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

Disclaimer*: Comments provided during the 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.*

Substance name: tris(2-methoxyethoxy)vinylsilane
CAS number: 1067-53-4
EC number: 213-934-0

The substance is proposed to be identified as meeting the following SVHC criteria set out in Article 57 of the REACH Regulation: Toxic for reproduction (Article 57 c)

PART I: Comments and responses to comments on the SVHC proposal and its justification

General comments on the SVHC proposal

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses

Specific comments on the justification

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses
5558 2021/10/05	Health and Environment Alliance (HEAL), International NGO, Belgium	The Health and Environment Alliance (HEAL) thanks Austria for its proposal to identify tris(2-methoxyethoxy)vinylsilane as SVHC under article 57(c) and we fully support this proposal. Considering the existing classification of the substance as toxic to reproduction category 1B (H360FD "May damage fertility"; "May damage the unborn child") under the CLP regulation (regulation 1272/2008), we consider the proposed	Thank you for the support.

		SVHC identification to be unequivocal.	
5566 2021/10/14	Norway, Member State	The Norwegian CA supports that tris(2-methoxyethoxy)vinylsilane should be identified as a substance of very high concern and should be included in the Candidate List.	Thank you for the support.
5569 2021/10/15	Germany, Member State	The German CA supports the identification of EC 213-934-0 as substance of very high concern according to Article 57(c) of REACH	Thank you for the support.
5575 2021/10/16	CHEM Trust Europe, International NGO, Germany	CHEM Trust supports the inclusion of Tris(2-methoxyethoxy)vinylsilane in the REACH candidate list based on its classification as toxic for reproduction category 1B in accordance with Article 57 (c) of REACH.	Thank you for the support.
5582 2021/10/18	Netherlands, Member State	NL supports the proposal to include DBMC in the candidate list of SVHC in accordance with Article 57(c) of Regulation (EC) 1907/2006 (REACH) given the reprotoxic properties of tris(2-methoxyethoxy)vinylsilane itself and its metabolite/hydrolysis product 2-methoxyethanol .	Thank you for the support.
5587 2021/10/18	ChemSec, International NGO, Sweden	ChemSec supports the SVHC identification based on the agreed classification of this substance for being Toxic to Reproduction.	Thank you for the support.
5596 2021/10/18	European Environmental Bureau (EEB), International NGO, Belgium	The EEB welcomes the proposal by Austria to identify tris(2-methoxyethoxy)vinylsilane as SVHC based on its classification in the hazard class toxic for reproduction 1b. The substance may damage fertility and may damage the unborn child. The substance is registered under REACH at 1000 - 10.000 tpa. The substance should be added to the Candidate List and prioritised for further regulatory risk management measures to stimulate substitution by safer alternatives.	Thank you for the support.

PART II: Comments and responses to comments on uses, exposures, alternatives and risks

Specific comments on use, exposure, alternatives and risks

Number / Date	Submitted by (name, submitter type, country)	Comment	Responses
5597 2021/10/18	Company, Germany	Die Gefährlichkeit einer Substanz, bei der ein Molekül bei bestimmungsgemäßem Gebrauch zwei bis drei Moleküle eines teratogenen Spaltalkoholes freisetzt, ist unbestritten. Nur: die Folgen einer Verwendung „harmloserer Alternativen" haben wir bei uns in Form der Ex-Gefährlichkeit des wesentlich leichtflüchtigeren Stoffes VTMO ja selbst im Hause. Es „droht" z. B. ein mögliches 100 jato – VTMO DL Geschäft. Diese Tonnage können wir mangels eigener Investitionen in Explosions-Schutz nicht am Standort fertigen sondern müssten versiertere Marktbegleiter bemühen (Lohnhersteller). Im Bereich Extrusion - kontinuierliches Moisture Curing von PE-Kabelcompounds - ist VTMO wegen seiner leichten Brennbarkeit und schlechten Dosierkonstanz/hohen Verdampfungverlustrate vor ca. 50 -55 Jahren gegen das schwerflüchtigere VTMOEO ausgetauscht worden. Also geben wir für die sozioökonomische Abwägung eines VTMOEO Verbotes der Vollständigkeit halber zu Protokoll: - VTMOEO bietet wegen seines wesentlich höheren Flammpunktes verarbeitungstechnische Sicherheitsreserven, welche die anderen gleich-reaktiven monomeren vinylfunktionellen Organosilane (VTMO, VTEO) NICHT bieten. - In der Vernetzungs-Kondensationsreaktion benötigt man für die Bildung singulärer Disiloxan-Vernetzungsbrücken monomere Vinylsilane. Daher ist auch der Einsatz von VTMO-Oligomeren als Alternative zu monomerem VTMOEO in der PE-Feuchtigkeitsvernetzung chemisch-technisch nicht möglich.	Thank you for your comment regarding possibilities for substitution. It is not directly related to the identification stage of the process, and will only be considered in the next steps of the authorisation process, i.e. the recommendation and authorisation application phases.

		- In toxikologischer Sicht sind auch die „harmloseren" VTMOEO-Alternativen VTMO und VTEO mit ihren Hydrolyseprodukten Methanol oder Ethanol toxikologisch nicht gänzlich unbedenklich. Mit demselben prozesstechnischen Aufwand, mit dem diese leichtflüchtigen Spaltalkohole zurückgehalten werden müssen, kann auch weiterhin der schwerflüchtigere Spaltalkohol 2-Methoxyethanol zurückgehalten werden. - Die Verwendung von VTMOEO ist eine Endverbraucher-ferne. Die Freisetzung und Rückhaltung von 2-Methoxyethanol findet ausschließlich im industriellen Bereich statt.	