

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

POLYMER OF LOW CONCERN PUBLIC REPORT

Polymer 2 in NeoCryl A-1127

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

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/1073	Reschem Technologies Pty Ltd	Polymer 2 in NeoCrCryl A-1127	No	≤50 tonnes per annum	Component of commercial 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.
- 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 to landfill.

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.
- (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 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 Sheet

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.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

Applicants

Reschem Technologies Pty Ltd (ABN: 90 315 656 219)
Suite 1103/4 Daydream St
Warriewood NSW 2102

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)

Polymer 2 in NeoCryl A-1127 (<40% notified polymer)

Molecular Weight

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

Reactive Functional Groups

The notified polymer contains only low concern functional groups.

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	Yellowish liquid*
Melting Point/Glass Transition Temp	Not determined. Polymer is not isolated from solution.
Density	1050 kg/m ³ at 20 °C*
Water Solubility	Not determined. The notified polymer is a high molecular weight with a predominantly hydrophobic chemical structure and is expected to have low water solubility.
Reactivity	Stable under normal environmental conditions
Degradation Products	None under normal conditions of use
*NeoCryl A-1127 containing the notified polymer at <40%.	

5. INTRODUCTION AND USE INFORMATION

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

Year	1	2	3	4	5
Tonnes	<50	<50	<50	<50	<50

Use

The notified polymer will not be manufactured in Australia. The notified polymer will be imported into Australia at <40% concentration and will be reformulated into commercial printing inks at a concentration of <30%. The notified polymer may also be imported as a component of the finished inks. The printing inks (containing <30% notified polymer) will be used in flexographic or gravure processes and may be used on a variety of plastic films.

6. HUMAN HEALTH RISK ASSESSMENT

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 a solvent solution at a concentration of ≤40 %. The notified polymer will be reformulated into commercial printing inks at ≤30% concentration for plastic articles. It is estimated that ≤3% of the import volume is released as spills, container residues, container and equipment washings and waste material. Solid wastes containing the notified polymer are expected to be disposed of to landfill. The majority of the notified polymer will be bound within the cured printing matrix adhering to plastic film and will share the fate of printed articles. It is anticipated that 75% of these printed articles will be disposed of to landfill and the remainder will be recycled at the end of their useful lifetime. During the recycling process, the ink and hence the notified polymer will be removed and is likely to partition to the solid/sludge waste that

is expected to be disposed of to landfill. In landfill the notified polymer will be slowly degraded to form water and oxides of carbon and nitrogen. In the event that small quantities of the notified polymer are released to surface waters as a result of the de-inking process, the notified polymer is not expected to be released at ecotoxicologically significant concentrations. Due to the high molecular weight of the notified polymer, it is not expected to cross biological membranes, and is unlikely to bioaccumulate. 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.