

February 28<sup>th</sup> 2013

### **REACH Classification, Labelling and Packaging of Copper**

The Classification, Labelling and Packaging of copper, in both massive and powder forms, and of copper coated flakes has been assessed in the copper REACH dossier in accordance with Regulation (EC) 1907/2006. The same conclusions are also applicable to self-classification under the EU Classification, Labelling and Packaging (CLP) regulation (EC) 1272/2008.

ECI's REACH C&L proposal for copper follows the 2012 CLP guidance<sup>1</sup> and distinguishes the three forms put on the EU market:

1. Copper massive (particle size > 1mm and specific surface area < 0.67 mm<sup>2</sup>/mg):
  - > 99.90 % purity
  - No classification and no labelling for human health or the environment.
  
2. Copper powder (particle size > 10 µm and < 1 mm):
  - > 95 % copper, < 5 % Cu<sub>2</sub>O
  - Aquatic Acute 1, H400 Very toxic to aquatic life M-factor = 1;  
Aquatic chronic 3, H 412 Harmful to aquatic life with long term-effects.
  
3. Coated copper flakes (particle size in the range of 5 - 100 µm, with stearic acid coating):
  - > 93 % copper, < 3 % stearic acid and < 3 % Cu<sub>2</sub>O
  - Aquatic Acute 1, H400 Very toxic to aquatic life M-factor = 10;  
Aquatic chronic 2, H 411 Toxic to aquatic life with long term-effects.  
Acute Tox 4, H302, Harmful if swallowed

ECI's rationales for these proposals are contained in the Chemical Safety Report submitted to ECHA, as part of the joint updated submission dossier, on January 28<sup>th</sup>, 2013 by the Lead Registrant Aurubis.

According to Article 23 of CLP, metals in massive form and alloys benefit from a derogation from labelling requirements (i.e. they do not require labelling).

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<sup>1</sup> [http://echa.europa.eu/documents/10162/13562/clp\\_en.pdf](http://echa.europa.eu/documents/10162/13562/clp_en.pdf)