



**Transfer of  
Substances**

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
NGĀ KAIWHAKATŪPATO WHAKARARU TAIAO



# **Summary of Submissions: Single Component NOTS**

May 2006

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# 1. Introduction

## 1.1 Background to the Consultation

This document reports on the submissions that were received from the consultation on Single Component NOTS. These substances will be transferred on 1 July 2006 under section 160A of the Hazardous Substance and New Organisms (HSNO) Act 1996.

The consultation on single component NOTS was undertaken in two phases. Phase 1 was released for consultation on 16 January 2006 and Phase 2 on 29 March 2006. Consultation closed on 24 February 2006 and 15 May 2006 respectively.<sup>1</sup>

The consultation documents, which set out the proposed classifications and controls for each substance,<sup>2</sup> or a letter advising of the availability of these documents, were provided to approximately 420 parties who were considered likely to have an interest in this consultation. This included companies who notified single component products under the Toxic Substances Act 1979, other industry sectors and associations, government departments, enforcement agencies and territorial authorities. The documentation was also available on the 'consultation page' of the ERMA New Zealand website.

Thirty six submissions were received. These submissions generally centred on the controls or the classifications that had been assigned to a substance. General comments on the consultation made by submitters, along with the Agency response, are summarised in Section 2.1. Where the controls or substance classifications were reviewed, either as a result of a submission or from internal review by the Agency, these are summarised in the tables in Section 2.2 to 2.4. Changes to controls or substance classifications are indicated in the tables in bold. Sections 2.5 and 2.6 set out other changes that have been made to certain single component NOTS since the consultation.

This summary of submissions has been provided to all submitters. It is also available from the ERMA New Zealand web site <http://www.ermanz.govt.nz/hs/transfer/nots/single-component.html>. A copy will be provided to any other interested party on request.

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<sup>1</sup> These documents remain available on the ERMA New Zealand web site: <http://www.ermanz.govt.nz/consultations/consult-transfer.asp>.

<sup>2</sup> Provided electronically on CD. No paper copies were distributed unless specifically requested.

## 1.2 Gazetting and Staged Implementation

The Authority is scheduled to consider the transfer of single component NOTS in mid June. These substances will be considered for transfer under the generic description of *Industrial and Fine Chemicals*. On approval, transfer will be affected by publication of the substance descriptions and substance classifications in a supplement to the *New Zealand Gazette*. This Gazette Notice will come into force on 1 July 2006.

Coinciding with the transfer of NOTS will be the commencement of a period of staged implementation. The details of staged implementation are given in Annex 1.

Following transfer, ERMA New Zealand will write to all notifiers with a list of their NOTS that are approved under the transfer of *Industrial and Fine chemicals*. These chemicals will then be added to the ERMA Register of Approved Hazardous Substances, at which point a HSNO approval number will be assigned. ERMA New Zealand will advise on how notifiers can obtain their approval numbers from the register.

## 2. Submitter's Comments and Agency Response

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### Code to Submitters

NO.	SUBMITTER
1	The Shepherd Color Company
2	MeadWestvaco Corporation
3	Douglas Manufacturing Ltd
4	Dominion Sure Seal Ltd
5	Ameron (New Zealand) Ltd
6	Rohm GmbH & Co. KG
7	Ciba Specialty Chemicals (NZ) Ltd
8	Degussa
9	NZ Refining Company Ltd
10	Bayer New Zealand Limited
11	FMC Corporation
12	Akzo Nobel Ink & Adhesive Resins (NZ) Limited
13	Clark Products Ltd
14	Ministry of Health
15	Shell New Zealand Ltd
16	Interchem Agencies Limited
17	Flairoma Limited
18	Aakland Chemicals 1997 Ltd
19	Soiltech
20	FIL New Zealand
21	Orion Crop Protection
22	Dominion Salt Ltd
23	Huntsman Corporation Australia Pty Ltd
24	Gulf-Pacific Industries
25	New Zealand Winegrowers
26	Castrol Oil
27	3M New Zealand Limited
28	Rebain International (NZ) Ltd
29	Bayer NZ Limited
30	Flint Hills Resources, LP
31	Bostik New Zealand Ltd
32	Wacker Chemie AG
33	Asia Pacific Speciality Chemicals

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## 2.1 GENERAL COMMENTS

Submitter	Submission	Agency Response
1, 2, 3, 6, 8, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 22, 23, 24, 26, 27, 28, 29, 30, 31, 32	Specific classification and control comments	See section 2.2 and 2.3.
5	6.9 classifications are not given with the exposure route information. This is a shortcoming of the HSNO classification system.	<p>ERMA New Zealand acknowledges that the exposure route information is required for compliance with the HSNO regulations. For substances that have already been transferred we have provided exposure route information after transfer.</p> <p>ERMA New Zealand will provide exposure route information for transferred Industrial and Fine Chemicals after transfer on 1 July 2006.</p>
7	Single component substance NOTS should be transferred by creating a new Industrial and Fine Chemicals Group Standard. A dual framework will be inconsistent with EU, create new importation barriers, increase ERMA costs and lead to poor industry compliance.	<p>The transfer of NOTS that are single component chemicals should be undertaken under s.160A to be consistent with the transfer of other single component chemicals previously transferred (Hazardous Substances (Dangerous Goods and Scheduled Toxic Substances) Transfer Notice 2004).</p> <p>This approach will not create importation barriers compared to any conditions set under group standards as the compliance requirements are the same for individual transfer and group standards.</p> <p>Staged implementation provisions are identical for all NOTS that will be transferred on 1 July 2006, this includes the Industrial and Fine chemicals as well as all group standards.</p> <p>Where a notified single component product has a specific use, the notifier can choose to comply with HSNO by using the conditions of an appropriate group standard rather than the individual controls assigned from the s.160A transfer of that substance.</p> <p>Because ERMA New Zealand does not know all the possible uses for a substance the controls listed in the consultation document are the default controls triggered by the Classifications/Controls Matrix. When transferred the variations listed in Section 4 of the consultation document will be applied to the relevant substances. These variations are in line with the conditions set under group standards.</p>

Submitter	Submission	Agency Response
7	There is no provision for the importation of samples for research and development within ERMA's transfer of Industrial and Fine Chemicals.	<p>Importation of new hazardous substances for use in research and development in a laboratory is covered by Section 33 of the Act which gives these substances an exemption from HSNO if used in compliance with the conditions set out in section 33.</p> <p>Section 30 of the Act sets out the conditions under which research and development can be carried out with a hazardous substance where a containment application is required.</p> <p>Where the conditions of section 30 or 33 are not met, then a release application is required.</p> <p>There is no intention to include provisions for importation of new single component hazardous substances with the transfer of Industrial and Fine Chemicals.</p>
9	Tetraethyl lead is still used in New Zealand therefore request transfer of the product.	The substance Tetraethyl lead 60-100% + 1,2 Dibromoethane 30-60% will be transferred with a use restriction that it can only be used as a fuel additive.
9	Request that Tert butyl methyl ether CAS 1634-04-4 be placed on the list of Chemicals of Concern and not be transferred to the HSNO Act. Submitter not aware that this substance has any use in New Zealand other than in research or analytical laboratories.	<p>This substance has a number of notifications, therefore, ERMA New Zealand is required to transfer it to HSNO.</p> <p>The request to add it to the Chemicals of Concern list will be addressed in the summary of submissions on Chemicals of Concern.</p>
14	Pleased to see that some prescriptive statements are required for group standards. Would this be a requirement for substances other than group standards?	Transfer of single component NOTS does not impose the same requirement for prescriptive statements as set out in group standards. Compliance is required with the HSNO regulations. Parties could use the same Hazard and Precautionary Statements document which gives the prescriptive requirements as a means of complying with the regulations.
14	It would be useful if the document explained why no TELs/EELs are being proposed.	ERMA New Zealand is planning on running a separate project to establish exposure limits following the completion of transfer.
16	<p>We understand from the Draft Code of Practice on Labelling (not yet approved by ERMA), that HSNO Class 6.1E classified substances that are not intended to be sold to members of the public, do not require a pictogram, signal words or hazard statements (in a place of work).</p> <p>We understand from the Draft Code of Practice on Labelling (not yet approved by ERMA), that the Toxic Hazard Pictogram, Signal Words and Hazard Statements for HSNO Class 6.4A classified substances are "Best Practice" and not mandatory.</p>	<p>For both 6.1E and 6.3B classifications under the Hazardous Substances (Identification) Regulations 2001 Regulation 14 there are no requirements for primary identifiers. Primary identifiers include pictograms and signal words.</p> <p>Under the Hazardous Substances (Identification) Regulations 2001 Regulation 25 secondary identifiers are required for class 6.1E and 6.4A substances.</p>

Submitter	Submission	Agency Response
33	Request that tracking be removed for all 6.1A substances when intended for use as a laboratory chemical in quantities less than 3 kg.	<p>Under section 33 of the HSNO Act laboratories meeting the prescribed requirements are exempt from the tracking regulations and only need comply with Regulation 9 of the <i>Hazardous Substances (Exempt Laboratories) Regulations 2001</i> with respect to tracking of substances.</p> <p>ERMA New Zealand considers that if a laboratory wants to be exempt from tracking for 6.1A substances then they should be able to meet the requirements of the <i>Hazardous Substances (Exempt Laboratories) Regulations 2001</i>.</p>
7	We ask for clarification about the workplace exposure standards WES transition timetable for single component substances or their mixtures.	NOTS will be transferred to HSNO 1 July 2006. Staged implementation allows a six month period before any controls apply, where persons continue to comply with current regulatory requirements. The requirement to follow WES's will commence after this six month period.
21	The listed substances, which are pesticide actives, were not included in Phase 2, Table 1, Substances to be transferred as pesticide, veterinary medicines and pharmaceutical actives	<p>The pesticide actives listed were consulted on in Phase 1 of the single component consultations. The Table in the Phase 2 consultation document only covered substances listed in the Phase 2 list of classifications and controls plus a few pharmaceutical actives from Phase 1. This was explained in the text of the consultation document section 3.4.</p> <p>When transferred to HSNO all the substance listed will be included in the table of pesticide, veterinary medicines and pharmaceutical actives. And the controls specific to these substances applied.</p>
22	All our salt would meet the Australian/NZ Food standards 2.10, does this mean we can declare our salt food and therefore exempt, even if it is not being used for food purposes?	<p>The HSNO Act states: A food is not hazardous for the purposes of the Act unless Parts XIII, XIV or XV of the Act apply.</p> <p>The definition of Food is the meaning as in section 2 of the Food Act 1981, except that it does not include a food additive if that food additive has not been mixed with or added to any other food or drink.</p> <p>“Food” means anything that is used or represented for use as food or drink for human beings.</p> <p>Where salt is being used for purposes other than as a food, it is considered a hazardous substance under HSNO and subject to the HSNO controls.</p>
23	Request NOTS moved to additives group standard.	Single component substances listed transferred as Industrial and Fine Chemicals will have individual approval numbers. If your product has been assigned by ERMA as a single component, you are not required to

Submitter	Submission	Agency Response
		use the individual approval number. If the product fits the scope of a group standard i.e. it has a hazard profile meeting the requirements of the group standard and fits the use type, then the product can be covered under the group standard and use the group standard approval number.
25	Request that wine be excluded from the wording applying to ethanol solutions >10% to 25%. Wine in production is a food therefore excluded from HSNO.	Alcoholic beverages with not more than 15% ethanol will be exempt from HSNO.
27	Product 0.0-1 % therefore doesn't fall into the range assigned to.	Single component dilution ranges only go down to 1%. This product is therefore not covered by the single component individual transfer. This product should therefore be assigned to the appropriate group standard. ie a group standard that includes the hazards of the substance and use type.
16	Calcium carbonate is not listed in Phase 1 or Phase 2. Does this mean it is non-hazardous?	<p>Not all single component substances notified will have an individual approval number. Some single component substances were assigned by the notifier, in consultation with the ERMA liaison and screening team, to group standards. Also single component substances where ERMA does not have reliable hazard data to assign classifications cannot be transferred individually. These substances will need to use group standard approval also.</p> <p>There are two more reasons why a single component substance will not be transferred individually with the Industrial and Fine Chemicals:</p> <ol style="list-style-type: none"> <li>1. The substance is non hazardous, therefore not covered by HSNO.</li> <li>2. The substances hazard properties have not been fully investigated therefore the hazards are unknown.</li> </ol> <p>Note: For ERMA to determine a substance non hazardous a section 26 determination is required.</p> <p>ERMA has no data to indicate that calcium carbonate triggers any of the HSNO classifications.</p>

## 2.2 CONTROL REVIEWS

➤ Only controls where submitters requested reviews are listed in the table.

Substance Description	CAS Number	Control Review	Decision on Control Review
Alcohol ethoxylates	68002-97-1	T8 control not applicable	<b>T8 removed</b>
Ammonium chloride	12125-02-9	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 8.1A classification. PG3 is required for 8.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS.
Benzalkonium chloride	8001-54-5	Remove AH1 and TR1	<b>TR1 removed</b> AH1 applies only if used in a wide dispersive manner
Benzalkonium chloride	63449-41-2	Request removal of AH1 from 9.1A. Used in the manufacture of disinfectants	AH control can be deleted for this use but will remain on substance if used in a wide dispersive manner.
Benzene sulphonic acid, C10-16 alkyl deriv	68584-22-5	Request removal of AH1 from 9.1A. Used in the ingredient in laundry powder and dishwasher detergent.	<b>AH control removed.</b>
Bromochlorodimethylhydantoin	126-06-7	Remove AH1 from 9.1A classification	<b>AH1 from ecotoxicity removed.</b>
Calcium propionate	4075-81-4	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 6.1C dermal classification. PG3 is required for 6.1C substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Citric acid	77-92-9	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>

Substance Description	CAS Number	Control Review	Decision on Control Review
Cobalt (II) sulphate	10124-43-3	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1A. Data supplied by submitter supports 9.1A classification. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS.
Cobalt hydroxide	21041-93-0	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 6.1C oral classification. PG3 is required for 6.1C substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Cobalt sulphate	60459-08-7	Remove PG3 and AH1	PG3 and AH1 from 9.1A. Under UN model regulations PG3 is a requirement for the 9.1A classification. AH1 only applies for 9.1A substances where they have wide dispersive use.
Cobalt sulphate heptahydrate	10026-24-1	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1A. Data supplied by submitter supports 9.1A classification. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS.
Copper (I) oxide	1317-39-1	Remove PG3 and AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1 for farmers	PG3 triggered by 9.1A. Data supplied by submitter supports 9.1A classification. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Copper (II) carbonate hydroxide	12069-69-1	Remove PG2 as the substance is not currently regulated as a DG	Classification down graded to a 6.1C which requires PG3. PG3 is required for 6.1C substances under the UN recommendations on the Transport of

Substance Description	CAS Number	Control Review	Decision on Control Review
			Dangerous Goods, Model Regulations and GHS
Copper (II) oxide	1317-38-0	Remove PG3 and AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1 for farmers	PG3 triggered by 9.1A. Data supplied by submitter supports 9.1A classification. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Copper carbonate	1184-64-1	Remove PG3, AH1 and TR1	PG3 from 9.1A classification PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 from 9.1A only applies when used in a wide dispersive manner. <b>TR1 removed</b>
Copper sulphate pentahydrate	7758-99-8	Remove AH1 from 9.1A. Widely used by farmers.	AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Copper sulphate pentahydrate	7758-99-5	Request removal of AH1 from 9.1A. Sold to a broad customer base. Primarily used in fertiliser blends as a trace element.	AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Diethanolamine	111-42-2	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Diethanolamine, >26% in an inert medium	111-42-2	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Dodecyl sodium sulphate	151-21-3	Remove PG3 as the substance is not	PG3 triggered by 6.1C dermal classification.

Substance Description	CAS Number	Control Review	Decision on Control Review
		currently regulated as a DG	PG3 is required for 6.1C substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Dodecylbenzenesulfonic acid	27176-87-0	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Dodecyldimethylamine oxide	1643-20-5	Remove PG2 and AH1 as the substance is not currently regulated as a DG	PG2 triggered by 8.2B. PG2 is required for 8.2B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS.
Ethanol, >10% to 25% in an inert medium	64-17-5	3.1C transport controls	<b>3.1C transport controls removed</b>
Ethylene glycol monobutyl ether >25%	111-76-2	Request removal of AH1 from 6.1C. Used in the manufacture of bleach and as a swimming pool chemical.	This DG/STS 100% has a change to the control which removes the requirement for an approved handler. Now only required to be kept under lock and key. This variation to the control will also be applied to this dilution.
Guar gum >26%	9000-30-0	Remove PG3 classification does not justify control	PG3 was triggered by 6.5A classification. This control amended so 6.5A no longer triggers PG3. <b>PG3 removed</b>
Hypochlorous acid, calcium salt (dry) > 39% available chlorine	7778-54-3	Remove AH1 from 9.1A classification	<b>AH1 from ecotoxicity removed.</b>
Lactic acid	598-82-3	Remove PG3	PG3 from 8.2C. Under UN model regulations PG3 is a requirement for 8.2C classification.
(D)-Limonene >26%	5989-27-5	Request removal of AH1 from 9.1A. Used in the manufacture of hard surface cleaners.	<b>AH control removed.</b>

Substance Description	CAS Number	Control Review	Decision on Control Review
Manganese (II) sulphate monohydrate	10034-96-5	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1B classification. PG3 is required for 9.1B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Manganese (II) sulphate monohydrate, >26% in an inert medium	10034-96-5	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1B classification. PG3 is required for 9.1B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Manganese sulphate	7785-87-7	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1B. PG3 is required for 9.1B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Octynol	9002-93-1	Request removal of AH1 from 9.1A. Used in the manufacture of hard surface cleaners and dishwasher liquid.	<b>AH1 from ecotoxicity removed.</b>
o-Dichlorobenzene	95-50-1	Remove AH1 and TR1	<b>AH1 and TR1 removed.</b>
Oxalic acid	144-62-7	Remove PG3	PG3 from 8.2C and 8.1A classifications. Under UN model regulations PG3 is a requirement for 8.2C and 8.1A classifications.
Papin	9001-73-4	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 6.5A classification. This control amended so 6.5A no longer triggers PG3. <b>PG3 removed</b>
Papin	9001-73-4	Remove PG3 classification does not justify control	PG3 was triggered by 6.5A classification. This control amended so 6.5A no longer triggers PG3. <b>PG3 removed</b>
p-Dichlorobenzene	106-46-7	Remove AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1	<b>AH control removed.</b>

Substance Description	CAS Number	Control Review	Decision on Control Review
Polyethylene glycol nonylphenol ether	9016-45-9	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1B. PG3 is required for 9.1B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Polymethylene polyisocyanate	9016-87-9	Remove 6.1B classification Remove AH1 and TR1 from 6.1B inhalation	<b>PG2 removed and replaced with PS4</b> Still 6.1B therefore AH1 and TR1 remain
Polymethylene polyphenylisocyanate	9016-87-9	Request removal of PG2, AH1 and TRI from 6.1B inhalation hazard.	<b>PG2 removed and replaced with PS4</b> Still 6.1B therefore AH1 and TR1 remain
Potassium disulfite	16731-55-8	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Potassium iodide	7681-11-0	Remove PG3 as the substance is not currently regulated as a DG	PG3 triggered by 9.1B classification. PG3 is required for 9.1B substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS
Potassium nitrate >10-25%	7757-79-1	Remove PG2 (from 5.1.1B) as the pure (100%) substance currently regulated as a PG3 Remove site test certificate requirement	Classification downgraded to 5.1.1C and PG3 Site test certificate requirements are only triggered at 100 L where a substance is manufactured or used. The trigger quantity is 1000 L if the substance is being stored only. Site test certificate requirements remain.
Potassium permanganate >3% and 10-14%		Request removal of AH1 from 9.1A. Used in small quantities as a sanitiser in the food industry. AH not triggered by 5.1.1B at small quantities.	<b>AH1 from ecotoxicity removed.</b> AH from 5.1.1B classification is only triggered at quantities 500 kg or 500 L
Sodium chlorite >3 to 5% and >25-46%		Request removal of AH1 from 9.1A. Used as a sanitiser in a narrow range of processes. AH not triggered by 5.1.1B at small quantities.	<b>AH1 from ecotoxicity removed.</b> AH from 5.1.1B classification is only triggered at quantities 500 kg or 500 L

Substance Description	CAS Number	Control Review	Decision on Control Review
Sodium diacetate	126-96-5	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Sodium dichloroisocyanurate >37% and >3 to 10%	2893-78-9	Request removal of AH1 from 9.1A. Used as a swimming pool sanitiser. AH not triggered by 5.1.1B at small quantities.	<b>AH1 from ecotoxicity removed.</b> AH from 5.1.1B classification is only triggered at quantities 500 kg or 500 L
Sodium hypochlorite >5%	7681-52-9	Request removal of AH1 from 9.1A. Used in the manufacture of bleach and as a swimming pool chemical.	<b>AH1 from ecotoxicity removed.</b>
Sodium iodide	7681-82-5	Remove AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1	AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Sodium orthophosphate, tribasic	7601-54-9	Remove PG3 as the substance is not currently regulated as a DG	PG3 was triggered by 8.3A classification. This control amended so 8.3A no longer triggers PG3. <b>PG3 removed</b>
Soya alkylamine, ethoxylated	61791-24-0	Remove PG3 and AH1 as the substance is not currently regulated as a DG	PG3 triggered by 9.1A. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. <b>AH control removed.</b>
Triclosan	3380-34-5	Request removal of AH1 from 9.1A. Used as a sanitiser in hand soaps at less than 1gm per litre.	<b>AH1 from ecotoxicity removed.</b>
Zinc chloride 10-25% and >25 to 67%	7646-85-7	Request removal of AH1 from 9.1A. Used in the manufacture of hard surface cleaners and dishwasher liquid.	AH1 only applied for ecotoxicity classification if used in a wide dispersive manner.
Zinc oxide	1314-13-2	Remove PG3 and AH1 as the substance is	PG3 triggered by 9.1A. Data supplied by

Substance Description	CAS Number	Control Review	Decision on Control Review
		not currently regulated as a DG. Seek exemption/concession for AH1 for farmers	submitter supports 9.1A classification. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 only applied for ecotoxicity classification if used in a wide dispersive manner.
Zinc sulphate	7733-02-0	Remove PG3 and AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1 for farmers	PG3 triggered by 9.1A. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.
Zinc sulphate heptahydrate	7446-20-0	Remove PG3	PG3 and AH1 from 9.1A. Under UN model regulations PG3 is a requirement for 9.1A classification. AH1 only applies for 9.1A substances where they have wide dispersive use.
Zinc sulphate monohydrate	7446-19-7	Remove PG3 and AH1 as the substance is not currently regulated as a DG. Seek exemption/concession for AH1 for farmers	PG3 triggered by 9.1A. PG3 is required for 9.1A substances under the UN recommendations on the Transport of Dangerous Goods, Model Regulations and GHS. AH1 only applies for ecotoxicity classification if used in a wide dispersive manner.

## 2.3 CLASSIFICATION REVIEWS

The following substances and their classifications were reviewed as requested by submitters, and also from internal review processes. Only classifications which have been challenged are included in the table. All other classifications remain the same as in the consultation document.

Where a change in classification resulted from these reviews, these changes are shown in bold.

A substance that no longer triggers at least one of the hazardous substances properties specified in regulation 7 of the *Hazardous Substances (Minimum Degrees of Hazard) regulations 2001* does not need an HSNO approval.

**Note: A change in classification, generally, results in a change in the controls triggered.**

Substance Description	CAS Number	Classification Review	Decision on Classification Review
(4-Methoxyphenyl) acetonitrile	104-47-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
1,10-Phenanthroline monohydrate	5144-89-8	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
1,2-Dibromoethane	106-93-4	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
1,3-Phenylenediamine	108-45-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
1,4-Phenylenediammonium dichloride	624-18-0	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
1-Chloro-2,4-dinitrobenzene	97-00-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
1-Chloro-3-nitrobenzene	121-73-3	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
1-Hydroxybenzotriazole hydrate	123333-53-9	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
2,3-Dimethylaniline	87-59-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,3-dimethylaniline	87-59-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,4,5-Trichloroaniline	636-30-6	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,4-Dichloroaniline	554-00-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,4-Dimethylaniline	95-68-1	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,4-Dimethylpyridine	108-47-4	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>

<b>Substance Description</b>	<b>CAS Number</b>	<b>Classification Review</b>	<b>Decision on Classification Review</b>
2,4-Dinitrophenylhydrazine	119-26-6	No 6.1 or 9.3 classification	<b>6.1D, 9.3C added</b>
2,5-Dichloroaniline	95-82-9	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,5-Dimethylaniline	95-78-3	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2,6-Dichloroaniline	608-31-1	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2-Aminooctane	693-16-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Bromoaniline	615-36-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Chloroacetamide	79-07-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Chloroaniline	95-51-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2-Chlorobenzyl cyanide	2856-63-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Chloronitrobenzene	88-73-3	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2-Chloropyridine	109-09-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Methyl-3-nitroaniline	603-83-8	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Methyl-4-nitroaniline	99-52-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
2-Nitroaniline	88-74-4	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
2-Propyn-1-ol	107-19-7	No 6.1 or 9.3 classification	<b>6.1A, 9.3A added</b>
3,4-Dichloroaniline	95-76-1	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
3,4-Dimethylaniline	95-64-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
3-Bromo-1-propene	106-95-6	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
3-Bromoaniline	591-19-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
3-Chloroaniline	108-42-9	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
3-Mercaptopropionic acid	107-96-0	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>

<b>Substance Description</b>	<b>CAS Number</b>	<b>Classification Review</b>	<b>Decision on Classification Review</b>
3-Nitroaniline	99-09-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
3-tert-Butyl-hydroxyanisole	121-00-6	Possibly add 6.7B, 6.5A, 6.5B	<b>Add 6.5B only</b>
4-(1-Pyrrolidinyl) pyridine	2456-81-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
4-Bromoaniline	106-40-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
4-Chloroaniline	106-47-8	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
4-Nitroaniline	100-01-6	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
6-Nitro-o-toluidine	570-24-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Acid yellow 23, tetramethylammonium salt	131013-81-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Adiponitrile	111-69-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Alcohols, C12-14, ethoxylated	68439-50-9	Review 6.1D, 6.3B, 6.4A, 9.1D	<b>6.1D changed to a 6.1E</b> 6.3B confirmed <b>6.4A changed to a 8.3A</b> <b>9.1D changed to 9.1A</b>
Alkyl dimethyl benzyl ammonium chloride	63449-41-2	Classification reviewed to be consistent with CAS 8001-54-5.	<b>6.1D changed to 6.1C</b> <b>6.5A, 6.5B, 6.9B added</b> <b>9.3C changed to 9.3B</b>
Alkyl dimethyl benzyl ammonium chloride, >26% in a non hazardous diluent	63449-41-2	Classification reviewed to be consistent with CAS 8001-54-5.	<b>6.1D changed to 6.1C</b> <b>6.5A, 6.5B, 6.9B added</b> <b>9.3C changed to 9.3B</b>
Allyl alcohol	107-18-6	No 6.1 or 9.3 classification	<b>6.1A, 9.3A added</b>
Allyl isothiocyanate	57-06-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Allyl isothiocyanate	57-06-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Antimony (III) fluoride	7783-56-4	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>

<b>Substance Description</b>	<b>CAS Number</b>	<b>Classification Review</b>	<b>Decision on Classification Review</b>
Antimony pentasulphide	1315-04-4	Not a liquid 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Arsenazo III	1668-00-4	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Avocado oil	8024-32-6	Incorrect classification assigned in consultation document.	<b>6.1B removed 6.3A, 6.4A added</b>
Benzisothiazolinone, >3% to 9% in an inert medium	2634-33-5	Review 9.1B classification	<b>Changed to 9.1D</b>
Benzyltriphenylphosphonium chloride	1100-88-5	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Beryllium	7440-41-7	Not a liquid 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Bis(4-chlorophenyl) diselenide	20541-49-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Boron hydride morpholine	4856-95-5	Not a liquid 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Butyl chloroformate	592-34-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Butylhydroxytoluene	128-37-0	Should be 6.3A/B and 6.4A	Classification remains unchanged. Not enough data to support 6.3B/6.4A classification
Butyronitrile	109-74-0	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Cacodylic Acid, sodium salt	124-65-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Cadmium iodide	7790-80-9	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Calcium chloride	10043-52-4	Non hazardous Request removal of 6.1D, 6.3A, 6.4A, 9.3C	6.1D, 6.3A, 6.4A, 9.3C confirmed
Calcium chloride dihydrate	10035-04-8	Non hazardous Request removal of 6.1D, 9.3C	6.1D, 9.3C confirmed <b>6.3B, 6.4A added</b>
Carbonodithioic acid, O-(2-methylpropyl) ester, sodium salt	25306-75-6	Review 8.2 and 8.3 classification	<b>8.2 and 8.3 removed 6.3A, 6.4A added Substance description changed to Sodium isobutyl xanthate</b>
Cetomacrogol	9004-95-9	Review 6.1E, 6.3A, 6.4A	6.1E confirmed.

Substance Description	CAS Number	Classification Review	Decision on Classification Review
			<b>6.3A, 6.4A removed</b>
Chitosan	9012-76-4	Remove 9.1A	9.1A confirmed
Chloroacetic acid	79-11-8	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Chloroacetone	78-95-5	No 6.1 or 9.3 classification	<b>6.1B, 8.2C, 8.3A, 9.3A added</b>
Chloroacetonitrile	107-14-2	No 6.1C, 6.1 or 9.3 classification	<b>3.1C, 6.1B, 9.3A added</b>
Chrome antimony titanium oxide	68186-90-3	Non Hazardous Request removal of 6.1D	<b>6.1D removed</b> No longer triggers any HSNO classifications, includes dilutions
Cinchocaine hydrochloride	61-12-1	6.1 should be higher, currently 6.1E	<b>Add 6.5B, 6.1B, 9.1A</b>
Citric acid monohydrate	5949-29-1	Request removal of 6.1E, 6.3B and 8.3A.	6.1E, 6.3B, 8.3A confirmed
Citronellol		Request removal of 3.1D	3.1D confirmed Because this is a natural product the composition may vary. This variation can change the flammability. If product data shows that the product is not flammable the 3.1D classification does not apply.
Cocamidopropyl dimethylamine oxide, >25% in an inert medium	68155-09-9	Review, 6.1D, 6.3ND and 6.4ND	6.1D removed <b>6.1E, 6.3B, 6.4A added</b>
Cocoamphocarboxy glycinate	68650-39-5	Incorrect classification assigned in consultation document	<b>6.1C removed</b> <b>6.3A, 6.4A added</b>
Copper (II) carbonate hydroxide	12069-69-1	Dispute 6.1B Remove PG2 as the substance is not currently regulated as a DG	Classification down graded to a 6.1C, which requires PG3
Copper sulphate pentahydrate	7758-99-8	Request removal of 9.1A	9.1A confirmed AH1 only applied for ecotoxicity classification if used in a wide dispersive manner.

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Cyclohexanecarbonitrile	766-05-2	Review 8.2A and 8.3A	<b>8.2A, 8.3A removed</b>
Cyclohexyl methacrylate	101-43-9	Request removal of 6.3A	<b>Change to 6.3B</b>
Dibenzoyl peroxide >26% in a non hazardous diluent	94-36-0	Review 5.2B classification	<b>5.2B changed to 5.2C</b> Name changed to Dibenzoyl peroxide, >26% to 77% aqueous solution
Dibutyltin dichloride	683-18-1	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Di-iron nonacarbonyl	15321-51-4	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Dimethylaminoethanol >1%-2% in a non hazardous diluent	108-01-0	Review 3.1C classification Can a group standard approval be used for a single component product?	Any product that is a single component can be assigned to the appropriate group standard and the group standard approval number can be used to cover the product. <b>3.1C removed</b>
Diphenyl diselenide	1666-13-3	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Direct yellow 96, tetramethylammonium salt	131013-83-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Disodium sulphite	7757-83-7	No hazardous Request removal of 9.1D	9.1D confirmed
Disodium zinc EDTA	14025-21-9	Dispute 6.1D, 6.4A, 9.3C classifications	<b>6.4A removed</b> 6.1D, 9.3C confirmed
Dithioethylene glycol	540-63-6	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Dodecyldimethylamine oxide	1643-20-5	Review 8.2B and 8.3A	8.2B, 8.3A confirmed
Ethanol, >5% to 10% in an inert medium	64-17-5	3.1C	<b>3.1C removed</b> No longer triggers any HSNO classifications
Ethanol, 1% to 5% in an inert medium	64-17-5	3.1D	<b>3.1D removed</b> No longer triggers any HSNO classifications
Ethyl 4-chloroacetoacetate	638-07-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Ethyl thioglycolate	623-51-8	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Germanium (powder)	7440-56-4	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1A</b>
Guanidinium chloride	50-01-1	No 6.1 or 9.3 classification	<b>6.1D, 9.3C added</b>
Hematoxylin	517-28-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Hexachloropropene	1888-71-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Hexakis(tetramethylammonium) 4,4'-vinylenebis((3-sulfonato-4,1-phenylene)imino(6-morpholino-1,3,5-triazine-4,2-diyl)imino)bis(5-hydroxy-6-phenylazonaphthalene-2,7-disulfonate)	124537-30-0	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Hydrazinium dichloride	5341-61-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Hydrazinium monobromide	13775-80-9	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Hydrazinium sulphate	10034-93-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Hypochlorous acid, sodium salt	7681-52-9	Remove 5.1.1B	<b>5.1.1B removed</b>
Indium	7440-74-6	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1A</b>
Iodoacetic acid	64-69-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Iodomethane	74-88-4	No 9.3 classification	<b>9.3A added</b>
Iridium powder	7439-88-5	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Iron oxide	1309-37-1	Non hazardous Review 6.3A, 6.4A, 6.9A, 9.1D	<b>6.9A, 9.1D removed</b> 6.3A, 6.4A confirmed
Iron oxide	1309-37-1	Non hazardous Review 6.3A, 6.4A, 6.9A, 9.1D	<b>6.9A, 9.1D removed</b> 6.3A, 6.4A confirmed
Limestone	1317-65-3	No hazardous Request removal of 6.4A	<b>6.4A removed</b> No longer triggers any HSNO classifications
Lithium carbonate	554-13-2	No 6.8 classification	<b>6.8A added</b>

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Lithium stearate	4485-12-5	Review 6.8A.	6.8A confirmed
L-Nicotine	54-11-5	No 9.3 classification	<b>9.3A added</b>
Magnesium carbonate	546-93-0	No hazardous Request removal of 6.4A	<b>6.4A removed</b> No longer triggers any HSNO classifications
Magnesium carbonate hydroxide	12125-28-9	No hazardous Request removal of 6.3B, 6.4A	<b>6.3B removed</b> 6.4A confirmed
Magnesium hydroxide	1309-42-8	No hazardous Request removal of 6.4A	6.4A confirmed
Magnesium oxide	1309-48-4	Non hazardous Request removal of 6.3B, 6.4A, 6.9B, 9.1D	<b>6.3B removed</b> 6.4A, 6.9B confirmed <b>9.1D removed</b>
Magnesium oxide	1309-48-4	Dispute 6.3B, 6.4A and 6.9B	<b>6.3B, 6.4A, 6.9B removed</b> No longer triggers any HSNO classifications
Malononitrile	109-77-3	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Manganese antimony titanium oxide	68412-38-4	Non Hazardous Request removal of 6.1D	<b>6.1D removed</b> No longer triggers any HSNO classifications, includes dilution
Manganese sulphate, >3%-9% in an inert medium	7785-87-7	Non hazardous Request removal of 6.9B, 9.1C	6.9B, 9.1C confirmed
Mercury	7439-97-6	Review corrosive classifications	<b>8.2C, 8.3A removed</b> <b>8.1A added</b>
Methyl thiocyanate	556-64-9	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Methyl thioglycolate	2365-48-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Methyl yellow	60-11-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3A added</b>
Monoammonium phosphate	7722-76-1	Non hazardous	6.3B, 6.4A confirmed

Substance Description	CAS Number	Classification Review	Decision on Classification Review
		Request removal of 6.3A, 6.4A	
m-Toluidine	108-44-1	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
N,N-Diethyl-1,4-phenylenediamine	93-05-0	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
N,N-Diethylaniline	91-66-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
N,N-Dimethyl-4-nitrosoaniline	138-89-6	UN 1369 class 4.2 PGII 4.2B classification missing	<b>4.2B added</b>
N,N-Dimethylhydrazine	57-14-7	No 3.1, 6.1 or 9.3 classification	<b>3.1C, 6.1B, 9.3A added</b>
N,N-Dimethyloctylamine	7378-99-6	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
N-Ethylaniline	103-69-5	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
N-Ethylmaleimide	128-53-0	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Nickel (II) chloride anhydrous	7718-54-9	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Nickel (II) chloride hexahydrate	7791-20-0	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Nitriles, Toxic, N.O.S (4-Chlorobenzyl Cyanide)	140-53-4	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
N-Methylaniline	100-61-8	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
o-Anisidine	90-04-0	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
o-Cresol	95-48-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
O-Phenetidine	94-70-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
o-Toluidinium chloride	636-21-5	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Oxirane, methyl-, polymer with oxirane, monobutyl ether	9038-95-3	Review 6.1B, 6.9A	<b>6.1B changed to 6.1D 6.9A changed to 6.9B</b>
Parabenzoquinone	106-51-4	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
p-Cresol	106-44-5	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Pentasodium tripolyphosphate	7758-29-4	Request removal of 6.1E and 6.4A	6.1E, 6.4A confirmed
Pentasodium tripolyphosphate	7758-29-4	Non hazardous Request removal of 6.1E, 6.4A	6.1E, 6.4A confirmed
Phenol, 3,4-dinitro-	577-71-9	No 4.1.3, 6.1 or 9.3 classification	<b>4.1.3A, 6.1C, 9.3B added</b>
Phenylhydrazinium chloride	59-88-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Phenylselenyl bromide	34837-55-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Phenylselenyl chloride	5707-04-0	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Phthaldialdehyde	643-79-8	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Poly(oxy-1,2-ethanediyl), .alpha.-dodecyl-.omega.-hydroxy-	9002-92-0	Review, 6.3A, 6.3B, 9.1D	6.1D, 6.3A, 8.3A confirmed 9.1D confirmed
Poly(oxy-1,2-ethanediyl), .alpha.-dodecyl-.omega.-hydroxy-	9002-92-0	Review 6.3B and 9.1D	6.3B confirmed <b>9.1D changed to 9.1A</b>
Poly(oxy-1,2-ethanediyl), .alpha.-phenyl-.omega.-hydroxy-, styrenated	104376-75-2	Data to support 9.1C added	<b>9.1C added</b>
Polyalkylene derivative of a synthetic alcohol	103818-93-5	Recommend 6.1D, 6.3B and 6.4A removed	<b>6.1D, 6.3B and 6.4A removed</b>
Polyethylene glycol monooleyl ether	9004-98-2	Review 6.1E, 6.4A	6.1E confirmed. <b>Remove 6.4A</b>
Polymethylene polyisocyanate	9016-87-9	Remove 6.1B classification remove AH1 and TR1 from 6.1B inhalation	6.1B confirmed <b>PG2 changed to PS4 from 6.1B(inhalation)</b>
Polyoxyethylene isotridecyl ether	9043-30-5	Review 6.1E, 6.3A, 9.1A	6.1E, 6.3A, 6.4A confirmed, 9.1A confirmed
Potassium phosphate monobasic	7778-77-0	Non hazardous Request removal of 6.1D, 6.4A, 9.1D, 9.3C	6.1D, 6.4A, 9.3C confirmed <b>9.1D removed</b>
Potassium sorbate	590-00-1	Non hazardous	6.1E, 6.4A confirmed

Substance Description	CAS Number	Classification Review	Decision on Classification Review
		Request removal of 6.1E, 6.4A, 9.1D	<b>9.1D removed</b>
Potassium tripolyphosphate >26%	13845-36-8	Dispute 6.1D, 9.3C	<b>6.1D changed to 6.1E</b> <b>9.3C removed</b>
p-Phenylenediamine	106-50-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Propylene glycol monoacrylate	25584-83-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
p-Toluidine	106-49-0	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
p-Toluidine hydrochloride	540-23-8	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Rhenium	7440-15-5	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Rhodium	7440-16-6	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Rhodium	7440-16-6	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Rosin	8050-09-7	Review all classifications	<b>6.1D changed to 6.1E</b> <b>6.3B and 6.4A deleted</b> 6.5B and 9.1D confirmed
Sodium acetate	127-09-3	Non hazardous Request removal of 6.1E, 6.4A	6.1E, 6.4A confirmed
Sodium alginate	9005-38-3	Review 6.5B classification	<b>6.5B removed</b>
Sodium benzoate	532-32-1	Non hazardous Request removal of 6.1D, 9.1D, 9.3C	<b>6.1D changed to 6.1E</b> 9.1D confirmed <b>9.3C removed</b>
Sodium cacodylate	124-65-2	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Sodium carbonate	497-19-8	Review 6.1B, 6.3A, 6.9B	6.1B(inhalation), 6.3A, 6.9B(inhalation) confirmed
Sodium carbonate	497-19-8	Non hazardous Request removal of 6.1B, 6.3A, 6.4A, 6.9B	6.1B(inhalation), 6.3A, 6.4A, 6.9B(inhalation) confirmed

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Sodium carbonate dilutions	497-19-8	All non hazardous	Classifications confirmed
Sodium carboxymethylcellulose	9004-32-4	Non hazardous Request removal of 9.1C	9.1C confirmed
Sodium carboxymethylcellulose, >26% in an inert medium	9004-32-4	Non hazardous Request removal of 9.1C	9.1C confirmed
Sodium chloride	7647-14-5	Non hazardous Request removal of 6.1E, 6.4A, 9.1D	6.1E, 6.4A confirmed <b>9.1D removed</b>
Sodium chloride		Remove 9.1D, 6.4A	<b>9.1D removed</b> 6.4A confirmed
Sodium chloroacetate	3926-62-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Sodium hydrogen selenite	7782-82-3	No 6.1 or 9.3 classification	<b>6.1A, 9.3A added</b>
Sodium iodide	7681-82-5	Dispute 6.9A; downgrade to 6.9B	6.9A confirmed
Sodium monovanadate	13718-26-8	No 6.1 or 9.3 classification	<b>Add 6.1C, 9.3A</b>
Sodium O-isopropyl xanthate	140-93-2	4.2B classification missing	<b>4.2B added</b>
Sodium perborate tetrahydrate	10486-00-7	Non hazardous Request removal of 6.1D	6.1D confirmed
Sodium persulfate >65% in inert medium	7775-27-1	6.1D should be 6.1C 6.3A should be 6.3B 6.4A should be No 9.1C should be No	6.1D, 6.3A, 6.4A confirmed <b>9.1C changed to 9.1D</b>
Sodium phosphate	7558-80-7	Non hazardous Request removal of 6.1E, 6.3B, 6.4A	6.1E, 6.3B, 6.4A confirmed
Sodium phosphate dihydrate	10028-24-7	Non hazardous Request removal of 6.3B, 6.4A	<b>6.1E (inhalation) added</b> 6.3B, 6.4A confirmed
Sodium selenate	10102-23-5	No 6.1 or 9.3 classification	<b>6.1A, 9.3A added</b>

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Sodium selenate, hydrated	10102-23-5	Classifications reviewed to be consistent with anhydrous form.	<b>6.1A changed to 6.1B</b> <b>6.4A, 6.6B, 9.2A added</b>
Sodium sulphate	7757-82-6	Non hazardous Request removal of 9.1D	<b>9.1D removed</b> No longer triggers any HSNO classifications
Sorbitan monolaurate	1338-39-2	Review 6.3A, 6.4A	<b>6.3A, 6.4A removed</b> No longer triggers any HSNO classifications
Sorbitan monostearate	1338-41-6	Review 6.3A, 6.4A	<b>6.3A removed</b> No longer triggers any HSNO classifications
Sorbitan monosterate	1338-41-6	Non hazardous Request removal of 6.3A	<b>6.3A removed</b> No longer triggers any HSNO classifications
Sorbitan, monohexadecanoate	26266-57-9	Review 6.3A, 6.4A	<b>6.3A and 6.4A removed</b>
Soya alkylamine, ethoxylated	61791-24-0	Remove 9.1A Add 6.1D, 6.3A, 8.3A	9.1A confirmed <b>6.1D added</b> 6.3A, 8.3A not confirmed
Stannane, trichloromethyl-	993-16-8	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1B</b>
Stearly methacrylate	32360-05-7	Not 6.3A	<b>Change to 6.3B</b>
Sulphonic acids, C14-16-alkane hydroxyl and C14-16-alkene, sodium salts	68439-57-6	Non hazardous Request removal of 6.1E, 6.3A, 6.4A, 9.1D	6.1E, 6.3A, 6.4A confirmed 9.1D confirmed
Tall oil	8002-26-4	Non Hazardous Request removal of 9.1D	9.1D confirmed
Tall oil rosin	8052-10-6	Review 6.5B	6.5B confirmed
Tellurium	13494-80-9	Not a liquid, 3.1C not appropriate	<b>Changed to 4.1.1A</b>
Terephthaloyl dichloride	100-20-9	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Tetraphenyl arsonium chloride	104170-16-3	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>

Substance Description	CAS Number	Classification Review	Decision on Classification Review
Tetrasodium pyrophosphate	7722-88-5	Dispute 6.4A	6.4A confirmed
Thioglycolic acid	68-11-1	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Toluidines	95-53-4	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Tributyl phosphate	126-73-8	Non hazardous Request removal of 6.1D	6.1D confirmed
Trichloroacetonitrile	545-06-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Triphenylphosphine selenide	3878-44-2	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Triphenyltin chloride	639-58-7	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Triphenyltin hydride	892-20-6	No 6.1 or 9.3 classification	<b>6.1C, 9.3B added</b>
Tripropyltin chloride	2279-76-7	No 6.1 or 9.3 classification	<b>6.1B, 9.3A added</b>
Tris(2-butoxyethyl) phosphate	78-51-3	Non hazardous Request removal of 6.1E, 9.1D	6.1E, 9.1D confirmed
Trisodium phosphate, >10% in an inert medium	10101-89-0	Non hazardous Request removal of 6.3A, 6.4A	6.3A, 6.4A confirmed
Vanadium (IV) oxide sulphate 5-hydrate	27774-13-6	No 6.1 classification	<b>6.1C added</b>
White mineral oil	8042-47-5	Dispute 9.1D	<b>9.1D Removed</b>
Zeolites	1318-02-1	Non hazardous Request removal of 6.4A	<b>6.4A remove</b> No longer triggers any HSNO classifications
Zinc sulphate	7733-02-0	Dispute 8.3A	8.3A confirmed
Zinc sulphate monohydrate	7446-19-7	Dispute 8.3A	8.3A confirmed
Zinc sulphate, >10% to 24% in an inert medium	7733-02-0	Non hazardous Request removal of 6.1E, 6.9B, 8.3A, 9.1B	6.1E, 6.9B, 8.3A confirmed 9.1B confirmed

## 2.4 SUBSTANCE DESCRIPTION REVIEWS

The following substances and their substance descriptions were reviewed as a result of internal peer-review processes.

Substance Description	CAS number	Review Required	New Substance Description
Ethanol, >10% to 25% in an inert medium	64-17-5	Range needs to be adjusted to be in line with the UN recommendations on the Transport of Dangerous Goods, Model Regulations	Ethanol, >10% to 24% in an inert medium
Ethanol, >25% to 50% in an inert medium	64-17-5	Range needs to be adjusted to be in line with the UN recommendations on the Transport of Dangerous Goods, Model Regulations	Ethanol, >24% to 50% in an inert medium

## 2.5 SUBSTANCES THAT WILL NOT BE TRANSFERRED

The following substances were included in the consultation on the transfer of single component NOTS (either Phase 1 or Phase 2 of the consultation). These substances will now no longer be transferred.

Substance Description	CAS number	Reason substance will not be transferred
Uranium	7440-61-1	The Radiation Protection Regulations 1982, under which these substances are already controlled, are considered adequate to cover any toxic or ecotoxic hazards that these substances may have.
Uranyl nitrate	13520-83-7	The Radiation Protection Regulations 1982, under which these substances are already controlled, are considered adequate to cover any toxic or ecotoxic hazards that these substances may have.
Uranium, bis(acetato- $\kappa$ O)dioxo-, (T-4)-	541-09-3	The Radiation Protection Regulations 1982, under which these substances are already controlled, are considered adequate to cover any toxic or ecotoxic hazards that these substances may have.
Uranium, bis(nitrato- $\kappa$ O)dioxo-, (T-4)-	10102-06-4	The Radiation Protection Regulations 1982, under which these substances are already controlled, are considered adequate to cover any toxic or ecotoxic hazards that these substances may have.

## 2.6 CONTROLLED SUBSTANCE LICENCE

The Phase 2 Single Component NOTS consultation proposed a control that would apply a Controlled Substance License (CSL) to the following substances. This was to align the controls applying to these substances with controls applied to the previous transfer of vertebrate poisons. However, following further consultation with industry, this control will not be applied to these substances on transfer.

<b>Substance Description</b>	<b>CAS number</b>	<b>Controls which will not be applied</b>
Sodium cyanide	143-33-9	CSL will not be applied
Potassium cyanide	151-50-8	CSL will not be applied

## Annex 1: Staged Implementation for NOTS

These provisions will apply to single component notified toxic substances (NOTS) that are transferred from the transitional provisions to the main framework of the HSNO Act. The purpose of staged implementation is to allow importers, manufacturers and users of these substances a period of time to become familiar with the controls, and to progressively implement these controls.

The key dates for staged implementation are set out in the table below.

<b>1 July 2006</b>	NOTS transferred to HSNO. Six month period commences before any controls apply. Persons continue to comply with current regulatory requirements
<b>1 January 2007</b>	Approved handler test certificates required (either deemed <sup>1</sup> or full five year certificate) <sup>2</sup> Compliance required with all controls, with the exception of controls for: <ul style="list-style-type: none"> <li>➤ Test certificates for hazardous substance locations<sup>2</sup></li> <li>➤ Stationary bulk container systems</li> <li>➤ Emergency management<sup>2</sup></li> <li>➤ Signage<sup>2</sup></li> <li>➤ Labelling, safety data sheets and packaging</li> </ul>
<b>1 July 2007</b>	Compliance required with emergency management controls <sup>2</sup> (fire extinguishers, response plans and secondary containment)
<b>1 January 2008</b>	Test certificates required for hazardous substance location <sup>2</sup>
<b>1 July 2008</b>	Report required from test certifier for existing stationary bulk container systems Compliance required with controls for: <ul style="list-style-type: none"> <li>➤ Labelling<sup>3,4</sup></li> <li>➤ Safety data sheets</li> <li>➤ Signage<sup>2</sup></li> <li>➤ Packaging</li> </ul>
<b>1 January 2009</b>	Full 5 year approved handler test certificate required
<b>1 July 2009</b>	Test certificates required for existing stationary bulk container systems
<b>31 December 2010</b>	Product labels are compliant to this date if they comply with the labelling requirements of Europe, Australia, USA or Canada <sup>4</sup>

1. A person with two years experience in handling hazardous substances can deem themselves as an approved handler to 31 December 2008.
2. Staged implementation provisions may not apply for approved handler test certificates, location test certificates, emergency management and signage if compliance is already required for a similar class of hazardous substance (see section 'If existing HSNO Provisions Apply').
3. Other than for substances that comply with the labelling requirements of Europe, Australia, USA or Canada.
4. A control proposes that a 4 year period be allowed for compliance with labelling, provided that the product labels comply with the regulatory requirements for labelling that apply in these countries.

### If Existing HSNO Provisions Apply

Where existing HSNO provisions apply for approved substances (e.g. dangerous goods transferred on 1 April 2004), then there will be no staged implementation for an approved handler test certificate, location test certificate, emergency management or signage if persons are already required to hold test certificates or have emergency management provisions and signage in place for the same class of substance. In this

situation, compliance should have already been achieved. Therefore, full compliance for the NOTS is required by 1 January 2007. All other provisions for staged implementation (e.g. labelling, packaging etc) will apply as set out above. Full staged implementation (including for test certificates, emergency management and signage) will apply if **new classes** of substances are transferred as NOTS.

For example, a person who imports or manufacturers a class 3.1 flammable NOTS will not receive staged implementation for test certificates, emergency management or signage if they also store class 3.1 flammables that are already HSNO approved substances and for which they require test certificates, emergency management and signage. If, however, they are manufacturing or storing NOTS that are of a different class (e.g. class 5 oxidising substances), then staged implementation will apply as set out above, but only for that new class.

### **Further Information**

Further details on staged implementation and general compliance requirements will be provided to notifiers in the lead-up to transfer. For other compliance information, you can contact the ERMA New Zealand Hazardous Substance Compliance Line, by:

Phone: 0800 376 234, or

Email [dginfo@ermanz.govt.nz](mailto:dginfo@ermanz.govt.nz).