

# Inorganic Phosphates Consortium Sameness Proposal

## Background information for ALL SUBSTANCES

- *there is no need to reply to this email if you AGREE with the proposal (this is to avoid generating large numbers of unnecessary emails)*
- *if you do NOT agree with the proposals below, of if you have any comment, this must be sent by **DEADLINE 31<sup>st</sup> December 2011** (in order to enable progress with dossier preparation to conform with REACH deadlines)*

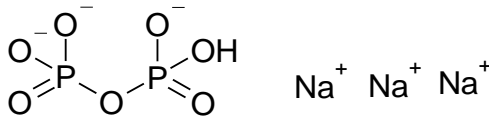
| Definition of substance sameness   |
|--|
| <i>For all IP substances</i>   |
| The Registration Dossier prepared, and in particular the hazard assessments will address the pure substance, but <b>will also cover the substance (as placed on the market) if and only if purity and impurities conform to the levels indicated in each specific proposal.</b>  |
| These ranges of purity / impurities will be specified in the common part of the IUCLID dossier (non-confidential part of the Joint Registration submission, IUCLID \$4 – Physical and chemical properties – Endpoint summary) and for Classified Substances in the Substance Composition section (1.2) of the CSR (a model CSR will be provided by the IP Consortium, but is to be submitted separately by each Registrant)  |
| Each registrant will further have to specify separately the impurities in their own product, in the company-specific (confidential) part of their Registration submission (IUCLID \$1.2).  |
| If a Registrant's substance does not conform to these specifications then the Registrant will have to justify that the differences do not modify the IUCLID 5 (and CSR conclusions for Classified Substances) and do not require a different Classification and Labelling or different exposure scenarios. In this case, this information must be provided in the company specific (confidential) registration dossier, and may result in additional Fees being payable to ECHA. |

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# IP 6: Trisodium hydrogen diphosphate (T3SPP)

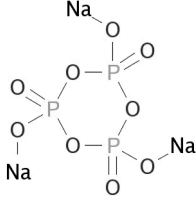
## Substance sameness proposal v5

| Substance identification   |  |                  |
|--|--|------------------|
| Type of substance  | Composition  | mono-constituent |
|  | Origin   | inorganic        |
| Reference EC number (s)  | 238-735-6  |                  |
| Other EC numbers considered to be the same substance   |  |                  |
| EC name  | Trisodium hydrogen diphosphate   |                  |
| Synonyms   | Trisodium pyrophosphate  |                  |
| CAS number (s)   | 14691-80-6, 26573-04-6 (monohydrate), 16457-94-6 (nonahydrate)   |                  |
| SMILES   | OP(=O)([O-])OP(=O)([O-])[O].[Na+].[Na+].[Na+]  |                  |
| EU food legislation number / INS n°  | E450ii   |                  |
| Molecular formula (or formulae)  | H <sub>4</sub> O <sub>7</sub> P <sub>2</sub> .3Na  |                  |
| Structure image or diagram (indicative)  |    |                  |
| Molecular weight (or range)  | 244  |                  |
| Essential substance properties   |  |                  |
| Granulometry range –   | ≥50% of particles have a diameter of <100 µm. Considered to pose an inhalation risk.   |                  |
| pH range for aqueous solution  | pH of 1% solution: pH 6.5-7.5 at 20°C  |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <p>GENERIC COMPOSITION (<i>please provide additional information in fields below if your substance does not conform</i>):</p> <p>Substance &gt;80% purity</p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> <p>All hazardous impurities are &lt; 0.1%</p> |  |                  |
| Purity   | Typical purity of substance  | 93 %             |
|  | Lower content  | 85 %             |
|  | Higher content   | c. 100 %         |
| Impurities in the substance  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b> |                  |
|  | Disodium dihydrogen diphosphate 231-835-0  | < 5 %            |
|  | Tetrasodium diphosphate 231-767-1  | < 5 %            |
|  | Pentasodium triphosphate 231-838-7   | < 5 %            |
|  | Monosodium phosphate 231-449-2   | < 5 %            |
|  | <i>Add additional lines where required</i>   |                  |
| <p><b>All impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</p>  |  |                  |
| <b>Hazardous impurities other than those mentioned above (where applicable)</b>  |  | <0.1%            |

# IP8: Trisodium trimetaphosphate (STMP)

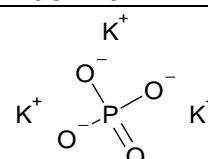
## Substance sameness proposal v5

Comments incorporated in this version: BKG (16/06, 29/08), Budenheim (22/08, 29/08),

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 232-088-3  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | trisodium trimetaphosphate   |                  |
| Synonyms  | sodium trimetaphosphate  |                  |
| CAS number (s)  | 7785-84-4  |                  |
| SMILES  | [O-]P1(=O)OP(=O)(OP(=O)(O1)[O-])[O-].[Na+].[Na+].[Na+]   |                  |
| EU food legislation number / INS n°   |  |                  |
| Molecular formula (or formulae)   | H <sub>3</sub> O <sub>9</sub> P <sub>3</sub> .3Na or O <sub>9</sub> P <sub>3</sub> .3Na  |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 306- 309   |                  |
| Essential substance properties  |  |                  |
| Granulometry range –  | Less than 7% of particles are < 100µm in diameter. Not considered to pose an inhalation risk.  |                  |
| pH range for aqueous solution   | pH of 1% Solution: pH 6.0 – 9.0 at 20.0°C  |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  | Typical purity of substance  | 97.0 %           |
|   | Lower content  | 95.0 %           |
|   | Higher content   | 100 %            |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|   | Sodium tripolyphosphate, STPP ; EINECS 231-838-7   | 0-5%             |
|   |  |                  |
|   | <i>Add additional lines where required</i>   |                  |
|   | <b>All impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

# IP14: Tripotassium orthophosphate (TKP)

## Substance sameness proposal v5

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 231-907-1  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | tripotassium orthophosphate  |                  |
| Synonyms  |  |                  |
| CAS number (s)  | 7778-53-2 (anhydrous), 27176-10-9, 22763-03-7, 22763-02-6, 78436-05-2  |                  |
| SMILES  | [O-]P(=O)([O-])[O-].[K+].[K+].[K+]   |                  |
| EU food legislation number / INS n°   | E340iii  |                  |
| Molecular formula (or formulae)   | H3O4P.3K   |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 214  |                  |
| Essential substance properties  |  |                  |
| Granulometry range –  | More than 50 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.  |                  |
| pH range for aqueous solution   | pH of 1% solution: pH 11.5 – 12.3 at 20°C  |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |                  |
| GENERIC COMPOSITION ( <i>please provide additional information in fields below if your substance does not conform</i> ):  |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  | Typical purity of substance  | 93 %             |
|   | Lower content  | 90 %             |
|   | Higher content   | c. 100 %         |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b> |                  |
|   | Dipotassium orthophosphate, DKP, EINECS number 231-834-5   | < 5 %            |
|   | Dipotassium carbonate, K2CO3, EINECS number 209-529-3  | < 5 %            |
|   | Tetrapotassium pyrophosphate, TKPP, EINECS number 230-785-7  | < 2 %            |
|   | <i>Add additional lines where required</i>   |                  |
| All impurities > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties  |  |                  |
| Hazardous impurities other than those mentioned above (where applicable)  |  | <0.1%            |

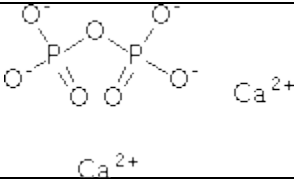
# IP25: Calcium dihydrogenpyrophosphate (CAPP)

## Substance sameness proposal v5

| Substance identification   |  |                  |
|--|--|------------------|
| Type of substance  | Composition  | mono-constituent |
|  | Origin   | inorganic        |
| Reference EC number (s)  | 238-933-2  |                  |
| Other EC numbers considered to be the same substance   |  |                  |
| EC name  | Calcium dihydrogenpyrophosphate  |                  |
| Synonyms   | Calcium Dihydrogen Diphosphate<br>Calcium Acid Pyrophosphate   |                  |
| CAS number (s)   | 14866-19-4   |                  |
| SMILES   | OP(=O)(O)OP(=O)(O)O.[Ca+2]   |                  |
| EU food legislation number / INS n°  | E450vi   |                  |
| Molecular formula (or formulae)  | CaH <sub>2</sub> P <sub>2</sub> O <sub>7</sub> or Ca.H <sub>4</sub> O <sub>7</sub> P <sub>2</sub>  |                  |
| Structure image or diagram (indicative)  |  |                  |
| Molecular weight (or range)  | 216-218  |                  |
| Essential substance properties   |  |                  |
| Granulometry range –   | More than 90 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.  |                  |
| pH range for aqueous suspension  | pH of a 10% suspension: pH 2.5 – 3.5 at 20.0°C   |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <p>GENERIC COMPOSITION (<i>please provide additional information in fields below if your substance does not conform</i>):</p> <p>Substance &gt;80% purity</p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> <p>All hazardous impurities are &lt; 0.1%</p> |  |                  |
| Purity   | Typical purity of substance  | 95 %             |
|  | Lower content  | 90 %             |
|  | Higher content   | c. 100 %         |
| Impurities in the substance  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|  | Monocalcium phosphate 231-837-1  | < 10 %           |
|  |  |                  |
|  | <i>Add additional lines where required</i>   |                  |
|  | <b>All impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|  | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

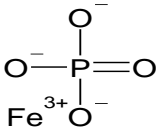
# IP26: Dicalcium pyrophosphate (CPP)

## Substance sameness proposal v5

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 232-221-5  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | Dicalcium pyrophosphate  |                  |
| Synonyms  | calcium pyrophosphate  |                  |
| CAS number (s)  | 790-776-3  |                  |
| SMILES  | [O-]P(=O)([O-])OP(=O)([O-])[O-].[Ca+2].[Ca+2]  |                  |
| EU food legislation number / INS n°   | E450vii  |                  |
| Molecular formula (or formulae)   | Ca <sub>1</sub> /2H <sub>4</sub> O <sub>7</sub> P <sub>2</sub> or Ca <sub>2</sub> O <sub>7</sub> P <sub>2</sub>  |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 254  |                  |
| Essential substance properties  |  |                  |
| Granulometry range –  | More than 99 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.  |                  |
| pH range for aqueous solution   | pH of a 10% aqueous suspension: pH 6.0 – 8.0 at 20.0 ± 0.5°C   |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  | Typical purity of substance  | 98 %             |
|   | Lower content  | 95 %             |
|   | Higher content   | c. 100 %         |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|   | Calcium hydrogenphosphate 231-826-1  | < 5 %            |
|   | <i>Add additional lines where required</i>   |                  |
|   | <b>All impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

# IP27: Iron orthophosphate (FeP)

## Substance sameness proposal v5

| Substance identification   |  |                  |
|--|--|------------------|
| Type of substance  | Composition  | mono-constituent |
|  | Origin   | inorganic        |
| Reference EC number (s)  | 233-149-7  |                  |
| Other EC numbers considered to be the same substance   |  |                  |
| EC name  | Iron orthophosphate  |                  |
| Synonyms   | Ferric (III) orthophosphate  |                  |
| CAS number (s)   | 10045-86-0   |                  |
| SMILES   | [O-]P(=O)([O-])[O-].[Fe+3]   |                  |
| EU food legislation number / INS n°  | N/A  |                  |
| Molecular formula (or formulae)  | Fe.H3O4P   |                  |
| Structure image or diagram (indicative)  |    |                  |
| Molecular weight (or range)  | 154  |                  |
| Essential substance properties   |  |                  |
| Granulometry range –   | More than 99 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.  |                  |
| pH range for aqueous solution  | pH 3.3 to 6 at 20.0 ± 0.5°C  |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <p>GENERIC COMPOSITION (<i>please provide additional information in fields below if your substance does not conform</i>):</p> <p>Substance &gt;80% purity</p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> <p>All hazardous impurities are &lt; 0.1%</p> |  |                  |
| Purity   | Typical purity of substance  | 95 %             |
|  | Lower content  | 90 %             |
|  | Higher content   | c. 100 %         |
| Impurities in the substance  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|  | FeO(OH) Goethite EINECS number: 243-746-4  | <5%              |
|  | Silica (SiO2) EINECS number: 238-878-4   | <6%              |
|  | <i>Add additional lines where required</i>   |                  |
|  | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|  | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

# IP28: Tetrairon tris(pyrophosphate) (FePP)

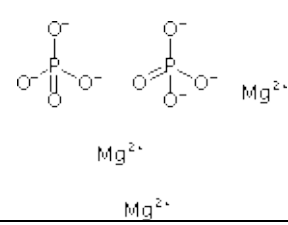
## Substance sameness proposal v5

| Substance identification  |   |                  |
|---|---|------------------|
| Type of substance   | Composition   | mono-constituent |
|   | Origin  | inorganic        |
| Reference EC number (s)   | 233-190-0   |                  |
| Other EC numbers considered to be the same substance  |   |                  |
| EC name   | tetrairon tris(pyrophosphate)   |                  |
| Synonyms  | Ferric (III) pyrophosphate  |                  |
| CAS number (s)  | 10058-44-3  |                  |
| SMILES  | [O-]P(=O)([O-])OP(=O)([O-])[O-].[O-]P(=O)([O-])OP(=O)([O-])[O-].[O-]P(=O)([O-])OP(=O)([O-])[O-].[Fe+3].[Fe+3].[Fe+3].[Fe=3]                       |                  |
| EU food legislation number / INS n°   | N/A   |                  |
| Molecular formula (or formulae)   | Fe <sub>3</sub> /4H <sub>4</sub> O <sub>7</sub> P <sub>2</sub> or Fe <sub>4</sub> O <sub>21</sub> P <sub>6</sub>                                  |                  |
| Structure image or diagram (indicative)   |   |                  |
| Molecular weight (or range)   | 745   |                  |
| Essential substance properties  |   |                  |
| Granulometry range  | More than 99 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.   |                  |
| pH range for aqueous solution   | pH 3.4 to 3.5 at 20.0 ± 0.5°C   |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |   |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |   |                  |
| Substance >80% purity   |   |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |   |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |   |                  |
| All hazardous impurities are < 0.1%   |   |                  |
| Purity  | Typical purity of substance   | 99.5 %           |
|   | Lower content   | 99 %             |
|   | Higher content  | c. 100 %         |
| Impurities in the substance   | The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below : |                  |
|   |   |                  |
|   |   |                  |
|   |   |                  |
|   | <i>Add additional lines where required</i>  |                  |
| All other impurities > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties  |   |                  |
| Hazardous impurities other than those mentioned above (where applicable)  |   | <0.1%            |

# IP30: Trimagnesium bis(orthophosphate) (TMP)

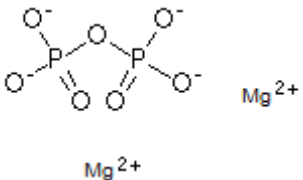
## Substance sameness proposal v5

Comments incorporated in this version: Budenheim (22/08)

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 231-824-0  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | Trimagnesium bis(orthophosphate)   |                  |
| Synonyms  | Trimagnesium phosphate<br>Tribasic magnesium phosphate   |                  |
| CAS number (s)  | 7757-87-1  |                  |
| SMILES  | [O-]P(=O)([O-])[O-].[O-]P(=O)([O-])[O-].[Mg+2].[Mg+2].[Mg+2]   |                  |
| EU food legislation number / INS n°   | INS 343 iii  |                  |
| Molecular formula (or formulae)   | Mg <sub>3</sub> (PO <sub>4</sub> ) <sub>2</sub> or H <sub>3</sub> O <sub>4</sub> P. <sub>3</sub> /2Mg or Mg <sub>3</sub> O <sub>8</sub> P <sub>2</sub>   |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 262  |                  |
| Essential substance properties  |  |                  |
| Granulometry range –  | More than 95 % of particles are < 100µm in diameter. Considered to pose an inhalation risk.  |                  |
| pH range for aqueous solution   | pH 8.2 to 8.8 at 20.0 ± 0.5°C  |                  |
| Purity and impurities   |  |                  |
| <b>(in all cases, expressed as % dry weight, that is excluding water):</b>  |  |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  | Typical purity of substance  | 99 %             |
|   | Lower content  | 95 %             |
|   | Higher content   | c. 100 %         |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b> |                  |
|   | Magnesium hydrogenphosphate 231-823-5  | < 5 %            |
|   | Tricalcium phosphate 215-145-7   | < 2 %            |
|   | Dicalcium phosphate 231-826-1  | < 2 %            |
|   | <i>Add additional lines where required</i>   |                  |
| All other impurities > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties  |  |                  |
| Hazardous impurities other than those mentioned above (where applicable)  |  | <0.1%            |

# IP57: Magnesium pyrophosphate

## Substance sameness proposal v5

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 236-595-0  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | Magnesium pyrophosphate  |                  |
| Synonyms  |  |                  |
| CAS number (s)  | 13446-24-7   |                  |
| SMILES  | [O-]P(=O)([O-])OP(=O)([O-])[O-].[Mg+2].[Mg+2]  |                  |
| EU food legislation number / INS n°   | N/A  |                  |
| Molecular formula (or formulae)   | H4O7P2.2Mg   |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 222-223  |                  |
| Essential substance properties  |  |                  |
| Granulometry range –  | [unknown – no granulometry data available]   |                  |
| pH range for aqueous solution   | pH 7.4 to 7.6 at 20.0 ± 0.5°C  |                  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  |  |                  |
|   | Typical purity of substance  | 95 %             |
|   | Lower content  | 90 %             |
|   | Higher content   | c. 100 %         |
| Impurities in the substance   |  |                  |
| <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>  |  |                  |
|   | Magnesium phosphate  | < 10 %           |
|   |  |                  |
|   | <i>Add additional lines where required</i>   |                  |
|   | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |


# IP34: manganese bis(dihydrogen phosphate) (MMangP)

## Substance sameness proposal v5

| Substance identification  |   |                  |
|---|---|------------------|
| Type of substance   | Composition   | mono-constituent |
|   | Origin  | inorganic        |
| Reference EC number (s)   | 242-520-2   |                  |
| Other EC numbers considered to be the same substance  |   |                  |
| EC name   | Manganese bis(dihydrogen phosphate)   |                  |
| Synonyms  | Monomanganese phosphate<br>Manganese (2+) diphosphate<br>Manganous dihydrogen phosphate<br>Phosphoric acid, manganese (2+) salt (2:1)<br>Mazhef salt<br>Manganese biphosphate<br>Manganese phosphate monobasic<br>Manganese-2-phosphate   |                  |
| CAS number (s)  | 18718-07-5  |                  |
| SMILES  | [O-]P(=O)([O-])[O-].[O-]P(=O)([O-])[O-].[Mn+2]  |                  |
| EU food legislation number / INS n°   | N/A   |                  |
| Molecular formula (or formulae)   | H3O4P.1/2Mn      or<br>MnO8P2            or<br>H4MnO8P2   |                  |
| Structure image or diagram (indicative)   | <p style="text-align: center;">Mn<sup>2+</sup></p> <p style="text-align: center;"> <math>\begin{matrix} \text{O}^- \\   \\ \text{O}=\text{P}-\text{OH} \\   \\ \text{OH} \end{matrix} \quad \begin{matrix} \text{O}^- \\   \\ \text{O}=\text{P}-\text{OH} \\   \\ \text{OH} \end{matrix}</math> </p> <p style="text-align: center;">H<sub>2</sub>O   H<sub>2</sub>O   H<sub>2</sub>O   H<sub>2</sub>O</p> |                  |
| Molecular weight (or range)   | 249 (anhydrous) or 285(dihydrate) or 321(tetrahydrate)  |                  |
| Granulometry range –  | Less than 2% of particles are < 100µm in diameter. Considered not to pose an inhalation risk.   |                  |
| pH range for aqueous solution   | 1% solution: pH 3.0 – 4.0 at 20.0 ± 0.5°C   |                  |
| <b>Purity and impurities</b><br>(in all cases, expressed as % dry weight, that is excluding water):                       |   |                  |
| <b>GENERIC COMPOSITION</b><br>(please provide additional information in fields below if your substance does not conform): |   |                  |
| <b>Purity</b>   | Typical purity of substance   | 99,5 %           |
|   | Lower content   | 99 %             |
|   | Higher content  | c. 100 %         |
| <b>Impurities in the substance</b>  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>  |                  |
|   | Phosphoric acid   | Max 1%           |
|   | <i>Add additional lines where required</i>  |                  |
|   | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties  |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>   | <0.1%            |

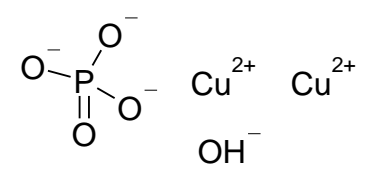
# IP35 (= IP61) : manganese hydrogen phosphate (DmangP)

## Substance sameness proposal v5

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 257-147-0  |                  |
| Other EC numbers considered to be the same substance  | 233-341-0  |                  |
| EC name   | Manganese hydrogen phosphate   |                  |
| Synonyms  | Manganese orthophosphate<br>Manganese (2+) phosphate<br>Manganous phosphate<br>Phosphoric acid, manganese salt<br>Phosphoric acid, manganese salt (1:?)  |                  |
| CAS number (s)  | 51349-94-1 and 10124-54-6  |                  |
| SMILES  | [Mn+2].[O-]P(=O)([O-])[O-]   |                  |
| EU food legislation number / INS n°   |  |                  |
| Molecular formula (or formulae)   | MnO4P or H3O4P.Mn (hydrate)  |                  |
| Structure image or diagram (indicative)   |    |                  |
| Molecular weight (or range)   | 150 (anhydrous) or 186 (dihydrate)   |                  |
| Granulometry range –  | > 80% of particles are < 100µm in diameter.<br>Considered to pose an inhalation risk.  |                  |
| pH range for 1% aqueous solution  | 1% solution: pH 4.0-5.5 at 20.0 ± 0.5°C  |                  |
| <b>Purity and impurities</b><br>(in all cases, expressed as % dry weight, that is excluding water): |  |                  |
| <b>GENERIC COMPOSITION</b>  |  |                  |
| <b>(please provide additional information in fields below if your substance does not conform):</b>  |  |                  |
| <b>Purity</b>   | Typical purity of substance  | 99,5 %           |
|   | Lower content  | 99 %             |
|   | Higher content   | c. 100 %         |
| <b>Impurities in the substance</b>  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|   |  |                  |
|   |  |                  |
|   | <i>Add additional lines where required</i>   |                  |
|   | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

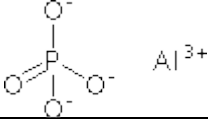
# IP38: Dicopper hydroxide phosphate (CuHP)

## Substance sameness proposal v5

| Substance identification   |  |  |
|--|--|--|
| Type of substance  | Composition  | mono-constituent   |
|  | Origin   | inorganic  |
| Reference EC number (s)  | 235-285-2  |  |
| Other EC numbers considered to be the same substance   |  |  |
| EC name  | Dicopper hydroxide phosphate   |  |
| Synonyms   |  |  |
| CAS number (s)   | 12158-74-6   |  |
| SMILES   | [OH-].[O-]P(=O)([O-])[O-].[Cu+2].[Cu+2]  |  |
| EU food legislation number / INS n°  | N/A  |  |
| Molecular formula (or formulae)  | Cu <sub>2</sub> HO <sub>5</sub> P or Cu <sub>2</sub> HO <sub>5</sub> P   |  |
| Structure image or diagram (indicative)  |    |  |
| Molecular weight (or range)  | 240  |  |
| Granulometry range –   |  |  |
|  |  | More than 90% of particles are < 100µm in diameter. Considered to pose an inhalation risk. |
| pH range for aqueous solution  |  |  |
|  |  | pH 5.3 to 5.7 at 20.0 ± 0.5°C  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):   |  |  |
| <p>GENERIC COMPOSITION (<i>please provide additional information in fields below if your substance does not conform</i>):</p> <p>Substance &gt;80% purity</p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> <p>All hazardous impurities are &lt; 0.1%</p> |  |  |
| Purity   | Typical purity of substance  | 99 %   |
|  | Lower content  | 98 %   |
|  | Higher content   | c. 100 %   |
| Impurities in the substance  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |  |
|  | Copper hydroxide 243-815-9   | < 2 %  |
|  | Tricopper phosphate 232-254-5  | < 2 %  |
|  | <i>Add additional lines where required</i>   |  |
|  | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |  |
| <b>Hazardous impurities other than those mentioned above (where applicable)</b>  |  | <0.1%  |

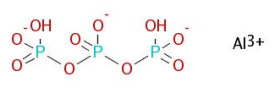
# IP40: aluminium orthophosphate(TALP)

## Substance sameness proposal v5

| Substance identification  |   |   |
|---|---|---|
| Type of substance   | Composition   | mono-constituent  |
|   | Origin  | inorganic   |
| Reference EC number (s)   |   | 232-056-9   |
| Other EC numbers considered to be the same substance  |   |   |
| EC name   |   | Aluminium orthophosphate  |
| Synonyms  |   | Tribasic aluminium phosphate  |
| CAS number (s)  |   | 7784-30-7, 22784-12-9 (trihydrate)  |
| SMILES  |   | [O-]P(=O)([O-])[O-].[Al+3]  |
| EU food legislation number / INS n°   |   | N/A   |
| Molecular formula (or formulae)   |   | Al.H3O4P  |
| Structure image or diagram (indicative)   |   |     |
| Molecular weight (or range)   |   | 125   |
| Granulometry range –  |   |   |
|   |   | Ca. 100% of particles are < 100µm in diameter. Considered to pose an inhalation risk. |
| pH range for aqueous solution   |   |   |
|   |   | pH 4 – 7  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |   |   |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |   |   |
| Substance >80% purity   |   |   |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |   |   |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |   |   |
| All hazardous impurities are < 0.1%   |   |   |
| Purity  | Typical purity of substance   | 98 %  |
|   | Lower content   | 96 %  |
|   | Higher content  | c. 100 %  |
| Impurities in the substance   | The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below : |   |
|   |   |   |
|   |   |   |
|   |   |   |
|   | <i>Add additional lines where required</i>  |   |
| All other impurities > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties  |   |   |
| Hazardous impurities other than those mentioned above (where applicable)  |   | <0.1%   |

# IP41: Aluminium dihydrogen triphosphate (AITPP)

## Substance sameness proposal v5

| Substance identification  |  |  |
|---|--|--|
| Type of substance   | Composition  | mono-constituent   |
|   | Origin   | inorganic  |
| Reference EC number (s)   |  | 237-714-9  |
| Other EC numbers considered to be the same substance  |  |  |
| EC name   |  | Aluminium dihydrogen triphosphate  |
| Synonyms  |  | Aluminium tripolyphosphate   |
| CAS number (s)  |  | 13939-25-8   |
| SMILES  |  | [O-]P(=O)([O-])OP(=O)([O-])OP(=O)([O-])[O-].[Al+3]   |
| EU food legislation number / INS n°   |  |  |
| Molecular formula (or formulae)   |  | Al.H5O10P3 or AlO10P2 <sup>-3</sup>  |
| Structure image or diagram (indicative)   |  |          |
| Molecular weight (or range)   |  | 245  |
| Granulometry range –  |  |  |
|   |  | More than 90% of particles are < 100µm in diameter. Considered to pose an inhalation risk. |
| pH range for aqueous solution   |  |  |
|   |  | pH 4.0 at 20.0 ± 0.5°C   |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |  |
| Substance >80% purity   |  |  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |  |
| All hazardous impurities are < 0.1%   |  |  |
| Purity  | Typical purity of substance  | 99.5 %   |
|   | Lower content  | 99 %   |
|   | Higher content   | c. 100 %   |
| Impurities in the substance   | The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :  |  |
|   | <i>Add additional lines where required</i>   |  |
|   | All other impurities > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |  |
|   | Hazardous impurities other than those mentioned above (where applicable)   | <0.1%  |

# IP43: phosphoric acid, aluminium sodium salt (SALP)

## Substance sameness proposal v5

| Substance identification  |  |  |
|---|--|--|
| Type of substance   | Composition  | mono-constituent   |
|   | Origin   | inorganic  |
| Reference EC number (s)   |  | 232-090-4  |
| Other EC numbers considered to be the same substance  |  |  |
| EC name   |  | Phosphoric acid, aluminium sodium salt   |
| Synonyms  |  | Sodium aluminium phosphate 1:3:8<br>Sodium aluminium phosphate 3:2:8<br>Sodium aluminium phosphate |
| CAS number (s)  |  | 7785-88-8  |
| SMILES  |  | [O-]P(=O)([O-])[O-].[Na+].[Al+3]   |
| EU food legislation number / INS n°   |  | E541   |
| Molecular formula (or formulae)   |  | Al.xH3O4P.xNa  |
| Structure image or diagram (indicative)   |  |  |
| Molecular weight (or range)   |  | Ca. 145  |
| Granulometry range –  |  |  |
|   |  | More than 80% of particles are < 100µm in diameter. Considered to pose an inhalation risk.         |
| pH range for aqueous solution   |  |  |
|   |  | SALP 1:3:8 – pH range: pH 2.0 - 2.7<br>SALP 3:2:8 – pH range: pH 2.4 – 2.8                         |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):  |  |  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |  |
| Substance >80% purity   |  |  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |  |
| All hazardous impurities are < 0.1%   |  |  |
| Purity  | Typical purity of substance  | 95 %   |
|   | Lower content  | 93 %   |
|   | Higher content   | c. 100 %   |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |  |
|   | Sodium aluminium diphosphate 233-680-4   | < 7 %  |
|   |  |  |
|   | <i>Add additional lines where required</i>   |  |
|   | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties |  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%  |

# IP44: boron orthophosphate (BOP)

## Substance sameness proposal v5

| Substance identification   |  |  |
|--|--|--|
| Type of substance  | Composition  | mono-constituent   |
|  | Origin   | inorganic  |
| Reference EC number (s)  |  | 236-337-7  |
| Other EC numbers considered to be the same substance   |  |  |
| EC name  |  | Boron orthophosphate   |
| Synonyms   |  |  |
| CAS number (s)   |  | 13308-51-5   |
| SMILES   |  | B12OP(=O)(O1)O2  |
| EU food legislation number / INS n°  |  | N/A  |
| Molecular formula (or formulae)  |  | BO4P   |
| Structure image or diagram (indicative)  |  |  |
| Molecular weight (or range)  |  | 106  |
| Granulometry range –   |  |  |
|  |  | More than 70% of particles are < 100µm in diameter. Considered to pose an inhalation risk. |
| pH range for aqueous solution  |  |  |
|  |  | pH 3.1 to 3.5 at 20.0 ± 0.5°C  |
| Purity and impurities<br>(in all cases, expressed as % dry weight, that is excluding water):   |  |  |
| <p><b>GENERIC COMPOSITION</b> (please provide additional information in fields below if your substance does not conform):</p> <p>Substance &gt;80% purity</p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> <p>All hazardous impurities are &lt; 0.1%</p> |  |  |
| Purity   | Typical purity of substance  | 98 %   |
|  | Lower content  | 97 %   |
|  | Higher content   | c. 100 %   |
| Impurities in the substance  | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b> |  |
|  | diboron trioxide 215-125-8   | < 3 %  |
|  |  |  |
|  |  |  |
|  | <i>Add additional lines where required</i>   |  |
| <p><b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</p>  |  |  |
| <b>Hazardous impurities other than those mentioned above (where applicable)</b>  |  | <0.1%  |

# IP46: pentapotassium pentasodium bis(triphosphate) (SKTP)

## Substance sameness proposal v5

| Substance identification  |  |                  |
|---|--|------------------|
| Type of substance   | Composition  | mono-constituent |
|   | Origin   | inorganic        |
| Reference EC number (s)   | 246-156-5  |                  |
| Other EC numbers considered to be the same substance  |  |                  |
| EC name   | pentapotassium pentasodium bis(triphosphate)   |                  |
| Synonyms  | Sodium potassium tripolyphosphate  |                  |
| CAS number (s)  | 24315-83-1   |                  |
| SMILES  |  |                  |
| EU food legislation number / INS n°   | N/A  |                  |
| Molecular formula (or formulae)   | (Na.K) <sub>5</sub> P <sub>3</sub> O <sub>10</sub><br>or H <sub>5</sub> O <sub>10</sub> P <sub>3.5</sub> /2K <sub>.5</sub> /2Na or Na <sub>5</sub> K <sub>5</sub> (P <sub>3</sub> O <sub>10</sub> ) <sub>2</sub> (ratios of Na and K may vary) |                  |
| Structure image or diagram (indicative)   |  |                  |
| Molecular weight (or range)   | 816  |                  |
| Granulometry range –  | Ca. 6% of particles are < 100µm in diameter. Considered not to pose an inhalation risk.  |                  |
| pH range for aqueous solution   | pH 9.3 – 10.5  |                  |
| Purity and impurities   |  |                  |
| <b>(in all cases, expressed as % dry weight, that is excluding water):</b>  |  |                  |
| GENERIC COMPOSITION (please provide additional information in fields below if your substance does not conform):   |  |                  |
| Substance >80% purity   |  |                  |
| The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):   |  |                  |
| <ul style="list-style-type: none"> <li>All impurities &gt; 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties</li> </ul> |  |                  |
| All hazardous impurities are < 0.1%   |  |                  |
| Purity  | Typical purity of substance  | 95 %             |
|   | Lower content  | 90 %             |
|   | Higher content   | c. 100 %         |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>   |                  |
|   | Tetrasodium diphosphate 231-767-1  | < 5 %            |
|   | Tetrapotassium diphosphate 230-785-7   | < 5 %            |
|   | <i>Add additional lines where required</i>   |                  |
|   | <b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties         |                  |
|   | <b>Hazardous impurities other than those mentioned above (where applicable)</b>  | <0.1%            |

# IP62: Iron lithium boride phosphate

## Substance sameness proposal v5

| Substance identification  |  |   |
|---|--|---|
| Type of substance   | Composition  | mono-constituent  |
|   | Origin   | inorganic   |
| Reference EC number (s)   |  | Not applicable (New Substance)                            |
| Other EC numbers considered to be the same substance  |  |   |
| EC name   |  | Iron lithium boride phosphate                             |
| Synonyms  |  |   |
| CAS number (s)  |  | 7000375-31-1  |
| SMILES  |  |   |
| EU food legislation number / INS n°   |  | N/A   |
| Molecular formula (or formulae)   |  | Fe <sub>0.95</sub> LiB <sub>0.03</sub> (PO <sub>4</sub> ) |
| Structure image or diagram (indicative)   |  |   |
| Molecular weight (or range)   |  | 158   |
|   |  |   |
| Granulometry range  |  | 100% <100µm (inhalation risk)                             |
| pH range for aqueous solution<br><i>(specify molar concentration/s for pH/s given)</i>  |  | 7.4 (100g/l @ 20°C)                                       |
| Purity and impurities<br><b>(in all cases, expressed as % dry weight, that is excluding water):</b>   |  |   |
| <p><b>GENERIC COMPOSITION</b> <i>(please provide additional information in fields below if your substance does not conform):</i></p> <p>The main impurities are conform to the following limits (in all cases, expressed as % dry weight, that is excluding water):</p> |  |   |
| Purity  | Typical purity of substance  | 97 - 98 %   |
|   | Lower content  | 95 %  |
|   | Higher content   | c. 100 %  |
| Impurities in the substance   | <b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b> |   |
|   | Carbon (as a coating) #CAS 1333-86-4 #EINECS 215-609-9   | < 3 %   |
|   |  |   |
|   |  |   |
| All <b>other impurities</b> > 1% are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties                                     |  |   |
| <b>Hazardous impurities</b>   |  | <0.1%   |