

Committee for Risk Assessment
RAC

Annex 1
Background document
to the Opinion proposing harmonised classification
and labelling at EU level of

1,2-dihydroxybenzene; pyrocatechol

EC Number: 204-427-5
CAS Number: 120-80-9

CLH-O-0000001412-86-122/F

The background document is a compilation of information considered relevant by the dossier submitter or by RAC for the proposed classification. It includes the proposal of the dossier submitter and the conclusion of RAC. It is based on the official CLH report submitted to public consultation. RAC has not changed the text of this CLH report but inserted text which is specifically marked as 'RAC evaluation'. Only the RAC text reflects the view of RAC.

Adopted
16 September 2016

CLH report

Proposal for Harmonised Classification and Labelling

**Based on Regulation (EC) No 1272/2008 (CLP Regulation),
Annex VI, Part 2**

Substance Name: Pyrocatechol

EC Number: 204-427-5
CAS Number: 120-80-9
Index Number: 604-016-00-4

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Part A.

1 PROPOSAL FOR HARMONISED CLASSIFICATION AND LABELLING

1.1 Substance

Table 1: Substance identity

Substance name:	<i>1,2-dihydroxybenzene; pyrocatechol</i>
EC number:	<i>204-427-5</i>
CAS number:	<i>120-80-9</i>
Annex VI Index number:	<i>604-016-00-4</i>
Degree of purity:	<i>≥ 98.5 %</i>
Impurities:	<i>Confidential – no information on the impurities is provided in the technical dossier. The substance is classified with a min purity of 98.5% and its unknown impurities.</i>

1.2 Harmonised classification and labelling proposal

Table 2: The current Annex VI entry and the proposed harmonised classification

	CLP Regulation
Current entry in Annex VI, CLP Regulation	Acute toxicity - oral: Acute Tox. 4* - H302 Acute toxicity – dermal: Acute Tox. 4* - H312 Skin corrosion / irritation: Skin Irrit. 2 - H315 Serious damage / eye irritation: Eye Irrit. 2 - H319
Current proposal for consideration by RAC	Acute toxicity - oral: Acute Tox. 3 - H301 Acute toxicity – dermal: Acute Tox. 3 - H311 Mutagen 2 - H341 Carcinogen 2 - H351
Resulting harmonised classification (future entry in Annex VI, CLP Regulation)	Acute toxicity - oral: Acute Tox. 3 - H301 Acute toxicity – dermal: Acute Tox. 3 - H311

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	Skin corrosion / irritation: Skin Irrit. 2 - H315 Serious damage / eye irritation: Eye Irrit. 2 - H319 Mutagen 2 - H341 Carcinogen 2 - H351
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1.3 Proposed harmonised classification and labelling based on CLP Regulation criteria

Table 3: Proposed classification according to the CLP Regulation

CLP Annex I ref	Hazard class	Proposed classification	Proposed SCLs and/or M-factors	Current classification ¹⁾	Reason for no classification ²⁾
2.1.	Explosives	none	/	none	Conclusive but not sufficient for classification
2.2.	Flammable gases	none	/	none	Not adequate
2.3.	Flammable aerosols	none	/	none	Not adequate
2.4.	Oxidising gases	none	/	none	Not adequate
2.5.	Gases under pressure	none	/	none	Not adequate
2.6.	Flammable liquids	none	/	none	Not adequate
2.7.	Flammable solids	none	/	none	Conclusive but not sufficient for classification
2.8.	Self-reactive substances and mixtures	none	/	none	Conclusive but not sufficient for classification
2.9.	Pyrophoric liquids	none	/	none	Not adequate
2.10.	Pyrophoric solids	none	/	none	Conclusive but not sufficient for classification
2.11.	Self-heating substances and mixtures	none	/	none	Conclusive but not sufficient for classification
2.12.	Substances and mixtures which in contact with water emit flammable gases	none	/	none	Conclusive but not sufficient for classification
2.13.	Oxidising liquids	none	/	none	Not adequate
2.14.	Oxidising solids	none	/	none	Conclusive but not sufficient for classification
2.15.	Organic peroxides	none	/	none	Not adequate

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2.16.	Substance and mixtures corrosive to metals	none	/	none	Conclusive but not sufficient for classification
3.1.	Acute toxicity - oral	Acute Tox. 3 - H301		Acute Tox. 4* - H302	
	Acute toxicity - dermal	Acute Tox. 3 - H311		Acute Tox. 4* - H312	
	Acute toxicity - inhalation				Not evaluated
3.2.	Skin corrosion / irritation			Skin Irrit. 2 - H315	Not evaluated
3.3.	Serious eye damage / eye irritation			Eye Irrit. 2 - H319	Not evaluated
3.4.	Respiratory sensitisation				Not evaluated
3.4.	Skin sensitisation				Not evaluated
3.5.	Germ cell mutagenicity	Mutagen 2 - H341			
3.6.	Carcinogenicity	Carcinogen 2 - H351			
3.7.	Reproductive toxicity				Not evaluated
3.8.	Specific target organ toxicity –single exposure				Not evaluated
3.9.	Specific target organ toxicity – repeated exposure				Not evaluated
3.10.	Aspiration hazard				Not evaluated
4.1.	Hazardous to the aquatic environment				Not evaluated
5.1.	Hazardous to the ozone layer				Not evaluated

¹⁾ Including specific concentration limits (SCLs) and M-factors

²⁾ Data lacking, inconclusive, or conclusive but not sufficient for classification

Labelling:

Signal word: Danger

Hazard pictogram: GHS06, GHS07, GHS08

Hazard statements:

H301: Toxic if swallowed.

H311: Toxic in contact with skin.

H315: Causes skin irritation.

H319: Causes serious eye irritation

H341: Suspected of causing genetic defects

H351: Suspected of causing cancer

Proposed notes assigned to an entry: none

2 BACKGROUND TO THE CLH PROPOSAL

2.1 History of the previous classification and labelling

Pyrocatechol is a chemical substance that has previously been assessed for harmonized classification and labelling. Pyrocatechol was included in directive 91/325/EEC (ATP12). Pyrocatechol is currently classified as Acute Tox. 4 (*) (H312), Acute Tox. 4 (*) (H302), Eye Irrit. 2 (H319) and Skin Irrit. 2 (H315) according to Annex VI of CLP regulation.

2.2 Short summary of the scientific justification for the CLH proposal

This proposal is based on the information as available in the registration dossiers of pyrocatechol and on literature search. Pyrocatechol has shown genotoxicity and carcinogenicity in available animal experiments.

Most of *in vitro* studies available indicated a genotoxic effect of pyrocatechol on different animals and human somatic cells lines studied. However, *in vivo* experiment showed contradictory results about the potential genotoxicity of pyrocatechol. Clear evidences of genotoxicity on rat (Study report n°18255 2008; Mirvish et al. 1985) and clastogenicity on mice (Marrazzini et al. 1994) have been shown. Two others supportive experiments confirmed the ability of pyrocatechol to induce micronuclei formation in bone marrow cells, although some contradictory results were observed without clear explanation.

Carcinogenicity, co-carcinogenicity or tumour promotion studies with pyrocatechol demonstrated the carcinogenic effect on catechol on glandular stomach on rats with formation on adenomas or adenocarcinomas. It is important to notice that effects appeared at high dose of 0.4% and mainly 0.8%. The lowest doses tested presented submucosal hyperplasia indicating that repeated administration of important dose at the site of application (stomach) lead to toxic effect for which the severe form at high dose were carcinoma and adenocarcinoma. Among three species studied (rat, mouse and hamster), rat was clearly the most sensitive. According to data available, catechol did not exert carcinogen effect on other organs than the site of application after oral administration: esophagus and stomach (glandular and forestomach) of rat.

IARC (1999) classify pyrocatechol as possibly carcinogenic to humans (Group 2B).

2.2.1 Current classification and labelling in Annex VI, Table 3.1 in the CLP Regulation

Acute Tox. 4 (*) H312

Acute Tox. 4 (*) H302

Eye Irrit. 2 H319

Skin Irrit. 2 H315

GHS07 Wng

2.2.2 Current classification and labelling in Annex VI, Table 3.2 in the CLP Regulation

Classification: Xn; R21/R22

Xi; R36/38

Labelling: Xn

R: 21/22-36/38

S: (2-)22-26-37

2.3 Current self-classification and labelling

2.3.1 Current self-classification and labelling based on the CLP Regulation criteria

Self-classification for mutagenicity as Mut. 2 and carcinogenicity as Carc. 2. were done by 124 and 47 notifiers, respectively. A summary is provided in the table below.

Table 4: Hazard Class, Category Codes(s), Hazard statement Code(s) according to notifiers

Hazard Class and Category Code(s)	Hazard Statement Code(s)	Number of Notifiers
Acute Tox. 4	H302	1569
Acute Tox. 4	H312	67
Acute Tox. 4	H332	9
Skin Irrit. 2	H315	1711
Eye Irrit. 2	H319	1641
Eye Dam. 1	H318	60
Skin Sens. 1	H317	64
Muta 2	H341	124
No classification Mutagen		1588
Carc. 2	H351	47
No classification carcinogen		1665

RAC general comment

1,2-Dihydroxybenzene (CAS number 120-80-9) or Pyrocatechol is a substance with anti-oxidant properties, which already has an entry in Annex VI of Regulation (EC) No 1272/2008 (CLP Regulation) and is currently classified as Acute Tox. 4* (H312), Acute Tox. 4* (H302), Eye Irrit. 2 (H319) and Skin Irrit. 2 (H315).

The current CLH proposal was based on the information available in the registration dossiers for pyrocatechol and on literature data.

No human data on pyrocatechol toxicity were included in the CLH dossier except for a study (Hirosawa, 1976) that reported exposure of 13 workers to vapours of pyrocatechol and phenol, with major reported side-effects being complaints related to the upper respiratory tract. Blood pressure and body temperature remained normal and no signs of hepatic or renal dysfunction were observed. These results were not considered by the DS and RAC to be relevant for classification.

3 JUSTIFICATION THAT ACTION IS NEEDED AT COMMUNITY LEVEL

A substance with the classification of Mut. 2 (H341) and Carc. 2 (H351) is normally subject to harmonised classification (CLP article 36.1). Based on the available data from the registration dossier

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and scientific literature, classification for the endpoint mutagenicity (Mut.2; H341) and carcinogenicity (Carc. 2; H351) are warranted.

Pyrocatechol is currently classified as Acute Tox. 4 (*) (H312), Acute Tox. 4 (*) (H302), Eye Irrit. 2 (H319) and Skin Irrit. 2 (H315) according to Annex VI of CLP.

Acute toxicity data from oral and dermal route of pyrocatechol are also presented in this report in order to update the minimum acute toxicity classification of pyrocatechol with the new criteria of CLP regulation.

Part B.

SCIENTIFIC EVALUATION OF THE DATA

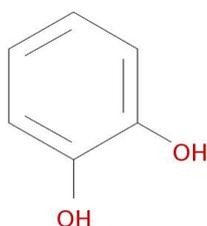
1 IDENTITY OF THE SUBSTANCE

1.1 Name and other identifiers of the substance

Table 5: Substance identity

EC number:	204-427-5
EC name:	<i>1,2-dihydroxybenzene; pyrocatechol</i>
CAS number:	120-80-9
CAS name:	1,2-dihydroxybenzene; 1,2-Dihydroxybenzene; 1,2-Benzenediol
IUPAC name:	Pyrocatechol
CLP Annex VI Index number:	604-016-00-4
Molecular formula:	C ₆ H ₆ O ₂
Molecular weight range:	110 g/mol

Structural formula:



1.2 Composition of the substance

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Table 6: Constituents (non-confidential information)

Constituent	Typical concentration	Concentration range	Remarks
Pyrocatechol	≥ 98.5 %	985 – 1000 g/kg	/

Table 7: Impurities (non-confidential information)

Impurity	Typical concentration	Concentration range	Remarks
No data			

Table 8: Additives (non-confidential information)

Additive	Function	Typical concentration	Concentration range	Remarks
/				

1.2.1 Composition of test material

The minimum purity is specified to be minimum 98.5%.

1.3 Physico-chemical properties

Table 9: Summary of physico - chemical properties

Property	Value	Reference	Comment (e.g. measured or estimated)
State of the substance at 20°C and 101,3 kPa	Beige brown solid	Ferron, 2010	
Melting/freezing point	105°C	Several references	Review of different handbooks
Boiling point	245.5°C	Several references	Review of different handbooks
Relative density	1.3 to 1.4 at 15°C	Several references	Review of different handbooks
Vapour pressure	133 hPa at 176°C; 266 hPa at 197.7°C; 533 hPa at 221.5°C	Several references	Review of different handbooks
Surface tension	Data waiving		Based on the structure
Water solubility	235 to 584 g/L at 20 - 25°C.	Several references	Review of different handbooks
Partition coefficient n-octanol/water	0.84 to 1.03.	Several references	Review of different handbooks
Flash point	127°C	Several references	Review of different handbooks
Flammability	Not flammable	Ferron, 2010	Method EU A 10 was used
Explosive properties	Data waiving		Based on the structure

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Self-ignition temperature	510°C	Kirk-Othmer, 1981	handbook
Oxidising properties	Data waiving		Based on the structure
Granulometry	D10: 60.5 µm D50: 113.1 µm D90: 197 µm	Masson, 2010	Laser diffraction
Stability in organic solvents and identity of relevant degradation products	Solubility at 20°C: 660 g/L in acetone; 582 g/L in ethanol; 19 g/L in chloroform; 1 g/L in carbon tetrachloride; 8 g/L in benzene. Solubility at 25°C: 740 g/L in ethyl alcohol; 653 g/L in ethyl ether; 752 g/L in acetone; 73 g/L in benzene; 7 g/L in chloroform.	Several references	Review of different handbooks
Dissociation constant	pKa1 = 9.23 and pKa2 = 13.05	Sergeant E.P., Dempsey B, 1979	Not indicated
Viscosity			

2 MANUFACTURE AND USES

2.1 Manufacture

Not relevant for this dossier.

2.2 Identified uses

Pyrocatechol is a major intermediate for synthesis of molecules for agrochemicals use. It is an intermediate for perfumes, cosmetics, aromas. It is also used in various areas such as: anticorrosion agent; antioxidant for rubber, olefins and polyofins, polyurethanes; therapeutic agent; bonding agents; tanning agent, synthetic tannins or photography; catalysts.

3 CLASSIFICATION FOR PHYSICO-CHEMICAL PROPERTIES

Not relevant for this dossier.

4 HUMAN HEALTH HAZARD ASSESSMENT

In the CLH report, catechol is used synonymously with pyrocatechol.

Studies selected for evaluating acute toxicity, mutagenicity and carcinogenicity of pyrocatechol are collected from registration dossier, and also from literature.

3.1 Toxicokinetics (absorption, metabolism, distribution and elimination)

From the dissemination website, some data are available that are presented here as supportive data for other endpoints. The reliability of the data has not been challenged.

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After injection

There are 2 publications of Greenlee (1981a, 1981b) recorded on the dissemination website evaluating the distribution of pyrocatechol. They are all performed *in vivo* and quoted of reliability 2 according to Klimisch scales by the registrant.

- [¹⁴C] Catechol in saline solution were administered into the lateral vein of male rats at concentration of 1.2 mg/kg alone or with simultaneous administration with non-labelled catechol at dose of 12 mg/kg bw. It was shown that, the radioactivity was concentrated in the bone marrow and lymphoid organs (Greenlee, 1981b).

- [¹⁴C] Catechol was administered for 2 hours into the lateral vein of male rats at concentration of 14 mg/kg in rats pre-treated or not five days prior with 500 mg/kg ip injection of Arochlor 1254 solution in corn oil. Rats were sacrificed 2 or 24 hours after dosing. Liver, thymus and bone marrow were analysed for total radioactivity. After 2 h, the amount of soluble radioactivity measured in liver, thymus, and bone marrow ranged from 149 to 370 dpm/mg protein. After 24 h, the amount of soluble radioactivity measured in liver and thymus was markedly lower than at 2 h., whereas in bone marrow no statistically significant difference was found.

According to these two studies, after IV administration, bone-marrow seems to be exposed. No data after oral or inhalation exposure are available on distribution of catechol in bone marrow or reproductive organs.

The following summary is included in the monograph of IARC on pyrocatechol vol. 71: “Proposed metabolic pathways of catechol are summarized in Figure 1. The major metabolic pathways in experimental animals are sulfation and glucuronidation. Catechol may be oxidized by peroxidases to the reactive intermediate benzo-1,2-quinone, which readily binds to proteins (Bhat et al., 1988); this process, catalysed by rat or human bone-marrow cells in the presence of H₂O₂ (0.1 mM), is stimulated by phenol (0.1–10 mM), and decreased by hydroquinone and by glutathione, which conjugates with benzo-1,2-quinone. These phenols (phenol, catechol and hydroquinone) may play a role in benzene toxicity to bone marrow: all three are formed as benzene metabolites (Smith et al., 1989) and they interact in several ways as far as their bioactivation by (myelo)peroxidases is concerned (Smith et al., 1989; Subrahmanyam et al., 1990).

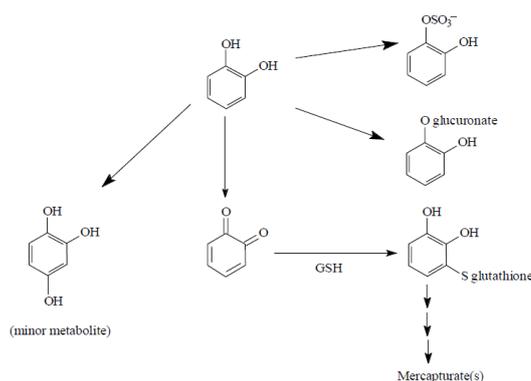


Figure 1: metabolism of catechol (IARC monographs vol. 71)

After inhalation:

- [³H] catechol was used to follow the kinetics and metabolic fate of inhaled catechol in cigarette smoke in Mice. 2 to 2.3 μCi [³H] catechol was present in reconstituted cigarette. Mice were exposed to 10% (v/v) 2R1 cigarette smoke on nose only and received 35mL puff volume, 2 sec/puff, 10 puffs/cigarette for 0, 5, 10, 30, 60 and 120 minutes. The deposition and distribution of inhaled catechol were determined in all internal tissues, urine and faeces. Data showed that clearance was

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occurring during the 10 minutes smoke exposure period. Immediately after exposure, over 50% of the radioactivity was found in the blood, with 10% found in the lung, and approximately 12% in the respiratory tract. Over 91% of the inhaled radioactivity was found in the urine 120 minutes after exposure. Less than 0.5% of the total dose was found in the lung at this time. Catechol is rapidly absorbed, redistributed, and excreted from mice exposed to whole cigarette smoke (Hwang, 1982).

13 workers were exposed to vapours of catechol and phenol (Hirosawa, 1976). The dose for catechol was 1.8 ppb and occasionally 70 ppb. Main complaints of the workers were related to upper respiratory tract, such was confirmed by CMI health questionnaire and clinical examination. The biological half-life of catechol measured was 3 -7h, similar than for phenol. Although catechol is well-known inhibitor of catecholamine o-methyl transferase, the exposure at the level studied did not modify catecholamine metabolism; the daily excretion of catecholamines and their metabolites in urine remained within the normal range except for a slight decrease in noradrenaline excretion. Blood pressure and body temperature during and right after exposure also remained normal. There were no signs of hepatic and renal dysfunction. Regarding result obtained in this study, catechol was rapidly eliminated *via* urine after inhalation exposure (half-life 3 -7h) and seemed not to bioaccumulate.

After inhalation exposure, catechol was rapidly and largely absorbed and found in the blood, lung, and eliminated via urine. Catechol was rapidly eliminated via urine after inhalation exposure (half-life 3 -7h).

3.2 Acute toxicity

This part is a copy/paste from the dissemination website. eMSCA did not access the original studies/publication.

3.2.1 Non-human information

3.2.1.1 Acute toxicity: oral

The results of studies on acute toxicity after oral administration are summarised in the following table. Only the two references that were published are included below. The two other studies were not included as they were secondary literature and no details were provided.

Table 10: Studies on acute toxicity after oral administration

Method	Results	Remarks	Reference
rat (albino) male oral: gavage equivalent or similar to Federal register 5 males/dose	LD ₅₀ : 300 mg/kg bw (male) (95% C.L. 200- 500 mg/kg bw) Mortality: 0/5 at 158 mg/kg 2/5 at 316 mg/kg bw 5/5 at 630 mg/kg bw 5/5 at 1260 mg/kg	2 (reliable with restrictions: The purity of the test substance and the strain of rat used are not known. The administration volume and the use of vehicle are not specified.) key study experimental result Test material (EC name): pyrocatechol	Flickinger C.W. (1976)

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Rat Method: other	LD ₅₀ : 358 mg/kg bw	2 (reliable with restrictions) weight of evidence experimental result Test material (EC name): pyrocatechol	Lewis RJ (1996a) Anonymous (1972)
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3.2.1.2 Acute toxicity: inhalation

Not relevant for this dossier.

3.2.1.3 Acute toxicity: dermal

The results of studies on acute toxicity after dermal administration are summarised in the following table:

Table 11: Studies on acute toxicity after dermal administration

Method	Results	Remarks	Reference
rat (Crj: CD(SD)) male/female Coverage: openequivalent or similar to OECD Guideline 402 (Acute Dermal Toxicity)	LD ₅₀ : 600 mg/kg bw (male/female)	2 (reliable with restrictions) key study experimental result Test material (EC name): pyrocatechol	Study reportn ^o 16948 (1973)
rabbit (albino) male equivalent or similar to Federal register	LD ₅₀ : 800 mg/kg bw (male)	2 (reliable with restrictions) key study experimental result Test material (EC name): pyrocatechol	Flickinger C.W. (1976)

3.2.1.4 Acute toxicity: other routes

3.2.2 Human information

No data available.

3.2.3 Summary and discussion of acute toxicity

- Oral route:

Four studies were available but two of them were retained: one as key study and another as supportive evidence because they were reliability 2.

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Based on the executive summary provided by the lead registrant, in an acute oral toxicity study (Flickinger, 1976), groups of 5 albino male rats were given a single oral dose of catechol at doses of 0, 158, 316, 630 and 1260 mg/kg bw and observed for 14 days.

No death occurred at 158 mg/kg bw, 2/5 died at 316 mg/kg bw and 5/5 at 630 mg/kg bw within 1 hour.

No clinical signs were reported and the autopsy revealed for rats died during the study: hyperaemia of the stomach and intestines. None of the rats sacrificed at the end of the experiment revealed gross pathology after pathological examination. No summary was provided by Lewis, 1996, the data originated from an Estonian study from 1972.

- Dermal route:

Two studies were available, from one study report and from one publication. They were selected as key studies and had reliability 2. The summary of the study report is the following:

In an acute dermal toxicity study (Study n° 16948, 1973), CD male and female rats (5/sex/group) were exposed to Catechol by dermal route for a maximum of 24 hours, at doses of 125, 875 and 1125 mg/kg bw. Animals then were observed for 15 days.

0/10 died at 125 mg/kg and no clinical signs, and 10/10 died at 875 and 1125 mg/kg, the rats presented tremors 5 minutes after dermal application, and died within 30 minutes after clonic convulsions.

In the second study (Flickinger, 1976), skin was abraded and 4 rabbits per dose were used. Abrasion may alter skin permeability. Abraded and intact skin of each group of male albino rabbits (age unknown) was in contact with catechol for a maximum period of 24 h. The number of death at each dose levels and time of death was as follows: no death occurred at the dose of 250 mg/kg bw, 1/4 rabbit died at the dose of 500 mg/kg bw on day 2, 2/4 rabbits died at the dose of 1000 mg/kg bw by day 2, 4/4 rabbits died at the dose of 2000 mg/kg bw on day 1.

The effects observed after dermal administration were local effect (All the rabbits that died during the observation period revealed subdermal hyperaemia and oedema) and death with LD₅₀= 800 mg/kg bw (95% C.I.: 500-1400) in male rabbits.

3.2.4 Comparison with criteria

Oral LD₅₀ Males = 300 mg/kg bw (95% C. L. 200-500 mg/kg). Catechol is considered as toxic based on the LD₅₀ obtained, and classified as category 3 (H301: Toxic if swallowed) according to classification criteria of EC regulation 1272/2008 and current EC regulation in Annex VI 3.1.

Dermal LD₅₀ Combined = 600 mg/kg bw. Catechol is considered as toxic in contact with the skin and should be classified as category 3 (H311: Toxic in contact with skin) according to classification criteria of EC regulation 1272/2008. Currently the harmonised classification is category 4 H312: Harmful in contact with skin in the Annex VI 3.1.

Criteria for CLP classification of substances as acutely toxic:

Substances can be allocated to one of four toxicity categories based on acute toxicity by the oral, dermal route according to the numeric criteria shown in Table 12. Acute toxicity values are expressed as (approximate) LD 50 (oral, dermal) values or as acute toxicity estimates (ATE). Explanatory notes are shown following Table 12.

Table 12: Acute toxicity hazard categories (oral and dermal) and acute toxicity estimates (ATE) defining the respective categories

Exposure route	Category 1	Category 2	Category 3	Category 4
Oral (mg/kg bodyweight) See: Note (a)	ATE ≤ 5	5 < ATE ≤ 50	50 < ATE ≤ 300	300 < ATE ≤ 2 000
Dermal (mg/kg bodyweight) See: Note (a)	ATE ≤ 50	50 < ATE ≤ 200	200 < ATE ≤ 1 000	1 000 < ATE ≤ 2 000

(a) The acute toxicity estimate (ATE) for the classification of a substance is derived using the LD₅₀ /LC₅₀ where available.

3.2.5 Conclusions on classification and labelling

The following information is taken into account for any hazard assessment:

LD₅₀ oral (rat): 300 mg/kg Acute toxicity - oral: Acute Tox. 3 - H301

LD₅₀ dermal (rat): 600 mg/kg Acute toxicity – dermal: Acute Tox. 3 - H311

RAC evaluation of acute toxicity

Summary of the Dossier Submitter's proposal

Oral route

Two studies conducted in rats with reliability Klimisch score of 2 (Registrants' evaluation, DS agreed) were used for classification purposes by the Dossier Submitter (DS) (Flickinger, 1976; Lewis, 1996).

The oral LD₅₀ for males from the Flickinger (1976) study was established at 300 mg/kg bw (95% confidence level, 200-500 mg/kg bw), while the Lewis (1996) study reported an LD₅₀ of 358 mg/kg bw.

Therefore, based on the LD₅₀ values obtained, the DS proposed that pyrocatechol be classified for acute toxicity in category 3 (H301: Toxic if swallowed) according to the classification criteria in help Regulation. Currently the harmonised classification in Annex VI is category 4*; H302: Harmful if swallowed.

Dermal route

Two studies were available: Study report n° 16948 (1973) and Flickinger (1976). They were both selected by the DS as key studies with reliability scores of 2.

In Study report n° 16948 (1973), an LD₅₀ of 600mg/kg bw (male/female) was reported in rats. In Flickinger (1976) the effects observed after dermal administration in male rabbits were local and an LD₅₀ = 800mg/kg bw (95% confidence interval: 500-1400) was reported.

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Therefore, based on the LD₅₀ values obtained, the DS proposed that pyrocatechol should be classified as Acute Tox.3 (H311: Toxic in contact with skin) according to classification criteria of the CLP Regulation. Currently the harmonised classification in Annex VI is category 4*; H312: Harmful in contact with skin.

Inhalation route

No data were available in the CLH report.

Comments received during public consultation

During public consultation (PC), two comments were received on the acute toxicity endpoint via oral and dermal exposure. One Member State Competent Authority (MSCA) supported the classification proposed by the DS. In the same context, all REACH registrants supported the proposed classification of pyrocatechol for acute toxicity category 3 for oral and dermal route. This classification has already been implemented by the REACH registrants in the registration dossier.

Assessment and comparison with the classification criteria

All studies summarised in the CLH report by the DS were from the registration dossier and the data were retrieved from ECHA dissemination website. The DS included in the CLH report only studies that were published in the literature, either in peer reviewed journals or in books.

Oral route

Four studies were available in the registration dossier but only two of them were included in the CLH report: Flickinger (1976) as the key study and Lewis (1996) as supportive evidence. Both studies are reported as having reliability scores of 2.

Based on the executive summary provided by the lead registrant in the registration dossier, in an acute oral toxicity study (Flickinger, 1976), groups of 5 albino male rats were given a single oral dose of pyrocatechol at doses of 0, 158, 316, 630 and 1260 mg/kg bw and observed for 14 days. The mortality incidences are summarized in the following Table:

Administered dose (mg/kg bw)	Mortality (number of deaths in total of 5 animals per dosage group)
158	0
316	2 (1 on day 1, 1 on day 2)
630	5 (all 5 in less than 1 day)
1260	5 (within 1 hour)

No clinical signs were reported and the autopsy on rats that died during the study revealed hyperaemia of the stomach and intestines. None of the rats that did not die but were sacrificed at the end of the experiment revealed gross pathology after pathological examination.

It is worth noting the time within which deaths were observed at each dose.

The oral LD₅₀ for males was calculated by Flickinger (1976) to be 300 mg/kg bw (95% confidence level, 200-500 mg/kg bw). The author did not state the statistical test used. In addition, the purity of the test substance and the strain of rat used are not known. The administration volume and the use of vehicle were not specified. These deviations lower the reliability of this study to a higher Klimisch score. Probit statistical analysis of the Flickinger (1976) data in the above Table (Cambridge, England, Cambridge University Press, <https://www.medcalc.org/manual/probitregression.php>), revealed an LD₅₀ = 287 mg/kg bw, with confidence levels at 95% = 100-473 mg/kg bw.

The Lewis (1996) study, which in the registration dossier, where no summary is present, has been assessed as reliable with restriction (Klimisch 2), is based on data from a 1972 publication. An LD₅₀ of 358 mg/kg bw is reported, but the original data were not available in the CLH report. Furthermore, no test substance information was available, no reference was

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made to a guideline, sex & strain of the animals were not specified, all of which point to a low reliability study.

Due to lack of other evidence, the RAC decided to accept the LD₅₀ values reported in the literature.

Based on the Guidance on the Application of the CLP Criteria (version 4.1. 2015, CLP guidance, section 3.1.2.3.2), the lowest ATE value available is considered for classification. Therefore, according to Table 3.1.1 of Annex I of CLP, RAC agrees to the DS proposal to classify pyrocatechol as **acute toxicity oral, category 3, H301: Toxic if swallowed, with an ATE value of 300 mg/kg bw.**

Dermal route

Two studies were available, both of with reliability scores (Klimisch) of 2: Study report n° 16948 (1973) and Flickinger (1976).

In an acute dermal toxicity study (Study n° 16948, 1973), CD male and female rats (5/sex/group) were exposed to pyrocatechol by the dermal route for a maximum of 24 hours, at doses of 125, 875 and 1125 mg/kg bw. Animals were then observed for 15 days. The results are summarized in the following table and an LD₅₀ 600 mg/kg bw was reported, without any further information on the statistical method used:

Administered dose (mg/kg bw)	Mortality (number of deaths in total of 10 animals per dosage group)	Observations
125	0	No clinical signs
875	10	Tremors 5 minutes after dermal application. Death within 30 minutes after clonic convulsions.
1125	10	

In the second study (Flickinger, 1976), the skin was abraded and 4 rabbits per dose were used. Abrasion may alter skin permeability. Abraded and intact skin of each group of male albino rabbits (age unknown) was in contact with pyrocatechol for a maximum of 24 h. The number of deaths at each dose and times at which the deaths occurred were as follows:

Administered dose (mg/kg bw)	Mortality (number of deaths in total of 4 animals per dosage group)	Observations
250	0	
500	1	Death on day 2
1000	2	Death on day 2
2000	4	Death on day 1

All the rabbits that died during the observation period revealed subdermal hyperaemia and oedema. An LD₅₀ = 800 mg/kg bw (95% C.I.: 500-1400) in male rabbits was reported in the manuscript by the author, without any further information on the statistical method used.

The RAC decided to accept the reported LD₅₀ values in the literature.

Based on the CLP guidance (section 3.1.2.3.2), the lowest ATE value available is considered for classification. Therefore, according to Table 3.1.1 of Annex I of CLP, RAC agrees with the DS proposal to classify pyrocatechol for acute toxicity (dermal route), in **category 3, H311: Toxic in contact with skin, with an ATE of 600 mg/kg bw.**

3.3 Specific target organ toxicity – single exposure (STOT SE)

Not relevant for this dossier.

3.4 Irritation

Not relevant for this dossier.

3.5 Corrosivity

Not relevant for this dossier.

3.6 Sensitisation

Not relevant for this dossier.

3.7 Repeated dose toxicity

Not relevant for this dossier.

3.8 Specific target organ toxicity (CLP Regulation) – repeated exposure (STOT RE)

Not relevant for this dossier.

3.9 Germ cell mutagenicity (Mutagenicity)

4.9.1. Non-human information

4.9.1.1. *In vitro* data

Studies selected for evaluating mutagenicity of pyrocatechol *in vitro* are mainly collected from CSR report and also from literature. As a considerable number of papers (around 60) are proposed in the registration dossier of pyrocatechol, data with not enough details on test conditions and results are not reported. Most of the reported studies are reliability 2 (n=21) according to CSR and only few studies are reliability 3 (n=6) because of the lack of details about controls.

In vitro gene mutation assays on bacterial cells

Mutagenicity of pyrocatechol was studied on bacteria strains using bacterial reverse mutation assay. This assay is similar to OECD 471 but none of the studies was performed according to the current OECD guideline 471. Five studies were considered of reliability 2 (with restrictions). Results from 3 studies indicated no mutagenic activity with and without metabolic activation in all strains of *Salmonella Typhimurium* tested (TA 98, TA 100, TA 1535, TA 1537, TA 1538) (Study report n° FSR-IPL 060904-01 2007; Study report n°7960 05 1983; Study report n°7961 03 1983; Study report n° BOA/PA T/73 988, 1983; Haworth et al. 1983). Only two studies showed mutagenic activity. In a screening micromethod assay of the Ames test performed without repetition, positive results were observed with *Salmonella typhimurium* TA 102 without S9-mix and with kidney S9-mix but not with liver S9-mix (Study report n° FSR-IPL 060904-01 2007). The positive response of strain TA 102 is probably due to a substitution of AT to GC by oxidative mechanism. Positive results were also obtained with *Escherichia coli* WP2 uvrA/pKM101 strain IC203 without S9 but not with S9 (Martinez, 2000). Strain IC203, deficient in OxyR (its oxyR⁺ parent is WP2 uvrAr/pKM101 denoted IC188, which is the common strain used in the guideline Ames study), is more sensitive to mutation

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induced by oxidative damage. In this study, negative response was observed with WP2 uvrA/pKM101 strain IC188 (with and without S9-mix).

In vitro gene mutation assays on mammalian cells

Mutagenicity of pyrocatechol was also studied on mammalian cells. Results were positive for the 3 studies selected (reliability 2) performed according to a protocol similar to OECD guideline 476. In the study of Tsutsui et al. (1997), mutation induction was observed on SHE cells starting from 3 μM (0.33 $\mu\text{g/ml}$) and 10 μM (1.1 $\mu\text{g/ml}$) of catechol for HPRT and 10 μM and 30 μM for Na^+/K^+ ATPase locus, respectively. However, mutation inductions of Na^+/K^+ ATPase locus were observed at cytotoxic concentrations (decreased cell survival to 28.8% and 1.4% of untreated cells at the concentration of 10 and 30 μM , respectively). The study of Mc Gregor et al. (1988) revealed similar results with mutation induction at cytotoxic concentration on mouse lymphoma cells. They observed that the lowest observed effective dose based on mutagenic potencies or producing cytotoxic effect (without metabolic activation) was 2.5 $\mu\text{g/ml}$ (25 μM). The mutagenic potential of catechol was completely negated by coincubation with Superoxide Dismutase (SOD). It was noticed that SOD had little effect upon cytotoxicity. Another study on mouse lymphoma cells showed that catechol was found to increase the mutation frequency in a non-dose dependent manner, without metabolic activation (Wangenheim and Bolcsfoldi 1988).

In vitro mammalian chromosome Aberration test

All studies selected for clastogenic endpoint were considered of reliability 2 (with reliable restrictions) and showed positive genotoxic results.

In the study of Tsutsui (1997), Syrian Hamster Embryo (SHE) cells were treated overnight without metabolic activation system with catechol at doses of 0.11 - 0.33 - 1.1 - 3.3 - 11 $\mu\text{g/ml}$ (1 - 3 - 10 - 30 - 100 μM) in presence of BrdU. Similar experiments were performed 2 or 3 times, and the results obtained were reproducible. Negative results were obtained at 1 and 3 μM . Sister Chromatid Exchange (SCE) in SHE cells occurred with catechol at cytotoxic concentrations of 10 μM (11.06 SCEs/cell) and 30 μM (15.40 SCEs/cell). At 100 μM , catechol was overly toxic to obtain SCEs data. This study assessed also chromosome aberration or aneuploidy on SHE cells after 6, 24 or 48 h of exposure to catechol (3, 10, and 30 μM) without metabolic activation system. Even though no significant effect was observed at 3 and 10 μM , a slight aneuploidy in the near diploid range of SHE cells was significantly induced by catechol at 30 μM after 48 h.

Another study on chromosomal aberration was performed on lung fibroblasts (V79 cells) exposed to different concentration of catechol (0 - 20 - 40 - 60 - 80 μM) at different pH values (6.0, 7.4 and 8.0, with and without metabolic activation system from Wistar rat liver induced with Aroclor 1254 at pH 7.4) (Do Ceu et al. 2003). Results showed that clastogenic effect of catechol was dependent on the pH: non-significant increase in chromosomal aberrations at pH 6.0, at any dose-level. Catechol induced significant chromosomal aberrations at the 3 three highest concentrations tested (40-60-80 μM) and at the 2 highest concentrations tested (40-60 μM) at pH values of 7.4 and 8.0, respectively. It showed also a significant induction of multi-aberrant cells (with more than 10 chromosomal aberrations), which represent in some cases more than 50% of the aberrant cells.

Clastogenic effect of catechol was confirmed on micronucleus test on L5178Y mouse lymphoma cells with micronucleus test (micromethod) (Study report n° FSR-IPL 060505-01, 2007). Results showed that catechol (from 5 to 156 $\mu\text{g/ml}$) induced a significant genotoxic effect on L5178Y mouse lymphoma cells, both without and with metabolic activation (by means of liver or kidney S9-mix). Even though the positive controls induced the appropriate responses in the corresponding assays, nevertheless this experiment was performed without repetition.

The capacity of catechol to induce chromatid breaks and exchanges in Chinese Hamster Ovary (CHO) cells was evaluated by Stich et al. (1981). Catechol (50 µg/mL or 454 µM) exhibited a chromosome-damaging potential (chromatid break or exchange) and the addition of an S9 mixture reduced its clastogenic activity. These authors showed that treatment with S9 mix, catalase + SOD, and catalase or SOD alone did not lead to a significant reduction on the level of chromosomal aberration induced by the catechol. However, the addition of S9 mix with catalase + SOD leads to a reduction in the number of multi-aberrant cells. It was also observed that OH* radicals were produced, so a participation of a radical-type mechanism cannot be excluded in the genotoxicity of catechol. In the study of Sze et al., 1996, negative results were shown on CHO cells exposed to catechol at concentrations as high as 250 µM without metabolic activation and no one DNA strand breaks were produced.

Regarding clastogenicity of catechol on human cells, Human lymphocytes were treated to a range of concentration of catechol (from 0.5 to 250 µM) without metabolic activation system (Yager et al., 1990). Statistical significant increase of micronucleated cells was observed starting from 0.5 µM and decrease of cell viability was measured starting from 100 µM. A significant dose related increases in kinetochore-positive micronucleated cells was noticed suggesting that catechol was likely aneuploidy-inducing agents in Human lymphocytes.

Other studies on DNA damage

Genotoxicity of catechol is also assessed by several methods such as: measuring single/double strand break DNA, alkali-labile sites, unscheduled DNA synthesis, inhibition of DNA synthesis or inhibition of repair system of DNA.

In the study of Cahill (2004), DNA damage and repair was checked in microplates method with *Saccharomyces cerevisiae*. The relative total growth of *Saccharomyces cerevisiae* was assessed by comparing the extent of proliferation of treated and untreated cells. The measurement of total growth was performed by fluorescence collection. Two strains were tested (GENC01 and GEN T01) at concentration of catechol from 177 µg/mL to 880 µg/mL without metabolic activation system. A clear positive response was measured in growth inhibition rate with strain GENC01 at 177 µg/mL, and clear genotoxicity with GFP induction with strain GEN T01 at 599 µg/mL.

In the study of Solveig Walles (1992), performed on rat hepatocytes, the results showed an increase in the rate of elution of DNA corresponding to the formation of single strand breaks (SSB) in DNA. The dose-response curve showed a threshold value of 1 mM after which the DNA damage increased. The viability was about 75% and unchanged after treatment. DNA damage increased slightly with the period of exposure (0, 20, 40 and 60 min) at 3000 µM catechol. When the hepatocytes were pre-treated for 30 min with the Ca²⁺-chelator Quin-2 AM, there was a decrease of the DNA damage, indicating probable oxidative damage. The mechanism for repairing the DNA damage induced was challenged by post-treatment of the hepatocytes with an inhibitor of poly(ADP-ribose) polymerase (3-aminobenzamide - 3AB). Upon such treatment, the level of DNA damage by catechol was increased.

In the study of Pellack-Walker (1985) on mouse L5178YS cells, DNA synthesis inhibition was 65% after a treatment of 30 min at 1000 µM of catechol. Beyond 60 min, a small recovery was observed. However, an irreversible inhibition of DNA synthesis was observed at >1.0 mM. A specific dose-dependent inhibition of DNA synthesis was shown following 30 min of exposure to catechol and 60 min washout which was correlated to the oxidative potential of catechol. Cell viability results showed that concentrations as high as 1.0 mM had no effect on protein synthesis and no effect on membrane integrity (trypan blue dye exclusion).

In the study of Pellack-Walker (1986), concentrations of catechol as high as 1.0 mM did not increase the percentage of single-stranded DNA observed on mouse lymphoma cells line L5178YS.

However, catechol was able to inhibit 52% of the nuclear synthetic activity at 24 μM ($\text{IC}_{50} = 23 \mu\text{M}$) on mouse bone marrow cell (Lee et al. 1989), In a cell-free DNA synthetic system, catechol did not inhibit the incorporation of 3H-thymidine triphosphate up to 24 μM . The viability of the cells was not modified at all test concentrations. For all these *in vitro* studies, cell viability is not affected when genotoxicity is observed.

Three studies on Human cells were available and they were considered of reliability of 2 or 3 according to Klimisch scale. In the study of Fabiani (2001), Human Peripheral Blood Mononuclear Cells (PBMC) was exposed to catechol at following concentrations: 0 - 1.1 - 5.5 - 11 - 22 - 66 $\mu\text{g/mL}$ (0 - 10 - 50 - 100 - 200 - 600 μM) for 4 hours without metabolic activation system. After lysis of cells and elution in specific comet assay conditions, DNA damage was evaluated in single cell gel electrophoresis by fluorescence. The different concentration tested did not reduce cell viability to less than 95% (Trypan blue assay). Catechol did not induce DNA damage at concentrations of 10, 50 and 100 μM . Catechol was only genotoxic at 200 and 600 μM when cells were incubated in PBS (in conditions not pertinent for hazard evaluation for humans because no proteins were present). Very little genotoxic effects of catechol were observed when cells were incubated in RPMI + 5% FCS. In the presence of 5% of serum, cells were completely protected from catechol effects in both media. The positive response was observed when cells were incubated with the 2 highest concentrations of catechol in phosphate serum buffer only. No such results were obtained in RPMI medium, and under more physiological conditions, i. e. following the addition of foetal calf serum. Therefore, the positive result obtained in very simplified medium, without any proteins, appears not relevant.

Another study exposed Human DNA fragments to catechol at doses of 0 - 0.011 - 0.022 - 0.055 - 0.110 - 0.220 - 0.550 - 1.101 - 2.202 $\mu\text{g/mL}$ (0 - 0.1 - 0.2 - 0.5 - 1.0 - 2.0 - 5 - 10 - 20 μM) without metabolic activation system (Hirakawa et al. 2002). DNA damage and measurement of O_2 -generation were evaluated. Catechol was tested with or without the addition of Cu^{2+} and/or NADH. Catechol alone at the concentration of 20 μM (without the addition of Cu^{2+} or NADH) did not produce any DNA damage. Catechol can induce DNA damage only in specific conditions: in presence of NADH and Cu^{2+} . The DNA damage induced by catechol was inhibited by catalase and bathocuprine, a specific chelator of Cu^{2+} . Neither OH^* scavenger nor SOD could inhibit this DNA damage, suggesting the induction of DNA damage mediated cooperatively by H_2O_2 and Cu^{2+} . DNA clivage was observed at Guanine and Thymine sites, and it was due to reactive oxygen species. DNA damage induced by catechol was dependent on specific conditions (presence of NADH and Cu^{2+}) suggesting that the DNA damage was mediated by H_2O_2 and Cu^{2+} .

Oikawa et al. (2001) assessed the formation of 8-oxo-7,8-dihydro-2'-deoxyguanosine (8-oxodG) and its hydrogen peroxide (H_2O_2)-resistant clone HP-100 by using an electrochemical detector coupled to HPLC. Human Leukaemia cell line HL-60 and HP 100 were exposed to different concentrations of catechol without metabolic activation system: 0 - 1.1 - 2.2 - 5.5 $\mu\text{g/mL}$ (0 - 10 - 20 - 50 μM). HP100 cells, known to have a high level of catalase activity, were used to assess if H_2O_2 participates in catechol-induced DNA lesion. Catechol treatment resulted in increased 8-oxodG content in a dose dependent manner in HL-60 cells, but not in HP-100 cells. This increase of 8-oxodG content is indicative of oxidative base damage. DNA ladder (associated with apoptosis) were observed at 50 μM (20 μM just visible) in HL-60 cells, but not in HP-100 cells. Catechol caused DNA damage depending of its concentration in presence of Cu^{2+} . DNA damage was enhanced in presence of 100 μM NADH. Catechol frequently induced piperidine labile sited at thymine residues and it increased 8-oxodG content in calf thymus DNA in presence of Cu^{2+} , but not in absence of Cu^{2+} or in the presence of other metal ions (Fe^{3+} , Co^{2+} , Ni^{2+} , Mn^{2+} or Mg^{2+}).

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Table 13: Summary table of relevant *in vitro* mutagenicity studies for pyrocatechol

Test	Results	Remarks	Reference
<i>In vitro</i> gene mutation in bacterial			
<p>Bacterial reverse mutation assay (e.g. Ames test) (gene mutation)</p> <ul style="list-style-type: none"> - <i>Salmonella typhimurium</i> TA 98, TA 100, TA 1535, TA 1537, TA 1538 - Concentrations tested : 0 - 3.9 - 15.6 - 62.5 - 250 - 1000 µg/plate - Metabolic activation: with and without <p>Equivalent or similar to OECD Guideline 471 (Bacterial Reverse Mutation Assay); non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Negative with and without metabolic activation</p>	<p>Negative for <i>S. typhimurium</i>, other: TA 98, TA 100, TA 1535, TA 1537, TA 1538; Met. Act.: with and without</p> <p>Cytotoxicity: yes (at 1000 µg/plate)</p> <p>Vehicle controls valid: yes; Negative controls valid: not examined; Positive controls valid: yes</p>	<p>Study report n°7961 03 (1983)</p> <p>Study report n°7960 05 (1983)</p>
<p>Bacterial reverse mutation assay (e.g. Ames test) (gene mutation)</p> <ul style="list-style-type: none"> - <i>S. typhimurium</i>: TA 1535, TA 1537, TA 1538, TA 98, TA 100 - Concentrations tested: 0 - 62.5 - 125 - 250 - 500 - 1000 µg/plate equivalent - Metabolic activation: with and without <p>Equivalent or similar to OECD Guideline 471 (Bacterial Reverse Mutation Assay); non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Negative with and without metabolic activation</p>	<p>Negative for <i>S. typhimurium</i>, other: TA 1535, TA 1537, TA 1538, TA 98, TA 100; Met. Act.: with and without</p> <p>Cytotoxicity: yes (> 1000 µg/plate)</p> <p>Vehicle controls valid: not examined; negative controls valid: yes; positive controls valid: yes</p>	<p>Study report n° BOA/PA T/73 988 (1983)</p>
<p>Bacterial reverse mutation assay (e.g. Ames test) (gene mutation)</p> <ul style="list-style-type: none"> - <i>S. typhimurium</i> TA 1535, TA 1537, TA 98, TA 100 - Concentrations tested: <p>Lab. 1: 0 - 11 - 35 - 104 - 333 - 1000 µg/plate</p> <p>Lab. 2: 0 - 33.3 - 100 - 333.3 - 1000 - 3333.3 µg/plate</p> <ul style="list-style-type: none"> - Metabolic activation: with and without <p>Equivalent or similar to OECD Guideline 471 (Bacterial Reverse Mutation Assay): only 4 strains tested instead of 5, positive control used for TA 98 strain without S9 is not the one recommended by the OECD guidelines, 2-AA should not be used as the sole indicator of the efficacy of the S9 Mix; non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Negative with and without metabolic activation</p>	<p>Negative for <i>S. typhimurium</i>: TA 1535, TA 1537, TA 98 and TA 100; Met. Act.: with and without</p> <p>Cytotoxicity: yes, at 3333.3 µg/plate (without metabolic activation)</p> <p>Vehicle controls valid: yes; negative controls valid: not examined; positive controls valid: yes</p>	<p>Haworth S. et al. (1983)</p>
<p>Bacterial reverse mutation assay (e.g. Ames test) (gene mutation)</p> <ul style="list-style-type: none"> - <i>S. typhimurium</i> TA1537, TA98, TA100 and TA102 - 10 concentrations tested from 0 to 5000 µg/plate 	<p>Positive for TA 102, with and without metabolic activation</p>	<p>Positive: Clear mutagenic activity in strain TA102 without and with metabolic activation (no repetition performed)</p> <p>Negative for <i>S. typhimurium</i>: TA1537, TA98 or TA100 in absence or in presence of metabolic activation system</p>	<p>Study report - n° FSR-IPL 060904-01 (2007)</p>

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<p>- Metabolic activation: with S9 mix and without</p> <p>Equivalent or similar to OECD Guideline 471 (Bacterial Reverse Mutation Assay): 4 strains tested instead of 5, Ames test according to micromethod, no repetition performed; non-GLP</p> <p>Reliability 2: reliable with restrictions</p>		<p>Cytotoxicity: yes, at 2500 and 5000 µg/plate</p> <p>Vehicle controls valid: yes ; negative controls valid: not examined; positive controls valid: yes</p>	
<p>WP2 Mutoxitest - Bacterial reverse mutation assay (gene mutation)</p> <ul style="list-style-type: none"> - E. Coli : WP2uvrA/pKM101; IC203 - Concentrations tested: 5 doses including 1000 - 2000 - 3000 µg/plate - Metabolic activation : with and without S9 <p>WP2 bacterial reverse mutation assay analogous to the Ames test, compare the sensitivity of strain IC203 with that of IC188 for the detection of mutagenesis by oxidants</p> <p>No details about controls; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Positive for IC203 strain Negative for IC188 strain</p> <p>Cytotoxicity: at the dose of 2000 µg/disc, the inhibition (millimeters) was 6 mm for IC188, 12 mm for IC203 and 7 mm for IC 203+S9.</p> <p>Mutagenesis and cytotoxicity are inhibited by S9 for IC203</p> <p>Catechol considered as an oxidative mutagen</p> <p>Vehicle controls valid: not examined; negative controls valid: no data; positive controls valid: yes</p>	<p>Martinez et al. (2000)</p>
<i>In vitro</i> gene mutation in mammalian cells			
<p><i>In vitro</i> mammalian cell gene mutation assay (HPRT and Na⁺/K⁺ ATPase loci)</p> <ul style="list-style-type: none"> - Syrian Hamster Embryo (SHE) cells - Concentrations tested: 1-3-10-30 µM - Metabolic activation: without <p>Equivalent or similar to OECD Guideline 476 (<i>In vitro</i> Mammalian Cell Gene Mutation Test)</p> <p>No details about controls; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Catechol induced gene mutation at the two loci in SHE cells: both ouabain-resistant (Na⁺/K⁺-ATPase) and 6-thioguanine resistant (hprt) mutant frequencies were increased in dose dependent manner for TG. HPRT locus : mutations induced starting from 0.33 µg/ml (3µM)</p> <p>Na⁺/K⁺ ATPase locus: mutations induced starting from 10 µM (1.1 µg/ml)</p> <p>Strong cytotoxic effects: 85.2% (1µM), 70.2% (3 µM); 28.8% (10 µM) and 1.4% (30 µM) of survival (Number of colonies scored is between 4160 et 68. Ratio small/ large colonies is not reported.)</p> <p>Vehicle controls valid: not examined; negative control valid: not examined; positive controls valid: not examined</p>	<p>Tsutsui et al. (1997)</p>
<p><i>In vitro</i> Mouse Lymphoma L5178Y Assay</p> <ul style="list-style-type: none"> - L5178Y mouse lymphoma cell - Catechol concentrations tested: 2.5-4-5.5-7-8.5 µg/ml - Metabolic activation: without - Superoxide dismutase (SOD) coincubation treatment : 100 units/ml during 4 hours 	<p>Positive without metabolic activation</p>	<p>Lowest dose effect: 2.5 µg/ml</p> <p>Mutagenic effects not dose-dependent</p> <p>SOD treatment: Inhibition of mutagenic effects starting from the lowest concentration (2.5 µg/ml)</p> <p>Cytotoxic effect observed with or without SOD treatment (starting from 2.5 µg/ml)</p> <p>Negative control valid: yes</p>	<p>Mc Gregor et al. (1988)</p>

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<p>Equivalent or similar to OECD Guideline 476 (<i>In vitro</i> Mammalian Cell Gene Mutation Test)</p> <p>No metabolic activation and no positive control used; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>			
<p><i>In vitro</i> Mouse Lymphoma L5178Y Assay</p> <ul style="list-style-type: none"> - L5178Y mouse lymphoma cell - Concentrations : 0 - 1.145 - 2.874 - 5.516 - 11.450 - 28.736 µg/mL - Exposure time : 4 hours - Metabolic activation: without <p>Equivalent or similar to OECD Guideline 476 (<i>In vitro</i> Mammalian Cell Gene Mutation Test)</p> <p>No metabolic activation and no positive control used; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Positive results : Increase of the mutation frequency in a non-dose dependent manner at all concentrations tested, without metabolic activation</p> <p>Cytotoxicity: not examined</p> <p>Vehicle controls valid: yes; negative control valid: not examined; positive controls valid: not examined</p>	<p>Wangenhein and Bolcsfoldi (1988)</p>
<i>In vitro</i> clastogenic effects in mammalian cells			
<p><i>In vitro</i> Sister chromatid exchange assay</p> <ul style="list-style-type: none"> - Syrian Hamster Embryo cells - Concentrations tested:1-3-10-30-100 µM - Metabolic activation: without <p>Equivalent or similar to OECD Guideline 479 (Genetic Toxicology: <i>In vitro</i> Sister Chromatid Exchange Assay in Mammalian Cells)</p> <p>No metabolic activation, no positive control mentioned and positive responses obtained only at cytotoxic concentrations; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Significant increase of sister chromatid exchange at 10 µM (1.1 µg/ml) and 30 µM (3.3 µg/ml)</p> <p>Cytotoxicity: inhibition of growth at doses greater than 10 µM (1.1 µg/ml)</p> <p>Vehicle controls valid: not examined; negative control valid: yes; positive controls valid: not examined</p>	<p>Tsutsui et al. (1997)</p>
<p><i>In vitro</i> sister chromatid exchange assay</p> <ul style="list-style-type: none"> - Human T-Lymphocytes (collected from 1 single donor) - Material purity: 99+% - Concentrations: 5-50-70-100-300 µM - Metabolic Activation: Without <p>Equivalent or Similar to OECD 479 (Genetic Toxicology: <i>In vitro</i> Sister Chromatid Exchange Assay in Mammalian Cells)</p> <p>Results obtained with the lymphocyte of a single donor ;Test performed without metabolic activation and no details about positive controls ; the number of replicated tested is not mentioned; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic system</p>	<p>Significant increase of SCE frequency (concentration-dependent),</p> <p>Decreases in mitotic indices, and Inhibition of cell cycle kinetics.</p> <p>Lowest effective dose: 5 µM</p> <p>Cytotoxic effects: 300 µM</p> <p>Negative control: not examined; vehicle control: yes (valid); positive control: not examined</p>	<p>Erexson et al. (1985)</p>
<p><i>In vitro</i> sister chromatid exchange assay (SCE)</p> <ul style="list-style-type: none"> - Human lymphocytes - Concentrations:0- 1.6 – 8 -40 -200 - 1000 µM 	<p>Positive without metabolic activation</p>	<p>Induction of sister chromatid exchanges and delays cell division at 40 and 200 µM</p>	<p>Morimoto and Wolff (1980)</p>

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<p>- Exposure time: 72h - Metabolic Activation: Without Equivalent or similar to OECD 479 (Genetic Toxicology: <i>In vitro</i> Sister Chromatid Exchange Assay in Mammalian Cells) Test only performed with metabolic activation; induction of SCE observed at cytotoxic concentration; 50 cells scored for SCE's and no data about replicates and positive controls; Non-GLP Reliability 3</p>		<p>Estimated concentration to induce SCE doubling: 30 µM (3.3 µg/ml) Cytotoxicity: yes at 40 µM Negative control: yes (valid); vehicle control: not examined; positive control: not examined</p>	
<p><i>In vitro</i> sister chromatid exchange assay - Human lymphocytes - Concentration: 0.3 mM - Time: 2h - Metabolic activation: without Similar or Equivalent to OECD 479 (Genetic Toxicology: <i>In vitro</i> Sister Chromatid Exchange Assay in Mammalian Cells) Only without metabolic activation; Cytotoxicity not checked ; only one concentration tested ; Non-GLP Reliability 3</p>	<p>Positive without metabolic activation</p>	<p><u>GSH treatment (3 mM)</u>: No induction of sister chromatid <u>No GSH treatment</u>: Significant induction of sister chromatid exchanges by catechol at 0.3 mM without metabolic activation Cytotoxicity: not evaluated Vehicle controls valid: yes; negative control: not examined; positive controls valid: not examined</p>	<p>Morimoto (1983)</p>
<p><i>In vitro</i> chromosomal aberrations assay - Syrian Hamster Embryo cells - Concentrations tested: 1-3-10-30 µM - Exposure time: 6-24-48h - Metabolic activation: without Equivalent or similar to OECD Guideline 473 (<i>In Vitro</i> Mammalian Chromosomal Aberration Test) No metabolic activation, no positive control mentioned and only 100 metaphases scored per experimental group (instead of 200 with replicate); Non-GLP Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Significant increase of aberrant metaphases starting from 3 µM (0.33 µg/ml) Slight but significant induction of aneuploidy in the near-diploid range at 30 µM (3.3 µg/ml) Cytotoxicity: inhibition of growth at doses greater than 10 µM (1.1 µg/ml) Vehicle controls valid: not examined; negative control valid: yes; positive controls valid: not examined</p>	<p>Tsutsui et al. (1997)</p>
<p><i>In vitro</i> chromosomal aberrations assay - Chinese Hamster Ovary (CHO) cells - Concentrations tested: 50 µg/mL (454 µM) - Exposure time: 3h - Metabolic activation: with and without - 200 metaphases scored for each sample Equivalent or similar to OECD Guideline 473 (<i>In Vitro</i> Mammalian Chromosomal Aberration Test) No data on cytotoxicity; Non-GLP Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Positive: Induction of chromatid breaks and exchanges at 50 µg/mL without metabolic activation Negative results with metabolic activation Vehicle controls valid: not examined; negative control valid: yes; positive controls valid: yes</p>	<p>Stich et al. 1981</p>
<p><i>In vitro</i> chromosomal aberrations assay - Chinese hamster lung fibroblasts (V79 cells)</p>	<p>Positive without metabolic activation</p>	<p>Clastogenic effect of catechol pH-dependent:</p>	<p>Do Ceu et al. 2003</p>

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<p>- Concentrations tested: 0-20-40-60-80 µM, pH values : 6.0, 7.4 and 8.0</p> <p>- Exposure time: 3h</p> <p>- Metabolic activation: with and without</p> <p>- 100 metaphases scored for each dose-level group (2 independent experiments)</p> <p>Equivalent or similar to OECD Guideline 473 (<i>In Vitro</i> Mammalian Chromosomal Aberration Test)</p> <p>Reliability 2: reliable with restrictions</p>		<p>Positive: Significant chromosomal aberrations at 40-60-80 µM, pH 7.4</p> <p>Positive: Significant chromosomal aberrations at 40-60 µM, pH8.0</p> <p>Negative: non-significant increase at any dose tested, pH 6.0</p> <p>Addition of S9 mix with SOD+ catalase lead to a reduction in the number of multi-aberrant cells</p> <p>Cytotoxicity was only observed at 80 µM at pH8.0</p> <p>Vehicle controls valid: not examined; negative control valid: yes; positive controls valid: yes</p>	
<p><i>In vitro</i> mammalian cell micronucleus test (chromosome aberration)</p> <ul style="list-style-type: none"> - Mouse lymphoma L5178Y cells - Concentrations tested: <p><u>Without S9, 0h:</u> 39.06, 19.53 and 9.77 µg/ml</p> <p><u>Without S9, 20h:</u> 19.53, 9.77 and 4.88 µg/ml</p> <p><u>With S9, 24h (liver S9-mix):</u> 156.25, 78.12, 39.06 and 19.53 µg/ml</p> <p><u>With S9, 24h (kidney S9-mix):</u> 156.25, 78.12, 39.06 and 19.53 µg/ml</p> <ul style="list-style-type: none"> - Metabolic Activation: with and without <p>Equivalent or similar to OECD Guideline 473 (<i>In vitro</i> Mammalian Chromosome Aberration Test)</p> <p>Micronucleus <i>in vitro</i> using micromethod assay; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive with or without Metabolic Activation</p>	<p><u>Without S9, 0h:</u> positive effect at the 3 concentrations tested with a clear dose-effect relationship</p> <p><u>Without S9, 20h:</u> positive effect at the highest and lowest concentrations tested</p> <p><u>With S9, 24h (liver S9-mix):</u> positive effect at the 4 concentrations tested</p> <p><u>With S9, 24h (kidney S9-mix):</u> positive effect at the 4 concentrations tested</p> <p>Cytotoxicity: yes (up to 19.53 µg/ml, depending of the assay) ;</p> <p>Vehicle controls valid: yes; negative controls valid: not examined; positive controls valid: yes</p>	<p>Study report n° FSR-IPL 060505-01 (2007)</p>
<p><i>In vitro</i> Micronucleus test,</p> <ul style="list-style-type: none"> - Human lymphocytes - Material purity: 99+% - Concentrations: 0- 0.5- 5.0-50-100-200-250 µM - Activation metabolic: Without <p>Only tested without metabolic activation system; only one donor of lymphocytes; Non-GLP</p> <p>Reliability 2: with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Genotoxicity: Significant dose-related increases of micronuclei formation (starting from 0.5 µM or 0.05 µg/ml)</p> <p>Cytotoxicity: Decrease of cell viability starting from 100 µM (11 µg/ml)</p> <p>Positive controls: yes; Negative controls: yes; vehicle controls: yes - Results valid</p>	<p>Yager et al. (1990)</p>
<i>In vitro</i> DNA damage in mammalian cells			
<p>DNA strand breaks/cross-links, mouse lymphoma cells <i>in vitro</i></p> <ul style="list-style-type: none"> - Mouse lymphoma L5178Y/TK +/- cells - Concentrations tested: 0- 0.5- 1.5- 5- 15 mM - Metabolic activation: with and without 	<p>Positive with and without metabolic activation</p>	<p><u>Without Metabolic Activation:</u> Positive results only at 1.5 mM (160 µg/ml)</p> <p>Cytotoxic effect at 5 and 15 mM without S9</p> <p><u>With Metabolic Activation:</u> Positive at doses higher than 0.5</p>	<p>Gardberg et al. (1988)</p>

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<p><u>Method:</u> Alkaline unwinding elution and chromatography on hydroxyapatite Not performed according to a standard guideline; Non-GLP Reliability 2 : reliable with restrictions</p>		<p>mM (55 µg/mL) with a clear dose-response relationship Cytotoxic effect at 15 mM with S9 Vehicle controls valid: yes; negative controls valid: not examined; positive controls valid: not examined</p>	
<p><i>In vitro</i> DNA damage Comet assay - Human Peripheral Blood Mononuclear Cells (PBMC) - Concentrations: 0 - 1.1 - 5.5 - 11 - 22 - 66 µg/mL (0 - 10 - 50 - 100 - 200 - 600 µM) - Exposure time: 2 hours - Metabolic Activation: Without Test not performed according to recognized guidelines; No details about positive controls; Non-GLP Reliability 2: with restriction</p>	<p>Positive in non relevant conditions (PBS)</p>	<p>Genotoxic effects observed at 200 and 600 µM in PBS Very low genotoxicity of catechol in media composed of RPMI+5% FCS No DNA damage observed with catechol in medium with 5% of serum Cell viability: No cytotoxic effects (viability>95% with blue dye exclusion method) Vehicle controls valid: not examined; negative control: yes; positive controls valid: not examined</p>	<p>Fabiani et al. (2001)</p>
<p>DNA content determined after alkaline treatment of the cells and neutralisation - Rat hepatocytes - Concentrations tested: 0 - 110 - 220 - 330 µg/mL (0 - 1000 - 2000 - 3000 µM) - Exposure time: 1 hour - Metabolic activation: without Not performed according to a standard guideline; only without activation metabolic; Non-GLP Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activity</p>	<p>Positive Increase of single strand breaks (SSB) with a dose response: threshold value=1000 µM Slight increase of SSB with the period of exposure (0, 20, 40 and 60 min) at 3000 µM Cotreatment with Ca²⁺-chelator Quin-2 AM decrease DNA damage Cytotoxicity: viability about 75% and no change after treatment at any dose tested Vehicle controls valid: not examined; negative controls valid: yes; positive controls valid: yes</p>	<p>Solveig Walles (1992)</p>
<p>DNA strand breaks/ Fluorimetric analysis of DNA unwinding - CHO-K1 cells - Concentrations tested: 0-50-100-150-200-250 µM - Exposure time: 45 min - Metabolic activation: without Not performed according to a standard guideline; only without activation metabolic and no details about controls; Non-GLP Reliability 3</p>	<p>Negative without metabolic activation</p>	<p>Catechol did not produce DNA strand breaks. Cytotoxicity: 50% of cell death is 100 µM Vehicle controls valid: not examined; negative control valid: not examined; positive controls valid: not examined</p>	<p>Sze et al. (1996)</p>
<p>DNA damage and repair/ Inhibition of synthesis - Mouse L5178YS cells - Concentrations tested: 0.11 to 110 µg/mL (0.001 mM to 1 mM including 10 concentrations)</p>	<p>Positive without metabolic activity</p>	<p>Strong DNA synthesis inhibition at 0.1 mM (65%) When doses increase, irreversible inhibition of DNA synthesis at >1 mM</p>	<p>Pellack-Walker et al. (1985)</p>

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<ul style="list-style-type: none"> - Exposure time: 30 min - Metabolic activation: without <p>Not performed according to a standard guideline; only without activation metabolic and no details about controls; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>		<p>Cytotoxicity: no effect on membrane integrity and protein synthesis as high as 1 mM (90% of cell viability)</p> <p>Vehicle controls valid: not examined; negative control valid: not examined; positive controls valid: yes</p>	
<p>DNA damage and repair/ Inhibition of synthesis</p> <ul style="list-style-type: none"> - Mouse L5178YS cells - Concentrations tested: 0.11 to 110 µg/mL (0.001 mM to 1 mM) - Exposure time: 30 min - Metabolic activation: without <p>Not performed according to a standard guideline; only without activation metabolic and no details about controls; Non-GLP</p> <p>Reliability 3</p>	<p>Negative</p>	<p>No increase of Single Strand Breaks as high as 1 mM</p> <p><u>Cytotoxicity:</u> 0.01mM is the highest nontoxic dose according to blue trypan dye exclusion 0.001mM is the highest nontoxic dose according to protein synthesis</p> <p>Vehicle controls valid: not examined; negative control valid: not examined; positive controls valid: not examined</p>	<p>Pellack-Walker et al. (1986)</p>
<p>Inhibition of DNA synthesis</p> <ul style="list-style-type: none"> - Mouse bone marrow cells - Concentrations tested: 0 - 0.66 - 1.321 - 1.982 - 2.642 µg/mL (0 - 6 - 12 - 18 - 24 µM) - Exposure time: 60 min - Metabolic activation: without <p>Not performed according to a standard guideline; only without activation metabolic and no details about controls; Non-GLP</p> <p>Reliability 3</p>	<p>Positive without metabolic activation</p>	<p>Positive: Inhibition of 52% of the nuclear synthetic activity at 24 µM; IC₅₀=23µM</p> <p><u>Cytotoxicity:</u> over 94% of cells viable at all concentration tested</p> <p>Vehicle controls valid: not examined; negative control valid: not examined; positive controls valid: not examined</p>	<p>Lee et al. (1989)</p>
<p>DNA damage and repair: GreenScreen assay (GSA)</p> <ul style="list-style-type: none"> - <i>Saccharomyces cerevisiae</i>: GENC01 and GENT01 strains - Concentrations tested: from 177 to 800 µg/mL - Metabolic activation: without <p>Induction of the RAD54 promoter due to DNA damage results in production of the extremely stable green fluorescent protein (GFP), which is fluorescent in the green spectrum when illuminated by blue light. Relative total growth assessed by comparing the extent of proliferation of treated cells with that of untreated cells.</p> <p>Not performed according to a standard guideline; only without activation metabolic; Non-GLP</p> <p>Reliability 2: reliable with restrictions</p>	<p>Positive without metabolic activation</p>	<p>Positive response in growth inhibition rate with strain GENC01 at 177 µg/mL</p> <p>Clear genotoxicity with GFP induction with strain GEN T01 at 599 µg/mL</p> <p>Vehicle controls valid: yes; negative control valid: yes; positive controls valid: yes</p>	<p>Cahill et al. (2004)</p>
<p><i>In vitro</i> DNA damage ³²P-labeled DNA fragment</p>	<p>Positive without</p>	<p><u>Catechol alone:</u> no genotoxic effects</p>	<p>Hirakawa et al. (2002)</p>

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<ul style="list-style-type: none"> - Human DNA fragments - Concentrations: 0-0.1-0.2-0.5-1-2-5-10-20 µM - With or without the addition of Cu²⁺ ions (20 µM) and/or NADH (100 µM) - Metabolic Activation: without <p>The test was not carried out according to the international recognized guidelines; no details about positive control; Non-GLP Reliability 2: with restrictions</p>	<p>metabolic activation</p>	<p><u>Catechol + Cu²⁺ ions:</u> small DNA damage at 10 and 20 µM</p> <p><u>Catechol + Cu²⁺ ions + NADH:</u> High level of DNA damage at 5 µM of catechol</p> <p>⇒ DNA damage resulted from base modification at guanine and thymine residues in addition to strand breakage induced by Cu²⁺ and H₂O₂</p> <p>Cytotoxicity: not determined Negative control: yes (valid); vehicle control: not examined; positive control: not examined</p>	
<p><i>In vitro</i>, 8-oxodG production</p> <ul style="list-style-type: none"> - Human Leukaemia cell line HL-60 and HP 100 - Concentration : 0 - 1.1 - 2.2 - 5.5 µg/mL (0 - 10 - 20 - 50 µM) - Exposure time: 120 min - Metabolic activation : without <p>Test was not carried out according to recognized international guidelines; No metabolic activation ; Cell viability not checked; No details about controls; Non-GLP Reliability 3</p>	<p>Positive without metabolic activation</p>	<p><u>HL-60 cells:</u> Increase of 8-oxodG content in a dose dependent manner (indicative of oxidative base damage); significant increase at 20 µM; and DNA ladder (associated with apoptosis) at 50 µM (4 hours treatment)</p> <p><u>HP-100 cells:</u> No increase of 8-oxodG content and no DNA ladder</p> <p>Cytotoxicity: not examined Vehicle controls valid: not examined; negative control: yes; positive controls valid: not examined</p>	<p>Oikawa et al. (2001)</p>

4.9.1.2. *In vivo* data

Studies selected for evaluating mutagenicity of pyrocatechol *in vivo* are mainly collected from CSR report and also from literature.

Micronucleus assays

Five *in vivo* studies were performed with a protocol similar to OECD Guideline 474 (“*In vivo* Mammalian Erythrocyte Micronucleus Test”), only two of them were considered of reliability of 2 according to Klimisch scale (Marrazzini et al., 1994; Ged-El-Karim et al., 1985).

- Oral route:

In the study of Gad-El-Karim et al. (1985), group of 3 to 5 males mice received by oral route 0 or 150 mg/kg bw of catechol. After 30 hours of dosing, animals were sacrificed and bone marrow from femur was used for the micronucleus test. The statistical analysis did not revealed difference between treated and negative controls animals in micronucleated PCE/NCE (PCE: Polychromatic Erythrocytes). This study revealed that pyrocatechol at 150 mg/kg bw was not considered to induce micronucleus.

Ciranni et al. (1988a) exposed mice (4 animals /group) to catechol at 40 mg/kg bw in a single time by oral route. The proportion of PCE in bone marrows smears was calculated by counting both NCE and PCE. Until 3000 PCE had been scored for the presence of micronuclei after 18, 24, 42 and 48h. During oral route experiment, catechol produced a significant increase of micronuclei at 24h with evident bone marrow depression.

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- Intraperitoneal route

In the study of Marrazzini et al. (1994), 3 males mice per group received single administration of catechol by intraperitoneal route at concentration of 0, 10, 20, 30 mg/kg bw. Catechol statistically induced micronuclei in a dose-dependent manner in bone marrow of femur. No variation of the PCEs/NCEs (NCE: Normochromatic Erythrocytes) ratio after 18h of exposure was observed.

Ciranni et al. (1988b) exposed mice (4 animals /group) to catechol at 40 mg/kg bw in a single time by intraperitoneal route. The proportion of PCE in bone marrows smears was calculated by counting both NCE and PCE. Until 3000 PCE had been scored for the presence of micronuclei after 18, 24, 42 and 48h. Significant genotoxic effects were observed at 24h after intraperitoneal injection and they were more pronounced than by oral route.

- Subcutaneous injection

In the study of Tunek et al. (1982) catechol was tested at 9 doses ranging between 5 and 42 mg/kg bw/d, injected once daily for 6 consecutive days. Cellularity did not significantly differ from control values at any dose and no increased frequency of micronuclei was observed (data not presented in the publication). As no toxicity was observed, they are no proof bone marrow exposure.

In vivo comet assays

Anin vivo comet assay study is available and showed negative results in stomach and positive results in duodenum cells. Even if catechol is hence devoid of genotoxic activity on the stomach cells from rat, it induced statistically significant increase in DNA strand breaks at non-lethal doses on rat duodenum cells after oral administration. The highest increase of median olive tail moment (OTM) was observed at the lowest dose tested of 100 mg/kg/day (x2) (Study report n°18255, 2008). Furthermore, the very low cell density observed at the two highest doses tested (200 and 400 mg/kg/day x2) indicated a probable cell lysis due to cytotoxicity and /or highly damaged cells with loss of information. Under these conditions, catechol was considered as a DNA strand breaks and/or alkali-labile sites inducer on duodenum cells.

Unscheduled DNA synthesis

Another *in vivo* study showed the genotoxicity of catechol on esophageal epithelial cells of rats exposed through drinking water and diet (Mirvish et al. 1985).

Catechol at concentration of 1-8 g/l significantly enhanced the uptake of tritium-labelled thymidine relative to untreated rats in a dose dependent manner, so catechol was able to stimulate the DNA synthesis. Cells from gut of rodents (duodenum and esophageal epithelial cells) appear sensitive to genotoxicity of catechol while no DNA damages were observed in stomach cells of rats (Furihata et al. 1989). In this study on stomach cells, results indicated an absence of induction of unscheduled DNA synthesis in the pyloric mucosa of the stomach of rats treated with catechol. In the same study, the administration of catechol at doses from 37.5 to 90 mg/kg bw did not induce DNA single strand scission in the pyloric mucosa of the stomach as determined by the alkaline elution method after 2 and 12 h. The fraction of DNA remaining on filter 2 and 12h after administration of catechol at the dose of 75 mg/kg remains in the same range than distilled water (0.8 to 1.0). The elution rate constant did not increase after administration of catechol suggesting that catechol did not induce single break scission of DNA in the pyloric mucosa.

Mouse spot test

In the study of Fahrig et al. (1984) a Mouse Spot Test equivalent or similar to OECD Guideline 484 was performed. Female mouse received i.p. injections of catechol at concentration of 22 mg/kg bw on days 9, 10 and 11 postconception with or without co-treatment with ENU. Catechol alone did not

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modified the apparition of color spots 2/216 (1%) compared to negative controls, so there was the same mutation rate in both conditions. When catechol was co-administered with ENU (ethylnitrosourea), the effects of ENU was slightly but not statistically significant enhanced. So catechol was considered as non-mutagen during *in vivo* exposure.

Other *in vivo* assays

Pyrocatechol was also considered not to have genotoxic effect on DNA repair system against E. coli K-12 uvr B/recA DNA repair in the Mice organs (Hellmer and Bolcsfoldi 1992).

Table 14: Summary of relevant *in vivo* mutagenicity studies for pyrocatechol

Test	Results	Remarks	Reference
<i>In vivo, Mouse spot test</i>			
Gene mutation test, mouse spot test - Mouse embryos (122 females treated) - Intraperitoneal injection - Dose: 22 mg/kg on days 9, 10, 11 post-conception with or without treatment of ethylnitrosourea (ENU), a carcinogen, at 30 mg/kg (IP) Equivalent or similar to OECD Guideline 484 (Genetic Toxicology: Mouse Spot test) Only one dose tested, Non-GLP Reliability 2: with restriction	Negative	<u>Without NRU:</u> mutation rate same as control mutation rate (2%) <u>With NRU:</u> Catechol enhances slightly the mutagenic effect of ENU Toxicity: no effects Vehicle controls valid: yes; negative control: yes; positive controls valid: yes	Fahrig (1984)

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<i>In vivo</i>, DNA damage assay			
<p>DNA damage and/or repair; Alkaline Comet assay</p> <ul style="list-style-type: none"> - Rat (Sprague-Dawley) male (5-10 weeks old); 5 animals/dose - Oral gavage - Doses tested: 100 mg/kg/day - 200 mg/kg/day - 400 mg/kg/day (nominal in water) - 2 treatments at 24 hours interval, one sampling time 3 to 6 hours after last treatment <p>Equivalent or similar to OECD guideline 489 (<i>in vivo</i> Comet assay on mammalian cells), GLP</p> <p>Reliability 2: reliable with restriction</p>	<p>Positive in duodenum cells</p>	<p><u>Genotoxicity:</u> Stomach cell: no significant increase of DNA strand breaks</p> <p>Duodenum cells: Significant increase in DNA strand breaks at 100 and 200 mg/kg/day (x2); highest increase at the lowest dose (100 mg/kg/day x2)</p> <p><u>Cytotoxicity:</u> yes, highly damaged cells at 200 and 400 mg/kg/day x2</p> <p><u>Toxicity:</u> yes Maximum Tolerated Dose= 400 mg/kg/day</p> <p>Vehicle controls valid: yes; positive controls valid: yes</p>	<p>Study report n° 18255 (2008)</p>
<p>DNA damage/repair, Unscheduled DNA synthesis ; Alkaline elution of DNA</p> <ul style="list-style-type: none"> - Rat male (344/DuCrj), 6-8 weeks old; 4-5 rats/group (pyloric mucosa of stomach) - Oral gavage - Single dose: 0-10-20-37.5-75-90 mg/kg bw in the presence of tritiated thymidine for UDS experiment - Exposure time: 2, 12, 24h <p>Equivalent or similar to OECD Guideline 486 (Unscheduled DNA Synthesis or UDS Test with Mammalian Liver Cells <i>in Vivo</i>)</p> <p>Cells examined are pyloric mucosa of stomach instead of liver cells (UDS); only male animals treated; no data about positive controls (UDS); Non-GLP</p> <p>Reliability 2: reliable with restriction</p>	<p>Negative</p>	<p><u>Unscheduled DNA synthesis (UDS)</u> Negative results: no induction of UDS</p> <p>Dose-dependent stimulation of replicative DNA synthesis</p> <p>Vehicle controls valid: yes; negative control: not examined; positive controls valid: not examined</p> <p><u>Alkaline elution assay</u> No increase of elution rate at 2h and 12h suggesting no increase of single break scission of DNA</p> <p>Vehicle controls valid: yes; negative control: yes; positive controls valid: yes</p>	<p>Furihata et al. (1989)</p>
<p>DNA damage/repair, Unscheduled DNA synthesis</p> <ul style="list-style-type: none"> - Rat Wistar male, 4-5 weeks, 4 animals/group, esophageal epithelial cells - Doses tested daily: 1, 2, 4, 8 g/L/day (drinking water) - Or 4 g/kg/day (diet semipurified)Exposure time: 7 days - Injection of tritium-labelled thymidine 1 hour before sacrifice into the esophageal epithelial <p>Not performed according to a standard guideline; Only male animals treated; no details about controls; Non-GLP; no data on food or water consumption</p> <p>Reliability 2: reliable with restriction</p>	<p>Positive</p>	<p><u>Drinking water:</u> catechol significantly enhanced the uptake of tritium-labelled thymidine incorporation into esophageal epithelial DNA relative to that in untreated rats in a dose dependent-manner.</p> <p><u>Diet:</u> catechol significantly enhanced the uptake of tritium-labelled thymidine relative to that in untreated rats. This effect is more consistent than in drinking water.</p> <p>Vehicle controls valid: not examined; negative control: yes; positive controls valid: not examined</p>	<p>Mirvish et al. (1985)</p>

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<p>DNA damage/repair; E. Coli K-12 DNA repair host-mediated assay</p> <ul style="list-style-type: none"> - Mouse NMRI (male), 7 animals/group <p>Bacteria strain: E. Coli K-12 343/636 and 343/591</p> <ul style="list-style-type: none"> - Oral route - Single dose: 200mg/kg - Exposure time: 2h <p>Not performed according to a standard guideline; Only one dose tested; only male mice treated; route of administration not specified (oral route?); no positive control; Non-GLP</p> <p>Reliability 3</p>	<p>Negative</p>	<p>No difference between treated and control for the ratio: number of colonies of DNA repair deficient strain/ number of colonies of DNA repair proficient strain in any organs of the mice (blood, liver, lungs, kidneys, testes)</p> <p>Vehicle controls valid: yes; negative control: not examined; positive controls valid: not examined</p>	<p>Hellmer and Bolcsfoldi (1992)</p>
<p><i>In vivo</i>, micronucleus assay</p>			
<p><i>In vivo</i> Micronucleus assay</p> <ul style="list-style-type: none"> - Mouse CD-1 male, 6-8 weeks old (3 animal/group) - Intraperitoneal - Single dose: 10-20-30 mg/kg bw (3 animals/dose) - Exposure time: 18h - At least 3000 PCEs (Polychromatic erythrocytes) <p>Equivalent or similar to OECD guideline 474 (Mammalian Erythrocyte Micronucleus Test)</p> <p>Low relevance of administration route; only male mouse treated; Non-GLP</p> <p>Reliability 2: with reliable restrictions</p>	<p>Positive</p>	<p>Genotoxicity: positive with significant induction of micronuclei in bone marrow cells, with a dose dependent</p> <p>No variations of PCEs/NCE</p> <p>Vehicle controls valid: not examined; negative control: yes; positive controls valid: not examined</p>	<p>Marrazzini et al. (1994)</p>
<p><i>In vivo</i> Micronucleus test</p> <ul style="list-style-type: none"> - Mouse CD-1 male, bone marrow cells from femur (3-5 animal/group) - Oral gavage - 1 single dose tested: 150 mg/kg - Exposure time: 30 hours <p>Equivalent or similar to OECD guideline 474 (Mammalian Erythrocyte Micronucleus Test)</p> <p>Only male mice treated ; only one dose tested; Non-GLP</p> <p>Reliability 2: with restrictions</p>	<p>Negative</p>	<p>Genotoxicity: negative (male)</p> <p>According to the authors, the dose of pyrocatechol was a very toxic single dose and convulsive seizures occur after administration.</p> <p>Vehicle controls valid: yes; negative control: not examined; positive controls valid: yes</p>	<p>Gad-El-Karim et al. 1985</p>

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<p><i>In vivo</i> Micronucleus test</p> <ul style="list-style-type: none"> - Male NMRI mice (polychromatic erythrocytes) <i>in vivo</i> (4 mice per group) - Concentration tested: 9 doses between 5 and 42 mg/kg bw - Subcutaneous injection: one per day for 6 consecutive days <p>Equivalent or similar to OECD guideline 474 (Mammalian Erythrocyte Micronucleus Test)</p> <p>Only male mice treated; Administration route not relevant; No details about controls; Non-GLP; very short reporting</p> <p>Reliability 3</p>	Negative	<p>No increase of frequency of micronucleus in polychromatic erythrocytes</p> <p>Cellularity did not differ from control values at any dose</p> <p>Vehicle controls valid: yes; negative control: not examined; positive controls valid: not examined</p>	<p>Tunek et al. (1982)</p>
<p><i>In vivo</i> Micronucleus test</p> <ul style="list-style-type: none"> - Pregnant female CD-1 mouse bone marrow and fetal liver - One single dose tested: 40 mg/kg - Oral route: gastric intubation - Time: 0-15-18-24-30-36-40h <p>Equivalent or similar to OECD guideline 474 (Mammalian Erythrocyte Micronucleus Test)</p> <p>Only pregnant females; only one dose tested; Only micronuclei in fetal liver cells presented; Non-GLP</p> <p>Reliability 3</p>	Positive	<p>Pregnant female: Significant increase of micronuclei in the polychromatic erythrocytes from bone marrow after 24h, 36h and 48h.</p> <p>Fetal liver: Induction of micronuclei (1-3 fold over the control values), only significant at 18h</p> <p>Toxicity observed in fetal liver cells: Reduction of the PCE/PNE ratio (reduction between 30 and 60% compared to control) after 9 and 12h.</p> <p>Vehicle controls valid: not examined; negative control valid: yes; positive controls valid: not examined</p>	<p>Ciranni et al. (1988a)</p>
<p><i>In vivo</i> Micronucleus test</p> <ul style="list-style-type: none"> - Male CD-1 mouse (6-8 weeks; 4 animals per group), bone marrow smears - Single dose tested: 40 mg/kg - Oral route or intraperitoneal - Exposure time: 18-24-42-48h <p>Equivalent or similar to OECD guideline 474 (Mammalian Erythrocyte Micronucleus Test)</p> <p>Only one dose tested; no details about controls; Non-GLP</p> <p>Reliability 3</p>	Positive	<p><u>Oral route</u>: significant increase of micronuclei in the polychromatic erythrocytes only at 24h with evident bone marrow depression.</p> <p><u>Intraperitoneal</u>: significant increase of micronuclei in the polychromatic erythrocytes from bone marrow only at 24h and evident bone marrow depression starting from 18h after treatment.</p> <p>Vehicle controls valid: not examined; negative control: not examined; positive controls valid: not examined</p>	<p>Ciranni et al. (1988b)</p>

4.9.2. Human information

No data available

4.9.3. Other relevant information

Three other *in vitro* studies were performed to evaluate the genotoxicity of catechol using topoisomerase inhibition. These 3 studies are considered of reliability of 2 according to Klimisch scale. Results from topoisomerase assay I indicated no inhibition effect of catechol observed at the only high dose tested 1000 µM. However, a significant inhibition effect was only observed at 1000 µM in topoisomerase assay II Chen and Eastmond (1995). Another study showed that catechol required bioactivation by peroxidase (presence of hydrogen peroxide) to inhibit topoisomerase II at 10 µM and 100 µM (Frantz et al. 1996). However, catechol had no effect on inhibition of topoisomerase II at concentrations up to 300 µM even though inhibition of peroxidase activation was observed with catechol at 30 µM (Baker et al. 2001).

In conclusion, the inhibition effect of catechol was only observed on Topoisomerase II and in specific *in vitro* conditions.

4.9.4. Summary and discussion of mutagenicity

Mutagenicity effects of pyrocatechol in the different *in vitro* models indicated positive effects mainly on mammalian cells without metabolic activation system. High mutagenic frequency was observed at concentrations of pyrocatechol below 10 µg/ml. Mutagenic and cytotoxic effects may be induced by independent chemical species with probably superoxide anion-mediated for mutagenicity. Only one study on bacteria (TA102) showed mutagenicity of pyrocatechol suggesting oxidative properties (Study report n° FSR-IPL 060904-01 2007). During *in vitro* experiment, pyrocatechol is also able to induce genotoxic effects on mammal's and human cells with or without metabolic activation: chromatid breaks, chromatid exchange and micronucleus production. Genotoxic effect of pyrocatechol seems to be dose-dependent and link to specific mechanism of oxidative property. It had not been clearly demonstrated whether or not this genotoxic effect had a threshold.

Results collected from *in vivo* experiments revealed that pyrocatechol is able to induce the production of single strand breaks on duodenum cells and esophageal epithelial cells of rodents after oral treatment (Study report n° 18255 2008; Mirvish et al. 1985). However, no genotoxic effects have been observed on stomach cells of rodent (Study report n° 18255 2008, Furihata et al. 1989).

Pyrocatechol induced micronuclei formation on erythrocytes after oral and intraperitoneal administration in a dose-dependent manner (Marrazzini et al. 1994; Ciranni et al. 1988a, 1988b). However, contradictory results have been noticed by assessing the micronuclei formation on mouse exposed by oral route to pyrocatechol. On one hand, one author didn't observe any genotoxic effects of pyrocatechol on mouse exposed to 150 mg/kg after 30 hours (Gad-El-Karim et al. 1985); the dose was stated to be very toxic in the publication. On the other hand, a significant increase of micronuclei in the PCE was measured on male and female mice exposed to 40 mg/kg of pyrocatechol after 24 hours by oral route (Ciranni et al. 1988a, 1988b). This study was reliability 3 because it was performed without any positive control, while the first one (Gad-El-Karim et al. 1985) was reliability 2 and validated by a vehicle and a positive control. Nevertheless, a significant induction of micronuclei was measured on mice exposed to 10-30 mg/kg bw of pyrocatechol per i.p. during 18h (Marrazzini et al. 1994). By summarizing the overall studies performed during *in vivo* experiments, 3/5 positive micronucleus studies and a positive screening comet assay in duodenum cells suggest a potential genotoxic effect of pyrocatechol.

4.9.5. Comparison with criteria

According to CLP classification of a substance as mutagen **Category 1B** is based on the following criteria.

- Positive result (s) from *in vivo* heritable germ cell mutagenicity test in a mammals; or

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- Positive result (s) for *in vivo* somatic cell mutagenicity/genotoxicity tests in germ cells *in vivo*, or by demonstrating the ability of the substance or its metabolite(s) to interact with the genetic material of germ cells; or
- Positive result from tests showing mutagenic effects in the germ cells of humans, without demonstration of transmission to progeny; for example, an increase in the frequency of aneuploidy in sperm cell of exposed people.

Classification into **Category 2** according to CLP is required for substances which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans based on:

- Positive evidence obtained from experiments in mammals and/or in some cases from *in vitro* experiments, obtained from:
 - Somatic cell mutagenicity tests *in vivo*, in mammals.
 - Other *in vivo* somatic cell genotoxicity tests which are supported by positive results from *in vitro* mutagenicity assays.

4.9.6. Conclusions on classification and labelling

No genotoxic effects of pyrocatechol have been observed on germinal cells, so pyrocatechol can't be classified in Category 1B mutagen.

There is no ADME data in the registration dossier showing availability of Pyrocatechol in reproductive tissues.

The few available data on the registration dossier and a rapid search do not provide evidence of effects of pyrocatechol on reproductive organs.

All *in vitro* studies available indicated a genotoxic effect of pyrocatechol on different animals and human somatic cells lines studied. However, *in vivo* experiment showed contradictory results about the potential genotoxicity of pyrocatechol. Clear evidences of genotoxicity in rat by oral route on duodenum (Comet) and esophageal tissue (UDS) have been shown (Study report n° 18255 et al. 2008; Mirvish et al. 1985). A study has shown the ability of pyrocatechol to induce clastogenic effect after an intraperitoneal injection on mice: a significant induction of micronuclei in bone marrow cells with a dose dependant was observed (Marrazzini et al. 1994). Two others supportive experiments confirmed the ability of pyrocatechol to induce micronuclei formation in bone marrow cells by I.P. and oral routes, although some contradictory results were observed without clear explanation .

On this basis, according to classification criteria of EC regulation 1272/2008 the pyrocatechol should be classified in **Category 2 mutagen** (H341: Suspected of causing genetic defects).

RAC evaluation of germ cell mutagenicity

Summary of the Dossier Submitter's proposal

No human studies on possible mutagenic effects of pyrocatechol were available.

The DS, in order to evaluate the mutagenicity of pyrocatechol, selected *in vivo* and *in vitro* studies mainly from the Chemical Safety Report (CSR) of the registration dossier and also from the literature. A considerable number of papers (more than 65) were included in the registration dossier for pyrocatechol. Most of the studies were reported to be of reliability 2

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(Klimisch) according to the CSR and only few studies were of reliability 3 (n=10) because of the lack of details about controls.

In vitro gene mutations assays on bacterial and mammalian cells (Study report n° FSR-IPL 060904-01, 2007; Martinez *et al.*, 2000; Tsutsui *et al.*, 1997; Mc Gregor *et al.*, 1988, etc.), *in vitro* mammalian chromosome aberration tests (Tsutsui *et al.*, 1997; Do Ceu *et al.*, 2003 etc.) and sister chromatid exchange assays (Tsutsui *et al.*, 1997; Morimoto 1983, etc.), along with various DNA damage tests (Fabiani *et al.*, 2001; Pellack-Walker *et al.*, 1985; Lee *et al.*, 1989, etc.) provided positive results, indicating mutagenic effects of pyrocatechol in the different *in vitro* models. Genotoxic effects of pyrocatechol on germinal cells have not been studied.

From the overall studies performed during *in vivo* experiments, 3/5 positive micronucleus studies (Marrazzini *et al.*, 1994; Ciranni *et al.*, 1988a; Ciranni *et al.*, 1988b) and a positive screening comet assay in duodenum cells (Study report n° 18255, 2008) suggested that pyrocatechol had potential genotoxic effects, which is consisted with the *in vitro* positive results summarized above.

Furthermore, there were no Absorption, Distribution, Metabolism & Excretion (ADME) data in the registration dossier showing availability of pyrocatechol in reproductive tissues or other evidence of effects of pyrocatechol on reproductive organs.

Based on all the above, the DS proposed to classify pyrocatechol as a germ cell mutagen in Category 2 (H341: Suspected of causing genetic defects).

Comments received during public consultation

During PC, two comments from MSCAs were received, both supporting classification of pyrocatechol as Muta. 2. In addition, comments from industry, including all REACH registrants, supported the proposed classification.

Assessment and comparison with the classification criteria

Classification of pyrocatechol was based on the *in vivo* data with supporting evidence from *in vitro* data.

In vivo studies

In total 10 studies are discussed as follows:

Species	Method	Administration	Target organ/ tissue/ cell	Result	Reference
Mouse spot test					
Mouse embryos	Equivalent or similar to OECD TG 484 (reliability 2)	Intraperitoneal injection 22 mg/kg bw on days 9, 10, 11	Developing embryos' melanoblasts	Negative	Fahrig, 1984
DNA damage assays					
Sprague-Dawley male rat	Equivalent or similar to OECD TG 489 (<i>in vivo</i> alkaline Comet assay), GLP study (reliability 2)	Oral gavage 100, 200, 400 mg/kg bw /day	Duodenum cells	Positive	Study report n° 18255, 2008
Rat male (344/DuCrj)	Equivalent or similar to OECD TG 486 (unscheduled DNA synthesis or UDS test with Mammalian Liver Cells <i>in vivo</i>), non GLP study (reliability 2)	Oral gavage Single dose 0, 10, 20, 37.5, 75, 90 mg/kg bw for 2, 12, 24 hours	Pyloric mucosa of stomach	Negative	Furihata <i>et al.</i> , 1989

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Rat Wistar male	Not performed according to standard guideline (DNA damage/repair, unscheduled DNA synthesis, injection of tritium-labelled thymidine), non GLP study (reliability 2)	Oral 1, 2, 4, 8 g/L/day	Esophageal epithelial cells	Positive	Mirvish <i>et al.</i> , 1985
Mouse NMRI male	Not performed according to standard guideline (DNA damage/repair, <i>E. Coli</i> K-12 DNA repair host-mediated test), non GLP study (reliability 3)	Oral Single dose: 200 mg/ kg bw	Blood, liver, lungs, kidneys, testes	Negative	Hellmer & Bolcsfoldi, 1992
Micronucleus assay					
Mouse CD-1 male	Equivalent or similar to OECD TG 474 (reliability 2)	Intraperitoneal Single dose 10, 20, 30 mg/kg bw	Bone marrow cells	Positive	Marrazzini <i>et al.</i> , 1994
Mouse CD-1 male	Equivalent or similar to OECD TG 474 (reliability 2)	Oral gavage Single dose 150 mg/kg (high dose led to convulsive seizures)	Polychromatic erythrocytes	Negative	Gad-El-Karim <i>et al.</i> , 1985
Mouse NMRI male	Equivalent or similar to OECD TG 474 (reliability 3)	Subcutaneous injection for 6 days (1 per day) 5-42 mg/kg bw	Polychromatic erythrocytes	Negative	Tunek <i>et al.</i> , 1982
Mouse CD-1 pregnant female	Equivalent or similar to OECD TG 474 (reliability 3)	Oral (gastric intubation) 40 mg/kg bw	Polychromatic erythrocytes, foetal liver	Positive	Ciranni <i>et al.</i> , 1988a
Mouse CD-1 male	Equivalent or similar to OECD TG 474 (reliability 3)	Oral and intraperitoneal 40 mg/kg bw	Polychromatic erythrocytes	Positive	Ciranni <i>et al.</i> , 1988b

Positive results were observed in two species (rat, mouse) and in both sexes in the mouse, both after oral and intraperitoneal administration. Mutations were only assessed in the mouse, while the positive results in rats were in genotoxicity studies.

Overall, positive results were reported from 3/5 micronucleus studies. Furthermore, a positive screening comet assay in duodenum cells suggested a potential genotoxic effect of pyrocatechol. These results were supported by the observed enhanced uptake of tritium-labelled thymidine into the DNA, indicating unscheduled DNA synthesis and altered DNA damage/repair, which was reported in the Mirvish *et al.* (1985) study on oesophageal cancer.

Results collected from *in vivo* experiments revealed that pyrocatechol is able to induce the production of single strand breaks (DNA damage) in cells of the duodenum and oesophageal epithelial cells of rodents after oral treatment (Study report n° 18255, 2008; Mirvish *et al.*, 1985).

Pyrocatechol induced micronucleus formation in a dose-dependent manner after oral and intraperitoneal administration (Marrazzini *et al.*, 1994; Ciranni *et al.*, 1988a, 1988b).

A significant increase in micronuclei in the PCE was measured on male and female mice exposed to 40 mg/kg bw of pyrocatechol after 24 hours by the oral route (Ciranni *et al.*, 1988a, 1988b). This study was of (Klimisch) reliability 3 because it was performed without any positive control. Nevertheless, positive controls are less important in a positive study. A significant induction of micronuclei was also measured 18h after mice were exposed to 10-30 mg/kg bw pyrocatechol intraperitoneally (Marrazzini *et al.*, 1994).

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In vitro studies

Mammalian cells

In order to evaluate the mutagenic properties of pyrocatechol, 9 tests exploring the lactogenic effects on mammalian cells were examined, all providing positive results (chromatid breaks, chromatid exchange and micronucleus production) without metabolic activation: 1 micronucleus test (Yager *et al.*, 1990), 4 sister chromatid exchange assays equivalent or similar to OECD TG 479 (Tsutsui *et al.*, 1997, Erexson *et al.*, 1985, Morimoto & Wolff 1980, Morimoto 1983) and 4 chromosomal aberration assays equivalent or similar to the OECD TG 473 (Tsutsui *et al.*, 1997, Stich *et al.*, 1981, Do Cey *et al.*, 2003, Study report n° FSR-IPL 060904-01, 2007). The majority of the studies (78%) were of (Klimisch) reliability 2.

The following cell lines were used:

Cell line	Source
Human lymphocytes	human
Human T-lymphocytes	human
Syrian Hamster Embryo (SHE) Cells	rodent
Chinese Hamster Ovary (CHO)	rodent
Chinese hamster lung fibroblasts (V79 cells)	rodent
Mouse lymphoma L5178Y cells	rodent

In the micronucleus test, human lymphocytes were treated with a range of catechol concentrations (from 0.5 to 250 µM) without a metabolic activation system (Yager *et al.*, 1990). Statistically significant increases in micronucleated cells were observed starting from 0.5 µM and a decrease in cell viability was measured starting from 100 µM. A significant concentration related increase in kinetochore-positive micronucleated cells was apparent, suggesting that catechol was a likely aneuploidy-inducing agents in human lymphocytes.

Pyrocatechol was tested in the concentration range of 0-1000 µg/mL in the sister chromatid exchange (SCE) assays. The lowest dose causing a significant increase of SCE was 5 µg/mL, while cytotoxicity expressed as inhibition of growth was observed even at 10 µg/mL.

In the chromosomal aberration assays pyrocatechol was tested at doses of 0.11 µg/mL to 156.25 µg/mL. Significant increases in aberrant metaphases starting from 0.33 µg/mL and slight but significant induction of aneuploidy in the near-diploid range at 3.3 µg/mL were observed, hence this concentration was considered the lowest effective dose (Tsutsui *et al.*, 1997). Inhibition of growth was noted at 1.1 µg/mL (Tsutsui *et al.*, 1997). Furthermore, results showed that the clastogenic effect of catechol was pH dependent (Do Ceu *et al.*, 2003), while a clear dose-response relationship was observed in the Study report n° FSR-IPL 060904-01(2007).

Three gene mutation studies of pyrocatechol on SHE cells and L5178Y mouse lymphoma cells, conducted similarly or equivalently to the OECD TG 473 (Tsutsui *et al.*, 1997, Mc Gregor *et al.*, 1988; Wangenheim & Bolcsfoldi, 1988), demonstrated the mutagenic activity of the substance. More specifically, pyrocatechol induced gene mutations at the two loci in SHE cells without metabolic activation, while an increase in the mutation frequency (but in a non-dose dependent manner) in the L5178Y mouse lymphoma cells was also reported.

Supportive data on DNA damage in mammalian cells, including single/double strand break DNA, alkali-labile sites, unscheduled DNA synthesis, inhibition of DNA synthesis or inhibition of the DNA repair system and oxidative base damage and apoptosis were also available. The majority of the tests were not performed according to a standard guideline. Both human cell lines (human peripheral blood mononuclear cells – PBMCs, Fabiani, 2001; human leukemic cell line HL-60, Oikawa *et al.*, 2001) and rodent cell lines were used (mouse lymphoma

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L5178YS, Pellack-Walker *et al.*, 1985; rat hepatocytes, Solveig Walles, 1992; mouse bone marrow cells, Lee *et al.*, 1989).

Bacteria

Of the *in vitro* gene mutation studies performed in bacteria (i.e. bacterial reverse mutation tests similar to OECD TG 471), 2 were positive (Study report n° FSR-IPL 060904-01, 2007; Martinez *et al.*, 2000). In a screening micro method assay of the Ames test performed without repetition, positive results were observed with *Salmonella typhimurium* TA 102 without S9-mix and with kidney S9-mix, but not with liver S9-mix (Study report n° FSR-IPL 060904-01, 2007). The positive response with strain TA 102 was probably due to a substitution of AT to GC by an oxidative mechanism. Positive results were also obtained with *Escherichia coli* WP2 uvrA/pKM101 strain IC203 without S9, but not with S9 (Martinez, 2000). Strain IC203, deficient in OxyR (its oxyR+ parent is WP2 uvrAr/pKM101 denoted IC188, which is the common strain used in the guideline Ames study), is more sensitive to mutation induced by oxidative damage. In this study, a negative response was observed with WP2 uvrA/pKM101 strain IC188 (with and without S9-mix).

Mutagenic and cytotoxic effects maybe induced by independent chemical species with probably superoxide anion-mediated mutagenicity. Only one study on bacteria (TA102) showed mutagenicity of pyrocatechol suggesting oxidative properties (Study report n° FSR-IPL 060904-01, 2007). The genotoxic effect of pyrocatechol seems to be dose-dependent and linked to its specific oxidative properties. It had not been clearly demonstrated whether or not this genotoxic effect had a threshold.

In conclusion, there are no human data in the literature, and based on the animal data available, there is no concrete evidence that pyrocatechol is mutagenic to germ cells or that it distributes to the reproductive tissues. It could be argued, that the positive *in vivo* comet assay could support the hypothesis that pyrocatechol has the potential to induce gene mutations *in vivo*, since the comet assay recognises DNA damage that could lead to gene mutations. But the lack of relevant data to assess mutagenicity of germ cells prevails. Therefore, the criteria for classify a substance as a germ cell mutagen in Category 1B according to table 3.5.1 of Annex I of CLP and § 3.5.2.4 of the CLP Guidance, are **not met**.

All *in vitro* studies on mutagenic effects in mammalian cells were positive along with 2 mutagenicity studies performed in bacteria. A number of *in vivo* studies confirmed that the mutagenic potential observed *in vitro* can also be expressed *in vivo*. Three *in vivo* micronucleus studies were positive (one of reliability 2, two of reliability 3). The available *in vivo* comet assay was positive in duodenum cells after oral administration. Overall, these results support that pyrocatechol has the potential to induce chromosome aberrations *in vivo*.

On this basis, according to the classification criteria of the CLP Regulation summarized in table 3.5.1 of Annex I of CLP, RAC concludes that pyrocatechol should be classified as **Muta. 2 (H341: Suspected of causing genetic defects)**.

4.10. Carcinogenicity

4.10.1. Non-human information

4.10.1.1. Carcinogenicity: oral

The carcinogenic and co-carcinogenic effect of pyrocatechol in animals was evaluated by 38 studies of reliability 2 (according to Klimisch scale) including 8 carcinogenicity studies. Only validity 2 studies were selected and reported in table 18 of the CLH report. They were performed on rodents by oral feeding of pyrocatechol. The objectives of these studies were mainly to assess effects of pyrocatechol on specific organs such as stomach. According to data available, there is no study investigating effects of pyrocatechol on all organs from the whole body of rodents.

Carcinogenicity studies

- In rats

The potential reversibility of glandular stomach lesions induced by catechol was studied by Hirose et al. (1992). Male F344 rats were treated continuously with 0.8% catechol in the diet for 12, 24, 48, 72, or 96 weeks followed by a return to basal diet for 84, 72, 48, 24, and 0 weeks, respectively. Incidences of submucosal hyperplasia, adenomas and adenocarcinomas, average number of tumours per rat, and the size of tumours in glandular stomach of rats treated with 0.8% of catechol from 12 to 96 weeks increased time dependently. After cessation of catechol treatment, the average number of tumours per rat tended to slightly decrease although the size of tumours tended to increase. Labelling indices in both adenoma and non-tumorous areas decreased significantly after cessation of catechol treatment. Results indicate that neoplastic lesions (adenoma and hyperplasia) from short time exposure to catechol (12 to 24 weeks) have the potential to regress after a long recovery period (basal diet) of 72 or 84 weeks (see table below).

Table 15: Histopathological findings in the glandular stomach from the carcinogenicity study with recovery period (Hirose et al. 1992)

Table 1 Histopathological findings in the glandular stomach: incidence data

Group	Treatment (wk)		No. of rats	No. of rats with (%)		
	Catechol	Basal diet		Hyperplasia	Adenoma	Adenocarcinoma
1	12	0	10	9 (90)	2 (20)	0
2	12	84	17	6 (35.3)*	2 (11.8)	0
3	24	0	10	10 (100)	10 (100)	0
4	24	72	16	10 (62.5)	12 (75)	1 (6.3)
5	48	0	10	10 (100)	10 (100)	1 (10)
6	48	48	14	14 (100)	14 (100)	3 (21.4)
7	72	0	10	10 (100)	10 (100)	4 (40)
8	72	24	18	18 (100)	18 (100)	9 (50)
9	96	0	15	15 (100)	15 (100)	11 (73.3)
14	0	96	12	0	0	0

* Significantly different at $P < 0.02$ versus group 1.

Biological changes of rat's glandular stomach after catechol treatment were also studied at short (7 days) and mid-long term (24 weeks) time of exposure (Hirose et al. 1999). Males' rats (5 per group) were treated at different concentrations of catechol: 0.01, 0.1, 0.5 or 1% in diet for 7 days and sacrificed after 12h, 1, 2, 3 and 7 days; and 0.8% for 24 weeks. Short time exposure (7 days) showed that catechol induced first apoptosis, inflammation and erosion or ulceration in pyloric region. Catechol induced toxicity and continuous strong cell-proliferation responsible of glandular stomach carcinogenesis. This effect had a threshold of 0.01%. Experiment at 24 weeks confirmed these observations with apparition of polyploid hyperplasia and adenoma at the end of the treatment.

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Carcinogenicity of catechol on stomach was also investigated on male and female F344 rats (Hirose et al. 1993a). Rats (30/group) were treated with 0.8% (around 480 mg/kg bw/d) of catechol in powdered diet continuously for 104 weeks. At necropsy, neoplastic lesions were mainly observed in glandular stomach of animals (both sexes). Adenomas and submucosal hyperplasia were found in all rats. Moreover, 15/28 (54%) of male rats and 12/28 (43%) female rats had well differentiated adenocarcinomas. Although there was no significant increase of papilloma in the forestomach epithelium, incidences of squamous cell hyperplasia were significantly increased in forestomach of rats from both sexes. This study showed that catechol exerts clearly a carcinogenic activity in rat glandular stomach epithelium.

Carcinogenicity of catechol was studied by using different strains of rats (Tanaka et al. 1995): Wistar, Lewis, Sprague Dawley or WKY. They were treated with 0.8% of catechol in diet (equivalent to around 320 mg/kg bw/d using default standard food intake value for rat of 40 g/kg bw/d), for 104 weeks. Neoplastic lesions were observed in forestomach with hyperplasia (Wistar, WKY and SD) and papilloma only in SD strain. Glandular stomach appears more sensitive to catechol effect with a clear strain differences in the induction of adenocarcinomas was noticed. Even though submucosal hyperplasia, adenoma and ulceration were observed in glandular stomach of all rats' strains, only 3 strains (Wistar, Lewis, Sprague Dawley) showed adenocarcinomas in their glandular stomach.

Another carcinogenicity study on male rats (104-weeks of exposure to 0.16%) indicated a significant decrease of body weight (-13%) and a slight increase (3%) of forestomach papillomas in catechol treated group as compared to the basal diet group (not statistically different) (Hirose et al. 1997). However, this study confirmed the sensitivity of glandular stomach to catechol as a significant increase of incidence of submucosal hyperplasia and adenoma was measured.

In the study of Hagiwara (2001), the potential carcinogenesis of catechol was investigated on glandular stomach of male F344 rats during 104 weeks. Strong retardation of body weight (-17%) was observed in the 0.8% group, but no adverse effects were found in terms of survival. Results demonstrated that dietary levels of 0.4% and 0.8% of catechol (141 and 318 mg/kg bw/d average intake, respectively) long-term exposure (104 weeks) induced not only an increase of submucosal hyperplasias and adenomas but also a low number of adenocarcinomas and sarcomas were observed (non-significant) in the pyloric glands, while 0.1 and 0.2% groups showed only benign proliferative lesions (submucosal hyperplasia and adenoma), all accompanied by a significant increase of serum gastrin levels.

- In mice

Carcinogenicity of catechol was also studied on mice in this study (Hirose et al. 1993a). Mice (30 per group) were fed with diet containing 0.8% (ca. 960 mg/kg bw/d) of catechol during 96 weeks. The authors observed a slight reduction of survival rate, a significant diminution of body weight (males: -22%; females: -41%) and a significant increase in relative liver body weight. Main lesions were observed in stomach with significant increase of squamous cell hyperplasia in forestomach and glandular stomach. Incidence of adenomas was significantly increased in glandular stomach but no adenocarcinoma was observed in glandular stomach or forestomach. Mice appear less sensitive than rats to carcinogenicity of catechol (Hirose et al. 1993a).

Initiation-Promotion models

Tumour promotion was studied in rats pre-exposed to a single intragastrin dose of 150 mg/kg bw/d of N-methyl-N'-nitro-N-nitrosoguanidine (MNNG), then rats received or not 1.5% of catechol diet for 4 weeks and 0.8% for 47 weeks (Hirose et al. 1987, rapid communication). 10-20 male F344

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rats/group were treated with catechol alone or basal diet. A significant increase of incidence of squamous cell carcinoma was measured in the forestomach of rats exposed to MNNG and catechol. A slight but non-significant hyperplasia and papillomas were also observed in catechol and MNNG + catechol groups. Glandular stomach appears very sensitive to catechol with a significant increase of incidence of adenomatous hyperplasia and adenocarcinoma in MNNG + catechol group. Rats treated with catechol showed only an increase of incidence of adenomatous hyperplasia. These results underline the fact that catechol is a potential carcinogen for glandular stomach.

A similar study on tumour promotion study on rats was performed by Wada (1988). Incidence of hyperplasia, papillomas and squamous cell carcinomas were strongly increased in the forestomach of rats treated with MNNG and catechol (0.8%) after 52 weeks of treatment. Catechol alone significantly increased only incidence of hyperplasia (mild to severe) in the forestomach of rats compared to basal diet. Lesions of the glandular stomach were predominantly developed in the pyloric region: all rats treated with MNNG and catechol showed submucosal hyperplasia and adenoma. Adenocarcinomas were observed in glandular stomach of 73% of rats treated with MNNG and catechol. Catechol alone significantly increased incidence of adenoma and submucosal hyperplasia in the glandular stomach of rats. Adenocarcinomas were observed in only one rat (7%). This study confirmed the potential carcinogenesis of catechol on stomach, especially glandular stomach.

Yamagushi et al. (1989) showed a significant increase of incidence of carcinoma in esophagus, a significant increase of incidence of preneoplastic hyperplasia and papilloma in tongue of rats exposed to MNAN (methyl-N-amyl nitrosamine) and catechol (0.8%). A significant decrease of alveolar hyperplasia was observed in lung and no effect on nasal cavity was noticed.

Tumour promotion study of catechol was also studied on urinary bladder (Kurata et al. 1990). Incidence of papillomas and carcinoma in bladder were slightly increased when rat received BBN + catechol during 32 weeks compared to rat that received only BBN (4 weeks pre-treatment) or only catechol (0.8% of catechol).

One tumour promotion study (Hasegawa et al. 1990) showed that treatment with catechol (0.8% for 30 weeks) alone had no effect (carcinoma or adenoma) on kidneys, bladder and thyroid of rats. Catechol induced submucosal and adenomatous hyperplasia in pyloric region of glandular stomach. Anti-carcinogenic effects of catechol with DHPN were observed in lung and thyroid: a significant decrease of number and areas of lung neoplastic lesions and a low decrease of carcinoma in thyroid (non-significant). This study revealed that treatment with DHPN and catechol seemed to decrease slightly the incidence of carcinogenic effect (thyroid and lung) observed with DHPN alone.

In the tumour promotion study of Fukushima (1991), rats were feed for 16 weeks with or without 0.8% of catechol after a pre-treatment of 4 weeks to DEN, MNU and DHPN. Catechol decreased significantly the number of GST-P positive foci. DMD+Catechol treatment induced significantly hyperplasia and papilloma on forestomach and submucosal hyperplasia on glandular stomach. Catechol had no effect on urinary bladder, thyroid, and esophagus.

Maruyama et al. (1991), studied female Syrian golden hamsters. They observed a significant decrease of body weight and liver weight of female hamster treated to catechol (0.75 to 1.5% by oral feed) for 20 weeks with pre-treatment to BOP. No neoplastic lesions were evident in female hamsters administered catechol after saline or BOP pre-treatment. The numbers of atypical pancreatic hyperplasias and adenocarcinomas in hamsters treated with 0.75% catechol after BOP were significantly decreased when compared to control group (BOP). Liver lesions were not found in hamsters administered with catechol after saline. A slight decrease of hepatocellular carcinomas was noticed in the group treated with 1.5% catechol after BOP compared to BOP control group. According

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to the authors, results indicate that catechol exerted a weak inhibitory effect on pancreatic carcinogenesis after initiation of female hamsters with BOP at low dose of 0.75%.

Another tumour promotion study exposed rats to a lower dose of catechol (0.2%) than previous studies during 36 weeks (after MNNG pre-treatment) (Hirose et al. 1991). These authors noticed no significant effect on forestomach with only a significant increase of incidence of hyperplasia and adenomas in glandular stomach. No adenocarcinomas were observed in forestomach or glandular stomach of rats treated with catechol (0.8%).

Hasegawa et al. (1992) exposed F344 male rats to 0.2 and 0.8% in diet with catechol for 6 weeks only. Rats were pre-treated by i.p. with 200 mg/kg bw/d of diethylnitrosamine (DEN) during 2 weeks. The body weight was decreased (-20%) in group treated at 0.8% catechol. Rats pre-treated with DEN and treated with catechol at 0.8% showed a significant tumour inhibition (medium-term bioassay method using preneoplastic glutathione S-transferase-positive liver cell foci as the endpoint marker lesion).

A similar study was performed by Kajimura (1992) where rats (15 per group) were exposed to catechol at 0.8% for 16 weeks after a DMD pre-treatment. Strong hyperplasia and papillomas in forestomach and submucosal hyperplasia in glandular stomach were observed after DMD pre-treatment with catechol. Slight cell hyperplasia and papilloma were observed in urinary bladder, and low incidence of alveolar/bronchiolar adenoma in lung of rats pre-treated with DMD and catechol.

In the study of tumour promotion of Hirose et al. (1993b), rats were treated with catechol in diet at 0.8% (ca. 480 mg/kg bw/day) for 28 weeks (including 4 weeks of multiple initiation periods with DEN, DHPN and NaNO₂). A significant decrease of final body weights of animals treated with catechol was noticed (with or without pre-treatment). All rats treated with catechol alone had submucosal hyperplasia, most of them had adenomas in the glandular stomach. A significant increase of adenocarcinomas was also observed in rats pre-treated with carcinogen and catechol. Forestomach results showed a mild to severe hyperplasia and a significant increase of number of carcinoma *in situ* and squamous cell carcinoma in rats pre-treated with mutagens + catechol with or without NaNO₂ treatment. Numbers of GSTP-P-positive foci in liver were significantly reduced in rats pre-treated with mutagens and catechol (p<0.05). In the other organs examined, catechol was shown to significantly reduce the incidence of thyroid follicular cell hyperplasia from 64% (basal diet) to 7% (catechol and catechol+NaNO₂; p < 0.01), the incidence of follicular cell adenoma from 29% (basal diet) to 0% (catechol +NaNO₂; p < 0.05) and the incidence of kidney nephroblastoma from 36% (basal diet) to 0% (catechol; p < 0.05). At the opposite, papillomas of oesophagus were increased to 50% after treatment with catechol +NaNO₂ (p < 0.01).

Another tumour promotion study performed on rats exposed to 0.8% of catechol during a similar time, 36 weeks (after pre-treatment to 0.1% of EHEN administered in drinking water for 3 weeks) (Okasaki et al. 1993). Nevertheless, this study revealed no carcinogen effects but only toxic effects on liver, kidney and body weight.

These results are confirmed by Kawabe et al. (1994). 20 F344 male rats were given 150 mg/kg bw of MNNG by gavage. One week later, rats were exposed for 51 weeks to 0.8% of catechol in diet with and without NaNO₂ in the drinking water. Further 15 rats/group received catechol with and without NaNO₂ without MNNG pre-treatment. The stomach, esophagus, liver, kidneys and macroscopic lesions were weighted and examined histopathologically. Treatment with MNNG alone result in only small nodules in the forestomach. In rats treated with catechol without MNNG, significant development of hyperplasia in the forestomach. In the glandular stomach, submucosal hyperplasia (27%), adenomas (100%) and adenocarcinomas (33%) were observed. Additional exposure to NaNO₂ further increased the degree of hyperplasia and papilloma development in the catechol group in

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forestomach but no influence of NaNO₂ was found in the lesion in the glandular stomach. After MNNG initiation, catechol enhanced the incidence of carcinomas but additional treatment with NaNO₂ did not further enhance lesion development. In the other organs, no histopathological findings suggestive of the influence of catechol and NaNO₂ were evident.

Table 16: Lesion in the forestomach in rats with and without MNNG treatment (Kawabe et al. 1994)

Treatment			Effective no of rats	Incidence of rats		
MNNG	NaNO ₂	chemical		Hyperplasia	Papilloma	SCC
+	+	Basal diet	20	20	15	5
+	+	Catechol	20	14	15	19
+	-	Basal diet	18	18	9	6
+	-	Catechol	20	19	18	17
-	-	Basal diet	15	0	0	0
-	-	Catechol	15	6	0	0
-	+	Basal diet	15	0	0	0
-	+	Catechol	15	15	4	1

SCC: Scamous cell carcinoma

Table 17: Lesion in the glandular stomach in rats with and without MNNG treatment (Kawabe et al. 1994)

Treatment			Effective no of rats	Incidence of rats			
MNNG	NaNO ₂	chemical		Hyperplasia	adenoma	adenocarcinoma	sarcoma
+	+	Basal diet	20	0	3	0	0
+	+	Catechol	20	10	15	15	0
+	-	Basal diet	20	0	3	0	0
+	-	Catechol	18	8	15	15	1

In the study of Maruyama et al. (1994), male hamster were fed (diet) for 30 weeks with 1.5% of catechol. Animals received a pre-treatment by subcutaneous injection once a week for 5 weeks at 500 mg/kg of BHP (an inducer of pancreatic tumours). Body weight decreased significantly and liver weight increased. The combined multiplicity of pancreatic atypical hyperplasias and adenocarcinomas in hamsters from group treated with 1.5% catechol after BHP were significantly ($p < 0.02$) decreased when compared to control group. The multiplicity of cancers was lower in catechol-treated group than in BHP alone-treated group. Liver lesions were not found in hamsters administered catechol. The incidences of gall bladder papillomas and carcinomas were not significantly different between group treated with 1.5% catechol after BHP and BHP alone-treated group.

Hagiwara et al. (1996) exposed rats to catechol (0.8%) during 104 weeks in diet. This experiment showed neither hepatocellular adenoma nor carcinoma; catechol is considered to have a low hepatocyte tumour incidence.

Short-term multi organ carcinogenesis study in rat (28-weeks exposure to 0.16 and 0.032% of catechol) revealed that low dose group (0.032%) had no one significant variation of the number of adenoma/carcinoma/papilloma in any organs tested (thyroid, lung, tongue, forestomach, small and large intestine, liver, kidney, urinary bladder) when compared to basal diet group values (Hirose et al. 1997). This study showed a significant increase of incidences of forestomach papillomas and hyperplasia at 0.032 and 0.8% of catechol co-exposed with 4 other mutagens.

In the tumour promotion study of Kobayashi (1999), mice received catechol in diet for 50 weeks at concentrations of: 0.48, 2.4, 12 or 16 mg/kg bw/d. Animals were pre-treated with MNU in drinking water for three weeks period at 120 ppm. In the MNU-catechol treated groups receiving catechol at 12 or 16 mg/kg bw/d, a significant and appreciable enhancement of pepsinogen 1 altered pyloric gland was noted. The administration of catechol in the diet enhanced only pre-neoplastic with adenomatous hyperplasia, lesion development in glandular stomach but no neoplastic lesion

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development. Another experiment with mice treated with MNU and catechol during 35 weeks showed a significant increase of incidence of adenomas in all catechol+MNU-treated groups and a significant increase of PAPG (pepsinogen isoenzyme 1 –altered pyloric gland) and incidence of carcinomas in glandular stomach only at 0.8% (Kobayashi et al. 1997).

Other mechanistic studies

DNA labelling methods was also used to assess the potential carcinogenicity of catechol on rats (Shibata et al. 1990a). They were exposed to catechol (0.8%) for 8 weeks. The authors observed an elevation of DNA synthesis and increase of labelling index in forestomach and pyloric gland epithelium and only hyperplasia in forestomach. These authors observed also an increase of hyperplasia and an increase of DNA synthesis in the forestomach epithelium of rats after only 4 weeks of exposure to 0.8% of catechol (Shibata et al. 1990b). Glandular stomach results showed a slight induction of submucosal growth and an elevation of DNA synthesis in pyloric gland cells. Since cell proliferation is well correlated with tumour promotion, these results suggest that catechol may have promoting potential for rats' stomach carcinogenesis.

Methylation may play an important role in the early stage of stomach carcinogenesis. Tatematsu et al. (1993) have exposed male rats to catechol (0.8%) for 60 weeks. The aim of the study was to assess the methylation patterns of the rat pepsinogene1 (Pg1). Catechol induced adenomatous hyperplasia but no adenocarcinomas in glandular stomach. An increase of specific methylation of CCGG sites of Pg1 gene was noticed in pyloric mucosa. The alteration of methylation of the Pg1 gene is considered as an early carcinogenic process and progressive methylation changes occur with tumour development.

Table 18: Summary of relevant carcinogenicity studies by oral exposure (feed)

Method	Main Results	Remarks	Reference
Carcinogenicity studies			
Rat (Fischer 344/DuCrj) male, 5 weeks old Organs: Blood, stomach, liver, lymph nodes, pancreas Doses tested :0, 0.1, 0.2, 0.4 and 0.8% (0, 33, 65, 141 and 318 mg/kg/day) (nominal in diet), 30 rats/group (5 rats/cage) Exposure: 34 weeks (continuously): 5 rats 104 weeks (continuously): 25 rats Equivalent or similar to OECD Guideline 451 (Carcinogenicity Studies)	Neoplastic effects: positive - benign tumours - No adverse effect on survival; Significant moderate retardation of body weight in the 0.8% group (-17%) - Significant increase of serum gastrin (blood) in the 0.2, 0.4 and 0.8% group (week 34) and all doses tested at 104 weeks - <u>Forestomach:</u> Significant increase of squamous cell hyperplasia et 0.4% (5/25) and 0.8% (10/25) (104 weeks) - <u>Glandular stomach:</u> 34 weeks: Significant increase of submucosal hyperplasia at 0.2, 0.4, 0.8% (5/5) and significant increase of adenoma at 0.4 and 0.8% (5/5) 104 weeks: Significant increase of submucosal hyperplasia at all doses tested (14/25 at 0.1%; 14/25 at 0.2% and 25/25 at 0.4 and 0.8%, significant increase of adenoma at 0.2% (23/25), 0.4% (25/25) and 0.8% (25/25) and significant ulceration at 0.4% (9/25) and 0.8% (15/25), low increase of adenocarcinoma (non-significant: 1/25 at 0.4 % and 2/25 at 0.8% vs 0 at 0%) - <u>Lymph nodes (104 weeks):</u> Cystic enlargement; significant increase in size of regional lymph nodes of the stomach in 0.4 and 0.8% group	Reliability 2: with restrictions, Key study Experimental result Test material (EC name): pyrocatechol	Hagiwara et al. (2001)

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	<ul style="list-style-type: none"> - Pancreas (104 weeks): Significant increase of acinar cell adenoma at 0.8% (6/25 vs 0/25 at 0%) 		
<p>Rat (Fischer 344) male/female, 5 weeks old Organs: Forestomach, Glandular stomach, Liver Dose tested: 0.8% (about 480 mg/kg bw/day) (nominal in diet), 30 rats/group Exposure: 104 weeks (continuously) Equivalent or similar to OECD Guideline 451 (Carcinogenicity Studies)</p>	<p>Neoplastic effects: positive – benign and malign tumours</p> <ul style="list-style-type: none"> - Slight reduction in survival rate (both sexes), - Significant decrease of final body weight (males: -17%; females: -25%); significant increase of relative liver weight in rats treated with catechol - Forestomach: Significant increase of hyperplasia in rats of both sexes (♀82% vs 17% in basal diet; ♂: 86% vs 3% in basal diet) - Glandular stomach: significant increase of submucosal hyperplasia, adenomas (♀100% vs 0% in basal diet; ♂: 100% vs 0% in basal diet) and adenocarcinomas in rats (♀43% vs 0% in basal diet; ♂: 54% vs 0% in basal diet) of both sexes - Liver: Non-significant increase of hyperplastic foci and significant decrease of number of foci in male rat (0.34 vs 1.18 in basal diet) and in female rats (1.82 vs 4.38 in basal diet) 	<p>Reliability 2: with restrictions Key study</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol</p>	<p>Hirose et al. (1993a) Hirose et al. (1990)</p>
<p>Mouse (B6C3F1) male/female; 5 weeks old Organs studied : liver, forestomach and glandular stomach Dose tested: 0.8% in the diet (ca. 960 mg/kg bw/d) (nominal in diet); 30 mice/group/sex Exposure: 96 weeks (continuously) Equivalent or similar to OECD Guideline 451 (Carcinogenicity Studies)</p>	<p>Neoplastic effects: positive - benign tumours</p> <ul style="list-style-type: none"> - Slight reduction in survival rate in female, - Significant decrease of final body weight (males: -22%; females: -41%); significant increase of relative liver weight (both sexes) - Forestomach: Significant increase of incidence of hyperplasia for both sexes: ♀86% vs 10% in basal diet; ♂: 53% vs 4% in basal diet - Glandular stomach: Significant increase of submucosal hyperplasia (♀90% vs 0% in basal diet; ♂: 100% vs 0% in basal diet) and adenomas (♀72% vs 0% in basal diet; ♂: 97% vs 0% in basal diet) but no adenocarcinomas (both sexes). - Liver: no effect on incidence of hyperplastic nodules/foci and hepatocellular carcinoma 	<p>Reliability 2: with restrictions</p> <p>Supporting study: Only one dose tested, low number of organism, only 96 weeks of exposure instead of 104 weeks</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol (purity >99%)</p>	<p>Hirose et al. (1993a) Hirose et al. (1990)</p>
<p>Rat (Wistar or Lewis or Sprague Dawley or WKY) male, 6 weeks old, 20-30 animals/group Organs: Stomach, liver, kidneys Dose tested: 0.8% (nominal in diet), Exposure: 104 weeks (continuously) Equivalent or similar to OECD Guideline 451 (Carcinogenicity Studies)</p>	<p>Neoplastic effects: positive – benign and malign tumours</p> <ul style="list-style-type: none"> - Significant decrease of body weight in all strains (from -15% to -40%) - Increase of final liver (Lewis, WKY) and kidney weight (Lewis) - Forestomach: Significant increase of hyperplasia (Wistar, WKY, Sprague Dawley; 73-70% vs 5-7% in basal diet), and papilloma (Sprague Dawley; 20% vs 0% in basal diet) - Glandular stomach: significant increase of submucosal hyperplasia (100% vs 0% in basal diet), adenoma (100-97%) and erosion/ulcer in all strains (43-80% vs 0%); significant increase of adenocarcinoma (Wistar, Lewis, Sprague Dawley; 67-77% vs 0% in basal diet) 	<p>Reliability 2: with restrictions Supporting study: strong decrease of body weight (up to -40%); only male and one dose tested, no data on food consumption</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol (purity >99%)</p>	<p>Tanaka H. et al. (1995)</p>

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<p><u>Carcinogenicity study:</u> Rat (Fischer 344) male, 6 weeks old Organs: Forestomach, glandular stomach Dose tested: 0.16% (ca. 19 mg/kg bw/d) Exposure: 104 weeks <u>Medium-term multi organ carcinogenesis study:</u> Rat (Fischer 344) male, 6 weeks old Organs: Liver, kidney, lung, esophagus, stomach, urinary bladder, intestines Doses tested: 0.16 and 0.032% (ca. 19 and 3.8 mg/kg bw/d) (nominal in diet) (continuously); 10-15 animals/group Exposure: 28 weeks DMBDD pre-treatment (5 mutagens): DEN, MNU, DMH, BBN, DHPN (4weeks)</p>	<p><u>Carcinogenicity study:</u> Neoplastic effects: positive – benign tumours</p> <ul style="list-style-type: none"> • Significant decrease of body weight (-13%) and significant decrease of relative kidney weight (-6%) • Forestomach: Slight increase of incidence of Papillary or Nodular (PN) hyperplasia and papillomas (Non-significant), no carcinoma observed • Glandular stomach: Significant increase of incidence of submucosal hyperplasia and adenoma <p><u>Medium-term multi organ carcinogenesis study:</u> Neoplastic effects: positive – benign tumours</p> <p>- No effect on body weight Without DMBDD pre-treatment: no effects on adenoma, carcinoma and papilloma in any organs studied at 0.032% and 0.16% With DMBDD pre-treatment: forestomach: significant increase of incidence of papillomas (61% vs 4%) and hyperplasia (43% vs 0%) at 0.032% and significant increase of incidence of papillomas (67% vs 0%) and hyperplasia (93% vs 13%) at 0.16%</p>	<p>Reliability 2: with restrictions Supporting study: only male tested; only one dose tested for carcinogenicity study; only 28 weeks for Medium-term multi organ carcinogenesis study</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol</p>	<p>Hirose M et al. (1997)</p> <p>Ito N. et al. (1998)</p>
<p>Rat (Fischer 344) male, 5 weeks old Organs: Glandular stomach Dose tested: 0.8% (about 480 mg/kg bw/day) (nominal in diet), 9 groups of 10-18 rats Exposure: 12 - 24 - 48 - 72 or 96 weeks (continuously) + Recovery period of 0,12, 24, 48,72 and 84 weeks</p> <p>Carcinogenesis study with recovery period (reversibility) – Non-GLP</p>	<p>Neoplastic effects: positive - malign tumours</p> <ul style="list-style-type: none"> - Significant reduction in body weight, slight increase of relative liver and kidney weights (ns) - Multiple polyploid lesions: hyperplasia, adenoma and adenocarcinoma (ns) (Pyloric region) - Time effect: increase of incidence of hyperplasia, adenomas and adenocarcinoma from 12 to 96 weeks. After 96 weeks, all rats had hyperplasia and adenomas and high level of adenocarcinomas (up to 73.3% vs 0% in basal diet) - High pyloric gland thickness during catechol treatment (significant) - Number of tumour per rat (up to 11.4 tumours/rat) and size of tumours increase (up to 93.3% of rats with tumour>2mm) with time. 	<p>Reliability 2: with restrictions Key study: Only 10-18 rats per group were used; only males treated at only one dose; This study was not carried out according to recognized international guidelines.</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol</p>	<p>Hirose et al. (1992)</p>
<p>Rat (Fischer 344) male, 6 weeks old Organs: Glandular stomach (pyloric region) Dose tested: 7 days: 0, 0.01, 0.1, 0.5, 1% (12hrs to 7 days) (ca. 0 - 6 - 60 - 300 - 600 mg/kg bw/d) 24 weeks: 0.8% in diet (ca. and 480 mg/kg bw/d) (nominal in diet); 5-6 rats/group Oral administration Exposure: 7 days and 24 weeks (continuously) Sequential morphologic changes studied. Non-GLP</p>	<p>Neoplastic effects: positive – benign tumours</p> <ul style="list-style-type: none"> - 7 days study: significant increase of labelling index at all doses tested starting 12hrs; significant increase of thickness at 0.5% and 1% (1 day to 7 days); Significant increase of apoptotic index at all doses tested until 3 days - 24 weeks study: significant increase of the thickness of mucosa, of the labelling index and apoptotic index from 4 to 24 weeks; increase of ulceration/erosion (67%), submucosal hyperplasia (100%); adenomas (83%), polyploid hyperplasia (50%) 	<p>Reliability 2: with restrictions Supporting study: Only 5 rats/group; The variation of bw was not mentioned; The exposure period was short (7 days and 24 weeks instead of 104 weeks). Non guideline. Experimental result</p>	<p>Hirose M. et al. (1999)</p>

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		Test material (EC name): pyrocatechol	
Rat (Fischer 344/DuCrj) male, 6 weeks old Organs: Liver Dose tested: 0.8 % (about 480 mg/kg bw/day) (nominal in diet), 30 animals/dose Exposure: 104 weeks (continuously) Long term feeding (carcinogenicity) study and medium term liver bioassays	Neoplastic effects: negative - Significant decrease of body weight (-17%); significant increase of liver absolute and relative weight in treated group, - No neoplastic lesions: no hepatocellular adenoma (0) or carcinoma (0)	Reliability 2: with restrictions Supporting study: Only male and one dose tested; strong decrease of body weight Experimental result Test material (EC name): pyrocatechol (purity >99%)	Hagiwara et al. (1996)
Tumour promotion studies			
Rat (Fischer 344) male, 5 weeks old Organs: Stomach, liver, Doses tested: 1.5% for 4 weeks, then 0.8% for 47 weeks (ca. 480 mg/kg bw/day) (nominal in diet), 65 male rats divided in 4 groups MNNG Pre-treatment: single intragastric administration of N-methyl-N'-nitro-N-nitrosoguanidine (MNNG) at 150 mg/kg (1 group at day 0 and another group 1 week later) Exposure: 52 weeks (continuously)	Neoplastic effects: positive – malign tumour - Decrease of final body weight in rats exposed to MNNG and catechol (-22% compared to MNNG only) - <u>Forestomach:</u> Catechol alone induces slight increase of hyperplasia and papilloma (non-significant) MNNG + Catechol treatment increases significantly the incidence of squamous cell carcinoma (100% vs 0% in basal diet group). - <u>Glandular stomach:</u> Catechol: Significant increase of adenomatous hyperplasia (100% of rats) and slight increase (non-significant) of adenocarcinoma in 20% of the rats. MNNG + Catechol: Significant increase of incidence of adenomatous hyperplasia (100% of rats) and adenocarcinoma in 94.7% of the rats.	Reliability 2: with restrictions Supporting study: Only male; test period is only 52 weeks; strong decrease of body weight Experimental result Test material (EC name): pyrocatechol (purity >99.8%)	Hirose M. et al. (1987)

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<p>Rat (Fischer 344) male, 5 weeks old Organs: Stomach Dose tested: 0.8% (ca. 480 mg/kg bw/day) (nominal in diet), 15 rats/group (10 groups) Pre-treatment: single intragastric administration of MNNG at 150 mg/kg at day 0 (1 week later: administration of catechol at 0.8% or basal diet for 51 weeks) Other groups: 0.8% catechol exposure or basal diet without MNNG pre-treatment Exposure: 52 weeks (continuously)</p>	<p>Neoplastic effects: positive – benign and malign tumours</p> <ul style="list-style-type: none"> - Significant decrease of body weight (catechol group: -20%; catechol + MNNG:-25%) and slight decrease of food intake of rats exposed to catechol with or without MNNG pre-treatment compared to basal diet - Significant increase of liver weight of rats treated with catechol with or without MNNG; significant decrease of kidney weight of rats treated with catechol with or without MNNG pre-treatment - <u>Forestomach:</u> Catechol: Significant increase of incidence of hyperplasia compared to basal diet (mild to moderate hyperplasia) (100% vs 7% in basal diet) Catechol + MNNG pre-treatment: Significant increase of incidence of papilloma (100% vs 0%) and squamous cell carcinoma compared to basal diet (100% vs 0% in basal diet) - <u>Glandular stomach:</u> Lesions in the pyloric region Catechol: Significant increase of incidence of submucosal hyperplasia (100% of rats) and adenoma (100% of rats); adenocarcinoma observed in only one rat (7% of rats). Catechol + MNNG pre-treatment Significant increase of submucosal hyperplasia (100% vs 0%), adenoma (100% vs 0%) and adenocarcinoma (73% of rats vs 0% in basal diet) 	<p>Reliability 2: with restrictions Supporting study: Only male; test period is only 52 weeks; strong decrease of body weight</p> <p>experimental result</p> <p>Test material (EC name): pyrocatechol (purity>98%)</p>	<p>Wada S. et al. (1998)</p>
<p>Rat (Fischer 344) male, 5 weeks old Organ: Stomach Dose tested: 0.8% (ca. 480 mg/kg bw/day) (nominal in diet), 15-20 rats/group MNNG pre-treatment: 150 mg/kg bw (1 week later: administration of catechol at 0.8% or basal diet with or without 0.2% NaNO₂ for 51 weeks) Other groups: 0.8% catechol exposure or basal diet without MNNG pre-treatment Exposure: 52 weeks (continuously)</p>	<p>Neoplastic effects: positive - malign tumours</p> <ul style="list-style-type: none"> - Significant decrease of body weight (-14% in catechol + NaNO₂ group), slight increase of relative liver and kidney weights - <u>Forestomach:</u> Catechol + NaNO₂: Hyperplasia moderate to severe (15% vs 0% in basal diet) Catechol + MNNG: Significant increase of incidence of papillomas (90% vs 50% in basal diet) and squamous cell carcinoma (85% vs 33% in basal diet) Catechol + NaNO₂+ MNNG: Significant increase of incidence squamous cell carcinoma (95% vs 25% in basal diet) - <u>Glandular stomach:</u> Catechol: Significant increase of adenoma (100%) and adenocarcinoma (33% vs 0% in basal diet) Catechol +/- NaNO₂: Significant increase of adenoma (85-75% vs 0% in basal diet) Catechol + MNNG +/- NaNO₂: Significant increase of submucosal hyperplasia (50%), adenoma and adenocarcinoma (75% vs 0% in basal diet) 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested ; test period is only 52 weeks;</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol (purity>99%)</p>	<p>Kawabe M. et al. (1994)</p>

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<p>Rat (Fischer 344) male, 5 weeks old Organs: Nasal cavity, lung, tongue, esophagus Dose tested: 0.8% (ca. 480 mg/kg bw/day) (nominal in diet), 10-15 rats/group 1 group pre-treated by I.P. with 25 mg/kg bw of Methyl-N-amyl nitrosamine (MNAN) at week 0,1 and 2 followed by 1 week later 0.8% catechol treatment or basal diet for 49 weeks Exposure: 52 weeks (continuously)</p>	<p>Neoplastic effects: positive - benign and malign tumours</p> <ul style="list-style-type: none"> - Significant decrease of final body weight by 21 to 24%, significant increase of relative liver and kidney weights (+/- MNAN pre-treatment) - <u>Tongue</u>: MNAN + catechol: Significant increase of incidence of PN hyperplasia (28.6% vs 18.2% in basal diet) and papilloma (57.1% vs 9.1% in basal diet) - <u>Esophagus</u>: MNAN+ catechol: Significant increase of incidence of carcinoma (64.3% vs 0% in basal diet) - <u>Lung</u>: MNAN + catechol: Significant decrease of incidence of alveolar hyperplasia (0% vs 54.5% in basal diet) - <u>Nasal cavity</u>: no effect on incidence of PN hyperplasia or papilloma 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested, short time of exposure; strong decrease of body weight Experimental result Test material (EC name): pyrocatechol (purity>99%)</p>	<p>Yamagushi S. et al. (1989)</p>
<p>Rat (Wistar) male, 5 weeks old Organs: Liver, kidney Dose tested: 0.8% in powdered basal diet (ca. 480 mg/kg bw/day), 15-20 rats/group Pre-treatment: N-ethyl-N-hydroxyethyl nitrosamine (EHEN) at 0.1% for 3 weeks; 1 week later, rats treated with 0.8% catechol or basal diet for 36 weeks Exposure: 40 weeks (continuously)</p>	<p>Neoplastic effects: negative</p> <ul style="list-style-type: none"> - Significant decrease of final body weight (-15 or 28%) - Low increase of relative liver weight and kidneys weight - <u>Liver</u>: No significant effect on incidence of hepatocellular adenoma and hepatocellular carcinoma - <u>Kidneys</u>: Slight significant decrease of number of atypical renal tubules in rats pre-treated with EHEN (82.3% vs 100%). No effect on microadenoma or renal cell tumour 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested, short time of exposure; strong decrease of body weight Experimental result Test material (EC name): pyrocatechol</p>	<p>Okazaki S. et al. (1993)</p>
<p>Rat (Fischer 344) male, 5 weeks old Organs: Forestomach, glandular stomach Dose tested: 0.2% (ca. 120 mg/kg bw/day) (nominal in diet); 15 rats/group Pre-treatment: MNNG at 150 mg/kg bw Exposure: 36 weeks (continuously)</p>	<p>Neoplastic effects: positive – benign tumours</p> <ul style="list-style-type: none"> - Significant decrease of final body weight (-6 to -7%); significant increase of liver and kidney weight - <u>Forestomach</u>: no significant effect of catechol on papilloma, carcinoma <i>in situ</i> or squamous cell carcinoma, only mild and moderate hyperplasia (+/- MNNG) - <u>Glandular stomach</u>: Catechol: Significant increase of submucosal hyperplasia (50% vs 0% in basal diet) and adenomas incidences (60% vs 0% in basal diet); No adenocarcinoma observed Catechol + MNNG: Significant increase of submucosal hyperplasia (26% vs 0% in basal diet) and adenomas incidences (26% vs 0% in basal diet). No adenocarcinoma observed. 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested, short time of exposure; low number of rats per group; The study was not carried out according to recognized international guidelines. Experimental result Test material (EC name): pyrocatechol (purity >98%)</p>	<p>Hirose M. et al. (1991)</p>

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<p>Rat (Fischer 344) male, 6 weeks old Organs: Esophagus, forestomach, glandular stomach, liver, thyroid, kidney, lung, intestine, urinary bladder Dose tested: 0.8% (ca. 480 mg/kg bw/day) (nominal in diet), 10-15 rats/group 4 weeks of pre-treatment to carcinogens: MNU, UDMH, DEN, BBN, DHPN followed by 3 days later 0.8% catechol treatment or basal diet for 24 weeks With or without NaNO₂ treatment Exposure: 28 weeks (continuously)</p>	<p>Neoplastic effects: positive - benign and malignant tumours</p> <ul style="list-style-type: none"> - Significant decrease of final body weight (-9 to -20%: with or without pre-treatment); significant increase of relative liver weight - <u>Forestomach:</u> Catechol: Mild hyperplasia (50%) Catechol + NaNO₂: Mild to severe hyperplasia (100%) Catechol + pre-treatment: Significant increase of papillomas (73% vs 0% in basal diet), squamous cell carcinoma (33% vs 0% in basal diet), and carcinoma in situ (9% vs 0% in basal diet). Catechol + pre-treatment + NaNO₂: Significant increase of carcinoma in situ (50%) and squamous cell carcinoma (100%) - <u>Glandular stomach:</u> Significant increase of submucosal hyperplasia in all group tested; significant increase of adenoma (catechol + pre-treatment, catechol+ NaNO₂, catechol); significant increase of adenocarcinoma in catechol + pre-treatment group (27% vs 0% in basal diet). - <u>Liver:</u> Significant decrease of numbers of GST-P positive foci in catechol+ pre-treatment group. No effect on hyperplastic nodule or hepatocellular carcinoma. - <u>Thyroid:</u> Catechol: Significant decrease of incidence of follicular cell hyperplasia (1 vs 9 in basal diet) Catechol + NaNO₂: Significant decrease of incidence of follicular cell adenoma (0 vs 3 in basal diet); Significant decrease of incidence of follicular cell hyperplasia (1 vs 9 in basal diet) - <u>Esophagus:</u> Significant increase of incidence of papilloma in catechol+NaNO₂ group (7 vs 0 in basal diet) - <u>Kidney:</u> Significant decrease of incidence of nephroblastoma in catechol group (0 vs 5 in basal diet) - <u>Lung, Tongue, intestine, urinary bladder:</u> no effects 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested; short time of exposure; low number of rats per group; strong decrease of body weight; The study was not carried out according to recognized international guidelines.</p> <p>Experimental result</p> <p>Test material (EC name): pyrocatechol (purity >98%)</p>	<p>Hirose M. et al. (1990a) Hirose M. et al. (1993b)</p>
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<p>Rat (Fischer 344) male, 6 weeks old Organs: Urinary bladder Dose tested: 0.8% (ca. 480 mg/kg bw/day) (nominal in diet); 20 rats/group Exposure: 32 weeks of treatment (continuously) after 4 weeks of pre-treatment with BBN or tap water</p>	<p>Neoplastic effects: negative</p> <ul style="list-style-type: none"> - Significant decrease of final body weight (-13%) in rats pre-treated with BBN - <u>Urinary bladder</u>: Slight (non-significant) increase of incidence of papilloma (4 vs 2) and carcinoma (2 vs 1) in catechol+BBN group 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested; short time of exposure; strong decrease of body weight; The study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol (purity >98%)</p>	<p>Kurata Y. et al. (1990)</p>
<p>Rat (Fischer 344) male, 5 weeks old Organs: liver Doses tested: 0.2; 0.8% in powdered basal diet (ca. 120 and 480 mg/kg bw/d) (nominal in diet); 15 rats/group Pre-treatment to DEN (200 mg/kg bw) => 2 weeks after DEN injection, 6 weeks of exposure to catechol (continuously) Exposure: 8 weeks</p>	<p>Neoplastic effects: positive</p> <ul style="list-style-type: none"> - Significant decrease of final body weight (20%) and significant increase of relative liver weight only in group of 0.8% catechol + DEN - <u>Liver</u>: Significant increase of BUdr labelling index at both dose; significant decrease of number and area of GST-P positive liver foci only in group 0.8% catechol +DEN 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested; very short time of exposure; strong decrease of body weight; The study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol (purity >99%)</p>	<p>Hasegawa R. et al. (1992)</p>
<p>Rat (Fischer 344/DuCrj) male Organs: Lung, thyroid, urinary bladder, kidneys, glandular stomach Doses tested: 0.8 % (ca. 480 mg/kg bw/day) (nominal in diet); 20 rats/group Exposure: 2 weeks pre-treatment DHPN at 0.1% followed by 30 weeks treatment with antioxidant compound (continuously) Tumour inhibition</p>	<p>Neoplastic effects: negative</p> <ul style="list-style-type: none"> - Significant decrease of body weight (-11%) and low increase of liver weight (non-significant) only in rat pre-treated with DHPN + catechol - <u>Glandular stomach</u>: non-significant submucosal and adenomatous hyperplasia in the pyloric region observed - <u>Lung</u>: significant decrease of number and areas of lung neoplastic lesions per unit section in group pre-treated with DHPN - <u>Thyroid gland</u>: Low decrease of carcinoma (non-significant) - <u>Urinary bladder, kidneys</u>: no effect on adenoma, papilloma or carcinoma 	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, only one dose tested; very short time of exposure; strong decrease of body weight; The study was not carried out according to recognized international guidelines Experimental result</p>	<p>Hasegawa R. et al. (1990)</p>

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		Test material (EC name): pyrocatechol	
<p>Rat (Fischer 344/DuCrj) male; 5 weeks old Organs: Liver, forestomach, glandular stomach, bladder, thyroid, oesophagus Dose tested: 0.8 % (ca. 480 mg/kg bw/day) (nominal in diet); 15 animals/group DMD pre-treatment: DEN + MNU+DHPN Exposure: 16 weeks (continuously)</p>	<p>Neoplastic effects: positive – benign tumours - Increase of liver weight - <u>Liver</u>: Significant decrease of the number of GST-P+ liver foci; - <u>Forestomach</u>: Catechol: Low (non-significant) increase of cell hyperplasia DMD + Catechol: Significant increase of incidence of squamous cell hyperplasia and papillomas - <u>Glandular stomach</u>: Catechol: low (non-significant) increase of submucosal hyperplasia (90%) and adenoma (40% vs 0%) DMD+ catechol: Significant induction of incidence of submucosal hyperplasia - <u>Urinary bladder, thyroid and esophagus</u>: no effect</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, low number of rats per group; only one dose tested; very short time of exposure; The study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol</p>	<p>Fukushima S. et al. (1991)</p>
<p>Rat (Fischer 344/DuCrj) male; 6 weeks old Organs: Lung, urinary bladder, forestomach, glandular stomach, seminal vesicle Dose tested: 0.8% (601.6 mg/kg bw/d, calculated by the authors) (nominal in diet); 15-16 rats/group Exposure: 16 weeks (continuously) DMD pre-treatment (4weeks): DEN + MNU+DHPN</p>	<p>Neoplastic effects: positive - benign tumours - Significant decrease of body weight (-20%) in DMD + catechol group; significant decrease of food consumption - <u>Forestomac</u>: Catechol: slight increase of squamous cell carcinoma (non-significant) DMD + catechol: Significant increase of squamous cell hyperplasias and papillomas - <u>Glandular stomach</u>: Development significant of submucosal growth pyloric glands (DMD + catechol group) and atypical glandular epithelium observed (non-significant) - <u>Lung</u>: low incidence (non-significant) of alveolar/bronchiolar adenoma in DMD + catechol group - <u>Urinary bladder</u>: low incidence (non-significant) of cell hyperplasia and cell papilloma in DMD + catechol group - <u>Seminal vesicle</u>: hyperplasia observed (non-significant)</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, low number of rats per group; only one dose tested; very short time of exposure; strong decrease of body weight; the study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol</p>	<p>Kajimura T. et al. (1992)</p>
<p>Mouse (Balb/c) male; 6 weeks old Organs: Glandular stomach (pyloric gland) Dose tested: 4, 20, 100, 500 ppm in basal diet (ca. 0.48 - 2.4 - 12 - 60 mg/kg bw/d) (nominal in diet); 10-30 animals/group Pre-treatment: MNU at 120 ppm during 3 weeks. One week after the last MNU treatment, exposure to catechol or basal diet for 50 weeks Exposure: 50 weeks (continuously)</p>	<p>Neoplastic effects: negative - No significant decrease of body weight - Slight increase but not significant of incidence of adenomatous hyperplasia and carcinomas in any catechol-treated group - Significant increase of the number of PAPG in group MNU + catechol (100 or 500 ppm) => Only induction of pre-neoplastic lesions</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, low number of mouse per group; short time of exposure; the study was not carried out according to recognized international guidelines</p>	<p>Kobayashi K. et al. (1999)</p>

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		Experimental result Test material: pyrocatechol	
<p>Mouse (Balb/c) male; 6 weeks old Organs: Glandular stomach Dose tested: 0.05, 0.2, 0.8%; 15-45 animal/group Pre-treatment: MNU at 120 ppm during 3 weeks. One week after the last MNU treatment, exposure to catechol or basal diet for 29 weeks Exposure: 20- 35 weeks (continuously)</p>	<p>Neoplastic effects: positive - benign and malign tumours - Significant decrease of body weight (-10 to -20%) at 0.8% of catechol +/- MNU pre-treatment <u>Catechol:</u> - No effect on incidence of adenoma, adenocarcinoma or PAPG number <u>MNU + catechol:</u> - Significant increase of PAPG at 0.8% (week 20) - Significant increase of incidence of adenomas at all dose tested at week 35 (20 to 32% vs 0% in basal diet) - Significant increase of incidence of adenocarcinomas 0.8% at week 35 (70% vs 0% in basal diet) ⇒ Catechol strongly enhanced the pre-neoplastic and neoplastic lesions</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested, low number of mouse per group; short time of exposure; strong decrease of body weight; the study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol</p>	<p>Kobayashi K. et al. (1997)</p>
<p>Hamster, Syrian (Syrian golden) male; 6 weeks old Organs: Liver, gall bladder, pancreas Dose tested: 1.5% in diet (ca. 1800 mg/kg bw/d) (nominal in diet); 20 animals/ group Pre-treatment with BHP for 5 weeks (5 injections of 500 mg/kg) or saline solution Exposure: 30 weeks (continuously)</p>	<p>Neoplastic effects: negative - Significant decrease of body weight in all catechol-treated group (-10.5% and -13%); significant increase of liver weight in BHP/catechol group - <u>Pancreas:</u> Significant decrease of the combined multiplicity of pancreatic atypical hyperplasias and adenocarcinomas in BHP + catechol group - <u>Liver:</u> No lesions - <u>Gall bladder:</u> No significant modifications of incidences of gall bladder papillomas and carcinomas ⇒ Weak inhibitory effect of catechol on pancreatic carcinogenesis</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested; only one dose tested; low number of hamster per group; short time of exposure; strong decrease of body weight; the study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol (purity>98%)</p>	<p>Maruyama H. et al. (1994)</p>
<p>Hamster, Syrian (Syrian golden) male; 6 weeks old Organs: Liver, pancreas Dose tested: 0.75%, 1.5 % in diet (ca. 900, 1800 mg/kg bw/d) (nominal in diet); 5 animals/ group Pre-treatment with BOP (70 mg/kg) Exposure: 20 weeks (continuously)</p>	<p>Neoplastic effects: negative - Significant decrease of final body weight (-12 to -18%); significant decrease of liver weight in all catechol-treated group - <u>Liver:</u> No liver lesions, low incidence of hepatocellular carcinoma (non-significant) in BOP+ 1.5% catechol group - <u>Pancreas:</u> Significant decrease of the number of atypical pancreatic hyperplasia and adenocarcinomas in BOP+0.75% catechol group</p>	<p>Reliability 2: with restrictions – non GLP Supporting study: Only male tested; low number of hamster per group; short time of exposure; strong decrease of body weight; the study was not</p>	<p>Maruyama H. et al. (1991)</p>

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		carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol (purity>98%)	
Rat (Fischer 344) male; 6 weeks old - <u>Drinking water experiment</u> 0.05% (about 50 mg/kg bw/day) Exposure: 78 weeks (continuously) - <u>Direct instillation into urinary bladder</u> 1-2% by direct instillation (nominal in water) in the urinary bladder Exposure: 15 weeks (twice a week) 5 groups of 30 rats Tumour promotion study	Neoplastic effects: negative - Drinking water experiment: no macroscopic or microscopic lesions - Direct instillation: only one animal (5% incidence) was found to have developed carcinoma of the urinary bladder	2 (reliable with restrictions) supporting study: Because the test performed by direct instillation of catechol in the urinary bladder is not relevant ;only 30 animals/ group ;only males; only 1 dose tested. The exposure period was short Experimental result Test material (EC name): pyrocatechol (purity >99%)	La Voie E.J. et al. (1985)
Other studies			
Rat (Wistar Kyoto, WKY) male Organs: Pyloric glandular stomach Dose tested: 0.8% (about 480 mg/kg bw/day) (nominal in diet), 10-11 rats/group Positive control: MNNG, known as carcinogen Exposure: 30, 60 weeks (continuously) Test the hypothesis that the altered methylation may play an important role in the early stage of the stomach carcinogenesis.	- Increase of adenomatous hyperplasia, no adenocarcinoma found - Increase of the number of PAPG of pyloric mucosa per cm increase with time - Increase of specific methylation in CCGG sites of the Pgl gene in adenomatous hyperplasia (same phenotype than MNNG); no effect on CGCG sites	Reliability 2: with restrictions – non GLP Supporting study: Only male tested; low number of rat per group; only one dose tested; short time of exposure; the study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol	Tatematsu M. et al. (1993)
Rat (Fischer 344) male; 6 weeks old Organs: Forestomach, glandular stomach Dose tested: 0.8% in powdered basal diet (ca. 398 mg/kg/d, based on final body weight) (nominal in diet); 5 rats/group	- Significant decrease of final body weight (20% lower than control); reduction of food and water consumption - <u>Forestomach epithelium</u> : Significant hyperplasia (from slight to moderate);Significant elevation of DNA synthesis; slight increase of labelling index - <u>Pyloric glandular epithelium</u> : significant increase of the number of Pgl-1decreased;	Reliability 2: with restrictions – non GLP Supporting study: Only male tested; low number of rat per group; only one dose tested; very short time of	Shibata MA. et al. (1990a)

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<p>Exposure: 8 weeks (continuously) DNA labelling method</p>	<p>significant elevation of DNA synthesis associated with significant increased crypt height</p>	<p>exposure; the study was not carried out according to recognized international guidelines Experimental result Test material: pyrocatechol</p>	
<p>Rat (Fischer 344) male/female; 6 weeks old Organs: Forestomach, glandular stomach Dose tested: 0.8% in powdered basal diet (ca. 480 mg/kg bw/d) (nominal in diet); 5 rats/group/sex Exposure: 4 weeks (continuously) DNA labelling method</p>	<ul style="list-style-type: none"> - Significant decrease of final body weight (males: -20%; females:-10%); reduction of food and water consumption - <u>Forestomach</u>: Significant increase of the occurrence of mild hyperplasia (both sex), significant elevation of DNA synthesis and significant increase of labelling index - <u>Glandular stomach</u>: Slight increase of submucosal growth (ns); Elevated DNA synthesis observed in association with increased crypt height of pyloric gland (ns); significant increase of BrdU-incorporating cells/crypt and significant increase of crypt height (both sexes) 	<p>Reliability 2: with restrictions – non GLP Supporting study: Low number of rats per group; very short time of exposure; only one dose tested; strong decrease of body weight; the study was not carried out according to recognized international guidelines Experimental result Test material (EC name): pyrocatechol</p>	<p>Shibata M.-A et al. (1990b)</p>
<p>Study type: The effect of catechol on the growth of 3 prostate cancer cell lines:: LNCaP, PC3 and DU145 cells Endpoint addressed: carcinogenicity</p>	<p>Cell proliferation: Catechol was found to significantly inhibit the proliferation of PC3 cells. LNCaP cells were less sensitive to this effect. In DU145 cells, catechol produced only partial inhibition. Catechol acts preferentially on the two cell lines possessing non-functional (PC3) or functional (LNCaP) androgen receptor. Results of competition experiments indicate that catechol is a very weak competitor of androgen binding. Preincubation with catechol resulted in an increased resistance of DU145 and PC3 cells to H₂O₂ toxicity. In LNCaP cells, this effect was observed only at H₂O₂ concentrations < 1 mM. Production of ROS: In PC3 cells, a significant decrease of ROS production was observed. At long incubation time (> 40 min), this effect was also observed in the DU145 cell line. LNCaP cells did not show any modification of ROS production after catechol preincubation.</p> <ul style="list-style-type: none"> • Production of NO: Catechol decreases the production/secretion of NO. 	<p>Reliability 2: with restrictions – non GLP Supporting study: <i>in vitro</i> experiment; the study was not carried out according to recognized international guidelines Experiment results Test material (EC name): pyrocatechol</p>	<p>Kampa et al. (2000)</p>

4.10.1.2. Carcinogenicity: inhalation

No data available.

4.10.1.3. Carcinogenicity: dermal

No data available.

4.10.2. Human information

No data available

4.10.3. Other relevant information

No data available

4.10.4. Summary and discussion of carcinogenicity

Results collected from carcinogenicity studies revealed that pyrocatechol induced benign (adenoma hyperplasia) and malign tumours (adenocarcinoma) on stomach of rats after 104 weeks (Hagiwara et al. 2001; Hirose et al. 1999, 1997; Tanak et al. 1995; Hirose et al. 1992; Hirose et al. 1993a, 1990). These benign/malign tumours were only found in glandular stomach while pre-neoplastic lesions (e.g. hyperplasia and/or papilloma) were mainly found in forestomach.. Recent literature has shown that forestomach tumours should be evaluated in details before discarding continuous induction of cell proliferation, hyperplasia, and ultimately carcinomas. An analysis scheme is proposed by Proctor et al (2007), in which the route of exposure, the dose levels, the genotoxicity, the tissues in which effects of the substance are observed should be considered all together so as to evaluate the relevance for humans of forestomach tumours observed in rodents.

Tumours in forestomach were only induced after co-treatment to carcinogens (Wada et al. 1998; Kawabe et al. 1994; Hirose et al. 1993, 1990a; Hirose et al. 1987). Benign tumours were also found in pancreas (Hagiwara et al. 2001) and malign tumours were present in the esophagus after pre-treatment to carcinogen (Yamagushi et al. 1989). Neoplastic lesions (papillomas, hyperplasia) were found in the tongue, esophagus and lungs in tumour promotion studies (Hirose et al. 1993b, 1990a; Yamagushi et al. 1989). No carcinogenic effect of pyrocatechol on liver was reported on rodents (Hagiwara et al. 2001, 1996; Okazaki et al. 1993; Hirose et al. 1993a, 1990).

Rat was not the only species studied: mouse and hamster were also used to assess the potential carcinogenicity of pyrocatechol. Results showed malign tumours (adenocarcinoma) in glandular stomach of mice after 104 weeks of exposure to 0.8% of pyrocatechol without pre-treatment (Hirose et al. 1990; 1993a) and after only 35 weeks exposure to 0.05%-0.8% of pyrocatechol with a pre-treatment to carcinogens (Kobayashi et al. 1997). However, tumour promotion studies on hamster were negative and decrease tumours or neoplastic lesions were observed in liver, pancreas or gall bladder after pyrocatechol exposure by oral feeding (Maruyama et al. 1991, 1994).

Overall, tumours were mainly induced on stomach of rodents at a dose of 0.8% (ca 480 mg/kg/day) of pyrocatechol. Survival of rodents was not affected by pyrocatechol exposure. However, a strong and significant decrease of body weight (from -10% to -41% at the end of most of the experiment) has been noticed at this dose. Loss of body weight was observed in male and female rats or mice and also in male hamsters (no study on female hamster). These results suggest that tumours may have been induced at a dose higher than the Maximum Tolerated Dose (MTD). As hyperplasia is a neoplastic lesion observed in most cases, cell proliferation appears as a determinant factor in the

induction of cancer in rodent by pyrocatechol. Irritating and genotoxic properties of pyrocatechol could also contribute to its ability to generate tumours in rodents.

Data collected from all these studies on carcinogenic and co-carcinogenic effect of pyrocatechol on rodents were consistent. They revealed that stomach is the main target organs with benign and malignant tumours observed at concentrations of 0.2% and 0.8% respectively. It is known that oral gavage with its physical nature of repeated administration of excessive dose volumes through the use of an oral gavage needle can result in irritation to the forestomach mucosa and/or abnormal compound absorption. In the case of pyrocatechol, all the data presented are in diet. No experimental study was carried out by gavage. A meta-analysis of forestomach carcinogens has shown that a majority (84% of the 120 evaluated), also induced tumours at other sites, while only 19 chemicals (16%) induced tumours exclusively in the forestomach. This analysis helps to appreciate if the lesions found in forestomach can be found elsewhere: in this case, it increases the possibility of a non rodent specific effect. In the case of Pyrocatechol alone, it induces only tumours in glandular stomach. However, after initiation, tumours were found also in forestomach. Finally, Understanding the mode-of-action causing forestomach tumours as either a genotoxic (or mutagenic) or nongenotoxic (not a promutagenic) mechanism is an important consideration for assessing the relevance of forestomach tumours to human cancer chemically induced.

Tumorigenesis of the forestomach squamous epithelium generally appears to be a continuum, progressing from hyperplasia and dysplasia to benign tumours and eventually to malignancy. For some chemicals (e.g., dichlorvos) where comparative data exist, the dependence of forestomach tumour development on administration by gavage, as opposed to exposure from food or drinking water, strongly suggests that the local concentration at the forestomach mucosa is more important than the total body dose on a mg/kg bw basis. Various toxicodynamic factors may influence the development of forestomach tumours. Cytotoxicity and regenerative cell proliferation in the epithelium are involved in the development of forestomach tumours by many orally administered carcinogens. In the case of carcinogens that act through a genotoxic mechanism, cell proliferation may make an important contribution to tumour development. For some carcinogens not known to be genotoxic in the forestomach, irritation leading to enhanced and sustained cell proliferation may be essential for tumour development (IARC 1999). In the case of pyrocatechol, irritant properties can be suspected as well as a genotoxic mode of action. There is no sufficient data available to conclude on the precise mechanism leading to the observed carcinogenic effects.

Finally, there is sufficient evidence to classify pyrocatechol for its carcinogenicity.

4.10.5. Comparison with criteria

Carcinogen means a substance or a mixture of substances which induce cancer or increase its incidence. Substances which have induced benign and malignant tumours in well performed experimental studies on animals are considered also to be presumed or suspected human carcinogens unless there is strong evidence that the mechanism of tumour formation is not relevant for humans.

A substance is classified in **category 1** for carcinogenicity on the basis of epidemiological and/or animal data. The substance is known or presumed human carcinogens.

- A substance is classified in **category 1A** if it is known to have carcinogenic potential for humans. The classification in this category is largely based on human evidence, human studies that establish a causal relationship between human exposure to a substance and the development of cancer.
- A substance is classified in **category 1B** if it is presumed to have carcinogenic potential for humans. The classification in this category is largely based on animal evidence, animal experiments for which there are sufficient evidence to demonstrate animal carcinogenicity.

A substance is classified in **category 2** if it is suspected human carcinogens. The placing of a substance in category 2 is done on the basis of evidence obtained from human and/or animal studies, but which is not sufficiently convincing to place the substance in category 1A or 1B.

4.10.6. Conclusions on classification and labelling

29 studies of reliability 2 are oral carcinogenicity studies or tumour promotion study with pyrocatechol. They all demonstrated the carcinogenic effect on pyrocatechol on glandular stomach on rats with formation on adenomas or adenocarcinomas. It is important to notice that effects appeared at high dose of 0.4% and mainly 0.8%. The lowest doses tested presented submucosal hyperplasia indicating that repeated administration of important dose at the site of application (stomach) lead to toxic effect for which the severe form at high dose were carcinoma and adenocarcinoma. Three species were studied: rat, mouse and hamster. It was clearly demonstrated that rat was the most sensitive.

Co-carcinogenicity studies permitted to better understand the mechanisms of co-carcinogenesis and tumour promotion. They all confirmed the carcinogenic effect of pyrocatechol on glandular stomach in rats, and indicated that pyrocatechol could inhibited carcinogen effect of some substances on specific organs like the effect of BOP on pancreas of hamster (Maruyama et al. 1991). According to data available, pyrocatechol did not exert carcinogen effect on other organs than the site of application after oral administration: esophagus and stomach (glandular and forestomach) of rat.

The specific carcinogenic effect of pyrocatechol on rat glandular stomach after oral administration, at high dose was the result of progressive aggressive action of the mucous membrane by formation of inflammation, apoptosis, erosion and ulceration and then cell proliferation, hyperplasia, responsible after long term exposure to formation of adenoma and carcinoma. The co-effect of the genotoxic properties of pyrocatechol cannot be excluded.

Pyrocatechol may play a role in human gastric cancer development, so it makes this compound an obvious target for carcinogenesis classification. IARC (1999) classify pyrocatechol as possibly carcinogenic to humans (Group 2B).

According to results from all carcinogen studies showing induction of tumours in one organ in one species and IARC classification, we propose to classify **pyrocatechol as carcinogen of category 2 or suspected human carcinogen.**

RAC evaluation of carcinogenicity

Summary of the Dossier Submitter's proposal

Twenty nine studies of (Klimisch) reliability 2 were assessed by the DS. These studies were dedicated carcinogenicity studies (8) or tumour promotion studies (20) with pyrocatechol. RAC noticed that one study (Kampa *et al.*, 2000) reported on the inhibition by pyrocatechol of the proliferation of 3 prostate cancer cell lines (LNCaP, PC3, DUI45). Three species were studied: rat, mouse and hamster. It was clearly demonstrated that the rat was the most sensitive species.

The DS stated that all the carcinogenicity and tumour promotion studies demonstrated the carcinogenic effect of pyrocatechol on the glandular stomach of rats with formation of adenomas and in some cases adenocarcinomas (Hagiwara *et al.*, 2001; Hirose *et al.*, 1993a;

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Hirose *et al.*, 1990; Hirose *et al.*, 1992; Hirose *et al.*, 1987; Tanaka *et al.*, 1995; Wada *et al.*, 1998; Kawabe *et al.*, 1994). However, RAC points out that there is one exception in the Hasegawa *et al.* (1990) study, where, after pre-treatment with DHPN, non-significant mucosal and adenomatous hyperplasia in the pyloric region was observed. It is also important to note that, according to the DS, effects appeared at doses of 0.4% and mainly of 0.8% in the diet. RAC, on the other hand, noticed that in the Hirose *et al.* (1991) study, adenomas (60% vs 0% in the basal diet) were observed in the glandular stomach of the Fischer 344 male rat at 0.2% (ca 120 mg/kg bw/d). At the lowest doses tested, submucosal hyperplasia was observed at the site of administration (stomach) after repeated administration suggesting a dose-related progression to the carcinomas and adenocarcinomas seen in animals given the high dose. In addition, RAC noted that in two mouse studies, adenomas in both sexes (B6C3F1, Hirose *et al.*, 1990; Hirose *et al.*, 1993) and both adenomas and adenocarcinomas in male Balb/c mice were reported (Kobayashi *et al.*, 1997).

After initiation, tumours were also found in the forestomach. Understanding the mode-of-action leading to forestomach tumours to be either a genotoxic (or mutagenic) or non genotoxic (not promutagenic) mechanism is an important consideration for assessing the relevance of forestomach tumours in animals to humans. Tumorigenesis of the forestomach squamous epithelium generally appears to be a continuum, progressing from hyperplasia and dysplasia to benign tumours and eventually to malignancy. For some chemicals (e.g., dichlorvos) where comparative data exist, the dependence of forestomach tumour development on administration by gavage, as opposed to exposure from food or drinking water, strongly suggests that the local concentration at the forestomach mucosa is more important than the total systemic dose on a mg/kg bw basis. Various toxicodynamic factors may influence the development of forestomach tumours. Cytotoxicity and regenerative cell proliferation in the epithelium are involved in the development of forestomach tumours by many orally administered carcinogens. In the case of carcinogens that act through a genotoxic mechanism, cell proliferation may make an important contribution to tumour development. For some carcinogens not known to be genotoxic in the forestomach, irritation leading to enhanced and sustained cell proliferation may be essential for tumour development (IARC, 1999).

Co-carcinogenicity (tumour promotion) studies confirmed the carcinogenic effect of pyrocatechol on glandular stomach of rats, and indicated that pyrocatechol could inhibit the carcinogenic effect of some substances on specific organs, like the effect of BOP (N-nitroso-bis(2-oxopropyl)amine) on the pancreas of the hamster (Maruyama *et al.*, 1991). According to the available data, pyrocatechol did not exert a carcinogenic effect on organs other than the site of application (contact) after oral administration: oesophagus and stomach (glandular and forestomach) of the rat. Nevertheless, RAC noted that in the Hagiwara *et al.* (2001) study, acinar cell adenomas in the pancreas of male Fischer 344 rats at a dose 0.8% pyrocatechol were reported.

The DS argued that the specific carcinogenic effect of pyrocatechol on rat glandular stomach after oral administration at high doses was the result of its progressive aggressive action of the mucous membrane by formation of inflammation, apoptosis, erosion and ulceration and then cell proliferation, hyperplasia, responsible after long term exposure to formation of adenoma and carcinoma. A contribution of the genotoxic properties of pyrocatechol cannot be excluded. As hyperplasia is a pre-neoplastic lesion observed in most cases, cell proliferation appears as a determinant factor in the induction of cancer in rodents by pyrocatechol. Irritating and genotoxic properties of pyrocatechol could also contribute to its ability to generate tumours in rodents.

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Pyrocatechol may play a role in human gastric cancer development. IARC (1999) have concluded that pyrocatechol is possibly carcinogenic to humans (Group 2B).

The DS, therefore, proposed that, according to results from all carcinogen studies showing induction of tumours in one organ in one species and IARC classification, pyrocatechol should be classified as carcinogenic in category 2 (suspected human carcinogen).

Comments received during public consultation

During public consultation (PC), two comments from MSCAs were received. One MSCA supported classification of pyrocatechol as carcinogen, category 2.

On the other hand, the other MSCA argued that classification as carcinogen, category 1B should be considered. They pointed out that tumorigenicity (benign and malignant tumours) is observed in two species: more specifically, 6 out of 7 dedicated carcinogenicity studies available in rats were positive, and the single dedicated carcinogenicity study in mice was positive. Malignant and benign tumours were observed in the glandular stomach of both sexes in rats. Benign tumours were observed in both sexes in the glandular stomach of both sexes in mice. Furthermore, pyrocatechol was shown to be mutagenic.

On a totally different line of argumentation, Industry believed that the classification of pyrocatechol for carcinogenicity represented a borderline case. Some data could warrant a carcinogen category 2 classification, while other elements of the available data indicated that a classification for carcinogenicity is not needed. Furthermore the exposure route (oral) is not relevant for human exposure. Finally there were also indications that pyrocatechol could reduce the incidence of cancer, which might be due to the antioxidant effect of catechol.

More specifically, the Industry representative pointed out that:

- Nearly all studies were performed in Japan.
- The dose of 0.8% of pyrocatechol in the diet, which resulted in a significant increase in adenocarcinomas in the glandular stomach of rats for both sexes, is considered to be high enough to cause a decrease in body weight and an increase in liver weight. No malignant tumours were reported at lower doses.
- At lower doses, though, submucosal hyperplasia, ulceration and adenomas of the glandular stomach of rats were found. This shows that pyrocatechol has a local toxic effect on the glandular stomach at low doses, while at the high dose of 0.8% in the diet this results in adenocarcinomas. For this reason there is clearly a threshold for the carcinogenic effects of catechol.
- Hyperplasia was not only found in the glandular stomach but also in the forestomach of the rats.
- In mice (B6C3F1) at a dietary dose level of 0.8%, submucosal hyperplasia and adenomas of the glandular stomach but no carcinomas were found (applicable for both sexes) during this 96-week study. Also for mice, the body weight decreased, while the liver weight increased at this dose.
- In studies on Syrian hamsters, no carcinomas of the glandular stomach were found but the study duration was only 30 or 20 weeks.
- The carcinogenicity studies with rodents have only been performed using an oral route of exposure. However, this route is not relevant for humans, and extrapolation from the oral route to the inhalation route is normally not possible for local effects. Therefore, it is questionable if the carcinogenicity data are relevant for humans.

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- Based on the information from an Industrial regulatory database, the national occupational exposure limit (time weighted average) of pyrocatechol in most of the EU countries is 20-23 mg/m³. These values are similar to the ACGIH Threshold Limit Value (TLV) of 5 ppm, which is equivalent with 23 mg/m³. The DNEL in the REACH registration dossier is calculated at 1 mg/m³ for long term inhalation exposure of workers. It could be useful to compare the worker occupational exposure concentration against the oral dose level of 0.8% in the carcinogenicity studies, which resulted in adenocarcinomas of the glandular stomach. The equivalent daily oral dose of workers exposed at 50% of the DNEL level (0.5 mg/m³), would be of about 0.06 mg/kg bw, about 8000 times lower than the daily dose in rats (480 mg/kg bw). This shows that the dose level which results in adenocarcinomas for rats is much higher than the potential worker exposure level.
- In a tumour promotion study in rats reported by Hasagawa *et al.* (1990,) co-treatment with DHPN (N-bis(2-hydroxypropyl)nitrosamine) and pyrocatechol seemed to decrease slightly the incidence of carcinogenic effects (thyroid and lung) observed with DHPN alone.
- In a tumour promotion study of Maruyama *et al.* (1991) with hamsters, the numbers of atypical pancreatic hyperplasias and adenocarcinomas were significantly decreased if the animals were co-exposed to BOP and pyrocatechol, when compared to BOP alone.
- Maruyama *et al.* (1994) reported a similar protective effect of pyrocatechol in hamsters treated with BHP (N-nitrosobis-(2-hydroxypropyl)amine). The decrease in the carcinogenic effect of nitrosamines due to exposure to catechol might be due to the antioxidant effect of catechol.

Based on the available mutagenicity data (studies showed *in vivo* mutagenicity) and carcinogenicity data (several studies with rats showing adenocarcinomas of the glandular stomach) there are arguments for classifying pyrocatechol as a category 2 carcinogen. On the other hand, the Industry representative argued that the adenocarcinomas of the glandular stomach have been found only in one species (rats but not for mice or hamsters) in one organ (glandular stomach) and only using the very high dietary dose level of 0.8%. Additionally, the adenocarcinomas are due to local effects and there is a clear threshold because doses lower than 0.8% do not show adenocarcinomas of the glandular stomach.

Assessment and comparison with the classification criteria

In the CLH dossier, twenty eight studies with pyrocatechol of reliability 2 (Klimisch) were presented; eight were carcinogenicity studies and twenty were tumour promotion studies. Four of the carcinogenicity studies were conducted according to the equivalent or similar OECD TG 451.

In all studies the oral administration route (via diet) was applied and gavage was not used.

Six strains of rat (Fischer 344/DuCrj, Fischer 344, Wistar, Wistar Kyoto, WKY, Sprague Dawley, Lewis), two strains of mouse (Balb/c, B6C3F1) and Syrian golden hamster were studied. Only two studies, one with B6C3F1 mouse and one with the Fischer 344 rat, tested both sexes.

Among the organs studied (forestomach, glandular stomach, liver, lymph nodes, pancreas, kidney, thyroid, nasal cavity, lung, tongue, oesophagus, urinary bladder, intestine) the forestomach, the glandular stomach, the pancreas and the oesophagus were proven prone to tumorigenesis (malignant and/or benign tumours, namely adenomas, acinar adenomas and adenocarcinomas). Some histopathological findings were observed in the liver and the lymph nodes. Tumours on the forestomach were not discussed by RAC, although they could be relevant to humans, since they are observed after oral administration (not gavage) of a non-corrosive mutagenic substance (CLP Guidance1 – June 2015, p. 375). Nevertheless,

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pyrocatechol is irritating (to both the skin and eyes, with existing classifications for these hazards in Annex VI of CLP). According to the DS, a meta-analysis of forestomach carcinogens has shown that a majority of them (84% of the 120 evaluated carcinogens) also induced tumours at other sites, while only 19 chemicals (16%) induced tumours exclusively in the forestomach (Proctor *et al.*, Toxicology Science, 98(2):313-26, 2007).

RAC notes that in all the studies presented in the CLH dossier, no evidence of tumorigenesis was observed in the control group.

In the carcinogenicity studies, the dietary pyrocatechol doses were between 0-1% (0- 600 mg/kg bw/d in rats, ca 960 mg/kg bw/d in mice), while in the tumour promotion studies, a fixed dose of 0.8% (480 mg/kg bw/d) was applied in the majority of experiments. A dose of 0.2% in the rat diet was also administered, along with a dose range between 0.48-960 mg/kg bw/d in two Balb/c male mouse studies with N-methyl-N-nitrosourea (MNU) pre-treatment. In the Syrian golden hamster studies, doses were up to 1.5% in the diet (1800 mg/kg bw/d). The duration of exposure varied from 7 days to 104 weeks. Significant increase in the labelling index and the apoptotic index was noticed as early as 7 days after start of exposure (Hirose *et al.*, 1999). Adenomas were noticed after 24 weeks of exposure, while adenocarcinomas were seen in rats at 52 weeks of exposure (Kawabe *et al.*, 1994) and in mice at 96 weeks of exposure (Hirose *et al.*, 1990; Hirose *et al.*, 1993a).

RAC considered 4 of the carcinogenicity studies, all performed using a methodology consistent with OECD TG 451 as the key studies. From the other 4 carcinogenicity studies, Hirose *et al.*(1997) tested only one low dose (0.16%, ca 19 mg/kg bw/d), the Hirose *et al.*(1992) and Hirose *et al.*(1999) studies applied a similar protocol and provided similar results with the Hirose *et al.*(1993a) and the Hirose *et al.*(1990) studies, while the Hagiwara *et al.*(1996) study focused only on the liver at a dose of 0.8% (ca 480 mg/kg bw/d). In addition, 3 tumour promotion studies were discussed, in which the effects on the pyrocatechol group without pre-treatment were investigated. A further 3 tumour promotion studies were also considered, where pyrocatechol after pre-treatment with methyl-N-amyl nitrosamine (MNAN), NaNO₂ and MNU increased the incidence of benign and malignant tumours in the oesophagus of rats and the glandular stomach of mice, respectively.

In the following table the studies used by RAC for classification purposes are summarized:

Study	Species	Dosage range and duration	Sex	Findings				
				Target organ	Dose	Benign tumours	Malign tumours	Other
Carcinogenicity studies								
Hagiwara <i>et al.</i> , 2001	Fischer 344/DuCrj rats	0, 0.1, 0.2, 0.4, 0.8% (0, 33, 65, 141, 318 mg/kg bw/d) 104 weeks	Male	Glandular stomach	0.1%			Significant submucosal hyperplasia and ulceration, significant squamous cell hyperplasia in the forestomach, no papillomas or carcinomas in the forestomach
					0.2%	Adenomas 23/25 rats		
					0.4%	Adenomas 25/25 rats	Adenocarcinomas 1/25 (NS)	
					0.8%	Adenomas 25/25 rats	Adenocarcinomas 2/25 (NS)	
				Pancreas	0.2%	Acinar cell adenomas 1/25 (NS)		
					0.4%	Acinar cell adenomas 1/25 (NS)		

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					0.8%	Acinar cell adenomas 6/25		
Hirose <i>et al.</i> , 1993a; Hirose <i>et al.</i> , 1990	Fischer 344 rats	0.8% (480 mg/kg bw/d) 104 weeks	Male	Glandular stomach	0.8%	Adenomas 30/30 rats	Adenocarcinomas 16/30 rats	Significant submucosal hyperplasia, significant hyperplasia of the forestomach in both sexes
				Pancreas		Acinar cell adenomas 1/29 (NS)		
			Female	Glandular stomach	0.8%	Adenomas 30/30 rats	Adenocarcinomas 13/30 rats	
Hirose <i>et al.</i> , 1993a; Hirose <i>et al.</i> , 1990	B6C3F1 Mice	0.8% (960 mg/kg bw/d) 96 weeks	Male	Glandular stomach	0.8%	Adenomas 29/30 mice		Significant submucosal hyperplasia, significant hyperplasia of the forestomach in both sexes
			Female	Glandular stomach	0.8%	Adenomas 22/30 mice		
Tanaka <i>et al.</i> , 1995	Wistar rats	0.8% (nominal in diet) 104 weeks	Male	Glandular stomach	0.8%	Adenomas 29/30 rats	Adenocarcinomas 20/30 rats	Significant submucosal hyperplasia 30/30 rats Erosion and ulcer 13-24 rats Significant hyperplasia of the forestomach
	WKY Wistar rats					Adenomas 30/30 rats	Adenocarcinomas 3/30 rats (NS)	
	Lewis rats					Adenomas 29/30 rats	Adenocarcinomas 22/30 rats	
	Sprague Dawley rats					Adenomas 30/30 rats	Adenocarcinomas 23/30 rats	
Tumour promotion studies								
Wada <i>et al.</i> , 1998	Fischer 344 rats	0.8% (ca 480 mg/kg bw/d) (nominal in diet) 52 weeks	Male	Glandular stomach	0.8%	Adenomas 15/15 rats	Adenocarcinomas 1/15 rats	Significant submucosal hyperplasia Mild to moderate significant hyperplasia in the forestomach
Kawabe <i>et al.</i> , 1994	Fischer 344 rats	0.8% (ca 480 mg/kg bw/d) (nominal in diet) 52 weeks	Male	Glandular stomach	0.8%	Adenomas 15/15 rats	Adenocarcinomas 5/15 rats	
Hirose <i>et al.</i> , 1991	Fischer 344 rats	0.2% (ca 120 mg/kg bw/ day) (nominal in diet) 36 weeks	Male	Glandular stomach	0.2%	Adenomas 9/15 rats	No adenocarcinomas	Significant submucosal hyperplasia, no significant effect on the findings of the forestomach
Yamaguchi <i>et al.</i> , 1989	Fischer 344 rats	0.8% (ca 480 mg/kg bw/d) (nominal in diet) 52 weeks	Male	Oesophagus	MNAN (25 mg/kg bw) + pyrocatechol (ca 480 mg/kg bw/d)		Squamous cell carcinomas 64.3%	

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Hirose <i>et al.</i> , 1993b; Hirose <i>et al.</i> , 1990	Fischer 344 rats	0.8% (ca 480 mg/kg bw/d) (nominal in diet) 28 weeks	Male	Oesophagus	0.8% pyrocatechol	Papillomas 3/15 rats		
					NaNO ₂ (0.3%) + pyrocatechol (ca 480 mg/kg bw/d)	Papillomas 7/15 rats		
Kobayashi <i>et al.</i> , 1997	Balb/c mice	0.05, 0.2, 0.8% 20, <u>35</u> weeks	Male	Glandular stomach	MNU (120 ppm) + pyrocatechol 0.05%	Adenomas 6/19 mice	Adenocarcinomas 3/19 mice	Pyrocatechol strongly enhanced pre-neoplastic and neoplastic lesions
					MNU (120 ppm) + pyrocatechol 0.2%	Adenomas 7/19 mice	Adenocarcinomas 3/19 mice	
					MNU (120 ppm) + pyrocatechol 0.8%	Adenomas 4/20 mice	Adenocarcinomas 14/20 mice	

As shown in the table above, survival of rodents was not affected by pyrocatechol exposure. The DS argued that a significant lower body weights (from -10% to -41% at the end of most of the experiments relative to control) was noticed at 0.8% pyrocatechol. RAC notes that the 41% decrease in body weight refers to female mice in the Hirose study (Hirose *et al.*, 1993a), where the incidence of adenocarcinomas in females was found to be 43%. The average reduction in body weight observed at 0.8% pyrocatechol in male mice was calculated from all available studies in the CLH dossier to be 17.7±4.73%. At doses of 0.16% and 0.2% (Hirose *et al.*, 1997 and Hirose *et al.*, 1991, respectively) the observed decrease in body weight was 13% and 7%, respectively. No adverse effects on survival rates were observed. A slight reduction in food consumption was also observed ranging from essentially no difference relative to the control group to 15.3% in 5 studies (Hagiwara *et al.*, 2001; Hirose *et al.*, 1990; Kawabe *et al.*, 1994; Hirose *et al.*, 1993b; Wada *et al.*, 1998) which is as expected, since the affected organ is the stomach. These results do not support the DS suggestion that tumours may have been induced at a dose higher than the Maximum Tolerated Dose (MTD).

Data collected from all these studies on carcinogenic and co-carcinogenic effects of pyrocatechol on rodents were consistent.

Two species, rats (several strains) and mice (B6C3F1 and Balb/c), were susceptible to tumorigenesis. Both sexes were found with adenomas and adenocarcinomas in rats and adenomas in mice.

The stomach is the main target organ with benign tumours observed at doses ≥ 0.2% (0.8% in the majority of cases) and malignant tumours were observed at doses of 0.4% and 0.8%, with a dose-response relationship evident in the Hagiwara *et al.* (2001) study, where the incidence of adenocarcinomas was not statistically significant.

The potential reversibility of glandular stomach lesions induced by catechol was studied by Hirose *et al.* (1992). Incidences of submucosal hyperplasia, adenomas and adenocarcinomas, average number of tumours per rat, and the size of tumours in glandular stomach of rats treated with 0.8% of catechol from 12 to 96 weeks increased in a time-dependent manner.

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After cessation of pyrocatechol treatment, the average number of tumours per rat tended to slightly decrease, although the size of tumours tended to increase. Labelling indices in both adenomas and non-tumorous areas decreased significantly after cessation of catechol treatment.

Other sites of tumorigenesis were also found: the pancreas (acinar cell adenomas that are difficult to differentiate from adenocarcinomas) (<http://www.eurotoxpath.org/nomenclature/index.php>) and oesophagus. Neoplastic lesions (papillomas, hyperplasia) were found in the tongue, oesophagus and lungs in tumour promotion studies (Hirose *et al.*, 1993b, 1990 and Yamagushi *et al.*, 1989).

The mechanism through which pyrocatechol may express its carcinogenic potential is still not fully understood. Both stochastic genotoxic as well as non-genotoxic mechanisms are likely to play a role. A generally accepted hypothesis is that pyrocatechol induces oxidative DNA damage. It is for instance assumed that in an aqueous environment (pH around or above neutrality) pyrocatechol undergoes Cu²⁺-mediated autoxidation to generate Cu⁺ and semiquinone radicals (Oikawa *et al.*, 2001). Binding of Cu⁺ to oxygen generates reactive oxygen species, but also reduction of semiquinone radicals into 1,2-benzoquinone may have the same effect (IARC Monogr. Eval. Carcinog. Risks. Hum., 1999). These reactive oxygen species may ultimately lead to DNA damage, and thus to the risk of cancer development. The presence of antioxidant enzymes, such as superoxide dismutase and catalase, should remove reactive oxygen species, resulting in reduced DNA damage, but so far these enzymes did not clearly influence pyrocatechol-induced DNA damage *in vitro* (Oikawa *et al.*, 2001). Further research is needed to clarify these findings.

At the same time, DNA methylation may play an important role in the early stage of stomach carcinogenesis. Tatematsu *et al.* (1993) has exposed male rats to catechol (0.8%) for 60 weeks. The aim of the study was to assess the methylation patterns of the rat pepsinogen1 (Pg1) gene. Catechol induced adenomatous hyperplasia but no adenocarcinomas in the glandular stomach. An increase in specific methylation of CCGG sites of the Pg1 gene was noted in the pyloric mucosa. The alteration of methylation of the Pg1 gene is considered to be an early event in the carcinogenic process and progressive methylation changes occur with tumour development.

Furthermore, DNA labelling methods showed a slight induction of submucosal growth in the glandular stomach and an elevation of DNA synthesis in the pyloric gland cells. Since cell proliferation is well correlated with tumour promotion, these results suggest that catechol may have promoting potential for rats' stomach carcinogenesis (Shibata *et al.*, 1990a and 1990b).

In addition, pyrocatechol was found to be locally genotoxic with regards to duodenum cells (significant increase in DNA strand breaks using the Comet assay) (Study report N° 18255, 2008) and to oesophageal epithelial cells.

Another mechanism of induction of tumours in the glandular stomach by pyrocatechol could be associated with the "gastrin hypothesis" (Chandra *et al.*, 2010; Larsson *et al.*, 1988; Håkanson and Sundler, 1990), which applies to antisecretory drugs, such as omeprazole.

In the Hagiwara *et al.* (2001) study, serum gastrin levels were found to be elevated at a dose of 0.1% w/w (NS) and from 0.2% w/w the increase in gastrin levels reached even 50% both at 34 and 104 weeks, with a clear dose-response relationship and a correlation with the proliferative lesions of pyloric gland.

The gastrin hypothesis may be outlined as follows:

(1) Inhibition of gastric acid secretion leads to elevated antral pH and, secondarily, to release of gastrin from the antral gastrin cells into the blood stream.

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(2) Gastrin causes both general hypertrophy of the oxyntic mucosa and hyperplasia of the Enterochromaffin-like (ECL) cells in the oxyntic mucosa.

Hypergastrinemia secondary to inhibition of gastric acid secretion by drugs such as omeprazole is generally associated with a topical effect on the fundic mucosa resulting in increased stomach weight and increased mucosal thickness (hypertrophy) (White *et al.*, 1998; Rohr and Tuch 1992; Creutzfeldt *et al.*, 1986). Such histopathological findings are consistently observed in all studies with pyrocatechol.

Because no endocrine cell hyperplasia or tumours were found in the fundic region in Hagiwara *et al.* (2001), the study authors supported the hypothesis that tumorigenesis in the glandular stomach caused by pyrocatechol could be a secondary proliferative response of the gastrin secreting G-cells in the pylorus.

Despite the possibility that the "gastrin hypothesis" MoA applies, the possibility that pyrocatechol may exert its carcinogenic effect by its irritating properties, also a non genotoxic mechanism, cannot be entirely excluded. Chronic exposure to irritants may induce continuous cell proliferation, making the cells prone to DNA damage. The fact that the vast majority of the observed effects are focused on the glandular stomach, which represents local application of the irritant may provide further support to this theory.

Nevertheless, in all studies the administration of pyrocatechol was made via the diet and not by gavage, rendering the mode of administration less extreme. In addition, the carcinogenic effects observed in the forestomach were less severe than those observed in the glandular stomach. In contrast, significant ulceration was observed in the glandular stomach (at 104 weeks) at the same or higher doses than adenomas (0.4% vs 0.2%) which were also observed after 34 weeks (Hagiwara *et al.*, 2001). Ulcerations were observed to a lesser extent than adenomas for a given dose (e.g. Wistar rats 43% vs 97%, Lewis rats 70% vs 97%, at a dose 0.8% w/w) (Tanaka *et al.*, 1995), thus the mode of action of irritancy is considered less predominant for carcinogenicity.

Therefore, bearing in mind all the above, the consideration to downgrade a Category 1 to a Category 2 classification due to chronic stimulation of cell proliferation, as suggested in the CLP Guidance (p. 380), is not applicable for pyrocatechol.

In conclusion, according to 3.6.1.1 and 3.6.2.2.3 of Annex I of the CLP Regulation, since pyrocatechol can induce benign and malignant tumours in two species in both sexes (mainly) in the glandular stomach, RAC considers that pyrocatechol should be classified as **Carc. 1B (H350: May cause cancer)**.

4.11. Toxicity for reproduction

Not relevant for this dossier

4.12. Other effects

Not relevant for this dossier

5. ENVIRONMENTAL HAZARD ASSESSMENT

Not relevant for this dossier

6. OTHER INFORMATION

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