

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

**Substance name:** 2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350)

**CAS number:** 36437-37-3

**EC number:** 253-037-1

**The substance is proposed to be identified as meeting the following SVHC criteria set out in Article 57 of the REACH Regulation:** vPvB (Article 57 e)

***Disclaimer:** Comments provided during public 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**

None

**Specific comments on the justification**

<b>Number / Date</b>	<b>Submitted by (name, submitter type, country)</b>	<b>Comment</b>	<b>Response</b>
4497 2015/10/12	Sweden, Member State	The Swedish CA agrees that 2-(2H-Benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350) meets the criteria according to Article 57(e) in REACH and is thus eligible for identification as a substance of very high concern.	Thank you for your support.
4500 2015/10/12	Norway, Member State	The Norwegian CA supports the proposal to identify 2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350) as a substance of very high concern based on its vPvB properties and should be included in the Candidate List.  Concerning monitoring data a screening report from Norway has been published, which includes findings of several UV filters in the environment similar to UV 350 (benzotriazoles UV 327, 328 and 329). <a href="http://www.miljodirektoratet.no/Documents/publikasjoner/M176/M176.pdf">http://www.miljodirektoratet.no/Documents/publikasjoner/M176/M176.pdf</a> These findings support that UV 350 and similar UV substances may	Thank you for the support, the information from the study is already included in Annex I.E of the support document.

		bioaccumulate in organisms.	
4522 2015/10/14	Finland, Member State	<p>2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350) (EC 253-037-1)</p> <p>The Finnish CA supports the proposal to identify the substance as a SVHC according to Article 57 (e) of the REACH regulation (EC) 1907/2006.</p> <p>The conclusion on vP is based on the results of an OECD 308 (transformation in aquatic sediment systems) test on the substance UV-350 itself and read across to structurally similar substances M1, UV-320, UV-327, UV-328. Based on the available information UV-350 fulfils the B (BCF &gt;2000) and vB criterion (BCF &gt;5000) as defined in Sections 1.1.2 and 1.2.2 of REACH Annex XIII.</p> <p>The read across substances UV-320 and UV-328 have been identified as SVHC due to their PBT/vPvB properties according to Article 57 (d) and (e) and therefore have already been included in the candidate list for Authorisation in 2014.</p> <p>Based on the information available, and acknowledging the uncertainties documented in the proposal, it seems possible to conclude that the substance fulfils the vP and vB criteria in Annex XIII to the Regulation.</p> <p>The Finnish CA notes that a Risk Management Option Analysis (RMO) Conclusion Document on substance EC 253-037-1 has been published on the ECHA website. The RMOA conclusion was compiled on the basis of available information and may change in the light of new information or further assessment.</p> <p>The Finnish CA considers that after inclusion of the substance in the candidate list (for eventual inclusion in the Annex XIV) it can still be further explored</p>	<p>Thank you for your support and the assessment of the dossier.</p> <p>We agree to your rationale that the outcome of the risk management option analysis on the most appropriate measure might be reviewed in case new information on the substance becomes available after inclusion on the Candidate List.</p>

		which risk management measures would be the most appropriate.	
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4546 2015/10/15	National NGO, United Kingdom	CHEM Trust supports inclusion of 2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV 350) in the REACH candidate list based on its vPvB properties. The weight of evidence approach was presented in a convincing way according to the relevant parts of REACH Annex XIII.	Thank you for your support.
4553 2015/10/15	ChemSec, International NGO, Sweden	ChemSec supports the identification of UV-350 as an SVHC based on its vPvB properties. The properties have been well demonstrated in the dossier by experimental data and read-across.	Thank you for your support.
4570 2015/10/15	Health and Environment Alliance (HEAL), International NGO, Belgium	We support the nomination of UV-350 to the Candidate List	Thank you for your support.