

COMMENTS ON AN ANNEX XV DOSSIER FOR IDENTIFICATION OF A SUBSTANCE AS SVHC AND RESPONSES TO THESE COMMENTS

Substance name: Bis(2-(2-methoxyethoxy)ethyl)ether; (Tetraglyme)  
 CAS number: 143-24-8  
 EC number: 205-594-7

The substance is proposed to be identified as meeting the following SVHC criteria set out in Article 57 of the REACH Regulation: Toxic for reproduction (Article 57c)

*Disclaimer: Comments provided during the consultation are made available as submitted by the commenting parties. It was in the commenting parties own responsibility to ensure that their comments do not contain confidential information. The Response to Comments table has been prepared by the competent authority of the Member State preparing the proposal for identification of a substance of very high concern.*

PART I: Comments and responses to comments on the SVHC proposal and its justification

General comments on the SVHC proposal

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses
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Specific comments on the justification

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses
5425 2020/09/25	ANSES, National Authority, France	The harmonised classification Repr 1B-H360FD of 2 bis(2-(2-methoxyethoxy)ethyl) ether (Tetraglyme) fulfils the criteria to identify the substance as an SVHC under article 57(c) and the SVHC identification is supported.	Thank you for the support.

5438 2020/10/13	Health and Environment Alliance (HEAL), International NGO, Belgium	The Health and Environment Alliance (HEAL) thanks Austria for its proposal to list bis(2-(2-methoxyethoxy)ethyl) ether as a substance of very high concern under article 57(c), which we fully support. Because the substance is classified in the hazard class toxic for reproduction category 1B (H360FD: May damage fertility. May damage the unborn child) under the CLP regulation, we consider the proposed SVHC identification to be unequivocal.	Thank you for the support.
5441 2020/10/14	European Environmental Bureau (EEB), International NGO, Belgium	The EEB welcomes the proposal by Austria to identify bis(2-(2-methoxyethoxy)ethyl) ether (tetraglyme) as SVHC based on its classification in the hazard class toxic for reproduction 1b. The substance may damage fertility and may damage the unborn child. The substance should be included in the candidate list and considered for inclusion in Annex XIV to prevent regrettable substitution, taking into account grouping with mono, di and tri glymes. In conclusion, the EEB agrees to the identification of tetraglyme as a substance of very high concern according to article 57(c) of REACH.	Thank you for the support.
5448 2020/10/16	CHEM Trust Europe, National NGO, Germany	CHEM Trust supports the inclusion of bis(2-(2-methoxyethoxy)ethyl) ether (tetraglyme) in the REACH candidate list under article 57.c based on their classification as toxic for reproduction category 1B.	Thank you for the support.
5452 2020/10/16	ChemSec, International NGO, Sweden	ChemSec supports the identification of bis(2-(2-methoxyethoxy)ethyl) ether as SVHC, based on its earlier identification as toxic for reproduction.	Thank you for the support.

## PART II: Comments and responses to comments on uses, exposures, alternatives and risks

## Specific comments on use, exposure, alternatives and risks

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses
5448 2020/10/16	CHEM Trust Europe, National NGO, Germany	<p>Tetraglyme belongs to the group of glycol ethers and it is worrying that the SPIN database indicated its use in consumer preparations. Given the structural similarity tetraglyme might serve as alternative to already regulated low molecular weight glymes with the same technical function.</p> <p>Diglyme has already been included in Annex XIV of REACH, therefore it is important to consider additional regulatory measures in a group approach to avoid replacing one harmful substance with another and minimise the exposure to these reprotoxic substances.</p>	Thank you for sharing our concerns.
5452 2020/10/16	ChemSec, International NGO, Sweden	<p>We also like to specifically mention that alternatives to this and related chemicals are available for many applications. Some examples from the ChemSec marketplace:</p> <p><a href="https://marketplace.chemsec.org/Alternative/Plasma-treatment-with-atmospheric-pressure-for-PTFE-934">https://marketplace.chemsec.org/Alternative/Plasma-treatment-with-atmospheric-pressure-for-PTFE-934</a></p> <p><a href="https://marketplace.chemsec.org/Alternative/Plasma-treatment-in-the-low-pressure-plasma-for-PTFE-etching-928">https://marketplace.chemsec.org/Alternative/Plasma-treatment-in-the-low-pressure-plasma-for-PTFE-etching-928</a></p> <p><a href="https://marketplace.chemsec.org/Alternative/Plasma-activation-for-PTFE-933">https://marketplace.chemsec.org/Alternative/Plasma-activation-for-PTFE-933</a></p> <p><a href="https://marketplace.chemsec.org/Alternative/Low-Pressure-Plasma-System-for-PTFE-932">https://marketplace.chemsec.org/Alternative/Low-Pressure-Plasma-System-for-PTFE-932</a></p> <p><a href="https://marketplace.chemsec.org/Alternative/Plasma-etching-for-PTFE-929">https://marketplace.chemsec.org/Alternative/Plasma-etching-for-PTFE-929</a></p>	Thank you for the information.