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How to identify a substance that consists of a 'mixture of isomers'

Introduction

A substance is manufactured as a 'mixture of isomers', previously covered by the EINECS entries of the individual isomers.

Composition

The substance, consisting of two isomers (A and B), is manufactured with the following composition:

| Constituents | EC number | CAS number | Concentration range (%) | Typical concentration (%) |
|---|-----------|------------|-------------------------|---------------------------|
| Isomer A: 2,2'-[[[4-methyl-1H-benzotriazol-1-yl)methyl]imino]bisethanol | 279-502-9 | 80584-89-0 | 50 - 70 | 60 |
| Isomer B: 2,2'-[[[5-methyl-1H-benzotriazol-1-yl)methyl]imino]bisethanol | 279-501-3 | 80584-88-9 | 30 - 50 | 40 |

Identification

Since both constituents in the substance are present at a concentration $\geq 10\%$ and $< 80\%$, the naming should follow that for a multi-constituent substance. Following the convention explained in the [Guidance on identification and naming of substances under REACH and CLP](#), the substance is named as a "reaction mass" of isomers A and B:

Reaction mass of 2,2'-[[[4-methyl-1H-benzotriazol-1-yl)methyl]imino]bisethanol and 2,2'-[[[5-methyl-1H-benzotriazol-1-yl)methyl]imino]bisethanol

No EC number exists for the substance, as the reaction mass has not been reported under EINECS. However, the substance is covered by the EINECS entries of its constituents (EC: 279-502-9, 279-501-3). Therefore, the reaction mass is a phase-in substance.

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Background note

Before REACH, the Dangerous Substances Directive (Directive 67/548/EEC) regulated the placing of substances on the market. The substance was covered by the EINECS entries of the two individual isomers. In contrast, REACH requires the registration of manufactured or imported substances. However, if a substance consisting of different isomeric forms is registered as a multi-constituent substance, there is no need to test the substance as such, if the hazard profile of the substance can be sufficiently described by the information available for the individual isomers.