

Assessment of regulatory needs

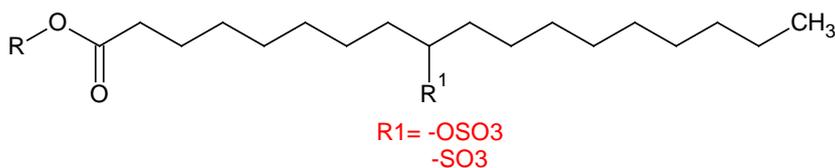
Authority: ECHA

Group Name: Sulfated Sulfonated Fatty Acid Derivatives

General structure:

R= - K+

- Me, ethylene, other esters
- glycerol ester
- amides



Revision history

<i>Version</i>	<i>Date</i>	<i>Description</i>
1.0	9 November 2023	

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Substances within this group:

Subgroup	EC/List no	CAS no	Substance name	Registration type (full, OSII or TII, NONS, cease manufacture), highest tonnage band among all the registrations (t/y) ¹
1	262-996-5	61788-67-8	Fatty acids, vegetable-oil, sulfated, sodium salts	Full, 100-1000
	271-843-1	68609-93-8	9-Octadecenoic acid (Z)-, sulfonated, potassium salts	Full, not (publicly) available
	700-661-1	-	Reaction product of 9-Octadecenoic acid, (Z)-, sulfonated, potassium salts, hydrogen peroxide and sulfuric acid	Full, 10-100
	701-179-4	-	Reaction products of fatty acids, C18 (unsaturated) alkyl with sulfur trioxide, potassium salts	Full, not (publicly) available
	942-903-0	-	Octadecanoic acid, sulfonated, potassium salt	Not registered
2	270-307-4	68424-50-0	Fatty acids, tall-oil, C12-15-alkyl esters, sulfated, sodium salts	Full, not (publicly) available
	276-337-4	72102-30-8	Fatty acids, vegetable-oil, Me Esters, sulfurised	Full, not (publicly) available
	284-965-5	85005-32-9	Fatty acids, C14-22, ethylene esters, bisulfited, sodium salts	Full, not (publicly) available
3	232-306-7	8002-33-3	Castor oil, sulfated	Full, not (publicly) available
	262-992-3	61788-64-5	Oils, fish, sulfated, sodium salts	Full, 100-1000
	263-113-6	61790-19-0	Oils, vegetable, sulfated	Full, > 1000
	269-123-7	68187-76-8	Castor oil, sulfated, sodium salt	Full, 100-1000
	269-124-2	68187-77-9	Castor oil, sulfated, ammonium salt	Full, not (publicly) available
	269-134-7	68187-91-7	Oils, fish, sulfated, ammonium salt	Not registered
	281-976-7	84082-28-0	Rape oil, sulfated, ammonium salt	Full, not (publicly) available
	281-978-8	84082-30-4	Rape oil, sulfated, sodium salt	Full, 100-1000
	293-391-4	91079-06-0	Oils, lard, sulfated, ammonium salts	Not registered
	293-411-1	91079-24-2	Oils, vegetable, sulfated, ammonium salts	C&L notified

¹ The total aggregated tonnage band may be available on ECHA's webpage at <https://echa.europa.eu/information-on-chemicals/registered-substances>

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Subgroup	EC/List no	CAS no	Substance name	Registration type
				(full, OSII or TII, NONS, cease manufacture), highest tonnage band among all the registrations (t/y) ¹
	304-835-4	94279-90-0	Oils, animal, sulfated, sodium salts	Full, 100-1000
	305-979-0	95371-11-2	Oils, animal, sulfonated, sodium salts	Full, > 1000
	307-037-4	97488-98-7	Oils, fish, oxidized, bisulfited, sodium salts	Full, > 1000
	307-044-2	97489-04-8	Oils, vegetable, sulfonated, sodium salts	Full, > 1000
	268-866-4	68153-10-6	Oils, lard, sulfated, sodium salts	C&L notified
	281-977-2	84082-29-1	Rape oil, sulfated, compd. with ethanolamine	C&L notified
	281-975-1	84082-27-9	Rape oil, bisulfited, sodium salt	C&L notified
	293-618-7	91081-16-2	Rape oil, sulfonated, sodium salt	C&L notified
	297-185-5	93348-42-6	Oils, lard, oxidized, sulfited, sodium salts	C&L notified
4	288-505-4	85736-94-3	9-Octadecenamide, N,N-dibutyl-, (Z)-, sulfonated	OSII or TII
	915-926-9	-	Humectol C	Full, 100-1000

This table contains also group members that are only notified under the CLP Regulation, however, the list is not necessarily exhaustive.

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Foreword

The assessment of regulatory needs of a group of substances is an iterative, informal process to help authorities consider the most appropriate way to address an identified concern for a group of substances or a single substance and decide whether further regulatory risk management activities are necessary.

The grouping is mainly based on structural similarity and associations made by the registrants between substances through read-across and category approaches as well as category associations from external sources (e.g. OECD categories)². These methods are different from grouping as defined in Section 1.5 of Annex XI to REACH because the scope and intended use of ECHA's grouping is different. Thus, in this context, grouping does not aim to validate read-across and category approaches according to the Annex XI requirements but rather to support a faster and more consistent approach for regulating chemicals and avoid regrettable substitution.

The focus of the assessment is largely based on information available in the registration dossiers and on properties requiring regulatory risk management action at EU level³. The information reported on uses is from the registration dossiers (IUCLID) and is used as a proxy for assessing how widespread uses are and whether potential for exposure to humans and releases to the environment can be expected. The chemical safety reports are not necessarily consulted and no quantitative exposure assessment is performed at this stage.

The outcome of these assessments are proposals for immediate (the first action) and subsequent regulatory action(s), including the foreseen ultimate regulatory action (last foreseen regulatory action) to address the identified concern(s) in case the potential hazards are confirmed. For example, further data generation through compliance check is suggested as a first action, to confirm the identified hazard.

Where hazards are confirmed, regulatory risk management actions could be considered for the whole group, for a subgroup or for individual substances within the group. The robustness of the group depends on the stage of assessment and the level of certainty this stage requires. For example, the needs for grouping under restriction may differ from the needs for grouping for the purpose of harmonised classification. Group membership is reconsidered accordingly throughout the iterative assessment of regulatory needs, for example, after further information is generated and the hazard has been clarified or when new insights on uses and risks are available.

The assessment of regulatory needs in itself does not represent a regulatory action, but rather a preparatory step to consider further possible regulatory actions at the level of individual substances or groups/subgroups of substances.

² [Working with Groups - ECHA \(europa.eu\)](https://eucha.europa.eu)

³ Regarding hazard properties the focus is for instance on CMR (carcinogenic, mutagenic and/or toxic to reproduction), sensitiser, ED (endocrine disruptor), PBT/VPvB or equivalent (e.g. substances being persistent, mobile and toxic), aquatic toxicity hazard endpoints and therefore only those are reflected in the report. This does not mean that the substances do not have other known or potential hazards. In some specific cases, ECHA may consider additional hazards (e.g. neurotoxicity, STOT RE).

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Publication of ARNs makes it easier for companies to follow the latest status of their substances of interest, anticipate potential regulatory actions and make strategic choices in their chemicals portfolio.

For more information on assessments of regulatory needs please consult ECHA's website⁴.

⁴ <https://echa.europa.eu/understanding-assessment-regulatory-needs>

Glossary

ARN	Assessment of Regulatory Needs
CCH	Compliance Check
CLH	Harmonised classification and labelling
CMR	Carcinogenic, mutagenic and/or toxic to reproduction
DEv	Dossier evaluation
ED	Endocrine disruptor
NONS	Notified new substances
OEL	Occupational exposure limit
OSII or TII	On-site isolated intermediate or transported isolated intermediate
PBT/vPvB	Persistent, bioaccumulative and toxic / very persistent and very bioaccumulative
PMT/vPvM	Persistent, mobile, and toxic / very persistent and very mobile
RDT	Repeated dose toxicity
RMOA	Regulatory management options analysis
RRM	Regulatory risk management
SEv	Substance evaluation
STOT RE	Specific target organ toxicity, repeated exposure
SVHC	Substance of very high concern
TPE	Testing proposal evaluation

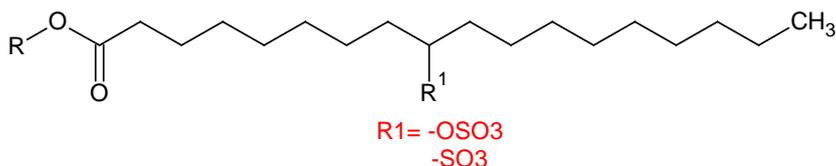
1 Overview of the group

Explanations on the scope of this assessment is available in the foreword to this document. Please read it carefully before going through the report.

ECHA has grouped together structurally similar sulfated or sulfonated fatty acid derivatives. The general structure of the substances is shown in the figure below.

R= - K⁺

- Me, ethylene, other esters
- glycerol ester
- amides



The group includes mainly UVCB substances. The substances have been sub-grouped based on the derivatisation of the carboxylic acid:

- Subgroup 1: sulfated/sulfonated fatty acids and their salts
- Subgroup 2: sulfated/sulfonated/sulfurised fatty acid esters
- Subgroup 3: sulfated/sulfonated animal and vegetable oils (glycerol esters)
- Subgroup 4: sulfated/sulfonated amides

The alkyl chain lengths are in the range C10-C24, originating from the fatty acids/oils/esters starting materials. The alkyl chains are generally linear, predominantly C16 and C18 saturated and C18 unsaturated.

There are 29 substances in the group of which 19 have full and one have intermediate registration, six are C&L notified and three are not registered.

Based on information reported in the REACH registration dossiers, the substances are mainly used as lubricant and surfactant in the leather/textile finishing sector. However, there are other uses reported for some of the substances e.g., cleaning and disinfection products, lubricants, adhesives, paints and coatings and cosmetics.

The substances with full registrations have widespread uses with high exposure potential for both human health and environment (uses by professional workers and consumers). Only three substances, including one registered as intermediate, have uses that are not leading to exposure/releases or where it can be considered negligible (EC 276-337-4, 232-306-7 and 288-505-4).

Despite differences in the chain lengths, it cannot be excluded that there is potential for interchangeability among the substances in the subgroups, especially in subgroup 3, where the structure and origin of the starting materials are similar.

One substance of subgroup 1 (EC 271-843-1) is currently proposed for harmonised classification and labelling (CLH) as Repr. 1B (developmental toxicity). Since List 701-179-4 from subgroup 1 is also self-classified as Repr. 1B, it is hypothesised that a specific structural feature could influence the toxicity. Substances in the other subgroups are expected to be of low toxicity.

2 Conclusions and proposed actions

The conclusions and actions proposed in the table below are based mainly on the REACH and CLP information available at the time of the assessment by ECHA. The conclusions are preliminary suggestions from a screening-level assessment done by ECHA with the aim to propose the next steps for further work (e.g., strengthening of the hazard conclusions, clarification of the uses and/or potential for exposure). The main source of information is the registration dossiers. Relevant public assessments may also be considered. When new information (e.g., on hazards through evaluation processes, or on uses) will become available, the document may be updated, and conclusions and actions revisited.

Table 1: Conclusions and proposed actions

Subgroup name, EC/List no, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Suggested regulatory actions
<p>Subgroup 1</p> <p>271-843-1 9-Octadecenoic acid (Z)-, sulfonated, potassium salts</p> <p>700-661-1 Reaction product of 9-Octadecenoic acid, (Z)-, sulfonated, potassium salts, hydrogen peroxide and sulfuric acid</p> <p>701-179-4 Reaction products of fatty acids, C18 (unsaturated) alkyl with sulfur trioxide, potassium salts</p>	Known or potential hazard for reproductive toxicity	Inconclusive hazard for aquatic toxicity	Widespread consumer and professional uses in cleaning products, biocides, polishes and waxes, air care products, paints, pharmaceuticals, adhesives, and cosmetics as well as in leather, textile and paper and board articles	<p>First step: CCH</p> <p>Potential next steps (if hazard confirmed after data generation): CLH</p> <p>Potential last action: Restriction</p> <p><u>Justification:</u> The reported professional uses are widespread (at many sites and many users) with relatively low levels of operational controls and risk management measures but with</p>

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Subgroup name, EC/List no, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Suggested regulatory actions
942-903-0 Octadecanoic acid, sulfonated, potassium salt				often frequent exposures with a long duration. Restriction of professional uses is preferred over authorisation as it is considered to be more efficient and effective to introduce controls at the level of placing on the market rather than at the level of uses.
262-996-5 Fatty acids, vegetable-oil, sulfated, sodium salts	No hazard or unlikely hazard			First step: CCH
Subgroup 2 270-307-4 Fatty acids, tall-oil, C12-15-alkyl esters, sulfated, sodium salts 276-337-4 Fatty acids, vegetable-oil, Me Esters, sulfurised 284-965-5 Fatty acids, C14-22, ethylene esters, bisulfited, sodium salts		No hazard or unlikely hazard	Industrial uses in metal working fluids and lubricants and article service life in leather articles	Potential last action: Currently no need for EU RRM <u>Justification:</u> Overall, no or unlikely hazard that would lead to concern for the reported uses.
Subgroup 3 232-306-7 Castor oil, sulfated			Widespread consumer and professional uses in paints, leather/textile finishing, lubricants,	

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Subgroup name, EC/List no, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Suggested regulatory actions
262-992-3 Oils, fish, sulfated, sodium salts 263-113-6 Oils, vegetable, sulfated 269-123-7 Castor oil, sulfated, sodium salt 269-124-2 Castor oil, sulfated, ammonium salt 269-134-7 Oils, fish, sulfated, ammonium salt 281-976-7 Rape oil, sulfated, ammonium salt 281-978-8 Rape oil, sulfated, sodium salt 293-391-4 Oils, lard, sulfated, ammonium salts 293-411-1 Oils, vegetable, sulfated, ammonium salts 304-835-4 Oils, animal, sulfated, sodium salts			cleaning products, wood treatment, cosmetics, biocides and pharmaceuticals and article service life in leather, textile and paper and board articles	

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Subgroup name, EC/List no, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Suggested regulatory actions
305-979-0 Oils, animal, sulfonated, sodium salts				
307-037-4 Oils, fish, oxidized, bisulfited, sodium salts				
307-044-2 Oils, vegetable, sulfonated, sodium salts				
268-866-4 Oils, lard, sulfated, sodium salts				
281-977-2 Rape oil, sulfated, compd. with ethanolamine				
281-975-1 Rape oil, bisulfited, sodium salt				
293-618-7 Rape oil, sulfonated, sodium salt				
297-185-5 Oils, lard, oxidized, sulfited, sodium salts				
Subgroup 4			Industrial uses in textile finishing	

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Subgroup name, EC/List no, substance name	Human Health Hazard	Environmental Hazard	Relevant use(s) & exposure potential	Suggested regulatory actions
288-505-4 9-Octadecenamide, N,N-dibutyl-, (Z)-, sulfonated 915-926-9 Humectol C				

3 Justification for the (no) need for regulatory risk management action at EU level (if hazards confirmed)

Suggested regulatory risk management action for the substances in subgroup 1 / excluding substance 'Fatty acids, vegetable-oil, sulfated, sodium salts' (EC 262-996-5) if reproductive toxicity hazard is confirmed

Based on currently available information and considerations of structural similarity and presence of common functional moiety the substances in the subgroup 1 are (potentially) toxic for reproduction.

Substance EC 271-843-1 is currently in the CLH process proposed to be classified as Repr 1B (developmental toxicity) whereas substance List 701-179-4 is self-classified as Repr 1B. Substance List 942-903-0 is not registered but could potentially regrettably substitute the other substances. Substance List 700-661-1 is suspected to be a developmental toxicant because of high structural similarity to the other substances in the subgroup.

In contrary to other substances in the subgroup 1, substance EC 262-996-5 is unlikely to be toxic to reproduction and it could be a substitute for other substances in the subgroup 1.

Substances EC 262-996-5 and EC 271-843-1 have widespread consumer and professional uses in cleaning products, biocides, polishes and waxes, air care products, paints, pharmaceuticals, adhesives, and cosmetics as well as in leather and in paper and board articles. Substance List 700-661-1 has professional uses in cleaning products and List 701-179-4 use in leather and textile articles.

The first step of the regulatory risk management action proposed, should the hazard exist, is the confirmation of hazard via harmonised classification (CLH) as Repr. 1B. When preparing the proposals, it may be considered what would be the best way to develop them, for instance whether to make a proposal for the group of substances, to submit them individually or jointly.

CLH

- i) will require company level risk management measures (RMM) for workers to be in place
- ii) is needed or highly recommended in support of further regulatory processes under REACH
- iii) would lead to generic restriction of the substance(s) in consumer mixtures by means of restriction entry 30.

CLH is also a prerequisite to restrict the presence of the substances in clothing, other textiles, and footwear articles, by means of the restriction entry 72 of REACH Annex XVII (this would require addition of the relevant substances to Appendix 12 by the Commission through Article 68(2)).

CLH will also support regulatory action under other legislations. For instance, in this specific case:

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- harmonised classification as CMR cat. 1 will trigger regulatory action under the Cosmetic products regulation (EC) No 1223/2009, since CMR cat. 1 are restricted by this regulation unless specifically derogated.
- harmonised classification as CMR cat. 1 would render the substances unacceptable co-formulants in biocidal products if present above the concentration limit leading to classification of the mixture as CMR cat 1 according to the Biocidal product regulation (EU) 528/2012.
- harmonised classification as CMR cat.1 will trigger the restriction of use of these substances in toys according to the Toy safety directive (2009/48/EC).

The professional uses in textiles and leather articles, cleaning products, polishes and waxes, adhesives, and biocidal products are expected to be widespread (at many sites and by many users). Professional use is often widespread with relatively low levels of operational controls and risk management measures but with often frequent exposures with a long duration. In addition, professional users may be self-employed and therefore not covered by occupational safety and health (OSH) legislation.

Consumers may be co-exposed to the substances used by professionals in cleaning products, polishes and waxes and adhesives.

Therefore, a **restriction of the substances as such or in mixtures (concentration limit in mixtures) used by professionals** is suggested after CLH.

Restriction of professional uses is preferred over authorisation as it is considered to be more efficient and effective to introduce controls at the level of placing on the market rather than at the level of uses.

In addition, the use of the most harmful substances by professional workers has been recognised as an area of concern under the European Commission's Chemicals Strategy for Sustainability **Error! Bookmark not defined.** which aims to extend to professional users under REACH the level of protection granted to consumers.

Moreover, potential exposure from articles needs further investigation. The need for restricting substances in articles used by professionals or consumers reported for substance List 701-179-4 should be considered in the context of the restriction of professional uses.

Compliance check is proposed for clarifying hazard of the following group members with active REACH registration: EC 262-996-5, EC 271-843-1, and List 701-179-4.

Currently no need to suggest (further) regulatory risk management actions for the substances in subgroups 2-4

Substances in subgroup 3 have widespread consumer and professional uses in paints, leather/textile finishing, lubricants, cleaning products, wood treatment, cosmetics, biocides and pharmaceuticals and article service life in leather, textile and paper and board articles. The substances in subgroup 2 have industrial uses in metal working fluids and lubricants and article service life in leather articles whereas the only registered substance of subgroup 4 has industrial use in textile finishing.

Substances in subgroups 2, 3 and 4 are likely to be of low toxicological and environmental hazards. Compliance check is proposed for clarifying hazard of the following group members with active REACH registration: EC 263-113-6, 270-307-4, 304-835-4, 307-044-2, and List 915-926-9.

Annex 1: Overview of classifications

Data extracted on 23 January 2023

None of the substances have currently a harmonised classification.

Sub-group	EC/ List No	CAS No	Substance name	Classification in registrations
1	262-996-5	61788-67-8	Fatty acids, vegetable-oil, sulfated, sodium salts	Eye Irrit. 2 H319
	271-843-1	68609-93-8	9-Octadecenoic acid (Z)-, sulfonated, potassium salts	Repr. 1B H360 Eye Irrit. 2 H319
	700-661-1	-	Reaction product of 9-Octadecenoic acid, (Z)-, sulfonated, potassium salts, hydrogen peroxide and sulfuric acid	Org. Perox. Type C H242 Skin Corr. 1A H314 Eye Damage 1 H318 Aquatic Acute 1 H400 Aquatic Chronic 1 H410
	701-179-4	-	Reaction products of fatty acids, C18 (unsaturated) alkyl with sulfur trioxide, potassium salts	Repr. 1B H360 Eye Damage 1 H318 Aquatic Chronic 3 H412
	942-903-0	-	Octadecanoic acid, sulfonated, potassium salt	
2	270-307-4	68424-50-0	Fatty acids, tall-oil, C12-15-alkyl esters, sulfated, sodium salts	Aquatic Chronic 3 H412
	276-337-4	72102-30-8	Fatty acids, vegetable-oil, Me esters, sulfurized	-
	284-965-5	85005-32-9	Fatty acids, C14-22, ethylene esters, bisulfited, sodium salts	-
3	232-306-7	8002-33-3	Castor oil, sulfated	-
	262-992-3	61788-64-5	Oils, fish, sulfated, sodium salts	Aquatic Chronic 3 H412
	263-113-6	61790-19-0	Oils, vegetable, sulfated	-
	268-866-4	68153-10-6	Oils, lard, sulfated, sodium salts	-
	269-123-7	68187-76-8	Castor oil, sulfated, sodium salt	Eye Irrit. 2 H319 Aquatic Chronic 3 H412
	269-124-2	68187-77-9	Castor oil, sulfated, ammonium salt	Eye Irrit. 2 H319
	269-134-7	68187-91-7	Oils, fish, sulfated, ammonium salt	-
	281-975-1	84082-27-9	Rape oil, bisulfited, sodium salt	-

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	281-976-7	84082-28-0	Rape oil, sulfated, ammonium salt	-
	281-977-2	84082-29-1	Rape oil, sulfated, compd. with ethanolamine	-
	281-978-8	84082-30-4	Rape oil, sulfated, sodium salt	Eye Damage 1 H318
	293-391-4	91079-06-0	Oils, lard, sulfated, ammonium salts	Eye Damage 1 H318
	293-411-1	91079-24-2	Oils, vegetable, sulfated, ammonium salts	-
	293-618-7	91081-16-2	Rape oil, sulfonated, sodium salt	-
	297-185-5	93348-42-6	Oils, lard, oxidized, sulfited, sodium salts	-
	304-835-4	94279-90-0	Oils, animal, sulfated, sodium salts	-
	305-979-0	95371-11-2	Oils, animal, sulfonated, sodium salts	-
	307-037-4	97488-98-7	Oils, fish, oxidized, bisulfited, sodium salts	-
	307-044-2	97489-04-8	Oils, vegetable, sulfonated, sodium salts	-
4	288-505-4	85736-94-3	9-Octadecenamide, N,N-dibutyl-, (Z)-, sulfonated	-
	915-926-9	-	Humectol C	Skin Irrit. 2 H315 Eye Irrit. 2 H319 Aquatic Chronic 3 H412

Annex 2: Overview of uses based on information available in registration dossiers

Data extracted on 28 April 2020

Subgroup 1

Main types of applications structured by product or article types	262-996-5	271-843-1	700-661-1	701-179-4
Polymer dispersions and dispersion powders	F, I, P, C			F
Textile/leather (finishing/coating) articles	F, I, P, C, (A)			I, A
Adhesives	F, I, P, C	F, I, P		
Biocides	F, I, P, C	F, I, P, C		
Cleaning products	F, I, P, C	F, I, P	F, I, P	
Polishes and Waxes	F, I, P, C	P, C		
Air care products		C		
Laboratory chemicals		P		
Metal surface treatment products	F, I, P, C	I		
Mining chemicals				I
Processing aids/pH regulator	F, I, P			I
Lubricants	F, I			
Fuels	F, I, P, C			
Metal working fluids	F, I			
Paints and coatings; fillers; inks & tonners	F, I, P, C			
Cosmetics	F, C			
Pharmaceuticals	F, I, P, C			
Paper application/article/ paper board and treatment	F, I, A			

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Main types of applications structured by product or article types	262-996-5	271-843-1	700-661-1	701-179-4
Explosives	C			
Polymerisation reactions	F, I, P , C			

F: formulation, I: industrial use, P: professional use, C: consumer use, A: article service life; (A): article service life can be assumed but was not declared by the registrant.

Subgroup 2

Main types of applications structured by product or article types	270-307-4	276-337-4	284-965-5
Leather finishing/coating articles	F, A		F, I, A
Lubricants		F, I	F, I
Metal working fluids		F, I	
Laboratory chemicals		F	

F: formulation, I: industrial use, P: professional use, C: consumer use, A: article service life.

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Subgroup 3

Main types of applications structured by product or article types	232-306-7	262-992-3	262-996-5	263-113-6	269-123-7	269-124-2	269-134-7	281-976-7	281-978-8	293-391-4	293-411-1	304-835-4	305-979-0	307-037-4	307-044-2
Leather/textile (finishing/coating) articles		F, I, A	F, I, P, C, (A)	F, I, C, A	F, I, P, C, A	F, I, (A)	F, I, A	F, I, A	F, I, A	F, I, A	F, I, A	F, I, P, C, A	F, I, C, A	F, I, C, A	F, I, A
Lubricants			F, I		I, P				F, I, P, C			F, I	F, I	I	F, I, C
Fuels			F, I, P, C		I, P, C	F									
Adhesives; Metal/non-metal surface treatment products; Polymer dispersions and dispersion powders; polymerisation reactions			F, I, P, C		I, P, C										
Processing aids / pH regulators		I	F, I, P		I, P, C	F, I									
Cleaning products; polishes and waxes			F, I, P, C		F, I, P, C	F									
Biocides			F, I, P, C		I, P, C	F									
Air care products					C										
Metal working fluids		I, P	I, F		F, I, P, C				F				I	I	I

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Main types of applications structured by product or article types	232-306-7	262-992-3	262-996-5	263-113-6	269-123-7	269-124-2	269-134-7	281-976-7	281-978-8	293-391-4	293-411-1	304-835-4	305-979-0	307-037-4	307-044-2
Paints and coatings; fillers; inks & tonners		I, P, C	F, I, P, C		F, I, P, C	F, I, P		I							
Cosmetics	I		F, C		F, I, P, C	F, C									
Pharmaceuticals			F, I, P, C		I, P, C										
Water treatment agents					I, P										
Paper application/article/ paper board and treatment			F, I, A		F, A										
Explosives			C		C										
Wood treatment					C, (A)	I, P, C, (A)									
Construction chemicals					P, C										
Rubber articles / tyres				I, A											
Base metals and alloys					I	F									
PPP, anti-freeze and de-icing, heat transfer, hydraulic fluids					P										

F: formulation, I: industrial use, P: professional use, C: consumer use, A: article service life, (A): article service life can be assumed but was not declared by the registrant

ASSESSMENT OF REGULATORY NEEDS

Subgroup 4

Main types of applications structured by product or article types	288-505-4	915-926-9
Use in textile finishing		F, I, (A)
Use as intermediate	I	

F: formulation, I: industrial use, P: professional use, C: consumer use, A: article service life, (A): article service life can be assumed but was not declared by the registrant

Annex 3: Overview of completed or ongoing regulatory risk management activities

Data extracted on 12 June 2020.

The substance EC 271-843-1 is in process to be included in Annex VI of CLP. There are no relevant completed or ongoing regulatory risk management activities for any of the other substances in the group.