

Letter to companies having purchased phosphoric acid LoA

Subject: Phosphoric acid workers exposure risk: update of information and recommended precautionary risk management measures

Since submission of the REACH dossier and preparation of the model CSR (both of which you received copies), we have recalculated workers exposure using an updated version of the ECOTOC TRA model. The revised model treats default vapour pressure values differently, and therefore gives modified results for certain endpoints. In particular, a possible inhalation risk for workers handling phosphoric acid (> 25%) for more than one hour is identified. This risk does not appear in most situations if a different model (possibly better adapted to inorganic substances) is used. We are currently reassessing this issue and will submit a spontaneous update of the REACH dossier in early 2011, of which you will receive copy. The costs of the necessary additional work to do this will be taken into account in calculating the adjustment of the final dossier LoA cost (partial reimbursement or additional payment in 2011 as a function of final total costs and number of LoA shares purchased).

We emphasise that in any case the atmospheric concentration of phosphoric acid susceptible to pose risks (DNEL) is higher than the legal occupational exposure level (OEL), so that if legal workplace limits are respected no risk should be incurred.

Nonetheless, and as a precautionary measure, we are writing to request that you systematically implement (if this is not already the case) the following risk management measures for all workers handling phosphoric acid > 85 % and potentially exposed to inhalation: ventilation of workspace, use of appropriate respiratory mask, occupational monitoring.

We also request that you pass on this information to all potentially concerned customers and downstream users.

The model Extended Substance Data Sheet (eSDS) which will be made available in early January 2011 on the IP Consortium website already includes these precautionary risk management measures (see <http://www.reachcentrum.eu/EN/consortium-management/consortia-under-reach/ip-reach-consortium.aspx>)

Yours sincerely

Mark Meesters, ReachCentrum, Inorganic Phosphates Consortium Secretariat
ip@reachcentrum.eu

On behalf of the Lead Company FMC Foret