

Date 26 August 2010  
Subject **SIEF COMMUNICATION ON THE REGISTRATION OF THE  
SUBSTANCE HYDROGEN CHLORIDE (CAS no. 7647-01-0,  
EINECS no. 231-595-7) UNDER REACH**

### Update on the progress on the REACH dossier preparation

Dear Madam, Dear Sir,

This e-mail is addressed to all pre-registrants / SIEF members for the substance hydrogen chloride (HCl).

The objective of this communication is to update you on the progress on the preparation of the REACH joint submission dossier by the consortium under the leadership of *Akzo Nobel Industrial Chemicals B.V.*:

It was decided that the Lead Registrant will submit the Chemical Safety Report (CSR) for hydrochloric acid (HCl in aqueous solution) with the joint submission dossier. But to cope with the requirements of future adaptations of company specific uses and confidential company data the CSR will be split into a joint part and a company specific (individual) part.

#### 1. Lead Registrant Submission of the CSR for HCl in aqueous solution

The Lead Registrant will submit

- the joint CSR containing Part B chapters 1, 2.2, 2.3. and 3-10), and
- his own company specific CSR containing Part A & Part B chapters 1.2. and 2.1.

#### 2. Co-Registrant Submission of the CSR for HCl in aqueous solution

Each Co-Registrant needs to submit

- his own company specific CSR containing Part A & Part B chapters 1.2. and 2.1.

Additional individual/confidential information (e.g. confidential uses not included in the joint CSR) may be submitted in the own company specific CSR but in Part B chapters 2.2. (Identified uses), 2.3. (Uses advised against), 3. (Classification & Labelling), 9. (Exposure Assessment), 10. (Risk Characterisation). A recommendation on submission of company specific CSR part A-B is attached.

*If you have to register non-intermediate uses for HCl gas, please contact the secretariat at [hcl@reachcentrum.eu](mailto:hcl@reachcentrum.eu)*

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### 3. Classification & Labelling

The Substance Profile document was updated to the detailed Classification & Labelling (C&L) for HCl gas (without concentration limits) and for hydrochloric acid for all relevant concentrations (> 0.1 %) (see attachment).

The only proposed change from the current legal C&L (CLP regulation (EC) 1272/2008, Annex VI Table 3.1), is the additional GHS classification of hydrochloric acid as 'Metal Corrosive 1' for concentrations  $\geq 0.1$  % leading to pictogram GHS05 and hazard phrase H290 (May be corrosive to metals) for concentrations  $\geq 0.1$  %. A test is under finalization to confirm this result on metal corrosion.

In the joint dossier a test proposal will be included concerning skin and eye irritation / corrosion to determine more precise the concentration limits for these end points. These tests will only be performed after registration upon approval by ECHA.

Should you disagree with or have any comment on this document, please contact the secretariat at [hcl@reachcentrum.eu](mailto:hcl@reachcentrum.eu) **before Friday 27 August 2010, noon CET.**

All documents distributed to the SIEF members for this substance have also been posted on the following web site  
<http://www.eurochlor.org/index.asp?page=779>  
which contains always the latest version of the documents of interest for the SIEF (Substance Profile, List of uses, Generic Exposure Scenarios).

Following ECHA recommendation of 16 April 2010 to the Lead Registrants, the "freeze date" for the HCl dossier was fixed on **31 July 2010**. After that date comments on Substance Profile, Uses List, Generic Exposure Scenarios, SIEF status, data sharing and operational procedures are no longer taken into account.

Thanks a lot for your kind consideration. Yours faithfully,

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