



**Substance name: Alkanes, C<sub>10-13</sub>, chloro (SCCPs)**  
**EC number: 287-476-5**  
**CAS number: 85535-84-8**

**JUSTIFICATION FOR THE DRAFT  
RECOMMANDATION OF INCLUSION IN ANNEX XIV**

**14 January 2009**

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## 1. Identity of the substance

Substance name: Alkanes, C<sub>10-13</sub>, chloro  
IUPAC name: Alkanes, C<sub>10-13</sub>, chloro  
EC number: 287-476-5  
CAS number: 85535-84-8

## 2. Intrinsic properties of the substance

Alkanes, C<sub>10-13</sub>, chloro (Short Chain Chlorinated Paraffins, SCCPs) were identified as Substances of Very High Concern (SVHC) according to Articles 57(d) and 57(e) as PBT and vPvB substances and included in the candidate list for authorisation by the ECHA's decision ED/67/2008 on 28 October 2008, after agreement of the Member State Committee.

### Possible route for authorisation:

The substances have PBT and vPvB properties. Consequently, an authorisation may only be granted in accordance with Article 60(4) ('socio-economic route').

## 3. Proposed transitional arrangements

### Proposal:

- *Latest application date:*  
27 months after the entry into force of the Decision to include the substance in Annex XIV
- *Sunset date:*  
45 months after the entry into force of the Decision to include the substance in Annex XIV

### Justification:

#### Complexity of the supply chain:

According to the available information, SCCPs are manufactured at up to 4 sites in the EU and may be imported in low volumes compared to the manufacturing.

SCCPs – which are mainly used as flame retardants or/and as plasticisers, but may also be used as water and chemical resistance enhancers and water-proofing agents - are formulated to different preparations (rubber, paints, sealants). These preparations are either further processed to articles (high density conveyor belts in mines, back-coated textiles) or directly used as end products (sealants, paints).

According to the available information, it is likely that the formulation step involves a limited number of companies. A higher number of article producers and end-users (both industrial and professional) of the articles and preparations containing SCCPs are involved in the supply chains. However, these preparation and articles containing SCCPs are used in a limited number of specialised applications.

In conclusion, according to the available information, actors from a limited number of industries may be affected by the possible authorisation requirement and may need to get involved directly or indirectly in the preparation of applications. However, the actors affected represent different industry sectors and professional user groups.

Hence, based on the available information, it is anticipated that the preparation of application will require a collaborative effort by a number of actors representing different industries, which justifies a somewhat longer period for preparing applications than the minimum.

#### Availability of alternatives:

There appears to be information available on alternative substances to SCCPs for many of uses. Furthermore the available information indicates substitution of SCCPs is already ongoing for some of these uses. Therefore, the available information on potential alternatives facilitates preparing an analysis of alternatives for uses for which actors wish to apply for.

On the other hand, some of the available information on alternatives suggests that the potential applicants may need to assess more complicated situations to conclude whether or not transfer to alternatives is feasible. This may be the the case, for instance, where the alternative substance identified for another use of SCCPs may not offer all the specific functions for which SCCPs have been used so far in these specific applications.

Consequently, the available information indicates that the preparation of the application, in particular the analysis of alternatives and socio-economic assessment, may require, for certain uses, more time. Hence, the available information justifies a somewhat longer period for preparing the application than the minimum.

#### Conclusion

The available information on the complexity of the supply chains and the availability and nature of alternatives provides reasons to propose a somewhat longer time than the minimum for preparing applications.

#### **4. Proposed review periods for certain uses**

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#### **5. Proposed exempted (categories of) uses**

##### Proposal:

To exempt from the authorisation requirement the placing on the market of SCCP in preparation in concentration at or lower than 1 % by weight for a use in metalworking and in fat liquoring of leather.

##### Justification:

The use of SCCP is restricted by Directive 76/769/EEC. This restriction can be found in entry 41 of that Directive as well as in entry 41 of Annex XVII of the REACH Regulation. Annex I of Directive 76/779/EEC permits use of SCCP under the conditions set out below.

Pursuant to entry 41 of Annex I of Directive 76/769/EEC SCCP shall not be placed on the market as a substance on its own or in preparations for use in metalworking or in fat liquoring of leather when the concentration is greater than 1 % by weight. Thus, use of SCCP in these applications in concentrations at or lower than 1 % is permitted.

In light of the fact that such use was already permitted under Directive 76/769 which is legislation imposing minimum requirements relating to the protection of human health, the placing on the market and use of SCCPs in metalworking and in fat liquoring of leather in preparations in concentrations at or lower than 1 % by weight can be exempted from authorisation pursuant to Article 58(2) of the REACH Regulation.