Section A7 Annex Point A7.3	Fate and behaviour in air	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [x]** **Other justification [ ]**	
Detailed justification:	According to the 'Technical Guidance Document on data requirements', subjects under 7.3 are additional data requirements. As lactic acid will be used in products that are to be used in-house only, information on the fate and behaviour in air is not required. The atmospheric oxidation by hydroxyl radicals and ozone was calculated using the Atmospheric Oxidation Program for Microsoft Windows (AOPWIN v. 4.01, in EPISUITE v 3.11). The estimation methods used by AOPWIN are based on the structure-activity relationship (SAR) methods developed by Atkinson. The calculated overall OH rate constant is 5.92 x 10^{-12} cm^3 mol^{-1} sec^{-1}. Assuming a 12-h day and an OH concentration of 1.5 x 106 cm-1 this gives a half-life of 1.8 days.	
Undertaking of intended data submission [ ]	Not applicable	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	2009/04/23	
Evaluation of applicant's justification	Applicant's justification is accepted.	
Conclusion	Applicant's justification can be adopted with minor restrictions regarding the applied input parameters for AOPWIN.	
Remarks	According to the TGD (Part II, Chapter 2.3.6.3) a 24 hours day in QSAR calculation of half life should be assumed. Considering the 24-h day and the corresponding OH–radical concentration of 5 x 10^5 molecules x cm^{-3}, the half life is 2.71 days.	
	COMMENTS FROM OTHER MEMBER STATE *(specify)*	
Date	*Give date of comments submitted*	
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*	
Conclusion	*Discuss if deviating from view of rapporteur member state*	
Remarks		