NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

GS Polymer

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (Cwlth) (the Act) and Regulations. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Australian Government Department of Health and Ageing, and conducts the risk assessment for public health and occupational health and safety. The assessment of environmental risk is conducted by the Australian Government Department of Sustainability, Environment, Water, Population and Communities.

For the purposes of subsection 78(1) of the Act, this Public Report may be inspected at our NICNAS office by appointment only at Level 7, 260 Elizabeth Street, Surry Hills NSW 2010.

This Public Report is also available for viewing and downloading from the NICNAS website or available on request, free of charge, by contacting NICNAS. For requests and enquiries please contact the NICNAS Administration Coordinator at:

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Director NICNAS

June 2012

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SUMMARY

The following details will be published in the NICNAS Chemical Gazette:

| ASSESSMENT REFERENCE | APPLICANT(S) | CHEMICAL OR TRADE NAME | HAZARDOUS SUBSTANCE | INTRODUCTION VOLUME | USE |
|-------------------------|-----------------|---------------------------|------------------------|------------------------|-----------------------|
| PLC/1036 | Epson Australia | GS Polymer | No | ≤ 1 tonnes per | Component of printing |
| | Pty Ltd | | | annum | ink |

CONCLUSIONS AND REGULATORY OBLIGATIONS

Human Health Risk Assessment

Based on the assumed low hazard and the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the health of workers and the public.

Environmental Risk Assessment

Based on the assumed low hazard and the assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.

Health and Safety Recommendations

- No specific engineering controls, work practices or personal protective equipment are required
 for the safe use of the notified polymer itself. However, these should be selected on the basis of
 all ingredients in the formulation.
 - Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.
- Service personnel should wear cotton or disposable gloves and ensure adequate ventilation is
 present when removing spent printer cartridges containing the notified polymer and during
 routine maintenance and repairs.
- A copy of the MSDS should be easily accessible to employees.
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the *Approved Criteria for Classifying Hazardous Substances* [NOHSC:1008(2004)], workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.

Environmental Recommendations

• No specific control measures are required to minimise release of the notified polymer to the environment.

Disposal

• The notified polymer should be disposed to landfill.

Emergency Procedures

• Spills and/or accidental release of the notified polymer should be handled by physical containment, collection and subsequent safe disposal.

Secondary Notification

This risk assessment is based on the information available at the time of notification. The Director may call for the reassessment of the polymer under secondary notification provisions based on changes in certain circumstances. Under Section 64 of the *Industrial Chemicals (Notification and Assessment) Act (1989)* the notifier, as well as any other importer or manufacturer of the notified polymer, have post-assessment regulatory obligations to notify NICNAS when any of these circumstances change. These obligations apply even when the notified polymer is listed on the Australian Inventory of Chemical Substances (AICS).

Therefore, the Director of NICNAS must be notified in writing within 28 days by the notifier, other importer or manufacturer:

- (1) Under Section 64(1) of the Act; if
 - the notified polymer is introduced in a chemical form that does not meet the PLC criteria.

or

- (2) Under Section 64(2) of the Act; if
 - the function or use of the notified polymer has changed from a component of printing ink, or is likely to change significantly;
 - the amount of notified polymer being introduced has increased, or is likely to increase, significantly;
 - the notified polymer has begun to be manufactured in Australia;
 - additional information has become available to the person as to an adverse effect of the notified polymer on occupational health and safety, public health, or the environment.

The Director will then decide whether a reassessment (i.e. a secondary notification and assessment) is required.

Material Safety Data Sheet

The MSDS of the product containing the notified polymer was provided by the applicant. The accuracy of the information on the MSDS remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

Epson Australia Pty Limited (ABN 91 002 625 783) 3 Talavera Road NORTH RYDE NSW 2113

Exempt Information (Section 75 of the Act)

Data items and details claimed exempt from publication: chemical name, CAS number, molecular and structural formulae, molecular weight, polymer constituents, residual monomers, use details, import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

GS Polymer

Molecular Weight

Number Average Molecular Weight (Mn) is > 10,000 Da.

3. PLC CRITERIA JUSTIFICATION

| Criterion | Criterion met |
|--|---------------|
| Molecular Weight Requirements | Yes |
| Functional Group Equivalent Weight (FGEW) Requirements | Yes |
| Low Charge Density | Yes |
| Approved Elements Only | Yes |
| Stable Under Normal Conditions of Use | Yes |
| Not Water Absorbing | Yes |
| Not a Hazard Substance or Dangerous Good | Yes |

The notified polymer meets the PLC criteria.

4. PHYSICAL AND CHEMICAL PROPERTIES

Appearance at 20 °C and 101.3 kPa Yellow/brown liquid

Melting Point 15°C

Density $1170 \text{ kg/m}^3 \text{ at } 40^{\circ}\text{C}$

Water Solubility Not determined. Expected to be water dispersible based on

structural considerations.

Reactivity Stable under normal environmental conditions

Degradation Products None under normal conditions of use

5. INTRODUCTION AND USE INFORMATION

Maximum Introduction Volume of Notified Chemical (100%) Over Next 5 Years

| Year | 1 | 2 | 3 | 4 | 5 |
|--------|-----|-----|-----|-----|-----|
| Tonnes | < 1 | < 1 | < 1 | < 1 | < 1 |

Use

The notified polymer will not be manufactured in Australia.

The notified polymer will be imported into Australia at a concentration of $\leq 1\%$ in ink cartridges for use in inkjet printers.

Products containing the notified polymer will not be reformulated in Australia.

6. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were submitted. The notified polymer meets the PLC criteria and is therefore assumed to be of low hazard. The risk of the notified polymer to occupational and public health is not considered to be unreasonable given the assumed low hazard and the assessed use pattern.

7. HUMAN HEALTH RISK ASSESSMENT

No toxicological data were submitted. The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard.

Although not considered in this risk assessment, NICNAS notes that the notified polymer contains residual monomers that are classified as hazardous according to the *Approved Criteria for Classifying Hazardous Substances* [NOHSC: 1008 (2004)]. These are not present in the notified polymer as introduced above the cut off concentrations for classification.

8. ENVIRONMENTAL RISK ASSESSMENT

No ecotoxicological data were submitted. Polymers without significant ionic functionality are generally of low concern to the environment.

The notified polymer will be imported as a component of ink in plastic cartridges for use in inkjet printers. Printer ink cartridges are designed to prevent release of its contents during transport, installation and removal. Accidental spills are expected to be contained and disposed of to landfill. The ink will be used on paper and film articles, and notified polymer bound within the dried ink matrix will share the fate of the article. It is anticipated that approximately half of these articles will be disposed of to landfill and the remainder will be recycled at the end of their useful lifetime. During the recycling process, the ink and hence the notified polymer will be removed and is likely to partition to the solid/sludge waste that is expected to be disposed of to landfill. In landfill the notified polymer will be slowly degraded to form water and oxides of carbon. In the event that small quantities of the notified polymer are released to surface waters as a result of the de-inking process, the notified polymer is not expected to be released at ecotoxicologically significant concentrations. Due to the high molecular weight of the notified polymer, it is not expected to cross biological membranes, and is unlikely to bioaccumulate. Therefore, based on its assumed low hazard and assessed use pattern, the notified polymer is not considered to pose an unreasonable risk to the environment.