

August, 2011 - MLPC International, a subsidiary of Arkema group located in the SW of France, has developed an expertise in the chemistry of accelerators for vulcanization, of which the production of guanidine.

MLPC INTERNATIONAL has taken the role of Lead Registrant for the Reach DPG dossier (NS, > 1000T). Registration partners in the consortium (including Michelin) or SIEF will rely on our main data files.

The full Reach dossier was sent to ECHA and is accessible on-line using the following link:
http://apps.echa.europa.eu/registered/data/dossiers/DISS-9877a14e-89ce-6031-e044-00144f67d031/DISS-9877a14e-89ce-6031-e044-00144f67d031_DISS-9877a14e-89ce-6031-e044-00144f67d031.html

Studies commissioned for the Reach dossier have explicitly proven that DPG (1,3 – diphenylguanidine – CAS# 102-06-7) was neither:

- Irritant dermal Skin Irrit 2 - H315 (in DSD Xi, R38)
- nor, Dangerous for a target organ – single exposure STOT SE 3 - H 335 (in DSD Xi, R37)
- nor, Reprotoxic: deletion of the character representation. 2 - H361 (in DSD Repr Cat. 3; R62)

The Acute Tox Inhalation 4 - H302 labelling will need to evolve into Acute Tox. 3-(More dangerous) H301 - Xn; R22 becomes T, R25.

The elimination of the "reproductive toxicity risk" has been proved through a new OECD 421 test (reproductive/Developmental toxicity screening test), commissioned by the DPG Reach consortium using a typical product (containing between 0.5 and 0.7% of aniline). DPG has no effect on the fertility of animals.

Accordingly, and taking into account the elements we have to this day, MLPC, as DPG consortium leader, has requested to the French authorities that these labellings be removed in Europe and around the world. The requested final labelling shall be (GHS/CLP and DSD):

Acute Toxicity oral Acute Tox. 3 – H301	T, R25
Eye Irritant Eye Irrit. 2 – H319	Xi, R36
Aquatic toxicity - chronic Aquatic Chronic 2 – H411	N; R51-53

A competitive Reach dossier was filed without this new data, allowing for a modification of the C&L. A detailed comparison of the two REACH dossier is available on request.

Moreover, we participated in the Canadian consultation for DPG (in the "Défi"). After data aggregation, the Canadian Government came to the explicit result that DPG was not dangerous to man and to the environment of Canada.

The danger labelling currently indicated for DPG is therefore outdated and there remains no issue for a bright future use in the Rubber industry.