Justification for the selection of a candidate CoRAP substance

Substance Name (Public Name):	Dichloro(dimethyl)silane
Chemical Group:	
EC Number:	200-901-0
CAS Number:	75-78-5
Submitted by:	Ministry of Environment, Czech Republic
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NOTE

This document has been prepared by the evaluating Member State given in the CoRAP update.

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1 IDENTITY OF THE SUBSTANCE

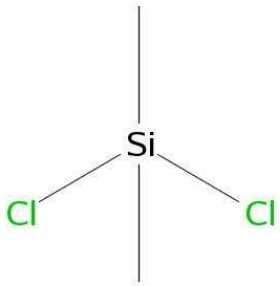
1.1 Name and other identifiers of the substance

Table 1: Substance identity

Public Name:	Dichloro(dimethyl)silane
EC number:	200-901-0
EC name:	Dichloro(dimethyl)silane
CAS number (in the EC inventory):	
CAS number:	75-78-5
CAS name:	Silane, dichlorodimethyl-
IUPAC name:	Dichloro(dimethyl)silane
Index number in Annex VI of the CLP Regulation	014-003-00-X
Molecular formula:	C2H6Cl2Si
Molecular weight or molecular weight range:	129.0605
Synonyms:	-

Type of substance ☒ Mono-constituent ☐ Multi-constituent ☐ UVCB

Structural formula:



2 CLASSIFICATION AND LABELLING

2.1 Harmonised Classification in Annex VI of the CLP

Flam. Liq. 2; H225: Highly flammable liquid and vapour.

Skin Irrit. 2; H315: Causes skin irritation.

Eye Irrit. 2; H319: Causes serious eye irritation.

STOT SE 3; H335: May cause respiratory irritation.

2.2 Proposal for Harmonised Classification in Annex VI of the CLP

None

2.3 Self classification

In the joint submission the registrants states:

"The classification proposal submitted by the Reconsile consortium for this substance deviates from the official EU harmonised classification. The reason for this is that the current harmonised classification as Xi:Irritant underestimates the hazard posed by this substance. Chlorosilanes, based on their potential to release significant amounts of HCl, are expected to be corrosive. This is supported by measured data in laboratory animals and experience in humans."

They give the following self classification for the substance:

CLP:

Flam. Liquid 2; H225: Highly flammable liquid and vapour.

Acute Tox. 4; H302: Harmful if swallowed.

Acute Tox. 3; H331: Toxic if inhaled.

Skin Corr. 1A; H314: Causes severe skin burns and eye damage.

Supplementary hazard statements:

EUH014: Reacts violently with water

EUH071: Corrosive to respiratory tract

DSD:

F; R11: Highly flammable ;

R14: Reacts violently with water.

Xn; R20/22 Harmful by inhalation and if swallowed.

C; R35 Causes severe burns.

Xi; R37 Irritating to respiratory system.

The Classification and Labelling Inventory:

Nearly all other notifications follow the harmonised classification in CLP Annex VI. Two single notifiers include Skin Corr. 1A or 1B; H314, and the following deviations are also given:

Eye Dam. 1; H318: Causes serious eye damage.

Acute Tox. 4; H302: Harmful if swallowed

3 JUSTIFICATION FOR THE SELECTION OF THE CANDIDATE CORAP SUBSTANCE

3.1 Legal basis for the proposal

☒ Article 44(1) (refined prioritisation criteria for substance evaluation)

☐ Article 45(5) (Member State priority)

3.2 Grounds for concern

☐ (Suspected) CMR	☐ Wide dispersive use	☐ Cumulative exposure
☐ (Suspected) Sensitiser	☐ Consumer use	☐ High RCR
☒ (Suspected) PBT	☐ Exposure of sensitive populations	☒ Aggregated tonnage
☐ Suspected endocrine disruptor	☐ Other (provide further details below)	
Lack of data for terrestrial compartment and terrestrial organisms, concern for terrestrial compartment. Lack of data on adsorption/desorption. This applies for both the mother substance and its hydrolysis products (the substance hydrolyses quickly).		

3.3 Information on aggregated tonnage and uses

☐ 1 – 10 tpa	☐ 10 – 100 tpa	☐ 100 – 1000 tpa
☐ 1000 – 10,000 tpa	☐ 10,000 – 100,000 tpa	
☒ 100,000 – 1000,000 tpa	☐ > 1000,000 tpa	
☐ Confidential		

☒ Industrial use	☐ Professional use	☐ Consumer use	☐ Closed System

3.4 Other completed/ongoing regulatory processes that may affect suitability for substance evaluation

☐ Compliance check	☐ Dangerous substances Directive 67/548/EEC
☐ Testing proposal	☐ Existing Substances Regulation 793/93/EEC
☐ Annex VI (CLP)	☐ Plant Protection Products Regulation 91/414/EEC
☐ Annex XV (SVHC)	☐ Biocidal Products Directive 98/8/EEC
☐ Annex XIV (Authorisation)	☐ Other (provide further details below)
☐ Annex XVII (Restriction)	

3.5 Information to be requested to clarify the suspected risk

☐ Information on toxicological properties	☐ Information on physico-chemical properties
☒ Information on fate and behaviour	☒ Information on exposure
☒ Information on ecotoxicological properties	☐ Information on uses
☐ Other (provide further details below)	
Refinement of exposure assessment, justification for release factors from different uses, adsorption to mineral surfaces, terrestrial toxicity	

3.6 Potential follow-up and link to risk management

☐ Restriction	☒ Harmonised C&L	☐ Authorisation	☐ Other (provide further details)
Depending on the outcome of the evaluation harmonized classification and labeling can be proposed			