



**Grade name:** Trilead dioxide phosphonate  
**Substance:** Trilead dioxide phosphonate  
**EC Number:** 235-252-2  
**CAS Number:** 12141-20-7  
**Substance Type:** Mono-constituent substance  
**Degree of purity:** > 97.5% (w/w)

**Composition:**

Constituents	Typical concentration	Concentration range	Remarks
Trilead dioxide phosphonate EC no.: 235-252-2	98.5 % (w/w)	> 97.5 — <= 100 % (w/w)	
Constituents	Typical concentration	Concentration range	Remarks
Fatty acids, C16-18 EC no.: 266-928-5	< 2.5 % (w/w)	0 — < 2.5 % (w/w)	
Water EC no.: 231-791-2	< 0.2 % (w/w)	0 — < 0.2 % (w/w)	

**CLASSIFICATION IN ACCORDANCE WITH THE CLASSIFICATION LABELLING AND PACKAGING REGULATION EC (NO) 1272/2008**

Flam. Sol. 1; H228: Flammable solid.

Acute Tox. 4 (oral); H302: Harmful if swallowed.

Acute Tox. 4 (inhalation); H332: Harmful if inhaled.

**†Carc. 2; H351: Suspected of causing cancer.**

Repro. 1A; H360Df: May damage the unborn child. Suspected of damaging fertility.

**†Lact.; H362: May cause harm to breast-fed children.**

**†STOT RE1; H372: Causes damage to organs through prolonged or repeated exposure.**

Aquatic Acute 1; H400: Very toxic to aquatic life.

Aquatic Chronic 1; H410: Very toxic to aquatic life with long lasting effects.

**Specific Concentration Limits, M-Factors**

**SCL:**

Repr. 2; H361f: C ≥ 2.5%

STOT RE 1; H372: C ≥ 0.5%

**M-Factor:**

Aquatic Acute 1: 10

Aquatic Chronic 1: 1

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**† Industry self-classification**

## CLP LABELLING

Signal word: Danger

### Hazard pictograms:

GHS02: flame



GHS07: exclamation mark



GHS08: health hazard



GHS09: environment



### Hazard statements:

H228	Flammable solid.
H302	Harmful if swallowed.
H332	Harmful if inhaled.
<sup>†</sup> H351	<b><i>Suspected of causing cancer.</i></b>
H360Df	May damage the unborn child. Suspected of damaging fertility.
<sup>†</sup> H362	<b><i>May cause harm to breast-fed children.</i></b>
<sup>†</sup> H372	<b><i>Causes damage to central nervous system, blood and kidneys through prolonged or repeated exposure by inhalation or ingestion.</i></b>
H410	Very toxic to aquatic life with long lasting effects.

### Notes:

#### **Industry self-classification explanation<sup>†</sup>**

Trilead dioxide phosphonate is included in Regulation (EC) No 1272/2008 Annex VI Table 3.1 under the entry “lead compounds with the exception of those specified elsewhere in this Annex (Index No 082-001-00-6). As such this entry is legally binding and must there be cited on both the label and SDS. However, for hazard classes not covered by Annex I, the manufacturer or importer is required to self-classify the substance in accordance with the criteria described in the guidance to the DSD. Thus Carc. 2; H351: Suspected of causing cancer is added. In addition, in exceptional circumstances it is possible that potentially harmful levels of lead may be transmitted in breast milk of mothers

exposed to lead to nursing infants. It is therefore proposed that an additional hazard statement “H362: May cause harm to breast-fed children” also be applied for Repro. 1A.

Endpoints marked by a \* in Annex VI, the classification listed constitutes a minimum classification. Therefore based upon supporting data referenced in the REACH registration dossier STOT-RE 2 is changed to STOT-RE 1 as human evidence exists for repeat dose effects on CNS, kidney and haematological (blood) systems. It is proposed that the existing SCL of  $\geq 0.5\%$  is maintained for STOT-RE1.

It should be noted that Industry believes that data are available that support removal of classification Acute Tox. 4 (oral); H302: Harmful if swallowed. Acute Tox. 4 (inhalation); H332: Harmful if inhaled. However, this can only be undertaken by making a proposal to ECHA to be discussed at RAC and the classification officially changed via an Adaption to Technical Progress.

H228: Highly flammable (test results, EU A.10 and ADR 2.2.41.1.8 methods). In the test according to ADR, the burning was not stopped by a moistened zone. The burning rate was between 2.4 and 3 mm/s.

M-Factors have been assigned for both acute and chronic effects to the aquatic environment based upon results of T/dp testing and use of the Unit World Model to evaluate removal of the Pb ion from the water column (as outlined in reports produced by HW Consult).

### **Disclaimer**

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