NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

NEJI-2

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

July 2012

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Table of Contents

O CIVI	11V1/ XIX 1	_
CON	ICLUSIONS AND REGULATORY OBLIGATIONS	2
ASS]	ESSMENT DETAILS	3
1.	APPLICANT AND NOTIFICATION DETAILS	3
2.	IDENTITY OF POLYMER	3
3.	PLC CRITERIA JUSTIFICATION	3
4.	PHYSICAL AND CHEMICAL PROPERTIES	4
5.	INTRODUCTION AND USE INFORMATION	4
6.	HUMAN HEALTH RISK ASSESSMENT	4
7	ENVIRONMENTAL RISK ASSESSMENT	4

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/1074	Epson Australia	NEJI-2	No	≤5 tonnes per	Component of inkjet
	Pty Ltd			annum	printer 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.
- Service personnel should wear 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.

Disposal

• The notified polymer should be disposed to landfill.

Emergency Procedures

- Prevent from entering into soil, ditches, sewers, waterways and/or groundwater.
- 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 inkjet printer inks, 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 Ltd (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, other names, CAS number, molecular and structural formulae, molecular weight, polymer constituents, residual monomers/impurities, use details, and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

NEJI-2

Molecular Weight

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

3. PLC CRITERIA JUSTIFICATION

Criterion
Molecular Weight Requirements

Criterion met 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 liquid

Melting Point/Glass Transition Temp* < 0°C Density* 1070 kg/m³

Water Solubility Expected to be water dispersible under environmental

conditions based on its use in water-based inks and the

presence of polar sub-units in the notified polymer

Dissociation Constant

The notified polymer is a salt and is expected to dissociate

in water

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	<5	<5	<5

Use

The notified polymer will not be manufactured in Australia. The notified polymer will be imported into Australia in inkjet printer cartridges at a concentration of up to 1%. Products containing the notified polymer will not be reformulated in Australia. The notified polymer will be used as a component of inkjet printer ink at a concentration of up to 1%.

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. ENVIRONMENTAL RISK ASSESSMENT

No ecotoxicological data were submitted. Anionic polymers are known to be moderately toxic to algae. The mode of toxic action is over-chelation of nutrient elements needed by algae for growth. The highest toxicity is when the acid is on alternating carbons of the polymer backbone. This does not apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae. The notified polymer will be imported into Australia as an ingredient of an ink in sealed cartridges, which will be distributed to customers for direct use. Approximately 50% of the paper on which the ink will be printed will be recycled. Most of the notified polymer will reach landfill as a result of disposal of used paper or sludge waste from paper recycling. In landfill the notified polymer will be slowly degraded, eventually forming oxides of carbon and sulphur, water and inorganic salts. The notified polymer is a water dispersible poly-anion and may not be fully recovered by on site waste water treatment at paper recycling facilities. Small quantities of the polymer may therefore be released

^{*} MSDS for product containing notified polymer at <1%.

to surface waters as a result of the de-inking process. However, the notified polymer is not expected to be a toxic hazard to aquatic organisms and has a low potential to bioaccumulate. The notified polymer is therefore not likely to pose an unreasonable risk to the environment based on the reported use pattern.