

ABC Evaluation Denmark

Cargo 2800

The below ABC-evaluation is made according to the Danish Environmental Protection Agency's **Guidance No. 77 (2025): Connection of Industrial Wastewater to Wastewater Utility Treatment Plants**, Danish Environmental Protection Agency – Chapter 3.7 (ABC evaluation of organic substances)

This evaluation is based on the information in MSDS: **Cargo 2800**, last revised the 26.01.2022, version 4.01 and preliminary calculation for the product as a 2% application solution, in accordance with the dosage specified on the **Cargo 2800** label.

ABC Criteria (Guidance 2025)

According to Guidance No 77 (2025) section 3.7.2, the ABC classification is based exclusively on CLP hazard statements (H-statements):

A substance: Substances with severe and irreversible human health effects (e.g. H340, H350, H360) or very high environmental toxicity (H400, H410).

B substances: Substances with chronic environmental toxicity (H411, **H412**, H413).

C substances: All other substances not classified as A or B

Relevant Constituents (SDS, Section 3.2):

Substance	CAS No.	Content [%]	Relevant CLP classifications Human health hazard statement codes	ABC classification
1-Propanaminium, 3-amino-N-(carboxymethyl)-N,Ndimethyl-, N-coco acyl derivs., hydroxides, inner salts	61789-40-0	1-5	H315, H317, H319, H412	B
Sodium Hydroxide	1310-73-2	<= 2	H290, H314, H318	C

ABC Evaluation of Individual Substances

1-Propanaminium, 3-amino-N-(carboxymethyl)-N,Ndimethyl-,N-coco acyl derivs., hydroxides, inner salts is classified as Aquatic Chronic 3 (H412) . H412 is explicid listed as a criterion for B substances in Guidance 2025 and needs to be assigned to the ABC category B.

Sodium Hydroxide is classified as Skin Cor. 1A (H314) and Eye Dam. 1 (H318). No H-statement is triggering A or B classification under the ABC system. It is an inorganic substance that is neither persistent nor bioaccumulative. Sodium Hydroxide matches the criteria for ABC category C.

Although Sodium Hydroxide is classified as a C substance in the ABC categories, it is highly relevant for wastewater regulation due to its strong alkalinity and corrosive properties. According to Guidance 2025, physical-chemical parameters such as pH and corrosivity must be regulated through permit conditions and BAT (Best Available Techniques)

Relevant Constituents at use solution 2 % and pH 12,13

Based on the CLP pre calculation of the product as use solution there are no hazardous ingredients which need to be considered for the ABC evaluation.

Conclusion

Cargo 2800 is not to be classified under ABC criteria Guidance No. 77 (2025).

Discharge to sewer is in principle permissible, if conditions are imposed requiring BAT, pH control, and limitation of surfactant emissions to protect the sewer system, the wastewater treatment plant, and the receiving water body.

References

<https://mst.dk/publikationer/2025/september/tilslutning-af-industrispildevand-til-spildevandsforsyningsselskabernes-spildevandsanlaeg>

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