



Rum (Ethanol Solution) between 24% and 70% vol

Safety Data Sheet

according to the REACH Regulation (EC) 1907/2006 amended by Regulation (EU) 2020/878
Issue date: 08/03/2022 Version: 1.0

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product form : Mixture
Product name : Rum (Ethanol Solution) between 24% and 70% vol

1.2. Relevant identified uses of the substance or mixture and uses advised against

1.2.1. Relevant identified uses

Intended for general public
Main use category : Professional use, Consumer use
Use of the substance/mixture : Alcoholic beverages, Odour agents, Flavouring agents etc.

1.2.2. Uses advised against

No additional information available

1.3. Details of the supplier of the safety data sheet

E&A Scheer B.V.
Herengracht 316
NL- 1016 CD Amsterdam
The Netherlands
T +31 (0)20 624 34 12 - F +31 (0)20 622 09 76
info@rum.nl - www.rum.nl

1.4. Emergency telephone number

Country	Organisation/Company	Address	Emergency number	Comment
United Kingdom	National Poisons Information Service (Belfast Centre) Royal Victoria Hospital	Grosvenor Road BT12 6BA Belfast	0344 892 0111	Only for healthcare professionals

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification according to Regulation (EC) No. 1272/2008 [CLP]

Flammable liquids, Category 2 H225
Serious eye damage/eye irritation, Category 2 H319
Full text of H- and EUH-statements: see section 16

Adverse physicochemical, human health and environmental effects

Highly flammable liquid and vapour. Causes serious eye irritation.

2.2. Label elements

Labelling according to Regulation (EC) No. 1272/2008 [CLP]

Hazard pictograms (CLP) :



GHS02

GHS07

Signal word (CLP) :

Danger

Hazard statements (CLP) :

H225 - Highly flammable liquid and vapour.
H319 - Causes serious eye irritation.

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Precautionary statements (CLP)	: P101 - If medical advice is needed, have product container or label at hand. P102 - Keep out of reach of children. P210 - Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. P264 - Wash hands thoroughly after handling. P280 - Wear eye protection. P501 - Dispose of contents and container to hazardous or special waste collection point, in accordance with local, regional, national and/or international regulation.
Extra phrases	: For professional users only.

2.3. Other hazards

This substance/mixture does not meet the PBT criteria of REACH regulation, annex XIII
This substance/mixture does not meet the vPvB criteria of REACH regulation, annex XIII

The mixture does not contain substance(s) included in the list established in accordance with Article 59(1) of REACH for having endocrine disrupting properties, or is not identified as having endocrine disrupting properties in accordance with the criteria set out in Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at a concentration equal to or greater than 0,1 %

SECTION 3: Composition/information on ingredients

3.1. Substances

Not applicable

3.2. Mixtures

Name	Product identifier	Conc. (% w/w)	Classification according to Regulation (EC) No. 1272/2008 [CLP]
ethanol; ethyl alcohol	CAS-No.: 64-17-5 EC-No.: 200-578-6 EC Index-No.: 603-002-00-5 REACH-no: 01-2119457610-43	≥ 24 - < 70	Flam. Liq. 2, H225 Eye Irrit. 2, H319

Specific concentration limits:

Name	Product identifier	Specific concentration limits
ethanol; ethyl alcohol	CAS-No.: 64-17-5 EC-No.: 200-578-6 EC Index-No.: 603-002-00-5 REACH-no: 01-2119457610-43	(50 ≤C ≤ 100) Eye Irrit. 2, H319

Full text of H- and EUH-statements: see section 16

SECTION 4: First aid measures

4.1. Description of first aid measures

First-aid measures general	: Never give anything by mouth to an unconscious person. If you feel unwell, seek medical advice (show the label where possible).
First-aid measures after inhalation	: Remove person to fresh air and keep comfortable for breathing. Get medical advice/attention if you feel unwell.
First-aid measures after skin contact	: Rinse skin with water/shower. Remove contaminated clothes. If skin irritation or rash occurs: Get medical advice/attention.
First-aid measures after eye contact	: Immediately flush eyes thoroughly with water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

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First-aid measures after ingestion : Rinse mouth. Do NOT induce vomiting. Get medical advice/attention if you feel unwell.

4.2. Most important symptoms and effects, both acute and delayed

Symptoms/effects after skin contact : Prolonged or repeated contact may cause skin to become dry or cracked.
Symptoms/effects after eye contact : Causes serious eye irritation.

4.3. Indication of any immediate medical attention and special treatment needed

Treat symptomatically.

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media : Foam. Dry powder. Carbon dioxide. Water spray. Sand.
Unsuitable extinguishing media : Do not use a heavy water stream.

5.2. Special hazards arising from the substance or mixture

Fire hazard : Highly flammable liquid and vapour.
Explosion hazard : No direct explosion hazard.
Hazardous decomposition products in case of fire : For further information, refer to section 10 : "Stability and Reactivity".

5.3. Advice for firefighters

Firefighting instructions : Use water spray or fog for cooling exposed containers. Exercise caution when fighting any chemical fire. Prevent fire fighting water from entering the environment.
Protection during firefighting : Do not enter fire area without proper protective equipment, including respiratory protection.
Other information : Prevent fire fighting water from entering the environment.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

6.1.1. For non-emergency personnel

Emergency procedures : Evacuate unnecessary personnel. No open flames, no sparks, and no smoking.

6.1.2. For emergency responders

Protective equipment : Equip cleanup crew with proper protection. For further information refer to section 8: "Exposure controls/personal protection".
Emergency procedures : Ventilate area.

6.2. Environmental precautions

Do not allow to enter drains or water courses.

6.3. Methods and material for containment and cleaning up

Methods for cleaning up : Take up liquid spill into absorbent material. Mechanically recover the product. Notify authorities if product enters sewers or public waters.
Other information : Dispose of materials or solid residues at an authorized site.

6.4. Reference to other sections

For further information refer to section 8: "Exposure controls/personal protection". Concerning disposal elimination after cleaning, see section 13.

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SECTION 7: Handling and storage

7.1. Precautions for safe handling

- Precautions for safe handling : Concerning personal protective equipment to use, see section 8. Provide good ventilation in process area to prevent formation of vapour. Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Ground/bond container and receiving equipment. Use only non-sparking tools. Take precautionary measures against static discharge. Flammable vapours may accumulate in the container. Wear personal protective equipment.
- Hygiene measures : Do not eat, drink or smoke when using this product. Always wash hands after handling the product.

7.2. Conditions for safe storage, including any incompatibilities

- Technical measures : Ground/bond container and receiving equipment.
- Storage conditions : Keep only in the original container in a cool well ventilated place. Keep container closed when not in use. Store in a well-ventilated place. Keep cool. Keep container tightly closed.
- Heat and ignition sources : Keep away from heat and direct sunlight.
- Packaging materials : Store in glass, stainless steel, plastic or epoxy lined receptacles. Unsuitable materials: copper, Aluminium.

7.3. Specific end use(s)

No additional information available

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

8.1.1 National occupational exposure and biological limit values

ethanol; ethyl alcohol (64-17-5)	
United Kingdom - Occupational Exposure Limits	
Local name	Ethanol
WEL TWA (OEL TWA) [1]	1920 mg/m ³
WEL TWA (OEL TWA) [2]	1000 ppm
WEL STEL (OEL STEL)	5760 mg/m ³ (calculated)
WEL STEL (OEL STEL) [ppm]	3000 ppm (calculated)
Regulatory reference	EH40/2005 (Fourth edition, 2020). HSE

8.1.2. Recommended monitoring procedures

No additional information available

8.1.3. Air contaminants formed

No additional information available

8.1.4. DNEL and PNEC

No additional information available

8.1.5. Control banding

No additional information available

8.2. Exposure controls

8.2.1. Appropriate engineering controls

Appropriate engineering controls:

Ensure good ventilation of the work station.

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8.2.2. Personal protection equipment

Personal protective equipment:

Safety glasses.

Personal protective equipment symbol(s):



8.2.2.1. Eye and face protection

Eye protection:

Safety glasses. DIN EN 166

8.2.2.2. Skin protection

Skin and body protection:

Wear suitable protective clothing. CEN : EN 340; EN 369; EN 465

Hand protection:

In case of repeated or prolonged contact wear gloves. Polyvinylchloride (PVC). 0.11 mm. EN 374

8.2.2.3. Respiratory protection

Respiratory protection:

No special respiratory protection equipment is recommended under normal conditions of use with adequate ventilation. In case of inadequate ventilation wear respiratory protection. EN 143

8.2.2.4. Thermal hazards

No additional information available

8.2.3. Environmental exposure controls

Environmental exposure controls:

Avoid release to the environment.

Other information:

Do not eat, drink or smoke during use.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

Physical state	: Liquid
Colour	: various colors.
Odour	: characteristic.
Odour threshold	: Not available
Melting point	: -130 – -112 °C
Freezing point	: Not available
Boiling point	: > 78.3 °C
Flammability	: Not available
Explosive limits	: Not available
Lower explosive limit (LEL)	: Not available
Upper explosive limit (UEL)	: Not available
Flash point	: > 21 °C (70%) 35 %vol. 27,5°C 40 %vol. 26°C 45 %vol. 25°C 50 %vol. 24°C 55 %vol. 23°C 60 %vol. 22°C 65 %vol. 21,5°C 70 %vol. 21°C
Auto-ignition temperature	: 363 °C
Decomposition temperature	: Not available

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pH	: 4 – 8.5
Viscosity, kinematic	: Not available
Solubility	: Soluble in water.
Partition coefficient n-octanol/water (Log Kow)	: Not available
Vapour pressure	: 3.3 – 19 % v/v
Vapour pressure at 50 °C	: Not available
Density	: Not available
Relative density	: 35 %vol. 0,95559 40 %vol. 0,94805 45 %vol. 0,93954 55 %vol. 0,91996 60 %vol. 0,90911 65 %vol. 0,89765 70 %vol. 0,88556
Relative vapour density at 20 °C	: 59
Particle size	: Not applicable
Particle size distribution	: Not applicable
Particle shape	: Not applicable
Particle aspect ratio	: Not applicable
Particle aggregation state	: Not applicable
Particle agglomeration state	: Not applicable
Particle specific surface area	: Not applicable
Particle dustiness	: Not applicable

9.2. Other information

9.2.1. Information with regard to physical hazard classes

No additional information available

9.2.2. Other safety characteristics

No additional information available

SECTION 10: Stability and reactivity

10.1. Reactivity

Highly flammable liquid and vapour.

10.2. Chemical stability

Stable under normal conditions.

10.3. Possibility of hazardous reactions

No dangerous reactions known.

10.4. Conditions to avoid

Extremely high or low temperatures. Keep out of direct sunlight. Avoid contact with hot surfaces. Heat. No flames, no sparks. Eliminate all sources of ignition.

10.5. Incompatible materials

Strong oxidizing agents.

10.6. Hazardous decomposition products

Combustion generates: Carbon oxides (CO, CO₂).

SECTION 11: Toxicological information

11.1. Information on hazard classes as defined in Regulation (EC) No 1272/2008

Acute toxicity (oral) : Not classified

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Acute toxicity (dermal) : Not classified
Acute toxicity (inhalation) : Not classified

ethanol; ethyl alcohol (64-17-5)	
LD50 oral rat	7060 mg/kg
LD50 oral	10470 mg/kg bodyweight
LD50 dermal	15800 mg/kg bodyweight
LC50 Inhalation - Rat	133.8 mg/l/4h
LC50 Inhalation - Rat (Dust/Mist)	> 99999 mg/l
ATE oral	7060 mg/kg bodyweight
ATE dermal	15800 mg/kg bodyweight
ATE vapours	133.8 mg/l/4h
ATE dust/mist	133.8 mg/l/4h

Skin corrosion/irritation : Not classified
pH: 4 – 8.5
Serious eye damage/irritation : Causes serious eye irritation.
pH: 4 – 8.5
Respiratory or skin sensitisation : Not classified
Germ cell mutagenicity : Not classified
Carcinogenicity : Not classified

ethanol; ethyl alcohol (64-17-5)	
IARC group	1 - Carcinogenic to humans
Reproductive toxicity	: Not classified
STOT-single exposure	: Not classified
STOT-repeated exposure	: Not classified
Aspiration hazard	: Not classified

11.2. Information on other hazards

No additional information available

SECTION 12: Ecological information

12.1. Toxicity

Hazardous to the aquatic environment, short-term (acute) : Not classified
Hazardous to the aquatic environment, long-term (chronic) : Not classified

ethanol; ethyl alcohol (64-17-5)	
LC50 - Fish [1]	14200 mg/l
EC50 - Crustacea [1]	5463 mg/l
EC50 - Other aquatic organisms [1]	5012 mg/l waterflea
EC50 - Other aquatic organisms [2]	275 mg/l
ErC50 algae	1000 mg/l
NOEC chronic crustacea	9.6 mg/l

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12.2. Persistence and degradability

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Persistence and degradability	Not established.
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12.3. Bioaccumulative potential

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Bioaccumulative potential	Not established.
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ethanol; ethyl alcohol (64-17-5)

Partition coefficient n-octanol/water (Log Pow)	-0.32
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12.4. Mobility in soil

No additional information available

12.5. Results of PBT and vPvB assessment

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This substance/mixture does not meet the PBT criteria of REACH regulation, annex XIII

This substance/mixture does not meet the vPvB criteria of REACH regulation, annex XIII

12.6. Endocrine disrupting properties

No additional information available

12.7. Other adverse effects

Additional information : Avoid release to the environment.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Product/Packaging disposal recommendations : Dispose in a safe manner in accordance with local/national regulations.

Additional information : Empty containers should be taken for recycling, recovery or waste in accordance with local regulation. Flammable vapours may accumulate in the container.

Ecology - waste materials : Avoid release to the environment.

SECTION 14: Transport information






In accordance with ADR / IMDG / IATA / ADN / RID

ADR	IMDG	IATA	ADN	RID
14.1. UN number or ID number				
UN 3065	UN 3065	UN 3065	UN 3065	UN 3065
14.2. UN proper shipping name				
ALCOHOLIC BEVERAGES	ALCOHOLIC BEVERAGES	Alcoholic beverages	ALCOHOLIC BEVERAGES	ALCOHOLIC BEVERAGES
Transport document description				
UN 3065 ALCOHOLIC BEVERAGES, 3, III, (D/E)	UN 3065 ALCOHOLIC BEVERAGES, 3, III	UN 3065 Alcoholic beverages, 3, III	UN 3065 ALCOHOLIC BEVERAGES, 3, III	UN 3065 ALCOHOLIC BEVERAGES, 3, III
14.3. Transport hazard class(es)				
3	3	3	3	3

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ADR	IMDG	IATA	ADN	RID
				
14.4. Packing group				
III	III	III	III	III
14.5. Environmental hazards				
Dangerous for the environment: No	Dangerous for the environment: No Marine pollutant: No	Dangerous for the environment: No	Dangerous for the environment: No	Dangerous for the environment: No
No supplementary information available				

14.6. Special precautions for user

Overland transport

Classification code (ADR)	: F1
Special provisions (ADR)	: 144, 145, 247
Limited quantities (ADR)	: 5I
Excepted quantities (ADR)	: E1
Packing instructions (ADR)	: P001, IBC03, R001
Special packing provisions (ADR)	: PP2
Mixed packing provisions (ADR)	: MP19
Portable tank and bulk container instructions (ADR)	: T2
Portable tank and bulk container special provisions (ADR)	: TP1
Tank code (ADR)	: LGBF
Vehicle for tank carriage	: FL
Transport category (ADR)	: 3
Special provisions for carriage - Packages (ADR)	: V12
Special provisions for carriage - Operation (ADR)	: S2
Hazard identification number (Kemler No.)	: 30
Orange plates	:



Tunnel restriction code (ADR)	: D/E
EAC code	: •2Y

Transport by sea

Special provisions (IMDG)	: 144, 145, 247
Limited quantities (IMDG)	: 5 L
Excepted quantities (IMDG)	: E1
Packing instructions (IMDG)	: P001
Special packing provisions (IMDG)	: PP2
IBC packing instructions (IMDG)	: IBC03
Tank instructions (IMDG)	: T2
Tank special provisions (IMDG)	: TP1
EmS-No. (Fire)	: F-E
EmS-No. (Spillage)	: S-D
Stowage category (IMDG)	: A

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Properties and observations (IMDG) : Alcoholic beverages containing more than 24% alcohol but not more than 70% by volume, when transported as part of the manufacturing process, may be transported in wooden barrels with a capacity of more than 250 litres and not more than 500 litres meeting the general requirements of 4.1.1, as appropriate, on the following conditions: 1. the wooden barrels should be checked and tightened before filling; 2. sufficient ullage (not less than 3%) should be left to allow for the expansion of the liquid; 3. the wooden barrels should be transported with the bungholes pointing upwards; 4. the wooden barrels should be transported in containers meeting the requirements of the International Convention for Safe Containers (CSC), as amended. Each wooden barrel should be secured in custom-made cradles and should be wedged by appropriate means to prevent them from being displaced in any way during transport; and 5. when carried on board ships, the containers should be stowed in open cargo spaces or in enclosed cargo spaces complying with the requirements for class 3 flammable liquids with a flashpoint of 23°C c.c. or less in regulation II-2/19 of SOLAS, 74, as amended.

MFAG-No : 127

Air transport

PCA Excepted quantities (IATA) : E1
PCA Limited quantities (IATA) : Y344
PCA limited quantity max net quantity (IATA) : 10L
PCA packing instructions (IATA) : 355
PCA max net quantity (IATA) : 60L
CAO packing instructions (IATA) : 366
CAO max net quantity (IATA) : 220L
Special provisions (IATA) : A9, A58
ERG code (IATA) : 3L

Inland waterway transport

Classification code (ADN) : F1
Special provisions (ADN) : 144, 145, 247
Limited quantities (ADN) : 5 L
Excepted quantities (ADN) : E1
Equipment required (ADN) : PP, EX, A
Ventilation (ADN) : VE01
Number of blue cones/lights (ADN) : 0

Rail transport

Classification code (RID) : F1
Special provisions (RID) : 144, 145, 247
Limited quantities (RID) : 5L
Excepted quantities (RID) : E1
Packing instructions (RID) : P001, IBC03, R001
Special packing provisions (RID) : PP2
Mixed packing provisions (RID) : MP19
Portable tank and bulk container instructions (RID) : T2
Portable tank and bulk container special provisions (RID) : TP1
Tank codes for RID tanks (RID) : LGBF
Transport category (RID) : 3
Special provisions for carriage – Packages (RID) : W12
Colis express (express parcels) (RID) : CE4
Hazard identification number (RID) : 30

14.7. Maritime transport in bulk according to IMO instruments

Not applicable

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SECTION 15: Regulatory information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

15.1.1. EU-Regulations

EU restriction list (REACH Annex XVII)		
Reference code	Applicable on	Entry title or description
3(a)	Rum (Ethanol Solution) between 24% and 70% vol ; ethanol; ethyl alcohol	Substances or mixtures fulfilling the criteria for any of the following hazard classes or categories set out in Annex I to Regulation (EC) No 1272/2008: Hazard classes 2.1 to 2.4, 2.6 and 2.7, 2.8 types A and B, 2.9, 2.10, 2.12, 2.13 categories 1 and 2, 2.14 categories 1 and 2, 2.15 types A to F
3(b)	Rum (Ethanol Solution) between 24% and 70% vol ; ethanol; ethyl alcohol	Substances or mixtures fulfilling the criteria for any of the following hazard classes or categories set out in Annex I to Regulation (EC) No 1272/2008: Hazard classes 3.1 to 3.6, 3.7 adverse effects on sexual function and fertility or on development, 3.8 effects other than narcotic effects, 3.9 and 3.10
40.	ethanol; ethyl alcohol	Substances classified as flammable gases category 1 or 2, flammable liquids categories 1, 2 or 3, flammable solids category 1 or 2, substances and mixtures which, in contact with water, emit flammable gases, category 1, 2 or 3, pyrophoric liquids category 1 or pyrophoric solids category 1, regardless of whether they appear in Part 3 of Annex VI to Regulation (EC) No 1272/2008 or not.

Contains no substance on the REACH candidate list

Contains no REACH Annex XIV substances

Contains no substance subject to Regulation (EU) No 649/2012 of the European Parliament and of the Council of 4 July 2012 concerning the export and import of hazardous chemicals.

Contains no substance subject to Regulation (EU) No 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants

Contains no substance subject to Regulation (EU) 2019/1148 of the European Parliament and of the Council of 20 June 2019 on the marketing and use of explosives precursors.

Child-resistant fastening : Not applicable

Tactile warning : Applicable

Directive 2012/18/EU (SEVESO III)

Seveso III Part I (Categories of dangerous substances)	Qualifying quantity (tonnes)	
	Lower-tier	Upper-tier
P5a FLAMMABLE LIQUIDS — Flammable liquids, Category 1, or — Flammable liquids Category 2 or 3 maintained at a temperature above their boiling point, or — Other liquids with a flash point ≤ 60 °C, maintained at a temperature above their boiling point	10	50
P5b FLAMMABLE LIQUIDS — Flammable liquids Category 2 or 3 where particular processing conditions, such as high pressure or high temperature, may create major-accident hazards, or — Other liquids with a flash point ≤ 60 °C where particular processing conditions, such as high pressure or high temperature, may create major-accident hazards	50	200
P5c FLAMMABLE LIQUIDS Flammable liquids, Categories 2 or 3 not covered by P5a and P5b	5000	50000

15.1.2. National regulations

No additional information available

15.2. Chemical safety assessment

No chemical safety assessment has been carried out

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SECTION 16: Other information

Abbreviations and acronyms:	
CLP	Classification Labelling Packaging Regulation; Regulation (EC) No 1272/2008
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (EC) No 1907/2006
PBT	Persistent Bioaccumulative Toxic
vPvB	Very Persistent and Very Bioaccumulative
ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
IATA	International Air Transport Association
IMDG	International Maritime Dangerous Goods
RID	Regulations concerning the International Carriage of Dangerous Goods by Rail
LC50	Median lethal concentration
LD50	Median lethal dose
SDS	Safety Data Sheet
CAS	CAS (Chemical Abstracts Service) number
EG-nr	EINECS- en ELINCS-number
EINECS	European Inventory of Existing Commercial Substances
GHS	GHS: Globally Harmonized System of Classification and Labelling of Chemicals

Data sources : ECHA (European Chemicals Agency). according to Regulation (EC) No. 1907/2006 (REACH) with its amendment Regulation (EU) 2020/878.

Other information : REACH Disclaimer:
This information is based on current knowledge. Consistency of data in the SDS with CSR is considered, as far as the information is available at the time of compilation (cfr Revision date and Version number). **DISCLAIMER OF LIABILITY** The information in this SDS was obtained from sources which we believe are reliable. However, the information is provided without any warranty, express or implied, regarding its correctness. The conditions or methods of handling, storage, use or disposal of the product are beyond our control and may be beyond our knowledge. For this and other reasons, we do not assume responsibility and expressly disclaim liability for loss, damage or expense arising out of or in any way connected with the handling, storage, use or disposal of the product. This SDS was prepared and is to be used only for this product. If the product is used as a component in another product, this SDS information may not be applicable.

Full text of H- and EUH-statements:	
Eye Irrit. 2	Serious eye damage/eye irritation, Category 2
Flam. Liq. 2	Flammable liquids, Category 2
H225	Highly flammable liquid and vapour.
H319	Causes serious eye irritation.

Classification and procedure used to derive the classification for mixtures according to Regulation (EC) 1272/2008 [CLP]:		
Flam. Liq. 2	H225	Calculation method
Eye Irrit. 2	H319	Calculation method

Safety Data Sheet applicable for regions : GB - United Kingdom
The classification complies with : ATP 12

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