

## **Committee for Risk Assessment**

### **RAC**

Annex 3

### **Records**

of the targeted public consultation following the correction of a typographical error in the original CLH dossier on

**metribuzin (ISO); 4-amino-6-tert-butyl-3-methylthio-1,2,4-triazin-5(4H)-one; 4-amino-4,5-dihydro-6-(1,1-dimethylethyl)-3-methylthio-1,2,4-triazin-5-one**

**EC Number: 244-209-7**  
**CAS Number: 21087-64-9**

CLH-O-0000007008-77-01/F

**Adopted**

**10 June 2021**

### **ANNEX 3 – RECORDS OF THE AD HOC CONSULTATION ON METRIBUZIN (ISO); 4-AMINO-6-TERT-BUTYL-3-METHYLTHIO-1,2,4-TRIAZIN-5(4H)-ONE**

#### **COMMENTS AND RESPONSE TO COMMENTS ON CLH: PROPOSAL AND JUSTIFICATION**

The proposal for the harmonised classification and labelling (CLH) of metribuzin (ISO); 4-amino-6-tert-butyl-3-methylthio-1,2,4-triazin-5(4H)-one was submitted by Estonia and was subject to a standard consultation, from 03/08/2020 to 02/10/2020. The comments received by that date are compiled in Annex 2 to the opinion.

However, a typographical error was present in the version of the CLH dossier on metribuzin (ISO); 4-amino-6-tert-butyl-3-methylthio-1,2,4-triazin-5(4H)-one which was under consultation. In table 3 on page 3, the proposed chronic M-factor is 100, not 10; no other section of the dossier is affected. An ad hoc consultation was launched from 15/03/2021 to 29/03/2022 in order to ensure that all comments were framed based on correct information in relation to the classification proposed and the comments received are listed below.

All comments and attachments including confidential information received during the consultation have been provided in full to the dossier submitter (Member State Competent Authority), the Committees and to the European Commission.

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**Substance name: metribuzin (ISO); 4-amino-6-tert-butyl-3-methylthio-1,2,4-triazin-5(4H)-one**  
**EC number: 244-209-7**  
**CAS number: 21087-64-9**  
**Dossier submitter: Estonia**

#### **GENERAL COMMENTS**

| Date   | Country | Organisation | Type of Organisation | Comment number |
|--|---------|--------------|----------------------|----------------|
| 16.03.2021   | Belgium |              | Individual           | 1              |
| Comment received   |         |              |                      |                |
| The updated CLH report contains no reference to the fact that a previous version was published under the same version number, nor a version history. There are now two versions circulating of this document, both with the same version number and date, but with different M-factors for Aquatic Chronic 1 classification on page 3. |         |              |                      |                |
| RAC's response   |         |              |                      |                |
| Thank you for the comment. Noted.  |         |              |                      |                |

#### **OTHER HAZARDS AND ENDPOINTS – Hazardous to the Aquatic Environment**

| Date  | Country        | Organisation                | Type of Organisation | Comment number |
|---|----------------|-----------------------------|----------------------|----------------|
| 29.03.2021  | United Kingdom | Health and Safety Executive | National Authority   | 2              |
| Comment received  |                |                             |                      |                |
| metribuzin (EC 244-209-7; CAS 21087-64-9)<br>The proposed Aquatic Chronic 1 classification and M-factor of 100 is based on a NOErC of 0.000205 mg a.s./L for Lemna gibba based on frond number. An ErC10 of 0.0059 mg/L based on frond number is available from the same study which would result in a chronic M-factor of 10 for the non-rapidly degradable substance. |                |                             |                      |                |
| We note that there is a preference for using EC10 values over NOEC values for hazard classification (ECHA, 2017) and this has been the case for previous substance datasets   |                |                             |                      |                |

**ANNEX 3 – RECORDS OF THE AD HOC CONSULTATION ON METRIBUZIN (ISO); 4-AMINO-6-TERT-BUTYL-3-METHYLTHIO-1,2,4-TRIAZIN-5(4H)-ONE**

considered by RAC.

Based on all the ecotoxicity data in the CLH report, we consider that the most reliable endpoints for chronic classification are in the range from 0.001-0.01 mg/L: *Lemna gibba* 7-d ErC10 = 0.0059 mg a.s./L based on frond number 0.00678 mg a.s./L based on frond area & 0.0056 mg a.s./L based on biomass; *Desmodium subspicatus* 72-h ErC10 = 0.00516 mg a.s./L; and *Myriophyllum spicatum* 14-d ErC10 = 0.00507 mg a.s./L based on dry weight, 0.00713 mg a.s./L based on fresh weight & 0.00764 mg a.s./L based on total shoot length. These endpoints support a chronic M-factor of 10 for the non-rapidly degradable substance.

ECHA (2017). Guidance on the application of the CLP criteria. Version 5.0. Helsinki: ECHA.

**RAC's response**

RAC agrees that there is a preference for using EC10 values. RAC also agrees that the most reliable endpoints for chronic classification are in the range from 0.001-0.01 mg/L. The lowest ErC10 value is 0.00506 mg/L (based on growth rate of biomass) for *Lemna gibba*. RAC considers the *Myriophyllum spicatum* study as supportive evidence in this case. Although the concentrations of metribuzin in overlaying water in aged media ranged between 88.7 and 110%, the pore water concentrations ranged between 22.7 and 47.5%. A sediment-rooted aquatic macrophyte as *Myriophyllum* takes up contaminants from pore water directly through the roots and it is not possible to conclude that the effect is solely based on metribuzin in overlaying water. RAC agrees that M=10 is warranted for metribuzin chronic classification.