type="checkbox"/> Testing proposal	<input type="checkbox"/> Existing Substances Regulation 793/93/EEC
<input type="checkbox"/> Annex VI (CLP)	<input type="checkbox"/> Plant Protection Products Regulation 91/414/EEC
<input type="checkbox"/> Annex XV (SVHC)	<input type="checkbox"/> Biocidal Products Directive 98/8/EEC
<input type="checkbox"/> Annex XIV (Authorisation)	<input type="checkbox"/> Other (provide further details below)
<input type="checkbox"/> Annex XVII (Restriction)	
Aluminium chloride basic is not evaluated under another regulatory program that may affect suitability for SEv.	

4.5 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 type="checkbox"/> Information on ecotoxicological properties	<input checked="" type="checkbox"/> Information on uses
<input type="checkbox"/> Information on ED potential	<input type="checkbox"/> Other (provide further details below)
Main concerns are identified on the toxicological properties but it is not excluded that SEv may raise a need of information on additional issues.	

4.6 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)
Depending on the outcome of SEv, additional information may be requested or the need for a RMM may be concluded.			

² Health Council of the Netherlands. Aluminium and aluminium compounds - Evaluation of the effects on reproduction, recommendation for classification. The Hague: Health Council of the Netherlands, 2009; publication no. 2009/02OSH. ISBN 978-90-5549-756-0.
<http://www.gezondheidsraad.nl/en/publications/healthy-working-conditions/aluminium-and-aluminium-compounds-evaluation-effects-reprodu>