Section 7.4.3.5.1b Annex Point IIIA 13.2.3	Effects on marine sediment dwelling organisms	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [X] **Limited exposure [X]**	**Technically not feasible [X]** **Scientifically unjustified [X]** **Other justification [..]**	
Detailed justification:	A further test on effects on marine sediment dwelling organisms was not done for the active dichlofluanid due to the following reasons: According to water sediment studies the active dichlofluanid degrades very rapidly in freshwater sediments to DMSA (Dimethylaminosulfanilid, CAS 4710-17-2). The DT 50 of dichlofluanid in freshwater sediments were between 0.5 and 2.2 hours at 20°C. DMSA has no tendency to stay in the sediment phase to its polar structure. This is also confirmed by the results of the water sediment studies. Due to the pH of 8.2 in seawater half-lives in marine sediment are assumed to be even be even lower than in freshwater sediment. Therefore no long time exposure of sediment dwelling organisms to dichlofluanid can be expected in marine environments. This was confirmed e.g. during the development of analytical methods for sediment in the course of the TNO monitoring study in Greek marinas: No direct method for dichlofluanid could be developed due to its rapid degradation to DMSA. However, a water spiked acute limit test is available for dichlofluanid on *corophium volutator*. For DMST* an acute test on *leptocheirus plumulosus* is available where also the sediment was spiked and analysed. Taking the above mentioned arguments into account it is justified not to perform a further testing on sediment test on marine sediment dwelling organisms for dichlofluanid or its degradation product DMSA. * DMST (Dimethylaminosulfotoluidid, CAS 66840-71-29) is the degradation product of tolylfluanid (CAS 7311-37-1), an active very similar to dichlofluanid with regard to chemical structure, aqua-toxicity and environmental behaviour including the degradation product. Data for DMST are bridged to DMSA in the scope of the PT 21 dossier for dichlofluanid.	
Undertaking of intended data submission [ ]	–	

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	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	19/11/13
Evaluation of applicant's justification	Under the previous PT 8 review, the view of the UK CA was that the sediment compartment was not relevant for dichlofluanid. This was based on evidence presented within the fate (sediment:water) and sediment toxicity studies, which show that levels of both dichlofluanid and DMSA in sediment are very low. Dichlofluanid dissipates rapidly in seawater (agreed DT50 from PT 8 = 1.21 h (20°C, pH 8.2)) and, whilst more persistent in the water phase, DMSA has a low Koc of 53, which indicates that it is not likely to sorb to sediment (TGD, p.111). An assessment of the risk to sediment-dwelling organisms has however been conducted for DMSA, in line with the TMI06 request. It is noted that a dichlofluanid study has been submitted on the marine sediment-dwelling mud shrimp *Corophium volutator* but this was a prolonged rather than true chronic study and exposure appears to have been almost entirely through the water phase. This study is considered above as part of the whole $PNEC_{SURFACEWATER}$ assessment but it adds little to a consideration of $PNEC_{SEDIMENT}$ in freshwater or marine situations.
Conclusion	The applicant's justification is accepted. No further data on the toxicity of dichlofluanid to sediment-dwelling organisms in aquatic organisms is required. A study on the toxicity of DMSA to *Chironomus riparius* has been submitted
Remarks	
	COMMENTS FROM OTHER MEMBER STATE *(specify)*
Date	*Give date of comments submitted*
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Remarks	