~~Confidential~~

Helsinki, 16 November 2023

Addressee(s)
Registrant(s) of JS_31570-04-4 as listed in Appendix 3 of this decision

Date of submission of the dossier subject to this decision
18/10/2022

Registered substance subject to this decision ("the Substance")
Substance name: Tris(2,4-ditert-butylphenyl) phosphite
EC number/List number: 250-709-6

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 ***21 August 2025***.

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: Bacterial reverse mutation test, EU B. 13/14./OECD TG 471 (2020)).

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

2. In vitro mammalian micronucleus study (Annex VIII, Section 8.4.2., test method: EU B.49./ OECD TG 487). The aneugenic potential of the Substance must be assessed with an additional control group for aneugenicity on top of the control group for clastogenicity, if the Substance induces an increase in the frequency of micronuclei;

3. If a negative results in Annex VII, Section 8.4.1. and in Annex VIII, Section 8.4.2 are obtained, *in vitro* gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method: EU B.17./OECD TG 476 or EU B.67./OECD TG 490).

The reasons for the request(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 request(s)
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 request(s)

Contents

Reasons related to the information under Annex VII of REACH

1. *In vitro* gene mutation study in bacteria

1 An in vitro gene mutation study in bacteria is an information requirement under Annex VII, Section 8.4.1.

1.1. Information provided

2 You have provided:

(i) an *in vitro* gene mutation study in bacteria (1978) with the Substance;

(ii) an *in vitro* genetic toxicity study in *Saccharomyces Cerevisiae* (1982) with the Substance.

1.2. Assessment of the information provided

1.2.1. Study (ii) not adequate for the information requirement

3 (Eco)toxicological studies must comply with a recognised test method (Article 13(3) of REACH), in this case OECD TG 471. Such study must cover the key parameters of the corresponding OECD test guideline (Article 13(3) of REACH).

4 The study (ii) is described as an *in vitro* genetic toxicity study in Saccharomyces Cerevisiae. This study has been conducted using yeast instead of bacteria.

5 The information provided does not cover key parameter(s) required by the OECD TG 471.

6 Based on the above, the study (ii) is not adequate for the information requirement.

1.2.2. The provided study (i) does not meet the specifications of the test guideline(s)

7 To fulfil the information requirement, a study must comply with OECD TG 471 (Article 13(3) of REACH). Therefore, the following specifications must be met:

a) the test is 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 induces 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 corresponds to 5 mg/plate or 5 µl/plate;

c) negative results are confirmed in a repeat experiment with modification of study parameters to extend the range of conditions assessed, or a justification why confirmation of negative results is not considered necessary is provided.

8 In study(i):

a) the test was performed with the strains TA 1535, TA 1537, TA 98 and TA 100 i.e., the strain S. typhimurium TA102 or E. coli WP2 uvrA or E. coli WP2 uvrA (pKM101) is missing;

b) the maximum dose tested did not induce a reduction in the number of revertant colonies per plate compared to the negative control, or the precipitation of the tested substance as cytotoxicity or precipitation was not reported and the

maximum dose tested was less than 5 mg/plate or 5 µl/plate (maximum dose tested reported as 81 µg per plate);

c) no repeat experiment was performed to confirm the negative results and no justification was provided.

9 The information provided does not cover the specification(s) required by the OECD TG 471.

10 Based on above, the information requirement is not fulfilled.

1.3. Specification of the study design

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

12 In the comments to the draft decision you agree with the request.

Reasons related to the information under Annex VIII of REACH

2. *In vitro* micronucleus study

13 An *in vitro* mammalian chromosomal aberration study or *in vitro* mammalian micronucleus study is an information requirement under Annex VIII, Section 8.4.2.

2.1. Information provided

14 You have adapted this information requirement by using Annex VIII, Section 8.4., Column 2. To support the adaptation, you have provided the following information:

(i) Justification that "*an in vitro cytogenicity study in mammalian cells or in vitro micronucleus study does not need to be conducted because adequate data from an in vivo cytogenicity test are available*";

(ii) Mammalian Erythrocyte Micronucleus Test with the Substance (1980);

(iii) Mammalian Bone Marrow Chromosome Aberration Test with the Substance (1982);

(iv) Mammalian Spermatogonial Chromosome Aberration Test with the Substance (1982; study [redacted]);

(v) Mammalian Spermatogonial Chromosome Aberration Test with the Substance (1982; study [redacted]);

(vi) Mammalian germ cell study, Rodent dominant lethal assay with the Substance; and

(vii) Sister chromatid exchange assay with the Substance.

2.2. Assessment of the information provided

2.2.1. Study (vii) is neither a micronucleus test nor a chromosomal aberration test

15 Under Annex VIII, Section 8.4., Column 2, the study referred to in Annex VIII, Section 8.4.2, does not need to be conducted if adequate data from an *in vivo* micronucleus or *in vivo* chromosomal aberration study are available. The Guidance on IRs and CSA, Section R.7.7.6.3 and Table R.7.7–3, clarifies that such *in vivo* somatic cell study must be performed according to the OECD TG 474 or 475.

16 The study (vii) is described as a sister chromatid exchange assay in bone marrow cells.

17 This study is neither a micronucleus test nor a chromosomal aberration test.

2.2.2. Study (ii) does not cover the specification(s) required by the OECD TG 474

18 Under Annex VIII, Section 8.4., Column 2, the study referred to in Annex VIII, Section 8.4.2, does not need to be conducted if adequate data from an *in vivo* micronucleus or *in vivo* chromosomal aberration study are available. The Guidance on IRs and CSA, Section R.7.7.6.3 and Table R.7.7–3, clarifies that such *in vivo* somatic cell study must be performed according to the OECD TG 474 or 475.

19 For the data from an *in vivo* somatic cell micronucleus study to be considered adequate, the in vivo study you submitted has to meet the requirements of the OECD TG 474. Therefore, the following specifications must be met:

a) at least 4000 immature erythrocytes per animal are scored for the incidence of micronucleated immature erythrocytes;

b) a clear negative outcome is concluded when the data available shows that bone marrow exposure to the Substance or its metabolite(s) occurred;

c) The scientific justification for using species other than rats and mice should be provided.

20 In study (ii):

a) 1000 bone marrow cells (no distinction between immature and mature erythrocytes) per animal (i.e. less than 4000 immature erythrocytes) were scored to determine the incidence of micronucleated immature erythrocytes;

b) you did not demonstrate that bone marrow exposure to the Substance, or its metabolite(s), occurred/there is evidence that the Substance, or a relevant metabolite, will not reach the target tissue; and

c) the test was performed in the hamster and no justification for deviating from the recommended species is provided.

The information provided does not cover the specification(s) required by the OECD TG 474.

2.2.3. Study (iii) does not cover the specification(s) required by the OECD TG 475

22 Under Annex VIII, Section 8.4., Column 2, the study referred to in Annex VIII, Section 8.4.2, does not need to be conducted if adequate data from an in vivo micronucleus or in vivo chromosomal aberration study are available. The Guidance on IRs and CSA, Section R.7.7.6.3 and Table R.7.7–3, clarifies that such in vivo somatic cell study must be performed according to the OECD TG 474 or 475.

23 For the data from an *in vivo* chromosome aberration study to be considered adequate, the in vivo study you submitted has to meet the requirements of the OECD TG 475. Therefore, the following specifications must be met:

a) each group includes a minimum of 5 analysable animals;

b) the mitotic index is determined as a measure of cytotoxicity in at least 1000 cells per animal for all treated animals (including positive controls), and negative control animals;

c) at least 200 metaphases are analysed for each animal for structural chromosomal aberrations including and excluding gaps;

d) a clear negative outcome is concluded when the data available shows that bone marrow exposure to the Substance, or its metabolite(s), occurred.

24 In study (iii):

a) each group did not include a minimum of 5 animals of one sex or of each sex if both are used, per group as groups of 2 animals per sex were reported;

b) no information is provided of the number of cells counted for each treated animals (including positive controls), untreated or negative control animals;

c) no information is provided of the number of metaphases analysed for each animal for structural chromosomal aberrations including and excluding gaps;

d) you did not demonstrate that bone marrow exposure to the Substance, or its metabolite(s), occurred/there is evidence that the Substance, or a relevant metabolite, will not reach the target tissue.

25 The information provided does not cover the specification(s) required by the OECD TG 475.

2.2.4. Studies (iv-vi) are not somatic cell in vivo studies

26 Under Annex VIII, Section 8.4., Column 2, the study referred to in Annex VIII, Section 8.4.2, does not need to be conducted if adequate data from an *in vivo* micronucleus or in vivo chromosomal aberration study are available. The Guidance on IRs and CSA, Section R.7.7.6.3 and Table R.7.7–3, clarifies that such *in vivo* somatic cell study must be performed according to the OECD TG 474 or 475.

27 The studies (iv) and (v) are described as *in vivo* germ cell studies, mammalian spermatogonial chromosomal aberration tests (OECD TG 483) and study (vi) is described as *in vivo* germ cell study, rodent dominant lethal assay (OECD TG 478).

28 The studies (iv-vi) are performed on germ cells. The OECD TG 483 detects chromosomal aberrations in spermatogonial mitoses while the dominant lethal mutations detected by the OECD TG 478 are generally the result of structural and/or numerical chromosomal aberrations.

29 The results in germ cells cannot be used for the first level of investigation of genotoxicity in somatic cells. A negative result from the *in vivo* study concucted in germ cells cannot be used to conclude that the Substance would also be negative in the somatic cells, and therefore, is not sufficient to conclude on classification as germ cell mutagen, i.e. category 2. *In vivo* data obtained on somatic cells is necessary for this purpose.

30 Therefore, the studies (iv-vi) in germ cells are not adequate first level *in vivo* studies.

2.2.5. Conclusion on Annex VIII, Section 8.4.2., Column 2 adaptation

31 Based on the above, you have not provided adequate data from the corresponding *in vivo* study, namely *in vivo* chromosomal aberration (or micronucleus) study and your adaptation is rejected.

32 Therefore, the information requirement is not fulfilled.

2.3. Information provided in your comments on the draft decision

33 In your comments you have acknowledged the deficiencies of the individual studies and you have indicated that these deficiencies can be addressed if the set of information provided is considered together, in a weight of evidence adaptation according to Annex XI, Section 1.2.

Furthermore, in your comments on the draft decision you refer to the following additional information:

(viii)In vitro chromosome aberration study with the analogue substance bis(2,4-di-tert-butyl-6-methylphenyl)ethyl phosphate (CAS 145650-60-8).

34 You consider that "*in vivo data on the substance itself conducted in hamsters shows that in both an in vivo micronucleus assay as well as an in vivo chromosomal aberration assay in bone marrow, no genotoxicity was observed. Both assays show limitations as compared to the current guideline with regard to e.g. number of cells analyzed, however based on the information provided above, it is unlikely that higher cell numbers would lead to a statistically different outcome of the assays. Systemic exposure (including blood and thus also bone marrow) can be deduced from available toxicokinetic information and the species hamster is considered adequately justified. Further support for a lack of cytogenicity by the*

substance in vivo is provided with two negative chromosomal aberration tests conducted in spermatogonial tissue and a negative dominant lethal assay (all three germ cell assays were conducted in mouse). While these tests constitute germ cell investigations and not somatic cell assays, they nevertheless support the lack of clastogenicity by the test substance. In addition, a sister chromatid exchange assay on the substance also provided negative results, thus further underlining the lack of clastogenic activity. Taken together and evaluated in a weight-of-evidence, there is no concern for clastogenicity for the registered substance.

35 *Further support for this is derived from a structurally similar substance (CAS 145650-60-8), for which a negative in vitro chromosome aberration test according to OECD Guideline 473 and under GLP is available.*

36 *Overall, the data is considered sufficient to cover the data gap according to Annex VIII and conduct of a further in vitro micronucleus test is considered disproportionate given the data available"Assessment of the information provided".*

2.3.1. Assessment of the information provided in your comments

37 Annex XI, Section 1.2. states that there may be sufficient weight of evidence from several independent sources of information enabling, through a reasoned justification, a conclusion on the information requirement, while the information from each single source alone is insufficient to fulfil the information requirement.

38 The justification must have regard to the information that would otherwise be obtained from the study that must normally be performed for this information requirement.

39 According to ECHA Guidance R.4, a weight of evidence adaptation involves an assessment of the relative values/weights of the different sources of information submitted. The weight given is based on the reliability of the data, consistency of results/data, nature and severity of effects, and relevance and coverage of the information for the given regulatory information requirement. Subsequently, relevance, reliability, coverage, consistency and results of these sources of information must be balanced in order to decide whether they together provide sufficient weight to conclude on the corresponding information requirement.

40 Information that can be used to support weight of evidence adaptation for the information requirement of Annex VIII, Section 8.4.2. includes similar information that is produced by the OECD TG 473 (in vitro) or the OECD TG 474 or 475 (in vivo). These OECD TGs require the study to investigate the following key parameter(s):

a. Detection and quantification of cytotoxicity and the frequency of cells with structural chromosomal aberration(s) in cultured mammalian cells (*in vitro*) or in target tissues (somatic cells) after administration to rodents *(in vivo*).

41 The sources of information (ii) and (iii) provide relevant information on the detection and quantification of cytotoxicity and the frequency of cells with structural chromosomal aberratation(s) in somatic cells of rodents.

42 The sources of information (iv) to (vi) inform on the genotoxicity of the Substance in germ cells, and therefore do not directly provide relevant information on the detection and quantification of cytotoxicity and the frequency of cells with structural chromosomal aberratation(s) in somatic cells of rodents

43 The source of information (vii) is a a sister chromatid exchange assay in bone marrow cells which informs on the reciprocal exchange of DNA between sister chromatids of a duplicating chromosome. Although the mechanism of toxicity investigated in this test guideline does not constitute the only mechanism causing structural chromosal aberrations, this study

provides relevant information on the potential of the Substance to cause structural chromosomal aberrations.

44 The source of information (viii) cannot be considered as contributing to the overall weight of evidence for the information requirement under consideration, as it is lacking robust study summary (i.e. you have not provided detailed information on the methods, results and conclusions, allowing for an independent assessment of the study), as required under Annex XI, Section 1.2.

45 As regards the reliability of the lines of information (ii) and (iii), in your comments on the draft decision, you have provided further details on the deficiencies identified by ECHA in section 2.2.above regarding the design and results obtained, in particular with regard to the number of cells scored (studies (ii) and (iii)), the number of animals used (study (iii), the animal species used (study (ii)). You have also elaborated on the relative values/weights of the different sources of information, clarifying the role of each line of information in the weight of evidence adaptation, taking into account the limitations listed by ECHA in the draft decision.

2.3.2. Conclusion on the information provided in your comments

46 The information you have provided in your comments either addresses the limitations in the individual lines of information identified above by ECHA or provides information how they are mitigated by other lines of information included in the data set, in a weight of evidence approach. ECHA agrees with your assessments of the weight of the sources of information and of the contribution of the different studies. Therefore, ECHA considers that your weight of evidence adaptation, as provided in your comments, allows to consider that there is adequate data from *in vivo* studies to adapt the information of Annex VIII, Section 8.4.2 according to Annex VIII, Section 8.4., Column 2.

47 However, as the information is currently not available in your registration dossier, the data gap remains. You should therefore submit this information in an updated registration dossier by the deadline set out in the decision.

2.4. Specification of the study design

48 According to the Guidance on IR & CSA, Section R.7.7.6.3., either the in vitro mammalian chromosomal aberration ("CA") test (test method OECD TG 473) or the in vitro mammalian cell micronucleus ("MN") test (test method OECD TG 487) can be used to investigate chromosomal aberrations in vitro.

49 However, while the MN test detects both structural chromosomal aberrations (clastogenicity) and numerical chromosomal aberrations (aneuploidy), the CA test detects only clastogenicity, as OECD TG 473 is not designed to measure aneuploidy (see OECD TG 473, paragraph 2).

50 Therefore, you must perform the MN test (test method OECD TG 487), as it enables a more comprehensive investigation of the chromosome damaging potential in vitro.

51 Moreover, in order to demonstrate the ability of the study to identify clastogens and aneugens, you must include two concurrent positive controls, one known clastogen and one known aneugen [1] (OECD TG 487, paragraphs 33 to 35).

2.4.1. Assessment of aneugenicity potential

52 If the result of the MN test is positive, i.e. your Substance induces an increase in the frequency of micronuclei, you must assess the aneugenic potential of the Substance.

53 In line with the OECD TG 487 (paragraph 4), you should use one of the centromere labelling or hybridisation procedures to determine whether the increase in the number of micronuclei

is the result of clastogenic events (i.e. micronuclei contain chromosome fragment(s)) and/or aneugenic events (i.e. micronuclei contain whole chromosome(s)).

[1] According to the TG 487 (2016) "At the present time, no aneugens are known that require metabolic activation for their genotoxic activity" (paragraph 34).

3. *In vitro* gene mutation study in mammalian cells

54 An *in vitro* gene mutation study in mammalian cells is an information requirement under Annex VIII, Section 8.4.3., in case of a negative result in the in vitro gene mutation test in bacteria and in the *in vitro* mammalian chromosomal aberration study or *in vitro* mammalian micronucleus study .

3.1. Triggering of the information requirement

55 Your dossier contains inadequate data for the *in vitro* gene mutation study in bacteria and inadequate data for the *in vitro* mammalian chromosomal aberration study or *in vitro* mammalian micronucleus study.

56 The *in vitro* gene mutation study in bacteria and the *in vitro* chromosomal aberration study or *in vitro* mammalian micronucleus study in mammalian cells provided in the dossier are rejected for the reasons provided in requests 1 and 2, respectively.

57 The result of the requests 1 and 2 will determine whether the present requirement for an *in vitro* mammalian cell gene mutation study in accordance with Annex VIII, Section 8.4.3 is triggered.

58 Consequently, you are required to provide information for this information requirement, if the *in vitro* gene mutation study in bacteria and the in vitro micronucleus study provides a negative result.

3.2. Information provided

59 You have adapted this information requirement by using Annex VIII, Section 8.4, Column 2.

60 You have provided the following justification for data waiving:

61 "*In accordance with Annex VIII (8.4.3) of the REACH legislation, a gene mutation test in mammalian cells does not need to be conducted if adequate data from a reliable in vivo gene mutation assay is available. In this case, the substance was found to be non carcinogenic in a valid study performed with rats*."

62 To support the adaptation, you have provided the following information:

(i) Combined chronic toxicity / carcinogenicity study (1980) with the Substance.

63 In addition, you provided the following supporting arguments

(ii) the Substance is not mutagenic in the Ames test;

(iii) no adverse effects were observed in the dominant lethal study in rats;

(iv) the Substance neither induces sister-chromatide-exchanges nor chromosome-aberrations in-vivo;

(v) the water solubility of the Substance is <0.005mg/l (at 20°C) and therefore, due to the sensitivity of cultivated cells to precipitates, the mutagenicity test with mammalian cells *in vitro* could only be performed with very low concentrations;

(vi) the Substance does not carry structural alerts as identified by the rules of Zeiger (Zeiger, E.; Anderson, B.; Haworth, S.; Lawlor, T.; Mortelmans, K., (1992). Salmonella mutagenicity tests: V. Results from the testing of 311 chemicals. Environ Mol Mutagen, 19 Suppl 21, 2-141.);

(vii) the Substance does not carry structural alerts as identified in the knowledge base of DEREK (Lhasa Inc.).

3.3. Assessment of the information provided

3.3.1. The provided adaptation does not meet the criteria of Annex VIII, Section 8.4., Column 2

64 Under Annex VIII, Section 8.4., Column 2, the study referred to in Annex VIII, point 8.4.3, does not need to be conducted if adequate data from an in vivo mammalian gene mutation study are available. The Guidance on IRs and CSA, Section R.7.7.6.3, clarifies that the in vivo study must be a Transgenic Rodent Somatic and Germ Cell Gene Mutation Assay (TGR), performed according to the OECD TG 488. This test investigates gene mutations using reporter genes.

65 You have provided an in vivo carcinogenicity study (i) and information from in vitro genetic toxicity study (ii), in vivo dominant lethal and sister-chromatid-exchange and chromosome aberration studies (iii, iv), physico-chemical properties (v), in silico structural alerts (vi, vii).

66 The information submitted (i-vii) are not Transgenic Rodent Somatic and Germ Cell Gene Mutation Assays, and do not investigate gene mutations in mammalian cells. Specifically,

- The carcinogenicity study (i) does not investigate gene mutations;
- The Ames test (ii) does not inform on gene mutations in mammalian cells as the information is based on bacterial cells;
- Dominant lethal mutations detected in the dominant lethal study (iii) are generally the result of structural and/or numerical chromosomal aberrations in germ cells and therefore, it is does not inform on gene mutations in somatic cells;
- The sister-chromatide-exchange and chromosome-aberration tests (iv) inform on cytogenicity of the Substance and do not investigate gene mutations;
- Source of information (v) informs on water solubility of the Substance, and does not inform on gene mutations; and
- Structural alerts (vi, vii) can support existing results or provide information on mutagenicity mechanisms. However, structural alerts in Salmonella mutagenicity tests (vi) do not inform on gene mutations in mammalian cells and no information is provided on type of structural alerts in DEREK (vii).

67 Therefore, the requirements of Annex VIII, Section 8.4., Column 2 are not met and your adaptation is rejected.

3.4. Specification of the study design

68 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.

69 In the comments to the draft decision you agree with the request.

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).
Guidance for monomers and polymers; ECHA (2012).
Guidance on intermediates; ECHA (2010).
All guidance documents are 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 30 June 2022.

Your dossier contains a testing proposal for the information requirement Developmental toxicity study (Annex X, Section 8.7.2). Therefore, this information requirement is descoped from this CCH and the testing proposal will be addressed in a separate draft decision.

The deadline of the decision is set based on standard practice for carrying out OECD TG tests. It has been exceptionally extended by 6 months from the standard deadline granted by ECHA to take into account currently longer lead times in contract research organisations.

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

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

In your comments on the draft decision, you requested an extension of the deadline to provide information from 18 to 24 months from the date of adoption of the decision.
In order to support your request you refer to the *"considerable waiting time for in vitro genotoxicity tests"* and to the time required to accommodate sequential testing.

As indicated above, the timelines set in the draft decision already account for the longer lead in times in testing facilities, and you have not substantiated that this would not be sufficient, and accommodate sequential testing. On this basis, ECHA has not modified the deadline to provide the information.

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: Addressee(s) 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;
- the information specified in Annexes VII, VIII and IX to REACH, for registration at 100-1000 tpa;
- the information specified in Annexes VII to X to REACH, for registration at more than 1000 tpa.

Registrant Name	Registration number	Highest REACH Annex applicable to you
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
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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[2].

(4) Under the introductory part of Annexes VII/VIII/IX/X to REACH, where a test method offers flexibility in the study design, for example in relation to the choice of dose levels or concentrations, the chosen study design must ensure that the data generated are adequate for hazard identification and risk assessment.

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.

[2] https://echa.europa.eu/practical-guides

With that detailed information, ECHA can confirm 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 (https://echa.europa.eu/manuals).