EUROPEAN CHEMICALS AGENCY

~~Confidential~~

Helsinki, 2 June 2021

Addressees
Registrants of JS_142-84-7_Dipropylamine as listed in the last Appendix of this decision

Date of submission of the dossier subject to this decision
23 January 2014

Registered substance subject to this decision ("the Substance")
Substance name: Dipropylamine
EC number: 205-565-9
CAS number: 142-84-7

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

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below, by the deadline of ***9 March 2022***.

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

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

1. In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.; test method: EU B.13/14. / OECD TG 471)

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

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

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

Reasons for the requests are explained in the appendix entitled "Reasons to request information required under Annexes VII of REACH".

Information required depends on your tonnage band

You must provide the information listed above for all REACH Annexes applicable to you, and in accordance with Articles 10(a) and 12(1) of REACH, the information specified in Annex VII to REACH, for registration at 1-10 tonnes per year (tpa), or as a transported isolated intermediate in quantity above 1000 tpa.

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

How to comply with your information requirements

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

You must follow the general testing and reporting requirements provided under the Appendix entitled "Requirements to fulfil when conducting and reporting new tests for REACH purposes". In addition, you should follow the general recommendations provided under the Appendix entitled "General recommendations when conducting and reporting new tests for REACH purposes". For references used in this decision, please consult the Appendix entitled "List of references".

Appeal

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

Failure to comply

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

Authorised[1] under the authority of Christel Schilliger-Musset, Director of Hazard Assessment

[1] As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Appendix A: Reasons to request information required under Annex VII of REACH

1. In vitro gene mutation study in bacteria

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

You have provided the following information:

i. a non-guideline *in vitro* gene mutation study in bacteria (Zeiger *et al.*, 1987) with the Substance and the following strains, *S. typhimurium* TA 98, TA 100, TA 1535, TA 1537 which all gave negative results.

We have assessed this information and identified the following issue:

To fulfil the information requirement, a study must comply with OECD TG 471[2] (1997). Therefore, the following specifications must be met:

a) the test must be performed with 5 strains: four strains of *S. typhimurium* (TA98; TA100; TA1535; TA1537 or TA97a or TA97) and one strain which is either *S. typhimurium* TA102 or *E. coli* WP2 uvrA or *E. coli* WP2 uvrA (pKM101);
b) the maximum dose tested must induce a reduction in the number of revertant colonies per plate compared to the negative control, or the precipitation of the tested substance. If no precipitate or limiting cytotoxicity is observed, the highest test dose must be 5 mg/plate or 5 ml/plate;
c) the number of revertant colonies per plate for the concurrent negative control must be inside the historical control range of the laboratory.

Your registration dossier provides an OECD TG 471 showing the following:

a) the results from an appropriate 5 strains (i.e. *S. typhimurium* TA102 or *E. coli* WP2 uvrA or *E. coli* WP2 uvrA (pKM101)) are not provided;
b) the maximum does tested was 3333 µg/plate (hence below 5 mg/plate). You have not indicated that this dose led to a reduction in the number of revertant colonies compared to the negative control or to the precipitation of the test material. You only reported cytotoxicity in TA 100 at this dose level;
c) you have provided no information whether the negative controls were inside the historical control range of the laboratory.

Based on the above,

- there are critical methodological deficiencies resulting in the rejection of the study. More specifically:
  - the study does not provide information on the required fifth strain (*i.e.*, S. typhimurium TA102 or E. coli WP2 uvrA or E. coli WP2 uvrA (pKM101));
  - you have not provided adequate justification for the selection of the highest dose tested, except for strain TA 100.
- the reporting of the study is not sufficient to conduct an independent assessment of its reliability. More specifically you have not provided supporting information on the historical control range of the laboratory.

Therefore, the specifications of OECD TG 471 are not met.

On this basis, the information requirement is not fulfilled.

[2] ECHA Guidance R.7a, Table R.7.7-2, p.557

Study design

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

2. Short-term toxicity testing on aquatic invertebrates

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

You have provided the following information:

i. an EU C.2 key study on the Substance ([redacted], 1988);
ii. an OECD TG 211 study on the analogue substance diethylamine (EC No. 203-716-3) ([redacted] 1999) which could be regarded as an adaptation under Annex VII, Section 9.1.1., Column 2, second indent in conjunction with Annex XI, Section 1.5.

Additonally, in your comments on the draft decision, you proposed to adapt this information requirement under Annex XI, Section 1.5. ('Grouping of substances and read-across approaches'). In support of your adaptation you provided the following information:

iii. a reference to an OECD TG 202 study on the analogue substance diethylamine (EC No. 203-716-3) ([redacted], 2000a).

We have assessed this information and identified the following issues:

A. Evaluation of the available information on the Substance

To fulfil the information requirement, a study must comply with OECD TG 202 and the requirements of OECD GD 23 (ENV/JM/MONO(2000)6/REV1) if the substance is difficult to test (Article 13(3) of REACH). Therefore, the following specifications must be met:

Characterisation of exposure

- a reliable analytical method for the quantification of the test material in the test solutions with reported specificity, recovery efficiency, precision, limits of determination (i.e. detection and quantification) and working range must be available;
- the concentrations of the test material are measured at least at the highest and lowest test concentration, at the beginning and end of the test under conditions that are consistent with the test conditions;
- the effect values can only be based on nominal or measured initial concentration if the concentration of the test material has been satisfactorily maintained within 20 % of the nominal or measured initial concentration throughout the test (see also ECHA Guidance R.7b, Section R.7.8.4.1);

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

- no analytical monitoring of exposure concentrations was included;
- an evaluation of losses via evaporation was conducted by monitoring the TOC content of a stock solution at 100 mg/L nominal over 48 hours. Measured values were stable and the mean measured value was determined to be 79.2 mg/L.

Based on the above, there are critical methodological deficiencies resulting in the rejection of the results of this study. More specifically, you have not demonstrate that exposure was satisfactorily maintained during the experiment as:

- it is unclear if this estimate was obtained under conditions that are consistent with the test conditions;
- a non-specific analytical method (i.e. TOC measurement) was used;
- this estimate was obtained at 100 mg/L nominal and do not inform on potential losses of the test material at lower concentrations;
- you have not assessed losses that could originate from adsorption of the test material under the test conditions. The test material is ionisable and therefore potentially highly adsorptive.

Furthermore, we note that measured values differed by over 20% of nominal concentration and that this additional experiment indicate significant losses at some stage of the process. Therefore, this information does not provide reliable evidence that exposure was satisfactorily maintained during the test.

In the absence of an adequate and reliable estimation of exposure concentrations, this study does not meet the specifications of OECD TG 202 in conjunction with OECD GD 23.

In your comments on the draft decision, you explain that the publication by BASF AG, 1988 (study i.) does not contain the information listed above. Therefore, you indicate that you will no longer use this information as key study to cover the information requirement for the Substance.

B. Evaluation of your read-across adaptation for short-term toxicity on aquatic invertebrates

You seek to adapt the information requirement for short-term toxicity on aquatic invertebrates under Annex VII, Section 9.1.1., column 2, second indent by providing a long-term toxicity study on aquatic invertebrates and thereby applying a read-across approach in accordance with Annex XI, Section 1.5.

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

Additional information on what is necessary when justifying a read-across approach can be found in the ECHA Guidance R.6. and related documents[3,4].

You have not provided a read-across justification document in your registration dossier. However, in your comments on the draft decision, you have provided a read-across justification document as an attachement to your comments.

You read-across between the structurally similar substances, diethylamine (DEA), EC No. 203-716-3, (CAS No. 109-89-7), as source substances and the Substance as target substance.

[3] Read-Across Assessment Framework (RAAF). 2017 (March) ECHA, Helsinki. 60 pp. Available online: Read-Across Assessment Framework (https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across)
[4] Read-across assessment framework (RAAF) - considerations on multi-constituent substances and UVCBs. 2017 (March) ECHA, Helsinki. 40 pp. Available online: https://doi.org/10.2823/794394

In your comments on the draft decision, you have provided the following reasoning for the prediction of long-term toxicity on aquatic invertebrates:

- The target and source substances are structurally similar: "*they consist of a secondary amine group with ligated alkyl groups; they differ only in the length of the ligated alkyl chains*". You specify that the structural similarity was calculated to be 50% using the the QSAR Toolbox v4.3.1;
- The target and source substances are manufactured as high-purity substances. Therefore, they do not contain impuritites relevant for classification and labelling or the PBT/vPvB assessment;
- you justify the expected common mode of action based on similar mechanistic similarity as illustrated by several mechanistic profilers from the QSAR Toolbox v4.3.1 and, the USEPA New Chemical Categories and the Aquatic Toxicity Classification by ECOSAR and the Acute Aquatic Toxicity Mode of Action (MOA) of OASIS. With regard to mode of action you refer to the QSAR Toolbox v4.3 which state that "*the longer (or greater the number of carbons) the chain the more toxic to aquatic organisms when the number of amines is constant*". However, you consider that "*the difference in C atoms* [between the target and source substances] *does not seem to be relevant for the endpoints in question*";
- the target and souce substance share similaritires in metabolites as three metabolites of the target substance were identified to be identical to those of the source substance using the CATABOL simulator of microbial metabolism and as these metabolites mostly belong to the classes aldehydes (mono) and aliphatic amines . You also state that "*The microbial metabolism estimated 11 metabolites for the target substance and 10 metabolites for the source substance*";
- you consider that the target and sources substances show similar fate and ecotoxicological properties based on experimental data on the target and source substance, where available, or EPI Suite v4.11 and other (Q)SAR models predictions.

ECHA understand that you predict the properties of the Substance using a read-across hypothesis which assumes that different compounds have the same type of effects. The properties of your Substance are predicted to be quantitatively equal to those of the source substance.

ECHA notes the following shortcomings with regards to predictions of long-term toxicity on aquatic invertebrates:

A. *Read-across hypothesis*

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

A read-across hypothesis needs to be provided, establishing why a prediction for a toxicological or ecotoxicological property is reliable. This hypothesis should be based on recognition of the structural similarities and differences between the substances (ECHA Guidance R.6). It should explain why the differences in the chemical structures should not influence the toxicological/ ecotoxicological properties or should do so in a regular pattern.

Your read-across hypothesis is that the structural similarity between the source substance(s) and your Substance is a sufficient basis for predicting the properties of your Substance.

Similarity in chemical structure and similarity of some of the physicochemical and environmental fate properties does not necessarily lead to predictable or similar ecotoxicological properties. You have not provided a well-founded hypothesis to establish a reliable prediction for a ecotoxicological property, based on recognition of the structural similarities and differences between the source substance(s) and your Substance. In particular you have provided no supporting information to demonstrate that the difference in the number of carbons of the alkyl chains substituted on the amine group will not impact the prediction. As stated in your read-across justification it may be expected that "*the longer (or greater the number of carbons) the chain the more toxic to aquatic organisms* [the substance is expected to be] *when the number of amines is constant*".

B. Under Section 4.5.2. of the Read-Across Assessment Framework (RAAF), the source study used as the basis for the prediction must correspond to the study giving rise to the highest concern for the property under consideration.

In Table 8 of your read-across justification document, you list various studies on short-term toxicity on aquatic invertebrates for the source substance diethylamine. You intend to predict the properties of the Substance using the study by [redacted] (2000a) which reports a 48h-EC50 of 48 mg/L. You have not provided any justification as to why the study by Arkema (1994), which reports a 48h-EC50 of 4.6 mg/L was not used for the prediction.

Therefore, independent of the issues impacting the validity of the proposed read-across adaptation described above, you have not demonstrated that the selected information on the source substance will not bias the prediction.

Conclusions on the read-across approach

As explained above, you have not established that relevant properties of the Substance can be predicted from data on the analogue substance. Your adaptation does not comply with the general rules of adaptation as set out in Annex XI, Section 1.5. and your grouping and read-across approach is rejected. Therefore the information in your dossier on long-term toxicity on aquatic invertebrates cannot be used to adapt the information requirement for short-term toxicity on aquatic invertebrates under Annex VII, Section 9.1.1., Column 2, second indent in conjunction with Annex XI, Section 1.5.

On this basis, the information requirement is not fulfilled.

Study design

The Substance is difficult to test due to its adsorption potential (as it is ionisable) and potential for volatilisation. OECD TG 202 specifies that, for difficult to test substances, you must consider the approach described in OECD GD 23 or other approaches, if more appropriate for your substance. In all cases, the approach selected must be justified and documented. Due to the properties of Substance, it may be difficult to achieve and maintain the desired exposure concentrations. Therefore, you must monitor the test concentration(s) of the Substance throughout the exposure duration and report the results. If it is not possible to demonstrate the stability of exposure concentrations (i.e. measured concentration(s) not

within 80-120% of the nominal concentration(s)), you must express the effect concentration based on measured values as described in OECD TG 202. In case a dose-response relationship cannot be established (no observed effects), you must demonstrate that the approach used to prepare test solutions was adequate to maximise the concentration of the Substance in the test solution.

3. Growth inhibition study aquatic plants

Growth inhibition study aquatic plants is an information requirement under Annex VII to REACH (Section 9.1.2.).

You have provided the following information:

i. a key study according to DIN 38412, part 9 on the Substance ([redacted], 1988);

Additonally, in your comments on the draft decision, you proposed to adapt this information requirement under Annex XI, Section 1.5. ('Grouping of substances and read-across approaches'). In support of your adaptation you provided the following information:

ii. a reference to an OECD TG 201 study on the analogue substance diethylamine (EC No. 203-716-3) ([redacted], 2000c).

We have assessed this information and identified the following issues:

A. Evaluation of the information on the Substance available in your dossier

1. To comply with this information requirement, the test material in a study must be representative for the Substance (Article 10 and Recital 19 of REACH; ECHA Guidance R.4.1).

   For study i. above, you have identified the test material as "*N-propylpropan-1-amine / 142-84-7 / 205-565-9*" (*i.e.* the Substance) without further information, including composition, impurity profile and presence of impurities.

   In the absence of composition information on the test material, the identity of the test material and its impurities cannot be assessed and you have not demonstrated that the test material is representative for the Substance. Therefore, the information provided is rejected.

2. To fulfil the information requirement, a study must comply with OECD TG 201 and the requirements of OECD GD 23 (ENV/JM/MONO(2000)6/REV1) if the substance is difficult to test (Article 13(3) of REACH). Therefore, the following specifications must be met:

   Characterisation of exposure
   - a reliable analytical method for the quantification of the test material in the test solutions with reported specificity, recovery efficiency, precision, limits of determination (i.e. detection and quantification) and working range must be available;
   - the test media prepared specifically for analysis of exposure concentrations during the test is treated identically to those used for testing (*i.e.* inoculated with algae and incubated under identical conditions);
   - the concentrations of the test material are measured at least at the beginning and end of the test:
     1) at the highest, and

2) at the lowest test concentration, and
3) at a concentration around the expected EC_{50}.

For volatile, unstable or strongly adsorbing test substances, additional samplings for analysis at 24 hour intervals is required.

- if the concentration of the test material has not been maintained within 20 % of the nominal or measured initial concentration throughout the test, results must be based on the geometric mean of measured concentrations during exposure or on a model describing the decline of the concentration of the test material.

Other considerations

- Algal biomass is determined based on dry weight per volume, or alternatively as cell counts or biovolume using microscopy or an electric particle counter. If an alternative method is used (*e.g.* flow cytometry, *in vitro* or *in vivo* fluorescence, or optical density), a satisfactory correlation with biomass must be demonstrated over the range of biomass occurring in the test.

Your registration provides a key study by [redacted], 1988 (studies i. above) showing the following:

- no analytical monitoring of exposure concentrations was included. You specify that an evaluation of losses via evaporation was conducted by monitoring the TOC content of a stock solution at 100 mg/L nominal over 48 hours. Measured values were stable and the mean measured value was determined to be 79.0 mg/L and 79.3 mg/L, without or with shaking, respectively. You consider that losses will not impact exposure concentrations over the duration of the test.
- biomass was measured using *in vivo* fluorescence. No justification is provided that *in vivo* fluorescence was adequate for the determination of biomass (*e.g.* evidence of correlation between the measured parameter and dry weight for both control and treated groups).

Based on the above,

- there are critical methodological deficiencies resulting in the rejection of the results of these studies. More specifically, you have not demonstrated that exposure was satisfactorily maintained during the experiment as:
  - it is unclear if this estimate was obtained under conditions that are consistent with the test conditions;
  - a non-specific analytical method (i.e. TOC measurement) was used;
  - this estimate was obtained at 100 mg/L nominal and do not inform on potential losses of the test material at lower concentrations;
  - you have not assessed losses that could originate from adsorption of the test material under the test conditions. The test material is ionisable and therefore potentially highly adsorptive.

  Furthermore, we note that measured values differed by over 20% of nominal concentration and that this additional experiment indicate significant losses at some stage of the process. Therefore, this information does not provide reliable evidence that exposure was satisfactorily maintained during the test.
- the reporting of the studies is not sufficient to conduct an independent assessment of their reliability. More specifically as you have not provided any supporting information to demonstrate that *in vivo* fluorescence provides an adequate determination of algal biomass, it is not possible to verify that the study is reliable. The physiological status of algal cells is known to impact the efficiency of the non-photochemical quenching (NPQ) of fluorescence and differences in physiological status between treatments may bias the relationship between re-emitted fluorescence and biomass. You have not provided such supporting information.

Therefore, this study does not meet the specifications of OECD TG 201 in conjunction with OECD GD 23.

In your comments on the draft decision, you explain that the publication by [redacted], 1988 (study i.) does not contain the information listed above. Therefore, you will no longer use this information as key study to cover the information requirement for the Substance.

B. *Evaluation of read-across adaptation proposed in your comments on the draft decision*

For the same reasons already explained under issue B of Appendix B.2, you have not established that relevant properties of the Substance can be predicted from data on the analogue substance. Your adaptation does not comply with the general rules of adaptation as set out in Annex XI, Section 1.5. and your grouping and read-across approach is rejected.

On this basis, the information requirement is not fulfilled.

Study design

OECD TG 201 specifies that for difficult to test substances OECD GD 23 must be followed. As already explained above, the Substance is difficult to test. Therefore, you must fulfil the requirements described in 'Study design' under Appendix A.2.

4. Ready biodegradability

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

You have provided the following information:

i. an OECD TG 301B key study on the Substance ([redacted], 2005).

We have assessed this information and identified the following issue:

To fulfil the information requirement, a study must comply with the OECD TG 301 or 310 (Article 13(3) of REACH). Therefore, for a study according to OECD TG 301B, the following requirements must be met:

Validity criteria

- The inorganic carbon content (IC) of the test material suspension in the mineral medium at the beginning of the test is < 5% of the total carbon (TC);
- The total CO_2 evolution in the inoculum blank at the end of the test does not normally exceed 40 mg CO_2/L;

Applicability domain

- The test material falls into the applicability domain of the selected test method. In this regard, OECD TG 301 specifies that the OECD 301 B is not applicable to volatile substances;

Technical specifications impacting the sensitivity/reliability of the test

- The concentration of the inoculum is set to reach a bacterial cell density of 10^7 to 10^8 cells/L in the test vessel. The suspended solid concentration is ≤ 30 mg/L;

Reporting of the methodology and results

- The results of measurements at each sampling point in each replicate is reported in a tabular form;
- The inorganic carbon content (IC) and total carbon content (TC) of the test material suspension in the mineral medium at the beginning of the test is reported.

Your registration dossier provides a study showing the following:

- the OECD TG 301B was used. In Section 4.6 of your technical dossier you report vapour presure estimates for the Substance ranging from 24 hPa at 20°C to 26.8 hPa at 25°C. You consider that the Substance will not significantly partition from the water to the atmosphere as the pH-corrected Henry's Law constant (based on a method described in Appendix R.7.1-2 of ECHA Guidance R.7a (version 1.0, 2008)) in the pH range of 4 to 9 is 5.24 E-07 to 5.19 E-02 Pa.m³/mol;
- you have provided only information on inoculum density in mg/L suspended solids but no information on inoculum density in cells/mL;
- you have not reported the results of measurements at each sampling point in each replicate (including controls) and the inorganic carbon content (IC) and total carbon content (TC) of the test material suspension in the mineral medium at the beginning of the test.

Based on the above,

- there are critical methodological deficiencies resulting in the rejection of the results of this study. More specifically, you have not demonstrated that the test material falls in the applicability domain of OECD TG 301B. We acknowledge that substances that dissociate in water have a lower tendency to partition to air. However, we note that the method you used to derive the pH-corrected Henry's Law constant (HLC) for the Substance was removed from ECHA Guidance R.7a in version 2.0 (2012) as it is no longer considered scientifically valid. Therefore, considering that the Henry's Law constant of the undissociated form is high (5.24 Pa m³/mol at 25°C) and that no reliable estimate is available for the value of the dissociated form, the Substance is regarded as volatile and therefore outside the applicability domain of this test method.

  In your comments on the draft decision, you acknowledge that the pH-corrected Henry's Law constant method was withdrawn in more recent versions of the guidance and that no HLC can be derived for the charged molecule in the environmentally relevant pH range. However, you consider that the HLC for the uncharged molecule is rather low and will be even lower for the charged molecule, reducing the potential of the loss of the substance during the test via loss from the water phase to the air. Therefore, you disagree that the Substance falls outside the applicability domain of the test method. You consider that the difference between the biodegradation percentage determined based on DOC removal and CO_2 production indicates that the loss by volatilisation is c.a. 10%. You further state that "*as the degradation was followed by the evolved CO2, the potential loss of the substance via volatilization did not impact the result of the study*".

  ECHA agrees that there is currently no valid estimate of the HLC of the Substance in your registration dossier. However, ECHA disagrees with your statement that, as the percentage degradation was determined based on CO_2 production, loss by volatilization did not impact the reported results. As you have not specified how CO_2 production was measured, ECHA cannot verify whether measured values may have been biased by the presence of the test material in the volatile trap. For the same reason, your estimate of losses of the test material via volatilisation is not considered reliable. Therefore, ECHA maintains that you have not demonstrated that the test material falls in the applicability domain of OECD TG 301B.

- the reporting of the study is not sufficient to conduct an independent assessment of its reliability. More specifically:
  - you have not reported information on inoculum density in cells/L.

    In your comments on the draft decision, you state that "*the inoculum for a study according to OECD TG 301B can be derived from a variety of sources* [and therefore the inoculum density] *cannot be described using the same parameter*". You consider that Table 2 of OECD TG 301 provides several alternative parameters to characterize the inoculum density. In the study by [redacted] (2005), sludge was used as an inoculum. As the sludge was introduced at a concentration of 30 mg/L, you consider that the inoculum density was adequate.

    ECHA disagrees with this statement. The limit values for the inoculum density in mg/L (e.g. for sludge or soil) or mL/L (e.g. for surface water or effluent) are set to ensure that the introduction of exogeneous organic matter in the test system is within an acceptable range. However, such parameter does not provide a direct estimate of bacterial biomass (as the density of bacteria in, for e.g., a sludge sample or a secondary effluent may vary by orders of magnitude). In the absence of supporting information to demonstrate that the sludge concentration used in this study allowed reaching an adequate bacterial density, you have not demonstrated that the inoculum density was consistent with the specifications of OECD TG 301B.

  - as you have not provided adequate reporting of the study results, it is not possible to verify if validity criteria consistent with the specifications of OECD TG 301B were met.

    In your comments on the draft decision, you state that the validity criteria were met in the study provided in your registration dossier. You also state that you have updated your registration dossier to include the results of measurements at each sampling point in each replicate in a tabular form and the inorganic carbon content (IC) and total carbon content (TC) of the test material suspension in the mineral medium at the beginning of the test. However, this information is not available in your comments on the draft decision.

    Please note that this decision does not take into account updates of the registration dossiers after the date on which you were notified of the draft decision according to Article 50(1) of REACH (see section 5.4. of ECHA's Practical Guide "How to act in Dossier Evaluation).

Therefore, this study does not meet the specifications of OECD TG 301B.

On this basis, the information requirement is not fulfilled.

Appendix B: Requirements to fulfil when conducting and reporting new tests for REACH purposes

A. Test methods, GLP requirements and reporting

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

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

3. Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries[5].

B. Test material

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

1. Selection of the Test material(s)

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

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

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

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers[6].

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

Appendix C: Procedure

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

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

The compliance check was initiated on 24 March 2020.

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

ECHA took into account your comments and did not amend the requests.

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

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

Appendix D: List of references - ECHA Guidance[7] and other supporting documents

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

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

Read-across assessment framework (RAAF, March 2017)[8]

RAAF - considerations on multiconstituent substances and UVCBs (RAAF UVCB, March 2017)[8]

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

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

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

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

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

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

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

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

Data sharing
Guidance on data-sharing (version 3.1, January 2017), referred to as ECHA Guidance on data sharing in this decision.

OECD Guidance documents[9]

[7] https://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment
[8] https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across
[9] http://www.oecd.org/chemicalsafety/testing/series-testing-assessment-publications-number.htm

Guidance Document on aqueous-phase aquatic toxicity testing of difficult test chemicals – No 23, referred to as OECD GD 23.

Guidance document on transformation/dissolution of metals and metal compounds in aqueous media – No 29, referred to as OECD GD 29.

Guidance Document on Standardised Test Guidelines for Evaluating Chemicals for Endocrine Disruption – No 150, referred to as OECD GD 150.

Guidance Document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test – No 151, referred to as OECD GD 151.

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

You must provide the information requested in this decision for all REACH Annexes applicable to you.

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

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