European Copper Institute
Copper Alliance

ECI COMMENTS TO

CLH REPORT: PROPOSAL FOR HARMONIZED CLASSIFICATION AND LABELLING OF TETRACOPPER HEXAHYDROXIDE SULPHATE [1] : TETRACOPPER HEXAHYDROXIDE SULPHATE HYDRATE [2] ((CU4(OH)6(SO4))

These comments also reflect the considerations of the following task forces and consortium;

European Antifouling Copper Task Force

Wood Preservative Copper Task Force

The European Union Copper Task Force (Plant Protection Products Regulation [PPPR])

Copper Compound Consortium

ABSTRACT

We acknowledge and appreciate the alignment with the copper risk assessment dossier as well as the incorporation of some post risk assessment data.

For most endpoints, the data used and interpretation of the data reflect the hazard profiles agreed in the copper risk assessment report (RAR) and used for other copper compound REACH dossiers.

The proposed revised harmonised classification in the CLH report is considered acceptable;

Acute Tox. 4

Environmental hazard Acute category 1. M factor = 10

Environmental hazard Chronic category 2

1) INTRODUCTION

We appreciate the opportunity to review the CLH report but do regret the significant overlap between the public consultation period and the year-end holidays.

We acknowledge and appreciate the alignment between the CLH report and the copper risk assessment dossier as well as the incorporation of some post risk assessment data.

2) HUMAN HEALTH HAZARDS

No comments.

3) ENVIRONMENTAL HAZARDS

The addition of the **M factor of 10** to the **Acute 1** classification is justified.

It is appreciated that acceptance of the 'rapid removal from the water column' has allowed for the reduction of the classification from **Chronic 1** to **Chronic 2.**

For completeness two attachments on the derivation of the ERV values (Van Sprang and Delbeke, 2010 - Attachment 1) and the comparison of classification with pH and solubility (Attachment 2) have been provided.

4) RELEVANT ATTACHMENTS

Attachment 1: Van Sprang and Delbeke, 2010

Attachment 2: Classification versus solubility of copper compounds and copper flake

CONTACTS

For more information, please contact:

Katrien Delbeke, *Director Health Environment and Sustainable Development*. European Copper Institute, Tervurenlaan 168 b-10. B-1150 Brussels: Tel: +32 2 777 7083, katrien.delbeke@copperalliance.eu

Carol Mackie *Secretariat of the Copper Compound Consortium,* Regulatory Compliance Ltd, 6 Dryden Road, Bilston Glen, Loanhead, Midlothian, EH20 9LZ. Tell: +44(0)131 448 1086, cmackie@regcs.co.uk