EUROPEAN CHEMICALS AGENCY

Helsinki, 30 June 2020

Addressees
Registrant of JS_41098-56-0 listed in the last Appendix of this decision

Date of submission for the dossier subject of this decision
2 January 2015

Registered substance subject to this decision, hereafter 'the Substance'
Substance name: Hexasodium 2,2'-[vinylenebis[(3-sulphonato-4,1-phenylene)imino[6-(diethylamino)-1,3,5-triazine-4,2-diyl]imino]]bis(benzene-1,4-disulphonate)
EC number: 255-217-5
CAS number: 41098-56-0

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

DECISION ON A COMPLIANCE CHECK

Based on Article 41 of Regulation (EC) No 1907/2006 (REACH), ECHA requests that you submit the information listed below by the deadline of ***5 October 2021***.

A. Requirements applicable to 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 EU B.13/14. / OECD TG 471) with the Substance;

2. Growth inhibition study aquatic plants (Annex VII, Section 9.1.2.; test method EU C.3./OECD TG 201) with the Substance;

B. Requirements applicable to all the Registrants subject to Annex VIII of REACH

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

2. Only if a negative result in Annex VII, Section 8.4.1. and Annex VIII, Section 8.4.2. is obtained, In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method OECD TG 476 or TG 490) with the Substance;

Conditions to comply with the requests

You are bound by the requests for information corresponding to the REACH Annexes applicable to your own registered tonnage of the Substance at the time of evaluation.
Therefore you have to comply with the requirements of Annexes VII, VIII and IX of REACH, if you have registered a substance at 100-1000 tpa.

The Appendix on general considerations addresses common arguments that are applicable throughout the present decision while the other Appendices state the reasons for the requests for information to fulfil the requirements set out in the respective Annexes of REACH.

The Appendix entitled Observations and technical guidance addresses the generic approach for the selection and reporting of the test material used to perform the required studies and provides generic recommendations and references to ECHA guidance and other reference documents.

You must submit the information requested in this decision by the deadline indicated above in an updated registration dossier and also update the chemical safety report, where relevant, including any changes to classification and labelling, based on the newly generated information. The timeline has been set to allow for sequential testing where relevant.

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 on general considerations

(i) Assessment of the weight-of-evidence approach, under the requirements of Annex XI, Section 1.2.

You have adapted the following standard information requirements by applying weight of evidence (WoE) approaches in accordance with Annex XI, Section 1.2:

- In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.)
- In vitro cytogenicity study in mammalian cells or in vitro micronucleus study (Annex VIII, Section 8.4.2.)

In addition, in your comments to the draft decision you propose to adapt the following standard information requirement by applying weight of evidence (WoE) approach in accordance with Annex XI, Section 1.2:

- Growth inhibition study aquatic plants (Annex VII, Section 9.1.2.)

Annex XI, Section 1.2 states that there may be sufficient weight of evidence (WoE) from several independent sources of information leading to assumption/conclusion that a substance has or has not a particular dangerous (hazardous) property, while information from a single source alone is insufficient to support this notion.

According to ECHA Guidance R.4.4, a WoE adaptation involves an assessment of the relative values/weights of different pieces of the available information which is defined by e.g. the reliability of the data, consistency of results/data, nature and severity of effects, and relevance of the information for the given regulatory endpoint. Subsequently, the lines of evidence should be integrated considering their relative values or weights in order to draw a conclusion. Adequate and reliable documentation shall be provided to describe your WoE approach, the assessment of relative weights of individual piece of information and the subsequent conclusions drawn.

You have based your WoE approaches on information on similar substances obtained from the QSAR Toolbox and/or from the substance hexasodium 2,2'-[vinylenebis[(3-sulphonato-4,1-phenylene)imino(6-phenoxy-1,3,5-triazine-4,2-diyl)imino]]bis(benzene-1,4-disulphonate) (EC 255-284-0, CAS 41267-43-0).

We have assessed this information according to the requirements of Annex XI, Section 1.2 of the REACH Regulation and identified the following general issues.

1. Relevance of information – requirement for a scientific justification for the use of information from similar substances

Based on the ECHA Guidance R.4, Section R.4.3.2.2., a scientific justification needs to establish why the toxicological or ecotoxicological properties of the Substance can be determined from information on the similar substances. It should also explain why the differences between these substances should not influence the toxicological/ ecotoxicological properties of the Substance or should do so in a regular predictable pattern.
According to the information provided in your dossier, your WoE adaptations are based on information on similar substances obtained through the use of data from the QSAR Toolbox and/or directly from information on the analogue substance CAS 41267-43-0. In addition in your comments to the draft decision you refer to information on the analogue substances CAS 16470-24-9, CAS 4193-55-9, CAS 16090-02-1, CAS 70942-01-7, CAS 12224-02-1, CAS 2519-30-4.

- Information from the QSAR Toolbox: You have provided QSAR Toolbox prediction reports detailing the structural and mechanistic criteria used for identifying the similar substances and providing high level information on the identity of these substances. These descriptions of structural and mechanistic criteria document the selection of the source substances but do not constitute on their own scientific justifications on why this information is adequate and relevant in the context of these WoE approaches.

- Information from the similar substance CAS 41267-43-0 in your dossier: You have not provided any scientific information establishing why the toxicological properties of the Substance can be determined from information on the similar substance. Consequently, this information cannot be considered as relevant for the purpose of identification of the hazard of the Substance by means of weight of evidence.

- Information on the similar substances CAS 16470-24-9, CAS 4193-55-9, CAS 16090-02-1, CAS 70942-01-7, CAS 12224-02-1, CAS 2519-30-4 and CAS 41267-43-0 provided in your comments: You have attached a document to your comments to the draft decision intended to justify the use of information obtained on the similar substances CAS 16470-24-9, CAS 4193-55-9, CAS 16090-02-1, CAS 70942-01-7, CAS 12224-02-1, CAS 2519-30-4 and CAs 41267-43-0 in your WoE adaptation. This document presents a set of physico-chemical properties and alerts obtained from the QSAR Toolbox v3.4 for the Substance and for each of these similar substances. On the basis of this information you derive conclusions on the structural similarities, similarities in physico-chemical properties and similarities in the alert profiles between the Substance and each of the above similar substance. You conclude that "*Based on structural similarity, reactivity, physical–chemical properties, and general mechanistic approach, the above were identified as read-across materials with sufficient data for toxicological evaluation*".

  Provided that the applicability domain is appropriate, the results from using QSAR models may be used in a weight of evidence analysis where such data are considered alongside other relevant data[2,3]. No information on the applicability domain of the expert systems used to generate the alert profiles of the substances has been provided. Therefore the reliability of these predictions cannot be assessed. Considering the complexity and amount of information needed from various function and parameters to evaluate endpoints such as growth inhibition on aquatic plants and genotoxicity, QSAR predictions alone do not establish that structurally similar substances have similar properties for these endpoints. You have not provided robust scientific information on why the differences between these substances should not influence the toxicological/ ecotoxicological properties of the Substance and which would include relevant and reliable studies of comparable design and duration establishing why the (eco)toxicological properties of the Substance can be determined from information on the similar substances.

2. Reliability of the information on similar substances

- Information obtained from the QSAR Toolbox in your dossier

The ECHA Guidance R.4, Section R.4.2 informs on the criteria for assessing the reliability of information provided as part of WoE adaptations. The availability of raw data from the studies and an adequate description of the studies are listed among the key elements to be assessed to determine if and how the information can be used in the adaptation. This ECHA Guidance

[2] ECHA Guidance R.7a, Section R.7.6.4.1.2
[3] ECHA Guidance R.7a, Section R.7.5.4.1.1

indicates that "*where critical supporting information is not reported (e.g. species tested, substance identity and dose procedure) the test data should be considered to be unreliable for the purposes of REACH*".

Your WoE adaptations are partly based on information on similar substances obtained through the use of data from the QSAR Toolbox. The QSAR Toolbox prediction reports provided to support the use of this data do not include any information on the test procedures applied, and on the results of the studies on the similar substances. In the absence of this information, the information from the QSAR toolbox referred to in your WoE adaptations is considered unreliable.

- Information on analogue substances referred to in your comments

Under Article 10(a)(vii) of the REACH Regulation, a technical dossier must include "*robust study summaries of the information derived from the application of Annexes VII to XI, if required under Annex I*". Annex I, Section 1.1.4/3.1.5 of REACH states that robust study summaries are "*required of all key data used in the hazard assessment*".
In the document attached to your comments to the draft decision you have identified studies conducted with analogue substances that you intend to use as sources of information in your weight of evidence approach and provided high-level narratives presenting these studies.
You have not provided robust study summaries for any for these source studies. In particular you have not provided detailed information on the methods, results and conclusions of these studies allowing for an independent assessment of the studies. In the absence of such information, we cannot assess the reliability of the information from these studies.

3. Requirement for documentation of the WoE adaptations

ECHA Guidance R.4.4 specifies that a WoE adaptation must involve an assessment of the relative values / weights of the several pieces of available information. This assessment must consider for instance the relevance and reliability of the information, the consistency of results/data, the nature and severity of effects. The lines of evidence should be integrated considering their relative values or weights in order to draw a conclusion. The assessment should be documented and included in your technical dossier.

You have provided WoE summaries in the endpoint summaries for genetic toxicity. In this summary you briefly present each of the sources of information in a tabular format, specify the dose descriptors obtained from these studies and outline the effects observed/the absence of effects observed in these sets of data.

In each of the endpoint-specific sections of your comments to the draft decision you described the sources of information that you considered in your WoE adaptation and concluded that with this information you consider that you have been able to fulfil the different information requirements.

Whilst these reports can be regarded as integrated summaries of the data sets, you have not communicated and documented in a robust and transparent manner your considerations on the relevance, relialibity of the individual sources of information. No critical assessment of their relative weight and of the overall adequacy of the data set in the context of these WoE is included in the documentation of your adaptations. Therefore your weight-of-evidence adaptation is not supported by adequate documentation.

4. Conclusion of the WoE assessment

As your WoE adaptations are neither based on relevant and/or reliable data to allow reaching

a conclusion on the relevant hazard properties of the Substance nor supported by adequate documentation for the reasons presented above, they do not comply with the general rules of adaptation as set out in Annex XI, Section 1.2. Therefore, your adaptations are rejected.

Appendix A: Reasons for the requests to comply with Annex VII of REACH

In accordance with Articles 10(a) and 12(1) of the REACH Regulation, a technical dossier registered at 1 to 10 tonnes or more per year must contain, as a minimum, the information specified in Annex VII to the REACH Regulation.

1. In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.)

An *In vitro* gene mutation study in bacteria is a standard information requirement in Annex VII to REACH.

You have adapted the standard information requirement according to Annex XI, Section 1.2. Weight of evidence of REACH.

You have provided the following information for this WoE adaptation:

i. Information obtained from the QSAR toolbox ([redacted] 2014) predicting negative results for the Substance in a bacterial reverse mutation assay in Salmonella typhimurium TA 100;
ii. Information from a bacterial reverse mutation assay (National institute of technology and evaluation, 2004) conducted with the substance hexasodium 2,2'-{ethene-1,2-diylbis[(3-sulfonato-4,1-phenylene)imino(6-phenoxy-1,3,5-triazine-4,2-diyl)imino]}dibenzene-1,4-disulfonate (EC 255-284-0 – CAS 41267-43-0).

Furthermore, in your comments to the draft decision you have referred to:

i. A publication by Seifried et al (Chemical Research in Toxicology, 2006), proposed analogue 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS: 16090-02-1), "equivalent to OECD 471", and
ii. An OECD SIDS report (2006), proposed analogue substance potassium sodium 4,4'-bis[6-anilino-4-[bis(2-hydroxyethyl)amino]-1,3,5-triazin-2-yl]amino]stilbene-2,2'-disulphonate (EC 275-031-8; CAS 70942-01-7), "equivalent to OECD 471", and
iii. "*in vivo* studies" on a proposed analogue substance 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS 16090-02-1), no guideline.

For the reasons explained in the Appendix on General considerations the information obtained from QSAR Toolbox and information on the similar substances is not considered reliable and relevant for the purpose of identification of the hazard of the Substance. Your WoE adaptation is also not supported by adequate documentation.

Therefore, the information requirement is not fulfilled.

Possibility for data sharing:

ECHA notes that the jointly submitted registration for the Substance contain data which is relevant for this endpoint. In accordance with Title III of the REACH Regulation, you may request it from the other registrant(s) and then make every effort to reach an agreement on the sharing of data and costs.

2. Growth inhibition study aquatic plants (Annex VII, Section 9.1.2.)

Growth inhibition study aquatic plants is a standard information requirement in Annex VII to REACH.

You have provided a key study "Determination of the effect of Hexasodium 2,2'-[vinylenebis[(3-sulphonato-4,1-phenylene)imino[6-(diethylamino)-1,3,5-triazine-4,2-diyl]imino)]bis(benzene-1,4-disulphonate) (CAS No. 41098-56-0) on the growth of freshwater green alga *Chlorella vulgaris*" (2014).

According to Article 13(4) of REACH, ecotoxicological tests and analyses shall be carried out in compliance with the principles of good laboratory practice (GLP). According to Article 141(2), Article 13 applies from entry into application of the REACH Regulation on 1 June 2008.

The study you provided was conducted according to OECD TG 201 but it was not performed in compliance with GLP.

In your comments to the draft decision, you provided a short summary of the study already addressed in the draft decision, and you indicated that in accordance with Annex XI, Section 1.1. all the criteria's are fulfilled. We understand that you intend to use data according to Annex XI, Section 1.1.2. You also provided information obtained from QSAR Toolbox and information on the similar substances, as explained under General considerations.

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

The provisions in Annex XI, Section 1.1 concern only data generated before REACH entered into application (June 2008).

As the study is from the year 2014, Annex XI, section 1.1.2 does not apply. Therefore, your adaptation under Annex XI, Section 1.1.2. is rejected.

Furthermore, in your comments to the draft decision you have referred to:

i. An OECD TG 201 study on a proposed analogue substance (tetrasodium2,2'-ethene-1,2-diylbis[5-({4-[bis(2-hydroxyethyl)amino]-6-[(4- sulfonatophenyl) amino]-1,3,5-triazin-2-yl}amino)benzenesulfonate] (CAS 16470-24-9 EC no. 240-521-2) obtained through the use of data from the QSAR Toolbox; and
ii. An OECD TG 201 study on a proposed analogue substance disodium 4,4'-bis[6-anilino-[4-[bis(2-hydroxyethyl)amino]-1,3,5-triazin-2-yl]amino]stilbene-2,2'-disulphonate (CAS 4193-55-9, EC no. 224-073-5) obtained through the use of data from the QSAR Toolbox.

We understand that you intend to use this information alongside the information from the study on the Substance included in your dossier as part of a weight of evidence adaptation according to Annex XI, Section 1.2. We have assessed this information, but for the reasons explained in the Appendix on General considerations the information obtained from QSAR Toolbox and information on the similar substances is not considered reliable and relevant for the purpose of identification of the hazard of the Substance. Your WoE adaptation is also not supported by adequate documentation.

Therefore, the information requirement is not fulfilled.

Appendix B: Reasons for the requests to comply with Annex VIII of REACH

In accordance with Articles 10(a) and 12(1) of the REACH Regulation, a technical dossier registered at 10 to 100 tonnes or more per year must contain, as a minimum, the information specified in Annexes VII and VIII to the REACH Regulation.

1. In vitro cytogenicity study in mammalian cells or in vitro micronucleus study (Annex VIII, Section 8.4.2.)

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

You have adapted the standard information requirement according to Annex XI, Section 1.2. of REACH. In support of your adaptation of this information requirement, you have provided the following information for this endpoint:

i. *in vitro* chromosomal aberration test (National institute of technology and evaluation, 2004) conducted with the substance hexasodium 2,2'-{ethene-1,2-diylbis[(3-sulfonato-4,1-phenylene)imino(6-phenoxy-1,3,5-triazine-4,2-diyl)imino]}dibenzene-1,4-disulfonate (EC 255-284-0 – CAS 41267-43-0).

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

A. Annex XI, Section 1.2 specifies that a WoE must rely on several independent sources of information to support the assumption/conclusion that a substance has or has not a particular dangerous (hazardous) property.

You provided a single *in vitro* gene mutation study in mammalian cells. Therefore your weight of evidence adaptation does not include several independent sources of information and does not comply with the general rules of adaptation as set out in Annex XI, Section 1.2.

In your comments to the draft decision you have provided information that may be considered further sources of information giving weight of evidence in the meaning of Annex XI, Section 1.2. You refer to:

ii. A publication by Abe and Sasaki (J Natl Cancer Inst, 1977) on the similar substance tetrasodium 4,4'-bis[[4-[bis(2-hydroxyethyl)amino]-6-[(3-sulphonatophenyl)amino]-1,3,5-triazin-2-yl]amino] stilbene-2,2'-disulphonate (EC 235-422-6; CAS 12224-02-1), and

iii. Data from United States Environmental Protection Agency HPVIS database (2019) on the similar substance 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS 16090-02-1), OECD TG 473, and

iv. "*in vivo* studies", on the similar substance 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS 16090-02-1), no guideline.

We understand that you intend to use this information alongside the information from study i. included in your dossier as part of a weight of evidence adaptation according to Annex XI, Section 1.2. However, for the reasons explained in the Appendix on General considerations the information obtained from QSAR Toolbox and information on the similar substances is not considered reliable and relevant for the purpose of identification of the hazard of the Substance. Your WoE adaptation is also not supported by adequate documentation.

B. The single study provided in your registration dossier has been further assessed in accordance with the requirements of Annex XI, Section 1.5 on use of grouping approaches and read-across.

Annex XI, Section 1.5. specifies three conditions which must be fulfilled whenever a read-across approach is used:

(i) 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;
(ii) 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;
(iii) adequate and reliable documentation of the applied method must be provided.

Additional information on what is necessary when justifying a read-across approach can be found in the ECHA Guidance R.6 and related documents.

You have not provided any documentation, in your IUCLID dossier nor in the CSR, to explain your read-across hypothesis and to support that the information on the similar substance hexasodium 2,2'-{ethene-1,2-diylbis[(3-sulfonato-4,1-phenylene)imino(6-phenoxy-1,3,5-triazine-4,2-diyl)imino]}dibenzene-1,4-disulfonate (EC 255-284-0 – CAS 41267-43-0) may provide a reliable basis to predict the properties under consideration of the Substance.

As your read-across adaptation is not supported by adequate documentation, it does not comply with the general rules of adaptation as set out in Annex XI, Section 1.5. Therefore, your adaptation is rejected.

On the selected read-across study ECHA notes the following issue:

For any study used to conclude on a given intrinsic property of the Substance, a robust study summary must be provided (Articles 3(28) and 10(a)(vii) and Annex I, Section 1.1.4 of REACH). A robust study summary must cover critical information and allows for an assessment of the validity and reliability of the study. For an *in vivo* mammalian gene mutation study, it must provide a toxicological evaluation of the findings of the study. If relevant include a summary of confounding factors that may affect the results of the study and analysis of equivocal results.

According to the information provided in your robust study summary, a statistically significant increase in the number of cells with aberrations has been observed in the short-term treatment experiment in the absence of metabolic activation. The robust study summary submitted in your technical dossier does not include a discussion of this finding. Therefore the documentation of this study is insufficient and does not allow an independent assessment of the adequacy of this study, its results and its use for hazard assessment.

Therefore the information requirement is not fulfilled.

Possibility for data sharing:
ECHA notes that the other registrants of the joint submission relied on an adaptation to meet this information requirement. You may consider data sharing for this information.

2. In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.)

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

Your dossier contains an adaptation 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.

The information for the *in vitro* gene mutation study in bacteria and for the *in vitro* cytogenicity study in mammalian cells or *in vitro* micronucleus study provided in the dossier are rejected for the reasons provided in sections 1 of Appendix A and section 1 of Appendix B.

The result of the requests for information in sections 1 of Appendix A and 2 of Appendix B 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.

In your comments to the draft decision, in your comments to the draft decision you have referred to:

i. A publication by Seifried et al (Chemical Research in Toxicology, 2006) on a proposed analogue substance 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS 16090-02-1), no guideline, and
ii. A study on a proposed analogue substance tetrasodium 4-acetamido-5-hydroxy-6-({7-sulfonato-4-[(4-sulfonatophenyl)diazenyl]-1-naphthyl}diazenyl)naphthalene-1,7-disulfonate (EC 219-746-5; CAS: 2519-30-4), no bibliographical reference, no guideline, and
iii. "in vivo study", proposed analogue substance 4,4'-bis[(4-anilino-6-morpholino-1,3,5-triazin-2-yl)amino]stilbene-2,2'-disulphonate (EC 240-245-2; CAS 16090-02-1), no guideline.

We understand that you intend to use this information as part of a weight of evidence adaptation according to Annex XI, Section 1.2 to fulfil this information requirement. We have assessed this information but for the reasons explained in the Appendix on General considerations cannot accept the adaptation based on the information provided. The information obtained from QSAR Toolbox and information on the similar substances is not considered reliable and relevant for the purpose of identification of the hazard of the Substance. Your WoE adaptation is also not supported by adequate documentation. For all these reasons, your adaptation is rejected.

Consequently, 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.

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

Possibility for data sharing:

ECHA notes that the other registrants of the joint submission relied on an adaptation to meet this information requirement. You may consider data sharing for this information.

Appendix C: Procedural history

For the purpose of the decision-making, this decision does not take into account any updates of registration dossiers after the date on which you were notified the draft decision according to Article 50(1) of the REACH Regulation.

The compliance check was initiated on 15 March 2019.

The decision making followed the procedure of Articles 50 and 51 of the REACH Regulation, as described below:

ECHA notified you of the draft decision and invited you to provide comments within 30 days of the notification.

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

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

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

Appendix D: Observations and technical guidance

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

2. Failure to comply with the requests in this decision, or to otherwise fulfil the information requirements with a valid and documented adaptation, will result in a notification to the enforcement authorities of the Member States.

4. Test guidelines, GLP requirements and reporting
Under Article 13(3) of REACH, all new data generated as a result of this decision needs to be conducted according to the test methods laid down in a European Commission Regulation or according to international test methods recognised by the Commission or ECHA as being appropriate.

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

   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: 'How to report robust study summaries[4]'.

5. Test material

   Selection of the test material(s)
The registrants of the Substance are responsible for agreeing on the composition of the test material to be selected for carrying out the tests required by the present decision. The test material selected must be relevant for all the registrants of the Substance, i.e. it takes into account the variation in compositions reported by all members of the joint submission. The composition of the test material(s) must fall within the boundary composition(s) of the Substance.

   While selecting the test material you must take into account 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.

   Technical reporting of the test material
The composition of the selected test material must be reported in the respective endpoint study record, under the Test material section. The composition must include all constituents of the test material and their concentration values. Without such detailed reporting, ECHA may not be able to confirm that the test material is relevant for the Substance and to all the registrants of the Substance.

   Technical instructions are available in the manual "How to prepare registration and PPORD dossiers"[5].

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

6. List of references of the ECHA Guidance documents[6]

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

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

ECHA Read-across assessment framework (RAAF, March 2017)[7]

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

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

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

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

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

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

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

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

[6] https://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment
[7] https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across

Appendix E: List of the registrants to which the decision is addressed and the corresponding information requirements applicable to them

Registrant Name	Registration number	(Highest) Data requirements to be fufilled
[redacted]	[redacted]	[redacted]