

RAC/M/55/2020 Final 17 December 2020

Minutes of the 55th Meeting

of the Committee for Risk Assessment

(RAC-55)

Monday 30 November, 14.00 to Thursday 3 December, 18.00 and Monday 7 December, 14.00 to Thursday 10 December, 15.30

Summary Record of the Proceedings, and Conclusions and action points

Chair's opening address

The Chair, Tim Bowmer, reflected on the following topics in his opening address:

- With the conclusion of the agenda for this plenary, RAC would be able to complete its 2020 work programme as planned. The Chair thanked members for their extra efforts last month when the 10 delayed CLH dossiers from the first lockdown in March were completed by the Committee
- As the participants survey on virtual meeting experience was last performed in June of this year, an end-of-year survey will be carried out right after the RAC-55 plenary meeting.
- ECHA staff have returned to full teleworking due to the Covid-19 situation in Finland and according to the latest decision, there will be no face-to-face external meetings at ECHA before 30 June 2021. RAC meetings will remain virtual until then.
- The Secretariat is still investigating alternative meeting software, which will be tested further with smaller meetings (e.g. the AfA WG in February) before making any changes in RAC. Until then, the meeting software will stay the same.

The Chair informed the Committee that Ms Stephka Chankova-Petrova resigned from her position as a RAC Member on 27 November 2020. He also noted that Ms Annamarie Losert and Mr Daniel Borg were attending their last meeting of RAC and thanked all three members for their significant contributions to the work of the Committee.

Agenda point		
Conclusions / agreements / adoptions	Action requested after the meeting (by whom/by when)	
2. Adoption of the Agenda		
The Agenda (RAC/A/55/2020) was adopted.	SECR to upload the adopted Agenda to the RAC CIRCABC and to the ECHA website as part of the RAC-54 minutes.	
	website as part of the RAC-54 minutes.	

4. Appointment of (co-)rapporteurs

a) Appointment of (co-)rapporteurs for CLH	-
dossiers, restriction dossiers, authorisation	
applications, evaluation of occupational	
exposure limits	
The Secretariat collected the names of volunteers for	
rapporteurships for CLH dossiers, restriction dossiers	
and applications for authorisation, as listed in the	
restricted documents in the Interact collaboration	
tool. The Committee agreed upon the proposed	
appointments of the Rapporteurs for the intentions	
and/or newly submitted CLH dossiers, as well as to	
the pool of volunteers for the applications for	
authorisation and for the restriction dossier.	
E. Depart from other ECUA hadies and activ	ition
3. Report from other ECHA bodies and activ	
a) KAC WORK plan for all processes	
The chair presented the RAC work plan for 2021.	The eccustoriat informed the Committee
	about the administrative improvements
b) ECHA administrative improvement	related to members' annual review of
proposals	Declaration of Interest and the
	stakeholder participation
6. Request under Article 77(3)(c)	
1) DNEL development for trixylyl phosphate	
The Rapporteurs presented the RAC draft note on the	changes in the adopted note
properties of trivulul phosphate	
	SECR to publish the RAC note on the
RAC adopted the note by consensus	ECHA website.
The adopted the note by consensus.	
	I
2) Revision of derogations from proposed re	strictions on perfluorooctanoic acid
(PFOA), its salts and PFOA-related substance (CO-C14 DECA), their calts and CO-C14 DECA	es; C9-C14 perfluorocarboxylic acids
RAC rapporteur presented and RAC discussed the	Bannorteur to make final editorial
draft opinion on the Article $77(3)(c)$ request on	changes in the adopted opinion.
revision of derogations from proposed restriction on	
PFOA/PFCAs.	SECR to prepare the compiled RAC and
	SEAC opinion package and send it to
RAC supported the rapporteur's conclusions to	
keep 2000 ppb, but to add 'any' perfluoroalkoxy	
group, and to require decreasing the concentration	
to 100 ppb within 3 years for derogation #1.	
RAC supported 1000 ppb PFOA and a specific end	
date in July 2022 for derogation #2.	

RAC did not support the derogation for C9-C14 PFCAS (derogation #3).

RAC supported 10 ppm and proposes a review in July 2022, or at the latest two years after the entry into force of the restriction (derogation #4).

The first part of derogation #5 concerns the use of PFOA (until 2023) as a polymerisation aid in the production of fluoropolymers. There is no use of PFOA (or C9-C14 PFCAs) as polymerisation aid in the EU, so the derogation is not needed. It is outside the scope of ECHA/RAC to propose a deletion of §5 from the PFOA regulation, so to obtain an alignment, inclusion of this unnecessary derogation is proposed for C9-C14 PFCAs in the ECHA analysis. RAC agreed to this. RAC noted that the second derogation, for use in fire-fighting foams (#6), is already aligned, as both restrictions contain the same derogation.

RAC adopted the opinion by consensus.

The expert accompanying occasional stakeholder (PlasticsEurope) questioned the move from 400 ppb to 100ppb and asked clarifying questions regarding the alignment of derogation 5. The expert accompanying the regular CEFIC stakeholder asked for alignment with the EU POP regulation. The regular EEB stakeholder also asked clarifying questions.

3) Classification for acute inhalation toxicity of EGBE

The Chair welcomed the ECETOC Occasional Stakeholder Observer, with an accompanying expert, and the expert accompanying the CEFIC Regular Stakeholder Observer. He reminded that on 14 September 2018, RAC had adopted an opinion on the harmonised classification and labelling of EGBE, which concluded that regarding acute inhalation toxicity this substance should be classified as <u>Acute Tox. 3; H331</u>. New information had been provided by Industry addressing the adopted classification for acute inhalation toxicity and RAC was requested, based on Article 77(3)(c), to review its opinion of 14 September 2018 in relation to the classification for acute inhalation toxicity. The *ad hoc* consultation was carried out prior to RAC-55. Legal deadline for the adoption of an opinion is 13 May 2021.

RAC took note of the new information, including a	Rapporteur to revise the opinion in
new acute inhalation study but concluded that the	accordance with the discussion in RAC
classification agreed by the Committee in 2018	and to provide it to SECR.
(Acute Tox. 3; H331 (ATE=3 mg/L/4h)) is still	
warranted.	SECR to make an editorial check of the
	opinion documents in consultation with
	the Rapporteur.
	SECR to forward the adopted opinion
	and its annexes to COM and publish it on
	the ECHA website.

The expert accompanying the CEFIC Regular Stakeholder Observer and the expert accompanying the ECETOC Occasional Stakeholder Observer commented extensively on acute inhalation toxicity.

4) Classification for environmental toxicity of lead

The Chair welcomed the experts accompanying the CEFIC and the Eurometaux Regular Stakeholder Observers and reminded that on 30 November 2018, RAC had adopted an opinion on the harmonised classification and labelling of lead, which concluded that for both the massive and the powder forms, it should be classified as Aquatic Acute 1 (M = 1) and Aquatic Chronic 1 (M = 10). New information had been provided by Industry on the chronic toxicity of lead in the pond snail *Lymnea stagnalis* (OECD TG 243) and RAC was requested, based on Article 77(3)(c), to review its opinion of 30 November 2018 as regards to the environmental classification of lead. The *ad hoc* consultation was carried out prior to RAC-55. The Commission's deadline for the adoption of an opinion is 13 May 2021.

RAC discussed the first draft opinion.	Rapporteurs, with the support from the
Some members expressed support for the rapporteur's initial analysis, pointing towards one entry on Annex VI. The Chairman noted that more information was required before the Committee could conclude with a robust justification. The following points were discussed and/or agreed:	 ad hoc group, to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. SECR to table the revised draft opinion for another RAC discussion at RAC-56 in March 2021.
 It was agreed to review and consider previous metal classifications under DSD, including the ATP entries. The Commission is kindly requested to clarify what was meant with CLP Annex 1 section 1.3.4 and section 1.2.3.3 of the CLP guidance. It was agreed that Industry will provide data on the proportion of powder and massive lead. Stakeholders and MSs, including DK (the previous DS), are kindly requested to provide any original supporting documents which could explain the meaning of the term "special process". Industry agreed to provide further details of the source material used in the atomisation production technique for lead powder. 	

The COM observer commented on some of the legal interpretations of the CLP regulation and the guidance made by the Rapporteurs and promised to help clarify these issues after RAC-55. The Eurometaux Regular Stakeholder Observer and the expert accompanying the CEFIC Regular Stakeholder Observer also commented on the interpretation made by the Rapporteurs of section IV.5.5 of the CLP guidance and on several aspects of the RAC draft opinion.

7. Health based exposure limits at the workplace

a) Opinion development

1. Cadmium and its inorganic compounds – first draft opinion

The Chairman welcomed the experts accompanying the regular Eurometaux stakeholder observers, one occasional stakeholder as well as the three observers from the DG-EMPL, Advisory Committee for Safety and Health at Work (ACSH) - "Working Party on Chemicals (WPC).

Directive (EU) 2019/37/EC, the third amendment of the Carcinogens and Mutagens Directive (Dir 2004/37/EC) was published on 5 June 2019, and included cadmium and its inorganic compounds in Annex III. However in Recital (17) it stated that "*....the Commission should, no later than three years after the date of entry into force of this Directive, assess the option of amending Directive 2004/37/EC by adding provisions on a combination of an airborne occupational exposure limit and a biological limit value for cadmium and its inorganic compounds".* Therefore, the Commission made a request on 08/01/2020, with a deadline of 18 months, to ECHA to evaluate the following chemical agents: **Cadmium and its inorganic compounds,** in particular *"to assess the option of an airborne occupational exposure limit (OEL) and/or a combination of an airborne occupational exposure limit (OEL) and/or a combination of an airborne occupational exposure limit and its inorganic compounds the health of workers".*

A call for evidence in the preparatory phase inviting interested parties to submit comments and evidence on the subject took place from 2 March 2020 to 2 June 2020. The ECHA scientific report was open for a two month consultation from 14 September to 12 November 2020.

During the opinion development process the ECHA scientific report will be transferred to an Annex to the RAC opinion.

RAC discussed the first draft opinion and the Scientific Report on the scientific evaluation of limit values for Cadmium and its inorganic compounds.	Rapporteurs to prepare the draft final opinion taking into account RAC-55 discussions.
The following points were discussed and/or agreed:	
 It was agreed that a combination of an 8 h air limit value (OEL) and a biological limit value (BLV) would be more effective in protecting the health of workers than either of them alone. A robust justification would need to be included in the final opinion. It was supported that in this specific case, data from the general population needs to be considered when discussing the occupational limit values for cadmium. Taking the cumulative cadmium exposure from all sources (inhalation, food, hand to mouth, dermal) into account would protect workers, also after their occupational career. 	

 RAC discussed uncertainties concerning 	
setting an air limit value but supported as a starting point the value of 0.001 mg/m ³	
(inhalable fraction), currently set in the Carcinogens and Mutagens Directive. More	
justification on the air limit value would need to be inserted in the final opinion.	
Further discussion and agreement on the values (OEL and BLV) is foreseen at RAC-56.	

The expert accompanying the regular Eurometaux stakeholder observer commented on the relevance of human lung cancer data to consider in the derivation of the air limit value and on the uncertainties associated with the data from the general population at very low exposure levels, if used to derive occupational exposure limit values for cadmium. The observer from the Advisory Committee for Safety and Health at Work (ACSH) - "Working Party on Chemicals (WPC), representing the Employers Interest Group, commented on the approach in general to consider data from the general population when discussing occupational exposure limits.

8. Harmonised classification and labelling (CLH)

8.1 CLH dossiers

- A. Substances with hazard classes for agreement by A-listing following the usual scrutiny but without plenary debate
- C. I. Disperse Blue 124: skin sensitisation
- Bentazone (ISO): acute oral toxicity, skin sensitisation, acute aquatic hazards, chronic aquatic hazards
- Margosa ext.: physical hazards (explosives, flammable gases, flammable aerosols, oxidising gases, gases under pressure, flammable liquids, flammable solids, self-reactive substances and mixtures, pyrophoric liquids, pyrophoric solids, substances and mixtures which in contact with water emit flammable gases, oxidising liquids, oxidising solids, organic peroxides, substances and mixtures corrosive to metals), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, carcinogenicity, STOT SE, STOT RE, acute aquatic hazards, chronic aquatic hazards
- Benfluralin (ISO): physical hazards, acute aquatic hazards, chronic aquatic hazards, hazardous to the ozone layer
- Melamine: germ cell mutagenicity
- Valifenalate: physical hazards (explosives, flammable solids, self-heating substances, oxidising solids), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, STOT SE, STOT RE, chronic aquatic hazards, hazardous to the ozone layer

- Isopyrazam: physical hazards (explosive, flammable solid, self-reactive substance or mixture, pyrophoric solid, self-heating substance or mixture, substance which in contact with water emit flammable gases, oxidising solid, corrosive to metals), acute dermal and

inhalation toxicity, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, STOT RE, acute aquatic hazards, chronic aquatic hazards

- 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta-PSCA Na-TEA): STOT RE

- 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA): STOT RE

- 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA): STOT RE

B. Substances with hazard classes for agreement in plenary session

- 1) Bentazone (ISO) (EC: 246-585-8; CAS: 25057-89-0)
- 2) Margosa ext. (EC: 283-644-7; CAS: 84696-25-3)
- 3) Perfluroheptanoic acid (PFHpA) (EC: 206-798-9; CAS: 375-85-9)
- 4) Bisphenol S (EC: 201-250-5; CAS: 80-09-1)
- 5) Melamine (EC: 203-615-4; CAS: 108-78-1)
- 6) Valifenalate (EC: -; CAS: 283159-90-0)
- 7) Isopyrazam (EC: -; CAS: 881685-58-1)
- 8) 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta-PSCA Na TEA) (EC: 701-271-4; CAS: -)
- 9) 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA) (EC: 206-798-9; CAS: 375-85-9)
- 10) 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA) (EC: 701-162-1; CAS: -)
- 11)Divanadium pentaoxide

1. Bentazone (ISO) (EC: 246-585-8; CAS: 25057-89-0)

The Chair welcomed the Dossier Submitter representative and the expert accompanying the ECPA Regular Stakeholder Observer. He explained that bentazone (ISO) acts as a selective post-emergent herbicide against broadleaved weeds in a broad range of crops, including cereals, maize, legume vegetables (pulses), bulb vegetables and forage crops (alfalfa, clover). The substance has an existing Annex VI entry as Acute Tox. 4*; H302, Eye Irrit. 2; H319, Skin Sens. 1; H317 and Aquatic Chronic 3; H412. Legal deadline for the adoption of an opinion is 2 April 2021.

The DS (NL) proposes to modify Acute Tox. 4; H302 (ATE=1640 mg/kg bw), to retain Skin Sens. 1; H317, to add Repr. 2; H361d and to remove Aquatic Chronic 3; H412.

Acute oral toxicity, skin sensitisation, reproductive toxicity and hazardous to the aquatic environment were open for comments during the Consultation.

RAC adopted by consensus the opinion with a
proposal for the harmonised classification and
labelling as indicated in Table 1 below.**Rapporteurs** to revise the opinion in
accordance with the discussion in RAC
and to provide it to SECR.

[Acute Tox. 4; H302 (ATE=1600 mg/kg bw, Skin Sens. 1; H317, Repr. 2; H361d]	SECR to make an editorial check of the opinion documents in consultation with the Rapporteurs.
RAC agreed on no classification for fertility, acute and chronic aquatic toxicity.	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

2. Margosa ext. (EC: 283-644-7; CAS: 84696-25-3)

The Chair welcomed the Dossier Submitter representative and the expert accompanying the ECPA Regular Stakeholder Observer. He explained that margosa, ext. [from the kernels of *Azadirachta indica* extracted with water and further processed with organic solvents] is an active substance in the meaning of Regulation (EU) No 528/2012. The substance has no current Annex VI entry. Legal deadline for the adoption of an opinion is 1 May 2021.

The DS (DE) proposes to classify the substance as Repr. 2; H361d, Skin Sens. 1; H317 and Aquatic Chronic 1; H410 (M=10).

Physical hazards (explosives, flammable gases, flammable aerosols, oxidising gases, gases under pressure, flammable liquids, flammable solids, self-reactive substances and mixtures, pyrophoric liquids, pyrophoric solids, substances and mixtures which in contact with water emit flammable gases, oxidising liquids, oxidising solids, organic peroxides, substances and mixtures corrosive to metals), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, carcinogenicity, reproductive toxicity, STOT SE, STOT RE and hazardous to the aquatic environment were open for comments during the Consultation.

RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.	Rapporteurs to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.
[Skin Sens. 1; H317, Repr. 2; H361d, Aquatic Chronic 1; H410 (M=10)]	SECR to make an editorial check of the opinion documents in consultation with the Rapporteurs.
RAC agreed on no classification for the other hazard classes considered.	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

The expert accompanying the ECPA Regular Stakeholder Observer commented on developmental toxicity.

3. Perfluroheptanoic acid (PFHpA) (EC: 206-798-9; CAS: 375-85-9)

The Chair informed that perfluoroheptanoic acid is a degradation product from C8 per- and polyfluorinated substances. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 24 April 2021.

The DS (BE) proposes to classify the substance as Repr. 1B; H360D and STOT RE 1; H372 (liver).

Reproductive toxicity and STOT RE were open for comments during the Consultation.

RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.	Rapporteurs to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.
[Repr. 1; H360D, STOT RE 1; H372 (liver)]	SECR to make an editorial check of the opinion documents in consultation with
RAC agreed on no classification for sexual function and fertility based on conclusive data and for effects	the Rapporteurs.
on or via lactation based on inconclusive data.	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

4. Bisphenol S (EC: 201-250-5; CAS: 80-09-1)

The Chair welcomed the Occasional Stakeholder Observer from PlasticsEurope and the experts accompanying the CEFIC Regular Stakeholder Observer and the PlasticsEurope Occasional Stakeholder Observer. Bisphenol S is used in articles, by professional workers, in formulation, or re-packaging at industrial sites and in manufacturing. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 10 April 2021.

The DS (BE) proposes to classify the substance as Repr. 1B; H360FD.

Reproductive toxicity was the only hazard class open for comments during the Consultation.

RAC adopted by consensus the opinion with a	Rapporteur to revise the opinion in
proposal for the harmonised classification and	accordance with the discussion in RAC
labelling as indicated in Table 1 below.	and to provide it to SECR.
[Repr. 1B; H360FD]	SECR to make an editorial check of the opinion documents in consultation with the Rapporteur.
	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

The expert accompanying the CEFIC Regular Stakeholder Observer commented on sexual function and fertility and on developmental toxicity. The expert accompanying the PlasticsEurope Occasional Stakeholder Observer commented on developmental toxicity.

5. Melamine (EC: 203-615-4; CAS: 108-78-1)

The Chair welcomed the Dossier Submitter representative and the experts accompanying the CEFIC and the Eurometaux Regular Stakeholder Observers. He explained that melamine is used in articles, by professional workers (widespread uses), in formulation or re-packing, at industrial sites and in manufacturing. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 15 May 2021.

The DS (DE) proposes to classify the substance as Carc. 2 and STOT RE 1; H372 (urinary tract).

Germ cell mutagenicity, carcinogenicity and STOT RE were open for comments during the Consultation.

RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and	Rapporteurs to revise the opinion in accordance with the discussion in RAC
labelling as indicated in Table 1 below.	and to provide it to SECR.
[Carc. 2; H351, STOT RE 2; H373 (urinary tract)]	SECR to make an editorial check of the opinion documents in consultation with
RAC agreed on no classification for germ cell	the Rapporteurs.
mutagenicity.	
	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

The expert accompanying the CEFIC Regular Stakeholder Observer commented on STOT RE and carcinogenicity.

6. Valifenalate (EC: -; CAS: 283159-90-0)

The Chair welcomed the expert accompanying the ECPA Regular Stakeholder Observer. Valifenalate is an active substance in the meaning of Regulation (EU) No 1107/2009. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 15 May 2021.

The DS (HU) proposes to classify the substance as Aquatic Chronic 2; H411.

Physical hazards (explosive, flammable solid, self-heating substance, oxidising solid), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, carcinogenicity, reproductive toxicity, STOT SE, STOT RE, hazardous to the aquatic environment and hazardous to the ozone layer were open for comments during the Consultation.

RAC adopted by consensus the opinion with a	Rapporteurs to revise the opinion in
proposal for the harmonised classification and	accordance with the discussion in RAC
labelling as indicated in Table 1 below.	and to provide it to SECR.
[Carc. 2; H351, Aquatic Chronic 2; H411]	SECR to make an editorial check of the opinion documents in consultation with
RAC agreed on no classification for the other hazard classes considered.	the Rapporteurs.
	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.

The expert accompanying the ECPA Regular Stakeholder Observer commented on sexual function and fertility.

7. Isopyrazam (EC: -; CAS: 881685-58-1)

The Chair welcomed the expert accompanying the ECPA Regular Stakeholder Observer and informed that isopyrazam is an active substance in the scope of Regulation (EC) 1107/2009. It

is a broad spectrum foliar fungicide. The substance has no current Annex VI entry. Legal deadline for the adoption of an opinion is 30 January 2021.

The DS (NO) proposes to classify the substance as Repr. 1B; H360D, Skin Sens. 1B; H317, Aquatic Acute 1; H400 (M=10) and Aquatic Chronic 1; H410 (M=10).

Physical hazards (explosive, flammable solid, self-reactive substance or mixture, pyrophoric solid, self-heating substance or mixture, substance which in contact with water emit flammable gases, oxidising solid, corrosive to metals), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, carcinogenicity, reproductive toxicity, STOT SE, STOT RE and hazardous to the aquatic environment were open for comments during the Consultation.

RAC adopted by consensus the opinion with a	Rapporteurs to revise the opinion in
proposal for the harmonised classification and	accordance with the discussion in RAC
labelling as indicated in Table 1 below.	(specifically related to the mode-of-
	action for liver and uterine tumours) and
[Carc. 2; H351, Repr. 1B; H360D (SCL ≥ 3%), Skin	to provide it to SECR.
Sens. 1B; H317, Aquatic Acute 1; H400 (M=10),	
Aquatic Chronic 2; H411 (M=10)]	SECR to make an editorial check of the
	opinion documents in consultation with
RAC agreed on no classification for the other hazard	the Rapporteurs.
classes considered.	
	SECR to forward the adopted opinion
	and its annexes to COM and publish it on
	the ECHA website.

The expert accompanying the ECPA Regular Stakeholder Observer commented on acute oral toxicity and on carcinogenicity.

8. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta-PSCA Na TEA) (EC: 701-271-4; CAS: -)

The Chair informed that Penta-PSCA Na TEA is used in lubricants, grease and metal working fluids. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 10 July 2021.

The DS (AT) proposes to classify the substance as Repr. 1B; H360FD and Eye Irrit. 2; H319.

Skin corrosion/irritation, serous eye damage/eye irritation, reproductive toxicity and STOT RE were open for comments during the Consultation.

RAC adopted by consensus the opinion with a	Rapporteurs to revise the opinion in
proposal for the harmonised classification and	accordance with the discussion in RAC
labelling as indicated in Table 1 below.	and to provide it to SECR.
[Repr. 1B; H360FD, Eye Irrit. 2; H319]	SECR to make an editorial check of the
	opinion documents in consultation with
RAC agreed on no classification for skin	the Rapporteurs.
corrosion/irritation and STOT RE.	

SECR to forward the adopted opinion
and its annexes to COM and publish it on
the ECHA website.

9. 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1yl]hexanoic acid (Tetra-PSCA) (EC: 206-798-9; CAS: 375-85-9)

The Chair informed Tetra-PSCA is used in lubricants, grease and metal working fluids. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 10 July 2021.

The DS (AT) proposes to classify the substance as Repr. 1B; H360FD (H360D: SCL \geq 0.03%) and Eye Irrit. 2; H319.

Skin corrosion/irritation, serous eye damage/eye irritation, reproductive toxicity and STOT RE were open for comments during the Consultation.

RAC adopted by consensus the opinion with a	Rapporteurs to revise the opinion in
proposal for the harmonised classification and	accordance with the discussion in RAC
labelling as indicated in Table 1 below.	and to provide it to SECR.
[Repr. 1B; H360FD, Eye Irrit. 2; H319]	SECR to make an editorial check of the
	opinion documents in consultation with
RAC agreed on no classification for skin	the Rapporteurs
corrosion/irritation and STOT RE	
	CECD to forward the adapted opinion
	and its annexes to COM and publish it on
	the ECHA website.

10. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA) (EC: 701-162-1; CAS: -)

The Chair informed that Penta-PSCA is used in lubricants, grease and metal working fluids. It has no current Annex VI entry. Legal deadline for the adoption of an opinion is 10 July 2021.

The DS (AT) proposes to classify the substance as Repr. 1B; H360FD (H360D: SCL \geq 0.03%).

Skin corrosion/irritation, serous eye damage/eye irritation, reproductive toxicity and STOT RE were open for comments during the Consultation.

RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.	Rapporteurs to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.
[Repr. 1B; H360FD] RAC agreed on no classification for skin	SECR to make an editorial check of the opinion documents in consultation with the Rapporteurs.
corrosion/irritation, serious eye damage/eye irritation and STOT RE.	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
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11. Divanadium pentaoxide

The Chair welcomed the Dossier Submitter representatives and the expert accompanying the Eurometaux Regular Stakeholder Observer. The Chair reminded that RAC had adopted its opinion on the divanadium pentaoxide dossier at RAC-54 in September 2020. However, after the meeting and prior to completion of the final text, the Rapporteur brought to the attention of the Chair new information regarding the interpretation of the OECD TG 436 for acute inhalation toxicity that would further support Cat. 2. In parallel, the Rapporteur also addressed Industry's representatives' comments regarding the reported tissue burden levels of Vanadium in the NTP (2002) inhalation study and the discussion that followed during the RAC-54 meeting.

The issues raised by the Rapporteur, although not implying a change in the classification agreed, were more substantial than editorial changes. Therefore, exceptionally and in the interests of accuracy and transparency, the Chair decided to take the opinion back to RAC to give Members another opportunity to discuss these specific points before it is finalised and sent to the Commission.

RAC took note of the new information related to	Rapporteur to make the final
acute inhalation toxicity and carcinogenicity but did	amendments to the RAC opinion and to
not change its earlier classification conclusion (Acute	provide it to SECR.
Tox. 2; H330 (ATE=0.05 mg/L (dusts or mists) and	
Carc. 1B; H350) as a result of the new information.	SECR to forward the adopted opinion
	and its annexes to COM and publish it on
	the ECHA website.

The Eurometaux Regular Stakeholder Observer as well as the expert accompanying the Eurometaux Regular Stakeholder Observer commented on carcinogenicity.

9. Restrictions

9.1 General restriction issues

a) Updated Framework for RAC and SEAC in checking conformity and developing opinions on restriction proposals

RAC took note of the presentation by the Secretariat	SECR to arrange a RAC written
on its plans to update the Framework paper for	consultation of the updated version.
restrictions.	
	SECR to arrange a specific capacity
	building training for RAC members in
	spring 2021.

9.2 Restriction Annex XV dossiers

a) Conformity check

1. Substances in single-use diapers

The Chair welcomed the Dossier Submitter's representatives from France, the occasional stakeholder observers from EDANA as well as EURATEX and their accompanying expert from the Bavarian Textile and Apparel Association. He informed the participants that the restriction dossier had been submitted in October 2020 and concerns substances in single-use baby diapers.

PAC agreed that the dession conforms to the Appen	SECR to compile the RAC and SEAC final
VV requirements	outcomes of the conformity check and
XV requirements.	upload to S-CIRCABC.
RAC took note of the recommendations to the	

Dossier Submitter.

The occasional stakeholder observer from EDANA commented on various aspects mentioned in the dossier.

b) Opinion development

1. Perflurohexanoic acid (PFHxA) - third draft opinion

The Chair welcomed the Dossier Submitter's representatives from Germany, regular stakeholder observers with their accompanying experts (to CEFIC, ClientEarth and EEB), the occasional stakeholder observers from PlasticsEurope, EDANA, EURATEX, EUROFEU, together with their accompanying experts. He informed the participants that the restriction dossier had been submitted in December 2019 and concerns the manufacture, use and placing on the market of perfluorohexanoic acid (PFHxA), its salts and the related substances.

The rapporteurs presented and RAC discussed the	Rapporteurs to prepare the fourth
third draft opinion.	draft opinion, taking into account RAC-
	55 discussions and the timely provision
RAC reconfirmed (as already agreed at RAC-54), the	of missing information by the Dossier
revised degradation factors of	Submitter, by early/mid February 2021.
 7% for low molecular weight precursors using 	
6:2 FTOH as surrogate	Rapporteurs to take into account the
- 1% for SFPs using read-across to the same	study on the degradation factor for SFP
factor as used in the restriction for PFOA, its	mentioned by stakeholders during
salts and related substances.	plenary (see reply 3030 to the
	consultation).
RAC provisionally agreed on the approach and/or	
conclusions concerning emissions from the main use	Rapporteurs, to further refine
sectors, subject to further clarifications of the	elements of the evaluation of the
methodology and refinement of the descriptions of	emissions assessment, including:
uncertainties in the Dossier Submitter's final update	
of the Background Document planned for 8 January	 how much weight to put on the data
2021. Furthermore, RAC noted that	for low molecular weight related
 Emission estimates are uncertain due to data 	substances in the emissions
gaps on uses, use volumes, operational	assessment for greaseproof
conditions and release factors	paper/board;
 Emission estimates could not be calculated for 	 the uncertainties introduced by
all uses, e.g. cosmetics, building materials,	reliance on aggregated volume
consumer products and the semiconductor	information for fluoropolymers and
industry	C6-SFPs;
 However, RAC considered that there is 	 the implications of information
sufficient information available for key sectors	submitted in the consultation on (i)
to allow the calculation of ranges of potential	emissions from fire-fighting foams
emissions of PFHxA to the environment.	(e.g. average fluorine content of 2%
 For two of the main sectors, greaseproof 	by weight) and (ii) emissions of
paper and textiles (including imported	PFHxA arising from manufacture and
textile), RAC concluded that the Dossier	use of fluoropolymers /
Submitter's assumptions represent an	fluoroelastomers.

unrealistic worst-case and releases are likely	
 be significantly lower. Nevertheless, paper, textile and firefighting foams remain the main emission sources of PFHxA. 	Rapporteurs , to review consistent use of terminology in the opinion, specifically in relation to fluoropolymers and fluoroelastomers.
Specifically:	Dossier Submitter to clarify the
RAC agreed with the rapporteurs' approach for the evaluation of the emissions assessment for greaseproof paper/board used as food contact	Background Document by 8 January 2021.
material. RAC noted that there are large uncertainties in the assessment, particularly for the low molecular weight related substances. RAC concluded that an assumption that 25% of greaseproof paper/board is treated with PFHxA related substance would be a more realistic than the 100% assumed by the Dossier Submitter.	SECR to arrange an open ad hoc Webex meeting on emissions in early 2021 prior to RAC-56.
RAC agreed with the rapporteurs' approach for the evaluation of the emissions assessment for textiles. RAC concluded that emissions are likely to be overestimated and that an assumption that 50% of clothing is treated with PFHxA related substances would be appropriate, compared to the 100% assumed by the Dossier Submitter.	
RAC agreed with the rapporteurs' approach for the evaluation of the emissions assessment for firefighting foams, but noted some uncertainties to be addressed.	
RAC agreed with the Dossier Submitter's approach for inks and photographic uses, for chrome plating and for the manufacture of SFPs. For the manufacture and use of fluoroelastomers, RAC considered, pending updates to the Background Document, whether releases could be in the order of tonnes, rather than kilograms.	
Regarding definitions, RAC acknowledged that fluoroelastomers are not, themselves, within the scope of the proposed restriction.	
RAC agreed that the proposed restriction with targeted derogations and transitional periods is the most appropriate and effective EU wide measure to reduce the emissions and the risks of PFHxA, its salts and related substances. Furthermore, RAC agreed that reduced emissions and reduced cumulative	

emissions are the most appropriate measures of the effectiveness of the restriction.

RAC concluded that the length of transitional periods has an impact on the increase of the environmental pollution stock PFHxA, i.e. that due to its persistence all emitted PFHxA, its salts or related substances will contribute to stocks.

From a risk perspective, RAC concluded that the transitional period should be as short as practically possible - a shorter transitional period will result in a lower increase in risk.

RAC agreed to derogate articles and mixtures placed on the market before entry into force of the restriction (incl. second-hand articles) for practical reasons (identification and destruction) and difficulties related to enforcement. Also, using an item as long as possible is a sustainable use of resources.

RAC supported the inclusion of recycled materials within the scope of the restriction (i.e. with the same concentration limits of virgin materials), consistent with previous PFAS-restrictions. Due to the extreme persistence PFHxA, it will likely remain in articles over successive life cycles.

RAC provisionally concluded (pending completion of the review of consultation comments) that none of the derogations have been supported with sufficient information to provide a clear view of the emissions under the conditions of the proposed restriction, nor described to what extent emissions have been/will be minimised or any conditions to do so.

RAC provisionally concluded that the proposed restriction will be effective

- From a qualitative perspective the scope is effective, i.e. broad, covering all sectors, with targeted derogations (time-limited or unlimited in time)
- The restriction will achieve approximately 50% emissions reduction over the 20 year assessment period following entry into force. However 80% of the remaining emissions are estimated to occur from deposited products and articles which is principally unavoidable

 A complete ban on all uses in all sectors (no derogations) would further decrease emissions and increase the effectiveness 	
- The effectiveness will increase over time (>	
20 years) due to the expiration of time-limited	
20 years) due to the expiration of time-influed	
lives are wards and	
lives are replaced.	
With regard to possible impact on human health and	
the environment, RAC noted that impacts are difficult	
to quantify:	
 Current data show a gap between general 	
human and environmental exposure levels	
and those levels that would cause adverse	
effects. Without any new data, no quantitative	
risk is anticipated at present and in the short-	
term future	
 However, based on the persistency of PFHxA, 	
the ongoing use of the PFHxA, its salts and	
related substances will lead to increasing	
environmental stocks over time, which could	
lead to irreversible adverse effects in the in	
future	
luture.	
Turne she Calence as the set of the second in second she if	
Impact of derogations to be discussed in more detail	
at RAC-56.	
Finally, RAC concluded provisionally, pending further	
discussion, that the proposed restriction is practical,	
enforceable and monitorable.	
Overall, RAC noted that there are uncertainties	
associated with the restriction proposal, but that the	
uncertainties do not change the conclusion that there	
is a risk from PFHxA, its salts and related substances	
that is not adequately controlled.	
The accompanying expert to regular observer (EEB)	asked for clarifications on degradation
	-

The accompanying expert to regular observer (EEB) asked for clarifications on degradation estimates and whether the use of degradation factors (to express releases in terms of PFHxA) resulted in a general underestimation of emissions. The expert accompanying the occasional stakeholder observer (PlasticsEurope) and the regular stakeholders (CEFIC) referred to the study submitted in the consultation on the degradation rate of a specific SFP. The occasional stakeholder observer (EUROFEU) commented on emissions for firefighting foams. The experts accompanying the regular stakeholders (CEFIC) commented on analytical methods and derogations. The occasional stakeholder observer (EURATEX) commented on overestimation of emission estimates as well as on derogations. The expert accompanying the occasional stakeholder observer (PlasticsEurope) restated their comment on the terminology used for fluorinated polymers and commented on alternatives and analytical methods.

10. Authorisation

10.1 General authorisation issues

a) Update on incoming/future applications

The ECHA Secretariat presented the information on	RAC to use overview table presented by
incoming/future applications, expected workload in 2020/2021 and timelines.	the SECR as a guide to harmonise opinions on DUs use of IVD kits.
The ECHA Secretariat presented the information on horizontal issues related to the AFA process.	SECR to consider organising a workshop to discuss presented horizonal issues
 Conditions for IVDs used by hospitals Measurements (frequency, biomonitoring) Excess Lifetime Risk 	related to the AFA process.
RAC discussed and took note of the information.	
b) OPE/NPE ED properties - Adoption of approach	

- Auoption of approa

RAC discussed and agreed the approach to ED	Rapporteurs together with SECR to
properties in the AFA on OPE/NPE.	apply agreed approach in relevant draft
	opinions.
RAC concludes that the current state of knowledge of	
the endocrine disrupting properties, mode(s) of	
action and effects of 4-tert-OP and 4-NPnEO in the	
environment as presented by the applicants is	
insufficient to determine a threshold.	

c) Report from RAC WG on AfAs during October 2020 meeting

The 6th Meeting of the Committee for Risk Assessment Working Group on Applications for Authorisation took place on 27-29 October 2020.

Participants: 20 RAC members, 5 Members' advisers, 2 Regular stakeholder observers, 1 Commission observer, ECHA.

The working group recommended that the following draft opinions were suitable for consideration via the A-listing procedure.

- 202_OPE_Merckle (1 use)
- 198_OPE_Zoetis (uses 1 and 2)
- 199_OPE_Biokit (use 2)
- 197_OPE_NPE_Phadia (2 uses) •

The working group recommended that the following draft opinions were suitable for general agreement at the RAC plenary:

- 196_OPE_Becton (1 use)
- 198_OPE_Zoetis (uses 3 and 4)
- 208_RR1_TCE_BlueCube (1 use)
- 209_CT_Safran (1 use)
- 210_CT_SD_TataSteel (1 use)
- 211_CT_Hubner (3 uses) •

The working group recommended that the following draft opinions required full discussion or discussion on specific points at the RAC plenary:

- 199_OPE_Biokit (use 1)
- 207_NPE_Chemetall (2 uses)

• 193_OPE_PPG (2 uses)

The Secretariat presented the Report of the 6th Meeting of the Committee for Risk Assessment Working Group on Applications for Authorisation. RAC took note of the Report.

10.2 Authorisation applications

1. Discussion on key issues

1) 9 applications for authorisation (EDC, Cr(VI), MOCA, 4-tert-OPnEO) from August 2020 submission window

RAC discussed the key issues in 6 AfAs and 3 RRs / - 12 uses

10.3 Agreement on draft opinions

A. Agreement on draft opinions on AFA by A-listing following the usual scrutiny but without plenary debate

- 1. 197_OPE_NPE_Phadia (2 uses)
- 2. 198_OPE_Zoetis (uses 1 and 2)
- 3. 199_OPE_Biokit (use 2)
- 4. 202_OPE_Merckle (1 use)

The Chair informed the Committee that following the Rapporteurs' proposal, the RAC consultation and the recommendation of the 6th meeting the RAC AFA WG on the 6 draft opinions have been proposed for agreement via the A-listing procedure. ECHA Secretariat presented the summary of the draft opinions.

RAC agreed by consensus the 6 draft opinions on the following AFA cases.

1. 197_OPE_NPE_Phadia (2 uses)	Rapporteurs together with SECR to do
	the final editing of the draft opinion.
Use1: Use as component of buffer solutions for	
the production of purified proteins (cell extraction,	SECR to send the draft opinion to the
chromatographic purification and solvent	applicant for commenting.
exchange) and in-process and final Quality	
Control testing; intended for use as laboratory	
reagents in Scientific Research and Development	
and In Vitro Diagnostic applications.	
RAC concluded that the operational conditions and	
risk management measures described in the	
application are appropriate and effective in limiting	
the risk provided that they are implemented and	
adhered to.	
The use applied for may result in 0 kg/year of	
releases of the substance to the environment.	
RAC agreed:	
1. no additional conditions for the authorisation	

 no monitoring arrangements for the authorisation no recommendations for the review report. 	
Use2: Coating Thyroid Stimulating Hormone Receptor onto articles used as components of IVD reagent systems. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk provided that they are implemented and adhered to. The use applied for may result in 0 kg/year of releases of the substance to the environment.	Rapporteurs together with SECR to do the final editing of the draft opinion. SECR to send the draft opinion to the applicant for commenting.
RAC agreed:1. no additional conditions for the authorisation2. no monitoring arrangements for the authorisation3. no recommendations for the review report.	
2. 198_OPE_Zoetis (uses 1 and 2) Use1: Industrial use as a surfactant in a lysis buffer for the release of proteins and antigens from biological material used in the manufacture of three SERELISA veterinary In Vitro Diagnostic devices (IVDs) for detecting infectious disease in farm animals.	Rapporteurs together with SECR to do the final editing of the draft opinion. SECR to send the draft opinion to the applicant for commenting.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in 0 kg per year emissions of the substance to the environment.	
RAC agreed:1. no additional conditions for the authorisation2. no monitoring arrangements for the authorisation3. no recommendations for the review report.	
Use2: Industrial use in formulation of kits, kit reagents and buffer solutions in two WITNESS and three SERELISA veterinary In Vitro Diagnostic devices (IVDs) used for detecting certain diseases in pets and farm animals.	Rapporteurs together with SECR to do the final editing of the draft opinion. SECR to send the draft opinion to the applicant for commenting.

 RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in 0 kg per year emissions of the substance to the environment. RAC agreed: no additional conditions for the authorisation 	
 no recommendations for the review report. 3. 199 OPF Biokit (use 2) 	Rapporteurs together with SECR to do
	the final editing of the draft opinion.
Use2: <i>Professional use of 4-tert-OPnEO as a detergent during the final use of latex-based, ELISA and CLIA In-Vitro-Diagnostic kits</i>	SECR to send the draft opinion to the applicant for commenting.
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk to the environment. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk to the environment. The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently. The use applied for may result in emissions of 22 kg/year of the substance to the environment for a total of 500 – 3 000 downstream users' sites (i.e. an average per site up to 7 - 44 g/year).	
 RAC agreed: additional conditions for the authorisation All solid and liquid waste containing 4-tert-OPnEO shall be collected for adequate treatment. The treatment shall minimise releases to environmental compartments as far as technically and practically possible. Disposal of solid waste as common waste is not adequate treatment. Release of liquid waste into the sewer system or to surface waters is not adequate treatment. no monitoring arrangements for the authorisation recommendations for the review report In case a review report is submitted, the applicant shall report on a new representative survey of their downstream users about their efforts to 	

collect all solid and liquid waste for adequate treatment, and which treatment methods are applied (e.g., incineration).	
4. 202_OPE_Merckle (1 use) Use1: The use of 4-OPnEO as an emulsifier in a silicone oil emulsion for siliconization of pre-filled syringes in a medicinal product.	Rapporteurs together with SECR to do the final editing of the draft opinion. SECR to send the draft opinion to the applicant for commenting.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently. The use applied for may result in emissions of up to 15 g per year of the substance to the environment in waste water.	
 RAC agreed: 1. no additional conditions for the authorisation 2. no monitoring arrangements for the authorisation 3. recommendations for the review report RAC recommends the applicant to further assess in any review report the feasibility to collect the remaining liquid waste contaminated with 4-tert-OPnEO for adequate treatment, and act on the outcome of the feasibility study. RAC recommends the applicant to monitor at least quarterly / 4 times per year (during the time of operation) 4-tert-OPnEO and its principal degradation products in the waste water from the washing/siliconization machine prior to release to the off-site STP using an analytical method capable of adequately characterising the substance and its principal degradation products in water at an appropriately low level of quantification. The results should be included in any review report, including details of sampling point, the analytical method, the concentrations detected and the corresponding environmental release values. 	
B. Agreement on draft opinions on AFA in pl 1. 193_OPE_PPG (2 uses)	enary session

Use 1: The formulation of a hardener component containing OPE in Aerospace and Defence (A&D) two- part polysulphide sealants. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in 0 kg per year emissions of the substance to the environment. RAC agreed:	Rapporteurs together with SECR to do the final editing of the draft opinion.SECR to send the draft opinion to the applicant for commenting.
 no additional conditions for the authorisation no monitoring arrangements for the authorisation no recommendations for the review report. RAC agreed on the draft opinion by consensus.	
Use 2: Mixing, by Aerospace and Defence	Rapporteurs together with SECR to do
Companies, and their associated supply chains, including the Applicants, of base polysulfide sealant	the final editing of the draft opinion.
components with OPE-containing hardener, resulting in mixtures containing < 0.1% w/w of OPE for Aerospace and Defence uses that are exempt from authorisation under REACH Art. 56(6)(a).	SECR to send the draft opinion to the applicant for commenting.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in up to 2.5 kg per year emissions of the substance to the environment.	
RAC agreed:	
 no additional conditions for the authorisation no monitoring arrangements for the authorisation no recommendations for the review report. 	
RAC agreed on the draft opinion by consensus.	
2. 196_OPE_Becton (1 use)	
Use 1: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated (4-tert-OPnEO) as a processing aid in imported diagnostics.	Rapporteurs together with SECR to do the final editing of the draft opinion.
	SECR to send the draft opinion to the
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions	applicant for commenting.

for the authorisation are expected to result in operational conditions and risk management	
measures that are appropriate and effective in	
limiting the risk. The recommendations for the review	
report are designed to allow RAC to evaluate any	
potential review report efficiently.	
The use applied for may result in up to 18-30 kg per	
year (approximately 0.03 kg per year per	
downstream user site) emissions of the substance to the environment.	
RAC agreed:	
1. Additional conditions for the authorisation	
an adequate treatment. The treatment shall	
minimise releases to environmental	
compartments as far as technically and	
practically possible. Release into the sewer	
system or to surface waters is not considered	
by RAC to be an adequate treatment.	
Downstream users should be instructed to	
collect all solid and liquid waste for an adequate	
treatment and should not discharge liquid	
down the drain	
2. no monitoring arrangements	
3. recommendations for the review report	
In case a review report is submitted, the	
applicant needs to conduct and report on a	
representative survey of their EEA downstream	
users (in terms of number of users and volume	
of diagnostics used) about the treatment	
methods that are applied at that point in time	
(e.g. Incineration) following from the	
containing 4-tert-OPnEO for an adequate	
treatment.	
RAC agreed on the draft opinion by consensus.	
3. 198_OPE_Zoetis (uses 3 and 4)	
Use 3: Professional use as a surfactant in kits, kit	Kapporteurs together with SECR to do
Vitro Diagnostic devices (IVDs) including and	the final editing of the draft opinion.
SERFLISA six ProFLOK six WITNESS and five	SECR to send the draft opinion to the
VetScan. The use is carried out by professional users	applicant for commenting
in diagnostic laboratories and veterinary clinics to	application continenting
detect certain diseases in pets and farm animals.	

RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk.	
The use applied for may result in approximately 1.79 kg/year (worst case) or 0.33 kg/year (realistic reasonable case) per year emissions of the substance to the environment.	
 RAC agreed: additional conditions for the authorisation All the liquid and solid waste shall be collected for adequate treatment. The treatment shall minimise releases to environmental compartments as far as technically and practically possible. Release into the sewer system or to surface waters is not considered to constitute adequate treatment 2. no monitoring arrangements for the authorisation 3. recommendations for the review report In case a review report is submitted, the applicant shall report on a representative survey of their EU downstream users about the treatment methods that are applied at that point in time (e.g. incineration) following from the requirement to collect all the solid and liquid waste containing 4-tert-OPnEO for adequate treatment. 	
RAC agreed on the draft opinion by consensus.	
Use 4: Industrial use as a viral inactivating agent in the manufacture of two veterinary biologic drugs for treatment of osteoarthritis in cats and dogs.	Rapporteurs together with SECR to do the final editing of the draft opinion.
RAC concluded that the operational conditions and risk management measures described in the application are not expected to be appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in emissions over	applicant for commenting.

the authorisation period. This information should also	
be included in the review report.	
The use applied for may result in approximately 10-	
20 kg/year (worst case), 1-10 kg/year (2.07 kg/year	
realistic case) kg per year emissions of the substance	
to the environment.	
RAC agreed:	
1. additional conditions for the authorisation	
All liquid waste releases which will occur during	
the remaining filtration and chromatography	
steps (stream C) shall be collected and	
disposed of for adequate treatment. The	
treatment shall minimise releases to	
environmental compartments as far as	
technically and practically possible. Release	
into the sewer system or to surface waters is	
not considered as adequate treatment.	
As soon as the first measurements obtained	
through monitoring (as described in section 8)	
are available, the applicant shall carry out a	
mass balance analysis that takes those	
measurements into account.	
Based on the results, the applicant shall assess	
how the operational conditions and risk	
management measures can be optimized in	
such a way that the releases of 4-tert-OPnEO	
to the environment can be further minimised	
taking into account the outcomes of the	
monitoring programme and act on the outcome	
of the assessment.	
2. monitoring arrangements for the authorisation	
As soon as full production takes place, the	
applicant shall undertake a monitoring	
programme to measure the concentration of 4-	
tert-OPnEO in individual waste streams prior to	
release to the municipal STP. The initial	
sampling frequency shall be sufficient to take	
account of daily fluctuations and to	
demonstrate the effectiveness of the new	
RMMs that will be implemented.	
Once the appropriate frequency has been	
established, the applicant shall monitor [at	
least quarterly] or [at least 4 times per year]	
4-tert-OPnEO and its principal degradation	
products in the wastewater prior to release to	
the municipal STP, using an analytical method	
capable of adequately characterising the	
substance and its principal degradation	
products at an appropriately low level of	

 quantification. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values. 3. recommendations for the review report The results of the monitoring program, as well as the mass balance and the outcome and conclusions of the actions taken with regards to minimising emissions, should be documented and included in any subsequent authorisation review report. 	
4. 199_OPE_Biokit (use 1)	
Use 1: Industrial use of 4-tert-OPnEO as a detergent in the preparation of reagents for incorporation into latex-based, ELISA and CLIA In-Vitro-Diagnostic kits.	Rapporteurs together with SECR to do the final editing of the draft opinion.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to.	applicant for commenting.
The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently. The use applied for may result in 539 g per year emissions of the substance to the environment.	
 RAC agreed: 1. no additional conditions for the authorisation 2. no monitoring arrangements for the authorisation 3. recommendations for the review report RAC recommends that the applicant should monitor at least quarterly or 4 times per year (during the time of operation) 4-tert-OPnEO and its principal degradation products in the waste water prior to release to the off-site WWTP using an analytical method capable of adequately characterising the substance and its principal degradation products in water at an appropriately low level of quantification. The applicant may reduce the frequency of measurements to one measurement per year after it is shown in four consecutive measurements that the releases are zero. The results should be included in any review report, including details of sampling point, the 	

analytical method, the concentrations detected and the corresponding environmental release values.	
5. 203_OPE_NPE_Qiagen (4 uses)	
Use 1: Formulation and filling of buffer solutions containing 4-tert-OPnEO/4-NPnEO for the manufacturing of and use in in-vitro Diagnostic and Life Sciences kits of the product groups sample preparation, PCR and sequencing.	Rapporteurs together with SECR to do the final editing of the draft opinion with proper justification for placing the monitoring recommendation in section 9 rather than in section 8 of the opinion.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently. The use applied for may result in emissions of 4-tert- OPnEO to the environment of up to 57.03 g per year and in emissions of 4-NPnEO to the environment of up to 52.95 g per year.	SECR to send the draft opinion to the applicant for commenting.
 RAC agreed: 1. no additional conditions for the authorisation 2. no monitoring arrangements for the authorisation 3. recommendations for the review report RAC recommends that the applicants should monitor at the Hilden site at least quarterly/four times per year (when the processes are operating and the substances are used at maximum daily amounts) 4-tert-OPnEO and 4-NPnEO and their principal degradation products in the wastewater prior to release to the public sewage system using an analytical method capable of adequately characterising the substances and their degradation products in water and at an appropriately low level of quantification. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected, and the corresponding environmental release values. RAC agreed on the draft opinion by consensus. 	

Use 2: Industrial use of 4-tert-OPnEO/4-NPnEO in the purification of biomaterial and blocking of non- specific bindings for the use in in-vitro Diagnostic and Life Sciences kits of the product groups sample preparation, PCR and sequencing. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently. The use applied for may result in emissions of 4-tert- OPnEO to the environment of up to 1.09 g per year and in emissions of 4-NPnEO to the environment of up to 78 g per year.	 Rapporteurs together with SECR to do the final editing of the draft opinion with proper justification for placing the monitoring recommendation in section 9 rather than in section 8 of the opinion. SECR to send the draft opinion to the applicant for commenting.
 RAC agreed: 1. no additional conditions for the authorisation 2. no monitoring arrangements for the authorisation 3. recommendations for the review report RAC recommends that the applicant should monitor at least quarterly/four times per year (when the processes are operating and the substances are used at maximum daily amounts) 4-tert-OPnEO and 4-NPnEO and their principal degradation products in the wastewater prior to release to the public sewage system using an analytical method capable of adequately characterising the substances and their degradation products in water and at an appropriately low level of quantification. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected, and the corresponding environmental release values. 	
RAC agreed on the draft opinion by consensus.	Rapporteurs together with SECR to do
OPnEO/4-NPnEO in the purification of biomaterial and blocking of non-specific bindings for the use in in-vitro Diagnostic and Life Sciences kits with regulatory impact of the product groups sample preparation, PCR, sequencing (and immunoassay for 4-tert-OPnEO only).	the final editing of the draft opinion. SECR to send the draft opinion to the applicant for commenting.

RAC concluded that the operational conditions and	
risk management measures described in the	
limiting the risk. The proposed additional conditions	
for the authorization are expected to result in	
operational conditions and risk management	
measures that are appropriate and effective in	
limiting the risk	
The recommendations for the review report are	
expected to allow RAC to evaluate the review report	
efficiently.	
The use applied for may result in emissions of 4-tert-	
OPnEO to the environment of up to 390 kg per year	
(average per site: 1.95-7.8 g) and in emissions of 4-	
NPnEO to the environment of 0 kg per year.	
RAC agreed:	
1. additional conditions for the authorisation	
In addition to the solid waste containing 4-tert-	
OPhEO, all liquid waste containing 4-tert-	
OPhEO generated from the use applied for shall	
be collected for adequate treatment. The	
application and a compartments as far as	
technically and practically possible Pelease	
into the sewer system or to surface waters is	
not adequate treatment	
2. no monitoring arrangements for the authorisation	
3. recommendations for the review report	
In case a review report is submitted, the	
applicants shall report on a representative	
survey of their downstream users about the	
treatment methods that are applied (e.g.	
incineration) following from the requirement to	
collect all liquid waste for adequate treatment.	
RAC agreed on the draft opinion by consensus.	
lise 4: Professional downstream use of 4-tert-	Bannorteurs together with SECR to do
OPnFO/4-NPnFO in the purification of biomaterial	the final editing of the draft opinion
and blocking of non-specific bindings for Life	
Sciences kits without regulatory impact of the	SECR to send the draft opinion to the
product groups sample preparation, PCR and	applicant for commenting.
sequencing.	
RAC concluded that the operational conditions and	
risk management measures described in the	
application are not appropriate and effective in	
imiting the risk. The proposed additional conditions	
for the authorisation are expected to result in	

operational conditions and risk management measures that are appropriate and effective in	
The recommendations for the review report are	
expected to allow RAC to evaluate the review report efficiently.	
The use applied for may result in emissions of 4-tert-	
OPnEO to the environment of up to 22.4 kg per year (average per site: 0.112-0.448 g) and in emissions	
of 4-NPnEO to the environment of 0 kg per year.	
RAC agreed:	
 additional conditions for the authorisation In addition to the solid waste containing 4-tert- 	
OPnEO, all liquid waste containing 4-tert-	
be collected for adequate treatment. The	
treatment shall minimise releases to	
technically and practically possible. Release	
into the sewer system or to surface waters is	
2. no monitoring arrangements for the authorisation	
3. recommendations for the review report In case a review report is submitted, the	
applicants shall report on a representative	
survey of their downstream users about the treatment methods that are applied (e.g.	
incineration) following from the requirement to	
collect all liquid waste for adequate treatment.	
RAC agreed on the draft opinion by consensus.	
6. 207_NPE_Chemetall (2 uses)	
Use 1: The formulation of a hardener component	Rapporteurs together with SECR to do
sealants.	the final eating of the draft opinion.
RAC concluded that the operational conditions and	SECR to send the draft opinion to the
risk management measures described in the	applicant for commenting.
application are appropriate and effective in limiting the risk, provided that they are adhered to.	
The use applied for may result in approximately 0 kg	
per year emissions of the substance to the environment.	
RAC agreed:	
1. no additional conditions for the authorisation	
 no monitoring arrangements for the authorisation no recommendations for the review report. 	

RAC agreed on the draft opinion by consensus.	
Use 2: <i>Mixing, by Aerospace Companies and their</i> <i>associated supply chains, including the Applicant, of</i> <i>base polysulfide sealant components with NPE-</i> <i>containing hardener, resulting in mixtures containing</i> < 0.1 % w/w of NPE for Aerospace uses that are <i>exempt from authorisation under REACH Art.</i> 56(6)(a).	Rapporteurs together with SECR to do the final editing of the draft opinion.SECR to send the draft opinion to the applicant for commenting.
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in up to 1.75 kg per year emissions of the substance to the environment.	
RAC agreed:1. no additional conditions for the authorisation2. no monitoring arrangements for the authorisation3. no recommendations for the review report.	
RAC agreed on the draft opinion by consensus.	
7. 208_RR1_TCE_BlueCube (1 use)	
Use 1: <i>RR1_TCE_BlueCube1 use: Industrial use of trichloroethylene as process chemical (enclosed systems) in Alcantara Material production.</i>	Rapporteurs together with SECR to do the final editing of the draft opinion.
RAC concluded that the operational conditions and	SESK to send the drait opinion to the

The exposure to workers was estimated to be 3.0735 mg/m³ (inhalation) and 2.7867 mg/kg bw (dermal) per 8h adjusted TWA without the effect of the operational conditions and risk management measures. For reference, the current binding Occupational Exposure Limit (BOEL) for this substance is 54.7 mg/m³. The exposure of the general population was estimated to be 0.00357 mg/m³ (inhalation) and 4.19 $\times 10^{-5}$ mg/kg bw/d (dermal) for 24 hours exposure to trichloroethylene for 70 years without the effect of the conditions. Bearing in mind that the route of exposure for the general population may be different from the one relevant for workers.

The excess lifetime cancer risk for workers is estimated to be 2.72×10^{-4} per mg/m³ for 8h TWA exposure for 40 years, per year, for the review period without the effect of the conditions, and 2.47×10^{-7} per mg/m³ for 24h exposure for 70 years, per year, for the review period without the effect of the conditions for the general population.

RAC agreed:

- 1. no additional conditions for the authorisation
- 2. monitoring arrangements for the authorisation

(a) the downstream user of the authorisation holder and/or his downstream users shall continue to conduct regular occupational exposure measurements of trichloroethylene. Those measurements shall:

(i) take place at least annually;

(ii) be based on relevant standard methodologies or protocols;

(iii) comprise both

personal inhalation exposure sampling and static inhalation exposure sampling and biomonitoring (consisting of measurement of the trichloroethylene metabolite trichloroacetic acid in urine).

All these exposure assessment methods should be representative of the range of tasks undertaken and of the total number of workers that are potentially exposed (including process, maintenance and other types of workers involved);

(b) the downstream user of the authorisation holder and his downstream users shall use the information gathered via the measurements referred to in point (a) including the contextual information to regularly review the

effectiveness of the risk management	
measures and operational conditions and to	
introduce measures to reduce worker's	
exposure to trichloroethylene, the downstream	
user of the authorisation holder should	
reconsidered if PPE is overused in specific	
situations;	
(c) the results of the measurements referred to	
in point (a) as well as the outcome and	
conclusions of the review and any actions	
taken in accordance with point (b) shall be	
decumented and upon request be submitted	
to the compotent sutherity of the Member	
Contraction of the authorized use takes place	
State where the authorised use takes place;	
(a) the downstream user of the authorisation	
holder's downstream users shall make	
available the information from the	
measurements referred to in point (a) and the	
conclusions and outcomes of the review	
pursuant to point (b) to the European	
Chemicals Agency, for transmission to the	
downstream user of the authorisation holder	
for the purpose of the review report referred to	
in Article 61(1) of that Regulation;	
(e) the information collected in accordance	
with point (d) shall be included in the review	
report referred to in Article 61(1) of Regulation	
(EC) No 1907/2006.	
3. recommendations for the review report	
The review report shall document the results of	
the monitoring programs and the optimisation	
of RMMs and OCs carried out by the applicant	
in order to minimise exposure and fugitive	
emissions.	
As part of the review of the OCs and RMMs, the	
downstream user of the authorisation holder	
should reconsider if PPF is overused in specific	
situations	
RAC agreed on the draft oninion by consensus	
8. 209_CT_Safran (1 use)	
Use 1: Industrial use of chromium trioxide-based	Rapporteurs together with SECR to do
mixtures for the surface treatment of legacy spare	the final editing of the draft opinion.
parts of military aircraft engines, including safety-	
critical parts whose failure endangers airworthiness.	SECR to send the draft opinion to the
	applicant for commenting.
RAC concluded that the operational conditions and	_
risk management measures described in the	

application are appropriate and effective in limiting the risk, provided that they are adhered to.

The recommendations for the review report are expected to allow RAC to evaluate the review report efficiently.

The exposure to workers was estimated to be 8.1 x $10^{-3} \ \mu g \ Cr(VI)/m^3$ (average exposure value for one worker corrected for RPE, duration and frequency). For reference, the binding Occupational Exposure Limit (BOEL) as of 17 January 2020 for this substance is 5 $\mu g \ Cr(VI)/m^3$ (with a transitional value of 10 $\mu g \ Cr(VI)/m^3$ until 17 January 2025). The exposure to the general population via inhalation at the local scale was estimated to be 1.61 x $10^{-4} \ \mu g/m^3$, while via the oral route it was estimated to be 2.05 x $10^{-4} \ \mu g/kg \ bw/d$. At the regional scale, the exposure via inhalation was estimated to be 1.98 x $10^{-13} \ \mu g/m^3$ and 6.72 x $10^{-7} \ \mu g/kg \ bw/d$ via the oral route.

Based on the above exposures, the excess lifetime cancer risk for workers (inhalation route) is estimated to be 3.21×10^{-5} over 40 years per worker, and, for the general population: 4.83×10^{-6} at local scale and 5.38×10^{-10} at the regional level (inhalation and oral route combined).

RAC agreed:

- 1. no additional conditions for the authorisation
- 2. monitoring arrangements for the authorisation
 - a) The applicant shall continue to conduct annual monitoring programmes for Cr(VI) emissions to air in the environment at least annually. Those programmes shall be based on relevant standard methodologies or protocols and be representative of the OCs and RMMs used at the applicant's site.

b) The information gathered via the measurements referred to in point (a) and related contextual information shall be used by the applicant to evaluate the effectiveness of the RMMs and OCs in place and, if needed, to introduce measures to further reduce Cr(VI) emissions to air to as low a level as technically and practically feasible.

c) The applicant shall ensure that the application of RMMs at their site is in accordance with the hierarchy of control principles.

d) The information from the monitoring programmes referred to in point (a), including the contextual information associated with each of the measurements as well as the outcome
 and conclusions of the review and any action taken in accordance with point (b) shall be documented, maintained and be made available by the applicant, upon request, to the competent national authority of the Member State where the authorised use will take place. 3. recommendations for the review report RAC recommends to conduct an annual occupational exposure monitoring programme for Cr(VI). RAC recommends that the information gathered via the measurements referred to in section 8 point (a) as well as the outcome and conclusions of the review and any action taken in accordance with point (b) should be included in any subsequent authorisation review report. 	
RAC agreed on the draft opinion by consensus.	
9. 210_CT_SD_TataSteel (1 use)	
Use 1: Use of Chromium Trioxide and Sodium Dichromate for Passivation of Electrolytic Tinplate (ETP). RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The monitoring arrangements for the authorisation are expected to provide information on the trends in exposure over the authorisation period. The information should also be included in the review report.	Rapporteurs together with SECR to do the final editing of the draft opinion.SECR to send the draft opinion to the applicant for commenting.
 The exposure to workers was estimated to be at maximum: inhalation (µg/m³): max. 0.220 (Trostre and IJmuiden) dermal (µg/kg bw/d): 25.4 (Trostre), 28.0 (IJmuiden). The exposure to the general population was estimated to be: inhalation, local (µg/m³): 8.12 x 10⁻⁴ (Trostre), 6.61 x 10⁻³ (IJmuiden) oral: local (µg/kg bw/d): 1.50 x 10⁻⁴ (Trostre), 1.12 x 10⁻³ (IJmuiden). The excess lifetime cancer risk for directly exposed workers is estimated to be at maximum: 	

\circ inhalation: 8.8 x 10 ⁻⁴ (Trostre and	
IJmuiden)	
• RCR dermal (reproductive toxicity):	
0.59 (Trostre), 0.652 (IJmuiden),	
 for indirectly exposed workers is estimated to 	
be at maximum:	
\circ inhalation : 3.25 x 10 ⁻⁶ (Trostre), 2.92	
x 10 ⁻⁵ (IJmuiden)	
\circ oral: 3 x 10 ⁻⁸ (Trostre), 2.24 x 10 ⁻⁷	
(IJmuiden).	
The excess lifetime cancer risk for the general	
population is calculated to be:	
 inhalation: 2.35 x 10⁻⁵ (Trostre), 1.92 x 10⁻⁴ 	
(IJmuiden),	
- oral: 1.2 x 10 ⁻⁷ (Trostre), 8.96 x 10 ⁻⁷	
(IJmuiden)	
- combined: 2.36 x 10 ⁻⁵ (Trostre), 1.93 x 10 ⁻⁴	
(IJmuiden).	
RAC agreed:	
1. no additional conditions for the authorisation	
2. monitoring arrangements for the authorisation	
(a) The applicants shall continue to implement	
and conduct an annual exposure monitoring	
programmes for Cr(VI) for both sites. Those	
programmes shall be based on relevant	
standard methodologies or protocols, comprise	
both static and/or personal inhalation exposure	
sampling and be representative of:	
(i) the range of tasks undertaken	
where exposure to chromium is	
possible, including tasks	
involving maintenance workers;	
(ii) the OCs and RMMs typical for	
each of these tasks;	
(iii) the number of workers	
potentially exposed.	
(iv) In case WCS 8 is implemented,	
the applicants shall conduct static	
control measurements	
immediately after the	
establishment of this scenario	
and include this scenario in their	
regular occupational exposure	
monitoring programmes.	
(b) The applicants shall continue conducting	
monitoring programmes for Cr(VI) emissions to	
air at least annually for both sites. Those	
programmes shall be based on relevant	
standard methodologies or protocols and be	

	representative of the OCs and RMMs used at the	
	applicants site.	
	(c) The information gathered via the	
	and related contextual information shall be used	
	by the applicants to evaluate the effectiveness	
	of the PMM and OCs in place and if peeded to	
	introduce measures to further reduce workplace	
	exposure to $Cr(VI)$ and emissions to the	
	environment to a level as low as technically and	
	practically feasible	
	(d) The applicants shall ensure that the	
	application of RMMs at their site is in accordance	
	with the hierarchy of control principles (e.g. use	
	powered respirators instead of non-powered full	
	face masks at the Trostre site);	
	(e) The information from the monitoring	
	programmes referred to in points (a) and (b),	
	including the contextual information associated	
	with each set of measurements as well as the	
	outcome and conclusions of the review and any	
	action taken in accordance with point (c), shall	
	be documented, maintained and be made	
	available by the applicants, upon request, to the	
	national competent authority of the Member	
	State where the authorised use will take place;	
	(f) The applicants may reduce the frequency of	
	measurements, once the applicants can clearly	
	demonstrate to the national competent	
	authority of the Member State where the use	
	takes place, that exposure to humans and	
	releases to the environment have been reduced	
	to a level as low as technically and practically	
	possible and that the RMMs and UCs function	
c	appropriately.	
J.	The information asthered via the	
	me mormation gathered via the	

The information gathered via the measurements referred to in section 8 points (a) and (b) as well as the outcome and conclusions of the review and any action taken in accordance with point (c) shall be included in any subsequent authorisation review report.

RAC agreed on the draft opinion by consensus.

10. 211_CT_Hubner (3 uses)

Use 1: Use 1: Etching of single-component (1K)	Rapporteurs together with SECR to do
plastic articles.	the final editing of the draft opinion.
Use 2: Etching of multi-component (2K/3K) plastic	
articles	

Use 3: The use of chromium trioxide in the functional	SECR to send the draft opinion to the
electroplating of single-component (1K) and multi-	applicant for commenting.
component (2K/3K) plastic articles with the specific	
aim of obtaining a final $Cr(0)$ coating with high	
durability and chemical resistance while preserving	
the lightweight nature of the plastic component	
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The proposed monitoring arrangements for the	
authorisation and recommendations for the review report, are expected to address RAC's minor concerns related to the assessment of the workers' exposure and indirect exposure of humans.	
The exposure to workers was estimated to be (inhalation) 0.88 μ g Cr(VI)/m ³ per 8h adjusted TWA (highest value). The exposure to the general population was estimated to be (inhalation, local)	
3.74*10 ⁻⁴ μ g Cr(VI)/m ³ per 8h TWA and (oral, regional) 1.53*10 ⁻⁹ μ g Cr(VI)/kg bw/d.	
estimated to be (inhalation) $3.52*10^{-3}$ per µg/m ³ (for 8h TWA exposure for 40 years) per year for the	
review period without the effect of the conditions,	
and (inhalation, local) $1.08*10^{-5}$ per μ g/m ³ for 24h	
exposure for 70 years, per year, for the review period	
without the effect of the conditions for the general	
population.	
RAC agreed:	
1. no additional conditions for the authorisation	
2. monitoring arrangements for the authorisation	
1. The applicant shall implement the following	
monitoring programmes for chromium (VI):	
(a) Occupational initialation exposure	
which shall:	
(i) be conducted at least annually or	
more frequently if a substantial	
increase of CrO ₃ consumption takes	
place on site. The frequency of the	
measurements should be sufficient	
to capture any potential increase in	
exposure of workers to Cr(VI);	
(ii) comprise personal and / or static	
inhalation exposure sampling;	
(iii) comprise personal sampling for	

	maintenance workers (WCS 6);	
	(iv) be representative of:	
	a. the range of tasks undertaken	
	where exposure to chromium	
	is possible;	
	b. the OCs and RMMs typical for	
	each of these tasks;	
	c. the number of workers	
	potentially exposed;	
((v) include contextual information	
	about the tasks performed during	
	sampling.	
(b	b) Environmental releases:	
. ((i) the applicant shall continue	
·	conducting their guarterly	
	monitoring programme for Cr(VI)	
	emission to wastewater:	
((ii) the applicant shall at least conduct	
,	annual air emission measurements	
	or more frequently to following any	
	possible changes in the process:	
((iii) the monitoring programmes for	
· · ·	wastewater and air emissions shall:	
	a be based on relevant standard	
	methodologies or protocols:	
	and	
	b, be representative of the OCs	
	and RMMs used at the	
	applicant 's site.	
2. T	he information gathered via the	
m	neasurements referred to in paragraph 1	
а	nd related contextual information shall be	
U:	sed by the applicant to confirm the	
e	ffectiveness of the RMMs and OCs in place	
a	nd, if needed, to introduce measures to	
fi	urther reduce workplace exposure to	
C	r(VI) and emissions to the environment to	
a	s low a level as technically and practically	
fe	easible	
3 T	be applicant shall ensure that the	
3. I	polication of RMMs at their site is in	
2	ccordance with the hierarchy of control	
n	rincinles	
	The information from the monitoring	
т. I	regrammes referred to in paragraph 1	
p :	actuding the contextual information	
11 -	appointed with each act of managements	
a	ssociated with each set of measurements	
a	s well as the outcome and conclusions of	
tr	ne review and any action taken in	
a	ccordance with paragraph 2, shall be	

documented, maintained and be made	
available by the applicant, upon request, to	
the competent national authority of the	
Member State where the authorised use will	
take place	
2 recommendations for the review report	
The results of the reconverse to referred to in	
The results of the measurements referred to in	
section 8 paragraph 1, as well as the outcome	
and conclusions of the review and any actions	
taken in accordance with section 8 paragraph	
2, shall be documented and included in any	
subsequent authorisation review report.	
RAC agreed on the draft opinions by consensus.	
10.4 Adoption of final opinions	
The Applicants submitted comments on the following	draft opinions agreed at RAC 52 and RAC
53.	
1. 143 OPE bioMerieux (3 uses)	
2. 147 CTPht Bilbaina (1 use)	
3. 148 CTPht DEZA (1 use)	
4 149 CTPht Nalon (1 use)	
5 150 CTPht AO Koppers (1 use)	
6 153 CTPht AO Bilbaina (1 use)	
$7 + 162 \text{ ODE } \downarrow \text{EP} (1 \downarrow \text{use})$	
7. 102_OPE_LFB (1 use)	
8. 1/6_OPE_ADDOIL_1 (5 uses)	
9. 184_OPE_LIIIY (1 use)	
10.186_OPE_NPE_Beckman (5 uses)	
11.187_OPE_AGC (2 uses)	
12.188_OPE_Wallac_2 (2 uses)	
1. 143_OPE_bioMerieux (3 uses)	
Use 1: Industrial use of 4-tert-OPnEO for its non-	SECR to send the final opinion to the EC,
ionic detergent properties in the formulation of	MSs and the Applicant.
reagents for molecular in vitro preparative and	
testing applications	
The RAC consultations on the draft Final Oninion has	
heen held 0/-10 November 2020	
been heid 04 10 November 2020.	
BAC concluded that the operational conditions and	
rick management management described in the	
nsk management measures described in the	
application are appropriate and effective in limiting	
the risk, provided that they are adhered to.	
The recommendations for the review report are	
expected to allow RAC to evaluate the review report	
efficiently.	
The use applied for may result in emissions of 2.08	
kg/year of the substance to the environment.	
(monitoring data)	

 RAC agreed for: 1. no additional conditions for the authorisation 2. no monitoring arrangements for the authorisation 3. recommendations for the review report RAC recommends that the applicant should continue quarterly / 4 times/year monitoring of 4-tert-OPnEO (parent substance and its main degradation products) in the waste water prior to release to the local STP using an analytical method capable of adequately characterising the substance in water and at an appropriately low level of detection. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values. RAC recommends the applicant to further assess in any review report the feasibility to collect the liquid wastes from washing the glassware and put it in practice if the outcome of the feasibility study is favourable. RAC adopted the final opinion by consensus with changes made to the draft opinion. 	
2. 147_CTPht_Bilbaina (1 use)	
Use 1: Use of CTPHT as a binder in the manufacture	SECR to send the final opinion to the EC,
of clay targets.	MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 30 October - 6 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. RAC concluded that alternative(s) presented by the applicant, taking into consideration the input of the third parties submitted in the public consultation, if implemented, would reduce the overall risks. The exposure of workers to CTPHT was estimated to be as described in section 2 of the justification to this opinion. The excess lifetime cancer risk for workers from exposure to CTPHT is estimated to be as described in section 3. Since CTPHT has PBT and vPvB properties, RAC does not support a quantitative risk assessment for the	

The use applied for may result in approximately 70-	
700 tonnes per year of emissions to the environment	
of PAHs with PBT, vPvB and carcinogenic properties.	
RAC was unable to propose additional authorisation	
conditions that could make the operational conditions	
and risk management measures appropriate and	
effective in limiting the risk for the environment and	
humans via the environment	
RAC adopted the final opinion by consensus with	
editorial changes made to the draft opinion.	
2 1/8 CTBbt DE7A (1 uso)	
3. 148_CIPIIL_DEZA (1 use)	
Use 1: Use of CTPht as a binder in the manufacture	SECR to send the final opinion to the EC,
of clay targets.	MSs and the Applicant.
	FF
The RAC consultations on the draft Final Oninion has	
here held 04 11 Neversher 2020	
been held 04-11 November 2020.	
RAC concluded that the operational conditions and	
risk management measures described in the	
application are not appropriate and effective in	
limiting the rick	
RAC concluded that alternative(s) presented by the	
applicant, taking into consideration the input of the	
third parties submitted in the public consultation, if	
implemented, would reduce the overall risks.	
The exposure of workers to CTPHT was estimated to	
the exposure of workers to CIFIII was estimated to	
be as described in section 2 of the justification to this	
opinion. The excess lifetime cancer risk for workers	
from exposure to CTPHT is estimated to be as	
described in section 3.	
Since CTPHT has PBT and vPvB properties RAC does	
not support a quantitative rick assessment for the	
not support a qualititative lisk assessment for the	
environment or for numans exposed via the	
environment.	
The use applied for may result in approximately 70-	
700 tonnes per year of emissions to the environment	
of PAHs with PBT, vPvB and carcinogenic properties.	
,	
RAC was unable to propose additional authorisation	
and there that equilations the example of the examp	
conditions that could make the operational conditions	
and risk management measures appropriate and	
effective in limiting the risk for the environment and	
humans via the environment.	
RAC adopted the final opinion by consensus with	
oditorial changes made to the draft eninion	
euronal changes made to the draft opinion.	

4. 149_CTPht_Nalon (1 use)	
Use 1: Use of CTPht for manufacture of formulations for various industrial uses	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in exposure and emissions over the authorisation period. This information should also be included in the review	
report The exposure to workers to CTPHT was estimated to be as described in section 2 of the justification to this opinion. The excess lifetime cancer risk for workers from exposure to CTPHT is estimated to be as described in section 3 of the justification to this opinion. Since CTPHT has PBT and vPvB properties, RAC does not support a quantitative risk assessment for the environment or for humans exposed via the environment. The use applied for may result in approximately 0.297 kg per year of emissions to the environment of indicator PAHs with PBT, vPvB and carcinogenic properties.	
 RAC agreed for: additional conditions for the authorisation RAC proposes as a condition for the authorisation that the applicant shall at the latest 3 years after the authorisation has been granted for this use implement further treatment of the exhaust air from the scrubbers by e.g. incineration or active carbon filters. 2. monitoring arrangements for the authorisation To improve the exposure assessment and facilitate further minimisation of the workers' exposure to CTPHT. RAC proposes that the 	

applicant shall implement at least annual programmes of inhalation exposure monitoring through personal sampling in combination with urinary biomonitoring, post-shift representative of the number of workers potentially exposed and the range of tasks undertaken where exposure to CTPHT is possible. This information from the monitoring programmes including the contextual information associated with each set of measurements and any action taken should also be included in the review report, if submitted.

RAC proposes for the authorisation that the applicant shall implement at least quarterly programmes of measurement of emissions of PAHs to air. This information should also be included in the review report, if submitted.

3. no recommendations for the review report

The applicant should revise the potential exposure assessment for the maintenance operations and provide а quantitative assessment. The applicant should act upon the outcome of this review without delay. The outcome of this action should be made available to the national authorities and documented in the review report, if submitted. The applicant should review the suitability of the personal protective equipment used to protect workers against dermal exposure to products containing CTPHT and should revise the dermal exposure assessment. The applicant should act upon the outcome of this review without delay. The outcome of this action should be documented in the review report, if submitted.

The applicant stated that the PAHconcentrations in the combined wastewater stream were measured at the release point at least once per year and monthly from September 2017 onwards. It is not fully clear whether this is a requirement in the environmental permit. RAC recommends to continue the monthly monitoring of the indicator PAHs in water. RAC recommends that the applicant includes the measurement data in any review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values.

The monitoring data referred to in section 8.1 of the justification to this opinion shall be included in the review report, if submitted. RAC adopted the final opinion by consensus with changes made to the draft opinion.	
5. 150_CTPht_AO_Koppers (1 use)	
Use 1: Use of CTPht for manufacture of formulations for various industrial uses Use of AO for manufacture of formulations for various industrial uses	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application for the use of Anthracene oil (AO) are appropriate and effective in limiting the risk, provided that they are adhered to.	
RAC concluded that the operational conditions and risk management measures described in the application for Pitch, coal tar, high temp. (CTPHT) are expected to be appropriate and effective in limiting the risk, provided that they are implemented and adhered to.	
The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in exposure and emissions over the authorisation period. This information should also be included in the review report.	
The exposure to workers to CTPHT was estimated to be as described in section 2 of the justification to this opinion. The excess lifetime cancer risk for workers from exposure to CTPHT is estimated to be as described in section 3 of the justification to this opinion.	
Since CTPHT and AO have PBT and vPvB properties, RAC does not support a quantitative risk assessment for the environment or for humans exposed via the environment.	
The use applied for may result in approximately 6.17 \times 10 ⁻³ kg per year of emissions to the environment of indicator PAHs with PBT, vPvB and carcinogenic properties.	

RAC agreed for:

- 1. no additional conditions for the authorisation
- 2. monitoring arrangements for the authorisation To improve the exposure assessment and facilitate further minimisation of the workers' exposure to CTPHT, RAC proposes that the applicant shall implement at least annual programmes of inhalation exposure monitoring through personal sampling in combination with post-shift urinary biomonitoring, representative of the number of workers potentially exposed and the range of tasks undertaken where exposure to CTPHT is possible. This information from the monitoring programmes including the contextual information associated with each set of measurements and any action taken should also be made available to Competent Authorities upon request and be included in the review report, if submitted.

RAC proposes for the authorisation that the applicant shall implement at least annual programmes of measurement of emissions of PAHs to air from the incinerator. This information should also be included in the review report, if submitted.

3. recommendations for the review report

The applicant should review the suitability of the personal protective equipment used to protect workers against dermal exposure to products containing CTPHT and should revise the dermal exposure assessment. The applicant should act upon the outcome of this review without delay. The outcome of this action should be made available to the national authorities and documented in the review report, if submitted.

The applicant notes that the concentrations of individual PAHs in the effluent of the active carbon filtered rainwater are measured at least once per month as required according to the environmental permit. RAC recommends that the applicant includes the measurement data in any review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values.

The monitoring data referred to in section 8.1 of the justification to this opinion shall be included in the review report, if submitted.

RAC adopted the final opinion by consensus with editorial changes made to the draft opinion.	
6. 153_CTPht_AO_Bilbaina (1 use)	
Use 1: Use of CTPht for manufacture of formulations for various industrial uses Use of AO for manufacture of formulations for various industrial uses The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	Rapporteurs together with SECR to do the final editing of the final opinion.SECR to send the final opinion to the EC, MSs and the Applicant.
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in exposure and emissions over the authorisation period. This information should also be included in the review report. The exposure to workers to CTPHT was estimated to be as described in section 2 of the justification to this opinion. The excess lifetime cancer risk for workers from exposure to CTPHT is estimated to be as described in section 3. Since CTPHT and AO have PBT and vPvB properties, RAC does not support a quantitative risk assessment for the environment or for humans exposed via the environment. The use applied for may result in approximately 0.8 kg per year of emissions to the environment of indicator PAHs with PBT, vPvB and carcinogenic properties.	
 RAC agreed for: additional conditions for the authorisation RAC proposes that as a condition for the authorisation the applicant shall implement state of the art technical RMMs following the hierarchy of control for the drum filling station and for the pump repair shop. monitoring arrangements for the authorisation To improve the exposure assessment and facilitate further minimisation of the workers' 	

exposure to CTPHT, RAC proposes that the applicant shall implement:

OPTION 1. annual programmes of inhalation monitoring exposure through personal sampling in combination with post-shift urinary biomonitoring, representative of the number of workers potentially exposed and the range of tasks undertaken where exposure to CTPHT is possible. This information from the monitoring programmes, including the contextual information associated with each set of measurements and any action taken, should be included in the review report, if submitted.

RAC proposes for the authorisation that the applicant shall implement at least quarterly monitoring of PAHs in the wastewater prior to release to the external STP. The results should be included in the review report, if submitted, including the details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values.

RAC proposes for the authorisation that the applicant shall implement at least annual programmes of measurement of emissions of PAHs to air. This information should also be included in the review report, if submitted.

3. recommendations for the review report

The applicant should review the suitability of the personal protective equipment used to protect workers against dermal exposure to products containing CTPHT and should revise the dermal exposure assessment. The applicant should act upon the outcome of this review without delay. The outcome of this action should be made available to the national authorities and documented in the review report, if submitted.

The monitoring data referred to in section 8.1 as well as a description of the risk management measures implemented in accordance with section 7.1 and their appropriateness and effectiveness, shall be included in the review report, if submitted.

The applicant shall revise the exposure scenario for the maintenance operations and include the update in the review report, if submitted.

RAC adopted the final opinion by consensus with changes made to the draft opinion as presented by the Rapporteurs.	
7. 162_OPE_LFB (1 use)	
Use 1: Use as virus inactivation into the manufacture process of plasma-derived immunoglobulins.	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 04-10 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational	
conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in emissions over the authorisation period. This information should also be included in the review report	
The use applied for may result in up to 10 kg per year emissions of the substance to the environment.	
RAC agreed for: 1. additional conditions for the authorisation As soon as the first measurements obtained through monitoring are available, the applicant shall carry out a mass balance analysis based on measurements as indicated in section 8 of the justification to the opinion. Based on the results, the applicant shall assess how the operational conditions and risk management measures (OCs and RMM) can be optimised in such a way that the releases of 4- tert-OPnEO to the environment can be further minimised taking into account the outcomes of the measurement programme. Such optimisation may include the collection of the waste streams following the ultrafiltration step and the cleaning-in-place step. The applicant shall act upon the outcome of this assessment	
 monitoring arrangements for the authorisation As soon as the new RMMs are operational, the applicant shall start undertaking a monitoring programme, measuring the concentration of 4- 	

tert-OPnEO in individual waste streams prior to release to the municipal STP. The initial sampling frequency should be sufficient to take account of daily fluctuations.

Once established, RAC recommends that the applicant should continue with the quarterly / four times per year monitoring of 4-tert-OPnEO and its principal degradation products in the waste water prior to release to the municipal STP using an analytical method capable of adequately characterising the substance and its degradation products in water and at an appropriately low level of detection. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values.

3. recommendations for the review report

As described in section 7 of the justification to the opinion, after implementation of the new RMMs, the applicant shall perform a new mass balance analysis in order to confirm the predicted effectiveness of the implemented RMMs and report the results in any review report, including details of the calculations carried out, the assumptions made, if any, and the corresponding environmental release values. Cleaning-in-place should be included in the mass balance analysis.

The results of the monitoring programme, as well as the mass balance and the outcome and conclusions of the actions taken with regards to minimising emissions, shall be documented and included in any subsequent authorisation review report.

The new mass balance analysis and measurement results should allow the evaluation of the effectiveness of the OCs and RMMs in place and to confirm that emissions are reduced to as low a level as is technically and practically possible.

The information gathered via the measurement programme as well as the outcome and conclusions of the review and any action taken, shall be included in any subsequent authorisation review report.

It was noted by RAC that there will be an excess solution of 4-tert-OPnEO per batch prepared and only parts of the solution will be

required for the virus inactivation step. The applicant is invited to further assess in a review report the feasibility for the batch quantity management.	
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion.	
8. 176_OPE_Abbott_1 (uses 1 and 2)	
Use 1: Industrial use as a surfactant in the formulation of In-Vitro Diagnostic Devices (IVDs) for clinical testing using ARCHITECT, Alinity and ABBOTT PRISM automated analyser systems.	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk.	
The proposed additional authorisation conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk.	
The use applied for may result in approximately 116.16 kg (from that 37.27 kg Sligo, 30.65 kg/year Longford, 48.24 kg/year in Wiesbaden) per year emission of 4-tert-OPnEO to the environment.	
RAC agreed for: 1. additional conditions for the authorisation Liquid waste	
All liquid waste releases containing the substance shall be collected for adequate treatment. The treatment shall minimise releases to environmental compartments as far as technically and practically possible. Release into the public sewer system is not considered	
 to be adequate treatment. 2. monitoring arrangements for the authorisation BAC recommends that the applicant should 	
monitor at least 4 times per year / quarterly 4- tert-OPnEO and its principal degradation	
the off-site WWTP using an analytical method capable of adequately characterising the substance and its principal degradation	
products in water at an appropriately low level	

of quantification. The results should be included in any review report, including details of sampling point, the analytical method, the concentrations detected and the corresponding environmental release values." 3. no recommendations for the review report. RAC adopted the final opinion by consensus with	
editorial changes made to the draft opinion.	
Use 2: Professional use as a surfactant in the final use of In-Vitro Diagnostic Devices (IVDs) for clinical testing using ARCHITECT, Alinity and ABBOTT PRISM automated analyser systems.	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk.	
The proposed additional authorisation conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk.	
Per year the use applied for may result in 4-tert- OPnEO emissions to the environment of approximately 514 kg in wastewater and 13 kg in solid waste. This amounts to a maximum average release of 27.6 g/day/site.	
 RAC agreed for: additional conditions for the authorisation All liquid and solid waste containing the substance shall be collected for adequate treatment. The treatment shall minimise releases to environmental compartments as far as technically and practically possible. Release into the sewer system or to surface waters is not adequate treatment. no monitoring arrangements for the authorisation recommendations for the review report. In case a review report is submitted, the applicant 	
shall report on a new representative survey of their downstream users about their efforts to collect all liquid waste for adequate treatment,	

and which treatment methods are applied (e.g., incineration).	
RAC adopted the final opinion by consensus with	
editorial changes made to the draft opinion.	
9. 184_OPE_Lilly (1 use)	
Use 1: Industrial formulation (dilution) of) of a silicone solution containing 4-(1,1,3,3-tetramethylbutyl)phenol ethoxylated and its	Rapporteurs together with SECR to do the final editing of the final opinion.
subsequent use as a lubricant in the manufacture of medicinal product delivery devices	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in	
limiting the risk to the environment. The proposed additional conditions for the	
authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The	
proposed monitoring arrangements for the authorisation are expected to provide information on	
the trends in emissions over the authorisation period. This information should also be included in the review	
The recommendations defined for the review report	
are expected to allow RAC to evaluate the review report efficiently.	
The use applied for may result in up to 29.6 kg and 10.3 kg per year emissions of the substance 4-tert-	
OPnEO to the environment at Fegersheim and Sesto	
riorentino site, respectively.	
RAC agreed for: 1. additional conditions for the authorisation	
All relevant wastewater containing 4-tert- OPnEO shall be collected and subject to	
adequate treatment with the view of	
both sites.	
After implementation of new OCs and RMMs, the applicants should perform a mass balance	
analysis in order to confirm the predicted	
the results in any review report. The validation	

	1
data should be available to the enforcement	
authorities upon request.	
2. monitoring arrangements for the authorisation	
lost quarterly/four times per year the	
concentration of 4-tert-OPnEO and its principal	
degradation products in the wastewater prior	
to release to the off-site STP using an analytical	
method capable of adequately characterising	
the parent substance and its principal	
degradation products in water at an	
appropriately low level of quantification.	
3. recommendations for the review report	
The information on the implemented OCs and	
RMMs, the mass balance and the results of the	
monitoring campaigns should be included in	
any review report, including details of sampling	
point, the analytical method, the	
concentrations detected and the corresponding	
environmental release values.	
PAC adopted the final opinion by concencus with	
changes made to the draft opinion	
10. 186 OPE NPE Beckman (uses 1 and	3)
10. 186_OPE_NPE_Beckman (uses 1 and	3)
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products	3) SECR to send the final opinion to the EC, MSs and the Applicant
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate	3) SECR to send the final opinion to the EC, MSs and the Applicant.
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory	3) SECR to send the final opinion to the EC, MSs and the Applicant.
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use.	3) SECR to send the final opinion to the EC, MSs and the Applicant.
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use.	3) SECR to send the final opinion to the EC, MSs and the Applicant.
10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the application are appropriate and the application are appropriate. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation no monitoring arrangements for the authorisation 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation no recommendations for the review report. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation no recommendations for the review report. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation no recommendations for the review report. RAC adopted the final opinion by consensus with 	3) SECR to send the final opinion to the EC, MSs and the Applicant.
 10. 186_OPE_NPE_Beckman (uses 1 and Use 1: Formulation of NPnEO and OPnEO solutions in European sites for use as laboratory products. Laboratory products are used as intermediate solutions for preparation of finished laboratory products (finished goods) or in-process use. The RAC consultations on the draft Final Opinion has been held 04-10 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The use applied for may result in zero kg per year emissions of the substance to the environment. RAC agreed for: no additional conditions for the authorisation no recommendations for the review report. RAC adopted the final opinion by consensus with changes made to the draft opinion. 	3) SECR to send the final opinion to the EC, MSs and the Applicant.

Use 3: Downstream use of OPnEO- or NPnEO- containing clinical laboratory products that require	Rapporteurs together with SECR to do the final editing of the final opinion.
registration, licensing, approval and monitoring by	
country-based health authorities, designed for use in	SECR to send the final opinion to the EC,
dedicated clinical chemistry, immunology,	MSs and the Applicant.
hematology and flow cytometry laboratory	
instruments and assays	
The RAC consultations on the draft Final Opinion has been held 04-10 November 2020.	
RAC concluded that the operational conditions and	
risk management measures described in the	
application are not appropriate and effective in	
limiting the risk. The proposed additional conditions	
for the authorisation are expected to result in	
operational conditions and risk management	
measures that are appropriate and effective in	
limiting the risk. This information should also be	
included in the review report.	
The use applied for may result in up to 305 kg 4-tert-	
OPnEO and 1 740 kg 4-NPnEO] per year emissions of	
the substance to the environment.	
RAC agreed for:	
1. additional conditions for the authorisation	
All solid waste containing of OPnEO and NPnEO	
shall be collected for adequate treatment. The	
treatment shall minimize releases to	
environmental compartments as far as	
technically and practically possible.	
The collection of contaminated liquid wastes for	
adequate treatment shall continue at the sites	
where it is already implemented.	
The applicant shall follow the reformulation	
strategy described in their comments to the	
2. no monitoring arrangements for the authorisation	
3. recommendations for the review report	
In case a review report is submitted, the	
applicant shall report on a new representative	
survey of their downstream users about their	
efforts to collect all solid waste for adequate	
treatment, and which treatment methods are	
applied.	
In case a review report is submitted, the	
applicant shall report on a new representative	
survey of their downstream users about their	
implemented system to collect liquid waste for	

adequate treatment, and which treatment methods are applied.	
RAC adopted the final opinion by consensus with changes made to the draft opinion.	
11. 187_OPE_AGC (2 uses)	
Use 1: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as detergent for the inactivation of viruses in the production of therapeutic proteins using mammalian cell hosts	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 09-13 November 2020.	
RAC concluded that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in emissions over the authorisation period. This information should also be included in the review report. The use applied for may result in approximately 0.00778 kg per year emissions of the substance to the environment.	
 RAC agreed for: 1. no additional conditions for the authorisation 2. monitoring arrangements for the authorisation As soon as the new RMMs are operational (collection of the second wash water), the applicants shall start undertaking a monitoring programme, measuring the concentration of 4-tert-OPnEO and its principal degradation products prior to release to the municipal STP. The initial sampling frequency should be sufficient to take account of daily fluctuations. Once established, RAC recommends that the applicants should continue with the quarterly monitoring of 4-tert-OPnEO and its principal degradation products in the waste water prior to release to the municipal STP using an analytical method capable of adequately characterising the substance and its principal degradation products in water and at an appropriately low level of detection. The results should be included in any subsequent review report, including details of the sampling point, 	

the analytical method, the concentrations	
detected and the corresponding environmental	
release values. A mass balance report should	
also be included when the use is increased	
and/or the new facility is operating	
2 recommendations for the review report	
5. recommendations for the review report	
RAC recommends that the applicants should,	
after implementation of the new RMMs	
(collection of the second wash water of the	
chromatographic column) and the results of	
the monitoring data, perform a new mass	
balance analysis in order to confirm the	
predicted effectiveness of the implemented	
RMMs in the current and future building. The	
information gathered via the measurement	
neormation gathered via the networks and	
program as well as the outcome and	
conclusions of the review and any action taken,	
shall be included in any subsequent	
authorisation review report.	
RAC recommends the applicants to further	
assess in any review report the feasibility of	
implementing an appropriate treatment of the	
residual waste water not collected and act on	
the outcome of the feasibility study.	
RAC adopted the final opinion by consensus with	
RAC adopted the final opinion by consensus with	
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion.	
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion.	SECD to cond the final opinion to the EC
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethory/lated as a detormate during the purification	SECR to send the final opinion to the EC,
 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification 	SECR to send the final opinion to the EC, MSs and the Applicant.
 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived 	SECR to send the final opinion to the EC, MSs and the Applicant.
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where	SECR to send the final opinion to the EC, MSs and the Applicant.
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities	SECR to send the final opinion to the EC, MSs and the Applicant.
 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) 	SECR to send the final opinion to the EC, MSs and the Applicant.
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 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) The RAC consultations on the draft Final Opinion has been held 09-13 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in 	SECR to send the final opinion to the EC, MSs and the Applicant.
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 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) The RAC consultations on the draft Final Opinion has been held 09-13 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to 	SECR to send the final opinion to the EC, MSs and the Applicant.
 RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) The RAC consultations on the draft Final Opinion has been held 09-13 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in provide information on the trends in emissions over 	SECR to send the final opinion to the EC, MSs and the Applicant.
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) The RAC consultations on the draft Final Opinion has been held 09-13 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result operational conditions for the authorisation and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in emissions over the authorisation period. This information should also	SECR to send the final opinion to the EC, MSs and the Applicant.
RAC adopted the final opinion by consensus with editorial changes made to the draft opinion. Use 2: Use of 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated as a detergent during the purification process of recombinant biopharmaceuticals derived from microbial expression hosts in projects where processes have been approved by ther authorities (GMP compliant) The RAC consultations on the draft Final Opinion has been held 09-13 November 2020. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to result in limiting the risk. The proposed monitoring arrangements for the authorisation are expected to provide information on the trends in emissions over the authorisation period. This information should also be included in the review report.	SECR to send the final opinion to the EC, MSs and the Applicant.

The use applied for may result in approximately 8.2 kg per year emissions of the substance to the environment.

RAC agreed for:

1. additional conditions for the authorisation

In the Heidelberg and Copenhagen sites, all liquid waste releases, which occur during the cleaning of premises (second wash of the chromatographic columns, clean in place rinse of the stainless steel tanks and centrifuge), shall be collected and disposed for adequate treatment.

The applicants shall, after implementation of the new RMMs and the results of the monitoring data, perform a new mass balance analysis in order to confirm the predicted effectiveness of the implemented RMMs in the current Heidelberg site and in the in the Copenhagen site. The new validation data should be available to the enforcement authorities upon request.

2. monitoring arrangements for the authorisation

In the current Heildelberg site, as soon as the new RMMs are operational (collection of the waste water from the rinse of the tanks/centrifuge and the second wash of the chromatographic column), the applicants shall start undertaking a monitoring programme, measuring the concentration of 4-tert-OPnEO and its principal degradation products prior to release to the municipal sewage treatment plant (STP).

In Copenhagen, the applicants shall start undertaking, after the production lines will become operational, a monitoring programme, measuring the concentration of 4-tert-OPnEO and its principal degradation products prior to release to the municipal STP.

In both sites the initial sampling frequency should be sufficient to take account of daily fluctuations.

Once established, RAC recommends that the applicants should continue with the quarterly monitoring of 4-tert-OPnEO and its principal degradation products in the waste water prior to release to the municipal STP using an analytical method capable of adequately characterising the substance and its degradation products in water and at an

 appropriately low level of detection. The results should be included in any subsequent review report, including details of the sampling point, the analytical method, the concentrations detected and the corresponding environmental release values. 3. recommendations for the review report The applicants are required to include a detailed description of the OCs and RMMs and the results of the monitoring data and mass balance analysis in any subsequent review report in order to corroborate the appropriateness and effectiveness of the RMMs and OCs in place in the increase use scenario in Heidelberg and in the in Copenhagen site. RAC recommends the applicants to further assess in any review report the feasibility of implementing an appropriate treatment of the residual waste water not collected and act on the outcome of the feasibility study. RAC recommends the applicants to further assess in any review report the feasibility of implementing an appropriate treatment of the residual waste water not collected and act on the outcome of the feasibility study. RAC adopted the final opinion by consensus with 	
editorial changes made to the draft opinion.	
12. 188_OPE_Wallac_2 (2 uses)	
Use 1: Formulation of 4-(1,1,3,3- tetramethylbutyl)phenol, ethoxylated (as Triton X- 100) for use in the assay buffer for the GSP® Neonatal GALT kit used for the semi-quantitative determination of galactose-1-phosphate uridyl transferase (GALT) activity	SECR to send the final opinion to the EC, MSs and the Applicant.
The RAC consultations on the draft Final Opinion has been held 04-10 November 2020.	
Therefore, RAC did not evaluate the potential risk of alternatives. RAC concluded that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk.	

The use applied for may result in approximately	
0.0006 kg per year of emissions of the substance to	
the environment.	
RAC agreed for:	
1 additional conditions for the putherication	
1. additional conditions for the authorisation	
All liquid waste releases which occur during QC	
control of IVD kits and R&D processes shall be	
collected and disposed of for adequate	
treatment. The treatment shall minimise	
releases to environmental compartments as far	
as technically and practically possible. Release	
into the sewer system or to surface waters is	
net adoquate treatment	
not adequate treatment.	
The applicant shall continue to monitor at least	
four times per year the concentration of 4-tert-	
OPnEO and its principal degradation products	
in the wastewater prior to release to the off-	
site WWTP, using an analytical method capable	
of adequately characterising the substance and	
its principal degradation products in water and	
at an appropriately low level of quantification	
The results should be included in any review	
report including details of compling point the	
report, including details of sampling point, the	
analytical method, the concentrations detected	
and the corresponding environmental release	
values.	
3. no recommendations for the review report	
RAC adopted the final opinion by consensus with	
editorial changes made to the draft opinion.	
Use 2: Use of 4-(1 1 3 3-Tetramethylbutyl) phenol	SECR to send the final opinion to the EC
ethoxylated (as Triton $Y_{-1}(0)$) in the assay buffer of	MSs and the Applicant
the CSP®Neenstal CALT kit used for the semi	
quantitative determination of galactose-1-phosphate	
uridyl transferase (GALT) activity.	
The RAC consultations on the draft Final Opinion has	
been held 04-10 November 2020.	
RAC concluded that the operational conditions and	
risk management measures described in the	
application are not appropriate and effective in	
limiting the rick. The prepaged additional conditions	
initially the risk. The proposed additional conditions	
for the authorisation are expected to result in	
operational conditions and risk management	
measures that are appropriate and effective in	
limiting the risk.	

The use applied for may result in approximately	T
0.135 kg per year of emissions of the substance to	
the environment for a total number of 7 sites	
RAC agreed for:	
1. additional conditions for the authorisation	
In addition to the solid waste containing traces	
of 4-tert-OPnEO generated from the use	
applied for, all liquid waste containing of 4-tert-	
OPnEO generated from the use applied for shall	
be collected by the downstream users for	
adequate treatment (e.g. incineration).	
The treatment shall minimise releases to	
environmental compartments as far as	
technically and practically possible. Release	
into the sewer system or to surface waters is	
not adequate treatment.	
2. no monitoring arrangements for the authorisation	
3. recommendations for the review report	
In case a review report is submitted, the	
applicant shall report on a new representative	
survey of their downstream users on the	
measures they have in place to collect for	
adequate treatment all liquid and solid waste	
containing 4-tert-OPnEO resulting from the use	
applied for and which treatment methods are	
applied for, and which treatment methods are	
PAC adapted the final opinion by concencus with	
editorial changes made to the draft eninion	
11. AOB	<u></u>
12. Minutes of RAC-55	
RAC adopted the final minutes by consensus at the	SECR to upload the table with Summary
plenary meeting.	Record of the Proceedings and Conclusions
	and Action points from RAC-55 to CIRCA
	BC.
	50.

Table 1: CLH opinions which were adopted at RAC-55B

1. C. I. Disperse Blue 124

- 2. Bentazone (ISO)
- 3.

Margosa, ext.

- 4. Perfluroheptanoic acid (PFHpA)
- 5. Bisphenol S
- 6. Melamine
- 7. Valifenalate
- 8. Isopyrazam

9. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2hydroxyethyl)ammonium salts (Penta-PSCA Na TEA)

- 10. 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA)
- 11. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA)
- 12. EGBE (Art 77-3c request)

Table 1

1. C. I. Disperse Blue 124

	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry					No c	urrent Annex VI ent	try				
Dossier submitters proposal	TBD	2-[N-ethyl-4-[(5- nitrothiazol-2-yl)azo]- m-toluidino]ethyl acetate; C.I. Disperse Blue 124	239- 203-6	15141- 18-1	Skin Sens. 1A	H317	GHS07 Wng	H317		Skin Sens. 1A; H317: C ≥ 0,001%	
RAC opinion	TBD	2-[N-ethyl-4-[(5- nitrothiazol-2-yl)azo]- m-toluidino]ethyl acetate; C.I. Disperse Blue 124	239- 203-6	15141- 18-1	Skin Sens. 1A	H317	GHS07 Wng	H317		Skin Sens. 1A; H317: C ≥ 0,001%	
Resulting Annex VI entry if agreed by COM	TBD	2-[N-ethyl-4-[(5- nitrothiazol-2-yl)azo]- m-toluidino]ethyl acetate; C.I. Disperse Blue 124	239- 203-6	15141- 18-1	Skin Sens. 1A	H317	GHS07 Wng	H317		Skin Sens. 1A; H317: C ≥ 0,001%	

2. Bentazone (ISO)

	Index No	Chemical name	EC No	C No CAS No	Classification		Labelling			Specific Conc.	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Limits, M- factors and ATE	
Current Annex VI entry	613-012- 00-1	bentazone (ISO); 3- isopropyl-2,1,3- benzothiadiazine-4- one-2,2-dioxide	246- 585-8	25057- 89-0	Acute Tox. 4* Eye Irrit. 2 Skin Sens. 1 Aquatic Chronic 3	H302 H319 H317 H412	GHS07 Wng	H302 H319 H317 H412			
Dossier submitters proposal	613-012- 00-1	bentazone (ISO); 3- isopropyl-2,1,3- benzothiadiazine-4- one-2,2-dioxide	246- 585-8	25057- 89-0	Retain Skin Sens. 1 Add Repr. 2 Modify Acute Tox. 4 Remove Aquatic Chronic 3	Retain H317 Add H361d Modify H302 Remove H412	Retain GHS07 Wng Add GHS08	Retain H317 Add H361d Modify H302 Remove H412		Add oral: ATE = 1640 mg/kg bw	
RAC opinion	613-012- 00-1	bentazone (ISO); 3- isopropyl-2,1,3- benzothiadiazine-4- one-2,2-dioxide	246- 585-8	25057- 89-0	Repr. 2 Acute Tox. 4 Skin Sens. 1	H361d H302 H317	GHS08 GHS07 Wng	H361d H302 H317		oral: ATE = 1600 mg/kg bw	
Resulting Annex VI entry if agreed by COM	613-012- 00-1	bentazone (ISO); 3- isopropyl-2,1,3- benzothiadiazine-4- one-2,2-dioxide	246- 585-8	25057- 89-0	Repr. 2 Acute Tox. 4 Eye Irrit. 2 Skin Sens. 1	H361d H302 H319 H317	GHS08 GHS07 Wng	H361d H302 H319 H317		oral: ATE = 1600 mg/kg bw	
	·							<u>.</u>			

3. Margosa, ext.

	Index No	Index No Chemical name EC N		CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry					No cu	rrent Annex VI entry					
Dossier submitters proposal	TBD	Margosa, ext. [from the kernels of <i>Azadirachta indica</i> extracted with water and further processed with organic solvents]	283-644- 7	84696-25-3	Repr. 2 Skin Sens. 1 Aquatic Chronic 1	H361d H317 H410	GHS08 GHS07 GHS09 Wng	H361d H317 H410		M = 10	
RAC opinion	TBD	Margosa, ext. [from the kernels of <i>Azadirachta indica</i> extracted with water and further processed with organic solvents]	283-644- 7	84696-25-3	Repr. 2 Skin Sens. 1 Aquatic Chronic 1	H361d H317 H410	GHS08 GHS07 GHS09 Wng	H361d H317 H410		M = 10	
Resulting Annex VI entry if agreed by COM	TBD	Margosa, ext. [from the kernels of <i>Azadirachta indica</i> extracted with water and further processed with organic solvents]	283-644- 7	84696-25-3	Repr. 2 Skin Sens. 1 Aquatic Chronic 1	H361d H317 H410	GHS08 GHS07 GHS09 Wng	H361d H317 H410		M = 10	

4. Perfluroheptanoic acid (PFHpA)

Index		Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes		
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE			
Current Annex VI entry	VI No current Annex VI entry												
Dossier submitters proposal	TBD	Perfluoroheptanoic acid; tridecafluoroheptanoic acid	206- 798-9	375-85-9	Repr. 1B STOT RE 1	H360D H372 (liver)	GHS08 Dgr	H360D H372 (liver)					
RAC opinion	TBD	Perfluoroheptanoic acid; tridecafluoroheptanoic acid	206- 798-9	375-85-9	Repr. 1B STOT RE 1	H360D H372 (liver)	GHS08 Dgr	H360D H372 (liver)					
Resulting Annex VI entry if agreed by COM	TBD	Perfluoroheptanoic acid; tridecafluoroheptanoic acid	206- 798-9	375-85-9	Repr. 1B STOT RE 1	H360D H372 (liver)	GHS08 Dgr	H360D H372 (liver)					

5. Bisphenol S

	Index No	Chemical name	EC No	No CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current											
Annex VI entry					No c	urrent Annex VI en	try				
Dossier submitters proposal	TBD	4,4'- sulphonyldiphenol; bisphenol S	201- 250-5	80-09-1	Repr. 1B	H360FD	GHS08 Dgr	H360FD			
RAC opinion	TBD	4,4'- sulphonyldiphenol; bisphenol S	201- 250-5	80-09-1	Repr. 1B	H360FD	GHS08 Dgr	H360FD			
Resulting Annex VI entry if agreed by COM	TBD	4,4'- sulphonyldiphenol; bisphenol S	201- 250-5	80-09-1	Repr. 1B	H360FD	GHS08 Dgr	H360FD			

6. Melamine

	Index No	Chemical name	EC No	lo CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry					No c	urrent Annex VI en	try				
Dossier submitters proposal	TBD	Melamine	203- 615-4	108-78-1	Carc. 2 STOT RE 1	H351 H372 (urinary tract)	GHS08 Dgr	H351 H372 (urinary tract)			
RAC opinion	TBD	Melamine	203- 615-4	108-78-1	Carc. 2 STOT RE 2	H351 H373 (urinary tract)	GHS08 Wng	H351 H373 (urinary tract)			
Resulting Annex VI entry if agreed by COM	TBD	Melamine	203- 615-4	108-78-1	Carc. 2 STOT RE 2	H351 H373 (urinary tract)	GHS08 Wng	H351 H373 (urinary tract)			

7. Valifenalate

	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current											
Annex VI					No c	current Annex VI en	try				
entry		I					1				
Dossier submitters proposal RAC opinion	TBD	methyl N- (isopropoxycarbonyl)- L-valyl-(3RS)-3-(4- chlorophenyl)-β- alaninate; valifenalate methyl N-		283159- 90-0 283159-	Aquatic Chronic 2	H411 H351	GHS09 GHS08	H411 H351			
	TBD	(Isopropoxycarbonyl)- L-valyl-(3RS)-3-(4- chlorophenyl)-β- alaninate; valifenalate		90-0	Aquatic Chronic 2	H411	GHS09 Wng	H411			
Resulting Annex VI entry if agreed by COM	TBD	methyl N- (isopropoxycarbonyl)- L-valyl-(3RS)-3-(4- chlorophenyl)-β- alaninate; valifenalate		283159- 90-0	Carc. 2 Aquatic Chronic 2	H351 H411	GHS08 GHS09 Wng	H351 H411			
8. Isopyrazam

	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry					No c	urrent Annex VI en	try				
Dossier submitters proposal	TBD	Reaction mass of 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9RS)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen- 5-yl]pyrazole-4- carboxamide and 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9SR)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen- 5-yl]pyrazole-4- carboxamide [≥78% syn isomers <15% anti isomers relative content]; isopyrazam		881685-58-1	Repr. 1B Skin Sens. 1B Aquatic Acute 1 Aquatic Chronic 1	H360D H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H360D H317 H410		M = 10 M = 10	
RAC opinion	TBD	Reaction mass of 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9RS)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen- 5-yl]pyrazole-4- carboxamide and 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9SR)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen-	-	881685-58-1	Carc. 2 Repr. 1B Skin Sens. 1B Aquatic Acute 1 Aquatic Chronic 1	H351 H360D H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H351 H360D H317 H410		Repr. 1B; H360D: C ≥ 3% M = 10 M = 10	

[Type here]

	5-yl]pyrazole-4- carboxamide [≥78% syn isomers ≤15% anti isomers relative content]; isopyrazam							
Resulting Annex VI entry if agreed by COM TBD	Reaction mass of 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9RS)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen- 5-yl]pyrazole-4- carboxamide and 3- (difluoromethyl)-1- methyl-N- [(1RS,4SR,9SR)- 1,2,3,4-tetrahydro-9- isopropyl-1,4- methanonaphthalen- 5-yl]pyrazole-4- carboxamide [≥78% syn isomers ≤15% anti isomers relative content]; isopyrazam	881685- 58-1	Carc. 2 Repr. 1B Skin Sens. 1B Aquatic Acute 1 Aquatic Chronic 1	H351 H360D H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H351 H360D H317 H410	Repr. 1B; H360D: C ≥ 3% M = 10 M = 10	

9. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta-PSCA Na TEA)

	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
				Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE		
Current Annex VI entry					No c	urrent Annex VI er	ntry				
Dossier submitters proposal	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid, sodium and tris(2- hydroxyethyl)ammoni um salts	701- 271-4	-	Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319			
RAC opinion	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid, sodium and tris(2- hydroxyethyl)ammoni um salts	701- 271-4		Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319			
Resulting Annex VI entry if agreed by COM	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid, sodium and tris(2- hydroxyethyl)ammoni um salts	701-271-4		Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319			

10. 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA)

	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry					No c	urrent Annex VI ent	ry				
Dossier submitters proposal	TBD	6-[(C10-C13)-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 118-1	2156592 -54-8	Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319		Repr. 1B; H360FD: C ≥ 0,03 %	
RAC opinion	TBD	6-[(C10-C13)-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 118-1	2156592 -54-8	Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319			
Resulting Annex VI entry if agreed by COM	TBD	6-[(C10-C13)-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 118-1	2156592 -54-8	Repr. 1B Eye Irrit. 2	H360FD H319	GHS08 GHS07 Dgr	H360FD H319			

11. 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA)

Classifica		beining in accordance	with the	CLF Kegu		12/2/2008				1	
	Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Conc. Limits, M- factors and ATE	
Current Annex VI entry				-	No c	urrent Annex VI ent	ry				
Dossier submitters proposal	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 162-1	-	Repr. 1B	H360FD	GHS08 Dgr	H360FD		Repr. 1B; H360FD: C ≥ 0,03 %	
RAC opinion	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 162-1	-	Repr. 1B	H360FD	GHS08 Dgr	H360FD			
Resulting Annex VI entry if agreed by COM	TBD	6-[C12-18-alkyl- (branched, unsaturated)-2,5- dioxopyrrolidin-1- yl]hexanoic acid	701- 162-1		Repr. 1B	H360FD	GHS08 Dgr	H360FD			

[Type here]

12. EGBE (Art 77-3c request)

	Index No	International	EC No	CAS No	Classification		Labelling			Specific Conc.	Notes
		Chemical Identification			Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Limits, M- factors and ATE	
First RAC opinion	603-014- 00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203- 905-0	111-76-2	Acute Tox. 3 Acute Tox. 4 Skin Irrit. 2 Eye Irrit. 2	H331 H302 H315 H319	GHS06 Dgr	H331 H302 H315 H319		inhalation: ATE =3 mg/L oral: ATE = 1200 mg/kgbw	
For RAC discussion following Art 77(3)c request	603-014- 00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203- 905-0	111-76-2	Acute Tox. 3	H331	GHS06 Dgr	H331		inhalation: ATE = 3 mg/L	
RAC opinion following Art 77(3)c request	603-014- 00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203- 905-0	111-76-2	Acute Tox. 3	H331	GHS06 Dgr	H331		inhalation: ATE = 3 mg/L	
Resulting Annex VI entry if agreed by COM	603-014- 00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203- 905-0	111-76-2	Acute Tox. 3 Acute Tox. 4 Skin Irrit. 2 Eye Irrit. 2	H331 H302 H315 H319	GHS06 Dgr	H331 H302 H315 H319		inhalation: ATE = 3 mg/L oral: ATE = 1200 mg/kg bw	

Part III. List of Attendees of the RAC-55 meeting

RAC Members	Neumann Michael
	Paris Pietro
Aquilina Gabriele	Peczkowska Beata
Barański Bogusław	Pribu Mihaela
Biró Anna	Printemps Nathalie
Bjørge Christine	Rodriguez Wendy
Borg Daniel	Rucki Marian
Branisteanu Radu (co-opted member)	Santonen Tiina
Carvalho João	Schlüter Urs
Chiurtu Elena (co-opted member)	Schulte Agnes
de la Flor Tejero Ignacio	Schuur Gerlienke
Doak Malcolm	Séba Julie
Docea Anca Oana	Sørensen Hammer Peter
Dobrev Ivan	Sogorb Miguel A.
Geoffroy Laure	Spetseris Nikolaos
Hakkert Betty	Stahlmann Ralf
Hartwig Andrea (co-opted member)	Tobiassen Lea Stine
Husa Stine	Tsitsimpikou Christina
Kadiķis Normunds	Užomeckas Žilvinas
Kapelari Sonja	Van der Haar Rudolf (co-opted member)
Karadjova Irina	Varnai Veda
Leinonen Riitta	Xanthos Theodore
Losert Annemarie	
Lund Bert-Ove	Apologies, Members
Martínek Michal	Brovkina Julija
Menard Srpčič Anja	Heederik Dick (co-opted member)
Moeller Ruth	Zeljezic Davor
Moldov Raili	
Murray Brendan	SEAC rapporteurs
	Fankhauser Simone (restriction: PFHxA)
	Kiiski Johanna (restriction: PFHxA, Art 77(3)c: PFOA)

Members' advisers

Boel Els (Julie Seba)

Catone Tiziana (Pietro Paris)

Clausen Henning (Peter Hammer Soerensen)

Esposito Dania (Pietro Paris)

Gabbert Silke (Betty Hakkert)

Henriksson Jörgen (Daniel Borg)

Hoffmann Frauke (Agnes Schulte)

Mahiout Selma (Tiina Santonen)

Martin Theresa (Ralf Stahlmann)

Munch Pernille (Lea Tobiassen)

Paludan Ditte Secher (Lea Tobiassen)

Partosch Falko (Ralf Stahlmann) Seba Julie (Wendy Rodriguez-Gonzalez)

Rother Dag (Urs Schlueter)

Romoli Debora (Pietro Paris)

Russo Maria Teresa (Pietro Paris)

Sonnenburg Anna (Ralf Stahlmann)

Suutari Tiina (Riitta Leinonen)

Viegas Susana (Joao Carvalho)

Invited experts

Facchin Manuel (Annemarie Losert)

Levy Patrick (OEL: cadmium)

Musu Tony (OEL: cadmium)

Saarikoski Sirkku (OEL: cadmium)

Dossier submitters

Affourtit Femke (NL)_bentazone

August Christina (DE)_PFHxA

Averbeck Frauke (DE)_PFHxA

Beausoleil Claire (FR)_divanadium pentaoxide

Charles Sandrine (FR)_V205

Drost Wiebke (DE)_PFHxA

Dubois Celine (FR)_single use nappies

Erdmann Christian (DE)_PFHxA

Fiore Karine (FR)_single use nappies

Henkler-Stephani Frank (DE)_PFHxA

Kacan Stefan (DE)_PFHxA

Mathieu-Huart Aurélie (FR)_single use nappies

Meys Catherine (BE)_Bisphenol S

Peiser Matthias (DE)_margosa

Schmeisser Sebastian (DE)_melamine

Regular stakeholder observers

Barry Frank (ETUC)

Comini Andrea (EuCheMS)

De Backer Liisi (CEFIC)

Duguy Hélène (ClientEarth)

Robinson Jan (A.I.S.E)

Romano Mozo Dolores (EEB)

Ruelens Paul (ECPA)

Van de Broeck Steve (CEFIC)

Verougstraete Violaine (Eurometaux)

Waeterschoot Hugo (Eurometaux)

Occasional stakeholders	
Barbu Luminita (EDANA)_Restriction : PFHxA, single use nappies, general restrictions	Kelsey Jeff (CEFIC/OSPA)_Art 77(3)c : EGBE
Cassart Michael (PlasticsEurope)_CLH : Bisphenol S	Kemeny Monika (ECPA/BASF)_CLH : bentazone
Leonhardt Thomas (EUROFEU)_Restriction: PFHxA, Art 77(3)c: PFOA	Krug Isabel (CEFIC/BASF)_CLH : bisphenol S
De Matos Olivier (ECETOC)_Art 77(3)c : EGBE	Lloyd Sara (ECPA/Syngenta)_CLH : isopyrazam
Niemelä Helena (CONCAWE)_Art (77)3 c : PFOA, DNEL trixylyl, OEL : cadmium	Lombaert Noömi (Eurometaux/ICdA)_OEL :cadmium
Robin Nicolas (PlasticsEurope)_ Restriction : PFHxA, Art 77(3)c : PFOA	Otter Rainer (ECETOC/BASF)_Art 77(3)c: EGBE
Scalia Mauro (Euratex)_Restriction : PFHxA, single use nappies, general restrictions	Pfau Wolfgang (ECPA/Trifolio)_CLH : margosa
	Thumm Stefan (Euratex/Bavarian Textile and Apparel Association)_Restriction : PFHxA, single-use nappies, general restrictions
Stakeholder experts	Wietor Jean-Luc (EEB/EEB)_Restriction : PFHxA, Art 77(3)c : PFOA
Battersby Rodgers (Eurometaux/EBRC consulting)_Art 77(3)c : lead	Yada Makiko (CEFIC/Daikin)_Restriction: PFHxA, Article 77(3)c: PFOA
Binks Steve (CEFIC/Downstream users of lead and compounds of the Pb Reach consortium)_Art 77(3)c : lead	
Bock Ronald (PlasticsEurope/Fluoropolymer)_Restri ction: PFHxA, Art 77(3)c PFOA	
Bomann Werner (ECPA/Belchim)_CLH : valifenalate	
Chowdhury Jasim (Eurometaux/ILA)_Art 77(3)c :lead	
da Cunha Vicente Golin (Eurometaux/REACH melamine consortium)_CLH : melamine	
Gelbke Heinz-Peter (CEFIC/PASG)_CLH : melamine	
Grant Claire (PlasticsEurope/Regulatory Science Associates) CLH : bisphenol S	
Hannebaum Peter (EUROFEU/Tyco Fire Protection Products)_Restriction :PFHxA, Article 77(3)c : PFOA	

ission
Peter (DG GROW)
Valentina (DG ENV)
Sylvain (DG ENV)
ico Ana Maria (DG GROW)
ez-Medina Miriam (DG GROW
eronika (DG GROW)
Carin (DG ENV)
ila Christophe (DG SANTE)
S Stylianos (DG GROW)
Alick (DG EMPL)
va Katarina (DG ENV)
ce Zinta (DG EMPL)
a Carla (DG EMPL)
n Gert (JRC)
lowski Jacek (DG GROW)
William (DG EMPL)
Patricia (DG SANTE)
Riccardo (DG GROW)
staff
Mark
r Tim, Chair
ert Fabrice
Simone
ler Michael
ison Sanna
inen Ari
Kalle
a Leila
en Marjo
a Silvia
ina

Part II. LIST OF ANNEXES

ANNEX I Final Agenda of the RAC-55 meeting

ANNEX II List of documents submitted to the Members of the Committee for Risk Assessment for the RAC-55 meeting

ANNEX III Declarations of conflicts of interest to the Agenda of the RAC-55 meeting



30 November 2020 RAC/A/55/2020 Final

Final Agenda

55th meeting of the Committee for Risk Assessment

30 November – 3 December and 7-10 December 2020

Virtual meeting

Monday 30 November starts at 14.00 Thursday 3 December breaks at 18.00 Monday 7 December resumes at 14.00 Thursday 10 December ends at 15.00

Times are Helsinki times

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC/A/55/2020 For adoption

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Appointment of (co-)rapporteurs

a) Appointment of (co-)rapporteurs for CLH dossiers, restriction dossiers, authorisation applications, evaluation of occupational exposure limits

For agreement

Item 5 – Report from other ECHA bodies and activities

a) RAC Work Plan for all processes

For information

Item 6 – Requests under Article 77(3)(c)

1) DNEL development for trixylyl phosphate

For discussion and adoption

- Revision of derogations from proposed restrictions on perfluorooctanoic acid (PFOA), its salts and PFOA-related substances; C9-C14 perfluorocarboxylic acids (C9-C14 PFCA), their salts and C9-C14 PFCA-related substances For discussion and adoption
- 3) Classification for acute inhalation toxicity of EGBE

For discussion and adoption

4) Classification for environmental toxicity of lead

For discussion

Item 7 –Health based exposure limits at the workplace

- a) Opinion development
 - 1) Cadmium and its inorganic compounds first draft opinion

For discussion and agreement

Item 8 – Harmonised classification and labelling (CLH)

8.1 CLH dossiers

A. Hazard classes for agreement without plenary debate (fast-track)

- C. I. Disperse Blue 124: skin sensitisation
- Bentazone (ISO): acute oral toxicity, skin sensitisation, acute aquatic hazards, chronic aquatic hazards
- Margosa ext.: physical hazards (explosives, flammable gases, flammable aerosols, oxidising gases, gases under pressure, flammable liquids, flammable solids, self-reactive substances and mixtures, pyrophoric liquids, pyrophoric solids, substances and mixtures which in contact with water emit flammable gases, oxidising liquids, oxidising solids, organic peroxides, substances and mixtures corrosive to metals), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, carcinogenicity, STOT SE, STOT RE, acute aquatic hazards, chronic aquatic hazards
- Benfluralin (ISO): physical hazards, acute aquatic hazards, chronic aquatic hazards
- Melamine: germ cell mutagenicity
- Valifenalate: physical hazards (explosives, flammable solids, self-heating substances, oxidising solids), acute toxicity via all routes, skin corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, STOT SE, STOT RE, chronic aquatic hazards, hazardous to the ozone layer

- Isopyrazam: physical hazards (explosive, flammable solid, self-reactive substance or mixture, pyrophoric solid, self-heating substance or mixture, substance which in contact with water emit flammable gases, oxidising solid, corrosive to metals), acute dermal and inhalation toxicity, skin

corrosion/irritation, serious eye damage/eye irritation, skin sensitisation, germ cell mutagenicity, STOT RE, acute aquatic hazards, chronic aquatic hazards

- 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta-PSCA Na-TEA): STOT RE

- 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1yl]hexanoic acid (Tetra-PSCA): STOT RE

- 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Penta-PSCA): STOT RE

For agreement

B. Hazard classes for agreement with plenary debate

- 1. Bentazone (ISO) (EC: 246-585-8; CAS: 25057-89-0)
- 2. Margosa ext. (EC: 283-644-7; CAS: 84696-25-3)
- 3. Perfluroheptanoic acid (PFHpA) (EC: 206-798-9; CAS: 375-85-9)
- 4. Bisphenol S (EC: 201-250-5; CAS: 80-09-1)
- 5. Melamine (EC: 203-615-4; CAS: 108-78-1)
- 6. Valifenalate (EC: -; CAS: 283159-90-0)
- 7. Isopyrazam (EC: -; CAS: 881685-58-1)

10) 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid, sodium and tris(2-hydroxyethyl)ammonium salts (Penta_PSCA Na TEA) (EC: -; CAS: -)

11) 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA) (EC: -; CAS: 2156592-54-8)

12) 6-[C12-18-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid

(Penta-PSCA) (EC: -; CAS: -)

13) Divanadium pentaoxide

For discussion and agreement

Item 9 – Restrictions

9.1 General restriction issues

a) Updated Framework for RAC and SEAC in checking conformity and developing opinions on restriction proposals

9.2 Restriction Annex XV dossiers

- a) Conformity check and key issues discussion
 - 1) Substances in single-use nappies

For discussion and agreement

- b) Opinion development
 - 1) Undecafluorohexanoic acid (PFHxA), its salts and related substances –third draft opinion

For discussion and provisional agreement

Item 10 – Authorisation

10.1 General authorisation issues

- a) Update on incoming/future applications
- b) Substitution Plans
- c) Report from RAC WG on AfAs during October 2020 meeting

RAC/55/2020/01 For information/discussion

10.2 Authorisation applications

1. Discussion on key issues

1) 9 applications for authorisation (EDC, Cr(VI), MOCA, 4-tert-OPnEO) from August 2020 submission window

For discussion

10.3 Agreement on draft opinions

A. Draft opinions for agreement without plenary debate (A-list)

- 1. 197_OPE_NPE_Phadia (2 uses)
- 2. 198_OPE_Zoetis (uses 1 and 2)
- 3. 199_OPE_Biokit (use 2)
- 4. 202_OPE_Merckle (1 use)

B. Draft opinions for agreement with plenary debate

- 1. 193_OPE_PPG (2 uses)
- 2. 196_OPE_Becton (1 use)
- 3. 198_OPE_Zoetis (uses 3 and 4)
- 4. 199_OPE_Biokit (use 1)
- 5. 203_OPE_NPE_Qiagen (4 uses)
- 6. 207_NPE_Chemetall (2 uses)
- 7. 208_RR1_TCE_BlueCube (1 use)
- 8. 209_CT_Safran (1 use)
- 9. 210_CT_SD_TataSteel (1 use)
- 10. 211_CT_Hubner (3 uses)

For discussion and agreement

10.4 Adoption on opinions

10.4.1.1 143_OPE_bioMerieux (use 1) 10.4.1.2 147_CTPht_Bilbaina (1 use) 10.4.1.3 148_CTPht_DEZA (1 use) 10.4.1.4 149_CTPht_Nalon (1 use) 10.4.1.5 150_CTPht_AO_Koppers (1 use) 10.4.1.6 153_CTPht_AO_Bilbaina (1 use) 10.4.1.7 162_OPE_LFB (1 use) 10.4.1.8 176_OPE_Abbott_1 (uses 1 and 2) 10.4.1.9 184_OPE_Lilly (1 use) 10.4.1.10 186_OPE_NPE_Beckman (uses 1 and 3) 10.4.1.11 187_OPE_AGC (2 uses) 10.4.1.12 188_OPE_Wallac_2 (2 uses)

For discussion and adoption

Item 11 – AOB

a) ECHA administrative improvement proposals

Item 12 – Minutes of RAC-55

a) Table with Summary Record of the Proceedings, and Conclusions and Action points from RAC-55

For adoption



Annex II (RAC 55)

Documents submitted to the Members of the Committee for Risk Assessment for the RAC 55 meeting.

Document number	Title
RAC/A/55/2020	Final Draft Agenda
RAC/55/2020/01	Report from RAC WG on AFAs during October 2020 meeting



Annex III (RAC-55)

The following participants, including those for whom the Chairman declared the interest on their behalf, declared potential conflicts of interest with the Agenda items (according to Art 9 (2) of RAC RoPs)

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for						
ALREADY DECLARED AT	ALREADY DECLARED AT PREVIOUS RAC PLENARY MEETING(S)							
Applications for Authorisation								
All chromates	Urs SCHLUTER	Institutional & personal involvement; asked to refrain from voting in the event of a vote on this group of substances - other mitigation measures may be applied by the Chairman.						
Restrictions								
<mark>NEW</mark> Diapers (FR)	Nathalie PRINTEMPS	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement						
	Agnes SCHULTE	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement.						
Perfluorohexanoic acid – PFHxA (DE)	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.						
	Ivan DOBREV	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement						
Harmonised classification	on & labelling							
Divanadium pentaoxide	Laure GEOFFROY	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this						

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
FR		substance - no other mitigation measures applied. No personal involvement.
	Nathalie PRINTEMPS	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.

NEW DOSSIERS				
Health based exposure limits at the workplace				
Cadmium and its inorganic compounds				
Harmonised classification & labelling				
Bentazone (ISO) NL	Betty HAKKERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.		
	Gerlienke SCHUUR	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.		
 Perfluroheptanoic acid (PFHpA) Bisphenol S 	Wendy RODRIGUEZ	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation		
		involvement.		
 C. I. Disperse Blue 124 Margosa ext. Melamine DE	Agnes SCHULTE	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on these substances - no other mitigation measures applied. Personal involvement in dossiers 1 and 3. No personal involvement in dossier 2.		
	Urs SCHLUTER	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.		
	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.		
	Ivan DOBREV	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation		

Dossier / DS	RAC Member	Reason for potential CoI / Working for	
NEW DOSSIERS			
		measures applied. Personal involvement.	
Valifenalate HU	Anna BIRO	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.	
1. Isopyrazam 2. Benfluralin (ISO)	Christine BJORGE	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.	
NO	Stine HUSA	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.	
1. Penta-PSCA Na TEA 2. Penta-PSCA 3. Tetra-PSCA AT	Annemarie LOSERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.	
Article 77.3(c)			
Classification for acute inhalation toxicity of EGBE	-	-	

Dossier / DS	RAC Member	Reason for potential CoI / Working for		
NEW DOSSIERS				
Classification for environmental toxicity of lead	-	-		