

Committee for Risk Assessment RAC

Annex 1 **Background document**

to the Opinion proposing harmonised classification and labelling at Community level of

imidazole

EC number: 206-019-2 CAS number: 288-32-4

CLH-O-0000002699-59-03/A1

The background document is a compilation of information considered relevant by the dossier submitter or by RAC for the proposed classification. It includes the proposal of the dossier submitter and the conclusion of RAC. It is based on the official CLH report submitted to public consultation. RAC has not changed the text of this CLH report but inserted text which is specifically marked as 'RAC evaluation'. Only the RAC text reflects the view of RAC.

Adopted

10 September 2013

CLH report

Proposal for Harmonised Classification and Labelling

Based on Regulation (EC) No 1272/2008 (CLP Regulation), Annex VI, Part 2

Substance Name: Imidazole

EC Number: 206-019-2

CAS Number: 288-32-4

Index Number: --

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Part A.

1 PROPOSAL FOR HARMONISED CLASSIFICATION AND LABELLING

1.1 Substance

Table 1: Substance identity

Substance name:	Imidazole
EC number:	206-019-2
CAS number:	288-32-4
Annex VI Index number:	NA NA
Degree of purity:	>= 99.5 <= 99.9 % (w/w)
Impurities:	Impurities are not considered relevant for the classification and labelling of the substance.

1.2 Harmonised classification and labelling proposal

Table 2: The current Annex VI entry and the proposed harmonised classification

	CLP Regulation	Directive 67/548/EEC (Dangerous Substances Directive; DSD)
Current entry in Annex VI, CLP Regulation	No classification	No classification
Current proposal for consideration by RAC	Classification Acute Tox. 4, H302 Skin Corr. 1C, H314 Severe eye irritation Cat.1, H318 Developm.: Repr. Cat. 1B, H360D Labelling GHS05, GHS07, GHS08 H302, H314, H360D, Dgr	Classification Repr. Cat 2; R61 Xn; R22 C; R34 Labelling T R: 61-22-34

Resulting harmonised classification	Classification	Classification
(future entry in Annex VI, CLP	Acute Tox. 4, H302	Repr.Cat 2; R61
Regulation)	Skin Corr. 1C, H314	Xn; R22
	Severe eye irritation Cat.1, H318	C; R34
	Developm.: Repr. Cat. 1B, H360D	<u>Labelling</u>
	<u>Labelling</u>	Т
	GHS05, GHS07, GHS08	R: 61-22-34
	H302, H314, H360D, Dgr	

1.3 Proposed harmonised classification and labelling based on CLP Regulation and/or DSD criteria

 Table 3:
 Proposed classification according to the CLP Regulation

CLP Annex	Hazard class	classification SCLs classification		Reason for no classification ²⁾	
I ref			and/or M- factors	1)	
2.1.	Explosives				Reason for no classification: conclusive but not sufficient for classification
2.2.	Flammable gases				Reason for no classification: conclusive but not sufficient for classification
2.3.	Flammable aerosols				Reason for no classification: conclusive but not sufficient for classification
2.4.	Oxidising gases				Reason for no classification: conclusive but not sufficient for classification
2.5.	Gases under pressure				Reason for no classification: conclusive but not sufficient for classification
2.6.	Flammable liquids				Reason for no classification: conclusive but not sufficient for classification
2.7.	Flammable solids				Reason for no classification: conclusive but not sufficient for classification
2.8.	Self-reactive substances and mixtures				Reason for no classification: conclusive but not sufficient for classification
2.9.	Pyrophoric liquids				Reason for no classification: conclusive but not sufficient for classification
2.10.	Pyrophoric solids				Reason for no classification: conclusive but not sufficient for classification
2.11.	Self-heating substances and mixtures				Reason for no classification: conclusive but not sufficient for classification
2.12.	Substances and mixtures which in contact with water emit flammable gases				Reason for no classification: conclusive but not sufficient for classification
2.13.	Oxidising liquids				Reason for no classification: conclusive but not sufficient for classification
2.14.	Oxidising solids				Reason for no classification: conclusive but not sufficient for classification

2.15.	Organic peroxides			Reason for no classification: conclusive but not sufficient for classification
2.16.	Substance and mixtures corrosive to metals			Reason for no classification: conclusive but not sufficient for classification
3.1.	Acute toxicity - oral	GHS07, Acute Tox. 4, H302		
	Acute toxicity - dermal			Reason for no classification: conclusive but not sufficient for classification
	Acute toxicity - inhalation			Reason for no classification: conclusive but not sufficient for classification
3.2.	Skin corrosion / irritation	GHS05, Skin Corr. 1C, H314		
3.3.	Serious eye damage / eye irritation	GHS05, Eye Damage 1, H318		
3.4.	Respiratory sensitisation			Data lacking
3.4.	Skin sensitisation			Reason for no classification: conclusive but not sufficient for classification
3.5.	Germ cell mutagenicity			Reason for no classification: conclusive but not sufficient for classification
3.6.	Carcinogenicity			Reason for no classification: conclusive but not sufficient for classification
3.7.	Reproductive toxicity	GHS08, Repr. 1B, H360D		
3.8.	Specific target organ toxicity – single exposure			Reason for no classification: conclusive but not sufficient for classification
3.9.	Specific target organ toxicity – repeated exposure			Reason for no classification: conclusive but not sufficient for classification
3.10.	Aspiration hazard			Reason for no classification: conclusive but not sufficient for classification
4.1.	Hazardous to the aquatic environment			Reason for no classification: conclusive but not sufficient for classification
5.1.	Hazardous to the ozone layer			Reason for no classification: conclusive but not sufficient for classification

¹⁾ Including specific concentration limits (SCLs) and M-factors
2) Data lacking, inconclusive, or conclusive but not sufficient for classification

Labelling: Signal word:

Danger

Pictogramms:

GSH05, GSH07, GSH08

Hazard statements:

H314: Causes severe skin burns and eye damage

H302: Harmful if swallowed

H360D: May damage the unborn child after oral exposure.

Precautionary statements:

No subject for Annex entry.

Proposed notes assigned to an entry: none

Table 4: Proposed classification according to DSD

Hazardous property	Proposed classification	Proposed SCLs	Current classification 1)	Reason for no classification ²⁾
Explosiveness				Reason for no classification: conclusive but not sufficient for classification
Oxidising properties				Reason for no classification: conclusive but not sufficient for classification
Flammability				Reason for no classification: conclusive but not sufficient for classification
Other physico- chemical properties [Add rows when relevant]				Reason for no classification: conclusive but not sufficient for classification
Thermal stability				Reason for no classification: conclusive but not sufficient for classification
Acute toxicity	Xn; R22			
Acute toxicity – irreversible damage after single exposure				Reason for no classification: conclusive but not sufficient for classification
Repeated dose toxicity				Reason for no classification: conclusive but not sufficient for classification

Irritation / Corrosion	C; R34		
Sensitisation			According to REACH (1907/2006/EC) Annex VII, 8.3, column 2 an in vivo skin sensitisation test is not required if the substance is classified for skin corrosivity.
Carcinogenicity			Data lacking
Mutagenicity – Genetic toxicity			Reason for no classification: conclusive but not sufficient for classification
Toxicity to reproduction – fertility			Reason for no classification: conclusive but not sufficient for classification
Toxicity to reproduction – development	Repr. Cat. 2; R61		
Toxicity to reproduction – breastfed babies. Effects on or via lactation			Reason for no classification: conclusive but not sufficient for classification
Environment			Reason for no classification: conclusive but not sufficient for classification

Labelling: Indication of danger:

T-toxic

R-phrases:

R34 – causes burns

R22 – harmful if swallowed

R61 – may cause harm to the unborn child

S-phrases:

S22 – do not breathe dust

S36/37/39 – wear suitable protective clothing, gloves and eye/face protection

S26 – in case of contact with eyes, rinse immediately with plenty of water and seek medical advice

S45 - in case of accident or if you feel unwell, seek medical advice immediately (show the label where possible)

S53 – avoid exposure – obtain special instructions before use

 $^{^{1)}}$ Including SCLs $^{2)}$ Data lacking, inconclusive, or conclusive but not sufficient for classification

2 BACKGROUND TO THE CLH PROPOSAL

2.1 History of the previous classification and labelling

Imidazole is not legally classified according to Regulation 1272/2008/EC (CLP) and Directive 67/548/EEC (DSD) and not listed in the Annex I of 67/548/EC Directive. Notably, the classification of imidazole as CMR substance (Repr. Cat 2; R61) was already agreed by the European Chemicals Bureau in 2007. However, as there were open issues concerning classification of other endpoints, the classification was not finalised by EU.

2.2 Short summary of the scientific justification for the CLH proposal

Acute toxicity

Current classification: no classification in Annex VI of CLP

Proposed classification: Acute Tox. 4, (CLP) and Xn; R22; (DSD)

Acute toxicity: oral

In an acute oral toxicity study, the LD50 in rats was determined to be 970 mg/kg bw (BASF SE, 1956a). Groups of up to 5 animals (sex not specified) were treated with doses of 500, 700, 1000, 1260, 2000, 4000 and 5000 mg/kg bw and were observed for 7 days after dosing. From 1260 mg/kg bw onwards, the substance was lethal to all treated animals. At 1000 mg/kg bw and 700 mg kg bw mortality was 2/5 and 1/5, respectively. Deaths occurred within one day. The symptoms were described as convulsions and disequilibria with lateral posture. Apathy and accelerated respiration was noted in survivors. There was no difference in toxicity between this test with high purity imidazole when compared to the test with 95% imidazole (LD50 rat 960 mg/kg bw) which was performed under the same test conditions (BASF SE, 1956b). Based on these results imidazole is considered to be harmful if swallowed in an acute toxicity study.

Irritation/corrosion

Current classification: no classification in Annex VI of CLP

Proposed classification: Skin Corr. 1C, H314; Eye Damage 1, H318; (CLP) and C; R34 (DSD)

Skin irritation/corrosion

In a patch test, the clipped dorsal skin of six rabbits was exposed to a 2 x 2 cm patch loaded with 0.5 ml of an aqueous paste of imidazole (concentration 80%) for 1 or 4 hours. Upon removal of the patch, the treated skin area was washed with polyethylene glycol 400 and subsequently with a 1:1 mixture of polyethylene glycol 400 and water. Immediately after 4-hour exposure, the 2 exposed rabbits exhibited severe reddening of the area of exposure and beyond, accompanied by severe oedema. Soft necrosis and marked oedema were observed 24 hours after application. Mild oedema and necrosis with a parchment-like or leathery appearance were still visible at the end of the 8-day post-exposure observation period. No signs of absorptive intoxication were observed after 4 hours of exposure. Imidazole was considered corrosive based on the results obtained after 4-hours of exposure.

After the 1 hour exposure under occlusive dressing, mild erythema was seen in all (4/4) animals. Mild erythema and mild oedema were observed on the following two days of the study. The

oedema resolved completely by day 8 of the post-exposure observation period. Residual signs included patchy, superficial necrotic lesions in addition to scaling. On the basis of the results obtained after 1 hour exposure no substance specific destruction of skin tissue, namely, visible necrosis through the epidermis and into the dermis, was observed (BASF SE, 1979a).

Eye irritation/corrosion

Application of 0.1 g unchanged imidazole to the rabbit's eye (BASF SE, 1979b) affected iris, conjunctiva, cornea, and the nictating membrane of the animals. Grade 2 reddening and swelling of the conjunctiva was noted along with chemosis, which aggravated and persisted to grade 3 until day 8. Corneal opacity grade 2 persisted until the end of the observation period on day 8. The affected corneal area comprised more than three quarters. The observed manifestations of irreversible tissue damage and persistent large size cornea opacity indicate that imidazole is severely irritating to corrosive to the rabbit eye.

Toxicity to reproduction

Current classification: no classification in Annex VI of CLP

Proposed classification: Repr. 1B, H360D (CLP) and Repr. Cat. 2; R61 (DSD)

Developmental toxicity/teratogenicity

In a prenatal developmental study conducted in accordance with OECD TG 414, imidazole (purity 99.8%) was administered by oral gavage to Wistar rats from day 6 to 19 of gestation. The dose levels were 0 (vehicle control water), 20, 60 or 180 mg/kg bw/d. During the study, the dams were assessed for clinical observations, body weight and food consumption, and corrected body weight was determined upon necroscopy. Dams were examined for gross pathological changes, the number of corpora lutea in the ovaries, conception rate, the number of live fetuses and pre- and post-implantation losses. The fetuses were weighed, sexed and macroscopically examined for external alterations. One half of all fetuses were fixed and examined for effects on the inner organs, while the other half of fetuses were fixed and stained for skeletal and cartilage evaluation.

No signs of maternal toxicity, fetal or developmental toxicity were noted at 20 and 60 mg/kg bw per day. At 180 mg/kg bw/d significantly a reduced food intake by -13 % was noted when the treatment was started. This was reflected by a statistical significantly reduced body weight gain on gestational days 6 to 8 (-45 %) and 17 to 20 (-34 %). However, terminal body weight was comparable in all groups, and corrected terminal body weight gain was also comparable in all groups. The effect on body weight gain on gestational days 17 - 20 is due to a significant decrease of the gravid uterus weight (-26 %), high rate of resorptions and distinctly lower mean fetal body weight, rather than maternal toxicity. The number of live fetuses per litter was significantly reduced and the postimplantation loss was 43 % compared to only 8 % in the control being statistically significant. The mean fetal body weight was reduced by 14 %. Further, the incidence of external malformations (anasarca and/or cleft palate) was significantly increased. About 10 % of the high dose fetuses were affected (13/132 fetuses; in 7/22 litters) while no such changes were observed in the control. Skeletal malformations were also statistically significantly increased: 7.8 % affected fetuses per litter (7/73 fetuses in 5/21 litters) were noted in the high dose group compared to 1.1 % in the control. The incidences of shortened scapula, bent radius, bent ulna, malpositioned and bipartite sternebrae were statistically significantly increased. Soft tissue variations (dilated renal pelvis and ureter) were significantly increased in fetuses from high dose dams compared to controls (27 % vs. 6.4 %). The incidences of skeletal variations, mainly delays of the ossification process, were statistically significantly increased from 91 % in the control group to 98.4 % in the high dose group. In historical control animals the mean occurrence of skeletal variations is 92.6 % (range 87.0-98.1 %). The NOAEL for maternal toxicity, developmental toxicity and teratogenicity was 60 mg/kg bw/d (BASF SE, 2002b). The LOAEL for maternal toxicity, developmental toxicity and teratogenicity can be set at 180 mg/kg bw/d.

In summary, it can be concluded that imidazole caused developmental toxicity and teratogenicity in in a prenatal developmental toxicity study in the rat according to OECD TG 414.

2.3 Current harmonised classification and labelling

2.3.1 Current classification and labelling in Annex VI, Table 3.1 in the CLP Regulation

No classification.

2.3.2 Current classification and labelling in Annex VI, Table 3.2 in the CLP Regulation

No classification.

2.4 Current self-classification and labelling

2.4.1 Current self-classification and labelling based on the CLP Regulation criteria

Classification

Acute Tox. 4, H302

Skin Corr. 1C, H314

Eye Damage 1, H318

Repr. 1B, H360D

Labelling

GHS05: corrosion

GHS07: exclamation mark

GHS08: health hazard

H302, H314, H360D, Dgr

Current self-classification and labelling based on DSD criteria

Classification

Repr. Cat 2; R61,

Xn; R22

C; R34

Labelling

T

R: 61-22-34

S: 22-26-36/37/39-45-53

3 JUSTIFICATION THAT ACTION IS NEEDED AT COMMUNITY LEVEL

The information available from acute toxicity testing in rats, revealing a LD50 value of 970 mg/kg bw, is indicating that imidazole is harmful after acute oral exposure. Imidazole was found to be corrosive to skin and caused severe eye damage in skin irritation/corrosivity testing performed in rabbits. Moreover, imidazole revealed teratogenic and developmentally toxic effects in rats treated with doses of 180 mg/kg bw/d. The effects observed included reduced number of life fetuses, reduced fetal body weight, external malformations, skeletal malformations and soft tissue variations.

Based on the results obtained from testing imidazole should be classified and labelled GHS07, Acute Tox. 4, H302; GHS05, Skin Corr. 1C, H314; Eye Damage 1, H318; and GHS08, Repr. 1B, H360D according to Regulation 1272/2008/EC (CLP) and Repr. Cat 2; R61, Xn; R22; C; R34 according to Directive 67/548/EEC (DSD). Notably, the classification of imidazole as CMR substance (Repr. Cat 2; R61) was already agreed by the European Chemicals Bureau in 2007. However, as there were open issues concerning classification of other endpoints, the classification was not finalised by EU. As the substance requires classification and labelling due to CMR properties, action at community level is required to ascertain a proper handling and RMMs for this substance. Further, it is recommended to harmonize not only the classification for the CMR property, but also for the other hazard classes as it was noted that in the EU Classification & Labelling Inventory a wide range of different classifications for acute toxicity irritation/corrosivity was submitted leading uncertainty about the correct classification and labelling. Therefore, a harmonised classification and labelling for this substance is considered a Community-wide action under Article 114 and it is recommended that the classification proposal is considered for inclusion on Annex I of Directive 67/548/EEC (i.e Annex VI of regulation 1272/2008).

RAC general comment

The hazard classes assessed by the RAC are those for which the Dossier Submitter (industry) provided a justification in the CLH dossier for action needed at community level (as required in Article 36(3) of the CLP Regulation):

- Reproductive toxicity
- Acute toxicity
- Skin corrosion/irritation
- Eye corrosion/irritation

Part B.

SCIENTIFIC EVALUATION OF THE DATA

1 IDENTITY OF THE SUBSTANCE

1.1 Name and other identifiers of the substance

Table 5: Substance identity

EC number:	206-019-2
EC name:	Imidazole
CAS number (EC inventory):	288-32-4
CAS number:	288-32-4
CAS name:	1H-Imidazole
IUPAC name:	1H-Imidazole
CLP Annex VI Index number:	
Molecular formula:	C3H4N2
Molecular weight range:	68.0773

Structural formula:



1.2 <u>Composition of the substance</u>

Table 6: Constituents (non-confidential information)

Constituent	Typical concentration	Concentration range	Remarks
• imidazole		>= 99.5 <= 99.9 %	
• EC no.: 206-019-2		(w/w)	

Current Annex VI entry: No classification

Table 7: Impurities (confidential information)

Impurity	Typical concentration	Concentration range	Remarks
Several		0.1 — 0.5 % (w/w)	

Table 8: Additives (non-confidential information)

range Remarks

Current Annex VI entry: Not applicable.

1.2.1 Composition of test material

Not applicable.

1.3 Physico-chemical properties

Table 9: Summary of physico - chemical properties

Property	Value	Reference	Comment (e.g. measured or estimated)
State of the substance at 20°C and 101,3 kPa	colorless to slightly yellow, crystalline		visual inspection
Melting/freezing point	89.8 °C	BASF SE, 1987	Measured
Boiling point	268.1 °C at 1013 hPa	BASF SE, 1987	Measured
Relative density	1.11 g/cm ³ at 95 °C 1.23 g/cm ³ at 27 °C	BASF SE, 1989 Reaxys Will, 1963	Measured
Vapour pressure	0.00327 hPa at 25 °C	BASF SE, 1987	Measured
Surface tension	not surface active		expert judgement
Water solubility	663 g/l at 20 °C	BASF SE, 1988	Measured
Partition coefficient n-octanol/water	-0.02 at 25 °C	BASF SE, 1988	Measured
Flash point	Not applicable		In accordance with section 1 of REACH Annex XI, the flash point does not need to be tested as the substance is a solid.
Flammability	not easily ignitable	BASF SE, 2006	Measured
Explosive properties	non explosive	BASF SE, 1974	Measured
Self-ignition temperature	480 °C	BASF SE, 1974	Measured
Oxidising properties	no oxidising properties		expert judgement
Granulometry	#1 < 4 µm 0 % #2 < 10 µm 0 % #3 < 100 µm 5.1 %	BASF SE, 2010	Measured
Stability in organic solvents and identity of relevant degradation products	not applicable		The stability of the substance is not considered as critical.
Dissociation constant	7.15 at 25 °C	Serjeant E.P., Dempsey B., 1979	Measured
Viscosity	not applicable		Substance is a solid at 20° C and atm. pressure.

2 MANUFACTURE AND USES

2.1 Manufacture

Confidential information.

2.2 Identified uses

Confidential information.

3 CLASSIFICATION FOR PHYSICO-CHEMICAL PROPERTIES

Based on results obtained classification and labelling for physical-chemical properties according to Regulation 1272/2008/EC (CLP) and Directive 67/548/EEC (DSD) is not justified.

4 HUMAN HEALTH HAZARD ASSESSMENT

4.1 Toxicokinetics (absorption, metabolism, distribution and elimination)

4.1.1 Non-human information

Table 10: Summary table of relevant studies on absorption, metabolism, distribution and elimination

Method	Results	Remarks	Reference
 rat (Wistar) male oral: gavage Doses: 16.6 mg/kg bw (single dose) Study was performed prior to the implementation of OECD Guideline 417. Rat plasma imidazole levels were examined after oral administration. No further pharmacokinetic parameters were studied. 	• Toxicokinetic parameters: Mean plasma levels (hrs after dosing): 0.25 h: 0.13 mmol/l (8.8 mg/l) 0.50 h: 0.13 mmol/l (8.8 mg/l) 1.00 h: 0.09 mmol/l (6.1. mg/l) 2.00 h: 0.03 mmol/l (2 mg/l) 4.00 h: not detectable	 2 (reliable with restrictions) supporting study experimental result Test material (EC name): imidazole 	Pagella PG et al. (1983)
 rat (Wistar) male intravenous Doses: 3 μmol/kg bw (0.204 mg/kg) equivalent or similar to OECD Guideline 417 (Toxicokinetics) 	 Metabolites identified: yes Details on metabolites: hydantoin, hydantoic acid 	 2 (reliable with restrictions) supporting study experimental result Test material (EC name): imidazole 	Ohta K et al. (1996)

4.1.2 Human information

Table 11 Summary table of relevant studies on absorption, metabolism, distribution and elimination

Method Results		Remarks	Reference
 human male oral tablet and/or drops Exposure regime: see "details on exposure" Doses/conc.: 750 mg of drug (containing 248 mg imidazole), or 3 times 750 mg drug/day for 3 -4 days (10 treatments) This was a cross-over study with four different groups for tablets and drops (single and multiple dosing). Each group consisted of 18 healthy male volunteers between 18-25 years of age having within 20% of their ideal body weight. Informed written consent was given after the purpose of the study and the nature of the compound was explained. 	 Toxicokinetic parameters: Cmax: 3.445 mg/l (mean; single dose tablets + drops) (Test No.: #1) Tmax: 0.75 h (mean; single dose tablets + drops) (Test No.: #1) AUC: 14.145 mg h/l (mean; single dose tablets + drops) (Test No.: #1) Half-life 2nd: 2.73 h (mean; single dose tablets + drops) (Test No.: #1) Cmax: 2.705 mg/l (mean; multiple dose tablets + drops) (Test No.: #2) Tmax: 0.595 h (mean; multiple dose tablets + drops) (Test No.: #2) AUC: 8.165 mg h/l (mean; multiple dose tablets + drops) (Test No.: #2) AUC: 8.165 mg h/l (mean; multiple dose tablets + drops) (Test No.: #2) Half-life 2nd: 1.99 h (mean; multiple dose tablets + drops) (Test No.: #2) Metabolites identified: yes Details on metabolites: The metabolites hydantoin and hydantoic acid were present in plasma and urine, although below the limit of detection as no radioactive label was used. 	 2 (reliable with restrictions) key study experimental result Test material (EC name): imidazole 	Kuemmerle H-P et al. (1987)

4.1.3 Summary and discussion on toxicokinetics

Human information

The pharmacokinetic profile, protein binding, relative bioavailability and metabolism of imidazole as the main component of the nonsteroidal antiinflammatory agent imidazole-2-hydroxybenzoate was studied in male subjects after single and multiple oral administration of tablets or drops. Groups of healthy male subjects (aged 18 to 25 years) of ideal body weight (within 20%), underwent comprehensive medical, biochemical and haematological examination before and after substance

administration. They were given one 750 mg tablet (containing 750 mg imidazole-2-hydroxybenzoate) or a single dose of 40 drops (containing a total of 400 mg imidazole-2-hydroxybenzoate). In the multiple-dose study, the subjects received three times one tablet or three times 40 drops/day for another two days starting 48 hours after the initial dose. On study day 4, only the morning dose was administered. Very large numbers of blood and urine samples were collected and comprehensive laboratory tests were performed. The maximum concentration (Cmax) of imidazole observed after single and multiple administration of the two dosage forms (tablets and drops), the times to maximum concentration (Tmax), and the plasma half-lives are summarised in the following table.

Table 12 Summary table of kinetic parameters after oral administration of imidazole.2-hydroxybenzoate

	Single adm	iinistration		Multiple ad	ministration
	Tablets	Drops	Dose	Tablets	Drops
C max ¹	3.59 +/- 0.96	3.3 +/- 1.22	A	2.87 +/- 0,84	2.67 +/- 1.22
			В	3.11 +/- 0.78	2.30 +/- 0.61
T max ²	0.79 +/- 0.54	0.71 +/- 0.59	A	1.04 +/- 0.5	0.96 +/- 0.67
			В	0.68 +/- 0.51	0.51 +/- 0.52
T _{1/2}	2.89 +/- 1.13	2.48 +/- 1.19	A	2.85 +/- 1.25	3.47 +/- 2.64
			В	1.86 +/- 0.78	2.12 +/- 0.91

¹ μg imidazole/ml plasma

A: first dose

B: 10th (last) dose

The parameters clearly show that peak plasma concentrations were rapidly attained following single or multiple administration of tablets or drops, thus indicating fast absorption. Plasma levels dropped very rapidly after attainment of the peak plasma concentration. The plasma half-lives of the two dosage forms were similar and no signs of accumulation were observed. Imidazole-2-hydroxybenzoate, the originally administered salt of imidazole and salicylic acid, was not found in the mono-drug form in either plasma or urine. Renal elimination of imidazole was approx. 10 to

² time to C max, in hours

15% of the dose. The protein binding of imidazole was 5 to 15%. The metabolites hydantoin and hydantoic acid were below the level of detection as no radioactive label was used. The decrease in plasma half-life seen after multiple administrations led the investigators to assume that imidazole had an enzyme inducing effect. The relative bioavailabilities of imidazole after single and multiple administrations were calculated as 138% and 113%, respectively. In a pilot study imidazole-2-hydroxybenzoate was applied as a 5% gel (82 mg imidazole in 5 g gel) to the forearm skin (area about 25 cm²) of four male volunteers to determine possible systemic influence. Neither imidazole-2-hydroxybenzoate nor imidazole, salicylic acid or salicyluric acid were found in urine up to 12 hours after application. Plasma samples were not examined. No adverse effects were seen either locally or systemically (Kuemmerle et al., 1987).

Further, basic information on plasma half-live of imidazole in men and woman was available. The administration of 750 mg imidazole-2-hydroxybenzoate as a tablet or suppository produced respective peak imidazole plasma concentrations 3.4 +/- 0.26 and 2.78 +/- 0.25 μ g/ml in 10 healthy subjects (4 men, 6 women). Maximum plasma concentrations were observed after 86.3 +/- 10.9 minutes (tablet) and 75.2 +/- 5.4 minutes (suppository). The half-lives of elimination from plasma were 1.70 +/- 0.19 hours (tablet) and 1.78 +/- 0.26 hours (suppository). Plasma samples were collected before administration and at 30, 60, 90, 120, 240, 360 and 480 minutes after administration (Noseda et al., 1988).

Non-human information

Following single oral administration of imidazole to Wistar rats (aged 2 months, n=4-5) at 0.24 mmol/kg bw (equivalent to 16.3 mg/kg bw), plasma imidazole levels were 8.9 μ g/ml after 0.25 and 0.5 hours, 6.1 μ g/ml after 1 hours and 2.0 μ g/ml after 2 hours. Imidazole was no longer detectable in plasma at 4 hours after administration. The limit of detection was 0.02 mmol/l (equivalent to 1.36 μ g/ml; Pagella et al., 1983).

Male Wistar rats (180-200g) treated with single intravenous dose of 3 μmol (150 μCi) [2-¹⁴C]imidazole excreted 14.0 +/- 2% of the radioactivity as unchanged imidazole, 38.7 +/- 0.7% as hydantoin, 31.0 +/- 1.2% as hydantoic acid and 4.0 +/- 0.4% as additional, structurally unidentified metabolites in the urine within the first 24 hours after administration. Pretreatment with the cytochrome P450 inhibitor SKF525-A increased the excretion of unmetabolized imidazole while at the same time reducing hydantoin and hydantoic acid, whereas pretreatment with the cytochrome P450 inducers 3-methylcholanthrene and phenobarbitone had no significant effect on urinary metabolites. The residual radioactivity at 24 hours after administration, given as nmol equivalents based on the amount of imidazole/g tissue or per ml body fluid, was located primarily in the liver (approx. 0.35 nmol/g), kidneys (approx. 0.12 nmol/g) and aorta (approx. 0.1 nmol/g). The levels of radioactivity found in plasma, blood, heart, lung, brain, muscle skin and cartilage were all below approx. 0.03 nmol per g or ml. The fatty tissue contained no detectable radioactivity. More detailed studies of the radioactivity retained in the aortic tissue revealed that it was essentially bound to elastin and that binding was enhanced by pretreatment with SKF525-A but was not affected by 3methylcholanthrene or phenobarbitone. In in-vitro studies, the radioactivity bound to elastin in the aortic tissue was dependent on cupro-ascorbate-catalysed reactions (Ohta et al., 1996)

Conclusion

The available pharmacokinetic studies in rat and human demonstrate that imidazole is rapidly and quantitatively absorbed after oral administration and metabolized in the liver to the main metabolites hydantoin and hydantoic acid. The half-live of elimination from human plasma was between 1.7 and 3.0 hours after a single dose. Imidazole did not accumulate in the body. Renal excretion was the predominant route of elimination. In the rat, 88 % of the administered

radioactivity was eliminated in the urine within 24 hours as imidazole (14%), hydantoin (39%), hydantoic acid (31%) and unidentified metabolites (4%). After dermal application of imidazole-2-hydroxybenzoate to human volunteers, neither the parent compound nor any metabolite was found in urine, indicating that bioavailability after dermal application is less than after oral administration.

4.2 Acute toxicity

The results of experimental studies are summarised in the following table:

Table 13: Summary table of relevant acute toxicity studies

Method	Results	Remarks	Reference
 rat oral: gavage equivalent or similar to OECD Guideline 401 (Acute Oral Toxicity) 	LD50: ca. 970 mg/kg bw	 2 (reliable with restrictions) key study experimental result Test material (EC name): imidazole 	BASF SE (1956a)

4.2.1 Non-human information

4.2.1.1 Acute toxicity: oral

In an acute oral toxicity study, the LD50 in rats was determined to be 970 mg/kg bw (BASF SE, 1956a). Groups of up to 5 animals (sex not specified) were treated with doses of 500, 700, 1000, 1260, 2000, 4000 and 5000 mg/kg bw and were observed for 7 days after dosing. From 1260 mg/kg bw onwards, the substance was lethal to all treated animals. At 1000 mg/kg bw and 700 mg kg bw mortality was 2/5 and 1/5, respectively. Deaths occurred within one day. The symptoms were described as convulsions and disequilibria with lateral posture. Apathy and accelerated respiration was noted in survivors. There was no difference in toxicity between imidazole of high purity when compared to a test with 95% imidazole (LD50 rat 960 mg/kg bw) which was performed under the same test conditions (BASF SE, 1956b).

4.2.1.2 Acute toxicity: inhalation

Data waiving

Justification: Imidazole is corrosive to the skin. According to REACH (1907/2006/EC) Annex VIII, 8.5, column 2, an acute inhalation toxicity study is not required if the substance is classified as corrosive to the skin.

4.2.1.3 Acute toxicity: dermal

Data waiving

Justification: Imidazole is corrosive to the skin. According to REACH (1907/2006/EC) Annex VIII, 8.5, column 2 an acute dermal toxicity study is not required if the substance is classified as corrosive to the skin.

4.2.1.4 Acute toxicity: other routes

No information available.

4.2.2 Human information

No information available.

4.2.3 Summary and discussion of acute toxicity

In an acute oral toxicity study, the LD50 in rats was determined to be 970 mg/kg bw (BASF SE, 1956a). Groups of up to 5 animals (sex not specified) were treated with doses of 500, 700, 1000, 1260, 2000, 4000 and 5000 mg/kg bw and were observed for 7 days after dosing. From 1260 mg/kg bw onwards, the substance was lethal to all treated animals. At 1000 mg/kg bw and 700 mg kg bw mortality was 2/5 and 1/5 animals, respectively. Deaths occurred within one day and the clinical symptoms were described as convulsions and disequilibria with lateral posture. Apathy and accelerated respiration was noted in survivors. There was no difference in toxicity between imidazole of high purity when compared to a test with 95% imidazole (LD50 rat 960 mg/kg bw) which was performed under the same test conditions (BASF SE, 1956b).

4.2.4 Comparison with criteria

Based on the oral LD50 value of 970 mg/kg bw obtained from testing in rats, imidazole meets the criteria to be classified Xn; R22 according to Directive 67/548/EEC and acute toxic category 4 with GHS07 according to Regulation 1272/2008/EC.

4.2.5 Conclusions on classification and labelling

Based on the results obtained in acute oral toxicity test, imidazole should be classified Xn; R22, harmful if swallowed and Category 4 H302, harmful if swallowed in accordance with Directive 67/548/EEC and Regulation 1272/2008/EC. As it has been noted that in the EU Classification & Labelling Inventory different classifications for acute toxicity were submitted, a harmonised classification and labelling for this substance is considered a Community-wide action and it is recommended that the classification proposal is considered for inclusion on Annex I of Directive 67/548/EEC (i.e Annex VI of regulation 1272/2008).

RAC evaluation of acute toxicity

Summary of the Dossier submitter's proposal

The Dossier Submitter proposed to classify imidazole as Acute Tox. 4; H302 (CLP) and Xn; R22 (DSD). This conclusion was based on two acute toxicity studies conducted in the rat by the oral route (BASF SE, 1956a and BASF SE, 1956b). No data was available by the inhalation or dermal routes.

In the key study (BASF SE, 1956a), rats (\leq 5/sex/dose) were administered 500, 700, 1000, 1260, 2000, 4000 or 5000 mg/kg bw imidazole (100% purity) via gavage. The LD₅₀

was reported as 970 mg/kg bw. Clinical signs included convulsions, disequilibria with lateral posture, apathy and accelerated respiration.

A similar LD_{50} value (960 mg/kg bw) was also reported in a supporting study (BASF SE, 1956b), conducted under similar test conditions, but with a lower purity substance (95% imidazole). No details on clinical effects were provided for this study.

Comments received during public consultation

Two MSCAs supported the proposed classification.

Assessment and comparison with the classification criteria

In two non-guideline acute oral toxicity studies, the LD_{50} values were estimated at 970 mg/kg bw and 960 mg/kg bw in rats. These values fall within the criteria for classification as Acute Tox. 4; H302 (CLP; 300< $LD_{50} \le 2000$ mg/kg bw) and Xn; R22 (DSD; 200< $LD_{50} \le 2000$ mg/kg bw).

Therefore, based on the available data, RAC agrees with the Dossier Submitter's proposal to classify imidazole as Acute Tox. 4; H302 (CLP) and Xn; R22 (DSD). No data were available on acute toxicity via the inhalation and dermal routes, therefore, no classification was proposed.

4.3 Specific target organ toxicity – single exposure (STOT SE)

4.3.1 Summary and discussion of Specific target organ toxicity – single exposure

The current available data does not require a classification with regard to this endpoint..

4.3.2 Comparison with criteria

Not applicable.

4.3.3 Conclusions on classification and labelling

Not required.

4.4 Irritation

4.4.1 Skin irritation

4.4.1.1 Non-human information

Available studies indicating corrosivity to the skin are summarised in section 4.5 corrosivity.

4.4.1.2 Human information

No information available.

4.4.1.3 Summary and discussion of skin irritation

See discussion on corrosivity in section 4.5.

4.4.1.4 Comparison with criteria

See section 4.5.

4.4.1.5 Conclusions on classification and labelling

See section 4.5.

4.4.2 Eye irritation

4.4.2.1 Non-human information

Available studies indicating corrosivity to the eye are summarised in section 4.5 corrosivity.

4.4.2.2 Human information

No information available.

4.4.2.3 Summary and discussion of eye irritation

See discussion on corrosivity in section 4.5.

4.4.2.4 Comparison with criteria

See section 4.5.

4.4.2.5 Conclusions on classification and labelling

See section 4.5.

RAC evaluation of skin corrosion/irritation

Summary of the Dossier submitter's proposal

The Dossier Submitter proposed to classify imidazole as Skin Corr. 1C; H314 (CLP) in and C; R34 (DSD). This proposal was based on an occluded patch test in rabbits exposed to imidazole (0.5 ml aqueous paste) for either 1-hour (4 animals or 4-hours (2 animals) (BASF SE, 1979a). The skin reactions observed after 1-hour and 4-hours exposure are detailed in Tables 2 and 3 below.

Table 1 Skin reactions after 1-hr exposure

Animal	Score (average of day 1, 2 and 8)/ Observations			
Number	Erythema	Oedema	Observations	
1	2.67*	<1	Necrotic spots on skin surface at the end of the observation period (day 8)	
2	0	0	Desquamation at the end of the observation period (day 8)	
3	1.33	1.33	Necrotic spots at the end of the observation period (day 8)	
4	1.67*	1.33	Necrotic spots on skin surface and desquamation at the end of the observation period (day 8)	

^{*}not fully reversible within the 8-day observation period.

Table 2: Skin reactions after 4-hr exposure

Animal	Score (average of day 1, 2 and 8)/ Observations			
Number	Erythema	Oedema	Observations	
1	4*	2*	Comprehensive parchment-like skin necrosis at the end of the observation period (day 8)	
2	4*	2.33*	Comprehensive leather-like skin necrosis at the end of the observation period (day 8)	

^{*}not fully reversible within the 8-day observation period.

Comments received during public consultation

Two Member State Competent Authorities (MSCAs) expressed their support for the Dossier Submitter's proposal. However, one MSCA suggested that classification in subcategory 1B would be more appropriate because the skin lesions observed after 1-hour exposure (necrotic spots and desquamation) had not fully reversed by the end of the 8-day observation period.

In response, the Dosser Submitter stated that residual signs observed after 1-hour exposure were identified (by macroscopic pathological investigation) as superficial lesions that do not constitute full thickness destruction, unlike the clear effects observed after 4-hours exposure.

Assessment and comparison with the classification criteria

In a skin irritation/corrosion study (BASF SE, 1979a), corrosive lesions (described as comprehensive leathery or parchment-like necrosis) were observed after 4-hours exposure(2 animals) to 80% aqueous paste imidazole (0.5 ml). One hour exposure (4 animals), resulted in mild erythema (average scores 0-2.67) and oedema (0-1.33), but the lesions (superficial necrotic spots and/or desquamation) observed at the end of the observation period (day 8) were confirmed not to constitute full thickness destruction of the skin tissue. Therefore, RAC confirms that the available data meet the criteria for classification as Skin Corr. 1C; H314 (corrosion occurs after > 1-hour $- \le$ 4-hours exposure) and C; R34 (corrosion occurs after > 3-mins $- \le$ 4-hours exposure) in accordance with CLP and DSD, respectively.

RAC evaluation of eye corrosion/irritation

Summary of the Dossier submitter's proposal

The Dossier Submitter proposed to classify imidazole as Eye Dam. 1; H318 in accordance with the CLP Regulation. No classification was proposed in accordance with the DSD.

This proposal was based on an acute eye irritation/corrosion test in rabbit eyes exposed to 0.1 g unchanged imidazole (99% purity) (BASF SE, 1979b). The eye reactions observed in this study are detailed in Table 4 below:

Table 4-

Animal	Score (average of 24, 48 and 72 hours)/ Observations					
Number	Cornea	Cornea Iris Conjunctivae Chemosis Secretion				
1	2	1	2	2	2.33	
2	2	1	2	2	1.33	
3	2	1	2	2	3	

All reactions had not fully reversed by the end of the study. The grade 2 reddening/swelling of the conjunctiva was accompanied by chemosis, which increased to grade 3 by the end of the 8-day observation period. Corneal opacity (grade 2) also persisted to day 8 and affected more than three-quarters of the cornea. Therefore, the Dossier Submitter concluded that the irreversible tissue damage and persistent large size cornea opacity indicate that imidazole is severely irritating to corrosive to the rabbit eye.

Comments received during public consultation

One MSCA expressed their support for the Dossier Submitter's proposal. However, another Member State noted that the ECHA guidance indicates that classification for eye irritation/corrosion is not required for substances already classified as Skin Corr. 1C.

Assessment and comparison with the classification criteria

Although the recorded scores (average 24, 48 and 72 hours) for corneal opacity and iritis were below the cut off for classification as Eye Dam. 1; H318 and the study observation period was <21 days, the eye reactions did not reverse or reduce within the 8-day observation period. Accordingly, RAC agreed that imidazole meets the criteria for classification as Eye Dam. 1; H318. However, since imidazole is to be classified as Skin Corr. 1C, classification is not required for this endpoint according to the current guidance and practice. RAC therefore agreed not to classify imidazole for Eye Dam. 1; H318 due to classification as Skin Corr. 1C, noting however, that classification for severe eye damage for substances already classified as Skin Corr. 1C is subject to an ongoing review of the quidance on the application of the CLP criteria.

4.4.3 Respiratory tract irritation

4.4.3.1 Non-human information

No information available.

4.4.3.2 Human information

No indication that would require classification and labelling with regard to this endpoint.

4.4.3.3 Summary and discussion of respiratory tract irritation

No information available.

4.4.3.4 Comparison with criteria

Not applicable.

4.4.3.5 Conclusions on classification and labelling

Not required.

4.5 Corrosivity

4.5.1 Non-human information

The results of experimental studies on skin and eye irritation related to corrosivity are summarised in the following table:

Table 14: Summary table of relevant corrosivity studies

after substance instillation	
• 2.33 of max. 3 (animal #1) not fully reversible within 8d	
• 1.33 of max. 3 (animal #2) not fully reversible within 8d	
• 3 of max. 3 (animal #3) not fully reversible within: 8d	

4.5.2 Human information

No information available.

4.5.3 Summary and discussion of corrosivity

Skin irritation/corrosion

In a patch test, the clipped dorsal skin of six rabbits (White Vienna) was exposed to a patch (2 cm x 2 cm) loaded with 0.5 ml of an aqueous paste of imidazole (imidazole concentration 80%) for 1 hour (4 animals) or 4 hours (2 animals) ("corrosion test"). Upon removal of the patch, the treated skin area was washed with polyethylene glycol 400 and subsequently with a mixture of polyethylene glycol 400 and water (1:1). Immediately after 4-hour exposure, the 2 exposed rabbits exhibited severe reddening of the area of exposure and beyond, accompanied by severe oedema. Soft necrosis and marked oedema were observed 24 hours after application. Mild oedema and necrosis with a parchment-like or leathery appearance were still visible at the end of the 8-day post exposure observation period. No signs of absorptive intoxication were observed after 4 hours of exposure. Imidazole was considered corrosive based on the results obtained after 4-hours of exposure. After the 1 hour exposure under occlusive dressing mild erythema was seen in all (4/4) animals. Mild erythema and mild oedema were observed on the following two days of the study. The oedema resolved completely by day 8 of the post-exposure observation period. Residual signs included patchy, superficial necrotic lesions in addition to scaling. On the basis of the results obtained after 1 hour exposure, no substance specific destruction of skin tissue, namely visible necrosis through the epidermis and into the dermis, was observed (BASF SE, 1979a).

Eye irritation/corrosion

Application of 0.1 g unchanged imidazole to the rabbit eye (BASF SE, 1979b) affected iris, conjunctiva, cornea, and the nictating membrane of the animals. Grade 2 reddening and swelling of the conjunctiva was noted along with chemosis which aggravated and persisted to grade 3 until day 8. Corneal opacity of grade 2 persisted until the end of the observation period on day 8. The affected corneal area comprised more than 3/4. The observed manifestations of irreversible tissue damage and persistent large size cornea opacity indicate that imidazole is severely irritating to corrosive to the rabbit eye.

4.5.4 Comparison with criteria

The skin irritation/corrosive potential of imidazole was tested in a skin/irritation/corrosion study equivalent or similar to OECD Guideline 404. Animals were treated for 1 and 4 h with a subsequent observation period of 8 days. After treatment of 1 hour mild erythema and mild oedema were

observed during the first two days but resolved until the end of the observation period. After treatment of 4 hours soft necrosis and marked oedema were observed 24 h after application. Mild oedema and necrosis with a parchment-like or leathery appearance were still visible at the end of the 8-day post exposure observation period.

The eye irritation/corrosive potential of imidazole was tested in an eye irritation/corrosion study equivalent or similar to OECD Guideline 405. Application of 0.1 g unchanged imidazole to the rabbit's eye affected iris, conjunctiva, cornea, and the nictating membrane of the animals. The substance caused irreversible tissue damage and persistent large size cornea opacity.

In conclusion, imidazole meets the criteria to be classified C; R34 according to Directive 67/548/EEC and GHS05, skin corrosive Category 1C, H314 and causes severe eye damage Category 1, H318 according to Regulation 1272/2008/EC.

4.5.5 Conclusions on classification and labelling

Based on the results obtained in animal tests, imidazole was classified C; R34 (causes burns) and Category 1C H314 (causes severe skin burns and eye damage) in accordance with Directive 67/548/EEC and Regulation 1272/2008/EC. As it has been noted that in the EU Classification & Labelling Inventory different classifications for irritation/corrosivity were submitted, a harmonised classification and labelling for this substance is considered a Community-wide action and it is recommended that the classification proposal is considered for inclusion on Annex I of Directive 67/548/EEC (i.e Annex VI of regulation 1272/2008).

4.6 Sensitisation

4.6.1 Skin sensititsation

Imidazole is corrosive to the skin. According to REACH (1907/2006/EC) Annex VII, 8.3, column 2 an in vivo skin sensitisation test is not required if the substance is classified for skin corrosivity.

4.6.1.1 Non-human information

No information available.

4.6.1.2 Human information

No information available.

4.6.1.3 Summary and discussion of skin sensitisation

Imidazole is corrosive to the skin. According to REACH (1907/2006/EC) Annex VII, 8.3, column 2 an in vivo skin sensitisation test is not required if the substance is classified for skin corrosivity.

4.6.1.4 Comparison with criteria

Not applicable.

4.6.1.5 Conclusions on classification and labelling

Not applicable

4.6.2 Respiratory sensitisation

4.6.2.1 Non-human information

No information available.

4.6.2.2 Human information

No information available.

4.6.2.3 Summary and discussion of respiratory sensitisation

No information available.

4.6.2.4 Comparison with criteria

Not applicable.

4.6.2.5 Conclusions on classification and labelling

Not required.

4.7 Repeated dose toxicity

The results of experimental studies are summarised in the following table:

Table 15: Summary table of relevant repeated dose toxicity studies

Method	Results	Remarks	Reference
 rat (Wistar) male/female subchronic (oral: gavage) 0, 20, 60, 180 mg/kg bw/d (actual ingested) exposure: 90 d Test substance was administered daily by gavage using 3 and 5 ml syringes for about 13 weeks. OECD Guideline 408 (Repeated Dose 90-Day Oral Toxicity in Rodents) 	 NOAEL: 60 mg/kg bw/d nominal, males/females LOAEL: 180 mg/kg bw/d nominal, males/females treatment related adverse effects at 180 mg/kg bw/d; lesions identified liver (slight centrilobular liver cell hypertrophy) and kidney as the target organs (alpha 2-microglobulin accumulation) 	 1 (reliable without restriction) key study experimental result Test material (EC name): imidazole 	 BASF SE (2002a) BASF SE (2004)
 rat (Sprague-Dawley) male/female subacute (oral: gavage) 0; 62.5; 125; 250; 500 mg/kg bw/d Exposure: 28 days (5x/wk) 	NOAEL: 62.5 mg/kg bw/d (nominal) (male/female)	 2 (reliable with restrictions) supporting study Test material (EC name): imidazole 	BASF SE (1976)

4.7.1 Non-human information

4.7.1.1 Repeated dose toxicity: oral

Subchronic effects of imidazole were determined in a 90-day study in Wistar rats according to OECD TG 408. This study examined the systemic and specific organ toxicity, ophthalmologic effects, effects on male and female reproductive organs, and effects on behaviour and sensomotoric capabilities which were examined in a series of tests delineated as the Functional Observation Battery (FOB). Imidazole was given daily by gavage dissolved in water at 20, 60 and 180 mg/kg bw/d. Liver and the male kidney were identified as target organs in the animal groups receiving 180 mg/kg bw/d as substantiated by significantly increased relative liver weights in males (+7.5 %) and females (+2.6 %) which correlated with minimal to slight centrilobular liver cell hypertrophy in males (9/10 animals affected) and females (2/10). In the kidneys, the absolute and relative weights in high-dose males were significantly increased which was accompanied by an accumulation of alpha 2-microglobulin in the epithelia and lumina of the proximal tubules of the male rat renal cortex. The alpha 2-microglobulin was detected by Mallory Heidenhain staining technique and specificity for alpha 2-microglobulin could be demonstrated by immunohistochemical staining (BASF SE, 2004). The accumulation of this protein appears to be a unique feature of male rats and is not known to occur in other species, including man. Additionally, significant changes in parameters of blood chemistry were noted in high dose animals as substantiated by decreased serum globulin and chloride in male rats, and total protein, albumin, globulin, and chloride in females. No other substance-related effect was noted in the 90-day study at 180 mg/kg bw/d; i. e. mortality, clinical observation for signs of toxicity, body weight, body weight development and food consumption, clinical chemistry other than noted above, pathology and histopathology of the numerous organs examined were not affected. Also, no effects were noted during ophthalmologic examinations or the FOB tests. Male and female reproductive organs were not affected (including histopathology), as were sperm quality parameters (sperm number, motility, and morphology were determined in testis, epididymides and estrus cycle). No substance-related effect was noted at the intermediate and at the low dose level. Therefore, the no observed adverse effect level (NOAEL) was 60 mg/kg bw per day in both sexes under the conditions of this study (BASF SE, 2002a). The lowest observed adverse effect level (LOAEL) can be set at 180 mg/kg bw/d for males and females based on the findings in the liver (minimal to slight centrilobular hypertrophy) of both sexes and the kidney effects (alpha 2-microglobulin accumulation) in males.

In addition to the liver and the kidney, red blood cells were identified as a target in a 4-week rat study (oral gavage, groups at 0, 62.5, 125, 250, and 500 mg/kg bw per day) in Sprague Dawley rats when hemoglobin was significantly decreased in females at a dose of 125 mg/kg bw per day and above. Hematocrit and the numbers of erythrocytes were also significantly decreased (p<0.05) in females at a dose of 250 mg/kg bw per day and above. In male rats hemoglobin and hematocrit were significantly reduced only at the high dose (BASF SE, 1976). The effect on red blood cells was, however, not confirmed in the more recent 90-day guideline study described above when rats received up to 180 mg/kg bw per day.

4.7.1.2 Repeated dose toxicity: inhalation

No data available

4.7.1.3 Repeated dose toxicity: dermal

No data available

4.7.1.4 Repeated dose toxicity: other routes

No data available.

4.7.1.5 Human information

No information available.

4.7.1.6 Other relevant information

No information available.

4.7.1.7 Summary and discussion of repeated dose toxicity

Oral route:

Subchronic effects of imidazole were determined in a 90-day study in Wistar rats according to OECD TG 408. This study examined systemic and specific organ toxicity, ophthalmologic effects, effects on male and female reproductive organs, and effects on behaviour and sensomotoric capabilities which were examined in a Functional Observation Battery (FOB). Imidazole was given daily by gavage at 20, 60 and 180 mg/kg bw/d. Liver and the male kidney were identified as target organs in the animal groups receiving 180 mg/kg bw/d as substantiated by significantly increased relative liver weights in males (+7.5 %) and females (+2.6 %) which correlated with minimal to slight centrilobular liver cell hypertrophy in males (9/10 animals affected) and females (2/10). In the kidneys, the absolute and relative weights in high-dose males were significantly increased which was accompanied by an accumulation of alpha 2-microglobulin in the epithelia and lumina of the proximal tubules of the male rat renal cortex. The alpha 2-microglobulin was detected by Mallory

Heidenhain staining technique and specificity could be demonstrated by immunohistochemical staining (BASF SE, 2004). The accumulation of this protein appears to be a unique feature of male rats and is not known to occur in other species, including man. Additionally, significant changes in parameters of blood chemistry were noted in high dose animals as substantiated by decreased serum globulin and chloride in male rats, and total protein, albumin, globulin, and chloride in females. No other substance-related effect were observed. In particular, no effects were noted during ophthalmologic examinations or the FOB tests. Male and female reproductive organs were not affected as shown by histopathology, as were sperm quality parameters and estrus cycle unchanged. No substance-related effect was noted at the intermediate and at the low dose level. Therefore, the no observed adverse effect level (NOAEL) was 60 mg/kg bw/d in both sexes and the LOAEL was 180 mg/kg bw/d under the conditions of this study (BASF SE, 2002a).

In addition to the liver and the kidney, red blood cells were identified as a target in a 4-week rat study (oral gavage, groups at 0, 62.5, 125, 250, and 500 mg/kg bw per day) in Sprague Dawley rats when hemoglobin was significantly decreased in females at a dose of 125 mg/kg bw per day and above. Hematocrit and the numbers of erythrocytes were also significantly decreased in females at a dose of 250 mg/kg bw per day and above. In male rats hemoglobin and hematocrit were significantly reduced only at the high dose (BASF SE, 1976). The effect on red blood cells was, however, not confirmed in the more recent 90-day guideline study described above when rats received up to 180 mg/kg bw per day.

4.7.1.8 Summary and discussion of repeated dose toxicity findings relevant for classification according to DSD

The administration of imidazole to rats by gavage for 90 days caused treatment-related findings only at the highest dose level only (180 mg/kg bw/d), the lesions identifying the liver and kidneys as the target organs. The NOAEL was 60 mg/kg bw/d and is, thus, comparable with the NOAEL found in the 28-day rat study using the same route of administration.

4.7.1.9 Comparison with criteria of repeated dose toxicity findings relevant for classification according to DSD

Regarding the dose levels leading to toxicity in a reliable oral 90-day study as well as the quality of findings it can be concluded that imidazole is not subject to classification for repeated dose or specific target organ toxicity according to Directive 67/548/EEC.

4.7.1.10 Conclusions on classification and labelling of repeated dose toxicity findings relevant for classification according to DSD

Based on the available data imidazole is not subject to classification for repeated dose or specific target organ toxicity according to Directive 67/548/EEC.

RAC evaluation of reproductive toxicity

Summary of the Dossier submitter's proposal

Fertility

No one or two-generation studies were available for imidazole. However, reproductive

parameters (including histopathology of the male and female reproductive organs and an assessment of sperm numbers/morphology) were assessed in a 90-day repeated dose toxicity study, conducted in rats (Wistar) via oral gavage (0, 20, 60 or 180 mg/kg bw/day) (BASF SE, 2002a). No changes were observed in the weight and histopathology of reproductive organs (including uterus, ovaries, oviducts, vagina, female mammary glands, left testis, left epididymis, prostate gland and seminal vesicles) and sperm/oestrus cycle parameters were unaffected. Therefore, the Dossier Submitter concluded that imidazole had no effect on these reproductive parameters up to 180 mg/kg bw/day.

In an earlier investigative study (Adams *et al*, 1998), increasing doses of imidazole (three doses between 10 and 300 mg/kg bw) were subcutaneously injected into adult rats (10/group). Samples of serum and testicular interstitial fluid were collected after 2 hours of exposure. Imidazole suppressed both testosterone function and testicular interstitial fluid at 30 mg/kg bw and above. However, the Dosser Submitter considered that this study was of limited relevance because: 1) subcutaneous injection does not represent a relevant route of exposure, 2) the injection site is not known, 3) only one time point was assessed and 4) no microscopic examination of the testes was performed.

The Dossier Submitter did not propose classification for fertility.

Development

The Dossier Submitter proposed to classify imidazole as Repr. 1B; H360D and Repr. Cat. 2; R61 in accordance with CLP and DSD, respectively. This proposal was based on a prenatal developmental toxicity study (OECD 414; BASF SE, 2002b) and an *in vitro* whole cell embryo test (Daston *et al*, 1989).

In the key study (BASF SE, 2002b), pregnant Wistar rats were administered (oral, gavage) 0, 20, 60 or 180 mg/kg bw/day imidazole during days 6-19 of gestation. At the top dose, signs of maternal toxicity (transient), fetotoxicity and teratogenicity were reported. These effects are described further below:

Maternal toxicity - Significant reductions in food intake ($\downarrow 13\%$ relative to controls) and body weight gain ($\downarrow 45\%$ relative to controls) were observed at 180 mg/kg bw/day on days 6-8. Reduced body weight gain ($\downarrow 34\%$ relative to controls) was also reported on days 17-20. However, the Dosser Submitter concluded that this was due to decreased gravid uterus weight, high resorption rates and a lower mean fetal body weight, rather than maternal toxicity. Terminal body weights (actual and corrected) were comparable to controls. Additional clinical signs included transient salivation (6 females) and vaginal haemorrhage (1 female).

Fetotoxicity – A statistically significant reduction in the number of live foetuses per dam was observed as a consequence of increased post-implantation loss (43.4% compared to 7.9% in the controls) at the top dose. 3/24 females resorbed all implants, producing no live foetuses at necropsy. Due to an increased number of runts, mean fetal weight was also reduced ($\downarrow 14\%$ relative to controls) at the top dose.

Teratogenicity- A statistically significant increase in the incidence of external malformations (anasarca and/or cleft palate) was observed, affecting 10% of foetuses in 7/21 litters at the top dose. No incidences of anasarca or cleft palate were reported in the control, low and mid dose groups.

The number of skeletal malformations (including shortened scapula, bent radius, bent ulna, malpositioned and bipartite sternebrae) was also increased at the top dose with 1.1, 2.3, 0.9 and 7.8% of foetuses affected per litter at 0, 20, 60 and 180 mg/kg bw/day, respectively. The incidence of affected litters was 4.5, 9.1, 4.3 and 24% at 0, 20, 60 and

180 mg/kg bw/day, respectively.

Soft tissue variations (dilated renal pelvis and ureter: 6.4, 9.2, 22.7 and 27.1% affected foetuses per litter at 0, 20, 60 and 180 mg/kg bw/day, respectively) and skeletal variations (primarily delays in ossification: 91.1, 87.2, 94.2 and 98.4 at 0, 20, 60 and 180 mg/kg bw/day, respectively) were also significantly increased in foetuses of the top dose dams. The incidence of skeletal variations slightly exceeded the historical control range at the highest dose (87.0 - 98.1%, lab, number of studies and date data were collected was not specified).

The Dossier Submitter concluded that the incidences of malformations (external, skeletal and total malformations) and several soft tissue and skeletal variations were statistically significantly increased and clearly above the historical control values. However, the historical control values for external (anasarca and/or cleft palate), skeletal and total malformations were not provided in the CLH report.

Limited details were also provided for a supporting study (Daston *et al*, 1989), in which cultures of rat and mouse embryos were exposed to 30 or 60 μ g/ml imidazole (no details on exposure time). Exposure to imidazole resulted in a reduced yolk sac diameter, crown rump length and decreased brain size in $\leq 100\%$ of embryos. Mortality was reported as 83%.

A comparison with the classification criteria was initially missing from the CLH report, but was provided after the public consultation period (see below).

Comments received during public consultation

One Member State Competent Authority expressed their support for the Dossier Submitters proposal. Another supported the proposal but asked for some additional information/clarification and a comparison with the classification criteria. One Member State Competent Authority did not agree with the NOAEL set by the Dossier Submitter and another stated that a conclusion on the classification for fertility could not be made in the absence of a multi-generation study.

In response to these comments the Dossier Submitter provided additional information/data, which is outlined in the RCOM and summarised below (see additional key elements).

Additional key elements

Additional key information submitted by the Dossier Submitter after the public consultation period included a separation of the total resorption data into early and late resorptions, the historical control data for soft tissue variations and a comparison with the classification criteria.

The dosser submitter clarified that there was a statistically significant increase in the number of late resorptions at the high dose (3.1 \pm 2.76 versus 0.1 \pm 0.29 in the controls). However, no significant change was observed in the number of early resorptions, indicating that the reported effects were the consequence of fetal death rather than embryo lethality.

The historical control data provided by the Dossier Submitter for soft tissue variations were as follows: mean affected foetuses/litter range 4.4 - 22.2%, mean 11.6%, from 142 litters and 614 foetuses in studies conducted in a time frame of 6 months before the study.

As requested, the Dosser Submitter provided a comparison with the criteria for developmental toxicity and concluded that imidazole caused clear signs of developmental

toxicity and teratogenicity in a rat prenatal developmental toxicity study (according to OECD TG 414). The observed signs of maternal toxicity at the dose level which caused signs of developmental toxicity and teratogenicity (180 mg/kg bw/day) was considered less than marked and included transient salivation, vaginal haemorrhage (one dam on day 20 p.c), significantly reduced food intake and significantly reduced body weight gain at the beginning of treatment. In addition, the same dose produced only mild liver effects in a sub-chronic gavage study in female rats. Thus, comparable findings can also be assumed in this embryo-fetal toxicity study even if the dams were not actually examined. Therefore, the Dosser Submitter proposed that developmental toxicity and teratogenicity in the offspring were not a secondary non-specific consequence of maternal toxicity, and accordingly classification in Category 1B is justified for reproductive toxicity according to CLP.

Assessment and comparison with the classification criteria

<u>Fertility</u>

No one- or two-generation studies were available. However, treatment with imidazole did not affect the weight or histopathology of reproductive organs (including uterus, ovaries, oviducts, vagina, female mammary glands, left testis, left epididymis, prostate gland and seminal vesicles) and/or sperm/oestrus cycle parameters in the rat 90-day repeated dose toxicity study, conducted up to 180 mg/kg bw/day (oral gavage).

An investigative study (Adams et~al, 1998), involving the subcutaneous injection of imidazole in adult rats (10/group) suggested that imidazole may suppress male hormone secretion and testicular function. However, this study had significant flaws (administration by an irrelevant route of exposure, limited reporting detail and a lack of microscopic examination in the testes) and is consequently considered to be of limited relevance for classification and labelling.

The RAC noted that since no sexual function and fertility studies were submitted for imidazole, the available data do not allow for an assessment of whether e.g. mating behaviour or sexual maturation would have been affected and therefore whether imidazole might adversely affect fertility. |However, considering that no changes in reproductive parameters were observed in the 90-day repeated dose toxicity study, RAC agreed that the available data did not support classification for sexual function and fertility.

Development

RAC agreed with the Dossier Submitter that the following findings support the proposal to classify imidazole for developmental toxicity:

• Increased post implantation loss and reduced fetal body weight

At the top dose in the only available pre-natal developmental toxicity study, there was a statistically significant increase in post implantation loss (43% compared to 8% in the controls) and total resorption in 3/24 females. As a result, the number of live foetuses per litter was statistically significantly reduced, indicating that 180 mg/kg bw day imidazole caused fetal toxicity. In addition, an increase in the number of runts and a reduced mean fetal weight (\downarrow 14%) was observed at the top dose. As these findings occurred at a dose level that caused only minimal maternal toxicity, they are not considered to be secondary to non-specific maternal toxicity.

• Increased number of external and skeletal malformations

A statistically significant increase in the incidence of external malformations (anasarca and/or cleft palate: affecting 10% of foetuses in 7/21 litters) and skeletal malformations (including shortened scapula, bent radius, bent ulna, malpositioned and bipartite sternebrae: affecting 7.8% foetuses in 24% litters) were observed at the top dose. No incidences of anasarca or cleft palate were reported in the control, low and mid dose

groups and the incidences of skeletal malformations in the other dose groups were low (incidence of affected foetuses per litter: 1.1, 2.3 and 0.9% of at 0, 20, and 60 mg/kg bw/day, incidence of affected litters: 4.5, 9.1 and 4.3% at 0, 20 and 60 mg/kg bw/day). These findings occurred at a dose causing only minimal maternal toxicity and are consequently considered to be independent of secondary non-specific maternal toxicity.

The following findings are also considered to provide supportive information for classification:

- Increased incidence of soft tissue and skeletal variations
- The incidence of total soft tissue (predominantly dilated renal pelvis and ureter) variations were significantly increased at the mid and top dose levels and skeletal variations (delays in ossification) were increased at the top dose level. These incidences were just outside of the historical control range and are consequently considered treatment related.
- Embryo toxicity in rat and mouse whole cell embryo cultures Embryo toxicity was also observed in an *in vitro* whole embryo test, in which exposure of rat and mouse embryo to 30 and 60 μ g/ml imidazole resulted in embryo lethality and abnormalities (decreased yolk sac diameter and brain size).

In conclusion, RAC agrees with the Dossier Submitter that these findings represent clear evidence of an adverse effect on development, which is not considered to be secondary to the minimal non-specific maternal toxicity observed in the rat prenatal developmental study. Therefore, RAC considers that the available data on imidazole support classification as Repr. 1B; H360D.

On a similar basis, a classification of Repr. Cat. 2; R61 is recommended under DSD.

4.8 Specific target organ toxicity (CLP Regulation) – repeated exposure (STOT RE)

4.8.1 Summary and discussion of repeated dose toxicity findings relevant for classification as STOT RE according to CLP Regulation

The administration of imidazole to rats by gavage for 90-dayays caused only minor treatment-related findings at the highest dose level (180 mg/kg bw/d) tested, the lesions identifying the liver and kidneys as the target organs with at least some effects considered as rat specific leasions. The NOAEL was 60 mg/kg bw/d and is thus comparable with the NOAEL found in the 28-day rat study using the same route of administration.

Regarding the dose levels leading to toxicity in a reliable oral 90-day study as well as the quality of findings it can be concluded that imidazole is not subject to classification for repeated dose or specific target organ toxicity according to Regulation 1272/2008/EC.

4.8.2 Comparison with criteria of repeated dose toxicity findings relevant for classification as STOT RE

Based on the available data imidazole is not subject to classification for repeated dose specific target organ toxicity according to Regulation 1272/2008/EC.

4.8.3 Conclusions on classification and labelling of repeated dose toxicity findings relevant for classification as STOT RE

Based on the available data imidazole is not subject to classification for repeated dose specific target organ toxicity according to Regulation 1272/2008/EC.

4.9 Germ cell mutagenicity (Mutagenicity)

The results of experimental studies are summarised in the following table:

Table 16: Summary table of relevant in vitro and in vivo mutagenicity studies

Method	Results	Remarks	Reference
Point mutation assay Bacterial reverse mutation assay (Ames test) Salmonella typhimurium TA1535, TA100, TA1537, TA98 metabolic activation: with and without Doses 1st experiment: Standard plate test: 0, 20, 100, 500, 2500, 5000 µg/plate tested with all tester strains. Solvent was aqua dest. 2nd experiment: Preincubation test: 0, 20, 100, 500, 2500, 5000 µg/plate tested with all tester strains. Preincubation test: 0, 20, 100, 500, 2500, 5000 µg/plate tested with all tester strains. 3 plates per dose and control. OECD Guideline 471 (Bacterial Reverse Mutation Assay) (adopted 26-May-1983)	negative for all S. typhimurium strains tested with and without metabolic activation	I (reliable without restriction) key study experimental result Test material (EC name): imidazole	Reference BASF SE (1992)
 Point mutation assay Bacterial reverse mutation assay (Ames test) S. typhimurium tester strains TA97, TA98, TA100, TA102 Metabolic activation: with and without Doses: 0.625, 1.25, 2.5, 5, 10 mg/plate equivalent or similar to OECD Guideline 471 (Bacterial Reverse Mutation Assay) 	negative for all tested S. typhimurium strains with and without metabolic activation	 2 (reliable with restrictions) supporting study Test material (EC name): imidazole 	Forster R et al. (1992)
 Point mutation assay Mammalian cell gene mutation assay Chinese hamster lung fibroblasts (V79) Metabolic activation: with and without Doses: Experiment 1 (4h treatment) without S9 mix: 21.9, 43.8, 87.5, 175.0, 350.0, 700.0 μg/mL with S9 mix: 21.9, 43.8, 87.5, 175.0, 350.0, 700.0 μg/mL 	 negative Test results: negative for Chinese hamster lung fibroblasts (V79) with and without metabolic activation; cytotoxicity: not observed (up to 10 mM) 	 1 (reliable without restriction) key study experimental result Test material (EC name): imidazole 	HARLAN (2010)

Experiment 2 (24h and 4h treatment) without S9 mix: 21.9, 43.8, 87.5, 175.0, 350.0, 700.0 μg/mL (24h) with S9 mix: 43.8, 87.5, 175.0, 350.0, 525.0, 700.0 μg/mL (4h) 700.0 μg/mL is equivalent to the limit concentration of 10 mM test substance • OECD Guideline 476 (In vitro Mammalian Cell Gene Mutation Test)			
 DNA damage and repair assay Unscheduled DNA synthesis in mammalian cells in vitro Rat hepatocytes Doses: 0.25, 0.5, 1, 2, 4 mg/ml equivalent or similar to OECD Guideline 482 (Genetic Toxicology: DNA Damage and Repair, Unscheduled DNA Synthesis in Mammalian Cells In Vitro) 	 negative cytotoxicity at approx. 1 mg/ml 50% cell survival 	 2 (reliable with restrictions) key study experimental result Test material (EC name): imidazole 	Forster R et al. (1992)
 In vivo Micronucleus assay Male/female mouse (NMRI) oral: gavage 500, 1000, 2000 mg/kg bw (suspended in 10 ml olive oil/kg bw) (nominal conc.) OECD Guideline 474 (Mammalian Erythrocyte Micronucleus Test) 	 negative (male/female); clinical signs of systemic toxicity were present at all dose levels 	 1 (reliable without restriction) key study experimental result Test material (EC name): imidazole 	BASF SE (1993)

4.9.1 Non-human information

4.9.1.1 In vitro data

Imidazole was tested in the standard Ames test and in the pre-incubation Ames test conducted under GLP and according to the OECD TG 471. The substance was tested with Salmonella typhimurium TA 1535, TA 100, TA 1537, and TA 98 both in the presence and absence of metabolic activation in concentrations up to $5000 \, \mu g/plate$. No mutagenic or bacteriotoxic effect was noted up to the limit test concentration (BASF SE, 1992).

Furthermore, imidazole and its metabolites hydantoin, hydantoic acid, and N-acetyl-imidazole were also negative in a standard-plate Ames-test equivalent to the OECD TG 471 with S. typhimuriumTA 97, TA 98, TA 100, and TA 102 in the presence and absence of metabolic

activation. Test substance concentrations were up to and including 10 000 μ g/plate without reaching cytotoxicity (Forster et al., 1992).

In addition, a mammalian gene mutation test according to OECD 476 and GLP in V79 Chinese hamster cells (HPRT locus) was conducted with imidazole. The assay was performed in two independent experiments, using two parallel cultures each. The first main experiment was performed with and without liver microsomal activation and a treatment period of 4 hours. The second experiment was performed with a treatment time of 4 hours with and 24 hours without metabolic activation. The maximum concentration was 700.0 µg/mL, corresponding to a molar concentration of about 10 mM of the test item. 7,12-dimethylbenz(a) anthracene (DMBA) and Ethylmethane sulfonate (EMS) were used as positive controls in experiment with and without metabolic activation, respectively. Positive as well as negative controls gave expected results. Imidazole did not induce gene mutations at the HPRT locus in V79 cells. Therefore, imidazole is considered to be non-mutagenic in this HPRT assay (Harlan, 2010).

Imidazole did not induce Unscheduled DNA Synthesis (UDS) in rat primary hepatocytes. The test method used was equivalent to the OECD TG 482. The test substance concentrations (0.25, 0.5, 1, 2, 4 mg/ml) reached the cytotoxic concentration range. Cell survival was 50 % at 1 mg/ml (Forster et al., 1992).

4.9.1.2 In vivo data

Imidazole hydrochloride was tested in a micronucleus test in accordance with the OECD TG 474 under GLP conditions in mice, dosed once by gavage with 500, 1000, and 2000 mg/kg bw/d. The salt imidazole hydrochloride dissociates into protonated imidazole and chloride in the stomach following oral gavage and did not induce micronuclei at any dose or any harvesting time, which were set at 16, 24, and 48 hrs after dosing. The animals showed signs of systemic toxicity at 500 mg/kg bw and above confirming the systemic availability of the test item which is in line with the toxicokinetic data. The number of polychromatic and normochromatic erythrocytes was not statistical significantly different from the control, therefore it may be concluded, that imidazole was not toxic to the bone marrow. Imidazole was found to be not clastogenic or aneugenic in this test (BASF SE, 1993).

4.9.2 Human information

No information available.

4.9.3 Other relevant information

No information available.

4.9.4 Summary and discussion of mutagenicity

1.) in-vitro studies:

Imidazole was tested in the standard Ames test and in the pre-incubation Ames test conducted under GLP and according to the OECD TG 471. The substance was tested with Salmonella typhimurium TA 1535, TA 100, TA 1537, and TA 98 both in the presence and absence of metabolic activation in concentrations up to 5000 μ g/plate. No mutagenic or bacteriotoxic effect was noted (BASF SE, 1992).

Furthermore, imidazole and its metabolites hydantoin, hydantoic acid, and N-acetyl-imidazole were also negative in a standard-plate Ames-test equivalent to the OECD TG 471 with S. typhimurium TA 97, TA 98, TA 100, and TA 102 in the presence and absence of metabolic activation. Test substance concentrations were up to and including 10 000 μ g/plate without reaching cytotoxicity (Forster et al., 1992).

In addition, a mammalian gene mutation test according to OECD 476 and GLP in V79 Chinese hamster cells (HPRT locus) was conducted with imidazole. The first main experiment was performed with and without liver microsomal activation and a treatment period of 4 hours. The second experiment was performed with a treatment time of 4 hours with and 24 hours without metabolic activation. The maximum concentration was $700.0~\mu g/mL$, corresponding to a molar concentration of about 10 mM of the test item. Imidazole did not induce gene mutations and was considered to be non-mutagenic in the HPRT assay (Harlan, 2010).

Imidazole did not induce Unscheduled DNA Synthesis (UDS) in rat primary hepatocytes. The test method used was equivalent to the OECD TG 482. The test substance concentrations (0.25, 0.5, 1, 2, 4 mg/ml) reached the cytotoxic concentration range. Cell survival was 50 % at 1 mg/ml (Forster et al., 1992).

2.) in-vivo study:

Imidazole hydrochloride was tested in a micronucleus test in accordance with the OECD TG 474 under GLP conditions in mice, dosed once by gavage with 500, 1000, and 2000 mg/kg bw/d. The substance did not induce micronuclei at any dose or any harvesting time at 16, 24, and 48 hrs after dosing. The animals showed signs of toxicity at 500 mg/kg bw and above. The number of polychromatic and normochromatic erythrocytes was not statistical significantly different from the control. Imidazole was found to be neither clastogenic nor aneugenic in the mouse micronucleus test (BASF SE, 1993).

4.9.5 Comparison with criteria

There is no hint for any mutagenic properties of imidazole, neither *in vitro* nor *in vivo*. No mutagenicity was observed in two Ames tests and a HPRT Test with V79 cells. No unscheduled DNA synthesis was induced in primary rat hepatocytes. No clastogenic or aneugenic effects were found in the mouse micronucleus test in-vivo. Therefore, imidazole is considered to be non-mutagenic.

4.9.6 Conclusions on classification and labelling

No genetic toxicity in vitro and in vivo. No classification and labelling is required.

4.10 Carcinogenicity

4.10.1.1 Non-human information

4.10.1.2 Carcinogenicity: oral

No information available.

4.10.1.3 Carcinogenicity: inhalation

No information available.

4.10.1.4 Carcinogenicity: dermal

No information available.

4.10.1.5 Human information

No information available.

4.10.1.6 Other relevant information

No mutagenic effects noted in vitro and in vivo mutagenicity tests.

4.10.1.7 Summary and discussion of carcinogenicity

Based on data from valid in vitro and in vivo mutagenicity tests, a genotoxic carcinogenic potential is not expected or indicated.

4.10.1.8 Comparison with criteria

Not applicable.

4.10.1.9 Conclusions on classification and labelling

No classification and labelling with regard to carcinogenic effects required.

4.11 Toxicity for reproduction

The results of experimental studies are summarised in the following table:

Table 17: Summary table of relevant reproductive toxicity studies

Method Results		Remarks	Reference	
 OECD Guideline 414 (Prenatal Developmental Toxicity Study) rat (Wistar) oral: gavage 0, 20, 60, 180 mg/kg bw/d (nominal conc.) Exposure: Test substance was administered by oral gavage once a day from implantation to one day prior to expected parturition, i.e. d 6-19 p.c. (7 d/wk) 	NOAEL (maternal toxicity): 60 mg/kg bw/d (decreased food consumption, body weight gain and uterus weight at 180 mg/kg bw/d) NOAEL (fetotoxicity): 60 mg/kg bw/d (reduced mean fetal weight and increased number of resorptions at 180 mg/kg bw/d) NOAEL (teratogenicity): 60 mg/kg bw/d (increased rate of variations and malformations at 180 mg/kg bw/d)	 1 (reliable without restriction) key study experimental result Test material (EC name): imidazole 	BASF SE (2002b)	
 In-vitro study (teratogenicity screen). Whole embryo culture (rat and mouse embryos) 	Some indication of developmental effects in presence of high mortality	Investigative study3 (not reliable)	Daston GP et al. (1989)	
Effects of imidazoles on testosterone secretion and testicular intestinal fluid formation after s.c. injection	Imidazole suppressed testosterone secretion and TIF formation	 Investigative study reporting and methodology does not comply with OECD TG guideline standards 3 (not reliable) 	Adams ML et al. (1998)	

4.11.1 Effects on fertility

4.11.1.1 Non-human information

There is no one- or two-generation reproductive toxicity study available. However, in an OECD TG 408 conforming 90-day gavage study in rats, male and female reproductive organs were examined (including histopathology), as were sperm quality parameters and morphology determined in testis and epididymides. In this study, no changes in weight and histopathology of reproductive organs (uterus, ovaries, oviducts, vagina, female mammary gland, left testes, left epididymis, prostate gland, seminal vesicles) were found at all dose levels. Moreover, the test substance did not cause any effects on sperm parameters (motility, morphology, head count in cauda epididymis and testis)

and oestrus cycle. From these results, it can be concluded that imidazole had no adverse effect on the reproductive organs up to the highest tested dose of 180 mg/kg bw/d (BASF SE, 2002a).

In an investigative, non-guideline study, increasing doses (three doses between 10-300 mg/kg bw) of imidazole were injected in adult rats (10 rats per group), and samples of serum and testicular intestinal fluid (TIF) were collected 2 hours later (Adams ML et al., 1998). It was reported that imidazole suppressed the two major regulating aspects of testicular function (testosterone secretion and TIF formation) at 30 mg/kg bw and higher and can suppress LH secretion regulating systems in the pituitary in rats at 300 mg/kg bw. The authors concluded that the findings support the hypothesis that imidazoles can suppress male reproductive function. With regard to hazard assessment, the findings reported by Adams et al. (1998) are considered to be of limited relevance because the subcutaneous route does not represent a relevant exposure route, and there was no indication of any adverse effect on male reproductive organs and sperm quality in the 90-day oral gavage study according to OECD TG 408 mentioned above. Furthermore, the reliability of the publication is poor due to the insufficient methodology and documentation, e.g. the s. c. injection site is not indicated in the publication, only one time point (2 hours after treatment) was studied and detailed results for imidazole and controls as well as historical control data are missing. In addition, statistical significance of findings was only evaluated at p<0.05, but not at p<0.01 study and no microscopical examination of the testes was performed.

4.11.1.2 Human information

No information available.

4.11.2 Developmental toxicity

4.11.2.1 Non-human information

In a prenatal developmental study conducted in accordance with OECD TG 414, imidazole (purity 99.8%) was administered by oral gavage to Wistar rats from day 6 to 19 of gestation. The dose levels were 0, 20, 60 or 180 mg/kg bw/d. A standard dose volume of 10 ml/kg bw was used for each group. The control group, consisting of 25 females, was dosed with the vehicle only (doubly distilled water). During the study the dams were assessed for clinical observations, body weight and food consumption, and corrected body weight was determined upon necropsy. On day 20 post coitum, dams were sacrificed and examined for gross pathological changes (including weight determinations of the unopened uterus and the placentae), the number of corpora lutea in the ovaries, conception rate, the number of live fetuses and pre- and post-implantation losses. The fetuses were weighed, sexed and macroscopically examined for external alterations. One half of all fetuses were fixed and examined for effects on the inner organs, while the other half of fetuses were fixed and stained for skeletal and cartilage evaluation.

The following substance-related findings were obtained (see also tables 18 and 19). There were no signs of maternal toxicity, fetal or developmental toxicity noted at the low and mid dose (20 and 60 mg/kg bw/d). At 180 mg/kg bw/d, transient salivation in 6 females was observed between days 15 to 19 p.c. and vaginal hemorrhage in one dam on day 20 p.c. The food intake was significantly reduced (-13 %) when the treatment was started. This was reflected by a statistical significantly reduced body weight gain on gestational days 6 to 8 (-45 %) and 17 to 20 (-34 %). However, terminal body weight was comparable in all groups, and corrected terminal body weight gain was also comparable in all groups. The effect on body weight gain on gestational days 17 to 20 is due to a significant decrease of the gravid uterus weight (-26 %), high rate of resorptions (see below) and

distinctly lower mean fetal body weight (see below), rather than maternal toxicity. The number of live fetuses per litter was significantly reduced and the post-implantation loss was 43 % compared to only 8 % in the control being statistically significant. Three of 24 pregnant dams resorbed all implants and had no live fetuses at necropsy.

Table 18: Group mean reproductive and fetal data

Dose levels (mg/kg bw/d)	0	20	60	180
Pregnancies on day 20	22	24	23	24
Conception rate	88	96	92	96
Dams with viable fetuses	22	22	23	21
Gravid uterus weight (g)	51.3 (9.52)	45.6 (16.65)	50.0 (11.57)	38.2 (16.81)**
Implantations/dam	9.7 (1.67)	9.0 (2.1)	9.7 (1.69)	9.3 (1.88)
Pre-implantation loss (%)	10.7 (14.07)	18.5 (20.84)	14.5 (13.33)	15.7 (12.46)
Post-implantation loss (%)	7.9 (10.13)	14.8 (28.31)	9.6 (11.77)	43.4 (34.09) **
Resorptions (total)	0.8 (1.05)	0.9 (1.23)	0.9 (1.12)	3.8 (3.06) **
Live fetuses/dam	8.9 (1.61)	8.8 (1.68)	8.8 (1.93)	6.3 (3.15) **
Fetal weight (g) (all viable)	3.7 (0.27)	3.6 (0.2)	3.6 (0.32)	3.2 (0.27) **
Placental weights (mg) (all viable fetuses)	460 (62)	450 (46)	490 (57)	560 (173) **
Sex ratio (% males)	53	41	52	46

SD in brackets

Examination of the live fetuses from high dose dams revealed no changes with respect to sex distribution. The mean fetal body weight was reduced by 14 % due to a higher number of stunted fetuses (so-called runts). Further, the incidence of external malformations (anasarca and/or cleft palate) was significantly increased. About 10 % of the high dose fetuses were affected (13/132 fetuses; in 7/21 litters (= 33%)) while no such changes were observed in the control. Skeletal malformations were also statistically significantly increased: 7.8 % affected fetuses per litter (7/73 fetuses in 5/21 litters (=24%)) were noted in the high dose group compared to 1.1 % in the control. The incidences of shortened scapula, bent radius, bent ulna, malpositioned and bipartite sternebrae were statistically significantly increased. Soft tissue variations (dilated renal pelvis and ureter) were significantly increased in fetuses from high dose dams compared to controls (27 % vs. 6.4 %). The incidences of skeletal variations, mainly delays of the ossification process, were statistically significantly increased from 91 % in the control group to 98.4 % in the high dose group. In historical control animals the mean occurrence of skeletal variations is 92.6 % (range 87.0-98.1 %).

In summary, there were statistically significantly increased rates of total malformations (10.8% versus 0.6% affected fetuses/litter in the control group), variations (70.4% versus 52.0% affected

^{**} p < = 0.01 (Dunnett test) (two-sided)

fetuses/litter in the control group) and unclassified skeletal cartilage observations (69.8% versus 50.8% affected fetuses/litter in the control group.

Table 19 Summary of all classified fetal external, soft tissue, and skeletal observations

Parameter	No. and (%) fetuses at (mg/kg bw/d)			
	0	20	60	180
No. litters evaluated	22	22	23	21
No. fetuses evaluated	195	194	202	132
Total malformations, mean (%) (affected fetuses/litter)	0.6 (3.05)	1.1 (3.68)	0.5 (2.32)	10.8 (14.67) **
Total variations, mean (%) (affected fetuses/litter)	52 (11.51)	50 (13.24)	61 (15.8)	70.4 (20.64) **
Unclassified skeletal cartilage observations, mean %, (affected fetuses/litter)	50.8 (29.2)	42.9 (38.11)	51.2 (28.95)	69.8 (28.79) **
External malformations, mean - litter incidence (%) - affected fetuses/litter (%)	0 0	0 0	0 0	33 ## 9 (15.08) **
Skeletal malformations, mean - litter incidence (%) - affected fetuses/litter (%)	4.5 1.1 (5.33)	9.1 2.3 (7.36)	4.3 0.9 (4.17)	24 7.8 (15.95) *
Soft tissue variations, mean - affected fetuses/litter (%)	6.4 (16.25)	9.2 (17.02)	22.7 (29.69) *	27.1 (35.05) *
Skeletal variations, mean - affected fetuses/litter (%)	91.1 (14.91)	87.2 (16.1)	94.2 (9)	98.4 (7.27) *

SD in brackets

From this prenatal developmental toxicity study, it can be concluded that the oral administration of imidazole to pregnant Wistar rats from implantation to one day prior to the expected day of parturition (days 6 - 19 p.c.) elicited substance-related signs of maternal toxicity at 180 mg/kg bw/d. A total of 6 rats of this group showed transient salivation (being most likely indicative for slight irritations of the upper digestive tract) during some days of the treatment period. Moreover, vaginal haemorrhage occurred in another high dose dam, which resorbed all of its implants, just before scheduled sacrifice. At initiation of dosing the high dose dams showed statistically significant impairments in food consumption (about 13% below the control) and impaired body weight gains (about 45% below the control) on days 6 - 8 p.c. Moreover, high dose body weight gains were also statistically significantly diminished (33% - 34% below the control) on days 17 - 20 p.c. and the mean gravid uterus weight was distinctly affected (about 26% below the control) due to a high resorption rate and a markedly lower mean fetal body weight at 180 mg/kg bw/d. According

^{*} p < = 0.05 (Wilcoxon-test, one-sided), ** p < = 0.01 (Wilcoxon-test, one-sided)

^{##} p < = 0.01 (Fischer's exact test, one-sided)

to the scope of parameters examined in the present prenatal developmental toxicity study, the administration of 180 mg imidazole/kg bw/d to pregnant rats induced adverse effects on the dams. Concerning gestational parameters, there was a high rate of resorptions at the top dose, which led to a clearly elevated post-implantation loss value, but no substance-induced effects on the gestational parameters occurred at 20 or 60 mg/kg bw/d. At the highest dose level (180 mg/kg bw/d) clear signs of developmental toxicity, including indications of teratogenicity, were obtained. Mean placental weights and the number of stunted fetuses were clearly increased, whereas the mean fetal body weights were about 14% below the corresponding control value. The external, skeletal and consequently the overall malformation rate and the incidences for several soft tissue and certain skeletal variations were statistically significantly increased and clearly above historical control values. At 20 and 60 mg/kg bw/d, however, no substance induced signs of embryo-/fetotoxicity, especially no indications of teratogenicity, were observed. Based on these results, the no observed adverse effects level (NOAEL) for maternal and prenatal developmental toxicity is 60 mg/kg bw/d (BASF SE, 2002b).

4.11.2.2 Human information

No information available.

4.11.3 Other relevant information

Some indication of developmental toxicity was obtained in a whole embryo culture test when rat and mouse embryos were exposed in vitro to imidazole at 30 and 60 μ g/ml in vitro. The findings of this teratogenicity screen included reduced yolk sac diameter and crown rump length, and decreased brain size observed in up to 100 % of treated embryos. Mortality was up to 83 % in this exploratory study (Daston et al., 1989).

4.11.4 Summary and discussion of reproductive toxicity

Effects on fertility

One- or two-generation studies for imidazole are not available. However, parameters relevant to assess effects on fertility were included in a 90-day repeated toxicity study conducted according to OECD TG 408 (BASF SE, 2002a), in which Wistar rats (10 animals per sex and dose group) were dosed with 0, 20, 60, 180 mg imidazole/kg bw/d via gavage. In this study, no changes in weight and histopathology of reproductive organs (uterus, ovaries, oviducts, vagina, female mammary gland, left testes, left epididymis, prostate gland, seminal vesicles) were found at any dose levels. Moreover, the test substance did not cause any effects on sperm parameters (motility, morphology, head count in cauda epididymis and testis) and estrus cycle.

In an investigative, non-guideline study, three doses between 10-300 mg/kg bw) of imidazole were injected in adult rats, and samples of serum and testicular intestinal fluid (TIF) were collected two hours later (Adams ML et al., 1998). It was reported that imidazole suppressed testosterone secretion and TIF formation at 30 mg/kg bw and higher and could suppress LH secretion regulating systems in the pituitary in rats at 300 mg/kg bw. With regard to hazard assessment, these findings are considered to be of limited relevance because the subcutaneous route does not represent a relevant exposure route, and there was no indication of any adverse effect on male reproductive organs and sperm quality in the 90-day gavage study according to OECD TG 408. Furthermore, the reliability of the publication is poor due to the insufficient methodology applied and the limited documentation of methods and results.

Developmental toxicity

In a prenatal developmental study conducted in accordance with OECD TG 414, imidazole (purity 99.8%) was administered by oral gavage to Wistar rats from day 6 to 19 of gestation. The dose levels were 0, 20, 60 or 180 mg/kg bw/d. The control group, consisting of 25 females, was dosed with the vehicle water only. The dams were assessed for clinical observations, body weight and food consumption, and corrected body weight was determined upon necropsy. On day 20 p.c., dams were sacrificed and examined for gross pathological changes (including weight determinations of the unopened uterus and the placentae), the number of corpora lutea in the ovaries, conception rate, the number of live fetuses and pre- and post-implantation losses. The fetuses were weighed, sexed and macroscopically examined for external alterations. One half of all fetuses were fixed and examined for effects on the inner organs, while the other half of fetuses were fixed and stained for skeletal and cartilage evaluation.

There were no signs of maternal toxicity, fetal or developmental toxicity noted at 20 and 60 mg/kg bw/d. At 180 mg/kg bw/d, transient salivation in 6 females was observed between days 15 to 19 p.c. and vaginal hemorrhage in one dam on day 20 p.c. The food intake was significantly reduced by -13 % when the treatment was started. This was reflected by a statistical significantly reduced body weight gain on gestational days 6 to 8 (-45 %) and 17 to 20 (-34 %). However, terminal body weight was comparable in all groups, and corrected terminal body weight gain was also comparable in all groups. The effect on body weight gain on gestational days 17 to 20 is due to a significant decrease of the gravid uterus weight (-26 %), high rate of resorptions and distinctly lower mean fetal body weight, rather than maternal toxicity. The number of live fetuses per litter was significantly reduced and the post-implantation loss was 43 % compared to only 8 % in the control being statistically significant. Three of 24 pregnant dams resorbed all implants and had no live fetuses at necropsy.

From this prenatal developmental toxicity study, it can be concluded that the oral administration of imidazole to pregnant Wistar rats from implantation to one day prior to the expected day of parturition elicited substance-related signs of maternal toxicity at the highest dose (180 mg/kg bw/d). A total of 6 rats of this group showed transient salivation (being most likely indicative for slight irritations of the upper digestive tract) during some days of the treatment period. Moreover, vaginal haemorrhage occurred in another high dose dam, which resorbed all of its implants, just before scheduled sacrifice. At initiation of dosing, the high dose dams showed statistically significant impairments in food consumption (about 13% below the control) and impaired body weight gains (about 45% below the control) on days 6 - 8 p.c. Moreover, high dose body weight gains were also statistically significantly diminished on days 17 - 20 p.c. and the mean gravid uterus weight was distinctly affected (about 26% below the control) due to a high resorption rate and a markedly lower mean fetal body weight at 180 mg/kg bw/d. According to the scope of parameters examined in the present prenatal developmental toxicity study, the administration of 180 mg imidazole/kg bw/d to pregnant rats induced adverse effects on the dams. Concerning gestational parameters there was a high rate of resorptions at the top dose, which led to a clearly elevated postimplantation loss value, but no substance-induced effects on the gestational parameters occurred at 20 or 60 mg/kg bw/d. At the highest dose level (180 mg/kg bw/d) clear signs of developmental toxicity, including indications of teratogenicity, were obtained. Mean placental weights and the number of stunted fetuses were clearly increased, whereas the mean fetal body weights were about 14% below the corresponding control value. The external, skeletal and consequently the overall malformation rate and the incidences for several soft tissue and certain skeletal variations were statistically significantly increased and clearly above historical control values. At 20 and 60 mg/kg bw/d, however, no substance induced signs of embryo-/fetotoxicity, especially no indications of

teratogenicity, were observed. Based on these results, the no observed adverse effects level (NOAEL) for maternal and prenatal developmental toxicity is 60 mg/kg bw/d (BASF SE, 2002).

Some indication of developmental toxicity was obtained in a whole embryo culture test when rat and mouse embryos were exposed in vitro to imidazole at 30 and 60 μ g/ml in vitro. The findings of this teratogenicity screen included reduced yolk sac diameter and crown rump length, and decreased brain size observed in up to 100 % of treated embryos. Mortality was up to 83 % in this exploratory study (Daston et al., 1989).

4.11.5 Comparison with criteria

Imidazole caused developmental toxicity and teratogenicity in the rat in a prenatal developmental toxicity study according to OECD TG 414. There were no indications of a possible fertility impairing potential from a reliable 90-day oral gavage study in rats up to the highest dose level (180 mg/kg bw/d) with thorough histopathological examination of all male and female reproductive organs, sperm and estrus cycle analysis.

4.11.6 Conclusions on classification and labelling

Based on these results imidazole may cause damage to the unborn child and is classified and labelled Repr. Cat. 2; R61 according to Directive 67/548/EEC and Repr 1B, H360D, GHS08 according to Regulation 1272/2008/EC. This classification was already agreed in the EU in 2007 (ECB). However as there were open issues concerning classification of other endpoints, the classification was not finalized by EU before REACH was implemented.

4.12 Other effects

4.12.1 Non-human information

4.12.1.1 Neurotoxicity

No effects noted in a valid 90-day subchronic toxicity study according to OECD TG 408 (see 4.7.1.1).

4.12.1.2 Immunotoxicity

No information available.

4.12.1.3 Specific investigations: other studies

No information available.

4.12.1.4 Human information

No information available.

4.12.2 Summary and discussion

No information available.

4.12.3 Comparison with criteria

Not applicable.

4.12.4 Conclusions on classification and labelling

Not required.

5 ENVIRONMENTAL HAZARD ASSESSMENT

Not relevant for this dossier. No classification and labelling proposed based on available data.

6 OTHER INFORMATION

This substance has been registered according to the requirements of the REACH legislation. In addition, the substance is currently under evaluation in the framework of the Community Rolling Action Plan (CoRAP). The evaluation has been foreseen for the year 2012 and the listing was based on concerns regarding human health due to CMR properties wide dispersive use and high tonnage.

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8 ANNEXES

None