

Helsinki, 15 August 2022

**Addressees**

Registrants of JS\_2280-49-1 as listed in Appendix 3 of this decision

**Date of submission of the dossier subject to this decision**

07 January 2022

**Registered substance subject to this decision ("the Substance")**

Substance name: N-phenyl-N-[(trichloromethyl)thio]benzenesulphonamide

EC number: 218-915-0

**Decision number:** Please refer to the REACH-IT message which delivered this communication (in format TPE-D-XXXXXXXXXX-XX-XX/F)**DECISION ON TESTING PROPOSAL(S)**

Based on Article 40 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below by **20 February 2024**.

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

**Information required from all the Registrants subject to Annex IX of REACH**

1. Effects on soil micro-organisms (Annex IX, Section 9.4.2.; test method: EU C.21./OECD TG 216)
2. Long-term toxicity on terrestrial plants (triggered by Annex IX, Section 9.4.3., column 2; test method: EU C.31./OECD TG 208 with at least six species)

The reasons for the decision(s) are explained in Appendix 1.

**Information required depends on your tonnage band**

You must provide the information listed above for all REACH Annexes applicable to you in accordance with Articles 10(a) and 12(1) of REACH. The addressees of the decision and their corresponding information requirements based on registered tonnage band are listed in Appendix 3.

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

**How to comply with your information requirements**

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

You must follow the general requirements for testing and reporting new tests under REACH, see Appendix 4.

**Appeal**

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

**Failure to comply**

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

Authorised<sup>1</sup> under the authority of Mike Rasenberg, Director of Hazard Assessment

Appendix 1: Reasons for the decision

Appendix 2: Procedure

Appendix 3: Addressees of the decision and their individual information requirements

Appendix 4: Conducting and reporting new tests under REACH

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

## **Appendix 1: Reasons for the decision**

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## Reasons for the decision(s) related to the information under Annex IX of REACH

### 1. Effects on soil micro-organisms

1 Effects on soil microorganisms is an information requirement under Annex IX to REACH (Section 9.4.2).

#### 1.1. Information provided to fulfil the information requirement

2 You have submitted a testing proposal for a Soil Microorganisms: Nitrogen Transformation Test (EU C.21/OECD TG 216).

3 Your registration dossier does not include any information on effects on soil microorganisms.

4 ECHA agrees that an appropriate study on effects on soil microorganisms is needed.

#### 1.2. Test selection and study specifications

5 The proposed Soil Microorganisms: Nitrogen Transformation Test (EU C.21/OECD TG 216) is appropriate to cover the information requirement on effects on soil microorganisms (Guidance on IRs and CSA, Section R.7.11.3.1.).

#### 1.3. Outcome

6 Your testing proposal is accepted under Article 40(3)(a) and you are requested to conduct the test with the Substance, as specified above.

### 2. Long-term toxicity to terrestrial plants

7 Short-term toxicity to terrestrial plants is an information requirement under Annex IX to REACH (Section 9.4.3). Long-term toxicity testing must be considered (Annex IX, Section 9.4., column 2) if the substance has a high potential to adsorb to soil or is very persistent.

#### 2.1. Information provided to fulfil the information requirement

8 You have submitted a testing proposal for a Terrestrial Plant Test: Seedling Emergence and Seedling Growth Test (EU C.31./OECD TG 208, with at least six species) with the following justification:

9 "As described in REACH Guidance document R7.c, Version 3.0 (June 2017) soil hazard category 3 applies for N-phenyl-N-[(trichloromethyl)thio]benzenesulphonamide: The substance is not readily biodegradable and there is no indication that the substance is very toxic to aquatic organisms. The experimentally determined partition coefficient (logKOW: 4.7) and the soil adsorption coefficient (logKOC: 4.5) are both indicative for an adsorptive potential of the substance. *In order to fulfill the requirements according to Table R.7.11-2, a confirmatory long-term toxicity test for terrestrial invertebrates according to OECD TG 222 Earthworm Reproduction Test was conducted and used to calculate the PNEC soil. The trophic level of invertebrates was investigated as it was considered as most relevant. Recent experimental results from an earthworm reproduction test indicate toxicity of N-phenyl-N-[(trichloromethyl)thio]benzenesulphonamide towards the terrestrial compartment. It is*

*therefore required to assess the toxicity towards other terrestrial compartments. According to REACH Regulation (EC) No. 1907/2006, Annex IX, 9.4, column 2 and ECHA Guidance R.7c (2017), long-term terrestrial studies are recommended for compounds with high potential for adsorption to soil. The registrant has carefully considered the available adaptation possibilities applicable for the discussed endpoint. Based on the lack of data on toxicity testing on terrestrial plants and the recommendations in ECHA Guidance R.7c (2017), it is deemed necessary to further investigate the long-term toxicity potential of the substance."*

10 Your registration dossier does not include any information on long-term toxicity to terrestrial plants.

11 ECHA has assessed your testing proposal and notes the following:

12 Under Annex IX, Section 9.4., column 2, for substances that have a high potential to adsorb to soil or that are very persistent, long-term toxicity testing must be considered instead of short-term. Guidance on IRs and CSA, Section R.7.11.5.3. clarifies that a substance is considered to be very persistent in soil if it has a half-life >180 days. In the absence of specific soil data, high persistence is assumed unless the substance is readily biodegradable.

13 Based on the information from your registration dossier, the Substance has a high potential to adsorb to soil and is potentially very persistent:

- the Substance is considered to be highly persistent in soil as it is considered not readily biodegradable (0% biodegradation based on a test performed according to EU method C4-D and 41% mineralisation based on OECD TG 302C);
- the Substance is considered to have high adsorption potential to soil as you report a log K<sub>oc</sub> value of 4.5 based on OECD TG 121.

14 On this basis, information on long-term toxicity on terrestrial plants must be provided.

15 Therefore, ECHA agrees that an appropriate long-term toxicity study on terrestrial plants is needed.

### *2.2. Test selection and study specifications*

16 The proposed Terrestrial Plant Test (EU C.31./OECD TG 208, with at least six species) is appropriate to cover the information requirement for long-term toxicity on terrestrial plants.

17 The OECD TG 208 (EU C.31.) considers the need to select the number of test species according to relevant regulatory requirements, and the need for a reasonably broad selection of species to account for interspecies sensitivity distribution. For long-term toxicity testing, ECHA considers six species as the minimum to achieve a reasonably broad selection. Testing must be conducted with species from different families, as a minimum with two monocotyledonous species and four dicotyledonous species, selected according to the criteria indicated in the OECD TG 208.

### *2.3. Outcome*

18 Your testing proposal is accepted under Article 40(3)(a) and you are requested to conduct the test with the Substance, as specified above.

## References

The following documents may have been cited in the decision.

### ***Guidance on information requirements and chemical safety assessment (Guidance on IRs & CSA)***

- Chapter R.4 Evaluation of available information; ECHA (2011).  
Chapter R.6 QSARs, read-across and grouping; ECHA (2008).  
Appendix to Chapter R.6 for nanoforms; ECHA (2019).  
Chapter R.7a Endpoint specific guidance, Sections R.7.1 – R.7.7; ECHA (2017).  
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).  
Chapter R.7b Endpoint specific guidance, Sections R.7.8 – R.7.9; ECHA (2017).  
Appendix to Chapter R.7b for nanomaterials; ECHA (2017).  
Chapter R.7c Endpoint specific guidance, Sections R.7.10 – R.7.13; (ECHA 2017).  
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).  
Appendix R.7.13-2 Environmental risk assessment for metals and metal compounds; ECHA (2008).  
Chapter R.11 PBT/vPvB assessment; ECHA (2017).  
Chapter R.16 Environmental exposure assessment; ECHA (2016).

***Guidance on data-sharing***; ECHA (2017).

All Guidance on REACH is available online: <https://echa.europa.eu/guidance-documents/guidance-on-reach>

### ***Read-across assessment framework (RAAF)***

- RAAF, 2017 Read-across assessment framework (RAAF), ECHA (2017)  
RAAF UVCB, 2017 Read-across assessment framework (RAAF) – considerations on multi- constituent substances and UVCBs), ECHA (2017).

The RAAF and related documents are available online:

<https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across>

### ***OECD Guidance documents (OECD GDs)***

- OECD GD 23 Guidance document on aquatic toxicity testing of difficult substances and mixtures; No. 23 in the OECD series on testing and assessment, OECD (2019).  
OECD GD 29 Guidance document on transformation/dissolution of metals and metal compounds in aqueous media; No. 29 in the OECD series on testing and assessment, OECD (2002).  
OECD GD 150 Revised guidance document 150 on standardised test guidelines for evaluating chemicals for endocrine disruption; No. 150 in the OECD series on testing and assessment, OECD (2018).  
OECD GD 151 Guidance document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test; No. 151 in the OECD series on testing and assessment, OECD (2013).

## **Appendix 2: Procedure**

ECHA started the testing proposal evaluation in accordance with Article 40(1) on 14 January 2022.

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

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

ECHA did not receive any comments within the commenting period.

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

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

The deadline of the decision is set based on standard practice for carrying out OECD TG tests. It has been exceptionally extended by 6 months from the standard deadline granted by ECHA to take into account currently longer lead times in contract research organisations.

**Appendix 3: Addressees of this decision and their corresponding information requirements**

In accordance with Articles 10(a) and 12(1) of REACH, the information requirements for individual registrations are defined as follows:

- the information specified in Annexes VII, VIII and IX to REACH, for registration at 100-1000 tpa.

<b>Registrant Name</b>	<b>Registration number</b>	<b>Highest REACH Annex applicable to you</b>
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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



## Appendix 4: Conducting and reporting new tests for REACH purposes

### 1. Requirements when conducting and reporting new tests for REACH purposes

#### 1.1. Test methods, GLP requirements and reporting

- (1) Under Article 13(3) of REACH, all new data generated as a result of this decision must be conducted according to the test methods laid down in a European Commission Regulation or to international test methods recognised by the Commission or ECHA as being appropriate.
- (2) Under Article 13(4) of REACH, ecotoxicological and toxicological tests and analyses must be carried out according to the GLP principles (Directive 2004/10/EC) or other international standards recognised by the Commission or ECHA.
- (3) Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries<sup>2</sup>.
- (4) Under the introductory part of Annexes VII/VIII/IX/X to REACH, where a test method offers flexibility in the study design, for example in relation to the choice of dose levels or concentrations, the chosen study design must ensure that the data generated are adequate for hazard identification and risk assessment.

#### 1.2. Test material

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

- (1) Selection of the Test material(s)  
The Test Material used to generate the new data must be selected taking into account the following:
  - the variation in compositions reported by all members of the joint submission,
  - the boundary composition(s) of the Substance,
  - the impact of each constituent/ impurity on the test results for the endpoint to be assessed. For example, if a constituent/ impurity of the Substance is known to have an impact on (eco)toxicity, the selected Test Material must contain that constituent/ impurity.
- (2) Information on the Test Material needed in the updated dossier
  - You must report the composition of the Test Material selected for each study, under the "Test material information" section, for each respective endpoint study record in IUCLID.
  - The reported composition must include all constituents of each Test Material and their concentration values and other parameters relevant for the property to be tested.

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

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers<sup>3</sup>.

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<sup>2</sup> <https://echa.europa.eu/practical-guides>

<sup>3</sup> <https://echa.europa.eu/manuals>