~~Confidential~~

Helsinki, 8 September 2022

Addressee
Registrant of JS_3007-53-2 as listed in Appendix 3 of this decision

Date of submission of the dossier subject to this decision
04/12/2020

Registered substance subject to this decision ("the Substance")
Substance name: N,N-dimethyldodecanamide
EC number: 221-117-5

Decision number: Please refer to the REACH-IT message which delivered this communication (in format CCH-D-XXXXXXXXXX-XX-XX/F)

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below, by the deadline of ***15 September 2025***.

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

Information required from all the Registrants subject to Annex VII of REACH

1. Skin sensitisation (Annex VII, Section 8.3.)

    i. in vitro/in chemico skin sensitisation information on molecular interactions with skin proteins (OECD TG 442C), inflammatory response in keratinocytes (OECD TG 442D) and activation of dendritic cells (EU B.71/OECD TG 442E)(Annex VII, Section 8.3.1.); and

    ii. Only if the in vitro/in chemico test methods specified under point 1.i. are not applicable for the Substance or the results obtained are not adequate for classification and risk assessment, in vivo skin sensitisation (Annex VII, Section 8.3.2.; test method: EU B.42./OECD TG 429);

2. In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.; test method: OECD TG 471, 2020)

3. Short-term toxicity testing on aquatic invertebrates (Annex VII, Section 9.1.1.; test method: EU C.2./OECD TG 202)

4. Growth inhibition study aquatic plants (Annex VII, Section 9.1.2.; test method: EU C.3./OECD TG 201)

5. Ready biodegradability (Annex VII, Section 9.2.1.1.; test method: EU C.4. C/D/E/F/OECD TG 301B/C/D/F or EU C.29./OECD TG 310)

Information required from all the Registrants subject to Annex VIII of REACH

6. In vitro cytogenicity study in mammalian cells (Annex VIII, Section 8.4.2.; test method: OECD TG 473) or In vitro micronucleus study (Annex VIII, Section 8.4.2.; test method: OECD TG 487)

7. If negative results are obtained in tests performed for the information requirement of Annex VII, Section 8.4.1. and Annex VIII, Section 8.4.2. then: In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method: OECD TG 476 or TG 490)

8. Screening for reproductive/developmental toxicity (Annex VIII, Section 8.7.1.; test method: EU B.63/OECD TG 421 or EU B.64/OECD TG 422) by oral route, in rats

9. Short-term toxicity testing on fish (Annex VIII, Section 9.1.3.; test method: EU C.1./OECD TG 203)

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

10. Sub-chronic toxicity study (90-day) (Annex IX, Section 8.6.2.; test method: OECD TG 408) by oral route, in rats

11. Pre-natal developmental toxicity study (Annex IX, Section 8.7.2.; test method: OECD TG 414) by oral route, in one species (rat or rabbit)

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

Information required depends on your tonnage band

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

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

How to comply with your information requirements

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

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

Appeal

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

Failure to comply

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

Authorised[1] under the authority of Mike Rasenberg, Director of Hazard Assessment

Appendix 1: Reasons for the decision
Appendix 2: Procedure
Appendix 3: Addressees of the decision and their individual information requirements
Appendix 4: Conducting and reporting new tests under REACH

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

Appendix 1: Reasons for the decision

Contents

0. Reasons common to several requests

0.1. Assessment of the read-across approach

1 You have adapted the following standard information requirements by using grouping and read-across approach under Annex XI, Section 1.5:

- Skin sensitisation (Annex VII, Section 8.3.)
- In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.)
- In vitro cytogenicity study in mammalian cells or in vitro micronucleus study (Annex VIII, Section 8.4.2.)
- In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.)
- Sub-chronic toxicity study (90-day), (Annex IX, Section 8.6.2.)
- Pre-natal developmental toxicity study (Annex IX, Section 8.7.2.)

2 ECHA has considered the scientific and regulatory validity of your read-across approach(es) in general before assessing the specific standard information requirements in the following sections.

3 Annex XI, Section 1.5. specifies two conditions which must be fulfilled whenever a read-across approach is used. Firstly, there needs to be structural similarity between substances which results in a likelihood that the substances have similar physicochemical, toxicological and ecotoxicological properties so that the substances may be considered as a group or category. Secondly, it is required that the relevant properties of a substance within the group may be predicted from data for reference substance(s) within the group.

4 Additional information on what is necessary when justifying a read-across approach can be found in the Guidance on IRs and CSA, Chapter R.6. and related documents (RAAF, 2017; RAAF UVCB, 2017).

0.1.1. Predictions for toxicological properties

5 As part of your comments to the draft decision, you have provided a read-across justification document in Section 13.2 of your updated registration dossier and as an annex to your comments.

6 In your comments to the draft decision, you explain that "[d]*ue to an upload error unfortunately the read across / analogue justification was not attached*".

7 You predict the properties of the Substance from information obtained from the following source substance(s):

- Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.
- N,N-dimethyldecan-1-amide, EC No. 238-405-1.
- N,N-dimethyloctanamide, EC No. 214-272-5.

8 You provide the following reasoning for the prediction of toxicological properties: "[...] *substances may be predicted as similar provided that their physicochemical, toxicological and ecotoxicological properties are likely to be similar or follow a regular pattern as a result of structural similarity* […]"

9 ECHA understands that your read-across hypothesis assumes that different compounds have the same type of effects. You predict the properties of your Substance based on a worst-case approach.

10 We have identified the following issues with the predictions of toxicological properties:

0.1.1.1. Missing supporting information

11 Annex XI, Section 1.5 of the REACH Regulation states that "*physicochemical properties, human health effects and environmental effects or environmental fate may be predicted from data for reference substance(s)*". For this purpose "*it is important to provide supporting information to strengthen the rationale for the read-across*" (Guidance on IRs and CSA R.6, Section R.6.2.2.1.f.). The set of supporting information should allow to verify the crucial aspects of the read-across hypothesis and establish that the properties of the Substance can be predicted from the data on the source substance(s).

12 Supporting information must include information to compare toxicokinetic properties of the category members and bridging studies to compare other properties of the category members.

13 As indicated above, your read-across hypothesis is based on the assumption that the structurally similar substances cause the same type of effect(s). In this context, relevant, reliable and adequate information allowing to compare the properties of the Substance and of the source substance(s) is necessary to confirm that both substances cause the same type of effects. Such information can be obtained, for example, from bridging studies of comparable design and duration for the Substance and of the source substance(s).

14 You have not provided a read-across justification document in IUCLID Section 13. However, you have provided some explanation of the proposed approach for the prediction of toxicological properties in the summary sections of your CSR and in the Section 7.1 of your technical dossier.

15 You argue on similar toxicokinetic properties for the group members. You make assumptions on the toxicokinetic characteristics of the Substance, based on its physicochemical properties, but do not provide experimental evidence with the Substance to support these assumptions. You have provided a study (1971) on "*twelve N-dimethylamides (Hallcomids)*", where a comparison is made between the impact of exposure route and chain length on LD50 in mice. However, you have not provided any comparative toxicokinetic information generated with the analogues.

16 You have provided bridging studies for skin corrosion/irritation and serious eye damage/eye irritation, using several source substances and the Substance. Apart from these studies which focus on local effects, you have provided no other bridging studies to compare the properties of the Substance and of the other members. In the absence of such information, you have not established that the Substance and the source substance(s) are likely to have similar properties. More specifically, this concerns the properties investigated by the following information requirements addressed in this decision:

- In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.)
- In vitro cytogenicity study in mammalian cells or in vitro micronucleus study (Annex VIII, Section 8.4.2.)
- In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.)
- Sub-chronic toxicity study (90-day), (Annex IX, Section 8.6.2.)
- Pre-natal developmental toxicity study (Annex IX, Section 8.7.2.)

17 Therefore, you have not provided sufficient supporting information to strengthen the rationale for the read-across.

18 As a part of your comments to the draft decision you have provided a read-across justification document. Within this document, you reiterate that the kinetic behavior of the target and source substances is comparable, specifically due to the similar physico-

chemical values and structures. However, you provide no new information to support your claim.

19 You state that you are "*discussing the possibility of conducting an OECD 422 and OECD 471*" to support your read-across adaptation.

0.1.1.2. Adequacy and reliability of source studies

20 According to Annex XI, Section 1.5., if the grouping concept is applied then in all cases the results to be read across must:

(1) be adequate for the purpose of classification and labelling and/or risk assessment;

(2) have adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3);

(3) cover an exposure duration comparable to or longer than the corresponding test method referred to in Article 13(3) if exposure duration is a relevant parameter.

21 Specific reasons why the studies on the source substances do not meet these criteria are explained further below under the applicable information requirement sections 1, 2, 6, 7, 8, 10 and 11. Therefore, no reliable predictions can be made for these information requirements.

22 In your comments to the draft decision you have provided further information on some studies which is addressed under the corresponding endpoints below.

0.1.2. Conclusion on the read-across approach

23 For the reasons above, you have not established that relevant properties of the Substance can be predicted from data on the source substance(s). Your read-across approach under Annex XI, Section 1.5. is rejected.

24 As described above, in your comments to the draft decision, as you have provided information that only partially addresses the issues raised above, your read-across approach under Annex XI, Section 1.5. remains rejected.

Reasons related to the information under Annex VII of REACH

1. Skin sensitisation

25 Skin sensitisation is an information requirement under Annex VII to REACH (Section 8.3.). Under Section 8.3., Column 1, the registrants must submit information allowing (1) A) a conclusion whether the substance is a skin sensitiser and B) whether it can be presumed to have the potential to produce significant sensitisation in humans (Cat. 1A), and (2) risk assessment, where required.

1.1. Information provided

26 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) Buhler test (1990) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.

1.2. Assessment of the information provided

27 We have assessed this information and identified the following issue(s):

1.2.1. Assessment whether the Substance causes skin sensitisation

1.2.1.1. Read-across adaptation rejected

28 As explained in Section 0.1, your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint specific issue(s) addressed below.

1.2.1.2. Non-compliant study

29 Under Annex XI, Section 1.5., the study to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3), in this case OECD TG 406. Therefore, the following specifications must be met:

- Positive control to establish the sensitivity and reliability of the experimental technique (OECD TG 406, paragraph 11)

30 The study is described as equivalent or similar to OECD 406. However, no information on a positive control group was provided.

In your comments, you state that the study "*was conducted in 1990 in accordance with Good Laboratory Practice standards (40 CFR)*" and that "*the original study report contains appendices showing Historical Positive Control Data*". You have provided this information as an annex to your comments. ECHA considers that the information you have provided addresses the above issue.

1.2.2. No assessment of potency

31 To be considered compliant and enable a conclusion in cases where the substance is considered to cause skin sensitisation, the information provided must also allow a conclusion whether it can be presumed to have the potential to produce significant sensitisation in humans (Cat. 1A).

32 As the currently available data does not allow to conclude whether the Substance causes skin sensitisation (see section 1.2.1. above), this condition cannot be assessed.

33 On this basis, the information requirement is not fulfilled.

34 In your comments to the draft decision, you have stated that "[…] *there is no doubt about the absence of skin sensitization based on the available data and therefore it does not matter if the test is able to discriminate between the potency categories Cat 1A or Cat 1B*". You have provided tabulated raw data (study nr [redacted]), concluding that the test substance was negative for skin sensitization and state that "*no questions on potency is open*". As indicated above, ECHA considers that the information you have provided addresses the above issue.

35 As the information provided in your comments to the draft decision only partially address the issues raised above (specifically the concern raised under 1.2.1.1.). You remain responsible for complying with this decision by the set deadline.

1.3. Specification of the study design

36 To fulfil the information requirement for the Substance, information on molecular interaction with skin proteins and/or inflammatory response in keratinocytes and/or activation of dendritic cells (OECD TG 442C and OECD TG 442D and EU B.71/OECD TG 442E) must be provided. Furthermore, an appropriate risk assessment is required if a classification of the Substance as a skin sensitiser (Cat 1A or 1B) is warranted.

37 In case no conclusion on the skin sensitisation potency can be made for the Substance based on the existing in vitro/in chemico data or newly generated in vitro/in chemico data, in vivo skin sensitisation study must be performed and the murine local lymph node assay (EU Method B.42/OECD TG 429) is considered as the appropriate study for the potency estimation.

2. In vitro gene mutation study in bacteria

38 An in vitro gene mutation study in bacteria is an information requirement under Annex VII to REACH (Section 8.4.1.).

2.1. Information provided

39 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) Ames study (1999) with N,N-dimethyldecan-1-amide, EC No. 238-405-1

(ii) Ames study (2009) with N,N-dimethyloctanamide, EC No. 214-272-5

2.2. Assessment of the information provided

2.2.1. Read-across adaptation rejected

40 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint specific issue(s) addressed below.

In your comments to the draft decision you state that "*read across useability is given as we can already see e.g. same cytotoxic behavior of this both substances which are both structurally close to the registered substance*." However, this statement does not address the specific issues identified above in Section 0.1. Therefore, the information provided in your comments does not change the assessment outcome.

2.2.2. Source study not adequate for the information requirement

41 Under Annex XI, Section 1.5., the study to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3), in this case OECD TG 471. Therefore, the following specifications must be met:

a) the maximum dose tested must induce a reduction in the number of revertant colonies per plate compared to the negative control, or the precipitation of the tested substance. If no precipitate or limiting cytotoxicity is observed, the highest test dose must correspond to 5 mg/plate or 5 µl/plate;

b) the number of revertant colonies per plate for the concurrent negative control must be inside the historical control range of the laboratory;

c) the mean number of revertant colonies per plate must be reported for the treated doses and the controls.

42 The studies are described as according to OECD 471. However, the following specifications are not according to the requirements of OECD TG 471:

a) The data from study (i) suggest that TA98 and TA102 (+S9) in experiment I and TA102 (+S9) in experiment II were not tested up to cytotoxic levels.

In your comments to the draft decision, you state that you "*have had a look into the report and raw data were it is stated that in a pre experiment showed strong toxic effect of the test item above 1000 µg/plate and pre experiment data is given"*. You have attached the results of the pre-experiment to as an annex to your comments. You state that you "*will enter the pre experiment data in an improved study record*".

The tabulated data in the comments on the draft decision indicate that TA98 (+S9) was tested up to cytotoxic levels. However, the information provided in your comments does not demonstrate that TA102 (+S9) was tested up to cytotoxic levels in experiments I and II.

b) There is no indication of a historical control range in study (i).

In your comments to the draft decision, you provided this information as part of your comments to the draft decision. The tabulated data in the comments on the draft decision indicate that the concurrent negative control sufficiently adheres to the historical control range. ECHA considers that the information you have provided addresses this specific issue. You should submit this information in an updated registration dossier.

c) data on the number of revertant colonies per plate for the treated doses and the controls were not provided for studies (i) and (ii).

In your comments to the draft decision, you provided this information as part of your comments to the draft decision. ECHA considers that the information you have provided addresses this specific issue. You should submit this information in an updated registration dossier.

43 Based on the above, the studies do not provide an adequate and reliable coverage of the key parameter(s) addressed by the OECD TG 471 and these studies are not an adequate basis for your read-across predictions.

44 On this basis, the information requirement is not fulfilled.

45 In your comments to the draft decision, you state that you are "*discussing the possibility of conducting an* […] *OECD 471 as a further proof of the read across*".

46 As the information provided in your comments to the draft decision only partially addresses the issues raised above. You remain responsible for complying with this decision by the set deadline.

2.3. Specification of the study design

47 To fulfil the information requirement for the Substance, the in vitro gene mutation study in bacteria (OECD TG 471, 2020) is considered suitable.

3. Short-term toxicity testing on aquatic invertebrates

48 Short-term toxicity testing on aquatic invertebrates is an information requirement under Annex VII to REACH (Section 9.1.1.).

3.1. Information provided

49 You have provided a study according to OECD TG 202 on the Substance (2015).

3.2. Assessment of the information provided

3.2.1. The provided study does not meet the information requirement

50 To fulfil the information requirement, a study must comply with OECD TG 202 and the requirements of OECD GD 23 if the substance is difficult to test (Article 13(3) of REACH). Therefore, the following specifications must be met:

51 Additional requirements applicable to difficult to test substances

a) for tests conducted under semi-static conditions, analysis of the highest and lowest test concentration and a concentration around the expected test endpoint (in this case, the EC50) at the beginning of the test, at the end of the first (or longest) renewal cycle (before and after renewal of test solutions), and at the end of the test must be conducted.

52 Your registration dossier provides an OECD TG 202 showing the following:

53 Additional requirements applicable to difficult to test substances

a) as explained further below, the substance is considered difficult to test. However, on the analytical verification of exposure, you state that sampling was conducted only at "*the start of the exposure (0 h) samples from vessels without daphnids and at the end of the exposure (48 h) samples from vessels with daphnids*". You have not indicated that analysis of test concentrations were conducted at the end of the first renewal cycle (before and after renewal of test solutions) as required by the OECD GD 23.

   In your comments to the draft decision, you acknowledge that this requirement was not met. You specify that the "*test concentration measured at test end were between 87-100% of the nominal concentrations*". You consider that "[t]*his indicates that the substance concentrations were maintained at an acceptable level (i.e. ≥80% of nominal concentrations) throughout the exposure period*".

54 Based on the above,

- the Substance is difficult to test due to the fairly low water solubility (28 mg/L) and adsorptive properties (log Kow of 5.2 based on OECD TG 117) and there are critical methodological deficiencies resulting in the rejection of the study results. More specifically, the minimum requirement in terms of sampling frequency for the analysis of test concentrations as specified in OECD GD 23 is not met. Therefore, taking into account the properties of the substance which may lead to difficulties in maintaining stable exposure concentrations, the analysis of test concentration at

the start of the first renewal phase and the end of the second renewal phase does not provide a valid basis to demonstrate that exposure was satisfactorily maintained during the test.
In your comments on the draft decision, you consider that the fact that measured values were close to nominal values at test end is sufficient to demonstrate that exposure was satisfactorily maintained throughout the exposure phase. However, this information does not provide any objective mean to demonstrate that exposure levels were maintained in the first exposure phase (0-24h). Also, in the absence of measure concentrations at the start of the second exposure phase, it does not provide a proof that exposure concentrations was stable in the second exposure phase (24-48h);

55 Therefore, the requirements of OECD TG 202 in combination with OECD GD 23 are not met.

56 On this basis, the information requirement is not fulfilled.

3.3. Study design and test specifications

57 The Substance is difficult to test due to the fairly low water solubility (28 mg/L) and adsorptive properties (log Kow of 5.2 based on OECD TG 117). OECD TG 202 specifies that, for difficult to test substances, you must consider the approach described in OECD GD 23 or other approaches, if more appropriate for your substance. In all cases, the approach selected must be justified and documented. Due to the properties of Substance, it may be difficult to achieve and maintain the desired exposure concentrations. Therefore, you must monitor the test concentration(s) of the Substance throughout the exposure duration and report the results. If it is not possible to demonstrate the stability of exposure concentrations (i.e. measured concentration(s) not within 80-120% of the nominal concentration(s)), you must express the effect concentration based on measured values as described in OECD TG 202. In case a dose-response relationship cannot be established (no observed effects), you must demonstrate that the approach used to prepare test solutions was adequate to maximise the concentration of the Substance in the test solution.

4. Growth inhibition study aquatic plants

58 Growth inhibition study on aquatic plants is an information requirement under Annex VII to REACH (Section 9.1.2.).

4.1. Information provided

59 You have provided a study according to OECD TG 201 on the Substance (2015).

4.2. Assessment of the information provided

4.2.1. The provided study does not meet the information requirement

60 To fulfil the information requirement, a study must comply with OECD TG 201 and the requirements of OECD GD 23 if the substance is difficult to test (Article 13(3) of REACH). Therefore, the following specifications must be met:

61 Reporting of the methodology and results

a) the results of algal biomass determined in each flask at least daily during the test period are reported in a tabular form;

b) adequate information on the analysis of exposure concentrations (e.g., sampling

schedule, whether samples inoculated with algae were analysed) and on the results of the analytical determination of exposure concentrations is provided.

62 Your registration dossier provides an OECD TG 201 showing the following:

63 Reporting of the methodology and results

a) tabulated data on the algal biomass determined daily for each treatment group and control are not reported;

b) on the analysis of test concentrations, you have provided no information on sampling frequency and on whether the samples used for analysis were treated identically to those used for testing (i.e., inoculated with algae and incubated under identical conditions). Further, you only reported mean measured concentrations but no tabular data on individual measurements.

64 Based on the above, the reporting of the study in your registration dossier is not sufficient to conduct an independent assessment of its reliability. More specifically,

- in the absence of tabulated data on the algal biomass determined during the test, ECHA cannot verify whether the validity criteria of the test guideline were met and whether the interpretation of the study results is adequate.
- in the absence of adequate on the analytical verification of exposure concentrations, it is not possible to verify that the specifications of the test guideline were met. In particular the OECD TG 201 states that, as a minimum requirement, the concentrations of the test material are measured at least at the beginning and end of the test at the highest, and at the lowest test concentration , and at a concentration around the expected EC50. Further, for strongly adsorbing test substances, additional samplings for analysis at 24-hour intervals is required unless it can be demonstrated that exposure was satisfactorily maintained until the end of the test. The guidance also requires that test media prepared specifically for analysis of exposure concentrations during the test is treated identically to those used for testing (i.e., inoculated with algae and incubated under identical conditions). You have not provided adequate information to verify that the above conditions were met and you also have not provided adequate reporting of measured test concentrations. Therefore, ECHA cannot make an independent assessment to whether exposure concentrations were satisfactorily maintained during the test.

65 Therefore, the requirements of OECD TG 201 in combination with OECD GD 23 are not met.

66 On this basis, the information requirement is not fulfilled.

67 In your comments to the draft decision, you provided the missing information listed above. From that information, it can be confirmed that the validity criteria of the test guideline were met. In addition, you provided adequate information to confirm that exposure was satisfactorily maintained. The information provided as part of your comments addresses the incompliances identified above. However, as the information is currently not available in your registration dossier, the data gap remains. You should submit this information in an updated registration dossier by the deadline set in the decision.

4.3. Study design and test specifications

68 OECD TG 201 specifies that, for difficult to test substances, OECD GD 23 must be followed. As already explained above, the Substance is difficult to test. Therefore, you must fulfil the requirements described in ‘Study design’ under Appendix 1.3.

5. Ready biodegradability

69 Ready biodegradability is an information requirement in Annex VII to REACH (Section 9.2.1.1.).

5.1. Information provided

70 You have provided an OECD TG 301B study on the Substance (2015)

5.2. Assessment of information provided

5.2.1. The provided study does not meet the information requirement

71 To fulfil the information requirement, a study must comply with the OECD TG 301 or 310 (Article 13(3) of REACH). Therefore, for a study according to OECD TG 301, the following requirements must be met:

72 Reporting of the methodology and results

a) the test material used to conduct the study is adequately described (including information on purity and the presence of impurities)
b) the inoculum concentration in the test is adequately reported to verify that the specifications of OECD TG 301B are met;
c) the results of measurements at each sampling point in each replicate is reported in a tabular form;
d) the inorganic carbon content (IC) and total carbon content (TC) of the test material suspension in the mineral medium at the beginning of the test is reported.

73 Your registration dossier provides an OECD TG 301B showing the following:

74 Reporting of the methodology and results

a) you describe the test material as N,N-dimethyldodecanamide with EC 221-117-5. However, you have provided no information on purity and presence of impurities;
b) the concentration of the inoculum is not described. You have not provided information suspended solid concentration and on cell density (in cells/mL) in the test bottles as required by the test guideline;
c) the results of measurements at each sampling point in each replicate are not reported;
d) the inorganic carbon content (IC) and total carbon content (TC) of the test material suspension in the mineral medium at the beginning of the test are not reported.

75 Based on the above, the reporting of the study in your registration dossier is not sufficient to conduct an independent assessment of its reliability. More specifically,

- as you have not provided adequate information on the test material identity, it is possible to verify that it corresponds to the registered substance.
- as you have not provided any reporting of the inoculum density in the test, it is not possible to verify that the inoculum density met the specification of OECD TG 301B (i.e., suspended solid concentration < 30 mg/L and cell density < 10^7 to 10^8 cells/L in the test vessel);
- as you have not provided adequate reporting of the study results, it is not possible to conduct an independent assessment of whether the validity criteria of the test guideline were met.

76 Therefore, the requirements of OECD 301B are not met.

77 On this basis, the information requirement is not fulfilled.

78 In your comments to the draft decision, you provided the missing information listed above. More specifically,

- you clarified that the test material was "[redacted]% N,N-Dimethyldodecane-1-amide, [redacted]% Dodecanoic acid (lauric acid)"
- you clarified that the inoculum density was 30 mg/L of suspended solids;
- you provided adequate information on raw measurements to verify that the validity criteria of the test guideline were met and that the interpretation of the results were correct;

79 The information provided as part of your comments addresses most of the incompliances identified above. ECHA notes that you have not provided an estimate of the incolum concentration based on cells/mL. But considering that the pass level for ready biodegradability was reached early during the experimental phase (i.e., less than 10 days) and that degradation reached 82.3 to 90.6% by the end of the test, this deficiency is considered of secondary importance.

80 However, as all the information from your comments on the draft decision is currently not available in your registration dossier (in particular the raw measurements), the data gap remains. You should submit this information in an updated registration dossier by the deadline set in the decision.

Reasons related to the information under Annex VIII of REACH

6. In vitro cytogenicity study in mammalian cells or In vitro micronucleus study

81 An in vitro cytogenicity study in mammalian cells or an in vitro micro-nucleus study is an information requirement under Annex VIII to REACH (Section 8.4.2.).

6.1. Information provided

82 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) *in vitro* chromosome aberration study (1995) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.

6.2. Assessment of the information provided

6.2.1. Read-across adaptation rejected

83 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint specific issue(s) addressed below.

6.2.2. Source study not adequate for the information requirement

84 Under Annex XI, Section 1.5., the study to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3), in this case OECD TG 473. Therefore, the following specifications must be met:

a) At least 300 well-spread metaphases must be scored per concentration.;
b) Data on the cytotoxicity and the frequency of cells with structural chromosomal aberration(s) for the treated and control cultures must be reported;

85 The study submitted in your dossier is described as according to OECD TG 473. However, the following specifications are not according to the requirements of OECD TG 473:

a) the scoring of at least 300 metaphases per concentration

In your comments to the draft decision, you state that the study "*was conducted in 1995 according to the actual guidelines within the year*". You acknowledge that "*compared to today performed studies there is a lower number of metaphases count*". However, you consider the lower statistical power of this study is a minor deviation as "[t]*he study shows metaphase with aberrations in the range of the solvent control, there is only one slight increase at the top dose of the test item for metaphase excl. gaps. But looking at the historical solvent controls this value does also not exceed the max. value. In sum the result of the study is strong negative and an increase in counting the metaphases will not change this result to our assumption*".

ECHA considers that the information you have provided addresses this specific issue. You should submit this information in an updated registration dossier.

b) data on the cytotoxicity and/or the frequency of cells with structural chromosomal aberration(s) for the treated and control cultures.

In your comments to the draft decision, you provided this information as part of your comments to the draft decision. ECHA considers that the information you have provided addresses this specific issue. However, the tabulated data you have provided suggest that the test substance was not tested at sufficiently high concentrations. The current OECD TG 473 states "*If the maximum concentration is based on cytotoxicity, the highest concentration should aim to achieve 55 ± 5% cytotoxicity using the recommended cytotoxicity parameters*". ECHA understands that no such cytotoxicity was reached in the experiment with harvest time 24h and 30h without metabolic activation, and 8h, 24h and 30h with metabolic activation.

86 Based on the above, the study does not provide reliable coverage of the key parameter(s) addressed by the OECD TG 473 and this study is not an adequate basis for your read-across predictions.

87 On this basis, the information requirement is not fulfilled.

88 As the information provided in your comments to the draft decision only partially addresses the issues raised above. You remain responsible for complying with this decision by the set deadline.

6.3. Specification of the study design

89 To fulfil the information requirement for the Substance, either *in vitro* cytogenicity study in mammalian cells (Annex VIII, Section 8.4.2., test method OECD TG 473) or *in vitro* micronucleus study (Annex VIII, Section 8.4.2., test method OECD TG 487) are considered suitable.

7. In vitro gene mutation study in mammalian cells

90 An in vitro gene mutation study in mammalian cells is an information requirement under Annex VIII to REACH (Section 8.4.3.) in case of a negative result in the in vitro gene mutation test in bacteria and the in vitro cytogenicity test.

7.1. Triggering of in vitro gene mutation study in mammalian cells

91 The present decision requests an in vitro gene mutation study in bacteria and an in vitro cytogenicity study in mammalian cells (see Appendices 1.2 and 1.6). The result of these tests will determine whether the present requirement for an in vitro mammalian cell gene mutation study in accordance with Annex VIII, Section 8.4.3 is triggered.

92 Consequently, you are required to submit an in vitro mammalian cell gene mutation study, if the in vitro gene mutation study in bacteria / the in vitro cytogenicity study in mammalian cells or an in vitro micronucleus study provide a negative result.

7.2. Information provided

93 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) *in vitro* gene mutation study in mammalian cells (1994) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.

7.3. Assessment of the information provided

7.3.1. Read-across adaptation rejected

94 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint specific issue(s) addressed below.

7.3.2. Source study not adequate for the information requirement

95 Under Annex XI, Section 1.5., the study to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3), in this case OECD TG 476. Therefore, the following specifications must be met:

a) the maximum concentration tested must induce 80-90% of cytotoxicity compared to the negative control, or the precipitation of the tested substance. If no precipitate or limiting cytotoxicity is observed, the highest test concentration must correspond to 10 mM, 2 mg/mL or 2 µl/mL, whichever is the lowest;

b) data on the cytotoxicity and the mutation frequency for the treated and control cultures must be reported.

96 The study is described as according to OECD TG 476. However, the following specifications are not according to the requirements of OECD TG 476:

a) You claim that cytotoxicity was observed in the submitted study, but you do not clarify whether this was 80-90% as compared to the negative control;

b) data on the cytotoxicity and the mutation frequency for the treated and control cultures is not reported.

In your comments to the draft decision on point a) and b) above, you explain that "[w]*ithin the study report conal toxicity was checked it could be observed that no clonation was possible at concentration of 250 µg/ml or above (cytotoxicity 100%). Therefore main experiment was starting using a top dose between 250 and 200µg/ml which was in-between of the total cytotoxic (250µg/ml) and the non cytotoxic level (125 µg/ml). Main Experiment showed afterwards always cytotoxicity at the chosen top dose level in each experiment with variable survival rates. None of the experiments did show a statistical significant increase in mutant frequency compared to (historical) controls*". You explain that you intend to add "*raw data containing also pre experiment data as well as historical control information*" in an updated robust study summary.

ECHA considers that the information you have provided in your comments addresses issues (a) and (b) raised above. You should submit this information in an updated registration dossier.

97 As the information provided in your comments to the draft decision only partially addresses the issues raised above. You remain responsible for complying with this decision by the set deadline.

7.4. Specification of the study design

98 To fulfil the information requirement for the Substance, either the in vitro mammalian cell gene mutation tests using the hprt and xprt genes (OECD TG 476) or the thymidine kinase gene (OECD TG 490) are considered suitable.

8. Screening for reproductive/developmental toxicity

99 A screening for reproductive/developmental toxicity study (OECD 421 or OECD 422) is an information requirement under Annex VIII to REACH (Section 8.7.1.), if there is no

evidence from analogue substances, QSAR or in vitro methods that the substance may be a developmental toxicant.

8.1. Triggering of a screening for reproductive/developmental toxicity study

100 Under Section 8.7., Column 2 of Annex VIII to REACH, the study does not need to be conducted if a pre-natal developmental toxicity study (OECD TG 414) is already available.

101 In your dossier you have provided following information:

(i) pre-natal developmental toxicity study (1991) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2

(ii) a statement that a reproductive screening study does not need to be conducted as results from a "*developmental toxicity study and a subchronic toxicity study*" did not reveal any adverse effects regarding developmental or fertility.

102 However, for the reasons explained in section 0.1, this pre-natal developmental toxicity study is considered incompliant. Consequently, a screening for reproductive/developmental toxicity study must be submitted.

103 In your comments to the draft decision you have provided information that only partially addresses the concern raised under '0.1. Assessment of the read-across approach'. You remain responsible for complying with this decision by the set deadline.

104 In your comments to the draft decision, you also state that you are "*discussing the possibility of conducting an OECD 422* […] *as a further proof of the read across*".

8.2. Specification of the study design

105 A study according to the test method EU B.63/OECD TG 421 or EU B.64/OECD TG 422 must be performed in rats.

106 The study must be conducted with oral administration of the Substance (Guidance on IRs and CSA, Section R.7.6.2.3.2.).

9. Short-term toxicity testing on fish

107 Short-term toxicity testing on fish is an information requirement under Annex VIII to REACH (Section 9.1.3.).

9.1. Information provided

108 You have provided a study according to OECD TG 203 on the Substance (2015).

9.2. Assessment of the information provided

9.2.1. The provided study does not meet the information requirement

109 To fulfil the information requirement, a study must comply with OECD TG 203 and the requirements of OECD GD 23 if the substance is difficult to test (Article 13(3) of REACH). Therefore, the following specifications must be met:

110 Additional requirements applicable to difficult to test substances

a) a continuous flow through exposure system is used if exposure concentrations cannot be maintained within 80-120% of nominal in a semi-static exposure system with a renewal frequency of 24 hours;

b) for tests conducted under semi-static conditions, analysis of the highest and lowest test concentration and a concentration around the expected test endpoint (in this case, the EC50) at the beginning of the test, at the end of the first (or longest) renewal cycle (before and after renewal of test solutions), and at the end of the test must be conducted;

111 Reporting of the methodology and results

c) adequate information on the results of the analytical determination of exposure concentrations is provided.

112 Your registration dossier provides an OECD TG 203 showing the following:

113 Additional requirements applicable to difficult to test substances

a) the test was conducted under semi-static conditions with a renewal rate of 48 hours. You state that "*the concentrations declined over the 48-h renewal interval to undetectable levels*";

b) as explained further below, the substance is considered difficult to test. You have not provided an unambiguous description of the sampling schedule for the analytical verification of exposure. In particular, you have not specified if test concentrations were measured for both test medium renewals;

114 Reporting of the methodology and results

c) on the analysis of test concentrations, you have only reported mean measured concentrations but no tabular data on individual measurements.

115 Based on the above, the Substance is difficult to test due to the fairly low water solubility (28 mg/L) and adsorptive properties (log Kow of 5.2 based on OECD TG 117) and there are critical methodological deficiencies resulting in the rejection of the study results. More specifically,

- the selected test design (semi-static conditions with 24 hours renewal) did not allow an appropriate exposure to the test substance. ECHA notes that the test concentrations were below the limit of quantifications of the analytical method at the end of the renewal phases. For substances subject to rapid loss from the test medium, OECD GD 23 specifies that a renewal rate of 24 hours should be used. Further, a continuous flow through exposure system must be used if exposure concentrations cannot be maintained within 80-120% of nominal in a semi-static exposure system with a renewal frequency of 24 hours.
- It is unclear if the minimum requirements in terms of sampling frequency for the analysis of test concentrations as specified in OECD GD 23 were met.

116 Further, the reporting of the study is not sufficient to conduct an independent assessment of its reliability. More specifically, you have not provided adequate reporting of measured test concentrations. Therefore, ECHA cannot make an independent assessment of the exposure to the test material during the study.

117 Therefore, the requirements of OECD TG 203 in combination with OECD GD 23 are not met.

118 On this basis, the information requirement is not fulfilled.

119 In your comments to the draft decision, you "*agree that the validity criterion that test concentrations should be within ±20% of nominal or mean of analytically determined concentrations throughout the test period was not met*". You state that "*As requested in*

the Decision on testing proposal […] *from 21 May 2021, the registrant scheduled a longterm fish study according to OECD 210 in order to fulfill the information requirement according to Annex IX. Referring to Annex VIII, Section 9.1.3, which states that a study on short-term toxicity on fish does not need to be conducted if long-term aquatic toxicity study on fish is already available.*

120 As this strategy relies on on data which is yet to be generated for the proposed, no conclusion on the compliance of the proposed adaptation can be made. You remain responsible for complying with this decision by the set deadline.

9.3. Study design and test specifications

121 OECD TG 203 specifies that, for difficult to test substances, OECD GD 23 must be followed. As already explained above, the Substance is difficult to test. Therefore, you must fulfil the requirements described in 'Study design' under Request 1.4.

Reasons related to the information under Annex IX of REACH

10. Sub-chronic toxicity study (90-day)

122 A sub-chronic toxicity study (90 day) is an information requirement under Annex IX to REACH (Section 8.6.2.).

10.1. Information provided

123 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) sub-chronic toxicity study (90 day) (2000) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.

10.2. Assessment of the information provided

10.2.1. Read-across adaptation rejected

124 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected.

125 On this basis, the information requirement is not fulfilled.

126 In your comments to the draft decision you have provided information that only partially addresses the concern raised under '0.1. Assessment of the read-across approach'. You remain responsible for complying with this decision by the set deadline.

127 In your comments to the draft decision, you also state that you are "*discussing the possibility of conducting an OECD 422* […] *as a further proof of the read across*".

128 As this strategy relies on on data which is yet to be generated for the proposed, no conclusion on the compliance of the proposed adaptation can be made. You remain responsible for complying with this decision by the set deadline.

10.3. Specification of the study design

129 Following the criteria provided in Annex IX, Section 8.6.2, Column 2, the oral route is the most appropriate route of administration to investigate repeated dose toxicity of the Substance; Guidance on IRs and CSA, Section R.7.5.6.3.2.

130 According to the OECD TG 408, the rat is the preferred species.

131 Therefore, the study must be performed in rats according to the OECD TG 408, in rats and with oral administration of the Substance.

11. Pre-natal developmental toxicity study in one species

132 A pre-natal developmental toxicity (PNDT) study (OECD TG 414) in one species is an information requirement under Annex IX to REACH (Section 8.7.2.).

11.1. Information provided

133 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

(i) pre-natal developmental toxicity study (1991) with Decanamide, N,N-dimethyl-, mixt. with N,N-dimethyloctanamide, List No. 614-052-2.

11.2. Assessment of the information provided

11.2.1. Read-across adaptation rejected

134 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint specific issue(s) addressed below.

11.2.2. Source study not adequate for the information requirement

135 Under Annex XI, Section 1.5., the study to be read across must have an adequate and reliable coverage of the key parameters addressed in the corresponding test method referred to in Article 13(3), in this case OECD TG 414. Therefore, the following specifications must be met:

a) an exposure duration at least from implantation until one day prior to scheduled caesarean section;

b) examination of the dams for any structural abnormalities, weight and histopathology of the thyroid gland, thyroid hormone measurements, gravid uterus weight, and uterine content.

c) examination of the foetuses for body weight, number and percent of live and dead foetuses and resorptions, sex ratio, external, skeletal and soft tissue alterations (variations and malformations), measurement of anogenital distance in all live rodent foetuses.

136 The study (i) is described as according to OECD TG 414. However, the following specifications are not according to the requirements of OECD TG 414:

a) an exposure duration from day 6 to day 15 post coitum, with termination at day 21.

In your comments to the draft decision, you explain that the study was conducted according to the test guideline available at the time and that "*the exposure period was more focusing on the organ synthesis phase* […] *The same appears to the missing thyroid gland, thyroid hormone measurements, this were not guideline parameters in the nineties*. *Further there are indication from the literature that increasing the exposure period in OECD 414 study did not influence the outcome of developmental parameter that much (e.g.* [redacted] *) which, especially is for this substance group is underlined by the latest findings in an OECD 443 with CAS 14433-76-2 N,N-dimethyldecan-1-amide where doses up to 379 mg/kg did not show any effect on postnatal development nor reproductive effects in F0 or F1 where seen at dosages up to 1148 mg/kg. (see Dossier of CAS 14433-76-2 N,N-dimethyldecan-1-amide; Study* [redacted] *; Full Study report was submitted to ECHA there)".*

In reply, Article 13(3) of REACH requires tests to be conducted in accordance with the test methods laid down in or in accordance with other international test methods recognised by the Commission or the Agency as being appropriate. Test methods recognised by the Commission and ECHA are set out in Commission Regulation (EC) No 440/2008 laying down test methods pursuant to the REACH Regulation[2] (the 'Test Methods Regulation').

According to Article 1 of the Test Methods Regulation, the test methods to be

[2] Council Regulation (EC) No 440/2008 of 30 May 2008 laying down test methods pursuant to the REACH Regulation (OJ L 142, 31.05.2018. p. 1-739), as amended.

applied for the purposes of REACH are set out in the Annex to that Regulation and this applies as of 1 June 2008.

Section B.31 of the Annex to the Test Methods Regulation incorporates OECD TG 414 (2001) into the EU law. EU Test Method B.31 is a replica of the OECD TG 414 of 2001.

In addition, the practical guide 'how to use alternatives to animal testing' (ECHA, 2016) clarifies that "*data from old studies that were not performed according to the current test guidelines may be less reliable or relevant, since the guideline followed may not be in line with the most recent ones. In particular, if fewer (or different) parameters were measured* […]. *Hence, the reliability of such studies may be lower and as a result render them inadequate to be considered as key studies.*" The practical guide warrants a case-by-case analysis of the existing studies. If not adequate on their own, such studies could be adequate within a weight of evidence approach or as supporting studies.

In the present case, ECHA does not consider the provided study from 1991 conducted according to the OECD TG 414 (in force at the time) adequate and reliable as per the standards of the EU Test Method B.31 (replica of the OECD TG 414 from 2001) regarding the exposure duration.

b) no data on examinations of dams: incidence and severity. In particular, you claim that severe clinical signs of reaction to treatment were observed at the top dose, without specifying the nature of these effects. This conflicts with your statement that no detailed clinical observations were made;

In the comments on the draft decision you have provided tabulated data which address this concern regarding missing data. You should submit this information in an updated registration dossier.

c) no data on examinations of foetuses: incidence and severity. In particular, the following investigations are missing: number of live foetuses and anogenital distance.

In the comments on the draft decision you have provided tabulated data which address this concern regarding missing data. You should submit this information in an updated registration dossier.

137 Based on the above, the study does not provide an adequate and reliable coverage of the key parameter(s) addressed by the OECD TG 414 and this study is not an adequate basis for your read-across predictions.

138 On this basis, the information requirement is not fulfilled.

139 In your comments to the draft decision you have provided information that only partially addresses the concern raised under '0.1. Assessment of the read-across approach'. You remain responsible for complying with this decision by the set deadline.

11.3. Specification of the study design

140 A PNDT study according to the test method OECD TG 414 should be performed in rat or rabbit as preferred species.

141 The study must be performed with oral administration of the Substance (Guidance on IRs and CSA, Section R.7.6.2.3.2.).

142 Therefore, the study must be conducted in rats or rabbits with oral administration of the Substance.

References

The following documents may have been cited in the decision.

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

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

Guidance on data-sharing; ECHA (2017).

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

Read-across assessment framework (RAAF)

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

The RAAF and related documents are available online:
https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across

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

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

Appendix 2: Procedure

This decision does not prevent ECHA from initiating further compliance checks at a later stage on the registrations present.

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

The compliance check was initiated on 02 June 2021.

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

ECHA took into account your comments and did not amend the request(s).

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

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

The deadline of the decision is set based on standard practice for carrying out OECD TG tests. It has been exceptionally extended by 12 months from the standard deadline granted by ECHA to take into account currently longer lead times in contract research organisations.

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

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

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

Registrant Name	Registration number	Highest REACH Annex applicable to you
[redacted]	[redacted]	[redacted]

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

Appendix 4: Conducting and reporting new tests for REACH purposes

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

1.1. Test methods, GLP requirements and reporting

(1) Under Article 13(3) of REACH, all new data generated as a result of this decision must be conducted according to the test methods laid down in a European Commission Regulation or to international test methods recognised by the Commission or ECHA as being appropriate.

(2) Under Article 13(4) of REACH, ecotoxicological and toxicological tests and analyses must be carried out according to the GLP principles (Directive 2004/10/EC) or other international standards recognised by the Commission or ECHA.

(3) Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries[3].

1.2. Test material

(1) Selection of the Test material(s)
The Test Material used to generate the new data must be selected taking into account the following:
- the boundary composition(s) of the Substance,
- the impact of each constituent/ impurity on the test results for the endpoint to be assessed. For example, if a constituent/ impurity of the Substance is known to have an impact on (eco)toxicity, the selected Test Material must contain that constituent/ impurity.

(2) Information on the Test Material needed in the updated dossier
- You must report the composition of the Test Material selected for each study, under the "Test material information" section, for each respective endpoint study record in IUCLID.
- The reported composition must include all constituents of each Test Material and their concentration values and other parameters relevant for the property to be tested.

This information is needed to assess whether the Test Material is relevant for the Substance.

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers[4].

[3] https://echa.europa.eu/practical-guides
[4] https://echa.europa.eu/manuals