

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

POLYMER OF LOW CONCERN PUBLIC REPORT

S-PM-1009CN

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.

This Public Report is 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:

Street Address: Level 7, 260 Elizabeth Street, SURRY HILLS NSW 2010, AUSTRALIA.
Postal Address: GPO Box 58, SYDNEY NSW 2001, AUSTRALIA.
TEL: + 61 2 8577 8800
FAX: + 61 2 8577 8888
Website: www.nicnas.gov.au

**Director
NICNAS**

April 2016

Table of Contents

SUMMARY	2
CONCLUSIONS AND REGULATORY OBLIGATIONS.....	2
ASSESSMENT DETAILS.....	4
1. APPLICANT AND NOTIFICATION DETAILS.....	4
2. IDENTITY OF POLYMER	4
3. PLC CRITERIA JUSTIFICATION	4
4. PHYSICAL AND CHEMICAL PROPERTIES.....	4
5. INTRODUCTION AND USE INFORMATION	4
6. HUMAN HEALTH RISK ASSESSMENT.....	5
7. ENVIRONMENTAL RISK ASSESSMENT	5

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/1338	Kao Australia Pty Ltd	S-PM-1009CN	No	≤ 10 tonnes per annum	Component of commercial printing 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.

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 containment, physical 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 commercial printing ink, 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 the notified polymer was provided by the applicant. The accuracy of the information on the (M)SDS 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, 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)

S-PM-1009CN

Molecular Weight

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

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 solid
Melting Point/Glass Transition Temp	Not determined
Density	1,180 kg/m ³
Water Solubility	Insoluble
Dissociation Constant	Expected to be ionised under environmental conditions (pH 4-9)
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

<i>Year</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>
Tonnes	≤ 10	≤ 10	≤ 10	≤ 10	≤ 10

Use

The notified polymer will not be manufactured in Australia. It will be imported as a component of a finished ink product used for commercial printing purposes. The imported ink product will be packed in 20 kg plastic bags inside cardboard boxes and directly used from its original packages in large format commercial printers. No reformulation and repackaging will occur.

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.

Although not considered in this risk assessment, NICNAS notes that the notified polymer contains residual monomers that are classified as hazardous according to the *Approved Criteria for Classifying Hazardous Substances* (NOHSC, 2004). However, these are not present in the notified polymer as introduced above the cut off concentrations for classification.

7. ENVIRONMENTAL RISK ASSESSMENT

No ecotoxicological data were submitted. Anionic polymers are generally of low toxicity to fish and daphnia, however they 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, which may apply to the notified polymer. However, the toxicity to algae is likely to be reduced due to the presence of calcium ions in environmental waters, which will bind to the functional groups.

The notified polymer will be imported into Australia as a component of finished printing inks in sealed plastic ink bags, 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 collected using adsorbents and disposed of to landfill in accordance with local government regulations. 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, waste paper is repulped using a variety of chemical agents which, amongst other things, enhance detachment of inks from the fibres. Waste water containing the notified polymer will be released to sewer; during the de-inking process, the cured ink containing the notified polymer is unlikely to be released into supernatant waters based on its low solubility in water. Based on its high molecular weight and anionic properties, up to 50% of the notified polymer is expected to adsorb to sludge and sediment during sewage treatment plant (STP) processes (Boethling and Nabholz, 1997), with sludge eventually disposed of to landfill or re-used for soil remediation. Under a worst case scenario, it is assumed that all of the notified polymer bound to printed paper will enter sewers during recycling processes (i.e. 50% of the import volume), with no removal during STP processes. The resultant predicted environmental concentration (PEC) in sewage effluent on a nationwide basis over 260 working days per year is estimated at 4.25 µg/L [PEC river = 19.23 kg notified polymer/day ÷ (200 L/person/day × 22.613 million people) × 1 (dilution factor)]. The PEC is below the EC50 for algae of the most toxic anionic polymers (EC50 > 1 mg/L). Based on its high molecular weight, the notified polymer in landfill and in surface waters 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 in accordance with local government regulations. 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 and sulphur. 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.