Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.1 Melting point, boiling point, relative density (IIA3.1)								
3.1.1 Melting point								
Melting pt. 1	DSC	Purity: 99.51 mol %	125.0 $\pm$ 0.2 °C	--	N	1	Doc. No. 112-001, A3.1.1/01	X1
Melting pt. 2	DSC EPA OPP 63-16	Purity: 98 %	125 °C	DSC experiments performed to investigate explosive properties of DBNPA showed an endothermic peak at 125 °C. This result confirms the melting point determined in a previous study (see above)	Y	1	Doc. No. 119-001, A3.1.1/02	X2
Melting pt. 3	EC method A.1	98.1 ± 0.5 %	124.5 °C	Melting point determined using the capillary method by heating three samples of the test substance	Y	1	Doc. No. 119-002, A3.1.1/03	X3

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.1.2 Boiling point								
Boiling point 1	DSC EPA OPP 63-16	Purity: 98 %	Decomposition > 201 °C	DSC experiments performed to investigate explosive properties of DBNPA showed no endothermic peak above the melting point of 125 °C, but an exothermic peak starting at 201 °C with a maximum at 253 °C. This event can be interpreted as a decomposition reaction.	Y	1	Doc. No. 119-001, A3.1.1/02	X4
Boiling point 2	EC method A.2	98.1 ± 0.5 %	--	Not determined due to decomposition of the test substance..	Y	1	Doc. No. 119-002, A3.1.1/03	X5
3.1.3 Bulk density/ relative density								
Bulk density 1	EPA OPP 63-7	Purity: 98 %	Bulk density: 1.356 g/cm^3 at 25 °C	--	Y	1	Doc. No. 119-001, A3.1.1/02	X6
Bulk density 2	EPA OPP 63-7	Purity: 95 %	Bulk density: untapped: 0.934 g/mL	--	Y	2	Doc. No. 181-003,	X7

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
			tapped: 1.370 g/mL				C_A3.1.3/01	
3.2 Vapour pressure (IIA3.2)								
Vapour pressure 1	Knudsen-effusion weight loss method	Purity 98 %	8.91 x 10^{-6} mmHg = 1.19 x 10^{-3} Pa at 19.2 °C 1.96 x 10^{-4} mmHg = 2.61 x 10^{-2} Pa at 40.2 °C	Relationship between vapour pressure and temperature was investigated	N	1	Doc. No. 115-001, A3.2/01	X8
Vapour pressure 2	Calculated: Modified grain method	Not relevant: calculation	1.55 x 10-5 mmHg = 2.1 x 10^{-3} Pa at 25 °C	Calculated value confirms experimental results	N	2	Doc. No. 115-004, A3.2/02	X9
3.2.1 Henry´s Law Constant (Pt. I-A3.2)	Calculated at 20 °C	Not relevant: calculation	pH 5 = 1.99 x 10^{-5} Pa m^3 mol^{-1} pH 7 = 2.04 x 10^{-5} Pa m^3 mol^{-1} pH 9 = 1.45 x 10^{-5} Pa m^3 mol^{-1}	H = Vapour pressure x molecular mass / aqueous solubility	N	2	--	X10
3.3 Appearance (IIA3.3)								
3.3.1 Physical state								
Physical state 1	EPA OPP 63-3	Purity: 98 %	solid crystalline	--	Y	1	Doc. No. 119-001, A3.1.1/02	X11

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
Physical state 2	Methods for the determination of physico-chemical properties, Official Journal of the European Communities L383A, Vol. 35, 29 December 1992	98.1 ± 0.5 %	crystalline solid at room temperature	--	Y	1	Doc. No. 119-002, A3.1.1/03	X12
3.3.2 Colour								
Colour 1	EPA OPP 63-3	Purity: 98 %	off-white	--	Y	1	Doc. No. 119-001, A3.1.1/02	X13
Colour 2	Methods for the determination of physico-chemical properties, Official Journal of the European Communities L383A, Vol. 35, 29 December 1992	98.1 ± 0.5 %	off-white	--	Y	1	Doc. No. 119-002, A3.1.1/03	X14
3.3.3 Odour								

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
Odour 1	--	Purity: > 97 %	Mild pungent	--	N	1	SDS, Doc. No. 953-002; Document I, Appendix 7/01	X15
Odour 2	--	98.1 ± 0.5 %	--	Not tested due to potential inhalation hazard.	Y	1	Doc. No. 119-002, A3.1.1/03	X16
3.4 Absorption spectra (IIA3.4)								
UV/VIS	OECD Guideline 101	Purity: > 98 %	The UV spectrum confirms the molecular structure.	UV spectra were recorded in aqueous solutions at pH 2, 7 and 10.	N	1	Doc. No. 117-001, C_A3.4/01	X17
	--	Purity: 98 %	The UV spectrum confirms the molecular structure.		Y	1	Doc. No. 146-002, C_A3.4/02	X18
IR	KBr pellet; 4000 – 400 cm^{-1}	Purity: 99.65 $\pm$ 0.02 %	The IR spectrum confirms the molecular structure.	--	N	1	Doc. No. 411-005, C_A3.4/03	X19

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
NMR	^{1}H at 300.279 MHz ^{13}C at 75.512 MHz both in DMSO-d_6	Purity: 99.65 $\pm$ 0.02 %	The ^{1}H- and ^{13}C-NMR spectra obtained confirm the molecular structure.	--	N	1	Doc. No. 411-005, C_A3.4/03	X20
	^{1}H	98.1 – 99.9 %	The ^{1}H-NMR spectrum confirms the molecular structure.		N	2	Doc. No. 411-006, C_A3.4/04	X21
MS	--	Not indicated	The mass spectrum confirms the molecular structure	--	N	2	Doc. No. 117-002, C_A3.4/05	X22

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.5 Solubility in water (IIA3.5)								
Water solubility 1	shake flask method	Purity: > 99.5 %	0.79 wt % at 0.1 °C 1.53 wt % at 18.3 °C 3.82 wt % at 46.6 °C 5.46 wt % at 54.5 °C	effect of pH not investigated	N	2	Doc. No. 114-005, A3.5/01	X23
Water solubility 2	EPA OPP 63-8	Purity 99.5 %	17.00 + 0.50 g/L at 25.7 °C	effect of pH and temperature not investigated	Y	2	Doc. No. 114-003, A3.5/02	X24
Water solubility 3	EC method A.6 EPA 540/9-82-018 OECD 105	Purity 99.23 %	Mean solubility [g/L]: 10.8 (pH 5, 10 °C) 14.4 (pH 5, 20 °C) 20.2 (pH 5, 30 °C) 11.5 (pH 7, 10 °C) 14.1 (pH 7, 20 °C) 18.6 (pH 7, 30 °C) 19.9 (pH 9, 20 °C)	The mean water solubility of the test item was determined in the range of 10.1 – 20.2 g/L for all pH and temperatures tested.	Y	1	Doc. No. 114-007, A3.5/03	X25
3.6 Dissociation constant (-)	EPA OPP 63-10	Purity: not indicated; however Biobrom C103 is technical DBNPA	spectrophotometric method: pKa = 8.3 $\pm$ 0.3 titrimetric method: pKa 8.24 $\pm$ 0.05	Only if additional data are required (see BPD, TNsG)	Y	2	Doc. No. 115-003, A3.6/01	X26

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.7 Solubility in organic solvents, including the effect of temperature on solubility (IIIA3.1)								
Solubility in organic solvents 1	not indicated	not indicated	Results given in wt % at room temperature: methanol: 53 % 2-propanol: 23 % dipropylene glycol: 38% acetonitrile: 49 % dipropylen glycol dimethyl ether: 50 %	30 solvents are addressed in the report. The results for 5 solvents are presented herein.	N	2	Doc. No. 154-001, A3.7/01	X27
Solubility in organic solvents 2	EPA OPP 63-8	Purity: 95%	results obtained at 23 – 25 °C 150 g / 100 g acetone 160 g / 100 g tetrahydrofuran 75 g / 100 g dimethylformamide 60 g / 100 g ethanol 1 g / 100 g chloroform or benzene	Only results are presented in the report. No details on experiments.	Y	2	Dow Doc. No. 181-003, C_A3.1.3/01	X28
Solubility	CIPAC MT 181	98.1 ± 0.5 %	> 250 g/L in PEG 200 and acetone at 15 ± 1 °C	--	Y	1	Doc. No. 119-002,	X29

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
in organic solvents 3			and 30 ± 1 °C				A3.1.1/03	
3.8 Stability in organic solvents used in b.p. and identity of relevant breakdown products (IIIA3.2)			Not required	A study is not needed as neither the active substance as manufactured, nor the biocidal product covered by this dossier include an organic solvent.				X30

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.9 Partition coefficient n-octanol/water (IIA3.6)								
log Pow 1	EPA OPP 63-11	Purity: 99.5 %	pH 5: log Pow = 0.80 (Kow = 6.24) pH 7: log Pow = 0.80 (Kow = 6.31) pH 9: log Pow = 0.82 (Kow = 6.61) all at 20 – 21 °C	Shake-flask mehod	Y	1	Doc. No. 114-004, A3.9/01	X31

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.10 Thermal stability, identity of relevant breakdown products (IIA3.7)	--	Purity: > 97 %	Gases are released during decomposition. Decomposition products may include and are not limited to: bromine, carbon dioxide, dibromoacetonitrile, hydrogen bromide, nitrogen oxides and traces of cyanogen bromide, ethyl bromide, methyl bromide	No tests as per TNsG on data requirements are available. During a meeting of the Applicants and the RMS, RMS advised "to forward what is available" and that a test could be run later if needed.			SDSs, Doc. Nos. 953-002; 953-003. Document I, Appendix 7/01	X32
			DSC experiments performed to investigate explosive properties of DBNPA showed an exothermic peak starting at 201 °C with a maximum at 253 °C. This event can be interpreted as a decomposition reaction.		N	2	Doc. No. 119-001, A3.1.1/02	
			DSC experiments performed up to 370°C showed an endothermic event at 125°C and an exothermic event at 245°C. No further events were measured up to 370°C.		N	1	Doc. No. 141-003 A3.10/01	

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.11 Flammability, including auto-flammability and identity of combustion products (IIA3.8)								
Flammability 1	Spatula test, ignition tube test and dust cloud flammability test	Purity: not stated	According to the group A/B classification test, DBNPA is group B non-flammable at temperatures below 110 °C.	--	Y	2	Doc. No. 142-001, A3.11/01	X33
Flammability 2	EC method A.10	98.1 ± 0.5 %	(i) The test substance did not propagate combustion. (ii) The test substance is not classified as highly flammable in terms of its burning characteristics.	--	Y	1	Doc. No. 119-002, A3.1.1/03	X34
Auto-flammability	EC method A.16	98.1 ± 0.5 %	The test substance did not ignite before melting.	--	Y	1	Doc. No. 119-002, A3.1.1/03	X35
3.12 Flash-point (IIA3.9)	--	--	As DBNPA is a solid at ambient conditions and up to 125 °C, this data requirement is not applicable for DBNPA.		--	--	--	X36

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.13 Surface tension (IIA3.10)	EC method A.5	98.1 ± 0.5 %	72.2 ± 0.6 mN · m^{-1} at 25.0 ± 0.5 °C	The Wilhelmy Plate method was used to measure the surface tension.	Y	1	Doc. No. 119-002, A3.1.1/03	X37
3.14 Viscosity (-)	--	--	According to the TNsG on data requirements, the viscosity must be provided for liquids. As DBNPA is a solid at ambient conditions and up to 125 °C, this data requirement is not applicable for DBNPA.		--	--	--	X38

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.15 Explosive properties (IIA3.11)	DSC EPA OPP 63-16	Purity: 98 %	Based on the results of the test, the test material is not impact sensitive.	Not applicable, there are no chemical groups associated with explosive properties present in the DBNPA molecule. Indeed, none of the groups listed as indicating explosive properties under Section 2.1.4.2 of the ECHA Guidance on the application of the CLP criteria (version 5.0, July 2017) are found in DBNPA, thus Section 2.1.4.2 point a. (page 91) of the CLP criteria is satisfied.	Y	1	Doc. No. 119-001, A3.1.1/02	X39
3.16 Oxidizing properties (IIA3.12)	estimation	--	According to the TNsG for guidance on data requirements and the EC Method A.17 *"In cases where an examination of structural formula establishes beyond reasonable doubt that the active ingredient is incapable of*		N	2	--	X40

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
			reacting exothermically with combustible material, it is acceptable to provide such information as justification for the non-determining of oxidising properties." According to the supplement to EC Method A17 "*Compounds which have no highly electronegative atom - oxygen, fluorine, chlorine, bromine - are not likely to possess oxidizing properties. Similarly, where these elements **are** present **but the atoms are only bonded to carbon and/or hydrogen**, then oxidizing properties are unlikely. A substance may have oxidizing properties when:* • *the electronegative atoms which are present constitute a high proportion of the molecule and are bound to elements in a high oxidation state;* • *the electronegative atoms are bonded to each other or to other electronegative elements such as iodine, nitrogen, sulphur or phosphorus.* *For organic substances only, the oxygen balance (OB) calculation may be useful as a criteria combined with an examination of the chemical structure as a means of predicting*				

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
			oxidizing properties." As can be seen from the chemical structure of DBNPA, given in Document IIIA, Section 2, DBNPA consist of carbon, hydrogen, nitrogen, oxygen and bromine. The bromines and the oxygen atom are only bonded to carbon. The oxygen balance is negative. Therefore, it is concluded that DBNPA does not react exothermically with combustible material.					
3.17 Reactivity towards container material (IIA3.13)	Experience		DBNPA is stored and delivered in HDPE containers without problems for several decades.					X41
	Experience		Keep container closed. Do not store in Aluminium. Avoid contact with amines, strong bases, strong oxidisers, strong reducing agents. Avoid contact with metals such as Aluminium.	Please refer to [REDACTED] Safety Data Sheet (SDS).	N/A	1	SDS, Doc. No. 953-002; Document I, Appendix 7/01	

Section A3	**Physical and Chemical Properties of Active Substance**							
Subsection (Annex Point)	**Method**	**Purity/ Specification**	**Results** Give also data on test pressure, temperature, pH and concentration range if necessary	**Remarks/ Justification**	**GLP (Y/N)**	**Reliability**	**Reference**	**Official use only**
3.18 Dust explosion hazard (IIA4.17.3.)	ISO 6184/1 1085	Purity: not specified	Explosion pressure: 5.6 bar at 2500 g/m^3 Max. rate of pressure rise: 340 bar/s at 2500 g/m^3 K_{st} value: 92 bar/m/s St class: St 1	The minimum Ignition Energy of DBNPA was found to be >500. Therefore, DBNPA is considered to be low on sensitivity to ignition.	N		Russell L (1995) Chilworth Report No. 04395	
3.19 Granulometry **(Correct reference: C_A3.14/01)**	CIPAC MT 187	--	No presence of inhalable/respirable particles have been detected	Particle size analysis by laser diffraction was used.	Y	1	Michnik I, (2023) Report No. GLP3016013 296R1/2023 Pathak S, (2023) Report No. 10971.10 C_A3.14/01	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.1 Melting point 1 (X1) [REDACTED], *method in line with EC A1*
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.1 Melting point 2 (X2) [REDACTED], method EPA OPP 63-16
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Method EPA PP 63-16 explodability testing showed endotherm at melting temperature, confirms previous result.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.1 Melting point 3 (X3) Capillary method, EC A1 on [REDACTED]
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.2 Boiling point 1 (X4) [REDACTED], Method EPA PP 63-16
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Method EPA PP 63-16 explodability testing showed exotherm starting at 201°C with a maximum at 253°C. This corresponds to decomposition
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.2 Boiling point 2 (X5) [REDACTED], visual assessment, method EC A2
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	No boiling point determined due to decomposition
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.3 Bulk/rel. density 1 (X6) Bulk density on [REDACTED] at 23°C, method EPA OPP 63-7
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Both tapped and untapped results should be reported, see Bulk/rel. density 2
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.1.3 Bulk/rel. density 2 (X7) Bulk density on [REDACTED]at 25°C
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Both tapped and untapped results are presented
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.2 Vapour pressure 1 (X8) Vapour pressure Knudsen effusion method EC A4 on [REDACTED] at 20°C and 40°C
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.2 Vapour pressure 2 (X9) Calculation method
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	Confirms experimental results
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.2.1 Henrys Law Constant (X10) Calculated from vapour pressure and water solubility
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.1 Physical state 1 (X11) Visual assessment on [REDACTED] at 25°C
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.1 Physical state 2 (X12) Visual assessment on [REDACTED] at room temperature
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.2 Colour 1 (X13) Visual assessment on [REDACTED] at 25°C
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.2 Colour 2 (X14) Visual assessment on [REDACTED] at room temperature
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.3 Odour 1 (X15)
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	Not a data requirement, [REDACTED]
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.3.3 Odour 2 (X16) Not tested due to inhalation hazard
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Lot number of test item not given
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 UV/Vis (X17) OECD 101 conducted on [REDACTED] at 3 pH values
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	pH2 spectra has maxima at 195 nm which give $\varepsilon = 3900$ L.mol^{-1}.cm^{-1} pH 10 and 7 spectra have no maxima
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 UV/Vis (X18) Conducted on [REDACTED]at one pH
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	Confirms molecular structure only conducted at one pH, acceptable as purity is 98%, therefore unlikely to give different result than the [REDACTED]. Full details of instrumentation not given.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 IR (X19) In KBr disks conducted on technical DBNPA (99.65%)
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Conducted on [REDACTED]
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 NMR (X20) ^{13}C and 1H spectra
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Conducted on [REDACTED]
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 NMR (X21) ^{1}H spectra
Conclusion	-
Reliability	3
Acceptability	Not Acceptable
Remarks	Full details are not given for the ^{1}H NMR, details of the test item are missing, instrument conditions not given. See X20 for acceptable data.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.4 MS (X22) No purity stated or method
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	Information is missing on the MS method and purity
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.5 Water solubility 1 (X23) Shake flask method on [REDACTED]
Conclusion	-
Reliability	3
Acceptability	Not Acceptable
Remarks	pH not investigated. As the test item has a pKa pH should be investigated. Please refer to Water solubility 3

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.5 Water solubility 2 (X24) Shake flask method on [REDACTED]
Conclusion	-
Reliability	3
Acceptability	Not Acceptable
Remarks	pH not investigated. As the test item has a pKa pH should be investigated. Please refer to Water solubility 3

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.5 Water solubility 3 (X25) Shake flask method on [REDACTED], OECD 105
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Effects of pH and temperature investigated. pKa of 8.3
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.6 Dissociation constant (X26) Purity not stated however conducted on [REDACTED] which is technical DBNPA, titrimetric and spectroscopic method
Conclusion	Acceptable
Reliability	2
Acceptability	Acceptable
Remarks	[REDACTED]. Testing at 23-25°C. Not conducted in triplicate as stated in OECD 112, conducted by titrimetric and spectroscopic methods with good agreement between results, no check made for the presence of emulsions.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.7 Solubility in organic solvents 1 (X27)
Conclusion	-
Reliability	3
Acceptability	Not Acceptable
Remarks	Various solvents used with no indication of purity and not given in g/L. No temperature given. See solubility in organic solvents 2 and 3
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.7 solubility in organic solvents 2 (X28)
Conclusion	-
Reliability	3
Acceptability	Not Acceptable
Remarks	No details on method
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	
	Evaluation by Rapporteur Member State

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.7 solubility in organic solvents 3 (X29) Conducted on technical DBNPA
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Conducted on PEG 200 and acetone, conducted on technical DBNPA of 98.1% purity. [REDACTED]. However, the purity of 98.1% can be considered acceptable, as a more pure form is unlikely to give different results.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.8 solubility in organic solvents used in b.p. and identity of relevant breakdown products (X30)
Conclusion	-
Reliability	-
Acceptability	Acceptable
Remarks	Not required
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.9 Partition coefficient n-octanol/water (X31) Conducted on [REDACTED] at 3 pH's
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Used different concentrations at each pH, did not vary the ratio of octanol:water.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	3 June 2013
Materials and methods	Section 3.10 Thermal stability, identity of relevant breakdown products (X32)
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	DSC analysis showed the melting and decomoposition temperatures. [REDACTED]
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.11 Flammability 1 (X33)
Conclusion	-
Reliability	3
Acceptability	Not acceptable
Remarks	Purity not stated and testing not inline with EC A10 see Flammablity 2
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.11 Flammability 2 (X34) Method EC A10 conducted on technical DBNPA
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	- Justification from applicant Two key studies on flammability and one key study on the autoflammability properties for DBNPA were submitted by the applicants in July 2007 in accordance with the data requirements for the BPD (98/8/EC), prior to Regulation (EU) 1272/2008 coming into force. In accordance with the Guidance on application of the CLP criteria v5 July 2017: For the classification of a substance or mixture as a flammable solid data on the following properties are needed: • • melting point; • • information on water reactivity; • • information on flash point for solids containing flammable liquids. For inorganic material, testing may be waived in cases where the substance is commonly known to be not flammable (i.e. stable salts or metal oxides) or where a flammability hazard can be excluded by any other scientific reasoning. The melting point of DBNPA is 125ºC, with decomposition from 201ºC. The substance hydrolyses in water and is highly soluble (ca. 10-20 g/L) in the pH range 5 to 9, at temperatures of 10 to 30ºC. The substance does not contain any flammable liquid being identified as a white crystalline solid. The two existing flammability studies performed to EC Method A10 Show that (i) The test substance did not propagate combustion. (ii) The test substance is not classified as highly flammable in terms of its burning characteristics. In the autoflammability study performed in accordance with EC Method A 16, the test substance did not ignite before melting. In the absence of any indication in the existing studies that the substance is flammable, an additional screening study performed in accordance with Part III, Sub-section 33.2.1.4.3.2 of the UN-MTC is scientifically unjustified.

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*

Remarks

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.11 Autoflammability (X35) Method EC A16 conducted on technical DBNPA
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	- Justification from applicant In accordance with the Guidance on application of the CLP criteria v5 July 2017: According to the additional classification considerations in CLP Annex I, 2.10.4, the classification procedure for pyrophoric solids need not be applied when experience in manufacture or handling shows that the substance or mixture does not ignite spontaneously on coming into contact with air at normal temperatures (i.e. the substance or mixture is known to be stable at room temperature for prolonged periods of time (days)). In the autoflammability study performed in accordance with EC Method A 16, the test substance did not ignite before melting. In addition, there have been no reported incidences of the substance exhibiting pyrophoric properties during manufacture, transport, use or during testing. In the absence of any indication that the substance is pyrophoric a UN Test N.2 as described in Part III, Sub-section 33 of the UN-MTC is scientifically unjustified.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.12 Flash point (X36) According to the TNsG on data requirements, the flash point must be provided for liquids. As DBNPA is a solid at ambient conditions and up to 125 °C, this data requirement is not applicable for DBNPA.
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	-
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.13 Surface tension (X37) Method EC A5 conducted on technical DBNPA at 25°C at 1g/L
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	Not surface active
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.14 Viscosity (X38) According to the TNsG on data requirements, the viscosity must be provided for liquids. As DBNPA is a solid at ambient conditions and up to 125 °C, this data requirement is not applicable for DBNPA.
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.15 Explosive properties (X39) DSC EPA OPP63-16 Conducted at 98% purity
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	
	COMMENTS FROM APPLICANT
Date	*April 2o22*
Results and discussion	*The waiver justification was updated as requested by the eCA:* *Not applicable, there are no chemical groups associated with explosive properties present in the DBNPA molecule. Indeed, none of the groups listed as indicating explosive properties under Section 2.1.4.2 of the ECHA Guidance on the application of the CLP criteria (version 5.0, July 2017) are found in DBNPA, thus Section 2.1.4.2 point a. (page 91) of the CLP criteria is satisfied.*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	30 May 2013
Materials and methods	Section 3.16 Oxidising properties (X40) According to the TNsG for guidance on data requirements and the EC Method A.17 "In cases where an examination of structural formula establishes beyond reasonable doubt that the active ingredient is incapable of reacting exothermically with combustible material, it is acceptable to provide such information as justification for the non-determining of oxidising properties." According to the supplement to EC Method A17 "Compounds which have no highly electronegative atom - oxygen, fluorine, chlorine, bromine - are not likely to possess oxidizing properties. Similarly, where these elements are present but the atoms are only bonded to carbon and/or hydrogen, then oxidizing properties are unlikely. A substance may have oxidizing properties when: • the electronegative atoms which are present constitute a high proportion of the molecule and are bound to elements in a high oxidation state; • the electronegative atoms are bonded to each other or to other electronegative elements such as iodine, nitrogen, sulphur or phosphorus. For organic substances only, the oxygen balance (OB) calculation may be useful as a criteria combined with an examination of the chemical structure as a means of predicting oxidizing properties." As can be seen from the chemical structure of DBNPA, given in Document IIIA, Section 2, DBNPA consist of carbon, hydrogen, nitrogen, oxygen and bromine. The bromines and the oxygen atom are only bonded to carbon. The oxygen balance is negative. Therefore, it is concluded that DBNPA does not react exothermically with combustible material..
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	3 June 2013
Materials and methods	Section 3.17 Reactivity towards container material (X41)
Conclusion	-
Reliability	2
Acceptability	Acceptable
Remarks	The applicant states DBNPA has been stored and delivered in HDPE containers without problems for several decades. MSDS states avoid contact with amines, strong bases, strong oxidisers, strong reducing agents. Avoid contact with metals such as Aluminium. Recommended that at product authorisation the applicant provides further information to support this claim.
	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	26 July 2023
Materials and methods	Section 3.19 (3.14 correct reference) Granulometry, CIPAC MT 187
Conclusion	-
Reliability	1
Acceptability	Acceptable
Remarks	No presence of inhalable/respirable particles have been detected

	COMMENTS FROM...
Date	*Give date of comments submitted*
Results and discussion	*Discuss additional relevant discrepancies referring to the (sub) heading numbers and to applicant's summary and conclusion.* *Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Reliability	*Discuss if deviating from view of rapporteur member state*
Acceptability	*Discuss if deviating from view of rapporteur member state*
Remarks	

Section A3 **Annex Point IIA, III.3**	**Self-reactive substances and mixtures**	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	Not applicable, there are no chemical groups present in DBNPA associated with explosive or self-reactive properties. Indeed, none of the groups given in Table A6.1 in Appendix 6 of the UN RTDG, Manual of Tests and Criteria (Rev. 7, 2019) are found in DBNPA, thus Annex I: 2.8.4.2 (page 157) of the CLP criteria is satisfied.	
Undertaking of intended data submission [ ]		
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	*31. October 2022*	
Evaluation of applicant's justification	*Based on information given in Annex 6 of the UN RTDG, Manual of Tests and Criteria (Rev. 7, 2019) and on satisfaction of Annex 2.8.4.2 of the CLP Guidance on the Application of the CLP Criteria (v.5. June 2017), submission of data on DNPA is not necessary.*	
Conclusion	*Justification by applicant is acceptable.*	
Remarks		
	COMMENTS FROM OTHER MEMBER STATE *(specify)*	
Date	*Give date of comments submitted*	
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*	
Conclusion	*Discuss if deviating from view of rapporteur member state*	

Section A3 **Annex Point IIA, III.3**	**Self-heating substances and mixtures**	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	According to CLP guidance p 113 : " Substances or mixtures with a low melting point (< 160 °C) should not be considered for classification in this class since the melting process is endothermic and the substance-air surface is drastically reduced. However, this criterion is only applicable if the substance or mixture is completely molten up to this temperature." The melting point of DBNPA is 123-125 °C thus it should not be considered for classification in this class.	
Undertaking of intended data submission [ ]		
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	*31. October 2022*	
Evaluation of applicant's justification	*Based on information given in the CLP Guidance on the Application of the CLP Criteria v.5 2017 and on the melting point of DBNPA, submission of data is not necessary.*	
Conclusion	*Justification by applicant is acceptable.*	
Remarks		
	COMMENTS FROM OTHER MEMBER STATE *(specify)*	
Date	*Give date of comments submitted*	
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*	
Conclusion	*Discuss if deviating from view of rapporteur member state*	

Section A3 **Annex Point IIA, III.3**	**Substances and mixtures which in contact with water emit flammable gases and organic peroxides**	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	Not applicable, DBNPA does not contain metals or metalloids and is known be moderately soluble in water forming a stable mixture when diluted in water . Thus Annex I: 2.12.4.1 a) and c) (page 191) of the ECHA Guidance on the application of the CLP criteria (version 5.0, July 2017) is satisfied. Furthermore, Annex I: 2.12.4.1 b) (page 191) is satisfied due to water being the primary solvent used in DBNPA production.	
Undertaking of intended data submission [ ]		
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	*31. October 2022*	
Evaluation of applicant's justification	*Based on information given in the CLP Guidance on the Application of the CLP Criteria (v.5 June 2017) and on the chemical composition, DBNPA is assessed to not emit flammable gases and organic peroxides when in contact with water. Submission of data is not necessary.*	
Conclusion	*Justification by applicant is acceptable*	
Remarks		
	COMMENTS FROM OTHER MEMBER STATE *(specify)*	
Date	*Give date of comments submitted*	
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*	
Conclusion	*Discuss if deviating from view of rapporteur member state*	