NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in Toner KK-D2

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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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/1273	Kao Australia	Polymer in Toner	No	\leq 50 tonnes per	Component of printer
	Pty Ltd	KK-D2		annum	toner and developer

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.

- A copy of the (M)SDS should be easily accessible to employees.
- If products and mixtures containing the notified polymer are classified as hazardous to health in accordance with the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation should be in operation.

Disposal

• Where reuse or recycling are not appropriate, dispose of the notified polymer in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

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 component of printer toner and developer, 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 (M)SDSs of the notified polymer and a product containing the notified polymer were provided by the applicant. The accuracy of the information on the (M)SDSs remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

Kao Australia Pty Ltd. (ABN: 59 054 708 299)

Level 1, 19-23 Prospect Street

Box Hill, VIC 3128

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, spectral data, polymer constituents, residual monomers/impurities, other names, use details and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Toner KK-D2 (product containing the notified polymer)

Molecular Weight

> 1,000 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 Pale yellow powder

Melting Point/Glass Transition Temp 65-90 °C*

Density $1.15-1.25 \text{ kg/m}^3 \text{ at } 20^{\circ}\text{C}^*$

Water Solubility Insoluble*

Particle Size 915 µm (D50) (Oscillating classifier)

3.6 % by weight is $<150 \mu m$

Reactivity Stable under normal environmental conditions

Degradation Products None under normal conditions of use

*(M)SDS

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	1-10	1-10	1-10	10-50	10-50

Use

The notified polymer will be used as a component of toner and developer for commercial printing machines. The toner will be imported in sealed cartridges at concentrations of <20% and the developer imported in 1L plastic bottles at <5% concentration. No manufacture, reformulation or repackaging will occur in Australia. Used cartridges and empty bottles may be recycled.

6. HUMAN HEALTH RISK ASSESSMENT

The notified polymer meets the PLC criteria and can therefore be considered to be of low hazard. A suspension of the notified polymer was found to be non-mutagenic in a bacterial reverse mutation study carried out using the preincubation method (OECD TG 471).

Although not considered in this risk assessment, NICNAS notes that the notified polymer contains a residual monomer that is classified as hazardous according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia. This is not present in the notified polymer as introduced above the cut off concentration for classification.

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. Polymers without significant ionic functionality are generally of low concern to the environment.

The notified polymer will be imported into Australia as a component of printing toner in sealed cartridges, or developer in plastic bottles, which will be distributed to commercial facilities for printing onto paper substrates. Spills or accidental leaks of the product containing the notified polymer are expected to be vacuum collected and disposed of to landfill. It is assumed that 50% of the printed paper will end up in landfill, and the rest will undergo paper recycling processes. During recycling processes, waster paper is repulped using a variety of chemical agents which, amongst other things, enhance detachment of inks from the fibres. Very little of the notified polymer is expected to partition to the supernatant water, due to its low solubility in water. Based on its high molecular weight and low water solubility, the notified polymer is not expected to cross biological membranes, and is therefore unlikely to bioaccumulate.

All wastes, including container residues, accidental spill waste, and sludge waste from paper recycling, are expected to be disposed of to landfill or by incineration. Based on its high molecular weight and chemical structure, the notified polymer is not expected to be readily biodegradable. In landfill, the notified polymer is expected to eventually degrade by biotic and abiotic processes to form water and oxides of carbon.

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.