

File No PLC/927

November 2010

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

FULL PUBLIC REPORT

Polymer in TN615-Series Toner

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (Cwlth) (the Act) and Regulations. This legislation is an Act of the Commonwealth of Australia. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the 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 Department of Sustainability, Environment, Water, Population and Communities.

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

This Full 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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FULL PUBLIC REPORT**Polymer in TN615-Series Toner****1. APPLICANT AND NOTIFICATION DETAILS**

APPLICANT(S)

Konica Minolta Business Solutions Australia Pty Ltd (ABN: 50 001 065 096)
4 Drake Avenue
Macquarie Park, NSW 2113

NOTIFICATION CATEGORY

Polymer of Low Concern

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.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

No variation to the schedule of data requirements is claimed.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None

NOTIFICATION IN OTHER COUNTRIES

None

2. IDENTITY OF CHEMICAL

MARKETING NAME(S)

Toner TN615Y/M/K/C (<10% notified polymer)

MOLECULAR WEIGHT (MW)

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

REACTIVE FUNCTIONAL GROUPS

The notified polymer contains only low concern functional groups.

3. PLC CRITERIA JUSTIFICATION*Criterion*

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

Criterion met

Yes
Yes
Yes
Yes
Yes
Yes
Yes

The notified polymer meets the PLC criteria.

4. PHYSICAL AND CHEMICAL PROPERTIES

Appearance at 20°C and 101.3 kPa	Colourless solid
Softening Point	ca. 125 °C (for toner)
Density	1200 kg/m ³ at 20 °C
Water Solubility	Not determined. The notified polymer is expected to have very low water solubility.

Dissociation Constant	Not determined. The notified polymer contains functional groups that may be ionised under normal environmental conditions (pH 4-9).
Particle Size	ca. 90 nm; 6 µm particles in toner
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	<10	<10	<50	<50	<50

Use

Component of toner for photocopiers

Mode of Introduction

The notified polymer will be imported as a component of sealed pre-packed toner cartridges (<10% notified polymer) for use in photocopiers. The toner has an average particle size of ca. 6 µm, therefore, the notified polymer will not be introduced with particle sizes in the nanoscale (≤100 nm).

6. HUMAN HEALTH IMPLICATIONS

Hazard Characterisation

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

Occupational Health and Safety Risk Assessment

The notified polymer will not be manufactured or reformulated in Australia. Dermal and inhalation exposure to the notified polymer may occur when replacing spent toner cartridges. However, the toner is only expected to be used in print-room type environments, and trained “key operators” would be responsible for replacing cartridges. In addition, the design of the cartridges is such that exposure to the notified polymer should be low. Once printed onto the paper, the notified polymer is expected to remain bound to the paper, with negligible transfer on dermal contact.

Overall, the OHS risk presented by the notified polymer is expected to be low, based on the minimal exposure to workers and the assumed low hazard of the polymer.

Public Health Risk Assessment

The toner containing the notified polymer is only expected to be used in print-room type environments. The public may come into contact with printed articles. However, once printed onto the paper, the notified polymer is expected to remain bound to the paper, with negligible transfer on dermal contact. Therefore, the risk to public health is not considered to be unacceptable due to the assumed low hazard of the notified polymer and low potential for exposure.

7. ENVIRONMENTAL IMPLICATIONS

Hazard Characterisation

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.

Environmental Risk Assessment

The notified polymer will be imported into Australia as a component of a toner in sealed cartridges, which will be distributed to customers for direct use. Approximately 50% of the paper on which the toner 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 water. The notified polymer is expected to have low water solubility and as it is potentially anionic, it may not be fully recovered by on site waste water treatment at paper recycling facilities. Small quantities of the polymer may therefore be released 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. Due to its high molecular weight, the notified polymer has a low potential to bioaccumulate. The notified polymer is therefore not likely to pose a risk to the environment based on the reported use pattern.

8. CONCLUSIONS AND RECOMMENDATIONS

Human health risk assessment

Under the conditions of the occupational settings described, the notified polymer is not considered to pose an unacceptable risk to the health of workers.

When used in the proposed manner, the notified polymer is not considered to pose an unacceptable risk to public health.

Environmental risk assessment

Based on the reported use pattern, the notified polymer is not considered to pose a risk to the environment.

Recommendations

CONTROL MEASURES

Occupational Health and Safety

- No specific engineering controls, work practices or personal protective equipment are required for the safe use of the notified polymer in sealed toner cartridges. However, these should be selected on the basis of all ingredients in the formulation.
- 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.

Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.

Disposal

- The notified polymer should be disposed of to landfill.

Emergency procedures

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

Regulatory Obligations

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.
 - the notified polymer is introduced with a particle size of 100 nm or less.

or

- (2) Under Section 64(2) of the Act; if
- the function or use of the notified polymer has changed from a component of toner in sealed cartridges for photocopiers 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 or reformulated in Australia;
 - additional information has become available to the person as to an adverse effect of the chemical 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 notified polymer (and products containing the notified polymer) provided by the notifier were reviewed by NICNAS. The accuracy of the information on the MSDS remains the responsibility of the applicant.