

Justification for removing a substance from CoRAP prior to evaluation

Substance Name (public name): Diphenyl(2,4,6-

trimethylbenzoyl)phosphine oxide

EC Number: 278-355-8

CAS Number: 75980-60-8

Authority: Swedish Chemicals Agency

Date: 22/03/2022

The priority for evaluating the substance has been reconsidered based on:

	The initial hazard ground of concern has been verified and considered of low priority
	The initial exposure/risk ground of concern has been verified and considered of low priority
\boxtimes	The generation of information under Substance Evaluation is considered of low priority because
	☑ Already ongoing or implemented regulatory process(es)
	The main concern for Sweden to suggest Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide (TPO) for CoRAP was reprotoxicity. TPO has a harmonised classification as repro 2. The concern was that the classification was not strict enough and the intention was to request studies to elucidate if a classification as repro 1 B was warranted. In addition, there were indications of ED-properties and the substance screened as PBT for terrestrial organisms.
	ECHA performed a compliance check and requested an EOGRTS, a PNDT study and a surface water simulation biodegradation test. The results from these studies confirmed the concern for reprotoxicity. Sweden submitted a CLH proposal 30 June 2020 suggesting classification as skin sens 1B, repro cat 1B for fertility and cat 2 for developmental toxicity. RAC has agreed to the proposal and adopted the opinion at the RAC 58 meeting, 7-16 September 2021. A classification as repro 1B will lead to stricter risk management measures and makes TPO a possible candidate for the candidate list.
	The water simulation study showed that TPO was not persistent and thus not a PBT/vPvB substance. Three major degradation product were formed. One of them, diphenylphosphinous acid, screen for terrestrial bioaccumulation and for one, 2,4,6-trimethylbenzoic acid there is an alert for ED: rtER expert system (USEPA) indicates an alert for potential estrogen receptor-binding.
	These concerns could be followed up in a substance evaluation. This is however of low priority for KemI based on resources constraints.
	☐ Registrants' (voluntary) action addresses concern
	□ Other: