

## Christopher Thornton

---

**De:** ipreachcentrum <ip@reachcentrum.eu>  
**Envoyé:** lundi 7 novembre 2011 12:14  
**À:** ipreachcentrum  
**Objet:** To all members of the REACH SIEFs for manganese phosphates  
**Pièces jointes:** IP manganese phosphate SIPS 7-11-11.pdf

Dear all,

This email is to inform you of :

- ? the **proposal to “merge” the REACH SIEFs** for the following substances: Manganese hydrogen phosphate EINECS 257-147-0 and Manganese orthophosphate EINECS 233-341-0
- ? the **intended REACH Registration submissions for manganese phosphates** by the IP (Inorganic Phosphates) Consortium, submission dates and Lead Companies
- ? **sameness proposals (SIP)** for comments

### SIEF “merger”

The IP Consortium has carried out XRD/XRF tests on samples of the two substances cited above (Manganese hydrogen phosphate and Manganese orthophosphate) and has concluded that these are the same substance. We therefore propose to merge the two SIEFs and to submit a single Registration dossier.

One Joint Submission Object only will be created (Manganese hydrogen phosphate, EINECS 257-147-0). For companies having pre-registered EINECS 233-341-0 (and not Manganese hydrogen phosphate), after carrying out analysis to verify the sameness of their substance, they will simply register by joining the Joint Submission for Manganese hydrogen phosphate (EINECS 257-147-0), using their pre-registration number obtained for EINECS 257-147-0, and including a comment in the free text in IUCLID that the two SIEFs have been merged.

**Please verify that you agree with the attached Sameness Proposal (SIP) indicating for Manganese hydrogen phosphate (EINECS 257-147-0) under “Other EC numbers considered to be the same substance: EINECS 233-341-0”**

Chemetall GmbH, which is a Member of the Inorganic Phosphates Consortium, intends to register this substance in 2013, and has agreed to take the role of Lead Company.

### Registration deadlines and Lead Registrants for manganese phosphates

The IP Consortium intends to also register Manganese bis(dihydrogen phosphate), EINECS 242-520-2, in 2013, and **Chemetall GmbH has also agreed to act as Lead Registrant** for this substance.

In 2013, the IP Consortium does NOT intend to register Trimanganese bis(orthophosphate), EINECS 237-997-9 (intended registration: 2018)

### Sameness proposals (SIPs)

You will find attached sameness proposals for the manganese phosphates indicated above for 2013 REACH registration:

- Manganese bis(dihydrogen phosphate), EINECS 242-520-2
- Manganese hydrogen phosphate, EINECS 257-147-0

# Inorganic Phosphates Consortium Sameness Proposal for manganese phosphates

## Background information for ALL SUBSTANCES

- *there is no need to reply to this email if you AGREE with the proposal (this is to avoid generating large numbers of unnecessary emails)*
- *if you do NOT agree with the proposals below, of if you have any comment, this should be sent by **DEADLINE 15<sup>th</sup> December 2011** (in order to enable progress with dossier preparation to conform with REACH deadlines)*

Definition of substance sameness
<i>For all IP substances</i>
The Registration Dossier prepared, and in particular the hazard assessments will address the pure substance, but <b>will also cover the substance (as placed on the market) if and only if purity and impurities conform to the levels indicated in each specific proposal.</b>
These ranges of purity / impurities will be specified in the common part of the IUCLID dossier (non-confidential part of the Joint Registration submission, IUCLID \$4 – Physical and chemical properties – Endpoint summary) and for Classified Substances in the Substance Composition section (1.2) of the CSR (a model CSR will be provided by the IP Consortium, but is to be submitted separately by each Registrant)
Each registrant will further have to specify separately the impurities in their own product, in the company-specific (confidential) part of their Registration submission (IUCLID \$1.2).
If a Registrant's substance does not conform to these specifications then the Registrant will have to justify that the differences do not modify the IUCLID 5 (and CSR conclusions for Classified Substances) and do not require a different Classification and Labelling or different exposure scenarios. In this case, this information must be provided in the company specific (confidential) registration dossier, and may result in additional Fees being payable to ECHA.

### NOTE1: Hureaulite:

The three substances below are considered to be DIFFERENT from the naturally occurring mineral Hureaulite:

- $Mn^{2+}_5(PO_3OH)_2(PO_4)_2 \cdot 4H_2O$
- CAS 14654-09-2

### NOTE2: Manganese orthophosphate:

The IP Consortium has carried out XRD analysis of the substance “**Manganese orthophosphate**” EINECS 232-341-0 concluding that it is the same as IP35 Manganese hydrogen phosphate. Companies having Pre-Registered “Manganese orthophosphate” should carry out analysis of their product and we expect will then find that it corresponds to IP35 or to another one (or a mixture of) the substances below. They should then Register this (or these) substances using the PreRegistration number(s) obtained for “Manganese orthophosphate”.

**Please provide additional information where useful to complete these sameness proposals, and particularly wherever your product does not conform to the descriptions below.**

## INDEX OF MANGANESE SUBSTANCE IDENTITY PROPOSALS

IP34: manganese bis(dihydrogen phosphate) (MMangP) .....	2
IP35 (= IP61) : manganese hydrogen phosphate (DmangP) .....	3
IP33: Trimanganese bis(orthophosphate) TMangP .....	4

# IP34: manganese bis(dihydrogen phosphate) (MMangP)

Substance identification		
Type of substance	Composition	mono-constituent
	Origin	inorganic
Reference EC number (s)	242-520-2	
Other EC numbers considered to be the same substance		
EC name	Manganese bis(dihydrogen phosphate)	
Synonyms	Monomanganese phosphate Manganese (2+) diphosphate Manganous dihydrogen phosphate Phosphoric acid, manganese (2+) salt (2:1) Mazhef salt Manganese biphosphate Manganese phosphate monobasic Manganese-2-phosphate	
CAS number (s)	18718-07-5	
SMILES	[O-]P(=O)([O-])[O-].[O-]P(=O)([O-])[O-].[Mn+2]	
EU food legislation number / INS n°	N/A	
Molecular formula (or formulae)	H3O4P.1/2Mn      or MnO8P2            or H4MnO8P2	
Structure image or diagram (indicative)	<p style="text-align: center;">Mn<sup>2+</sup></p> <p style="text-align: center;"> <math>\begin{array}{c} \text{O}^- \\   \\ \text{O}=\text{P}-\text{OH} \\   \\ \text{OH} \end{array} \quad \quad \quad \begin{array}{c} \text{O}^- \\   \\ \text{O}=\text{P}-\text{OH} \\   \\ \text{OH} \end{array}</math> </p> <p style="text-align: center;">H<sub>2</sub>O   H<sub>2</sub>O   H<sub>2</sub>O   H<sub>2</sub>O</p>	
Molecular weight (or range)	249 (anhydrous) or 285(dihydrate) or 321(tetrahydrate)	
Granulometry range – modify if necessary	Less than 2% of particles are < 100µm in diameter. Considered not to pose an inhalation risk.	
pH range for aqueous solution	1% solution: pH 3.0 – 4.0 at 20.0 ± 0.5°C	
<b>Purity and impurities</b> (in all cases, expressed as % dry weight, that is excluding water):		
<b>GENERIC COMPOSITION</b> (please provide additional information in fields below if your substance does not conform):		
<b>Purity</b>	Typical purity of substance	99,5 %
	Lower content	99 %
	Higher content	c. 100 %
<b>Impurities in the substance</b>	<b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>	
	Phosphoric acid	Max 1%
	<i>Add additional lines where required</i>	
	<b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties	
	<b>Hazardous impurities other than those mentioned above (where applicable)</b>	<0.1%

# IP35 (= IP61) : manganese hydrogen phosphate (DmangP)

Substance identification		
Type of substance	Composition	mono-constituent
	Origin	inorganic
Reference EC number (s)		257-147-0
<b>Other EC numbers considered to be the same substance</b>		<b>233-341-0 (Manganese orthophosphate)</b>
EC name		Manganese hydrogen phosphate
Synonyms		Manganese orthophosphate Manganese (2+) phosphate Manganous phosphate Phosphoric acid, manganese salt Phosphoric acid, manganese salt (1:?)
CAS number (s)		51349-94-1 and 10124-54-6
SMILES		[Mn+2].[O-]P(=O)([O-])[O-]
EU food legislation number / INS n°		
Molecular formula (or formulae)		MnO4P or H3O4P.Mn (hydrate)
Structure image or diagram (indicative)		$\begin{array}{c} \text{PO}_3^{-2} \\   \\ \text{O}^- \end{array} \quad \text{Mn}^{2+}$
Molecular weight (or range)		150 (anhydrous) or 186 (dihydrate)
Granulometry range – modify if necessary		
		> 80% of particles are < 100µm in diameter. Considered to pose an inhalation risk.
pH range for 1% aqueous solution		1% solution: pH 4.0-5.5 at 20.0 ± 0.5°C
<b>Purity and impurities</b> (in all cases, expressed as % dry weight, that is excluding water):		
<b>GENERIC COMPOSITION</b> (please provide additional information in fields below if your substance does not conform):		
<b>Purity</b>	Typical purity of substance	99,5 %
	Lower content	99 %
	Higher content	c. 100 %
<b>Impurities in the substance</b>	<b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>	
	<i>Add additional lines where required</i>	
<b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties		
<b>Hazardous impurities other than those mentioned above (where applicable)</b>		<0.1%

# IP33: Trimanganese bis(orthophosphate) TMangP

**NOTE: this substance will NOT be Registered by the IP Consortium in 2013 (expected Registration 2018)**

Substance identification		
Type of substance	Composition	mono-constituent
	Origin	inorganic
Reference EC number (s)		237-997-9
Other EC numbers considered to be the same substance		
EC name		Trimanganese bis(orthophosphate)
Synonyms		Trimanganese phosphate 3-hydrate Manganese(II) phosphate Manganous phosphate, tribasic;
CAS number (s)		14154-09-7
SMILES		
EU food legislation number / INS n°		N/A
Molecular formula (or formulae)		Mn <sub>3</sub> O <sub>8</sub> P <sub>2</sub> Or H <sub>3</sub> O <sub>4</sub> P. 3/2Mn
Structure image or diagram (indicative)		
Molecular weight (or range)		355 or 361 (hydrate)
Granulometry range – modify if necessary		
pH range for aqueous solution		
<b>Purity and impurities</b> (in all cases, expressed as % dry weight, that is excluding water):		
<b>GENERIC COMPOSITION</b> (please provide additional information in fields below if your substance does not conform):		
<b>Purity</b>	Typical purity of substance	
	Lower content	
	Higher content	
<b>Impurities in the substance</b>	<b>The substance may contain the following impurities, derived from the production process, each one present at the concentrations indicated below :</b>	
	<i>Add additional lines where required</i>	
	<b>All other impurities &gt; 1%</b> are other inorganic phosphates or other related inorganic substances, similar to the Registered substance, and which do not significantly affect its toxicological and ecotoxicological properties	
	<b>Hazardous impurities other than those mentioned above (where applicable)</b>	<0.1%

**Please send any comment or addition to these Sameness Proposals by 15<sup>th</sup> December 2011 latest.**

**Please verify that your products, as placed on the market, are conform to the specifications in these Sameness Proposals (eg. granulometry, pH, impurities ...),** because if they are not then they will not be covered by the Joint Submission dossier and/or you will have to provide (in your company-specific Registration submission) specific evidence and documentation to justify that the conclusions of this dossier apply to your substance despite its differences.

**Please note that no reply to this email, or no comment from you, by 15<sup>th</sup> December 2011, is considered as acceptance of this proposal to “merge” these two SIEFs, acceptance of the proposed Registration submission dates, of the proposed Lead Company and of the proposed Sameness Proposals.**

### **About the IP Consortium**

The REACH Registration Dossier development and management for these manganese phosphates will be carried out by the Inorganic Phosphates Consortium (IP), which is also managing (2013, 2018) or has managed (2010) Registration for some 50 other inorganic phosphates and for phosphoric acid. By developing these dossiers together, and in cooperation with Consortia covering other related substances (in particular other manganese substances) significant time and cost savings will be achieved through grouping of substances and read-across. Full information about the Consortium, including SIEF Agreement Contract, financial and dossier access conditions, list of substances covered, etc, is available at:

<http://www.reachcentrum.eu/EN/consortium-management/consortia-under-reach/ip-reach-consortium.aspx>

Contact: [ip@reachcentrum.eu](mailto:ip@reachcentrum.eu)