

Annex 15 report

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

Substance Name(s): tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-{[4-chloro-6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate1; Reactive Brown 51

EC Number(s): 466-490-7

CAS Number(s): -

March 2026

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1. Proposal

Substance name: tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-{[4-chloro6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate²; Reactive Brown 51

EC number(s): 466-490-7

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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 1B¹.

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

In August 2025, the GB CLP Agency published an opinion in accordance with Article 37 of GB CLP which agreed that Reactive Brown 51 should be classified in the hazard class toxic for reproduction, Category 1B (H360F; May damage fertility). Formal inclusion of the substance in the GB MCL list is anticipated in late 2026/early 2027. Classification as toxic for reproduction, Category 1B (H360F; May damage fertility) meets the criterion set out in Article 57(c) of UK REACH.

¹ 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).

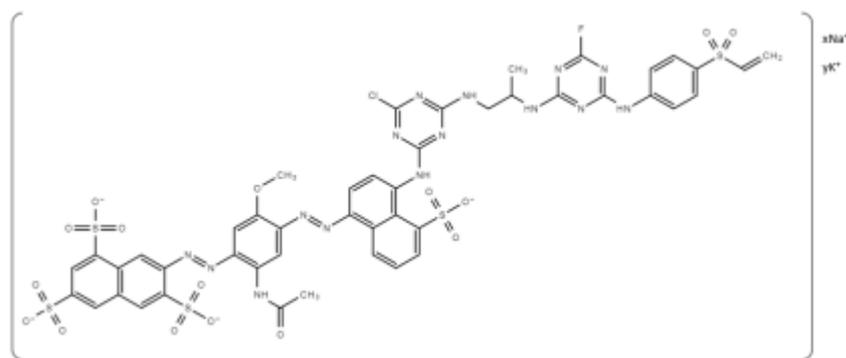
2. Justification

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:	466-490-7
EC name:	tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[4-chloro6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl}amino)-1,3,5-triazine-2-yl]amino)-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate5
CAS number (in the EC inventory):	-
IUPAC name:	tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[4-chloro6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl}amino)-1,3,5-triazine-2-yl]amino)-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate5
Index number in GB MCL List:	TBD
Molecular formula:	$C_{46}H_{35}ClFN_{15}O_{16}S_5 \cdot K_xNa_y$
Molecular weight range:	1272.7 g/mol (free acid form)

Synonyms:	Reactive Brown 51
Structural formula:	

Data source: EU Annex 15 report [ECHA \(2025\)](#)

2.1.2 Composition of the substance

Description: The substance is marketed at <80% w/w 'reactive brown' with other constituents each <10% w/w. Based on [ECHA \(2025\)](#), the composition may be regarded as a UVCB 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

In 2023, the European Chemicals Agency's risk assessment committee (RAC) adopted its opinion on the harmonised classification and labelling of Reactive Brown 51 ([ECHA 2023](#)). The substance is expected to be included in Annex VI, Part 3, Table 3 of Regulation (EC) No 1272/2008 in 2026 (Index No.: TBD). The proposed harmonised classification includes Reproductive Toxicity Category 1B (H360F: May damage fertility) and Skin Sensitisation Category 1A (H317: May cause an allergic skin reaction).

The GB CLP Agency published an opinion ([HSE, 2025](#)) in accordance with Article 37 of GB CLP in August 2025 which agreed with this classification. It is anticipated that the classification will be published in the GB MCL list in 2026/2027.

Further information regarding the basis for the classification is provided in the GB CLP Agency technical report ([HSE, 2024](#)).

2.3 Human health hazard assessment

Please see Section 2.2 (mandatory classification and labelling) and the GB CLP Agency technical report ([HSE, 2024](#))

2.4 Conclusions on the SVHC properties

2.4.1 CMR assessment

Reactive Brown 51 is proposed for inclusion in the GB Mandatory Classification and Labelling (MCL) list (Index No.: TBD). An opinion adopted under Article 37 of GB CLP concludes that the substance should be classified as toxic for reproduction, Category 1B (H360F; May damage fertility).

On this basis, the substance is considered to meet 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 not registered under UK REACH and no Downstream User Import Notifications (DUINs²) have been submitted.

Under EU REACH, there are no longer any active registrations for the substance. It was previously registered in the tonnage range of 1-10 tonnes per annum (tpa)³.

3.2 General description of uses and exposure

Reactive Brown 51 is a colorant that is (or was) used in textile dyes. Industrial, professional and consumer use (home dyeing) is possible and the substance may be present in products made from fabrics, textiles, and apparel (e.g. clothing, mattresses, curtains, carpets, or textile-based toys).

3.3 Alternatives

No information is available on alternatives to Reactive Brown 51.

3.4 Additional information

No additional relevant information is available.

² 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.

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

References

ECHA (2023) Committee for Risk Assessment (RAC) Opinion proposing harmonised classification and labelling at EU level of tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[[4-chloro-6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl]amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate; [substance having a complex composition with <80% of the above constituents and other reaction side products]; Reactive Brown 51; CLH-O-0000007375-70-01/F; Date: 30/11/2023. Available at: <https://echa.europa.eu/documents/10162/dea058d2-6fd5-42c1-cd6a-e1672a5d5de4> [Accessed: 10/2025]

ECHA (2025) Annex XV report: Proposal for identification of tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[[4-chloro-6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl]amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate; Reactive Brown 51 as a substance of very high concern (SVHC) on the basis of the criteria set out in REACH Article 57; Submitted by: Sweden; Date: February 2025. Available at: <https://echa.europa.eu/documents/10162/32d0f377-0e96-829c-fff0-6a153ae70cf1> [Accessed: 10/2025]

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

HSE (2024) GB CLP – Article 37 Technical Report – tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[[4-chloro-6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl]amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate; [substance having a complex composition with <80% of the above constituents and other reaction side products]; Reactive Brown 51; MCL-AAPY-0679; Date: August 2024. Available at: <https://www.hse.gov.uk/chemical-classification/assets/docs/mcl-aapy-0679.pdf> [Accessed: 10/2025]

HSE (2025) GB CLP – Article 37 Agency Opinion – tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[[4-chloro-6-({2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino]propyl]amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate; [substance having a complex composition with <80% of the above constituents and other reaction side products]; Reactive Brown 51; CWBSD-ABBH-0976; Date: August 2025. Available at:

<https://www.hse.gov.uk/chemical-classification/assets/docs/cwbsd-abbh-0976.pdf>

[Accessed: 10/2025]

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 10/2025]

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 10/2025]

Glossary of terms used in Agency Annex 15 report

Agency, the HSE

CLH	Harmonised Classification and Labelling
CLP	Classification, labelling and packaging
DUIN	Downstream User Import Notifications
ECHA	European Chemicals Agency
EU	European Union
HSE	Health and Safety Executive
MCL	Mandatory Classification and Labelling
RAC	Committee for Risk Assessment
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals regulation
SVHC	Substance of very high concern



Further information

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