

Date 9 September 2010
Subject **Letter to all SIEF members for the registration of the substance Methyl Chloride (CAS no. 74-87-3, EC no. 200-817-4) under REACH**

Dear Madam, dear Sir,

This email is addressed to all participants in the Substance Information Exchange Forum (SIEF) for the substance mentioned above.

We informed you earlier, that on the initiative of the major European producers, the *Methyl Chloride REACH Consortium* has been established which covers inter alia the substance methyl chloride under the leadership of *Wacker Chemie AG* who also has the role of Lead Registrant. ReachCentrum acts as the secretariat of the consortium.

1. Progress on the registration dossier

A registration dossier with data on Annex VII-X for registration of >1000 t/a has been finalised. The planned date for the submission of the joint registration dossier by the Lead Registrant is in September 2010 at the latest.

A generic Chemical Safety Report (CSR) has also been prepared which will be available for individual submission.

The final use descriptor & exposure scenario table is available at:

<http://www.reachcentrum.com/EN/consortium-management/consortia-under-reach/methyl-chloride-reach-consortium/methyl-chloride-reach-consortium-dossier.aspx>

Please note that comments/changes on the uses & ES can no longer be taken into account.

2. Classification & labelling proposal

The Substance Profile (Annex 1) comprises now the classification and labelling that the consortium is proposing in agreement with the results of the REACH dossier and previous communication in 2009.

Should you disagree with or have any comment on this, please contact the secretariat **before 17 September 2010 at noon** via mecl@reachcentrum.eu

3. Letter of Access

The consortium will make available the dossier or specific data to other SIEF members with registration obligations via Letters of Access (LoA). The price of the LoAs will be based on the costs of the dossier development, including costs for the right to refer to key studies. Based on the assumption that 1 registrant will buy a full dossier for the first registration deadline (potential registrants for the later registration deadlines have not been taken into account), the **cost for a LoA for a full substance dossier (> 1000 t/a) including a generic CSR is calculated to about 39,500 €**. The costs LoA for an isolated transported intermediate is **calculated to about 24,500 €**.

LoAs for the substance will be available on the ReachCentrum website under the LoA E-Shop (<http://www.reachcentrum.eu/EN/consortium-management/letters-of-access.aspx>) latest **1 October 2010**. It is foreseen, that each legal entity buying a LoA will need to sign a so-called 'SIEF agreement' with the Lead Company during the purchase process with this web-based tool. Please notice, that after 31 October 2010 a timely response and distribution of the token to the co-registrant can not be guaranteed.

4. Responsibilities of individual registrants

Annex 2 of this letter is a reminder of important/main tasks of co-registrants for their individual submission. Please follow also the ECHA guidelines.

Thanks a lot for your kind consideration.
Yours faithfully,

Secretariat of the Chlorinated Solvents REACH Consortium

Annex 1

Substance Profile of methyl chloride

Identification

Substance name: Methyl Chloride
 CAS no.: 74-87-3
 EINECS no.: 200-817-4

Substance Sameness

Mono-constituent substance of > 80 % w/w Chloromethane, including additives (stabilizers).

Substances which are classified by the EU as CMR Cat. 1 or 2, PBT or vPvB or Substances of Very High Concern (SHVC) are not present in amounts > 0.1 % (w/w) each. Substances for which specific concentration limits lower than 0.1 or 1 % (w/w) have been set in Annex VI of Regulation (EC) 1272/2008 (succeeding Directive 67/548/EEC) are not present in amounts that would change the classification and labelling. Substances, for which concentration limits are given in any other EU Directive or Regulation such as the former Marketing and Use Directive 76/769/EEC (now Annex XVII of Regulation (EC) 1272/2008), are not present in amounts exceeding those limits.

Classification & Labelling

a) Harmonised legal C&L

- according to Regulation (EC) 1272/2008, Annex VI, table 3.1:

Classification	Labelling	Notes
Fam. Gas, H220 Press. Gas, H280 Carc. 2, H351 STOT RE 2, H373	Hazard pictogram: - GHS02 (flame) - GHS04 (gas cylinder) - GHS08 (health hazard) Signal word: Danger Hazard statements: - H220: Extremely flammable gas - H280: Contains gas under pressure; may explode if heated - H351: suspected of causing cancer - H373: may cause damage to organs	- Note U

- according to Directive 67/548/EEC Annex I (listed in Regulation (EC) 1272/2008, Annex VI, table 3.2):

Classification	Labelling
F+; R12 Carc. Cat. 3; R40 Xn; R48/20	Indication of danger: - F+ (extremely flammable) - Xn (harmful) Risk phrases: - R12 extremely flammable - R40 limited evidence of a carcinogenic effect. - R48/20 harmful: danger of serious damage to health by prolonged exposure through inhalation Safety phrases: - S2 keep out of the reach of children - S9 - keep container in a well-ventilated place - S16 - keep away from sources of ignition - No smok-

	ing - S33 - take precautionary measures against static discharges
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b) Proposed self C&L in the REACH registration dossier

- according to criteria of Directive 67/548/EEC:

Classification	Labelling
F+; R12 Carc. Cat. 3; R40 Xn; R48/20 Repr. Cat. 3; R62 Repr. Cat. 3; R63	<p>Indication of danger:</p> <ul style="list-style-type: none"> - F+ (extremely flammable) - Xn (harmful) <p>Risk phrases:</p> <ul style="list-style-type: none"> - R12 extremely flammable - R40 limited evidence of a carcinogenic effect. - R48/20 harmful: danger of serious damage to health by prolonged exposure through inhalation - R62 - possible risk of impaired fertility - R63 - possible risk of harm to the unborn child <p>Safety phrases:</p> <ul style="list-style-type: none"> - S2 - keep out of the reach of children - S9 - keep container in a well-ventilated place - S16 - keep away from sources of ignition - No smoking - S33 - take precautionary measures against static discharges - S45 - in case of accident or if you feel unwell, seek medical advice immediately (show the label where possible) - S53 - avoid exposure - obtain special instructions before use

- according to criteria of Regulation (EC) 1272/2008:

Classification	Labelling	Notes
Flam. Gas, H220 Press. Gas, H280 Carc. 2, H351 STOT RE 2, H373 Repr.2, H361	<p>Hazard pictogram:</p> <ul style="list-style-type: none"> - GHS02 (flame) - GHS04 (gas cylinder) - GHS08 (health hazard) <p>Signal word: Danger</p> <p>Hazard statements:</p> <ul style="list-style-type: none"> - H220: Extremely flammable gas - H280: Contains gas under pressure; may explode if heated - H351: suspected of causing cancer - H361: Suspected of damaging fertility or the unborn child <Lesions induced in testes and epididymis, associated effects on reproductive hormones. Heart defects were observed in fetus.> <route of exposure: inhalation>. (H361fd, suspected damage to fertility and to the unborn child by inhalation) - H373: May cause damage to organs (central nervous system, urogenital tract and liver) by inhalation through prolonged or repeated exposure by inhalation. 	- Note U

Annex 2

Responsibilities of individual registrants

1. Check the substance profile and ensure that the substance you produce is in line with it.
2. If you have an impurity classified as CMR in concentration > 0.1 %, or other impurities requiring a different C&L as that mentioned in the substance profile, evaluate the need for an additional evaluation in your company specific dossier.
3. Check the generic exposure scenarios with your downstream users for operational conditions/risk management measures.
4. Perform the analytical tests for substance identification (Annex VI of REACH).
5. Adapt the IUCLID and/or the CSR for your individual company submission.
6. Update your extended Safety Data Sheet (eSDS) before 1 December 2010.
7. Ensure that all is in place for your individual submission to ECHA (registration to REACH-IT, Technical Completeness Check Tool for your individual IUCLID 5.2, quick payment of ECHA invoices)
8. Business rules are critical for successful dossier submission. Check the Cefic tips: http://cefic.org/Files/Publications/Tips-on-Business-rules_v100510.pdf