Document III-A

IPBC

CAS No. 55406-53-6
from IPBC Task Force
For use as in-can preservative (Product Type 6)

Gelöscht: 1

All studies evaluated in Doc III-A with the PT 8 dossier and most of the justifications for non-submission presented in the PT 8 dossier are applicable for the present dossier for PT 6. In cases where new studies or other information's have been submitted these will be presented here.

Section A1 Applicant

Annex Point IIA1

1.1	**Applicant**	**Name:** European Union IPBC Task Force (**Arch Chemicals, Dow Benelux B.V., ISP Switzerland GmbH, Lanxess Deutschland GmbH, Troy Corp.**), c/o SCC GmbH **Address:** [redacted] **Telephone:** [redacted] **Fax number** [redacted] E-mail address: [redacted]
1.2	**Manufacturer of Active Substance** (if different)	Confidential information: Please refer to the "Confidential Data File"
1.3	**Manufacturer of Product(s) (if different)**	Not applicable: The Product Dossier is based on a model formulation.
	1) Product 1	
	2) Product n	

Gelöscht: [redacted]

Gelöscht: 1

Section A2 Identity

[redacted]

Please refer to the "Confidential Data File" for information on Identity

[redacted]

Gelöscht: [redacted]

Section A3 Physical and Chemical Properties of Active Subst

All data was already submitted in the PT 8 dossier (see Doc IIIA reference list). [redacted]

Gelöscht: 1

Section A4.1 Analytical Methods for Detection and Identification

Annex Point IIA4.1/4.2 & IIIA-IV.1

[redacted]

Gelöscht: [redacted]

A summary of the analytical method for the determination of the active substance in IPBC technical is provided in Doc IIA, chapter 1.4.1.

Formatiert: Nicht Großbuchstaben

Gelöscht: 1

Section A4.2d/01 Analytical Methods for Detection and Identification
Annex Point IIAIV.4.2 (d) of IPBC and PBC in animal and human body fluids and tissues

			Official use only
		1 REFERENCE	
1.1	**Reference**	Düsterloh, K., (2008). Development and Validation of a Residue Analytical Method for the Determination of IPBC and its metabolite PBC in Body Fluids and Tissue, Itingen, Switzerland: RCC, Study No.: B49443; Doc.-No. 433-002	
1.2	**Data protection**	Yes	
1.2.1	Data owner	[redacted]	
1.2.2	Companies with Letter of Access	[redacted]	
1.2.3	Criteria for data protection	[redacted]	
		2 GUIDELINES AND QUALITY ASSURANCE	
2.1	**Guideline study**	Yes; European Commission, Guidance Document on Residue Analytical Methods, SANCO/825/00 rev. 7, Jun. 20, 2004	
2.2	**GLP**	Yes	
2.3	**Deviations**	No	
		3 MATERIALS AND METHODS	
3.1	**Preliminary treatment**		
3.1.1	Enrichment	No enrichment	
3.1.2	Cleanup	IPBC and PBC were extracted from blood and urine with acetonitrile:acetic acid, centrifuged and diluted if appropriate. To extract IPBC and its metabolite from meat acetonitrile:HCl was used as extracting GmbHent.	
3.2	**Detection**		
3.2.1	Separation method	Reversed phase chromatography on C 18 phase (in confirmatory method a Luna Phenyl-hexyl column used)	
3.2.2	Detector	MS/MS detection with positive electrospray ionisation.	
3.2.3	Standard(s)	IPBC and PBC standards were prepared in Methanol.	
3.2.4	Interfering substance(s)	none	
3.3	**Linearity**		
3.3.1	Calibration range	Please refer to table 1	
3.3.2	Number of measurements	7 calibration standard solutions for each substance	

Section A4.2d/01	Analytical Methods for Detection and Identification
Annex Point IIAIV.4.2 (d)	of IPBC and PBC in animal and human body fluids and tissues

3.3.3	Linearity	correlation coefficient r^2
		Please refer to table 1
3.4	**Specifity: interfering substances**	There were no interfering substances seen in the blank chromatograms. The specificity was shown by confirmatory methods.
3.5	**Recovery rates at different levels**	Please refer to table 3
3.5.1	Relative standard deviation	Please refer to table 3
3.6	**Limit of determination**	Limit of Detection (LOD)
		Please refer to table 4
		Limit of Quantification (LOQ)
		Please refer to table 4
3.7	**Precision**	
3.7.1	Repeatability	Please refer to table 3
3.7.2	Independent laboratory validation	Not necessary for a analytical method in body fluids and tissue

Section A4.2d/01	Analytical Methods for Detection and Identification
Annex Point IIAIV.4.2 (d)	of IPBC and PBC in animal and human body fluids and tissues

4 APPLICANT'S SUMMARY AND CONCLUSION

4.1 Materials and methods

IPBC and PBC were extracted from blood and urine with acetonitrile:acetic acid, centrifuged and diluted if appropriate. To extract IPBC and its metabolite from meat acetonitrile:HCl was used as extracting agent.

Analysis was done by HPLC using reversed-phase liquid chromatography and a water / methanol gradient on a C18-column.

Detection was made with a MS/MS system using positive electrospray ionisation.

4.2 Conclusion

Validation data in urine showed recoveries in the range of 67 – 79 % for IPBC and 60 – 87 % for PBC at the concentration levels of 0.05 and 0.5 mg/L.

In blood and muscle IPBC degraded rapidly and it was not possible to determine IPBC residues above 70%. A degradation test was performed and it could be shown that spiked IPBC amounts could be determined as PBC and calculated as IPBC equivalents with mean recoveries of 112 % in blood and 116% in muscle.

These results are in agreement with the toxicological evaluation, where a very rapid degradation of IPBC to PBC was observed (please refer to Section A6.2/01; Annex Point IIA, VI.6.2; Toxicokinetic and metabolism in mammals, Rat, gavage).

For PBC recoveries in the range of 76 – 117 % were obtained in meat and recoveries of 81 – 114 % in blood. This shows that PBC was stable over the period of the experiment.

4.2.1 Reliability

4.2.2 Deficiencies

No

	Evaluation by Competent Authorities Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Materials and methods	[redacted]
Conclusion	[redacted]
Reliability	[redacted]
Acceptability	[redacted]
Remarks	[redacted]

Gelöscht: 1

Table 1 Calibration range

Matrix	Test substance	lower level	upper level
Blood	IPBC	0.5 ng/mL	12.5 ng/mL
	PBC	0.5 ng/mL	12.5 ng/mL
Urine	IPBC	0.5 ng/mL	12.5 ng/mL
	PBC	0.5 ng/mL	12.5 ng/mL
Meat	IPBC	0.5 ng/mL	12.5 ng/mL
	PBC	0.5 ng/mL	12.5 ng/mL

Table 2 Correlation coefficients for linear calibration

Matrix	Test substance	correlation coefficient R^2
Blood	IPBC	0.9981
	PBC	0.9994
Urine	IPBC	0.9981
	PBC	0.9994
Meat	IPBC	0.9981
	PBC	0.9994

Table 3a Validation data for primary methods

Matrix	Test substance	Fortification level	Recovery rate (%)		RSD	N
			mean	range	(%)	
Blood	PBC	0.05 mg/L	93	81 – 109	13	4
	PBC	0.5 mg/L	103	96 – 114	6	5
Overall	PBC		99	81-114	10	10
Urine	IPBC	0.05 mg/L	76	72 – 79	3	5
	PBC	0.05 mg/L	63	60 – 67	4	5
	IPBC	0.5 mg/L	70	67 – 76	5	5
	PBC	0.5 mg/L	77	73 – 87	7	5
Overall	IPBC		73	67-79	5	10
Overall	PBC		70	60-87	12	10
Meat	PBC	0.1 mg/kg	99	84 – 117	11	5
	PBC	1.0 mg/kg	86	76 – 99	10	5
Overall	PBC		92	76-117	13	10

Table 3b Validation data for confirmatory methods

Matrix	Test substance	Fortification level	Recovery rate (%)		RSD	N
			mean	range	(%)	
Blood	PBC	0.05 mg/L	93	73 – 104	15	3
	PBC	0.5 mg/L	106	106, 106	0	2
Overall	PBC		98	73-106	13	5
Urine	IPBC	0.05 mg/L	100	95-105	4	3
	PBC	0.05 mg/L	83	74-88	8	3
	IPBC	0.5 mg/L	101	99; 103	2	2
	PBC	0.5 mg/L	80	82, 78	3	2
Overall	IPBC		100	95-105	3	5
Overall	PBC		82	74-88	7	5
Meat	PBC	0.1 mg/kg	87	80 – 96	8	3
	PBC	1.0 mg/kg	91	95, 88	4	2
Overall	PBC		89	80-96	7	5

Table 4 Limit of Detection (LOD) and Limit of Quantification (LOQ)

Matrix	Test substance	LOD	LOQ
Blood	IPBC	0.026 mg/mL	0.05 mg/L
	PBC	0.026 mg/mL	0.05 mg/L
Urine	IPBC	0.026 mg/mL	0.05 mg/L
	PBC	0.026 mg/mL	0.05 mg/L
Meat	IPBC	0.050 mg/kg	0.1 mg/kg
	PBC	0.050 mg/kg	0.1 mg/kg

Gelöscht: 1

Section A4.3 Annex Point IIA,IV.4.2 (e)	Analytical Methods for Detection and Identification of IPBC in food and feeding stuffs and other products where relevant
	JUSTIFICATION FOR NON-SUBMISSION OF DATA — Official use only
Other existing data [ ]	Technically not feasible [ ] Scientifically unjustified [ ]
Limited exposure [ ]	Other justification [X]
Detailed justification:	Products (e.g. paints or washing fluids) containing IPBC as an in-can preservative may be applied on materials which may come in contact with food or feedstuff. [redacted]
	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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*
Remarks	

Gelöscht: [redacted]
Gelöscht: [redacted]

Gelöscht: 1

Section A5 Effectiveness against target organisms and intended uses: Active substance IPBC

Subsection (Annex Point)			Official use only
5.1	**Function (IIA5.1)**	Fungicide	
5.2	**Organism(s) to be controlled and products, organisms or objects to be protected (IIA5.2)**	-	
5.2.1	**Organism(s) to be controlled (IIA5.2)**	Fungi including yeasts. [redacted]	X
5.2.2	**Products, organisms or objects to be protected (IIA5.2)**	PT6: IPBC is a fungicide for in-can preservation. It is used in a variety of products, e.g. in washing and cleaning fluids, detergents, paints etc.	
5.3	**Effects on target organisms, and likely concentration at which the active substance will be used (IIA5.3)**	-	
5.3.1	**Effects on target organisms (IIA5.3)**	IPBC is toxic to fungi. Data on the efficacy of IPBC against [redacted] are provided in the confidential part [redacted] The lowest tested concentration covers the below cited likely lowest concentration at which IPBC is used in the end-product of 0.01%.	X
5.3.2	**Likely concentrations at which the A.S. will be used (IIA5.3)**	IPBC is added as an in-can preservative to a variety of products (e.g. paints and detergents). Based on the categorisation used in the ESD for PT6 the following relevant applications (sub-groups) were chosen for the environmental and human risk assessments to cover the worst case situation: 6.1 Washing and cleaning fluids Concentrate: 15% - 30% IPBC End-product: 0.1% IPBC 6.1 Detergents	

Gelöscht: 2

Gelöscht: 1

Section A5 Effectiveness against target organisms and intended uses: Active substance IPBC

Concentrate: 15% - 30% IPBC

End-product: 0.1% IPBC

6.2 Paints and coatings — Gelöscht: 3

Concentrate: 30% IPBC

End-product: 0.01% - 0.1% IPBC

6.3 Fluids used in paper-, textile and leather production X — Gelöscht: 4

Concentrate: 30% IPBC

End-product: 0.1% IPBC

6.6 Glues and Adhesives — Gelöscht: 7

Concentrate: 10% - 30% IPBC

End-product: 1% IPBC

This list is not claimed to be all-inclusive. Additional uses may exist and/or concentrations may be used which are not covered by the exposure and risk assessments provided in this dossier. In this case such uses or differing concentrations would need to be evaluated on the national level after Annex I inclusion.

The in-can preservation product is only industrial/professional used. The end-product can be used by industrials, professionals and amateurs.

5.4	**Mode of action (including time delay) (IIA5.4)**	-	
5.4.1	**Mode of action**	IPBC has a Carbamate structure. The target sites of Carbamates in fungi are cell membrane permeability and fatty acids (according to the information provided by FRAC (Fungicide Resistance Action Committee) on its website *http://www.frac.info/frac/publication/anhang/FRAC_Code_List2_2006_web.pdf*	X
5.4.2	**Time delay**	Not a relevant point for an in-can preservative	
5.5	**Field of use envisaged (IIA5.5)**	Include code(s) and term(s)	X
	MG02: Preservatives	IPBC is used in products of the following Product Types: PT06: In-can preservatives PT07: Film preservatives PT08: Wood preservatives	

Section A5		Effectiveness against target organisms and intended uses: Active substance IPBC	
		PT09: Fibre, leather, rubber and polymerised materials preservatives PT10: Masonry preservatives PT11: Preservatives for liquid-cooling and processing systems PT13: Metalworking preservatives In the present dossier, only the use of IPBC for in-can preservation is addressed.	
	Further specification		X
5.6	**User (IIA5.6)**		
	Industrial	See above: Doc. IIIA, Section A5.3.2	
	Professional	See above: Doc. IIIA, Section A5.3.2	
	General public	See above: Doc. IIIA, Section A5.3.2	
5.7	**Information on the occurrence or possible occurrence of the development of resistance and appropriate management strategies (IIA5.7)**		
5.7.1	**Development of resistance**	IPBC has a Carbamate structure. The target sites of Carbamates in fungi are cell membrane permeability and fatty acids (according to the information provided by FRAC (Fungicide Resistance Action Committee) on its website (see above: Section 5.4.1). The risk of resistance formation against Carbamate fungicides is regarded to be low to medium by FRAC (Fungicide Resistance Action Committee. This applies to the use of Carbamate fungicides in agriculture, where yearly applications to the same fields are possible (even more than one application per season is possible).	
5.7.2	**Management strategies**	Based on the unspecific mode of action for IPBC the risk of resistance formation is regarded to be low and therefore no management strategies need to be developed.	X
5.8	**Likely tonnage to be placed on the market per year (IIA5.8)**	This is a very sensitive requirement. Information on sales volumes will be provided by the TF Members upon request by the RMS.	

Gelöscht: 1

Evaluation by Competent Authorities Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Materials and methods	[redacted]
Conclusion	[redacted]
Reliability	[redacted]
Acceptability	[redacted]
Remarks	[redacted]
	COMMENTS FROM THE NOTIFIER
Date	[redacted]
Results and discussion	
Conclusion	
Reliability	
Acceptability	

Remarks	[redacted]

Section A6.13 Annex Point IIIA, VI.2	Toxic effects on livestock and pets	
	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 required for Product type 6 (in-can preservatives).	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks		

Gelöscht: 1

Section A6.15 Annex Point IIIA, VI.4	Food and feeding stuffs	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] Limited exposure [ ]	Technically not feasible [ ] Scientifically unjustified [ ] Other justification [X]	
Detailed justification:	Products (e.g. paints or washing fluids) containing IPBC as an in-can preservative may be applied on materials which may come in contact with food or feeding stuff. [redacted]	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks		

Gelöscht: [redacted]

Section A7.1.1.2.3 Annex Point IIIA, XII.2.1	Biodegradation in seawater	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	According to the TNsG on data requirements a seawater biodegradation test is not required for product type PT 6 (in-can preservatives). • Therefore, a study on seawater biodegradation is not regarded to be warranted for IPBC.	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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*	
Remarks		

Section A7.1.2.1.2 Annex Point IIIA, XII.2.1	Anaerobic biodegradation
	JUSTIFICATION FOR NON-SUBMISSION OF DATA Official use only **Other justification**
Detailed justification:	According to the TNsG on data requirements, an anaerobic biodegradation study is not required for product type PT 6 (in-can preservatives). Therefore, a study on anaerobic biodegradation is not regarded to be warranted for IPBC.
	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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*
Remarks	

Gelöscht: 1

Section A7.3.1/01 Phototransformation in air (estimation method)

Annex Point IIIA, VII.5

Official use only

1 REFERENCE

1.1	**Reference**	Görg, J., Glöckner, Th. (2007): Estimation of photochemical degradation of IPBC using the Atkinson calculation method; Scientific Consulting Company, Chemisch-Wissenschaftliche Beratung GmbH, 55234 Wendelsheim, Germany; Doc. No. 743-002; 08.06.2007; (unpublished)
1.2	**Data protection**	[redacted]
1.2.1	Data owner	[redacted]
1.2.2	Companies with letter of access	[redacted]
1.2.3	Criteria for data protection	[redacted]

Gelöscht: [redacted]

2 GUIDELINES AND QUALITY ASSURANCE

2.1	**Guideline study**	Not applicable; model calculation according to the Atkinson calculation method.
2.2	**GLP**	[redacted]
2.3	**Deviations**	Not applicable.

3 MATERIAL AND METHODS

3.1	**Test material**	Not applicable.
3.2	**Reference substance**	[redacted]
3.3	**Test solution**	[redacted]
3.4	**Testing procedure**	The photochemical and oxidative decomposition of IPBC in air was evaluated based on theoretical grounds by a calculation according to Atkinson. The calculation was performed with the help of the programme AOPWIN, Atmospheric Oxidation Programme v1.92 for Microsoft Windows 3.1, Windows 95/98, Windows NT (© 2000 US Environmental Protection Agency).

4 RESULTS

4.1	**OH radical reaction rate constant k_{OH}**	[redacted]

Section A7.3.1/01 Phototransformation in air (estimation method)

Annex Point IIIA, VII.5

[redacted]

4.2 Ozone reaction rate constant k_{Ozone}

[redacted]

4.3 Atmospheric half-life using k_{OH}

[redacted]

4.4 Atmospheric half-life using k_{Ozone}

[redacted]

5 APPLICANT'S SUMMARY AND CONCLUSION

5.1 Materials and methods

The photochemical and oxidative decomposition of IPBC in air was evaluated based on theoretical grounds by a calculation according to Atkinson.

5.2 Results and discussion

5.2.1 **Reaction rate**

$k_{OH} = 25.5485 \times 10^{-12}$ cm^3 molecule^{-1} sec^{-1}.

Section A7.3.1/01 Phototransformation in air (estimation method)

Annex Point IIIA, VII.5

	constant	$k_{Ozone} = 42.0 \times 10^{-22}$ cm^3 molecule^{-1} sec^{-1}.
5.2.2	**Tropospherical half life**	The DT_{50} for IPBC is estimated to be 0.628 days (24-hr day), corresponding to 15.072 hours using k_{OH}.
		The DT_{50} for IPBC was estimated to be 2728.568 days using k_{Ozone}.
5.3	**Conclusion**	IPBC degrades quickly in the atmosphere by reacting with OH radicals, having a DT50 value of 0.628 days (24-hr day), corresponding to 15.072 hours. It also reacts with ozone, but with a longer reaction time: The DT50 is 2728.568 days. Considering the fact that IPBC is only slightly volatile (vapour pressure = 1.4 x 10^{-3} Pa), a significant pollution of the air by the use of IPBC can be excluded.
5.3.1	Reliability	[redacted]
5.3.2	Deficiencies	No

Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Materials and Methods	[redacted]
Results and discussion	[redacted]
Conclusion	[redacted]
Reliability	[redacted]
Acceptability	[redacted]
Remarks	
	COMMENTS FROM ...
Date	*Give date of comments submitted*
Materials and Methods	*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*
Results and discussion	*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 A7.3.2 Annex Point IIIA, XII.3	Fate and behaviour in air, further studies	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	According to the TNsG on data requirements an experimental estimation of the fate and behaviour in air is only required if the active substance is to be used in preparations form fumigants or causes risk to the atmospheric environment. [redacted] [redacted]	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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*	
Remarks		

Gelöscht: 1

Section A7.5.2.1 Annex Point IIIA, XIII.3.2	**Reproduction study with earthworm or other soil non-target organisms**
	JUSTIFICATION FOR NON-SUBMISSION OF DATA Official use only
	Scientifically unjustified
Detailed justification:	According to the BPD 98/8/EC and the TNsG on data requirements, long-term terrestrial tests are required if the risk assessment for the terrestrial compartment still indicates a concern for the terrestrial compartment. [redacted] [redacted] • [redacted]
	Evaluation by Competent Authorities
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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*

Gelöscht: [redacted]

Gelöscht: [redacted]

Gelöscht: 1

Section A7.5.2.2 Annex Point IIIA, XIII.3.2	Long-term test with terrestrial plants
	JUSTIFICATION FOR NON-SUBMISSION OF DATA Official use only **Scientifically unjustified**
Detailed justification:	According to the BPD 98/8/EC and the TNsG on data requirements, long-term terrestrial tests are required if the risk assessment for the terrestrial compartment still indicates concern for the terrestrial compartment or if there is long term exposure. [redacted] [redacted] • [redacted]
	Evaluation by Competent Authorities
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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*

Gelöscht: [redacted]

Gelöscht: [redacted]

Section A7.5.3.1.1 Annex Point IIIA, XIII.1.1	Acute oral toxicity to birds	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	Not required for Product type 6 (in-can preservatives).	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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 A7.5.3.1.2 Annex Point IIIA, XIII.1.2	Short-term toxicity to birds	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	Not required for Product type 6 (in-can preservatives).	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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 A7.5.3.1.3 Annex Point IIIA, XIII.1.3	Effects on reproduction of birds
	JUSTIFICATION FOR NON-SUBMISSION OF DATA — Official use only
	Other justification
Detailed justification:	Not required for Product type 6 (in-can preservatives) and Product type 13 (metalworking fluid preservatives).
	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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 A7.5.4.1 **Annex Point IIIA, XIII.3.1**	**Acute toxicity to honeybees and other beneficial arthropods**
	JUSTIFICATION FOR NON-SUBMISSION OF DATA Official use only
	Other justification
Detailed justification:	Not required for Product type 6 (in-can preservatives) and Product type 13 (metalworking fluid preservatives).
	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	[redacted]
Evaluation of applicant's justification	[redacted]
Conclusion	[redacted]
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*

Gelöscht: 1

Section A7.5.6 Annex Point IIIA, XIII.3	Effects on other terrestrial non-target organisms	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	According to the BPD 98/8/EC and the TNsG on data requirements, further tests with other terrestrial non-target organisms may be required if the risk assessment based on long-term terrestrial tests show that there is still a concern for the terrestrial compartment. [redacted] [redacted] • [redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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*	

Gelöscht: [redacted]

Gelöscht: [redacted]

Section A7.5.7.1.1 Annex Point IIIA, XIII.3.4	Acute oral toxicity to mammals	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	Not required for Product type 6 (in-can preservatives).	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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 A7.5.7.1.2 Annex Point IIIA, XIII.3.4	Short-term toxicity to mammals	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	Not required for Product type 6 (in-can preservatives).	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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 A7.5.7.1.3 Annex Point IIIA, XIII.3.4	Effects on reproduction of mammals	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
	Other justification	
Detailed justification:	Not required for Product type 6 (in-can preservatives) and Product type 13 (metalworking fluid preservatives).	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	[redacted]	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
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 A7.6	Summary of ecotoxicological effects and fate and behavior in the environment
	This section number is covered by Document IIA of the dossier.

Section A8.1- A8.7	Measures necessary to protect man, animals and the environment
	The information provided in the PT 8 dossier is applicable for Product type PT 6 (in-can preservatives) and Product type PT 13 (metalworking fluid preservatives).

9 CLASSIFICATION AND LABELLING

The following classification and labelling for the active substance IPBC is proposed:

	Hazard symbol(s):		T, N
-	Indications of danger:		Toxic, Dangerous for the environment
	Risk phrases:	R22	Harmful if swallowed
		R23	Toxic by inhalation
		R37	Irritating to the respiratory system
		R41	Risk of serious damage to the eye
		R43	May cause sensitization by skin contact.
		R50	Very toxic to aquatic organisms.
	Safety phrases:		
		S1	Keep locked up
		S23	Do not breathe vapour/spray.
		S24/25	Avoid contact to skin and eyes.
		S26	In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
		S36/37/39	Wear suitable protective clothing, gloves and eye/face protection.
		S45	In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).
		S61	Avoid release to the environment, refer to special instructions/safety data sheets

Justifications

The above proposed classification and labelling requirements are in line with the findings presented in the dossier for the relevant physico-chemical, toxicological and ecotoxicological studies with IPBC. The labelling and classification triggering findings are:

The labelling and classification triggering findings are:

R22
LD_{50} (rat, oral): 300 – 500 mg/kg bw

R23
Highly toxic with an LC_{50} of about 0.67 mg/L for dust with respirable particle size (MMAD 4.3 µm) and of about 0.78 mg/L for a liquid aerosol with respirable droplet size (MMAD 2.4 µm); and an LC_{50} of about 0.88 mg/L for dust (non-micronised) with 19.2-26.7% of the particles being of a respirable particle size of 6 µm (MMAD of 9.6-14.2 µm) and of about 0.67 mg/L for a combination of micronised and non-micronised dust. Following administration of particles with technical IPBC (particle size mot measured in this particular study) claimed by the notifier to be non-respirable an $LC_{50} > 6.89$ mg/L was determined.
RMS proposes classification as toxic with R23: Toxic by inhalation for technical IPBC regardless of the particle size because of several uncertainties.
First of all the particle size of IPBC in the study by [redacted] 1985, which is the only study out of three which is not leading to the classification as toxic, was not measured so the actual MMAD and proportion of particle less than 10 µm is uncertain and could be different from the one stated in Flack 2001. In the study (Flack, 2001, Doc. No. 111-001) measuring the particle size of technical IPBC used in the representative products and products on the market ≤ 5% of the particles were smaller than 10 µm1. It should be recognised that in the non-key study the MMAD was 9.6-14.2 µm, 19.2-26.7% of the particles being of a particle size of less than 6 µm (and therefore also less than 10 µm) and lead to an LC_{50} of about 0.88 mg/L and therefore RMS is reluctant to disregard the fact that the MMAD in this study (Jackson, 1994) is of comparable particle size (10 µm) with 5% of the particles in technical IPBC being used in products on the market.

R37
The predominant histopathological findings were epithelial hyperplasia in the central region of the larynx, hyperplasia or squamous metaplasia in the ventrolateral region of the larynx, and necrosis of the underlying cartilage of the larynx at concentrations in the air equal to 6.7 mg/m3 (LOAEC 6.7 mg/m^3 with a NOAEC 1 mg/m^3). These histopathological changes, which may be associated with the intrinsic irritating properties of IPBC, are considered as being of relevance to humans although realising the difference in morphology of the upper respiratory tract of rodents and humans and that rodents are obligatory nose breathers, factors which both result in a higher exposure of the rats' larynx compared to the larynx in humans. As the effects on larynx are considered as a local and not a systemic effect R37: Irritating to respiratory system is proposed.

R41
The observed effects persisted throughout the 7 day observation period.

[1] OECD recommends a MMAD of 1-4 µm for acute inhalation studies

R43
The skin sensitising potential of IPBC observed in 3 of 4 GPMTs is supported by data from human case reports.

for R50
Fish acute:
96 h, acute LC_{50} (*Oncorhynchus mykiss*): 67 to 72 µg/L
For algea:
72 h, acute E_bC_{50} (*Scenedesmus subspicatus*): 22 µg/L (E_rC_{50}: 53 µg/L)
For daphnia:
48 h, acute EC_{50} (*Daphnia magna*) : 160 µg/L

The following is proposed in accordance with the latest classification and labelling guidance No 1272/2008:

Labelling elements based on the classification	
GHS pictogram	GHS05, GHS06, GHS09
Signal word	Danger
Hazard class and category code(s)	Acute Tox 3 Acute Tox 4 Skin Sens. 1 Eye Dam. 1 STOT SE3 Aquatic Acute 1 Aquatic Chronic 1*
Hazard statements	H331: Toxic if inhaled H302: Harmful if swallowed H317: May cause an allergic skin reaction H318: Causes serious eye damage H335: May cause respiratory irritation H400: Very toxic to aquatic life H410: Very toxic to aquatic life with long-lasting effects*
Environmental M-factor	10, 1*

* According to Commission Regulation (EU) No 286/2011 (2nd ATP)

Precautionary statements according to the latest classification and labelling guidance No. 1272/2008 have not been assigned.

The Committee for Risk Assessment (RAC) has in addition recently proposed to classify IPBC with STOT RE 1 based on effects seen on larynx after prolonged exposure by inhalation. This proposal has not yet been adopted by the REACH Committee.

Gelöscht: 1

The final classification must when adopted by the REACH Committee be considered during the authorization of biocidal products.

Formatiert: Englisch (USA)

Section A10 Summary and Evaluations of Sections 2 to 9

Please refer to Doc. IIA.