

Comments to Manganese (II) Sulphate
- part of the LOUS list

Page	Statement	Comment / suggested addition or change
30 (penultimate bullet point)	This is not entirely clear when searching ECHA web-site	This should be clarified following update of the harmonized classification in an ATP EU regulation according to the lead registrant notification. The initiative of this update belongs to ECHA (Art 37 of CLP regulation)
33 (3.1.1)	Pyrolusyte	Pyrolusite
55 (paragraph 6)	positive sensitisation test results with manganese dioxide were found in 2 of the workers.	positive sensitisation test results with manganese dioxide (a very insoluble compound with different valency from MnSO ₄) were found in 2 of the workers.
55 (penultimate paragraph)	...along with impotence and loss of libido.	Note: these are considered as "secondary effects"
55 (final paragraph)	... associated with low-level manganese exposure.	A duration perspective is required. More correct to write "...associated with low level manganese exposure over a long period of time."
56 (second paragraph)	By dividing the IDR with the average duration of the workers' exposure to manganese (5.3 years) a LOAEL of 0.15 mg/m ³ can be derived for neurotoxic effects of manganese (US-EPA, 1996).	This study is based on MnO ₂ not MnSO ₄ . MnO ₂ has a different valency (+4) compared with MnSO ₄ (+2) meaning that the toxicokinetics of the two substances are different.
59 (second paragraph)	notes that a two-generation inhalation study on manganese chloride, which might be used in a read-across approach, now exists	This new study clearly demonstrates no reprotoxic effects
62 (second paragraph)	reference to US-EPA 1996	This situation has recently changed with US-EPA alignment with the ATSDR approach and leading to a reference concentration (RfC) level at 0,3µg/m ³ . While the EPA Office of Air has adopted the ATSDR value, EPA has not removed the old IRIS RfC value as IRIS is managed by a separate EPA office (the Office of Research and Development)

The International Manganese Institute (IMnI) currently represents 84 members from over 30 countries. The manganese industry as a whole employs, directly and indirectly, around 400,000 people worldwide (EU: 19,000) and accounts for a global economic value of UD\$170 billion (EU: US\$ 12 billion). The Manganese REACH Administration, or Mn REACH Consortium, has 42 EU-based Members.