

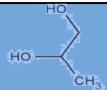
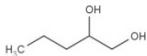
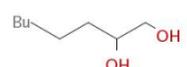
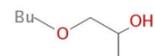
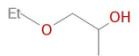
**Harmonised classification and labelling consultation on
propane-1,2-diol (EC N° : 200-338-0, CAS N° 57-55-6)**

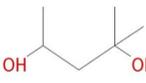
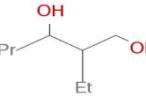
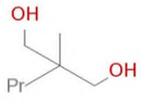
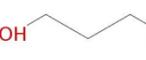
**Annex I to comments submitted on behalf of the Members of
the Electronic Cigarette Industry Platform (eCIP)**

Self-classification and structural analogues

As indicated in our general comments, the third key point considered by the dossier submitter to justify the STOT SE 3 H335 classification of propane-1,2-diol is that “several” notifiers used STOT SE 3 in the self-classification, whereas “the majority of notifiers proposed no self-classification at all.”

In this context we moreover had a look on several ECHA registered substances which we consider close enough to propane-1,2-diol, and thus suitable for grouping strategy approach. The twelve substances are listed in the table below with respect to their classification as STOT SE3 H335.

Substance	CAS	Molecular formula		STOT SE3 H335	STOT SE3 H335 proposals (%)*
Propane-1,2-diol	57-55-6	C3H8O2		STOT SE 3 H335	8/4966 (0.16%)
Ethane-1,2-diol	107-21-1	C2H6O2		no	0/ 5098
Pentane-1,2-diol	5343-92-0	C5H12O2		no	0/638
Octane-1,2-diol	1117-86-8	C8H18O2		no	0/ 359
1-butoxypropan-2-ol	5131-66-8	C7H16O2		no	
propylene glycol monoethyl ether	1569-02-4	C4H10O2		STOT SE 3 H335	3/475 (0.6%)

1-methoxypropan-2-ol	107-98-2	C4H10O2		STOT SE 3 H335	3/ 1681 (0.17%)
Butane-1,3-diol	107-88-0	C4H10O2		STOT SE 3 H335	48/1522 (3%)
2-methylpentane-2,4-diol (hexylene glycol)	107-41-5	C6H14O2		no	0/3735
2-ethylhexane-1,3-diol	94-96-2	C8H18O2		no	0/626
2-methyl-2-propylpropane-1,3-diol	78-26-2	C7H16O2		no	0/12
propane-1,3-diol	504-63-2	C3H8O2		no	0/341
butane-1,2-diol	584-03-2	C4H10O2		no	0/95
* number of notifiers supporting STOT SE3 classification/total number of notifiers					

Of the twelve structural analogues, nine do not have a single notifier supporting STOT SE3 H335. Of the remaining three, butane-1,3-diol is the worst case with still only 3% of notifiers proposing STOT SE3 H335. Overall, the evaluation of the classification data available from the ECHA CLP inventory for propane-1,2-diol (0.16% notifiers supporting STOT SE3 H335) in addition to the evaluation of STOT SE 3 H335 classification data from a series of similar substances, does not provide any supportive evidence that would justify the classification as proposed in the CLH dossier on propane-1,2-diol submitted to ECHA.