~~Confidential~~

Helsinki, 4 May 2022

Addressees
Registrants of joint submission of BP-1 as listed in Appendix 3 of this decision

Date of submission of the dossier subject to this decision
08/04/2014

Registered substance subject to this decision ("the Substance")
Substance name: 2,4-dihydroxybenzophenone
EC number: 205-029-4

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

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below, by the deadline of ***9 August 2023***.

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

Information required from all the Registrants subject to Annex VII of REACH

1. In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.; test method: OECD TG 471, 2020);

2. Short-term toxicity testing on aquatic invertebrates (Annex VII, Section 9.1.1.; test method: EU C.2./OECD TG 202);

3. Ready biodegradability (Annex VII, Section 9.2.1.1.; test method: EU C.4. A/B/C/D/E/F/OECD TG 301A/B/C/D/E/F or EU C.29./OECD TG 310);

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

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

5. If negative results are obtained in tests performed for the information requirement of Annex VII, Section 8.4.1. and Annex VIII, Section 8.4.2., then: In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method: OECD TG 476 or TG 490);

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

7. Screening for reproductive/developmental toxicity (Annex VIII, Section 8.7.1.; test method: EU B.63/OECD TG 421 or EU B.64/OECD TG 422) by oral route, in rats;

8. Short-term toxicity testing on fish (Annex VIII, Section 9.1.3.; test method: EU C.1./OECD TG 203).

The reasons for the decision(s) are explained in Appendix 1.

Information required depends on your tonnage band

You must provide the information listed above for all REACH Annexes applicable to you in accordance with Articles 10(a) and 12(1) of REACH. The addressees of the decision and their corresponding information requirements based on registered tonnage band are listed in Appendix 3.

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

How to comply with your information requirements

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

You must follow the general requirements for testing and reporting new tests under REACH, see Appendix 4.

Appeal

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

Failure to comply

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

Authorised[1] under the authority of Mike Rasenberg, Director of Hazard Assessment

Appendix 1: Reasons for the decision
Appendix 2: Procedure
Appendix 3: Addressees of the decision and their individual information requirements
Appendix 4: Conducting and reporting new tests under REACH

[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 1: Reasons for the decision

Contents

0. Reasons common to several requests

0.1. Assessment of the read-across approach

1 You have adapted the following standard information requirements by using grouping and read-across approach under Annex XI, Section 1.5, by providing information derived from experimental data from groups of substances using the OECD QSAR Toolbox:

- In vitro cytogenicity study in mammalian cells or in vitro micronucleus study (Annex VIII, Section 8.4.2.);
- Short-term repeated dose toxicity (28 day), (Annex VIII, Section 8.6.1.).

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

3 Annex XI, Section 1.5. specifies two conditions which must be fulfilled whenever a read-across approach is used. Firstly, there needs to be structural similarity between substances which results in a likelihood that the substances have similar physicochemical, toxicological and ecotoxicological properties so that the substances may be considered as a group or category. Secondly, it is required that the relevant properties of a substance within the group may be predicted from data for reference substance(s) within the group.

4 Additional information on what is necessary when justifying a read-across approach can be found in the Guidance on IRs and CSA, Chapter R.6. and related documents (RAAF, 2017; RAAF UVCB, 2017).

0.1.1. Scope of the grouping of substances (category)

5 You have provided "OECD Toolbox studies", i.e. automated reports generated from the OECD QSAR Toolbox software, in IUCLID Section 13.2, which we understand are the read-across justification documents provided separately for each information requirement.

6 You define the applicability domain of the categories based on general structural and mechanistic criteria (referential boundaries), and logKow ranges (parametric boundaries).

7 We have identified the following issue(s) with the proposed scope of each of your grouping approaches:

0.1.1.1. Applicability domain of the category

8 A category (grouping) hypothesis should address "the set of inclusion and/or exclusion rules that identify the ranges of values within which reliable estimations can be made for category members for the given endpoint" (Guidance on IRs and CSA, Section R.6.2.4.1.). Particularly, "the applicability domain of a (sub)category would identify the structural requirements and ranges of physico-chemical, environmental fate, toxicological or ecotoxicological properties within which reliable estimations can be made for the (sub)category members" (Guidance on IRs and CSA, Section R.6.2.1.2.). Therefore, to reliably predict properties within a category the applicability domain should be described including the borders of the category, for which chemicals the category does not hold and a justification for the inclusion and/or exclusion rules.

9 You describe the applicability domains of the groupings based on substance type classification by general mechanistic and structural criteria, and log Kow boundaries.

10 These criteria document the selection of the source substances but do not introduce unambiguous inclusion/exclusion criteria which would identify the structural requirements

and ranges of physico-chemical, environmental fate, toxicological or ecotoxicological properties within which reliable estimations can be made for the (sub)category members.

0.1.2. Predictions for toxicological properties

11 You have provided predictions based on information on 5 or 3 category members, for the endpoint of chromosomal aberration and oral repeated dose toxicity, respectively. You have indicated general structural and mechanistic criteria for selecting the source substances and consider that it provides basis for predicting the properties of the Substance.

12 ECHA understands that you predict the properties of the Substance using a read-across hypothesis which assumes that different compounds have the same type of effects. You indicate that the properties of your Substance are predicted by taking the "highest mode" or calculating the average from the 5 or 3 category members.

13 You intend to predict the properties of the Substance from groups of source substances identified in the respective category justification documents. While the selection of source substances are different for the different predicted properties, we have identified the following issue(s) with the prediction(s) of (eco)toxicological properties:

0.1.2.1. Inadequate read-across hypothesis

14 A read-across hypothesis must be provided, establishing why a prediction for a toxicological or ecotoxicological property is reliable. Firstly, this hypothesis should be based on recognition of the structural similarities and differences between the substances (Guidance on IRs and CSA, Section R.6.). Secondly, it should explain why the differences in the chemical structures should not influence the toxicological properties or should do so in a regular pattern, taking into account that variations in chemical structure can affect both toxicokinetics (uptake and bioavailability) and toxicodynamics (e.g. interactions with receptors and enzymes) of substances (Guidance on IRs and CSA, Section R.6.2.1.3).

15 Your read-across hypothesis is only based on the structural similarity between category members, which you consider a sufficient basis for predicting the properties of the Substance. However, your hypothesis does not explain why the structural differences between the substances do not influence the toxicological properties or do so in a regular pattern.

16 While structural similarity is a prerequisite for applying the grouping and read-across approach, it does not necessarily lead to predictable or similar toxicological properties. You have not provided a well-founded hypothesis to establish a reliable prediction for a toxicological property, explaining why the structural differences do not influence toxicokinetics and toxicodynamics of the substances.

0.1.2.2. Predictions for no observed (adverse) effect level (NO(A)EL)

17 In addition, Annex XI, Section 1.5. requires that the relevant properties (i.e. key parameters foreseen to be investigated in corresponding test methods) of a substance within the group may be predicted from data for reference substance(s) within the group.

18 When conducting a hazard and risk assessment based on read-across, all results of a study conducted with the source substance are read across to the target substance. These results thereafter form the basis for establishing the no observed (adverse) effect level (NO(A)EL) for the target substance.

19 In order to have a reliable prediction using multiple source substances, the NO(A)ELs need to be based on the same key parameters. Furthermore, it is important to ensure that the read-across prediction is well founded and that the prediction accounts for the uncertainty in the approach. In cases, where there are multiple source substances, and consequently a

range of possible NO(A)EL values available to read-across, the use of the most conservative (lowest) value may be sufficient to account for the uncertainty in the read-across (Guidance on IRs and CSA, Section R.6.2.2).

20 For the endpoint of short-term repeated dose toxicity (28 day) you provide a list of NOAEL values for the source substances, and a prediction for the NOAEL of the Substance based on the category members using read-across and calculating an average from 3 nearest neighbours.

21 No information on the type of toxicity forming the basis for establishing the NOAELs are provided for any of the source substancs. Therefore, ECHA cannot verify that the predicted NOAEL is based on the same key parameter(s). In addition, you have not selected the most conservative NOAEL or provided a justification on why the Substance is expected be less potent than the calculated average from the 3 nearest neighbours. Therefore, the selection of NOAEL for the read-across from the source substances to the Substance is not justified, and the uncertainty in the approach for predictions has not been considered.

0.1.2.3. Missing robust study summaries

22 Under Annex XI, Section 1.5., the results to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3). In order to make an independent assessment of a key study, a robust study summary must be provided (Guidance on IRs and CSA, Section R.6.2.6; Art. 3(28) and 10(a)(vii) and Annex I, Section 1.1.4 and 3.1.5 of REACH).

23 A robust study summary must provide a detailed summary of the objectives, methods, results and conclusions of a full study report providing sufficient information to make an independent assessment of the study (Article 3(28)).

24 In the justification documents you have identified the effect estimates for the source substances that you intend to use in your read-across approach. However, you have not provided robust study summaries for any of the studies with the source substances used to derive your predictions.

25 You have not provided detailed information on the methods, results and conclusions, allowing for an independent assessment of the studies. In the absence of such information, the studies on the source substances cannot be considered to provide an adequate and reliable coverage of the key parameters foreseen to be investigated in a study under to the corresponding OECD TG.

0.1.3. Conclusion on the read-across approach

26 For the reasons above, you have not established that relevant properties of the Substance can be predicted from data on the source substance(s). Your read-across approach under Annex XI, Section 1.5. is rejected.

Reasons related to the information under Annex VII of REACH

1. In vitro gene mutation study in bacteria

27 An in vitro gene mutation study in bacteria is an information requirement under Annex VII to REACH (Section 8.4.1.).

1.1. Information provided

28 You have provided a bacterial reverse mutation assay (1983) with the Substance.

1.2. Assessment of the information provided

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

1.2.1. Study not adequate for the information requirement

30 To fulfil the information requirement, the study must meet the requirements of OECD TG 471 (2020). Therefore, the following specifications must be met:

a) The test must be performed with 5 strains: four strains of *S. typhimurium* (TA98; TA100; TA1535; TA1537 or TA97a or TA97) and one strain which is either *S. typhimurium* TA102 or *E. coli* WP2 uvrA or *E. coli* WP2 uvrA (pKM101).
b) The maximum dose tested must induce a reduction in the number of revertant colonies per plate compared to the negative control, or the precipitation of the tested substance. If no precipitate or limiting cytotoxicity is observed, the highest test dose must correspond to 5 mg/plate or 5 µl/plate.
c) At least 5 doses must be evaluated, in each test condition.
d) Triplicate plating must be used at each dose level.
e) One positive control must be included in the study. The positive control substance must produce a statistically significant increase in the number of revertant colonies per plate compared with the concurrent negative control.
f) The number of revertant colonies per plate for the concurrent negative control must be inside the historical control range of the laboratory.
g) The mean number of revertant colonies per plate must be reported for the treated doses and the controls.

31 The study provided is described as a bacterial reverse mutation assay. However, the following specifications are not according to the requirements of the OECD TG 471 (2020):

a) There are no test results for all the appropriate 5 strains, that is for the required fifth strain, *S. typhimurium* TA102 or *E. coli* WP2 uvrA or *E. coli* WP2 uvrA (pKM101).

b) A maximum dose of 500 microgram/plate was used, not the recommeded highest test dose, a limiting cytotoxicity or precipitation is not reported.

It is not reported:

c) whether the evaluation of at least 5 doses in each test condition was performed

d) whether in the study triplicate plating at each dose level was used,

e) whether a positive control was included, and

f) whether a negative control with a number of revertant colonies per plate inside

the historical control range of the laboratory was included.

g) Data on the number of revertant colonies per plate for the treated doses and the controls is not reported.

32 The information provided does not cover several of the key parameters required by the OECD TG 471.

33 On this basis, the information requirement is not fulfilled.

1.3. Specification of the study design

34 To fulfil the information requirement for the Substance, the in vitro gene mutation study in bacteria (OECD TG 471, 2020) is considered suitable.

2. Short-term toxicity testing on aquatic invertebrates

35 Short-term toxicity testing on aquatic invertebrates is an information requirement under Annex VII to REACH (Section 9.1.1.).

2.1. Information provided

36 You have provided the following information: a study on the Substance according to the OECD TG 202 (Eunju Kim et al, 2012). Under Section 13.2 of your IUCLID dossier you have also provided a PowerPoint presentataion named "[redacted]" in which you have provided additional information on the performed study.

2.2. Assessment of the information provided

37 We have assessed this information and identified the following issues:

2.2.1. The provided study does not meet the information requirement

38 To fulfil the information requirement, a study must comply with the OECD TG 202 (Article 13(3) of REACH). Therefore, the following specifications must be met:

39 Technical specifications impacting the sensitivity/reliability of the test

a) young daphnids, aged less than 24 hours at the start of the test, are used;
b) test animals are not fed during the test;

40 Characterisation of exposure

c) the effect values can only be based on nominal or measured initial concentration if the concentration of the test material has been satisfactorily maintained within 20 % of the nominal or measured initial concentration throughout the test (see also Guidance on IRs and CSA, Section R.7.8.4.1);

41 Reporting of the methodology and results

d) adequate information on the analytical method (including performance parameters of the method) and on the results of the analytical determination of exposure concentrations is provided.

42 Your registration dossier provides an OECD TG 202 study showing the following:

43 Technical specifications impacting the sensitivity/reliability of the test

a) The age of the tested animals is not provided.
b) Feeding information is not provided.

44 Characterisation of exposure

c) Nominal and measured effect values are indicated i.e. an EC50 of 7.86 mg/L and an EC50 of 5.66 mg/L (nominal and measured respectively). You conclude using the nominal concentration i.e. EC50 of 7.86 mg/L as the key effect value for the CSA.

45 Reporting of the methodology and results

d) On the analytical method, in your dossier no information on the analytical method is provided (i.e. methodology, performance parameters). The results of the analytically determined exposure concentrations are not provided.

46 Based on the above, there are critical methodological deficiencies resulting in the rejection of the study results. More specifically, regarding the age and the feeding of the tested animals, as you have not provided any information, it cannot be verified whether the study was conducted according to the OECD TG 202 requirements. On the analytical method, you indicate the nominal concentration (i.e. EC50 of 7.86 mg/L) as the key effect value for the CSA. However as you have not provided any analytical information from the test, it cannot be verified that the concentration of the Substance has been satisfactorily maintained within 20 % of the nominal or measured initial concentration throughout the test. Therefore ECHA is not in a position to assess the reliability of the effect value provided.

47 Therefore, the requirements of the OECD TG 202 are not met. On this basis, the information requirement is not fulfilled.

3. Ready biodegradability

48 Ready biodegradability is an information requirement in Annex VII to REACH (Section 9.2.1.1.).

3.1. Information provided

49 You have provided a QSAR prediction to predict the ready biodegradability of the Substance. Under Section 13.2 of your IUCLID dossier, you have also provided a document named a "[redacted]" in which you specify the methodology used to predict the ready biodegradability of the Substance.

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

3.2. Assessment of your (Q)SAR adaptation

51 Annex XI, Section 1.3. specifies that the following conditions must be fulfilled whenever a (Q)SAR approach is used:

1. the prediction needs to be derived from a scientifically valid model,
2. the substance must fall within the applicability domain of the model,
3. results need to be adequate for the purpose of risk assessment or classification and labelling, and
4. adequate and reliable documentation of the method must be provided.

52 With regard to these conditions, we have identified the following issue(s):

3.2.1. Modelled endpoint not well defined

53 Under ECHA Guidance R.6.1.3., a (Q)SAR model must fulfil the principles described in the OECD Guidance document on the validation of (Q)SAR models (ENV/JM/MONO(2007)2) to be considered scientifically valid. The first OECD principle requires the endpoint of a (Q)SAR

model to be well defined. The ECHA Guidance R.6.1.5.2 specifies that for a well-defined endpoint the effect modelled being predicted by the (Q)SAR must be the same as the effect measured by a defined test protocol relevant to the information requirement, which in this case includes the ultimate aerobic biodegradation (as measured by parameters such as DOC removal, CO2 production and oxygen uptake) of the test material under low inoculum concentration (OECD TG 301 or TG 310).

54 You specify that the effect that is modelled is the half-life in water.

55 You have provided a (Q)SAR model BIOWIN V4.10 in Epiweb 4.1 which is based on data generated using the following methodology : A Mackay level III fugacity models that gives a half-life estimation (HL) in the water compartment (i.e. 360 hours). On this basis you conclude that the Substance is inherently biodegradable.

56 The endpoint predicted by the (Q)SAR (i.e. half-life in water) is not the same as the ultimate aerobic biodegradation measured in a study according to the OECD TG 301 and the OECD TG 310.

57 Therefore the endpoint of the model is not well defined and you have not established that the use of this model is a scientifically valid approach to meet this information requirement.

58 Therefore, the information requirement is not fulfilled.

Reasons related to the information under Annex VIII of REACH

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

59 An in vitro cytogenicity study in mammalian cells or an in vitro micro-nucleus study is an information requirement under Annex VIII to REACH (Section 8.4.2.).

4.1. Information provided

60 You have adapted this information requirement by using Column 2 of Annex VIII, Section 8.4.2. To support the adaptation, you have provided an OECD QSAR Toolbox version 3.2.0.103 category prediction for in vivo micronucleus test (2014).

4.2. Assessment of the information provided

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

4.2.1. Column 2 adaptation criteria not met

62 Under Section 8.4.2., column 2 of Annex VIII to REACH, the study usually does not need to be conducted "if adequate data from an in vivo cytogenicity test are available". The Guidance on IRs and CSA, Section R.7.7.6.3 and Table R.7.7–3 clarifies that the in vivo somatic cell cytogenicity test must be either a micronucleus test or a chromosomal aberration test, performed according to the OECD TG 474 or 475, respectively.

63 For the data from an in vivo somatic cell cytogenicity test to be considered adequate, the in vivo study has to meet the requirements of the OECD TG 474/475.

64 The study provided is described as a read-across prediction from a mammalian erythrocyte micronucleus test.

65 As explained in Section 0.1, your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5 is rejected.

66 As a consequence, there are no adequate criteria for adapting the information under Section 8.4.2., Column 2 of Annex VIII.

67 On this basis, the information requirement is not fulfilled.

4.3. Specification of the study design

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

5. In vitro gene mutation study in mammalian cells

69 An in vitro gene mutation study in mammalian cells is an information requirement under Annex VIII to REACH (Section 8.4.3.) in case of a negative result in the in vitro gene mutation test in bacteria and the in vitro cytogenicity test.

70 You have not submitted any information on in vitro gene mutation study in mammalian cells.

71 Your dossier contains data for an in vitro gene mutation study in bacteria, and an adaptation for an in vitro cytogenicity study in mammalian cells or in vitro micronucleus study. However

the information for the in vitro gene mutation study in bacteria and for the micronucleus study provided in the dossier are rejected for the reasons provided in sections 1 and 4 above.

72 The results of the requests for an in vitro gene mutation study in bacteria and for an in vitro cytogenicity study in mammalian cells or in vitro micronucleus study will determine whether the requirement for an in vitro mammalian cell gene mutation study in accordance with Annex VIII, Section 8.4.3 is triggered.

73 You are required to provide information for this endpoint, if the in vitro gene mutation study in bacteria and the in vitro cytogenicity study in mammalian cells or an in vitro micronucleus study provide a negative result.

74 The deadline for provision of the information set by this decision allows sequential testing, where required.

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

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

76 A short-term repeated dose toxicity study (28 days) is an information requirement under Annex VIII to REACH (Section 8.6.1.).

6.1. Information provided

77 You have adapted this information requirement by using a Grouping of substances and read-across approach based on the OECD QSAR Toolbox version 3.2.0.103 category prediction for repeated dose toxicity (oral) (2014).

6.2. Assessment of the information provided

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

79 As explained in Section 0.1, your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5 is rejected.

80 On this basis, the information requirement is not fulfilled.

6.3. Specification of the study design

81 When there is no information available neither for the 28-day repeated dose toxicity endpoint (EU B.7, OECD TG 407), nor for the screening study for reproductive/developmental toxicity (OECD TG 421 or TG 422), the conduct of a combined repeated dose toxicity study with the reproduction/developmental toxicity screening test (OECD TG 422) is preferred to ensure that unnecessary animal testing is avoided. Such an approach offers the possibility to avoid carrying out a 28-day study according to OECD TG 407, because the OECD TG 422 can at the same time fulfil the information requirement of REACH Annex VIII, 8.6.1 and that of REACH Annex VIII, 8.7.1. (Guidance on IRs and CSA, Section R.7.6.2.3.2.).

82 For information on the study design see request for OECD TG 422 below.

7. Screening for reproductive/developmental toxicity

83 A screening for reproductive/developmental toxicity study (OECD 421 or OECD 422) is an information requirement under Annex VIII to REACH (Section 8.7.1.), if there is no evidence

from analogue substances, QSAR or in vitro methods that the substance may be a developmental toxicant.

7.1. Information provided

84 You have provided information from a review article (2012)[2] on uterotrophic assays with the Substance.

7.2. Assessment of the information provided

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

7.2.1. Study not adequate for the information requirement

86 (Eco)toxicological studies must comply with a recognised test method (Art. 13(3) of REACH), in this case the EU B.63/OECD TG 421 or EU B.64/OECD TG 422. Such study must cover the key parameters of the corresponding OECD test guideline (Art. 13(3) of REACH). Therefore, the following specifications must be met:

a. an exposure duration of at least four weeks for males, including a minimum of two weeks prior to mating, and approx. 63 days for females to cover premating, conception, pregnancy and at least 13 days of lactation

b. examination of parameters for sexual function and fertility such as those for mating and fertility, duration of gestation and parturition and weight and histopathology of reproductive organs and tissues

c. examination of offspring parameters such as number and sex of pups, stillbirths and live births, gross abnormalities, litter weight, anogenital distance, number of nipples/areolae in male pups.

87 The source of the information that you have provided is described as a "review article". It refers to four uterotrophic assays in rats performed with the Substance. The assays do not cover the key parameters of the EU B.63/OECD TG 421 or EU B.64/OECD TG 422 such as:

a. exposure duration and sex of the test models: the information provided was obtained from female rats only, and the exposure duration (oral gavage, subcutaneous injections or intraperitoneal doses) is given as three days only.

b. information on parameters for sexual function and fertility: only the effect of increased uterine weight is reported. These assays do not inform on the other parameters on sexual function and fertility investigated in the OECD TGs 421/422.

c. examination of offspring parameters: no information on offspring parameters is obtained from the information provided.

88 The information from the review article included in your technical dossier is not adequate for the information requirement and is therefore rejected.

89 On this basis, the information requirement is not fulfilled.

7.3. Specification of the study design

[2] review article: Danish Centre on Endocrine Disrupters (2012) Evaluation of 22 SIN List 2.0 substances according to the Danish proposal on criteria for endocrine disruptors, pp 47-49

90 A study according to the test method EU B.64/OECD TG 422 must be performed in rats.

91 The study must be conducted with oral administration of the Substance (Guidance on IRs and CSA, Section R.7.6.2.3.2.).

8. Short-term toxicity testing on fish

92 Short-term toxicity testing on fish is an information requirement under Annex VIII to REACH (Section 9.1.3.).

8.1. Information provided

93 You have provided a study on the Substance according to the OECD TG 203 (Eunju Kim et al, 2012). You have also provided in your registration dossier (IUCLID, Section 13.2) a PowerPoint presentataion named "[redacted] in which you have provided an additional information on the performed study.

8.2. Assessment of the information provided

94 We have assessed this information and identified the following issues:

8.2.1. The provided study does not meet the information requirement

95 To fulfil the information requirement, a study must comply with OECD TG 203 (Article 13(3) of REACH). Therefore, the following specifications must be met:

96 Technical specifications impacting the sensitivity/reliability of the test

a) the test is conducted on juveniles of similar age (or size).

97 Reporting of the methodology and results

b) adequate information on the analytical method (including performance parameters of the method) and on the results of the analytical determination of exposure concentrations are provided.

98 Your registration dossier provides an OECD TG 203 showing the following:

99 Technical specifications impacting the sensitivity/reliability of the test

a) the age (or size) of the tested animals is not provided.

100 Reporting of the methodology and results

b) on the analytical method, adequate information, i.e. performance parameters of the method (e.g. LOQ, LOD) is not reported.

101 Based on the above, there are critical methodological deficiencies resulting in the rejection of the study results. More, specifically, regarding the age (or size) of the tested animals, as you have not provided any information it cannot be verified whether the study was conducted according to the OECD TG 203 requierements. On the analytical method, as relevant information is missing, ECHA is not in a position to assess the reliability of the effect value provided.

102 On this basis, the information requirement is not fulfilled.

References

The following documents may have been cited in the decision.

Guidance on information requirements and chemical safety assessment (Guidance on IRs & CSA)

Chapter R.4 Evaluation of available information; ECHA (2011).
Chapter R.6 QSARs, read-across and grouping; ECHA (2008).
Appendix to Chapter R.6 for nanoforms; ECHA (2019).
Chapter R.7a Endpoint specific guidance, Sections R.7.1 – R.7.7; ECHA (2017).
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).
Chapter R.7b Endpoint specific guidance, Sections R.7.8 – R.7.9; ECHA (2017).
Appendix to Chapter R.7b for nanomaterials; ECHA (2017).
Chapter R.7c Endpoint specific guidance, Sections R.7.10 – R.7.13; (ECHA 2017).
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).
Appendix R.7.13-2 Environmental risk assessment for metals and metal compounds; ECHA (2008).
Chapter R.11 PBT/vPvB assessment; ECHA (2017).
Chapter R.16 Environmental exposure assessment; ECHA (2016).

Guidance on data-sharing; ECHA (2017).

All Guidance on REACH is available online: https://echa.europa.eu/guidance-documents/guidance-on-reach

Read-across assessment framework (RAAF)

RAAF, 2017 Read-across assessment framework (RAAF), ECHA (2017)
RAAF UVCB, 2017 Read-across assessment framework (RAAF) – considerations on multi- constituent substances and UVCBs), ECHA (2017).

The RAAF and related documents are available online:
https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across

***OECD Guidance documents* (OECD GDs)**

OECD GD 23 Guidance document on aquatic toxicity testing of difficult substances and mixtures; No. 23 in the OECD series on testing and assessment, OECD (2019).
OECD GD 29 Guidance document on transformation/dissolution of metals and metal compounds in aqueous media; No. 29 in the OECD series on testing and assessment, OECD (2002).
OECD GD 150 Revised guidance document 150 on standardised test guidelines for evaluating chemicals for endocrine disruption; No. 150 in the OECD series on testing and assessment, OECD (2018).
OECD GD 151 Guidance document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test; No. 151 in the OECD series on testing and assessment, OECD (2013).

Appendix 2: Procedure

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

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

The compliance check was initiated on 25 January 2021.

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.

Appendix 3: Addressees of this decision and their corresponding information requirements

In accordance with Articles 10(a) and 12(1) of REACH, the information requirements for individual registrations are defined as follows:

- the information specified in Annex VII to REACH, for registration at 1-10 tonnes per year (tpa), or as a transported isolated intermediate in quantity above 1000 tpa;
- the information specified in Annexes VII and VIII to REACH, for registration at 10-100 tpa.

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

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

Appendix 4: Conducting and reporting new tests for REACH purposes

1. Requirements when conducting and reporting new tests for REACH purposes

1.1. Test methods, GLP requirements and reporting

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

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

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

1.2. Test material

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

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

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

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

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers[4].

[3] https://echa.europa.eu/practical-guides
[4] https://echa.europa.eu/manuals