NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer in Joncryl® 8055

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

September 2015

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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/1298	BASF Australia	Polymer in Joneryl®	No	≤ 10 tonnes per	Component of inks and
	Ltd	8055		annum	varnishes

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

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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

or

- the notified polymer is introduced in a chemical form that does not meet the PLC criteria;
- (2) Under Section 64(2) of the Act; if
 - the function or use of the notified polymer has changed from a component of inks and varnishes, 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)SDS of products containing the notified polymer was provided by the applicant. The accuracy of the information on the (M)SDS remains the responsibility of the applicant.

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ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

BASF Australia Ltd (ABN: 62 008 437 867)

28 Freshwater Place SOUTHBANK VIC 3006

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 and import volume.

2. IDENTITY OF POLYMER

Marketing Name(s)

Joncryl® 8055 (contains 15-25% notified polymer)

Molecular Weight

Number Average Molecular Weight (Mn) is > 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 Colourless solid Melting Point/Glass Transition Temp 140 - 150 °C

Density $400 - 800 \text{ kg/m}^3 \text{ at } 20 \text{ }^{\circ}\text{C}$

Water Solubility Not determined. Expected to be low based on the

predominantly hydrophobic structure of the notified polymer.

Dissociation Constant Not determined. The notified polymer is a salt and is

expected to be ionised under environmental conditions.

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	1-10	1-10	1-10	1-10	1-10

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Use

The notified polymer will not be manufactured in Australia. The notified polymer will be imported as a component of a formulation (at 15-25% concentration) to be reformulated into water-based inks and overprint varnishes for commercial printing. The final concentration of the notified polymer in inks and varnishes will be $\leq 15\%$.

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 to apply to the notified polymer and it is therefore not considered to be an over-chelation hazard to algae.

The notified polymer will not be manufactured in Australia. It will be formulated into water-based ink and overprint varnishes at reformulation sites where the final concentration of the notified polymer in inks and overprint varnishes is up to 15% by weight. The ink or varnish containing the notified polymer will be applied to the packaging film by a flexographic printing unit. Environmental release of the notified polymer may result from accidental spills, cleaning of equipment and container residues. The collected wastes are expected to be disposed of in accordance with local and national regulations. If disposed of to landfill 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, the notified polymer is not expected to cross biological membranes and is therefore not likely to bioaccumulate. Based on its high molecular weight and chemical structure, the notified polymer is not expected to be readily biodegradable. In landfill the notified polymer will be slowly degraded, eventually forming water and oxides of carbon.

Once the notified polymer as a component of the ink has been cured it is expected to be hydrolytically stable and not readily biodegradable. The ink will be used on paper articles and the 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, waste paper will be repulped using a variety of alkaline dispersing and wetting agents, water emulsifiable organic solvents and bleaches. Aqueous wastes containing these agents are expected to be sent to sewage treatment plants (STPs) for processing. Under a worst case scenario it will be assumed that 50% of the notified polymer will be washed into sewers. Assuming 0% of the notified polymer will be removed *via* absorption to sludge in the STP, the resultant predicted environmental concentration (PEC) in sewage effluent on a nationwide basis is estimated as 4.25 μ g/L [PECriver = 19.23 kg notified polymer/day \div (150 L/person/day \times 22.613 million people) \times 1 (dilution factor)]. The PEC for rivers is well below the EC₅₀ for algae of the most toxic anionic polymers (EC₅₀ > 1 mg/L). In sewage treatment plants, most of the notified polymer is expected to partition to sludge and sediments as it is an anionic polymer and has high molecular weight.

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.