

Comments and references to responses on ECHA's Draft 6th Recommendation for 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear (EC number: 284-032-2)

The present document compiles the comments received during the public consultation on the draft 6th recommendation for inclusion of substances in Annex XIV of REACH for 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear (EC number: 284-032-2). The public consultation took place between 1 September and 1 December 2014.

For each of the comments there is also a reference to specific section(s) of a document containing the responses to comments ("Response document", available at http://echa.europa.eu/documents/10162/13640/6th_axiv_rec_response_doc_phthalates_en.pdf). The responses in the Response document are arranged by thematic block and level of information (see more detailed explanations at the beginning of that document).

PUBLIC VERSION

CONTENT

I - General comments on the recommendation to include the substance in Annex XIV	1
II - Transitional arrangements. Comments on the proposed dates.....	2
III - Comments on uses that should be exempted from authorisation, including reasons for that	3

I - General comments on the recommendation to include the substance in Annex XIV

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2621 2014/11/25	Germany, Member State	The German CA supports the equal regulatory treatment of all phthalates classified for re-productive toxicity via inclusion in Annex XIV. Although there are currently no registrations for this substance under REACH, it is possible that the substances could be registered at a later date, e.g. as an alternative for phthalates which are	Thank you for your comment.

		already included in Annex XIV.	
2832 2014/11/28	Norway, Member State	In general, the Norwegian REACH CA supports measures to avoid the use of possible harmful substitutes for regulated substances. We therefore support that on the basis of grouping considerations (grouping with phthalate(s) already on Annex XIV), 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear should be prioritised for inclusion in Annex XIV.	Thank you for your comment.
2901 2014/11/30	CO-Gas Safety , International NGO, United Kingdom	Our general comments are that the Reach legislation while a good idea in principal specifically excludes fuels which we know are damaging to health. See http://www.co-gassafety.co.uk/other_toxins.html We would like to know the justification for this. Benzene is particularly dangerous but other products are also dangerous.	A.2.1. Reasoning behind the generic exemption from the authorisation requirement for the use as fuel
2936 2014/11/30	Austrian workers' compensation board, National Authority, Austria	We strongly support that this phthalate enters Annex XIV. The Authorisation for Rolls Royce showed that showing the proof of adequately control is possible. Phtalates with these intrinsic properties shall all be included into Annex XIV. Otherwise an similar dangerous alternative is still possible.	Thank you for your comment.

II - Transitional arrangements. Comments on the proposed dates

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2832 2014/11/28	Norway, Member State	In general, we are in favour that a regulation should enter into force as soon as possible. Hence we are in favour of the shortest LAD slot.	B.1.1. General principles for setting latest application dates / sunset dates: 3. ECHA's proposal for latest application dates

III - Comments on uses that should be exempted from authorisation, including reasons for that

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
2832 2014/11/28	Norway, Member State	The Norwegian CA does not support that any exemptions from the authorisation requirement should be proposed.	Thank you for your comment.
2901 2014/11/30	CO-Gas Safety , International NGO, United Kingdom	Not applicable	