

Salze in Wasser.

Die Frage nach der (Vor)registrierungspflicht von Salzen, die in wässrigen Lösungen z.B. durch Säure-Basereaktionen entstehen, ist zur Zeit nicht geklärt. Die ECHA empfiehlt daher die Salze, die entstehen können, vorzuregistrieren.

Im folgenden Text finden Sie die entsprechende Mitteilung der ECHA an den deutschen Helpdesk

Standard Answer

“The version of the draft guidance document on Annex V, published on the Commission's websites is not a final guidance and still subject to further comments and revision. The draft guidance was handed over to the European Chemicals Agency for further development in cooperation with Member States and relevant stakeholders. The final guidance will be published on the ECHA website.

ECHA's opinion

Following the handing over of the Commission's draft guidance, ECHA currently identified the following issues that remain unresolved on Annex V entry 3. These issues need to be clarified according to the consultation procedure on guidance. The open issues are:

- **“end use”**: The discussion on the term “end use” is not yet finalised. In ECHA's opinion it should be considered whether the term “end use” should only be extended to professionals (e.g. handcrafter) or private consumers or whether the term should be widened to the downstream user, the formulator of a chemical product. Further elaboration is needed in this respect.
- **“substances themselves manufactured”**: The discussion on the term “substances themselves manufactured” is not yet finalised. It should be clarified that a salt formed through neutralisation of an acid and a base in solution is the manufacturing of a different substance whenever after neutralisation the resulting salt is removed from the mixture or placed on the market.

ECHA therefore strongly recommends at this point of discussion to pre-register substances which under the current draft interpretation seem to be exempted. Only pre-registration will provide legal security that manufacturing, placing on the market, and using the substance can continue until the relevant registration deadline, in case of change of the draft guidance.”

ECHA would like to draw the attention to chapter 5.14, page 107 of the Manual of Decisions of the updated version July 2006 (to directive 67/548/EEC) that has been agreed by Member States where it is stated: *“an aqueous, mixture of an acid and a base both of which were reported for EINECS is notifiable if the salt is not listed in EINECS.”* Since the MoD text does not make a difference between salts isolated from the mixture and the ionic pairs which stay in solution ECHA agrees that it should be clarified that the following conditions must be fulfilled for any manufacturer of a solution of salts in water to be exempted from registration provisions for the theoretically formed "new" ionic pairs:

1. The starting salts, acids, bases etc. must be registered
2. None of the salts is removed from the solution

Therefore ECHA is of the opinion that further discussion of these issues is needed. ECHA proposes at this stage to communicate to manufacturers to pre-register substances, for which the exemption rules are still subject to change.