

<b>Section 7.4 and 7.5</b> <b>Annex Points IIA 7 and</b> <b>IIIA 13.2/3</b>	<b>Bridging of eco-toxicity data from DMST to DMSA</b>		
	<b>JUSTIFICATION FOR NON-SUBMISSION OF DATA</b>		Official use only
<b>Other existing data</b> [X]	<b>Technically not feasible</b> [ ]	<b>Scientifically unjustified</b> [ ]	
<b>Limited exposure</b> [...]	<b>Other justification</b> [X].		
<b>Detailed justification:</b>	<p>Aquatic and terrestrial toxicity data for the degradation product of the active substance dichlofluanid, <b>DMSA</b> (Dimethylsulfanilid, CAS 4710-17-2), are bridged from the degradation product of the active substance tolylfluanid (CAS 731-27-1), <b>DMST</b> (Dimethylaminosulfotoluidid, CAS 66840-71-9), in the scope of the PT 21 dossier for dichlofluanid.</p> <p>This bridging is justified because both the actives and their degradation products are very similar with regard to their chemical structure, aqua-toxicity and environmental behaviour.</p> <p>DMST has a considerably larger data base than DMSA. In addition DMST is slightly more eco-toxic than DMSA in aquatic toxicity tests which are available for both compounds. Therefore this bridging approach is related more to a "worst case".</p> <p>Details on the comparison of both actives and their degradation products, DMST and DMSA are presented in Document IIA.</p>		
<b>Undertaking of intended data submission</b> [ ]	–		
<b>Evaluation by Competent Authorities</b>			
<i>Use separate "evaluation boxes" to provide transparency as to the comments and views submitted</i>			
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>			
<b>Date</b>	19/11/13		
<b>Evaluation of applicant's justification</b>	The case for bridging of ecotoxicology data from DMST to DMSA is considered scientifically appropriate, where relevant, due to their similar structures and likely activity and environmental fate - and due to the similarity of their parent compounds. However, if more reliable or sufficiently 'worst case' data on DMSA itself are available, then these should be used.		
<b>Conclusion</b>	The Applicant's justification accepted in cases where bridging from data on DMST to DMSA is considered appropriate.		
<b>Remarks</b>	Whether or not to over-ride the existing endpoints for DMSA agreed under dichlofluanid PT 8 with new bridging information from DMST is a procedural question. The new information could be used in cases where further risk refinement is required.		
<b>COMMENTS FROM OTHER MEMBER STATE (specify)</b>			
<b>Date</b>	<i>Give date of comments submitted</i>		
<b>Evaluation of applicant's justification</b>	<i>Discuss if deviating from view of rapporteur member state</i>		

**Section 7.4 and 7.5**      **Bridging of eco-toxicity data from DMST to DMSA**

**Annex Points IIA 7 and**

**IIIA 13.2/3**

**Conclusion**

*Discuss if deviating from view of rapporteur member state*

**Remarks**