Helsinki, 21 January 2021

Addressees
Registrant(s) of JS_202-284-3 as listed in the last Appendix of this decision

Date of submission of the dossier subject to this decision
11/11/2015

Registered substance subject to this decision ("the Substance")
Substance name: Ethyl benzoate
EC number: 202-284-3
CAS number: 93-89-0

Decision number: Please refer to the REACH-IT message which delivered this communication (in format CCH-D-XXXXXXXXXX-XX-XX/F)

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below, by the deadline of ***28 July 2022***.

Requested information must be generated using the Substance unless otherwise specified.

A. Information required from all the Registrants subject to Annex VIII of REACH

1. In vitro cytogenicity study in mammalian cells (Annex VIII, Section 8.4.2.; test method: OECD TG 473) or In vitro micronucleus study (Annex VIII, Section 8.4.2.; test method: OECD TG 487)

2. If negative results are obtained in test performed for the information requirement of Annex VIII, Section 8.4.2. then: In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method: OECD TG 476 or TG 490)

3. Short-term repeated dose toxicity (28 days; Annex VIII, Section 8.6.1.) to be combined with the Screening for reproductive/developmental toxicity below (request A.4)

4. Combined repeated dose toxicity study with the Reproduction/developmental toxicity screening test (Annex VIII, Section 8.7.1.; test method: EU B.64/OECD TG 422) by oral route, in rats

Reasons for the request(s) are explained in the following appendices:

- Appendix entitled "Reasons common to several requests";
- Appendix entitled "Reasons to request information required under Annex VIII of REACH".

Information required depends on your tonnage band

You must provide the information listed above for all REACH Annexes applicable to you, and in accordance with Articles 10(a) and 12(1) of REACH:

- the information specified in Annexes VII and VIII to REACH, for registration at 10-100 tpa.

You are only required to share the costs of information that you must submit to fulfil your information requirements.

How to comply with your information requirements

To comply with your information requirements you must submit the information requested by this decision in an updated registration dossier by the deadline indicated above. You must also update the chemical safety report, where relevant, including any changes to classification and labelling, based on the newly generated information.

You must follow the general testing and reporting requirements provided under the Appendix entitled "Requirements to fulfil when conducting and reporting new tests for REACH purposes". For references used in this decision, please consult the Appendix entitled "List of references".

Appeal

This decision, when adopted under Article 51 of REACH, may be appealed to the Board of Appeal of ECHA within three months of its notification to you. Please refer to http://echa.europa.eu/regulations/appeals for further information.

Failure to comply

If you do not comply with the information required by this decision by the deadline indicated above, ECHA will notify the enforcement authorities of your Member State.

Authorised[1] under the authority of Christel Schilliger-Musset, Director of Hazard Assessment

[1] As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Appendix on Reasons common to several requests

1. Assessment of your read-across approach under Annex XI, Section 1.5.

You seek to adapt the following standard information requirements by applying a read-across approach in accordance with Annex XI, Section 1.5:

- In vitro cytogenicity study in mammalian cells (Annex VIII, Section 8.4.2) or In vitro micronucleus study (Annex VIII, Section 8.4.2.)
- In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.)
- Short-term repeated dose toxicity (28 days) (Annex VIII, Section 8.6.1.)
- Screening for reproductive/developmental toxicity (Annex VIII, Section 8.7.1)

ECHA has considered the scientific and regulatory validity of your read-across approach(es) in general before assessing the specific standard information requirements in the following appendices.

Annex XI, Section 1.5 requires that whenever read-across is used adequate and reliable documentation of the applied method must be provided. Such documentation must provide a justification for the read-across including a hypothesis, explanation of the rationale for the prediction of properties and robust study summaries of the source studies.[2]

Additional information on what is necessary when justifying a read-across approach can be found in the ECHA Guidance[3] and related documents[4, 5].

A. Predictions for properties

a. Prediction for toxicological properties

You have provided the following reasoning for the prediction of toxicological properties (in the IUCLID section 13.2):

"*...target and source substances have similar toxicological properties because they share common physical-chemical characteristics. Thus, this prediction is supported by available physicochemical and toxicological data on the substances themselves.*

The target substance ethyl benzoate (CAS 93-89-0) is the carbonic acid ester of benzoic acid and ethanol. The source substance methyl benzoate (CAS 93-58-3) is also an aromatic chemical compound and has almost the same structure as compared to ethyl benzoate except for the methyl ester instead of the ethyl ester (see tables 1 and 2). The second source substance is benzoic acid (CAS 65-85-0), which is the free acid of the target substance (and also of methyl benzoate). [...]

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[2] Guidance on information requirements and chemical safety assessment Chapter R.6: QSARs and grouping of Chemicals, Section R.6.2.6.1

[3] Guidance on information requirements and chemical safety assessment Chapter R.6: QSARs and grouping of Chemicals. 2008 (May) ECHA, Helsinki. 134. pp. Available online: https://echa.europa.eu/documents/10162/13632/information_requirements_r6_en.pdf/77f49f81-b76d-40ab-8513-4f3a533b6ac9

[4] Read-Across Assessment Framework (RAAF). 2017 (March) ECHA, Helsinki. 60 pp. Available online: Read-Across Assessment Framework (https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across)

[5] Read-across assessment framework (RAAF) - considerations on multi-constituent substances and UVCBs. 2017 (March) ECHA, Helsinki. 40 pp. Available online: https://doi.org/10.2823/794394

These side chains have no structural alerts for toxicity and are closely related to substances of known low toxicity. [...]

Data for benzoic acid reveal a greater difference compared to these two substances with regard to the following parameters: aggregate state, melting/freezing point and vapour pressure. Read across is therefore not justified due to similar properties but due to the fact that the source substance benzoic acid is the free acid of the target substance and can be regarded as a breakdown product of ethyl benzoate. [...]

Generally, benzoate esters are rapidly absorbed in the gastrointestinal tract and hydrolysed by carboxylesterases into benzoic acid and aliphatic alcohols. Thus the common breakdown product of all benzoate esters is benzoic acid."

You specify further that the source substance methyl benzoate (EC 202-259-7) is considered for *in vitro* cytogenicity study in mammalian cells and *in vitro* gene mutation study in mammalian cells, while the source substance benzoic acid (EC 200-618-2) is considered for the short-term repeated dose toxicity study (28 days) and screening for reproductive/developmental toxicity study.

ECHA understands that you predict the properties of the Substance using a read-across hypothesis which

a. is based on the formation of common (bio)transformation products when benzoic acid is the source substance, and
b. assumes that different compounds have the same type of effects when methyl benzoate is used as a source substance.

The properties of your Substance are predicted to be quantitatively equal to those of the source substances.

ECHA notes the following shortcomings with regards to prediction of toxicological properties.

a. Hypothesis based on the formation of common (bio)transformation products

Missing information on the formation of common compound

As indicated above, your read-across hypothesis is based on the transformation of the target substance to benzoic acid. In this context, information characterising the rate and extent of the break-down of the target substance to benzoic acid is necessary to confirm the formation of the proposed common break-down product and to assess the impact of the exposure to the parent compounds.

You have not provided any experimental data to document the presumed rapid transformation of the target substance into benzoic acid and aliphatic alcohol (ethanol).

In your comments to the draft decision, you provide the following information: *"Hydrolysis rates were measured in 80% human plasma and showed similar rates between ethyl benzoate (target) and methyl benzoate (source substance 1). The rates were 3.3 x 10^{-2}/min and 6.4 x 10^{-3}/min respectively. The half-lives ($t_{1/2}$) were 210 and 108 minutes."*

ECHA concludes that the information provided does not demonstrate rapid hydrolysis of your Substance. On the contrary the $t_{1/2}$ of 210 minutes shows that significant exposure to the parent compound occurs.

Therefore, your hypothesis based on formation of common (bio)transformation products and

predicting the toxicity of the Substance based on information on the common products only is rejected.

b. Hypothesis assuming different substances have the same type of effects

Annex XI, Section 1.5 of the REACH Regulation states that "*physicochemical properties, human health effects and environmental effects or environmental fate may be predicted from data for reference substance(s)*". For this purpose "*it is important to provide supporting information to strengthen the rationale for the read-across*"[6]. The set of supporting information should allow to verify the crucial aspects of the read-across hypothesis and establish that the properties of the Substance can be predicted from the data on other category members.

Supporting information must include bridging studies to compare properties of the category members and to support your prediction, which is based on similarity of the relevant toxic properties.

As indicated above, your read-across hypothesis is based on the assumption that the structurally similar target and source substances cause the same type of effect(s). In this context, relevant, reliable and adequate information allowing to compare the properties of the target and source substance is necessary to confirm that both substances cause the same type of effects. Such information can be obtained, for example, from bridging studies of comparable design for the target and the source substances.

The data set reported in the technical dossier does not include relevant, reliable and adequate information for the target substance to support your read-across hypothesis. More notably, you have not provided any information with the target substance, which could be considered as bridging studies to demonstrate toxicological similarity between the source and and the target substances.

For the reasons further explained below, an OECD toolbox profiler prediction/alert table provided as part of your read-across justification document cannot be considered as bridging data demonstrating similarity of the target and source substances.

Comments related to repeated dose toxicity
In your comments to the draft decision, you state that information from studies with group members were provided for several toxicological endpoints, but not for repeated dose toxicity. You conclude that if ECHA considers data on repeated dose toxicity as mandatory bridging study, it would mean that for substances of Annex VIII the OECD 422 or 421 and OECD 407 become mandatory tests, and that you cannot find such an assessment or requirement in either ECHA's guidance nor in REACH.

Read-across is a case-by-case process, dependent on the read-across hypothesis made. For cases where the read-across hypothesis for repeated dose toxicity is based on the assumption that the structurally similar target and source substances cause the same type of effect(s) bridging information is likely to bring confidence that the source and target substances in fact share the same toxic properties. For categories the possibility to demonstrate that properties can be predicted from data on other category members depends on several parameters, such as the structural characteristics and data density of the family menbers in a category.

Different considerations would apply for read-across hypothesis solely based on the formation

[6] Guidance on information requirements and chemical safety assessment Chapter R.6: QSARs and grouping of Chemicals, Section R.6.2.2.1.f

of common (bio)transformation products. Therefore, ECHA disagrees with your statement that for substances of Annex VIII the OECD 422 or 421 and OECD 407 are mandatory tests.

Comments related to mutagenicity
In your comments to the draft decision you disagree with ECHA's rejection of read-across for mutagenicity. You claim that QSAR shows that the sources (methyl benzoate and benzoic acid) and the target do not differ in their mechanism of action in relation to mutagenicity, that the substances are of high purity, and that there is bridging information available as there are Ames' tests on all three substances and in vitro micronucleus tests for the two sources.

As regards your QSAR information ECHA agrees that such information can be used to more generally support read-across. However, your predictions do not meet the conditions needed to adapt the standard information requirement as set out in Annex XI, Section 1.3., as further discussed below, and they are thus not reliable. Your argument related to purity of the substances is also of no relevance.

As regards bridging studies for genotoxicity you only have an Ames' test with your Substance. This study cannot be used as a bridging study for cytogenicity, which is a (mechanistically) different genotoxic endpoint and therefore, requires a different specific test to be performed. It is furthermore not an acceptable bridging study for testing mutagenicity in mammalian cells due to the significant differences between the tests. ECHA concludes that the data density in your dossier for genotoxicity is not sufficient to justify read-across.

In the absence of such information, you have not established that the target and the source substances are likely to have similar properties. Therefore, you have not provided sufficient supporting information to strengthen the rationale for the read-across.

Adequacy and reliability of source studies and QSAR information

According to Annex XI, Section 1.5., if the grouping concept is applied then in all cases the results to be read across should:
- have adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3);
- cover an exposure duration comparable to or longer than the corresponding test method referred to in Article 13(3) if exposure duration is a relevant parameter.

The studies that you provided for the endpoints sub-acute toxicity and reproductive toxicity do not provide an adequate coverage of some key parameters expected to be investigated, and therefore do not meet the requirement for adequacy and reliability under Section 1.5, Annex XI to REACH for the reasons provided under Appendix A, sections 3 and 4.

QSAR prediction can be used to adapt the standard information requirement, if the rules set in Annex XI, Section 1.3. Qualitative or quantitative structure-activity relationship (QSAR) are met. The following cumulative conditions need to be met:

1. results are derived from a QSAR model whose scientific validity has been established;
2. the substance falls within the applicability domain of the QSAR model;
3. adequate and reliable documentation of the applied method is provided; and
4. the results are adequate for classification and labelling and/or risk assessment.

You have provided an OECD QSAR Toolbox profiler comparison of the target and source substances as part of your read-across supporting documentation. Comparison includes

various toxicological alerts and predictions related to e.g. genotoxicity, carcinogenicity, reproductive and developmental toxicity, DNA binding and metabolism. You conclude that "*comparison of the QSAR Toolbox profiling schemes for the target substance and the source substances clearly shows that the substances are very similar regarding their toxicological profile and therefore a read-across is justified.*" You did not provide information that would fulfil the rules 1-4 above.

The OECD QSAR Toolbox profiler information cannot be considered as a QSAR model addressing a toxicological endpoint(s), and the information does not fulfil the criteria in Annex XI, Section 1.3. The information cannot therefore be used as a demonstration of similar properties under read-across adaptation according to Annex XI, Section 1.5.

B. Conclusions on the read-across approach

As explained above, your adaptation does not comply with the general rules of adaptation as set out in Annex XI, Section 1.5. Therefore, your adaptation is rejected and it is necessary to perform testing on your Substance.

Appendix A: Reasons to request information required under Annex VIII of REACH

1. In vitro cytogenicity study in mammalian cells or In vitro micronucleus study

An *in vitro* cytogenicity study in mammalian cells or an *in vitro* micronucleus study is a standard information requirement in Annex VIII to REACH.

You provided an adaptation according to the general rules for adaptation of Annex XI, Section 1.5.

In support of your adaptation, you have provided the following sources of information:

- an *In Vitro* Mammalian Cell Micronucleus Test (OECD TG 487) with analogue substance methyl benzoate (EC 202-259-7)

As explained in the Appendix Reasons common to several requests, your adaptation under Annex XI, Section 1.5 is rejected.

Based on the above, the information you provided do not fulfil the information requirement.

Information on the study design

To fulfil the information requirement for the Substance, both *in vitro* cytogenicity study in mammalian cells (Annex VIII, Section 8.4.2., test method OECD TG 473) and *in vitro* micronucleus study (Annex VIII, Section 8.4.2., test method OECD TG 487) are considered suitable.

2. In vitro gene mutation study in mammalian cells

An *in vitro* gene mutation study in mammalian cells is a standard information requirement in Annex VIII to REACH in case of a negative result in the *in vitro* gene mutation test in bacteria and the *in vitro* cytogenicity test.

Your dossier contains (i) a negative result for *in vitro* gene mutation study in bacteria, and (ii) inadequate data for the other study (*in vitro* cytogenicity study in mammalian cells or *in vitro* micronucleus study).

The *in vitro* cytogenicity studies in mammalian cells or *in vitro* micronucleus study provided in the dossier are rejected for the reasons provided in section A1.

For Annex VIII, 8.4.3., you have not provided any study in your dossier. However, you provided an adaptation according to the general rules for adaptation of Annex XI, Section 1.5.

We have assessed this information and identified the following issue(s):

In support of your adaptation, you have provided the following sources of information:

i. an *In Vitro* Mammalian Cell Gene Mutation Test (OECD TG 476) with analogue substance methyl benzoate (EC 202-259-7)

As explained in the Appendix on Reasons common to several requests, your adaptation under Annex XI, Section 1.5 is rejected.

Based on the above, the information you provided do not fulfil the information requirement.

The result of the request for information in section 1 of Appendix A will determine whether the present requirement for an *in vitro* mammalian cell gene mutation study in accordance with Annex VIII, Section 8.4.3 is triggered.

Consequently, you are required to provide information for this endpoint, if the *in vitro* cytogenicity study in mammalian cells or an *in vitro* micronucleus study provide a negative result.

Information on the study design

To fulfil the information requirement for the Substance, both the *in vitro* mammalian cell gene mutation tests using the hprt and xprt genes (OECD TG 476) and the thymidine kinase gene (OECD TG 490) are considered suitable.

3. Short-term repeated dose toxicity (28 days)

A Short-term repeated dose toxicity study (28 days) is a standard information requirement in Annex VIII to REACH.

You have provided an adaptation according to Annex XI, Section 1.5. in your dossier.

We have assessed this information and identified the following issue(s):

You have provided the following study supporting your adaptation:

- Multi-generation reproductive toxicity study in rat, with analogue substance benzoic acid (EC 200-618-2). No guideline (1960).

As specified under Appendix on Reasons common to several requests, your read-across adaptation is rejected. In addition we have identified the following deficiencies:

Your study needs to have adequate and reliable coverage of the key parameters foreseen to be investigated in the corresponding test methods referred to in Article 13(3), in this case OECD TG 407. The key parameter(s) of this test guideline include

- testing of at least three dose levels and a concurrent control (scenario 1)
- highest dose level should aim to induce some systemic toxicity, but not death or severe suffering (scenario 2)
- examination of the animals for weight and histopathology (including thyroid gland/ thyroid hormone measurements), ophthalmological examination, haematology, clinical biochemistry, urinalysis

The provided study was conducted

- using less than three dose levels
- without inducing systemic toxicity in any dose groups
- without covering the following key parameters: clinical observations, ophthalmological examination, haematology, clinical biochemistry, urinalysis.

Based on the above, the information you provided do not fulfil the information requirement.

Study design

Further information on the study design is provided under Section A.4. below.

4. Screening for reproductive/developmental toxicity

A Screening for reproductive/developmental toxicity study (test method: EU B.63/OECD TG 421 or EU B.64/OECD TG 422) is a standard information requirement under Annex VIII to REACH, if there is no evidence from analogue substances, QSAR or *in vitro* methods that the Substance may be a developmental toxicant. There is no information available in your dossier indicating that your Substance may be a developmental toxicant.

You have adapted this information requirement according to Annex XI 1.5 (read-across) of REACH.

We have assessed this information and identified the following issue(s):

In support of your adaptation, you have provided the following sources of information:

- Multi-generation reproductive toxicity in rat, with the analogue substance benzoic acid (EC 200-618-2). No guideline (1960).

As explained in the Appendix Reasons common to several requests, your adaptation under Annex XI, Section 1.5 is rejected. In particular, the following endpoint-specific deficiency has been identified:

A. STUDY QUALITY

As specified under Appendix on Reasons common to several requests, to be considered compliant and to generate information concerning the effects of the Substance on male and female reproductive performance as well as specific target organ toxicity, your study needs to have adequate and reliable coverage of the key parameters foreseen to be investigated in the corresponding test methods referred to in Article 13(3), in this case EU B.63/OECD TG 421 or EU B.64/OECD TG 422. The key parameters of these test guidelines include at least three dose levels, mating and fertility/duration of gestation or information on parturition, investigations for thyroid hormone assessment (P0 and F1), investigations for stillbirths and live births, gross abnormalities, anogenital distance, number of nipples, and areolae in male pups, monitoring of oestrus cycles.

The study you have provided deviated from the OECD TG 421 or 422 in the following ways:

- it was conducted with two dose levels instead of three;
- it did not include investigations for thyroid hormone assessment (P0 and F1);
- it did not report the duration of gestation or give information on parturition;
- oestrus cycles were not monitored;
- investigations for stillbirths and live births, gross abnormalities, anogenital distance, number of nipples, and areolae in male pups were not reported.

Therefore, this study cannot be used to predict the properties of the Substance for Screening for reproductive/developmental toxicity. In the absence of adequate and reliable information on the key parameters your adaptation must be rejected.

In your comments to the draft decision, you state that the multi-generation (4-generation) study submitted for this endpoint has been accepted in other registration dossiers. ECHA notes that the current compliance check can only consider the information submitted for the registration for the Substance.

Furthermore, you argue that the long duration and more generations studied in the multi-generation study could in part compensate for the deficiencies noted by ECHA. You agree,

however, to strengthen the data set for benzoic acid, and also for the second metabolite, ethanol, if needed. ECHA notes that there is at present no adaptation according to Annex XI Section 1.2. (Weight of Evidence) in your dossier to justify how the studies presently included in your dossier may fulfil this information requirement.

You further raise the issue, whether data on the metabolite ethanol would be needed. ECHA notes that if you wish to base your read-across hypothesis for this endpoint on the formation of common (bio)transformation products, sufficient hazard data on the (bio)transformation products to fulfil the information requirements for the endpoint in question is required.

Based on the above, the information you provided does not fulfil the information requirement.

Study design

In a proposal for amendment (PfA), submitted by one of the Member States competent authorities, it was indicated that when there is no information available neither for the 28-day repeated dose toxicity endpoint (EU B.7, OECD TG 407) (as explained above under section A.3.), nor for the screening study for reproductive/ developmental toxicity (OECD TG 421 or TG 422), the conduct of a combined repeated dose toxicity study with the reproduction/developmental toxicity screening test (OECD TG 422) is preferred to ensure that unnecessary animal testing is avoided. Such an approach offers the possibility to avoid carrying out a 28-day study according to OECD TG 407, because the OECD TG 422 can at the same time fulfil the information requirement of REACH Annex VIII, 8.6.1 and that of REACH Annex VIII, 8.7.1.[7] ECHA agrees with this approach.

In your comments to the PfA you indicate that you would like to have the right to decide on performing either study or both in the context of considering read-across and weight of evidence approaches to other chemically very similar substances.

It is at your discretion to generate and provide the necessary supporting information in order to justify your read-across and weight of evidence adaptation. If you do so, you are responsible for demonstrating the fulfilment of the requirements of Section 1.5 and Section 1.2 of Annex XI to REACH. If it fails and the resulting data does not support, or even contradicts, your read-across hypothesis or weight of evidence approach, you remain responsible for complying with this decision by the set deadline.

Currently, as specified under Appendix on Reasons common to several requests, your read-across adaptation is rejected.

Consequently, the information provided in your dossier and your comments to the draft decision and PfA is not sufficient to fulfil the information requirement.

Therefore, a study according to the test method EU B.64/OECD TG 422 must be performed in rats with oral[8] administration of the Substance.

[7] ECHA Guidance R.7a, Section R.7.6.2.3.2., pages 484 to 485 of version 6.0 – July 2017. (https://echa.europa.eu/documents/10162/13632/information_requirements_r7a_en.pdf)
[8] ECHA Guidance R.7a, Section R.7.6.2.3.2.

Appendix B: Requirements to fulfil when conducting and reporting new tests for REACH purposes

A. Test methods, GLP requirements and reporting

1. Under Article 13(3) of REACH, all new data generated as a result of this decision must be conducted according to the test methods laid down in a European Commission Regulation or to international test methods recognised by the Commission or ECHA as being appropriate.

2. Under Article 13(4) of REACH, ecotoxicological and toxicological tests and analyses must be carried out according to the GLP principles (Directive 2004/10/EC) or other international standards recognised by the Commission or ECHA.

3. Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries[9].

B. Test material

Before generating new data, you must agree within the joint submission on the chemical composition of the material to be tested (Test Material) which must be relevant for all the registrants of the Substance.

1. Selection of the Test material(s)

   The Test Material used to generate the new data must be selected taking into account the following:
   - the variation in compositions reported by all members of the joint submission,
   - the boundary composition(s) of the Substance,
   - the impact of each constituent/ impurity on the test results for the endpoint to be assessed. For example, if a constituent/ impurity of the Substance is known to have an impact on (eco)toxicity, the selected Test Material must contain that constituent/ impurity.

2. Information on the Test Material needed in the updated dossier
   - You must report the composition of the Test Material selected for each study, under the "Test material information" section, for each respective endpoint study record in IUCLID.
   - The reported composition must include all constituents of each Test Material and their concentration values and other parameters relevant for the property to be tested.

This information is needed to assess whether the Test Material is relevant for the Substance and whether it is suitable for use by all members of the joint submission.

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers[10].

[9] https://echa.europa.eu/practical-guides
[10] https://echa.europa.eu/manuals

Appendix C: Procedure

This decision does not prevent ECHA from initiating further compliance checks at a later stage on the registrations present.

ECHA followed the procedure detailed in Articles 50 and 51 of REACH.

The compliance check was initiated on 9 July 2019.

ECHA notified you of the draft decision and invited you to provide comments

ECHA took into account your comments and did not amend the request(s).

ECHA notified the draft decision to the competent authorities of the Member States for proposals for amendment.

ECHA received proposal(s) for amendment and modified the draft decision.

ECHA invited you to comment on the proposed amendment(s) and referred the modified draft decision to the Member State Committee.

Your comments on the proposed amendment(s) were taken into account by the Member State Committee.

In addition, you provided comments on the draft decision. These comments were not taken into account by the Member State Committee as they were considered to be outside of the scope of Article 51(5).

The timeline indicated in the draft decision to provide the information requested is 12 months from the date of adoption of the decision. In your comments to the PfA, you requested an extension of the timeline to 15 months. You justified your request by providing documentary evidence from two laboratories.

Therefore, ECHA has granted the request and set the deadline to 15 months.

The Member State Committee reached a unanimous agreement on the draft decision in its MSC-72 written procedure and ECHA took the decision according to Article 51(6) of the REACH Regulation.

Appendix D: List of references - ECHA Guidance[11] and other supporting documents

Evaluation of available information
Guidance on information requirements and chemical safety assessment, Chapter R.4 (version 1.1., December 2011), referred to as ECHA Guidance R.4 where relevant.

QSARs, read-across and grouping
Guidance on information requirements and chemical safety assessment, Chapter R.6 (version 1.0, May 2008), referred to as ECHA Guidance R.6 where relevant.

Read-across assessment framework (RAAF, March 2017)[12]

RAAF - considerations on multiconstituent substances and UVCBs (RAAF UVCB, March 2017)[12]

Physical-chemical properties
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Toxicology
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7c (version 3.0, June 2017), referred to as ECHA Guidance R.7c in this decision.

Environmental toxicology and fate
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7b (version 4.0, June 2017), referred to as ECHA Guidance R.7b in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7c (version 3.0, June 2017), referred to as ECHA Guidance R.7c in this decision.

PBT assessment
Guidance on information requirements and chemical safety assessment, Chapter R.11 (version 3.0, June 2017), referred to as ECHA Guidance R.11 in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.16 (version 3.0, February 2016), referred to as ECHA Guidance R.16 in this decision.

Data sharing
Guidance on data-sharing (version 3.1, January 2017), referred to as ECHA Guidance on data sharing in this decision.

OECD Guidance documents[13]

[11] https://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment
[12] https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across
[13] http://www.oecd.org/chemicalsafety/testing/series-testing-assessment-publications-number.htm

Guidance Document on aqueous-phase aquatic toxicity testing of difficult test chemicals – No 23, referred to as OECD GD 23.

Guidance document on transformation/dissolution of metals and metal compounds in aqueous media – No 29, referred to as OECD GD 29.

Guidance Document on Standardised Test Guidelines for Evaluating Chemicals for Endocrine Disruption – No 150, referred to as OECD GD 150.

Guidance Document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test – No 151, referred to as OECD GD 151.

Appendix E: Addressees of this decision and the corresponding information requirements applicable to them

You must provide the information requested in this decision for all REACH Annexes applicable to you.

Registrant Name	Registration number	Highest REACH Annex applicable to you
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

Where applicable, the name of a third party representative (TPR) may be displayed in the list of recipients whereas ECHA will send the decision to the actual registrant.