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Helsinki, 03 November 2021

Addressees
Registrants of JS_EC_282-199-6 listed in the last Appendix of this decision

Date of submission of the dossier subject of a decision
17/02/2021

Registered substance subject to this decision, hereafter 'the Substance'
Substance name: 1,2-Ethanediamine, N-(2-aminoethyl)-, reaction products with glycidyl tolyl ether
EC number: 282-199-6
CAS number: 84144-79-6

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

DECISION ON TESTING PROPOSAL(S)

Based on Article 40 of Regulation (EC) No 1907/2006 (REACH), your proposed test using the Substance is rejected, according to Article 40(3)(d):

Pre-natal developmental toxicity study (EU B.31./OECD TG 414)

Reasons for the rejection are explained in Appendix A.

Appeal

This decision can be appealed to the Board of Appeal of ECHA within three months of its notification. An appeal, together with the grounds thereof, has to be submitted to ECHA in writing. An appeal has suspensive effect and is subject to a fee. Further details are described under: http://echa.europa.eu/regulations/appeals.

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

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

Appendix A: Reasons to reject testing proposal under Annex VIII to REACH

This decision is based on the examination of the testing proposal you submitted.

1. Pre-natal developmental toxicity study

A pre-natal developmental toxicity (PNDT) study may be proposed in case of serious concerns about the potential for adverse effects on development under Annex VIII to REACH (Section 8.7.1., column 2).

1.1. Information provided

You have submitted a testing proposal for a PNDT study according to OECD TG 414 with the Substance.

ECHA requested your considerations for alternative methods to fulfil the information requirement for Developmental toxicity. You provided your considerations concluding that there were no alternative methods which could be used to adapt the information requirement(s) for which testing is proposed. ECHA has taken these considerations into account.

To justify your testing proposal, you have provided results of various QSAR models which reveal '*some positive predictions for developmental toxicity'*. More specifically, the positive predictions come from the model "Developmental Toxicity model (CAESAR) (version 2.1.7)" and DART profilers from the QSAR Toolbox.

We have assessed the provided information and identified the following issues:

a) ECHA notes that the predictions from the other models you provided (Estrogen Receptor-mediated effect - IRFMN/CERAPP, Toxicity to reproduction - Gnarus cat-SAR) give contradicting information with negative results.
b) Concerning the predictions from the "Developmental Toxicity model (CAESAR) (version 2.1.7)", the automatic assessment of the model considers the target structures to be within the applicability domain. However, the report you provide, as attachment in IUCLID section 7.8.1 (`[redacted], gives the following warning concerning the similar molecules used to assess the applicability of the model: "*The feature has a non optimal assessment, this aspect should be reviewed by an expert*." ECHA notes that you have not provided such an expert review to prove the reliability of the prediction. In the absence of the expert review, ECHA cannot establish that the prediction can be used to justify the testing proposal.
c) Concerning the results of the DART profilers, we note that Toolbox profilers are models developed for the purpose of identifying analogues and not to make predictions (as indicated on the official QSAR Toolbox website https://qsartoolbox.org/features/profiling/). Most profilers lack, as an example, measures of internal performance and predictivity for apical endpoints. Therefore, additional justifications would be needed to use their results as predictions.

As explained above (issues a-c), the provided QSAR models do not indicate serious concerns about the potential for adverse effects on development. Therefore, ECHA considers that a PNDT study is not justified at this tonnage band.

1.2. Outcome

Under Article 40(3)(d) of REACH, the proposed test is rejected.

Appendix B: Procedure

ECHA started the testing proposal evaluation in accordance with Article 40(1) on 23 February 2021.

ECHA held a third party consultation for the testing proposal from 18 March 2021 until 3 May 2021. ECHA did not receive information from third parties.

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

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

ECHA did not receive any comments within the commenting period.

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

As no amendments were proposed, ECHA adopted the decision under Article 51(3) of REACH.

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

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

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

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