

## Justification for the selection of a substance for CoRAP inclusion

**Substance Name (Public Name):** bis(nonafluorobutyl)phosphinic acid  
**Chemical Group:**  
**EC Number:** 700-183-3  
**CAS Number:** 52299-25-9  
**Submitted by:** Germany  
**Date:** 17/03/2015

### 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

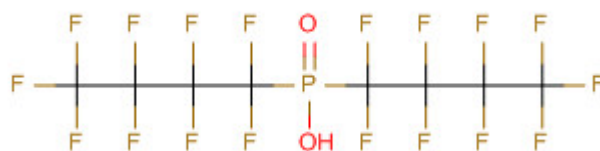
### 1.1 Other identifiers of the substance

Table 1: Substance identity

<b>EC name:</b>	
<b>IUPAC name:</b>	bis(nonafluorobutyl)phosphinic acid
<b>Index number in Annex VI of the CLP Regulation</b>	-
<b>Molecular formula:</b>	C <sub>8</sub> F <sub>18</sub> PO <sub>2</sub> H
<b>Molecular weight or molecular weight range:</b>	502.038 g·mol <sup>-1</sup>
<b>Synonyms/Trade names:</b>	4:2diPFPA

**Type of substance**     Mono-constituent     Multi-constituent     UVCB

**Structural formula:**



### 1.2 Similar substances/grouping possibilities

None.

## 2 CLASSIFICATION AND LABELLING

### 2.1 Harmonised Classification in Annex VI of the CLP

The substance is not listed in Annex VI of the CLP regulation.

### 2.2 Self classification

- In the registration:

Acute Tox. 3	H301
Eye Damage 1	H318

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

There is no notifications to the inventory.

### 2.3 Proposal for Harmonised Classification in Annex VI of the CLP

No proposal for harmonised classification is publically available.

## 3 INFORMATION ON AGGREGATED TONNAGE AND USES

From ECHA dissemination site			
<input checked="" 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 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
The substance is used in industrial and professional settings, e.g. during mixing or blending in batch processes during formulation or preparation of articles, and roller application or brushing.			

## 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 ; Biocidal Product Regulation (Regulation (EU) 528/2012)
<input type="checkbox"/> Annex XIV (Authorisation)	<input type="checkbox"/> Other (provide further details below)
<input type="checkbox"/> Annex XVII (Restriction)	

## 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 <sup>1</sup> <input type="checkbox"/> C <input type="checkbox"/> M <input type="checkbox"/> R	<input type="checkbox"/> Potential endocrine disruptor
<input type="checkbox"/> Sensitiser	<input type="checkbox"/> Suspected Sensitiser <sup>1</sup>	
<input type="checkbox"/> PBT/vPvB	<input checked="" type="checkbox"/> Suspected PBT/vPvB <sup>1</sup>	<input checked="" 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 type="checkbox"/> High (aggregated) tonnage	<input type="checkbox"/> Other (please specify below)

<sup>1</sup> 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

Bis(nonafluorobutyl)phosphinic acid (4:2 diPFPA) is an alternative for PFOA related substances, which have been proposed for restriction (Oct 2014) and therefore increasing use and production of alternatives is expected. Thus, environmental exposure might increase in the future.

The intrinsic properties of 4:2 diPFPA may be of concern. 4:2 diPFPA is stated to be not readily biodegradable. Nevertheless, it is expected that perfluorobutanoic acid (PFBA) will be the final degradation product. No information on bioaccumulation and chronic toxicity are available. For the assessment of the bioaccumulation potential additional information (e.g. protein binding potential) may be required, since other mechanisms for bioaccumulation than log Kow and BCF are of relevance for these per- and polyfluorinated substances.

In addition PFBA is expected to have a high mobility in the environment, which also needs to be assessed, e.g. in terms of its potential for long-range transport.

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

<input type="checkbox"/> Information on toxicological properties	<input type="checkbox"/> Information on physico-chemical properties
<input checked="" type="checkbox"/> Information on fate and behaviour	<input checked="" 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)

Uses, exposure, toxicological properties and ED potential where not target in the manual screening but might be part of the substance evaluation.

Based on a preliminary examination of the available data, information to assess the bioaccumulation potential and the ecotoxicity are required.

In detail, a test on long-term ecotoxicity of 4:2 diPFPA might be requested because of so far missing chronic data.

Additionally, a detailed evaluation of the available data may lead to further information requirements.

#### 5.5 Potential follow-up and link to risk management

<input checked="" type="checkbox"/> Harmonised C&L	<input checked="" type="checkbox"/> Restriction	<input checked="" type="checkbox"/> Authorisation	<input type="checkbox"/> Other (provide further details)
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Depending on the outcome of the substance evaluation, an analysis of Risk Management Options shall be carried out to identify appropriate risk management measures.