Section A1 Applicant

Annex Point IIA, I 1

1.1 Applicant

Company name: LANXESS Deutschland GmbH
Contact name: [redacted]
Address: Material Protection Products
Regulatory Affairs Business Line Actives & Disinfectants
[redacted]
Tel.: [redacted]
Fax: [redacted]
E-mail: [redacted]

1.2 Manufacturer of Active Substance (if different)

LANXESS Deutschland GmbH, [redacted]
Contact name: as Applicant
Location of manufacturing plant:
[redacted]

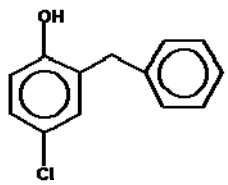
1.3 Manufacturer of Product(s) (if different)

Please refer to Document IIIB, Section 1

Section A2 Identity of Active Substance

Annex point IIA, II 2

Official use only

Subsection (Annex Point)			
2.1	**Common name (IIA, II)**	Common name:	Chlorophene
		EINECS name:	Chlorophene
		Synonyms:	BCP o-Benzyl-p-chlorophenol Benzylchlorophenol 4-Chloro-alpha-phenyl-o-cresol 5-Chloro-2-hydroxydiphenylmethane
		Trade name:	Preventol BP (Lanxess) Nipacide BCP (Clariant)
2.2	**Chemical name (IIA, II 2.2)**	IUPAC name:	2-Benzyl-4-chlorophenol
		CAS name:	Phenol, 4-chloro-2-(phenylmethyl)-
2.3	**Manufacturer´s development code number(s) (IIA, II 2.3)**	No manufacturer's development code number is available for the active substance.	
2.4	**CAS No and EC numbers (IIA, II 2.4)**		
2.4.1	**CAS-No**	120-32-1	
	Isomer 1	Not relevant	
	Isomer n	Not relevant	
2.4.2	**EC-No**	204-385-8	
	Isomer 1	Not relevant	
	Isomer n	Not relevant	
2.4.3	**Other**	Not allocated	
2.5	**Molecular and structural formula, molecular mass (IIA, II 2.5)**		
2.5.1	**Molecular formula**	$C_{13}H_{11}ClO$	
2.5.2	**Structural formula**		
2.5.3	**Molecular mass**	218.7 g/mol	
2.6	**Method of manufacture of the active substance (IIA, II 2.6)**	The method of manufacture of the active substance is confidential. This information is provided separately in the confidential part of the dossier.	

Section A2 Identity of Active Substance

Annex point IIA, II 2

2.7	**Specification of the purity of the active substance, as appropriate (IIA, II 2.7)**	Chlorophene has a specified minimal purity of 95%. Representative production batches of the active substance are analysed for their chlorophene content. This information is confidential and provided separately in the confidential part of the dossier.	**x**
2.8	**Identity of impurities and additives, as appropriate (IIA, II 2.8)**	This information is confidential and therefore provided separately in the confidential part of the dossier.	
2.8.1	**Isomeric composition**	Not relevant for the active substance.	
2.9	**The origin of the natural active substance or the precursor(s) of the active substance (IIA, II 2.9)**	Not relevant as the active substance has no natural origin.	

Section A2 Identity of Active Substance

Annex point IIA, II 2

Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	19 April 2011
Materials and methods	Agree with applicant's version.
Conclusion	Agree with applicant's version
Reliability	-
Acceptability	Acceptable
Remarks	**Comment (2.7.)**: The corrected specification is proposed by eCA, based on the information on impurities and the submitted 5-batch analyses. Specification is attached to the confidential part of the dossier

Section A2.10
Annex Point IIA2.10

Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, p. 1) amending Council Directive 67/548/EEC

Official use only

Subsection

2.10.1 Human exposure towards active substance

2.10.1.1 Production

[redacted]

i) Description of process	The process description is provided in the confidential part of the dossier (A2.6 confidential).
ii) Workplace description	The whole reaction process is carried out in a closed device. All substance related occupational limit concentrations are met in the plant. Potential human exposure is only possible during loading and cleaning/service processes. All handling with respect on these processes are carried out using personal protection measures which are related to the respective task (up to full personal protection for special cleaning and service tasks where this is necessary).
iii) Inhalation exposure	Due to the effective personal protection during the above mentioned tasks and the closed plant technology including effective exhaustion neither dermal nor inhalation exposure is expected for the people involved in the production of chlorophene.
iv) Dermal exposure	Due to the effective personal protection during the above mentioned tasks and the closed plant technology including effective exhaustion neither dermal nor inhalation exposure is expected for the people involved in the production of chlorophene.

2.10.1.2 Intended use(s)

1. Professional Users

i) Description of application process	PT 2: Surface disinfection by wiping with cloth Chlorophene is used as active substance in microbicidal surface disinfectants (biocidal product type 2.01) intended for disinfection of surfaces in hospitals by professional users. The professional use is mopping of large areas, i.e. floors, by cleaning personnel as well as wiping smaller surfaces by professional health care personnel. PT 3: Surface disinfection by medium pressure spraying Chlorophene is used to control pathogenic micro-organisms in industrial poultry barn, other intensive livestock farming installations and similar facilities. The product is applied to surfaces using a rod and nozzle that sprays an even layer across the surface to be disinfected.
ii) Workplace description	PT 2: Health care (medical practice) PT 3: Animal housing Please refer to the information given above (description of application process).

Section A2.10
Annex Point IIA2.10

Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, p. 1) amending Council Directive 67/548/EEC

	iii) Inhalation exposure	See Doc II B and C.	
	iv) Dermal exposure	See Doc II B and C.	
	2. Non-professional Users including the general public	PT 2: Surface cleaning, incl. mixing & loading	
	(i) via inhalational contact	See Doc II B and C.	
	(ii) via skin contact	See Doc II B and C.	
	(iii) via drinking water	not relevant	
	(iv) via food	not relevant	**x**
	(v) indirect via environment	not relevant	
2.10.2	**Environmental exposure towards active substance**		
2.10.2.1	**Production**		
	(i) Releases into water	No direct contact of water with product is to be considered, as it is not part of the process. Water is used for cleaning purposes only. The product is processed using a cooling drum .The cooling drum is cleaned with water, which is routed to the central waste water treatment plant on site. Additionally, water is used for the scrubbing of waste air streams coming from the process. The scrubbing liquids contain, besides inorganic components, traces of organic matter - they are piped to the waste water treatment plant as well.	
	(ii) Releases into air	Waste air from the process is routed to an on site incineration unit and burned at about 850 degrees Celsius.	
	(iii) Waste disposal	The residues of the process are collected, transported to the central incineration plant and burned under controlled conditions.	
2.10.2.2	**Intended use(s)**	Chlorophene is to be used as a microbicidal surface disinfectant intended for disinfection of surfaces in hospitals and private areas by professional and non-professional users (PT 2). It is also used to control pathogenic micro-organisms in industrial poultry barns and pig stables (PT 3).	**x**
	Affected compartment(s):		
	STP, surface water	**Product type 2:**	

Section A2.10
Annex Point IIA2.10

Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, p. 1) amending Council Directive 67/548/EEC

and sediment	Release to sewage treatment plants (STP): Emissions of chlorophene from its use in PT 2 are directed to wastewater. Sewage water treatment plants can therefore be regarded as the only pathway for direct chlorophene emissions following this end use. Release to surface water and sediment: Due to the indoor use of the product, there are no direct emissions of chlorophene to surface water and sediment. Indirect emissions via STP effluents containing potential chlorophene residues occur into surface water bodies (water and sediment). Hence, surface water and sediment concentrations are calculated for the environmental risk assessment. **Product type 3:** Release to sewage treatment plants (STP): According to the Supplement to the Emission Scenario Document for Product Type 3 (Veterinary hygiene biocidal products) released in 2010, an emission to waste water can take place for some poultry housing types (EC 2010: p.10). Therefore, in the risk assessment this pathway will be considered for the relevant animal categories (poultry). For all other animal categories a discharge of Chlorophene to STP will not be taken into account. Release to surface water and sediment: An indirect entry of chlorophene to surface water/sediment via STP (relevant for poultry housing only) and run-off after field application of biocide containing manure/slurry is assumed for worst case consideration.	x
Air	Based on the vapour pressure and Henry's Law constant, no significant volatilisation of chlorophene is to be expected. Therefore, no concentrations are calculated..	
Soil	**Product type 2:** Due to the exclusive indoor use-pattern of chlorophene as hard surface disinfectant, potential direct emissions to soil / groundwater are considered negligible. However, soil contamination could arise indirectly, via the application of STP sludge. This route of emission is considered in the risk assessment. After entering the soil compartment, no significant mobility of the parent compound to groundwater is indicated. Therefore, calculations of chlorophene concentrations in soil pore water / ground water are not considered as being relevant. **Product type 3:** Due to the use pattern of chlorophene, potential direct contamination of the environment via the soil pathway is considered negligible. However, soil is possibly exposed to chlorophene due to application of STP sludge (relevant for poultry housing only) and due to field application of manure/slurry stored in collection systems together with the drained off treatment solution of chlorophene. After entering the soil compartment, chlorophene is strongly bound to the soil matrix and no significant mobility of the parent compound to groundwater is	

Section A2.10
Annex Point IIA2.10

Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, p. 1) amending Council Directive 67/548/EEC

	indicated.
Predicted concentration in the affected compartment(s)	
STP, surface water and sediment	**See Document II-B on PT 2 and PT 3, respectively.**
Air	Based on the vapour pressure and Henry's Law constant, no significant volatilisation of chlorophene is to be expected. Therefore, no concentrations are calculated.
Soil	**See Document II-B on PT 2 and PT 3, respectively.**

Evaluation by Competent Authorities

EVALUATION BY RAPPORTEUR MEMBER STATE

Date	19 April 2011
Materials and methods	Agree with applicant's version
Conclusion	Agree with applicant's version
Reliability	-
Acceptability	Acceptable
Remarks	**Comment (2.10.1.2, 2(iv))**: PT3: An analytical method for the determination of chlorophene residues in/on food or feedstuffs was not submitted by the Applicant for the biocidal product. As the Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products is not yet applicable, an assessment of potential consumer exposure via residues in livestock was not included in the risk assessment by the Rapporteur. When authorising products that may lead to residues in food or feed, the need to assess potential consumer risk via residues in food must be considered. In addition the need for setting MRL must be considered when guidance and method for residue assessment of biocide use in PT 3 has been agreed. If the establishment of MRLs is found to be needed, a verified analytical method for analysing residues in livestock must be submitted and evaluated **Comment (2.10.2.2)**: The only evaluated animal category is poultry, as agreed by the applicant

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.1 Melting point, boiling point, relative density (IIA, III 3.1)								
3.1.1 Melting point	Internal method, corresponding to EC method A.1 (Differetntial thermal analysis (DTA))	Purity: 97.9% Specification: min. 95%	45.9 °C	–	Y	1	Jungheim, 2007a	
3.1.2 Boiling point	Internal method, corresponding to EC method A.2 (DTA)	Purity: 97.9% Specification: min. 95%	Up to the decomposition there is no boiling point of the active substance.	–	Y	1	Jungheim, 2007a	
3.1.3 Bulk density/ relative density								
Relative density	Internal method corresponding to EC method A.3 (Pychnometer method)	Purity: 97.9% Specification: min. 95%	1.317 at 20 °C	–	Y	1	Jungheim, 2007a	
Bulk density	Internal method corresponding to CIPAC MT 186 (Substance Jolting Volumeter method)	Purity: 97.9% Specification: min. 95%	Pour density: 0.66 g/mL Tap density: 0.70 g/mL	–	Y	1	Jungheim, 2007a	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.2 Vapour pressure and Henry´s Law Constant (IIA, III 3.2)								
Vapour pressure	EC method A.4 (Gas saturation method)	Purity: 97.7% Specification: min. 95%	< 1.0E-03 Pa at 20 °C and 25 °C 1.66E-02 Pa at 50 °C	–	Y	1	Olf, 2006	
Henry's Law Constant	Calculation (Ratio between vapour pressure and water solubility)	–	1.87×10^{-03} Pa×m^3×mol^{-1} at 20 °C	–	N	2	Beiell, 2007	
3.3 Appearance (IIA, III 3.3)								
3.3.1 Physical state	Visual inspection	Purity: 98% Specification: min. 95%	Solid	–	N	2	Kraus, 2006a	
3.3.2 Colour	Visual inspection	Purity: 98% Specification: min. 95%	White to slightly yellow	–	N	2	Kraus, 2006a	
3.3.3 Odour	Olfactory inspection	Purity: 98% Specification: min. 95%	Slightly phenolic	–	N	2	Kraus, 2006a	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.4 Absorption spectra (IIA, III 3.4)								
UV/VIS	Since no official (OECD) guideline is available the test was performed according to internal standard operation procedures.	Purity: 97.7% Specification: min. 95%	Chlorophene was identified by UV/VIS spectrum; acetonitrile was used as solvent. Maxima at 284 nm (ε = 3995 l $mol^{-1}cm^{-1}$)	No UV absorbance above 290 nm.	Y	1	Jungheim, 2007b	
IR	Since no official (OECD) guideline is available the test was performed according to internal standard operation procedures.	Purity: 97.7% Specification: min. 95%	Chlorophene was identified by FTIR using a potassium bromide cell.	–	Y	1	Jungheim, 2007b	
NMR	Since no official (OECD) guideline is available the test was performed according to internal standard operation procedures.	Purity: 97.7% Specification: min. 95%	Chlorophene was identified by ^{1}H-NMR and ^{13}C-NMR spectra; $CDCl_3$ was used as solvent.	–	Y	1	Jungheim, 2007b	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
MS	Since no official (OECD) guideline is available the test was performed according to internal standard operation procedures.	Purity: 97.7% Specification: min. 95%	Chlorophene was identified by 70 eV electron impact ionisation mass spectrum (EI-MS).	–	Y	1	Jungheim, 2007b	
3.5 Solubility in water (IIA, III 3.5)	OECD guideline 105 / EC method A.6 (flask method, detection by HPLC))	Purity: 97.9% Specification: min. 95%	Results for chlorophene at pH 7: 0.083 g/L at 10°C 0.117 g/L at 20°C 0.199 g/L at 30°C	Temperature dependence on water solubility was observed.	Y	1	Jungheim, 2006a	
3.6 Dissociation constant (-)	OECD guideline 112	Purity: 96.8% Specification: min. 95%	pKa = 9.59	–	Y	1	Greenwood, 2003a	
3.7 Solubility in organic solvents, including the effect of temperature on solubility (IIIA, III 1)	CIPAC MT 157 CIPAC MT 181	Purity: 97.9% Specification: min. 95%	The solubility of chlorophene in methanol and toluene at 10, 20 and 30 °C is > 250 g/L.	–	Y	1	Jungheim, 2007c	
3.8 Stability in organic solvents used in b.p. and identity of relevant breakdown products (IIIA, III 2)	–	–	–	The active substance as manufactured does not include an organic solvent. Therefore no study regarding its stability in organic solvents was performed.	–	–	–	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.9 Partition coefficient n-octanol/water (IIA, III 3.6)	Draft OECD guideline 122 (November 2000) (pH-Metric Method for Ionisable Substances)	Purity: 96.8% Specification: min. 95%	Results at 25 °C: The log Pow is 4.276 for the unionised species. Log Pow = 4.276 (pH 4) Log Pow = 4.275 (pH 7) Log Pow = 4.175 (pH 9)	The log Pow changed little over the pH range of pH 4 to pH 9. An effect of temperature is not expected.	Y	1	Greenwood, 2003a	
3.10 Thermal stability, identity of relevant breakdown products (IIA, III 3.7)	Internal method corresponding to EC method A.1 (DTA)	Purity: 97.9% Specification: min. 95%	Endothermal melting from 37 °C to 65 °C. Exothermal decomposition starts at 110 °C.	–	Y	1	Jungheim, 2007a	
3.11 Flammability, including auto-flammability and identity of combustion products (IIA, III 3.8)								
Flammability	EC method A.10	Purity: 97.9% Specification: min. 95%	The active substance is not highly flammable.	–	Y	1	Heinz, 2007	
Evolution of flammable gases when contact with water	EC method A.12	Purity: 97.9% Specification: min. 95%	The active substance does not liberate flammable gases in hazardous amounts.	–	Y	1	Heinz, 2007	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
Pyrophoric properties	EC method A.13	Purity: 97.9% Specification: min. 95%	The active substance does not deliver indications of pyrophoric properties during the realisation of other tests.	–	Y	1	Heinz, 2007	
Auto-flammability	EC method A.16	Purity: 97.9% Specification: min. 95%	The active substance does not undergo spontaneous combustion. There is no decomposition to the melting point.	–	Y	1	Heinz, 2007	
3.12 Flash-point (IIA, III 3.9)	–	–	–	Not performed because the active substance is solid.	–	–	–	
3.13 Surface tension (IIA, III 3.10)	OECD guideline 115 / EC method A.5	Purity: 97.9% Specification: min. 95%	57.3 mN/m at 20 °C	Chlorophene is surface active.	Y	1	Jungheim, 2007a	
3.14 Viscosity (-)	–	–	–	Not performed because the active substance is solid.	–	–	–	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.15 Explosive properties (IIA, III 3.11)	–	–	–	Not performed because the active substance does not present any risk for explosion. No functional groups with explosive properties present, and a calculated oxygen balance of chlorophene is -223.15 indicating a low explosive properties.	–	–	–	

Section A3 Physical and Chemical Properties of Active Substance*

Annex point IIA, III 3

Subsection (Annex Point)	Method	Purity/ Specification	Results	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
3.16 Oxidizing properties (IIA, III 3.12)	–	–	–	Not performed because the active substance does not present oxidising properties. Due to its chemical structure the active substance chlorophene does not contain functional groups in its molecular backbone which are known to enhance oxidising properties. The atoms oxygen and chlorine, presented in the chemical structure, are only bonded to carbon and/or hydrogen.	–	–	–	
3.17 Reactivity towards container material (IIA, III 3.13)	Not relevant (statement based on experience in use)	Specification: min. 95%	Judged from the experience in use since many years and based on the chemical structure chlorophene is not reactive towards the following container materials: paper, glass, PE, steel (zinc coated) and high-grade steel.	–	N	2	Kraus, 2006b and 2008	

* All the tests were performed with chlorophene as manufactured by Lanxess, except for III-A3.6 and III-A3.9, which were performed with chlorophene as manufactured by Clariant.

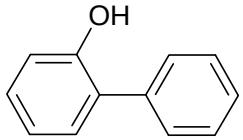
Section A3 Physical and Chemical Properties of Active Substance

Annex point IIA, III 3

Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	19 April 2011
Evaluation of data submitted under section A3	**3.1 Melting point, boiling point, relative density** Agree with applicant's version **3.2. Vapour pressure and Henry's Law Constant** Agree with applicant's version **3.3. Appearance** Agree with applicant's version **3.4. Absorption spectra, and mass spectrum** Agree with applicant's version **3.5. Water solubility** Agree with applicant's version (see also justification for non submission of data) **3.6. Dissociation constant** Agree with applicant's version. Test material from different source, but deemed to be acceptable. **3.7. Solubility in organic solvents** Agree with applicant's version **3.9 Partition coefficient *Log Pow*** Agree with applicant's version (see also justification for non submission of data on temperature dependence). Test material from different source, but deemed to acceptable. **3.10 Thermal stability** Agree with applicant's version **3.11 Flammability, including auto-flammability and identity of combustion products** Agree with applicant's version **3.13 Surface tension** Agree with applicant's version **3.17 Reactivity towards container material** Agree with applicant's version

Section A3 **Subsection A3.5** **Annex Point IIA, III 3.5**	**Physical and Chemical Properties of the Active Substance** SOLUBILITY IN WATER, PH DEPENDENCE	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ]	**Technically not feasible [ ]** **Scientifically unjustified [ ]**	
Limited exposure [ ]	**Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion **Remarks**	[redacted]	

Table A3_5-1: Identity of *ortho*-Phenylphenol

Common name / ISO name	*ortho*-Phenylphenol / o-Phenylphenol
Synonyms	OPP, 2-Biphenylol, 2-Hydroxybiphenyl
CAS-No.	90-43-7
EINECS-No.	201-993-5
IUPAC Name	2-Phenylphenol
CAS Name	[1,1'-Biphenyl]-2-ol
Molecular formula	$C_{12}H_{10}O$
Structural formula	
Molecular weight (g/mol)	170.2 g/mol

Section A3 **Subsection A3.8** **Annex Point IIIA, III 2**	**Physical and Chemical Properties of the Active Substance** STABILITY IN ORGANIC SOLVENTS	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	

Section A3 **Subsection A3.9** **Annex Point IIA, III 3.6**	**Physical and Chemical Properties of the Active Substance** PARTITION COEFFICIENT N-OCTANOL/WATER – PH/TEMPERATURE DEPENDENCE	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ]	**Technically not feasible [ ]** **Scientifically unjustified [ ]**	
Limited exposure [ ]	**Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	24 October 2008	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks	[redacted]	

Section A3 **Subsection A3.12** **Annex Point IIA, III 3.9**	**Physical and Chemical Properties of the Active Substance** FLASH POINT	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks	[redacted]	

Section A3 **Subsection A3.14** **Annex Point (-)**	**Physical and Chemical Properties of the Active Substance** VISCOSITY	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks	[redacted]	

Section A3 **Subsection A3.15** **Annex Point IIA, III 3.11**	**Physical and Chemical Properties of the Active Substance** EXPLOSIVE PROPERTIES	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks	[redacted]	

Section A3 **Subsection A3.16** **Annex Point IIA, III 3.12**	**Physical and Chemical Properties of the Active Substance** OXIDISING PROPERTIES	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [ ]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X]**	
Detailed justification:	[redacted]	
Undertaking of intended data submission [ ]	[redacted]	
	Evaluation by Competent Authorities	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	19 April 2011	
Evaluation of applicant's justification	[redacted]	
Conclusion	[redacted]	
Remarks	[redacted]	