

MOCRINIS II Brussels October 18, 2017

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(III)



Why MOCRINIS?

Mineral Oil:

- o is it an issue of Mineral Oil or hydrocarbons in general?
- Is it about products or fractions of hydrocarbons?

Cross Industry:

- Is not only about printing inks anymore
- Hydrocarbon complex substances are used in different downstream industries regulated by different legislations

Issues:

- Not easily resolved due to the complex nature of the substances
- Overlapping hydrocarbon ranges of complex substances (and background hydrocarbons)
- Toxicological interpretation of available studies
- Differences in analytical procedures to ensure compliance
- What are the practical approaches suggested?



- Follow up of MOCRINIS I
- Facilitate a discussion forum with stakeholders
- Present CONCAWE point of view
- Have a <u>constructive</u> discussion and listen to others
- Gain <u>clarity</u> on the issues
- Hazard and risk assessment based on <u>science</u>
- Appropriate regulatory approach
- Review EFSA's recommendations and 2017 studies on mineral oils and waxes
- Present CONCAWE and EWF action plan

MOCRINIS I overlapping issues



Different kind of oils are used in applications (e.g. printing inks) supported by REACH. Newspapers are printed with MO based inks. Hydrocarbons may migrate from cardboard manufactured from recycled newspaper into food.

Mineral oils follow food legislation procedures which establish and Acceptable Daily Intake. The ADI should be based on relevant data for risk assessment and applicable to food related applications of mineral oils.

Analytical methods for hydrocarbons can't distinguish between hydrocarbon products or sources. Validated methods should be established.

MOCRINIS II overlapping issues



Different kind of oils and related products are used in applications supported by overlapping regulatory frameworks

e.g. REACH, EFSA, FDA

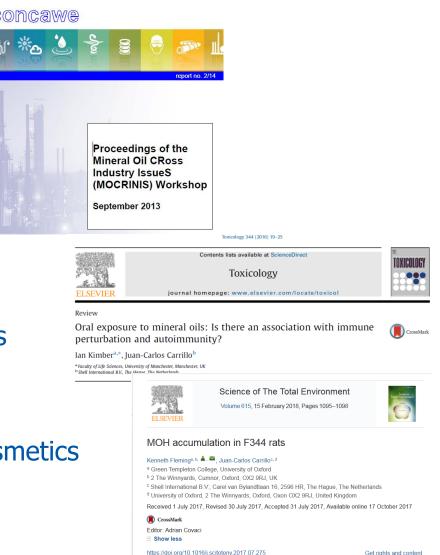
MOSH and MOAH paradigm has diffused the lines between mineral oil related products and their lawful and safe applications; with analytical hydrocarbon fractions as a measure of contamination

Analytical methods for hydrocarbons can't distinguish between hydrocarbon products or sources; intended or un-intended uses.

paralysis



CONCAWE What has happened since MOCRINIS I – Sep.2013 MOCRINIS I report published MOCRINIS stakeholder forum Platform to engage with industry sectors on MO issues Exchange of information Joint projects (e.g. Tennant data base) New CONCAWE task force, STF-33 was set up in 2015 CONCAWE and EWF member companies Prioritize issues related to CONCAWE and EWF products Autoimmunity effect of MO Understanding of MOAH Support the use of Pharmacopeia grade products in cosmetics Exposure data base project Technical specification dossier project Reproduction permitted with due acknowledgement





- Generic term used to group several petroleum derived liquids with "oil-like" viscosity
- Manufactured by vacuum distillation of the residue from atmospheric distillation.
- ~ 40 substances (identifiers or CAS number) which could be regarded as "mineral oil" with boiling points from 300°C to 700°C.
- Differ in physical chemical properties (e.g. viscosity) and chemical composition (e.g. aromatic content).
- Because of thousands of isomers, MO can't be described with a single chemical formula.
- Mineral oils are described as complex substances of Unknown or Variable composition, Complex reaction products or Biological materials, or shortly UVCB.
- Mineral oil is matrix, a single entity, with its own intrinsic properties behaving as a (complex) substance.
 - hydrocarbon constituents follow a physical chemical pattern
 - varying according to crude oil
 - controlled manufacture,
- ▶ In the EU, by law "mineral oils" are UVCBs and not mixtures.
- A mixture are intentionally blended to achieve a certain composition.
- Mineral oil is a substance

- Hydrocarbon solvents have a different manufacturing process which distinguishes them from mineral oil, with their chain lengths up to C20.
- Because of this the MOSH-MOAH terminology does not apply to hydrocarbon solvents.



Chromatography context:

Mineral Oil Saturated Hydrocarbons - MOSH:

The "unresolved complex mixture" of aliphatic hydrocarbons between C20 and C35, containing multibranched saturated and alkylated multiple ring naphtenic alkanes; the carbon numbers are defined by the elution range respectively the retention time of the corresponding n-alkanes in a gas chromatographic analysis on a dimethylpolysiloxane coated column.

- MOSH is used as a chromatographic measure of the alkane content of an oil
- The concern around long term toxicity of mineral oil is derived from observations in animal experiments which are extrapolated to the human situation
- These adverse effects have been extrapolated to humans and serve as the basis for the health concern to the MOSH fraction
- MOSH is a fraction, not a substance on the market.



Chromatography context:

Mineral Oil Aromatic Hydrocarbons - MOAH:

(Highly alkylated) aromatic hydrocarbons with carbon numbers between C20 and C35, of one or more aromatic rings; the carbon numbers are defined by the elution range respectively the retention time of the corresponding n-alkanes in a gas chromatographic analysis on a dimethylpolysiloxane coated column.

- MOAH is used as a chromatographic measure of the aromatic content of an oil
- It is considered as an indicator of the presence of unrefined petroleum based products
- The concern is based on the possibility that MOAH fraction containing 3-7 membered rings may be potentially carcinogenic
- MOAH is a fraction, not a substance on the market.



- MOSH and MOAH are vague terms, their interpretation is highly contextual
- MOSH and MOAH fractions do not correspond to petroleum products that are placed on the market
- These fractions may contain constituents coming from products of different degrees of refining and purity
- Furthermore, these fractions can also be found in products of other origin than mineral oil, for example, n-alkanes of natural origin found in fruits and vegetables
- MOSH and MOAH is contextual: impossibility of tracing their origin and the health risk they pose
 - MOAH can be harmless or of concern deepening on the origin.
- There are petroleum derived products that are lawfully used (e.g. cosmetic and food contact).
 - refined products are safe
 - presence of MOSH and MOAH is expected, unavoidable
 - no reason for suspecting non-compliance or health risk

The MOSH and MOAH "meaning" is subject of *when, what* and *how* you use it.



- Understand how our products are manufactured
- Regulatory overlap according to specifications
- Latest MOSH and MOAH toxicological interpretation
- What are the regulatory consequences due to new toxicological insight
 Way forward



Thank you

