

**NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME
(NICNAS)**

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in DNT Ink

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (the Act) and Regulations. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Australian Government Department of Health, 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 the Environment.

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**

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PUBLIC REPORT

This assessment report is for an extension of original assessment certificate for polymer in DNT Ink (PLC/1050). Based on the submission of new information by the extension notifier, some sections of the original assessment report for Marubeni Australia Ltd have been modified. These modifications have been made under the heading "Extension Application" in the respective sections.

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
EX/200 (PLC/1050)	Ricoh Australia Pty Ltd	Polymer in DNT Ink	No	≤ 1 tonne per annum	Component of printing inks

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 of to landfill.

Storage

- The following precautions should be taken by workers regarding storage of the notified polymer:
 - Store in a segregated and approved area.
 - Store in original container protected from direct sunlight in a dry, cool and well ventilated area, away from incompatible materials (oxidising substances, strong acids, strong bases).

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 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 SheetOriginal notification

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

Extension Application

The extension applicant has provided an MSDS of the product containing the notified polymer which was reviewed by NICNAS. The accuracy of the information on the MSDS remains the responsibility of the extension applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

Holder of Original Assessment Certificate (LTD/1598)

Marubeni Australia Ltd (ABN 53 000 329 699)
Level 19, 367 Collins Street,
Melbourne VIC 3000

Applicant for an Extension of the Original Assessment Certificate

Ricoh Australia Pty Ltd (ABN 30 000 593 171)
8 Rodborough Road
Frenchs Forest NSW 2086

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/impurities, use details, and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Original Application

Evafanol HA-560
DNT Yellow Ink (contains the notified polymer at < 10% concentration)

Extension Application

Pro Ink PackBlack L4160 (contains the notified polymer at < 10% concentration)

Molecular Weight

Number Average Molecular Weight (Mn) is > 1,000 Da.

Reactive Functional Groups

Functional Group	Category	Equivalent Weight (FGEW)
Amine	High concern	10,727

3. PLC CRITERIA JUSTIFICATION

<i>Criterion</i>	<i>Criterion met</i>
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	White, water based emulsion*
Melting Point/Glass Transition Temp	Not determined. Not isolated from aqueous solution.
Density	1040 kg/m ³ *
Water Solubility	Not determined. The notified polymer is expected to have low water solubility based on its predominantly hydrophobic chemical structure and high molecular weight.
Dissociation Constant	Not determined. The notified polymer is a salt and will be ionised under environmental conditions.
Particle Size	Not applicable
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use

* For an aqueous dispersion of the notified polymer

5. INTRODUCTION AND USE INFORMATION

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

Original application

Year	1	2	3	4	5
Tonnes	100-400	100-400	100-400	100-400	100-400

Extension Application

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

Use

Original application

The notified polymer will be imported into Australia as a component in inkjet printing inks at concentrations up to 10%.

Extension application

The notified polymer will be imported as a component of finished inkjet printing ink formulation at a concentration up to 10%. The ink is packed in foil pouches which will be inserted into cartridges and used in wide-format commercial printers.

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 is unlikely apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae. The notified polymer also contains potentially cationic functionality, however the cationic charge density is low and the notified polymer is therefore not expected to be of concern to the aquatic environment.

The notified polymer will be imported as a component of printer ink in sealed inkjet cartridges. Printing 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 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. Approximately 50% of the paper on which the products will be printed will be recycled. Most of the notified polymer will reach landfill as a result of disposal of used paper and empty cartridges, or sludge waste from paper recycling processes. In landfill the notified polymer is expected to be immobile due to its low solubility in water and will likely undergo slow biotic and abiotic degradation processes to form water and oxides of carbon and nitrogen. The notified polymer is not expected to cross biological membranes due to its high molecular weight and is thus not likely to bioaccumulate. The notified polymer is therefore not expected to pose an unreasonable risk to the environment based on the assessed use pattern.

8. RISK ASSESSMENT FOR EXTENSION APPLICATION

The notified polymer will be imported as a component in finished inkjet printing ink formulation in foil pouches (at a concentration up to 10%), and will not be reformulated in Australia. The use scenario is covered under the original notification (PLC/1050). The proposed use, import volume and fate of the notified polymer will not change significantly under the proposed extension. The circumstances in the extension application are not expected to impact on the original human health and environment risk assessment.