



# Annex 15 report

## Proposal for identification of a substance of very high concern (SVHC) under UK REACH

Substance Name: 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol (DBMC)

EC Number: 204-327-1

CAS Number: 119-47-1

**March 2026**



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# 1. Proposal

**Substance name(s):** 6,6'-Di-tert-butyl-2,2'-methylenedi-p-cresol (DBMC)

**EC number(s):** 204-327-1

**CAS number(s):** 119-47-1

The substance is proposed to be identified as a substance meeting the criteria of Article 57 (c) of UK REACH owing to its classification in the hazard class toxic for reproduction category 1B<sup>1</sup>.

## **Summary of how the substance meets the criteria set out in Article 57 of UK REACH**

6,6'-Di-tert-butyl-2,2'-methylenedi-p-cresol (hereinafter referred to as DBMC) is included in the GB Mandatory Classification and Labelling (MCL) list. It is covered by the entry with index number 604-095-00-5 and classified in the hazard class toxic for reproduction category 1B (H360F; May damage fertility).

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<sup>1</sup> Classification in accordance with section 3.7 of Annex I to the retained Regulation (EC) No 1272/2008 as amended for Great Britain (hereinafter referred to as GB CLP).

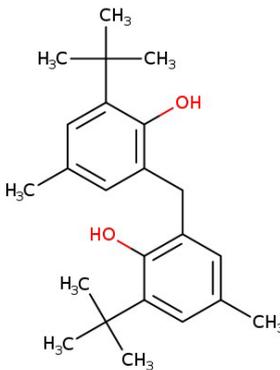
## 2. Justification

### 2.1 Identity of the substance and physical and chemical properties

#### 2.1.1 Name and other identifiers of the substance

**Table 1: Substance identity**

EC number:	204-327-1
EC name:	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol
CAS number:	119-47-1
IUPAC name:	2,2'-methylenebis(4-methyl-6-tert-butylphenol) 2,2'-methylenebis(6-tert-butyl-4-methylphenol) 2,2'-methylenebis[6-tert-butyl-p-cresol] 2-tert-butyl-6-[(3-tert-butyl-2-hydroxy-5-methylphenyl)methyl]-4-methylphenol 6,6'-di-tert-butyl-2,2'-methylenedi-p-creso
Index number in GB MCL List	604-095-00-5
Molecular formula:	C <sub>23</sub> H <sub>32</sub> O <sub>2</sub>
Molecular weight range:	340.50 g/mol
Synonyms:	DBMC 2,2-methylen-bis-(4-methyl-6-tert.butylphenol) bis(2-hydroxy-3-tert-butyl-5-methylphenyl)methane bis(6-hydroxy-3-methyl-5-tert-butylphenyl)methane

	p-cresol, 2,2'-methylenebis(6-tert-butyl-) 2,2'-Methylene-bis(4-methyl-6-tertiary butyl phenol)
Structural formula:	
Substance type:	Mono-constituent

Data source: EU Annex 15 report [ECHA \(2021\)](#)

### 2.1.2 Composition of the substance

Impurities and/or additives are not relevant for SVHC identification of the substance.

### 2.1.3 Identity and composition of degradation products/metabolites relevant for the SVHC assessment

Not relevant for the identification of the substance as a SVHC in accordance with Article 57 (c) of UK REACH.

### 2.1.4 Identity and composition of structurally related substances (used in grouping or read-across approach)

Not relevant for the identification of the substance as a SVHC in accordance with Article 57 (c) of UK REACH.

### 2.1.5 Physicochemical properties

Not relevant for the identification of the substance as a SVHC in accordance with Article 57 (c) of UK REACH.

## 2.2 Mandatory classification and labelling

**Table 2: Mandatory classification in the GB MCL list**

Index No	International Chemical Identification	EC No	CAS No	GB MCL list Classification		Aligned with EU CLH <sup>a</sup>
				Hazard Class and Category Code(s)	Hazard statement code(s)	Y/N
604-095-00-5	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol	204-327-1	119-47-1	Repr. 1B	H360F	Y

<sup>a</sup> EU CLH is harmonised classification and labelling in accordance with Regulation (EC) 1272/2008

## 2.3 Human health hazard assessment

Please see Section 2.2 (Mandatory classification and labelling).

## 2.4 Conclusions on the SVHC properties

### 2.4.1 CMR assessment

DBMC is covered by the entry with index number 604-095-00-5 in the GB MCL list and is classified in the hazard class toxic for reproduction category 1B (H360F; May damage fertility).

Therefore, the substance satisfies the criterion in Article 57(c) of UK REACH.

## 3. Information on use, exposure and alternatives

### 3.1 UK and EU REACH registration status and tonnage

The substance is registered at a tonnage of 100 - 1,000 tonnes per annum (tpa) under UK REACH. Further, a total of 67 Downstream User Import Notifications (DUINs<sup>2</sup>) have been submitted.

Under EU REACH, the substance is registered with an aggregated tonnage of 1,000 - < 10,000 tpa<sup>3</sup>. However, the Agency notes that part of this is reported to be exported outside of the EU (and GB).

### 3.2 General description of uses and exposure

DBMC is reported to be an antioxidant and a stabilising additive that is used in industrial and professional applications that include manufacture of rubber and non-rubber polymers, formulation and/or use of fuels, hydraulic and metal working fluids, adhesives, lubricants, sealants and inks. Consumer applications are reported in some of the EU REACH registration dossiers, but the EU lead registrant advises against this use.

### 3.3 Alternatives

No relevant information.

### 3.4 Additional information

No relevant information.

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<sup>2</sup> GB-based companies who imported substances from EU-based suppliers before UK REACH became law on 1 January 2021 had no EU REACH registration obligations as they were classed as Downstream Users (DUs). As they are now importers from outside of GB, they may have registration obligations under UK REACH. However, a transitional measure allows former DUs to suspend the registration until one of three deadlines (depending on tonnage and hazard). Where the identity of these imported substances was known, they could be included in a Downstream User Import Notification (DUIN) submitted to the Agency.

<sup>3</sup> ECHA Chemicals database; ECHA CHEM <https://chem.echa.europa.eu/>

## References

ECHA (2019) Committee for Risk Assessment (RAC) Opinion proposing harmonised classification and labelling at EU level of 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol; [DBMC]; CLH-O-0000001412-86-288/F; Date: 13/06/2019. Available at: <https://echa.europa.eu/documents/10162/f5a13a30-d11a-65b9-6730-592692c151f2> [Accessed: 09/2025]

ECHA (2022) Annex XV report PROPOSAL FOR IDENTIFICATION OF A SUBSTANCE OF VERY HIGH CONCERN ON THE BASIS OF THE CRITERIA SET OUT IN REACH ARTICLE 57. Available at: <https://echa.europa.eu/documents/10162/c4b47128-ee06-80a2-a89d-1be544f44c0b> [Accessed: 09/2025]

ECHA Chemicals database; ECHA CHEM. Available at: <https://chem.echa.europa.eu/> [Accessed: 09/2025]

HSE (2021) Agency technical report on the classification and labelling of 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol; [DBMC]. Available at: <https://www.hse.gov.uk/chemical-classification/assets/docs/mcl-aabf-0106.pdf> [Accessed: 09/2025]

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (Text with EEA relevance). Available at: <https://www.legislation.gov.uk/eur/2008/1272/contents> [Accessed 09/2025]

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (Text with EEA relevance). Available at: <https://www.legislation.gov.uk/eur/2006/1907/contents> [Accessed 09/2025]

# Glossary of terms used in Agency Annex 15 report

## Agency, the HSE

<b>CLH</b>	Harmonised Classification and Labelling
<b>CLP</b>	Classification, labelling and packaging
<b>DBMC</b>	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol
<b>DUIN</b>	Downstream User Import Notifications
<b>ECHA</b>	European Chemicals Agency
<b>EU</b>	European Union
<b>HSE</b>	Health and Safety Executive
<b>MCL</b>	Mandatory Classification and Labelling
<b>RAC</b>	Committee for Risk Assessment
<b>REACH</b>	Registration, Evaluation, Authorisation and Restriction of Chemicals regulation
<b>SVHC</b>	Substance of very high concern





## Further information

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