CLH report

Proposal for Harmonised Classification and Labelling

Based on Regulation (EC) No 1272/2008 (CLP Regulation), Annex VI, Part 2

International Chemical Identification:

tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate

EC Number: 401-190-1

CAS Number: 101200-48-0

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Note on confidential information

Please be aware that this report is intended to be made publicly available. Therefore it should not contain any confidential information. Such information should be provided in a separate confidential Annex to this report, clearly marked as such.

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1 IDENTITY OF THE SUBSTANCE

1.1 Name and other identifiers of the substance

Table 1: Substance identity and information related to molecular and structural formula of the substance

Name(s) in the IUPAC nomenclature or other international chemical name(s)	Methyl 2-[4-methoxy-6-methyl-1,3,5-triazin-2- yl(methyl)carbamoylsulfamoyl]benzoate
international chemical name(s)	y (me uly i) eu oumoy isuntumo y ijoenzoute
Other names (usual name, trade name, abbreviation)	DPX-L5300 (development code number)
ISO common name (if available and appropriate)	Tribenuron-methyl
EC number (if available and appropriate)	401-190-1
EC name (if available and appropriate)	Methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N- methylcarbamoylsulfamoyl]benzoate
CAS number (if available)	101200-48-0
Other identity code (if available)	546.201 (CIPAC No)
Molecular formula	C ₁₅ H ₁₇ N ₅ O ₆ S
Structural formula	$ \begin{array}{c} $
SMILES notation (if available)	Cc1nc(nc(n1)OC)N(C)C(=O)NS(=O)(=O)c2cccc2C(=O)OC
Molecular weight or molecular weight range	395.4 g/mol
Information on optical activity and typical ratio of (stereo) isomers (if applicable and appropriate)	Not relevant – tribenuron-methyl does not contain any stereoisomers
Description of the manufacturing process and identity of the source (for UVCB substances only)	Not relevant – tribenuron-methyl is no UVCB
Degree of purity (%) (if relevant for the entry in Annex VI)	960 g/kg

1.2 Composition of the substance

Constituent	Concentration range	Current CLH in	Current self-
(Name and numerical identifier)	(% w/w minimum	Annex VI Table 3.1	classification and
	and maximum in	(CLP)	labelling (CLP)
	multi-constituent		
	substances)		
tribenuron-methyl (ISO); methyl 2-	Min. 96%	Skin Sens. 1	There are four
[N-(4-methoxy-6-methyl-1,3,5-		H317	aggregated
triazin-2-yl)-N-		Aquatic Acute 1	notifications with a
methylcarbamoylsulfamoyl]benzoate		H400	total of 123 notifiers.
		Aquatic Chronic 1 H410	The main notification
		M=100	comprising 66 notifiers has the same proposal
		111-100	as the current
			harmonised
			classification but
			without a M-factor.
			The second notification
			(53 notifiers) has the
			same proposal as the
			current harmonised
			classification. The
			other minor
			notifications proposes
			Skin Sens. 1 only (3
			notifiers) and the
			current harmonised
			classification with the
			addition of the supplementary hazard
			supplementary nazard statement code
			EUH401 (one
			notification).
		l	nouncauon).

Table 2: Constituents (non-confidential information)

Table 3: Impurities (non-confidential information) if relevant for the classification of the substance

Impurity	Concentration	Current CLH in	Current self-	The impurity
(Name and	range	Annex VI Table 3.1	classification and	contributes to the
numerical	(% w/w minimum	(CLP)	labelling (CLP)	classification and
identifier)	and maximum)			labelling
No impurity is				
considered relevant				
for the classification				
(i.e. information on				
impurities is only				
presented as				
confidential				
information in the				
IUCLID-dossier				
section 1)				

Table 4: Additives (non-confidential information) if relevant for the classification of the substance

Additive (Name and numerical identifier)	Function	Concentration range (% w/w minimum and maximum)	Current CLH in Annex VI Table 3.1 (CLP)	The additive contributes to the classification and labelling
Tribenuron- methyl does not contain any additives				

SAMPLE	Assay, %	STUDY	YEAR	STUDIES
L5300-9	94	HLO 369-83	1983	Primary irritation and sensitization study in guinea pigs
L5300-9	94	HLR 245-83, Revision No. 2	1988	Mutagenicity testing of INL-5300-9 in the Salmonella typhimurium plate incorporation assay
L5300-13	99	HLR 413-83 HLR 413-83, SU1	1985 2000	Ninety-day feeding and one-generation reproduction study in rats with benzoic acid, 2- [[[[N-(4-methoxy-6-methyl-1,3,5- triazin-2-yl)-N- methylamino]carbonyl]amino]sulfonyl]-, methyl ester (INL-5300)
L5300-14	96.6	HLR 627-87	1987	Primary eye irritation study with IN L5300-14 in rabbits
L5300-14	96.6	HLR 712-87	1988	Closed-patch repeated insult dermal sensitization study (Buehler method) with IN L5300-14 in guinea pigs
L5300-14	98	HLR 580-85	1985	Four-week range-finding and ninety-day feeding study in mice with INL-5300
L5300-20	96.8	HLO 514-85 HLO 514-85, SU1	1985 2000	A three-month feeding study in dogs with H-15527
L5300-20	96.8	HLR 565-84	1985	Assessment of INL-5300-20 in the in vitro unscheduled DNA synthesis in primary rat hepatocytes
L5300-20	96.8	HLR 286-85	1985	In vivo assay of INL-5300-20 for chromosome aberrations in rat bone marrow cells
L5300-20	96.8	HLR 420-85	1985	Mouse bone marrow micronucleus assay of INL- 5300-20
L5300-20	96.8	HLR 61-87 HLR 61-87, SU1 HLR 61-87 SU2 HLR 61-87 SU3	1987 1987 1987 2000	Combined chronic toxicity/oncogenicity study with INL-5300
L5300-20	96.8	HLR 112-89 HLR 112-89 SU1	1989 2000	Ninety-day feeding study with IN L5300-20: Effect on estrous cycle
L5300-22	95.8	HLR 565-86	1986	One-year feeding study in dogs with IN L5300
L5300-22	94.2	HLR 60-87	1987	Oncogenicity study with INL-5300; eighteen- month feeding study in mice
L5300-22	94.2	HLR 193-86 HLR 193-86 SU1 HLR 193- 86 SU2	1986 1988 2000	Two-generation reproduction study in rats with IN- L5300

Table 5: Test substances (non-confidential information)

L5300-22	94.2	HLO 513-85 HLO 513-85 SU1	1985 2000	Developmental toxicity study of L-5300 in the rat
L5300-22	94.2	HLR 150-86 HLR 150-86, SU1	1986 2000	INL-5300. Developmental toxicity study in rabbits dosed by gavage on days 7-19 of gestation
L5300-35	95	NOTOX 0382/510	1986	Assessment of the skin sensitization potential of L5300 in the guinea-pig (Magnusson and Kligman maximization test)
L5300-35	95	NOTOX 0382/534	1986	Assessment of the subacute oral toxicity of L5300 in the rat: 28-day study
L5300- 104	95.8	HLR 376-94	1994	Primary dermal irritation study with DPX- L5300-104 in rabbits
L5300- 203	97.8	DuPont-3366	1999	Tribenuron methyl technical (DPX-L5300): Acute dermal toxicity study in rats
L5300- 203	97.8	DuPont-2938	2000	Tribenuron methyl (DPX-L5300): In vitro mammalian chromosome aberration test
L5300- 203	97.8	DuPont-3387	2000	Tribenuron methyl (DPX-L5300): In vitro mammalian cell gene mutation (CHO/HGPRT) test with an independent repeat assay
L5300- 203A	97.7	DuPont-3090	1999	Tribenuron methyl (DPX-L5300): Inhalation median lethal concentration (LC50) study in rats
L5300- 271	99.3	DuPont-37516	2013	Tribenuron methyl (DPX-L5300) technical: In vitro 3T3 NRU phototoxicity test
L5300- 281	98.2	Dupont-31858	2011	Tribenuron methyl (DPX-L5300) technical: 28- Day immunotoxicity feeding study in rats
Lot B1026	97.7	CIT 7611 TSL	1992	DPX-L5300 technical toxicity study for 28 days by dermal application to rabbits

SAMPLE	Assay, %	STUDY	YEAR	STUDIES
L5300-20	96.8	HLO 568-84	1984	An acute oral toxicity study in the bobwhite with #H 15, 527 Wildlife International Ltd (USA)
L5300-20	96.8	HLO 570-84	1984	A dietary LC50 study in the bobwhite with H#15,527
L5300-20	96.8	HLO 569-84	1984	A dietary LC50 study in the mallard with H#15,527
L5300-20	96.8	HLR 228-86 Revision No. 2	1987	Static acute 96-hour LC50 of INL-5300-20 to bluegill sunfish (Lepomis macrochirus)
L5300-20	95.8	HLR 311-89	1989	Flow-through 21-day LC50 and NOEC of DPX- L5300-20 to rainbow trout (Salmo gairdneri)
L5300-20	95.8	HLR 164-89 Revision No 1	2013	Chronic toxicity of IN L5300-20 to Daphnia magna
L5300-20	95.8	AMR 2038- 91 Revision No 1	1992	Influence of tribenuron methyl on seed germination, seedling emergence, and vegetative vigor of several terrestrial plants
L5300-104	92.56 97.7	AMR 3070- 94 Revision No 1	2000	Tribenuron methyl (DPX-L5300): Influence on growth and reproduction of Lemna gibba G3
L5300-104	95.8	HLO 11-95	1995	DPX-L5300-104: A reproduction study with the northern bobwhite (Colinus virginianus)
L5300-104	95.8	HLO 12-95	1995	DPX-L5300-104: A reproduction study with the mallard (Anas platyrhynchos)
L5300-143	97.4	DuPont- 1222	1998	Tribenuron methyl technical (DPX-L5300): Influence on growth and growth rate of the green alga Selenastum capricornutum
L5300-143	97.4	DuPont- 1221	1998	Tribenuron methyl technical (DPX-L5300): Influence on growth and growth rate of the blue-green alga Anabaena flos-aquae
L5300-152 ^a L5300-153	99.7 98.9	AMR 4201- 96	1996	DPX-L5300: Acute toxicity to the rainbow trout, Oncorhynchus mykiss
L5300- 152 ² L5300-153	99.7 98.9	AMR 4202- 96	1996	DPX-L5300: Acute toxicity to the daphnid, Daphnia magna
L5300-184	98.44	AMR 5166- 98	1998	Tribenuron methyl technical: acute oral and contact toxicity to the honeybee, Apis mellifera L.
L5300-203	97.3	DuPont- 4059	2000	Tribenuron methyl technical (DPX-L5300): Acute toxicity to the earthworm, Eisenia fetida (Savigny) in artificial soil

Batch	Purity (%)	Study
63B3011159	98.30	In vitro 3T3 NRU phototoxicity
		test 2014 (Report No 260 TBM)
Lot 03PP	96.98	Used in local nymph node assay in
		mice 2010 (Report No 190 TBM
		amdt-1)
Lot 070708	97.38	used in Ames test 2009 (Report
		140965)

2 PROPOSED HARMONISED CLASSIFICATION AND LABELLING

2.1 Proposed harmonised classification and labelling according to the CLP criteria

Table 6:

					Classificat	tion		Labelling			
	Index No	International Chemical Identification	EC No	CAS No	Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Specific Conc. Limits, M-factors	Notes
Current Annex VI entry	607-177- 00-9	tribenuron-methyl (ISO); methyl 2-[N-(4- methoxy-6-methyl-1,3,5- triazin-2-yl)-N- methylcarbamoylsulfam oyl]benzoate	401-190-1	101200-48- 0	Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H317 H400 H410	GHS07 GHS09 Wng	H317 H410		M=100	
Dossier submitters proposal	607-177- 00-9	tribenuron-methyl (ISO); methyl 2-[N-(4- methoxy-6-methyl-1,3,5- triazin-2-yl)-N- methylcarbamoylsulfam oyl]benzoate	401-190-1	101200-48- 0	Skin Sens. 1 STOT RE 2 Aquatic Acute 1 Aquatic Chronic 1	H317 H373 H400 H410	GHS07 GHS08 GHS09 Wng	H317 H373 H410		M=100 M=100	
Resulting Annex VI entry if agreed by RAC and COM											

Hazard class	Reason for no classification	Within the scope of public consultation
Explosives	Data lacking	No
Flammable gases (including chemically unstable gases)	Hazard class not applicable	No
Oxidising gases	Hazard class not applicable	No
Gases under pressure	Hazard class not applicable	No
Flammable liquids	Hazard class not applicable	No
Flammable solids	Data is conclusive but not sufficient for classification.	Yes
Self-reactive substances	Data lacking	No
Pyrophoric liquids	Hazard class not applicable	No
Pyrophoric solids	Data (experience in handling) is conclusive but not sufficient for classification.	Yes
Self-heating substances	Data lacking	No
Substances which in contact with water emit flammable gases	Data (experience in handling) is conclusive but not sufficient for classification.	Yes
Oxidising liquids	Hazard class not applicable	No
Oxidising solids	Data lacking	No
Organic peroxides	Hazard class not applicable	No
Corrosive to metals	Data lacking	No
Acute toxicity via oral route	Conclusive but not sufficient for classification	Yes
Acute toxicity via dermal route	Conclusive but not sufficient for classification	Yes
Acute toxicity via inhalation route	Conclusive but not sufficient for classification	Yes
Skin corrosion/irritation	Conclusive but not sufficient for classification	Yes
Serious eye damage/eye irritation	Conclusive but not sufficient for classification	Yes
Respiratory sensitisation	Data lacking	No
Skin sensitisation	Harmonised classification proposed	Yes
Germ cell mutagenicity	Conclusive but not sufficient for classification	Yes
Carcinogenicity	Conclusive but not sufficient for classification	Yes
Reproductive toxicity	Conclusive but not sufficient for classification	Yes
Specific target organ toxicity- single exposure	Conclusive but not sufficient for classification	Yes
Specific target organ toxicity- repeated exposure	Harmonised classification proposed	Yes
Aspiration hazard	Data lacking	No
Hazardous to the aquatic environment	Harmonised classification proposed	Yes
Hazardous to the ozone layer	Hazard class not assessed in this dossier	No

Table 7: Reason for not proposing harmonised classification and status under public consultation

3 HISTORY OF THE PREVIOUS CLASSIFICATION AND LABELLING

Tribenuron-methyl has a harmonised classification in Skin sens. 1, Aquatic Acute 1 and Aquatic Chronic 1. This has been translated from the classification decided under the Dangerous Substances Directive 67/548/EEC where it was classified as Xi; R43, R50/53 by the ECB as presented in Commission Directive 2001/60/EC.

The substance was finally discussed at the Meeting of Technical Committee C&L on the Classification and Labelling of Dangerous Substances in Arona (21-24 September), 2004. In the final report (ECBI/139/04 Rev. 2) the above mentioned classification was agreed. In the discussions three member states expressed their opinion to classify for carcinogenicity (R40) but a major part of the Member States supported no classification and the TC C&L could then agree to this.

4 JUSTIFICATION THAT ACTION IS NEEDED AT COMMUNITY LEVEL

Tribenuron-methyl is an active substance in the meaning of Regulation EC 1107/2009 and justification is not required (Article 36 CLP Regulation).

5 IDENTIFIED USES

Tribenuron-methyl is an active substance used in plant protection products. It is used as an herbicide on a wide range of crops in EU Member States. The representative uses currently (re)-evaluated under EC Regulation 1107/2009 includes cereals (spring and winter), pasture, sun flower and olive.

6 DATA SOURCES

Tribenuron-methyl was included in Annex I of Directive 91/414/EC by Commission Directive 2005/54/EC of 19 September 2005. Entry into Force of Annex I listing was 1st of March 2006. Annex I listing was extended to 31 October 2017 according to Commission regulation No 533/2013 of 10 June 2013. Tribenuron-methyl is currently being evaluated under the following regulations for renewal of approval as an active substance in plant protection products:

• REGULATION (EC) No 1107/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 October 2009 concerning the placing of plant protection products on the market

• COMMISSION IMPLEMENTING REGULATION (EU) No 844/2012 of 18 September 2012 setting out the provisions necessary for the implementation of the renewal procedure for active substances, as provided for in Regulation (EC) No 1107/2009 of the European Parliament and of the Council concerning the placing of plant protection products on the market

• COMMISSION IMPLEMENTING REGULATION (EU) No 533/2013 of 10 June 2013 amending Implementing Regulation (EU) No 540/2011 as regards the extension of the approval periods of the active substances 1-methyl-cyclopropene, chlorothalonil, chlorotoluron, cypermethrin, daminozide, forchlorfenuron, indoxacarb, thiophanate-methyl and tribenuron-methyl

The data presented in this dossier has been submitted by the two applicants (DuPont de Nemours (Deutschland) GmbH and EU Tribenuron AIR 3 Task Force) as part of the renewal process. Some of the data was submitted and evaluated during the first approval (provided by DuPont only) while other data was submitted for the first time for the purpose of renewal of approval. All data is presented in the Renewal Assessment Report (RAR) prepared by Rapporteur Member State (RMS) Sweden which has been submitted to EFSA.

The RAR currently undergoes a peer-review process among the Member states and EFSA (to be completed in March-April 2017). The peer-review process permits the applicants to provide certain requested additional data during a stop-the-clock-period. Such data when relevant for this classification dossier has been incorporated where appropriate. In addition to this some corrections has been done to information provided for physical and chemical properties as compared to those presented in the RAR.

It is noted that there is also one active registrations under REACH. According to the file available on the ECHA website (https://echa.europa.eu/registration-dossier/-/registered-dossier/9259/5/3/2), this registration contains data on physical and chemical properties (appearance, melting point, boiling point, density, vapour pressure, partition coefficient, water solubility, solubility in organic solvents, surface tension and explosiveness), environmental fate (biodegradation in water: screening test), ecotoxicity (short-term toxicity to fish and short-term toxicity to aquatic invertebrates) and toxicity (oral, inhalative and dermal acute toxicity, repeated dose toxicity: other routes and genetic toxicity: in vitro). However, for all the data reported information on data source, materials and methods and applicant's summary and conclusion is lacking. The validity of the data can thus not be judged. Moreover, for the few tox data provided information on species is missing. In conclusion, since the reliability of the data cannot be judged and since it does not add much to the available file for tribenuron-methyl this additional data is not presented further herein.

General remark on reliability indicators

All studies referred to and used in this CLH-dossier have been submitted under the European regulatory framework for Plant Protection Products (see the references to the relevant Regulations above). Under that framework the study summaries should be submitted in the OECD format (Tier II summaries; see http://www.oecd.org/env/ehs/pesticides-biocides/oecdguidancedocumentsforpesticideregistration.htm), which does not include reporting of reliability indicators. However, the data requirements as well as the criteria for accepting studies are very strict for plant protection products. Moreover the data provided in this CLH-report has already been subject to a rigid peer-review process among the Member states and the European Food Safety Agency (EFSA). Hereby, the quality of the data used in this report corresponds to Klimish scores 1 or 2.

7 PHYSICOCHEMICAL PROPERTIES

Property	Value	Reference	Comment (e.g. measured or estimated)
Physical state at 20°C and 101,3 kPa	Solid (98-99%)	Jeffrey, D. J. (2000) Siripriya, G., (2014) DuPont-39970 Cowlyn, N. (2014) 288 TBM	
Melting/freezing point	Melting: 149.95°C (99.3%) Melting with decomposition: 137.9°C (98%)	Sundari, M.T (2013) DuPont-36467 Woolley, A. J., & O'Connor, B. J., (2009) 165 TBM	
Boiling point	Not applicable since the substance decomposes prior to boiling starting at 138 °C (98%) to 182.5°C (99.3%)	Sundari, M.T. (2013) DuPont-36467 Woolley, A. J., & O'Connor, B. J., (2009) 165 TBM	
Relative density	No data		

Table 8: Summary of physicochemical properties

Property	Value	Reference	Comment (e.g. measured or estimated)
Vapour pressure	5.99 x 10 ⁻⁹ Pa (99.3%) at 20 °C	Ganesh, M.U. (2013) DuPont-36468	Extrapolated from measurements at higher
	1.0 × 10 ⁻⁶ Pa (99.2%) at 25 °C	Cowlyn, N. (2014) 288 TBM	temperature (40-111°C).
	73.0 mN/m (90 % saturated solution, 19.6 ± 0.1°C, 97.4%)	Huntley, K. (2000) DuPont-3576	
Surface tension	71.0 mN/m (90 % saturated solution, 20°C, 99.2%)	Cowlyn, N. (2014a) 288 TBM	
	99.3%, 20 °C: Unbuffered distilled:	Siripriya, G. (2014) DuPont-39970	
	0.019 ± 0.002 g/L		
	pH 5, unstable pH 7, 2.483 ± 0.600 g/L		
Water solubility	pH 9, >17.85 g/L		
	99.2%, 20 °C: Unbuffered distilled: 278 mg/L pH 7, 1660 mg/L pH 10, > 250 g/L	Cowlyn, N. (2014) 288 TBM	
	20°C (99.3%): Distilled water: log Pow = 0.85 ± 0.03	Pakki, U.V.S. (2013) DuPont-36463	
	pH 7.0 (phosphate buffer): log Pow = - 0.38 ± 0.01		
	pH 9 (borate buffer): log Pow = -0.93 ± 0.01		
Partition coefficient n- octanol/water	20°C (99.2%):	Cowlyn, N., 2014	
	pH 4 orthophosphate buffer:	(288 TBM)	
	$\log P = 2.0$		
	pH 7.0 orthophosphate buffer:		
	logP = -0.46		
	pH 10.0 borate buffer: logP = -2.22		
Flash point	Not applicable. The active substance is a solid; its melting point is > 40 °C.		
Flammability	Not highly flammable (97.8%)	Gravell, R. L. (1999) DuPont-2443	

Property	Value	Reference	Comment (e.g. measured or estimated)
Explosive properties	Not explosive (97.8%)	Gravell, R. L. (1999) DuPont-2443	
Self-ignition temperature	No self-ignition up to 400°C (97.8%)	Gravell, R. L. (1999) DuPont-2443	
Oxidising properties	Not oxidizing under the conditions of the test (99.3%)	Loganayagi, C. (2013) DuPont-36465	
Granulometry	No data		
Stability in organic solvents and identity of relevant degradation products	No data		
Dissociation constant	pKa = 4.65 ± 0.20 at 20°C (99.3%) pKa = 4.6 at 20°C (99.2%)	Piriyadarsini, J.R. (2013) DuPont-36464 Cowlyn, N. (2014) 288 TBM	
Viscosity	Not relevant since the substance is a solid with a melting point >> 40 °C.		

8 EVALUATION OF PHYSICAL HAZARDS

8.1 Explosives

Table 9: Summary table of studies on explosive properties

Method	Results	Remarks	Reference
EEC A.14	EC A.14 Not explosive (97.8% purity)		Gravell, R. L., (1999)
			DuPont-2443

8.1.1 Short summary and overall relevance of the information provided on explosive properties

One negative study performed in accordance with EEC A.14 is available. It could also be added that the substance does not contain any functional groups known to confer explosive properties.

8.1.2 Comparison with the CLP criteria

It is not evident from the CLP-guidance that a negative result from the EEC A.14-test automatically means that it should not be classified as an explosive under CLP. Nevertheless, based on the structure, it seems that the waiving criteria for non-testing applies and a classification is thus not warranted.

8.1.3 Conclusion on classification and labelling for explosive properties

No classification is proposed due to lack of data.

8.2 Flammable gases (including chemically unstable gases)

Hazard class not applicable (tribenuron-methyl is not a gas).

8.3 Oxidising gases

Hazard class not applicable (tribenuron-methyl is not a gas).

8.4 Gases under pressure

Hazard class not applicable (tribenuron-methyl is not a gas).

8.5 Flammable liquids

Hazard class not applicable (tribenuron-methyl is not a liquid).

8.6 Flammable solids

Table 10: Summary table of studies on flammable solids

Method	Results	Remarks	Reference
EEC A.10	Not highly flammable (97.8% purity)	The substance did not support combustion in the initial screening test	Gravell, R. L., (1999) DuPont-2443

8.6.1 Short summary and overall relevance of the provided information on flammable solids

One test performed in accordance with EEC A.10 is available. The substance did not ignite in the preliminary screening test and is thus not regarded a highly flammable in the sense of the test method.

8.6.2 Comparison with the CLP criteria

The preliminary screening test in EEC A.10 and in CLP are identical. The substance should thus not be classified as a flammable substance under CLP.

8.6.3 Conclusion on classification and labelling for flammable solids

No classification is proposed. Data is conclusive but not sufficient for classification.

8.7 Self-reactive substances

Data lacking.

8.7.1 Short summary and overall relevance of the provided information on self-reactive substances

No data has been provided addressing this property.

8.7.2 Comparison with the CLP criteria

No data has been provided that addresses this property. However, the structure of tribenuron-methyl does not contain any functional groups known to confer self-reactive properties (compared with Tables A6.1 and A6.2 in Appendix 6 to UN-MTC). It contains the structural feature S=O (Table A6.2) but none of the functional groups given in the examples. The waiving criteria in CLP therefore applies and no classification for self-reactive properties is warranted.

8.7.3 Conclusion on classification and labelling for self-reactive substances

No classification is proposed due to lack of data.

8.8 Pyrophoric liquids

Hazard class not applicable (tribenuron-methyl is not a liquid).

8.9 Pyrophoric solids

Data lacking.

8.9.1 Short summary and overall relevance of the provided information on pyrophoric solids

No specific data derived in accordance with the recommended test method in CLP is available. However, tribenuron-methyl has been handled in air within all studies available in the dossier and there are no reports of self-ignition (see references in all sections).

8.9.2 Comparison with the CLP criteria

Based on experience in handling of tribenuron-methyl, it is not a pyrophoric solid (compare with example in CLP guidance section 2.10.7.2).

8.9.3 Conclusion on classification and labelling for pyrophoric solids

No classification is proposed. Data (experience in handling) is conclusive but not sufficient for classification.

8.10 Self-heating substances

Table 11: Summary table of studies on self-heating substances

Method	Results	Remarks	Reference
EEC A.16	No self-ignition up to 400°C		Gravell, R. L.,
			(1999)
			DuPont-2443

8.10.1 Short summary and overall relevance of the provided information on self-heating substances

One negative study conducted in accordance with EEC A.16 is available.

8.10.2 Comparison with the CLP criteria

Since no study has been provided in accordance with the recommended test method in CLP a full assessment cannot be made.

8.10.3 Conclusion on classification and labelling for self-heating substances

No classification is proposed due to lack of data (generated in accordance with the recommended test method in CLP).

8.11 Substances which in contact with water emit flammable gases

Data lacking.

8.11.1 Short summary and overall relevance of the provided information on substances which in contact with water emit flammable gases

No specific data derived in accordance with the recommended test method in CLP has been provided. However, tribenuron-methyl has been handled in water within many of the studies available in the dossier and there are no reports of violent reaction and emission of gas.

8.11.2 Comparison with the CLP criteria

Based on experience in handling of tribenuron-methyl, it is not a substance which in contact with water emit flammable gases (compare with CLP guidance section 2.12.3.2).

8.11.3 Conclusion on classification and labelling for substances which in contact with water emit flammable gases

No classification is proposed. Data (experience in handling) is conclusive but not sufficient for classification.

8.12 Oxidising liquids

Hazard class not applicable (tribenuron-methyl is not a liquid).

8.13 Oxidising solids

Table 12: Summary table of studies on oxidising solids

Method	Results	Remarks	Reference	
EEC A.17	Not oxidizing in the sense of the	The test	Loganayagi,	C.
	test method. The maximum	item:cellulose 1:1	(2013)	
	burning rate of the reference	and 4:1 mixtures	DuPont-36465	
	(barium nitrate):cellulose mixture	also burned to		
	(3:2) was higher $(0.62 mm/s)$ than	completion.		
	the maximum burning of the test			
	item: cellulose mixture (1:9; 0.42			
	mm/s)			

8.13.1 Short summary and overall relevance of the provided information on oxidising solids

One test performed in accordance with EEC A.17 is available. The test was negative in the sense of the test method but all tested test item:cellulose mixtures (1:9, 1:4, 3:7, 2:3, 1:1, 3:2, 7:3, 4:1 and 9:1) burned to completion.

8.13.2 Comparison with the CLP criteria

The test under EEC A.17 does not utilize the same reference standard as in the test recommended under CLP (potassium bromate). Moreover, the decision logic in CLP stipulates that the reference:cellulose mixture should also be tested in 3:7 and 2:3 ratios whereas in EEC A.17 only a 3:2 mixture could be used as in this case. Hereby, the decision logic cannot be followed and it cannot be fully concluded that the test substance is not an oxidizer under CLP.

In addition, it should be noted that the waiving criteria does not apply since the substance contains oxygen not only chemically bonded to carbon or hydrogen (i.e. it contains a sulfonyl-group).

8.13.3 Conclusion on classification and labelling for oxidising solids

No classification is proposed due to lack of data.

8.14 Organic peroxides

Hazard class not applicable (tribenuron-methyl is not an organic peroxide).

8.15 Corrosive to metals

No data has been provided addressing this property.

8.15.1 Short summary and overall relevance of the provided information on the hazard class corrosive to metals

No data has been provided addressing this property. Tribenuron-methyl does contain acidic or basic functional groups (pka=4.6-4.7) and should thus be considered for classification in this class according to the CLP-guidance. However, the substance is a high melting substance which also means that it is currently difficult to test with the available test method.

8.15.2 Comparison with the CLP criteria

No data has been provided and a thorough assessment can thus not be made.

8.15.3 Conclusion on classification and labelling for corrosive to metals

No classification is proposed due to lack of data.

9 TOXICOKINETICS (ABSORPTION, METABOLISM, DISTRIBUTION AND ELIMINATION)

Table 13: Summary table of toxicokinetic studies

Method/Route/Species/Strain/Sex/ No. per dose/Test substance/dose	Results	Remarks	Reference
OECD TG 417	Absorption is 67 % (% metabolites in the	-	RAR Vol.
Oral (gavage)	urine). Note: No bile cannulated rats.		3
Rat	Tribenuron-methyl is rapidly metabolised.		B.6.1.1/01
Crl:CD [®] BR	Major urinary metabolites is metsulfuron methyl, saccharin and o-demethyl triazine		
5 M, 5 F (kinetic studies)	amine.		Key study
5 M, 5 F (metabolism studies)	Tribenuron-methyl did not accumulate in any tissue.		
[Phenyl- ¹⁴ C(U)] tribenuron-methyl and [Triazine-2- ¹⁴ C] tribenuron-methyl	67 % was excreted via urine.		
~20 mg/kg bw (low-dose) and ~1700-2000 mg/kg bw (high-dose)			
96 and 168 hour			

M: males

F: females

9.1 Short summary and overall relevance of the provided toxicokinetic information on the proposed classification(s)

Absorption: 67 % of the administered doses.

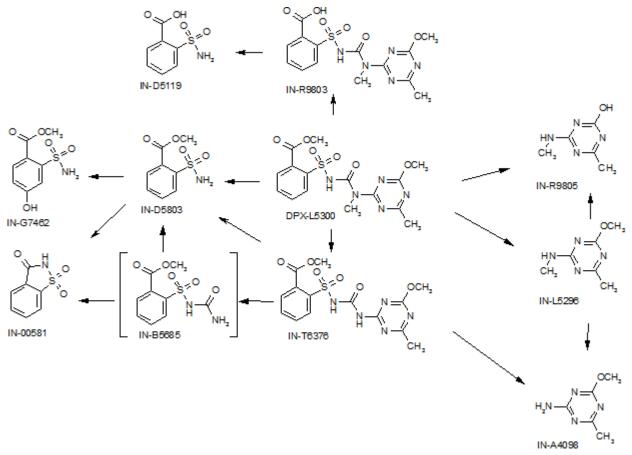
<u>Metabolite profile</u>: Tribenuron-methyl was extensively and rapidly metabolised in rats of both sexes and under all dosing regimens. Less than 10 percent of the total dose was recovered as intact tribenuron-methyl in the urine or faeces. Major urinary metabolites were identified as DPX-T6376 (metsulfuron methyl), IN-R9803 (tribenuron-methyl free acid), IN-00581 (saccharin), IN-G7462 (hydroxylated sulphonamide), and IN-R9805 (o-demethyl triazine amine). Minor metabolites included IN-D5119 (acid sulphonamide), IN-L5296 (triazine amine) and IN-A4098 (n-demethyl triazine amine), and IN-D5803 (sulphonamide). All metabolites were found in animals of both sexes. IN-B5685 was observed as a minor metabolite of DPX-T6376 (metsulfuron methyl) in a previous rat metabolism study (Metsulfuron methyl 7593/VI/97 – final 14 August 2000 EU review report, http://europa.eu.int/comm/food/fs/ph_ps/pro/eva/existing/list1-13_en.pdf) and is included in the proposed metabolic pathway as a plausible, but transient metabolite of tribenuron-methyl. For the major metabolites, urine profiles did not change after glucuronidase/sulfatase incubation indicating that glucuronide or sulfate conjugation was not significant.

<u>Distribution:</u> Tribenuron-methyl was not accumulated in any tissue. The major metabolites found in the urine were metsulfuron methyl, saccharin and O-demethyl triazine in both sexes and were the result of N-demethylation, de-esterification, hydrolysis of the sulfonylurea bridge, hydroxylation of the phenyl ring, and/or O-demethylation of the triazine ring. In the female rats hydroxylated sulfonamide was also found. Quantitatively, there were some differences between the sexes and doses and between the urinary and faecal metabolites. However, the major metabolites were found equally in both sexes and doses in urine and faeces.

<u>Excretion</u>: Tribenuron-methyl was primarily excreted *via* urine, with urinary excretion averaging two to four time's faecal excretion for all groups and both sexes. 67% was found in the urine and approximately 5% or less unmetabolised substance was found in faeces. The excretion rate of tribenuron-methyl was slower in the high-dose group compared to the low-dose animals, especially in female rats. The total excretion after 168 hours was greater than 97%. The estimated half-life for the high-dose was below 54 hours for males and 96 hours for females. The low-dose groups had shorter half-lives, 26 to 33 hours for males and females.

The metabolism pathway proposed in mammals is given in the following scheme. The postulated intermediates are shown in brackets.

Figure: Proposed metabolic pathway of tribenuron-methyl in mammals



10 EVALUATION OF HEALTH HAZARDS

Acute toxicity

10.1 Acute toxicity - oral route

Table 14: Summary table of animal studies on acute oral toxicity

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance, Vehicle	Dose levels, duration of exposure	Value LD50	Reference
Acute oral OECD TG 401	Rat Crl:CD [®] (SD)IGS BR 5/sex/dose	Tribenuron- methyl technical Purity: 97.8% Vehicle: Corn oil	5000 mg/kg bw Observations in 14 days	>5000 mg/kg bw	RAR Vol. 3 B.6.2.1/01 Key study

Table 15: Summary table of human data on acute oral toxicity

No data.

Table 16: Summary table of other studies relevant for acute oral toxicity

No data.

10.1.1 Short summary and overall relevance of the provided information on acute oral toxicity

An acute oral toxicity study was conducted according to GLP and OECD TG 401. Single doses of the test substance suspended in Mazola[®] corn oil were administered to fasted rats at a dosage of 5000 mg/kg bw and were then observed for 14 days. Male rats exhibited no clinical signs of toxicity during the study, while one female showed a red-stained face day 2. Other clinical signs observed in the four other females started from day 8 and included red-stained head, hunched over posture, and ruffled fur. No clinical signs were observed after day 10. No body weight losses occurred in male rats. Weight loss up to 9 % from day 2 until day 11 was registered in females. However, the final body weight of all female rats surpassed their fasted body weight. No gross lesions were present in the rats at necropsy. The oral LD₅₀ for male and female rats was >5000 mg/kg bw.

10.1.2 Comparison with the CLP criteria

According to the CLP Guidance, classification in Acute Tox. 4 (the lowest classification) is required for substances with oral LD_{50} of 300-2000 mg/kg bw. The LD_{50} for oral toxicity was above 2000 mg/kg bw and tribenuron-methyl thus does not fulfil the classification criteria for acute oral toxicity.

10.1.3 Conclusion on classification and labelling for acute oral toxicity

No classification is proposed for tribenuron-methyl.

10.2 Acute toxicity - dermal route

Table 17: Summary table of animal studies on acute dermal toxicity

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance,	Dose levels duration of exposure	Value LD ₅₀	Reference
Acute dermal OECD TG 402	Rat Crl:CD [®] (SD)IGS BR, 5/sex/dose	Tribenuron- methyl technical Purity: 97.7%	5000 mg/kg bw Observations in 14 days	>5000 mg/kg bw	RAR Vol. 3 B.6.2.2
					Key study

Table 18: Summary table of human data on acute dermal toxicity No data.

Table 19: Summary table of other studies relevant for acute dermal toxicity

No data.

10.2.1 Short summary and overall relevance of the provided information on acute dermal toxicity

An acute dermal toxicity study was conducted according to GLP and OECD TG 401. No treatment related mortality was observed and no clinical signs of toxicity were observed during the study. However, several

rats exhibited wet or yellow-stained perineum, swollen face or legs, ocular or nasal discharge, or stained fur on the day of and the day after application of the test substance. Six rats exhibited no erythema or oedema during the study. Mild and/or moderate erythema was observed in four rats and one rat exhibited mild oedema. Focal eschar, desquamation, hyperkeratosis and epidermal scaling were also observed during the study. No dermal effects were observed after day 13. Weight loss of approximately 4-10% of initial body weight was observed in the rats the day after application. However, these clinical signs and the weight loss were considered to be due in part to the wrapping procedure. No gross lesions were present in the rats at necropsy. The dermal LD₅₀ for male and female rats was >5000 mg/kg bw.

10.2.2 Comparison with the CLP criteria

According to the CLP Guidance, classification in Acute Tox. 4 (the lowest classification) is required for substances with dermal LD_{50} of 1000-2000 mg/kg bw. The LD_{50} for dermal toxicity was above 2000 mg/kg bw, and tribenuron-methyl thus does not fulfil the classification criteria for acute dermal toxicity.

10.2.3 Conclusion on classification and labelling for acute dermal toxicity

No classification is proposed for tribenuron-methyl.

10.3 Acute toxicity - inhalation route

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance, form and particle size (MMAD)	Dose levels, duration of exposure	Value LC ₅₀	Reference
Acute inhalation OECD TG 403	Rat Crl:CD [®] (SD)IGS BR 5/sex/dose	Tribenuron-methyl technical, fine powder Purity: 97.7% (MMAD 2.8 or 2.7 µm)	6.0 mg/L, 4 hour, nose only 14 days observation	>6.0 mg/L	RAR Vol. 3 B.6.2.3/01 Key study

 Table 2010: Summary table of animal studies on acute inhalation toxicity

Table 21: Summary table of human data on acute inhalation toxicity No data.

Table 22: Summary table of other studies relevant for acute inhalation toxicity

No data.

10.3.1 Short summary and overall relevance of the provided information on acute inhalation toxicity

An acute inhalation toxicity study was conducted according to GLP and OECD TG 403. Five rats/sex/group were exposed to an atmosphere of tribenuron-methyl in air for a single 4-hours period. The rats were observed

for mortality and clinical signs of toxicity immediately after they were removed from the restraints following exposure. All rats were observed for mortality daily, and were weighed and observed for clinical signs of toxicity 1-4 times a week during a 14-days post exposure period. At the end of the period, all rats were sacrificed by carbon dioxide asphyxiation and subjected to gross pathological examination. No animals died during exposure, or during the 14-days recovery period. All rats showed a slight body weight loss the day following exposure. In male rats a body weight loss of 0.35 - 4% of the initial weight was observed, and in female rats 1.0 - 2.0%. All rats showed an overall weight gain by the end of the 14-days recovery period. No clinical signs were observed during the recovery period, except for eye, nasal and/or oral discharges, irregular respiration and stained fur immediately after exposure. Gross pathological examination revealed no evidence of organ-specific toxicity at the end of the recovery period. The LC₅₀ was considered to be greater than 6.0 mg/l for both sexes.

10.3.2 Comparison with the CLP criteria

According to the CLP Guidance, classification in Acute Tox. 4 (the lowest classification) is required for substances with an inhalation LC_{50} of 1.0-5.0 mg/L. The LC_{50} for inhalation toxicity was greater than 6.0 mg/l for both sexes, tribenuron-methyl thus does not fulfil the classification criteria for acute inhalation toxicity.

10.3.3 Conclusion on classification and labelling for acute inhalation toxicity

No classification is proposed for tribenuron-methyl.

10.4 Skin corrosion/irritation

Table 23: Summary table of animal studies on skin corrosion/irritation

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance,	Dose levels duration of exposure	Results - Observations and time point of onset - Mean scores/animal - Reversibility	Reference
Dermal irritation OECD TG 404	Rabbit New Zealand White 6 males	Tribenuron- methyl technical Purity: 95.8%	0.5 g/animal, 4 hours	One of six rabbit exhibited erythema, but no oedema 1 hour after patch removal (mean score 0.17). No dermal irritation was observed throughout the remainder of the study.	RAR Vol. 3 B.6.2.4/01 Key study

Table 24: Summary table of human data on skin corrosion/irritation

No data.

Table 25: Summary table of other studies relevant for skin corrosion/irritation

No data.

10.4.1 Short summary and overall relevance of the provided information on skin corrosion/irritation

In a study performed in accordance with GLP and OECD TG 404, 6 male New Zealand White rabbits each received dermal treatments with 0.5 g of tribenuron-methyl for 4 hours under occlusive conditions. Approximately 1 hour after removal of the test patches, the test sites were evaluated for erythema, oedema, and other evidence of dermal effects and were scored according to the Draize scale. Additional evaluations were made at approximately 24, 48 and 72 hours after removal of the patches. The adjacent areas of untreated skin were used for comparison. No dermal irritation was observed in 5 rabbits during the study. One rabbit exhibited erythema, but no oedema 1 hour after patch removal. No dermal irritation was observed throughout the remainder of the study. No adverse clinical signs of toxicity were observed in any of the rabbits during the study. One rabbit exhibited weight loss of approximately 9% of initial body weight by day 3 after application of the test substance.

10.4.2 Comparison with the CLP criteria

According to the CLP Guidance Table 3.2.2, a substance should be classified in Category 2 (Irritant) if:

"-mean value of $\geq 2.3 - \leq 4.0$ for erythema/eschar or for oedema in at least 2 of 3 tested animals from gradings at 24, 48 and 72 hours after patch removal or, if reactions are delayed, from grades on 3 consecutive days after the onset of skin reactions; or

-inflammation that persists to the end of the observation period normally 14 days in at least 2 animals, particularly taking into account alopecia (limited area), hyperkeratosis, hyperplasia, and scaling; or

In some cases where there is pronounced variability of response among animals, with very definite positive effects related to chemical exposure in a single animal but less than the criteria above"

In the skin irritation test conducted with tribenuron-methyl no oedema/eschar was noted, and the mean value for erythema was below 2.3. Furthermore, no inflammation persisted to the end of the observation period. Thus, tribenuron-methyl does not fulfil the classification criteria for skin irritation.

10.4.3 Conclusion on classification and labelling for skin corrosion/irritation

No classification is proposed for tribenuron-methyl.

10.5	Serious	eye damage/	eye irritation
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1 able 26: Summary t	table of animal studies o	on serious eye da	mage/eye irritation

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance	Dose levels duration of exposure	Results - Observations and time point of onset - Mean scores/animal - Reversibility	Reference
Eye irritation OECD TG 405	Rabbit New Zealand White 6 males	Tribenuron- methyl technical Purity: 96.6%	50 mg/animal Examination after 1, 24, 48 and 72 hours	Slight effects on the corneal opacity were seen in two rabbits (mean score of 0.33 at 1-hour), mild conjunctival redness (maximum score of 1) in six rabbits and slight chemosis (mean score of 0.67 at 1 hour) in four rabbits. Biomicroscopic examinations were negative for corneal injury in all treated animals throughout the study. The treated eyes of all animals were normal 72 hours after treatment.	RAR Vol. 3 B.6.2.5/01 Key study

Table 27: Summary table of human data on serious eye damage/eye irritation

No data.

Table 28: Summary table of other studies relevant for serious eye damage/eye irritation

No data.

10.5.1 Short summary and overall relevance of the provided information on serious eye damage/eye irritation

In a study performed in accordance with GLP and OECD TG 405, 0.1 ml of tribenuron-methyl was placed in the lower conjunctival sac of the right eye of 6 male rabbits. The other eye served as control. Treated and control eyes remained unwashed. The eyes were examined at 1, 24, 48 and 72 hours using illumination and magnification and were scored for ocular reactions using the Draize scale. Slight effects on the corneal opacity (score of 1 at 1-hour) were seen in two rabbits, mild conjunctival redness (maximum score of 1) in six rabbits and slight chemosis (score of 1 at 1-hour) in four rabbits. No effects on iris were noted. Biomicroscopic examinations were negative for corneal injury in all treated animals throughout the study. The treated eyes of all animals were normal 72 hours after treatment.

10.5.2 Comparison with the CLP criteria

According to the CLP Guidance Table 3.3.2, a substance should be classified in Category 2 (Irritating to eyes) *"If it produces, at least in 2/3 animals, a positive response of:*

-corneal opacity ≥ 1 and/or

-iritis $\geq l$, and/or

-conjunctival redness ≥ 2 and/or

-conjunctival oedema (chemosis) ≥ 2

calculated as the mean scores following grading at 24, 48 and 72 hours after installation of the test material, and which fully reverses within an observation period of 21 days"

In the eye irritation test conducted with tribenuron-methyl mean scores for corneal opacity did not exceed 1, and mean scores for conjunctival oedema or redness did not exceed 2. Furthermore, no effects were noted in iris and no effects persisted to the end of the observation period. Thus, tribenuron-methyl does not fulfil the classification criteria for eye irritation.

10.5.3 Conclusion on classification and labelling for serious eye damage/eye irritation

No classification is proposed for tribenuron-methyl.

10.6 Respiratory sensitisation

No data.

10.6.1 Short summary and overall relevance of the provided information on respiratory sensitisation

No data.

10.6.2 Comparison with the CLP criteria

Not relevant as no data are available.

10.6.3 Conclusion on classification and labelling for respiratory sensitisation

Not relevant as no data are available.

10.7 Skin sensitisation

Table 29: Summary table of animal studies on skin sensitisation

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance	Dose levels, duration of exposure	Results	Reference
Buehler method OECD TG 406 except that 0.3% DNCB was used as the positive control	Guinea pig Dunkin- Hartley albino 10 animals of each sex in treatment group and 5 in control	Tribenuron- methyl technical Purity: 96.6%	Induction: 0.25 g/animal (62.5 %) Challenge: 0.25 g/animal (62.5 %)	A sensitisation rate of 20% and 60% after 24 and 48 hours, respectively after the first challenge, and of 10% after the second challenge	RAR Vol. 3 B.6.2.6/01 Key study

Method, guideline, deviations if any	Species, strain, sex, no/group	Test substance	Dose levels, duration of exposure	Results	Reference
Magnusson and Kligman maximization test OECD TG 406 except no positive control	Guinea pig Dunkin- Hartley guinea females 10 control and 20 in treatment group	Tribenuron- methyl technical Purity: 95%	Induction: 2 % Challenge: 5- 50 %	50% tribenuron- methyl administered epicutaneously in the challenge phase, induced positive skin reactions in 17 of the 19 animal. Positive reactions to the 20% concentration were seen in 9 of 19 animals.	RAR Vol. 3 B.6.2.6/03 Key study
Local Lymph Node Assay OECD TG 429 Probably a higher concentration should have been tested.	Mouse CBA/J females 5/group	Tribenuron- methyl Technical Purity: 97.1%	5, 10 and 20 % 3 days	Stimulation Indices (SI) were <1.5 for all groups. However, it seems like a higher concentration should have been tested in order to get a reliable result.	RAR Vol. 3 B.6.2.6/04

Table 30: Summary table of human data on skin sensitisation

No data.

Table 31: Summary table of other studies relevant for skin sensitisation

No data.

10.7.1 Short summary and overall relevance of the provided information on skin sensitisation

The skin sensitisation potential of tribenuron-methyl was assessed in two studies in the guinea pig (Buehler method and Magnusson and Kligman maximisation test), and in one Local Lymph Node Assay in the mouse. Tribenuron-methyl was negative in the Local Lymph Node Assay but it might be due to the fact that the concentration tested was not high enough. In the other two reliable studies tribenuron-methyl was found to be positive.

Local Lymph Node Assay: Method:

Preliminary toxicity testing:

Concentrations of 5, 10 and 20 % were tested to determine the highest dosable level that avoids overt systemic toxicity and excessive local irritation. Each group consisted of three mice and the vehicle control was propylene glycol. The highest dosable concentration was determined to be a 20 % w/w mixture in propylene glycol, therefore, the test substance as 5, 10 and 20 % w/w mixtures in propylene glycol were selected in the main study.

Main study:

Groups of five female mice were subjected to topical applications of vehicle control (propylene glycol - PG), positive control (α -hexylcinnamaldehyde) or one of the test formulations (5, 10 or 20% in PG) to the dorsum of both ears of each mouse once a day for three consecutive days. On day 6, a 20 μ Ci dose of 3H-thymidine was injected intravenously into each animal. Five hours later the auricular lymph nodes were recovered from each animal, pooled for each individual mouse and processed through a scintillation counter. Test results are

expressed in terms of Stimulation Indices (SI) with the threshold level to be considered a positive indicator of the potential to cause skin sensitisation being 3.0. All results were <3.0. A positive response (SI: 5.03) was observed in animals that received the concurrent positive control.

Buehler method:

Method:

A primary irritation test was run to decide what vehicle and test substance concentrations to be used. Concentrations of 5, 10 and 25% (the maximal practical test concentration based on solubility) suspensions of the test material in dimethyl phthalate were applied onto the shaved, intact skin of 2 male and 2 female guinea pigs. The main study comprised two phases: one induction phase and a challenge phase. The induction phase (dermal application) was performed once a week for 3 consecutive weeks, for a total of three 6-hour treatments with 0.4 ml test material (equivalent to approximately 0.25 g). That is a 62.5 % concentration. Following the same procedure, vehicle control animals were treated with the same amount of DMP (dimethyl phthalate) vehicle, and a positive control with DNCB (0.3% 1-chloro-2,4-dinitrobenzene). After an approximately 6-hour exposure period, the bandages and patches were removed from the animals and the test sites were washed with warm water to remove excess test material. The challenge was carried out two weeks after the last induction treatment. The same amount of test substance as used in the induction phase, was applied to unexposed and shaved skin for 6 hours. The challenge phase followed the same exposure protocol as the induction phase. The irritation responses were scored approximately 24 and 48 hours after treatment. Vehicle control animals and positive control animals were challenged after the same protocol as the treatment group. Evaluations of the skin reactions were performed 24 and 48 hours after removal of the patches. One week following the challenge phase, the test guinea pigs were rechallenged for sensitisation. The positive control and the vehicle control animals were not rechallenged. **Results**:

<u>Range finding study</u>: Slight patchy erythema was observed in 2 of the 25% concentration sites 24 hours after treatment. No other dermal irritation was observed.

<u>Main study</u>: The test substance diluted in DMP and administered epicutaneously to guinea pigs in the first challenge phase, induced slight to moderate patchy response in 4/20 animals (20%) of the test group after 24 hr and in 12/20 animals (60%) after 48 hr. Following rechallenge a slight to moderate patchy response was recorded in 2/20 animals (10%) after 24 and 48 hours. In the vehicle control group only one animal was recorded with a slight patchy response after 48 hours in the first challenge. The positive control however, showed a moderate to severe skin reaction in all animals after both 24 and 48 hr (this group was not rechallenged).

Magnusson and Kligman Maximisation Test:

Method: A primary irritation test was run to decide what vehicle and test substance concentrations to be used. Primary irritation experiments included intracutaneous injections of a 4% (w/v) dilution of the test substance in acetone, using a single animal and epicutaneous applications of dilutions of the test substance in corn oil: 50%, 25%, 10% and 5% (w/v) using four animals. The main study comprised two phases: one induction phase and a challenge phase. Day 0 of the study, three pairs of intra dermal injections were performed (Injection 1: 0.1 ml test substance (2% w/v in acetone); Injection 2: 0.1 ml of Freunds Complete Adjuvant and water (1:1); Injection 3: 0.1 ml test substance (4% w/v) in acetone and Freunds Complete Adjuvant (1:1)) within a 2 cm x 4 cm clipped area on the animals shoulder. Control animals received the same treatment, but with injections only consisting of vehicle where test substance had been used in the treatment group. Day 6 the skin of the shoulder area was treated with 10% sodium dodecyl sulphate to create a mild irritation. Day 7 the same area was clipped again and 0.5 ml of the test substance in propylene glycol, was applied to the shoulder skin and covered by a patch for 48 hours. Again the control group were treated the same way, but only with vehicle. The challenge was carried out on day 21. The test substance was applied to the skin, and each animal received 4 different doses of test substance (0, 5, 20 and 50% w/v test substance) in propylene glycol. The test substance was covered with a patch and kept on for 24 hours. Control animals were challenged with vehicle only after the same protocol as the treatment group. Evaluations of the skin reactions were performed 24 and 48 hours after removal of the patches.

Results:

<u>Primary irritation experiments</u>: Intradermal administration produced necrosis to an acceptable extent, while epicutaneous application produced very slight erythema at the site treated with the 50% dilution with three of the four treated animals.

<u>Main study</u>: The test substance diluted to 50% (w/v) in propylene glycol and administered epicutaneously to guinea pigs in the challenge phase, induced positive skin reactions in 17 of the 19 surviving animals (89%) in the treatment group. Positive reactions to the 20% concentration were seen in 9 of the 19 animals (47%). All control animals were negative and showed no skin reactions.

10.7.2 Comparison with the CLP criteria

According to CLP Regulation 3.4.2.2.4, a response of at least 30% of the animals is considered as positive when an adjuvant type guinea pig test method for skin sensitisation is used. In the study performed with tribenuron-methyl, where Magnusson and Kligman maximization test was used, the induction concentration of 2 % resulted in a sensitisation rate of 89% and 47% after a challenge with 50% and 20% test substance respectively. Thus, tribenuron-methyl fulfils the criteria and should be classified as a skin sensitiser.

According to CLP Regulation 3.4.2.2.4, a response of at least 15% of the animals is considered as positive when a non-adjuvant guinea pig test method is used. In the study performed with tribenuron-methyl, where Buehler method was used, the sensitisation rate was 20% and 60% after 24 and 48 hours respectively after the first challenge, and 10% after the second challenge. Thus, tribenuron-methyl fulfils the criteria and should be classified as a skin sensitiser.

The CLP Regulation allows classification of skin sensitisers in one hazard category, Category 1, which comprises two sub-categories, 1A and 1B. Classification into sub-categories is only allowed if data are sufficient (CLP Annex I, 3.4.2.2.1.1). Therefore care should be taken when classifying substances into Category 1B when Category 1A cannot be excluded. In such cases classification into category 1 should be considered. This is particularly important if only data are available from certain tests showing a high response after exposure to a high concentration but where lower concentrations which could show the presence of such effects at lower doses are absent (in line with some test protocols where a maximised dose should be used). The criteria for sub-categorisation based on results from Guinea pig maximisation tests and Buehler assays are given in table below:

Table 32: Criteria for sub-categorisation based on results from Guinea pig maximisation tests and Buehler assays

Sub-category	Assay	Response
1A	Guinea Pig Maximisation Test	\geq 30% responding at \leq 0.1% intradermal induction dose or \geq 60% responding at $>$ 0.1% to \leq 1% intradermal induction dose
1A	Buehler assay	≥15% responding at ≤0.2% topical induction dose or ≥60% responding at >0.2% to ≤20% topical induction dose
1B	Guinea Pig Maximisation Test	\geq 30% to <60% responding at >0.1% to \leq 1% intradermal induction dose or

		≥30% responding at >1% intradermal induction dose
1B	Buehler assay	\geq 15% to <60% responding at >0.2% to \leq 20% topical induction dose or \geq 15% responding at >20% topical induction dose

According to table above, tribenuron-methyl fulfils the criteria for subcategorisation in category 1B (Guinea Pig Maximisation Test: \geq 30% responding at >1% intradermal induction dose; Buehler Method: \geq 15% responding at >20% topical induction dose). However, the Guidance on the application of the CLP criteria, section 3.4.2.2.2, states that subcategorization in 1B is only allowed if category 1A can be excluded. For tribenuron-methyl, there is a very high response rate (89%) following the use of an intradermal induction dose of 2%. It is therefore possible that the use of a lower dose would result in a response rate which fulfils the criteria for category 1A. Subcategorisation of tribenuron-methyl is therefore not proposed.

10.7.3 Conclusion on classification and labelling for skin sensitisation

Tribenuron-methyl has a harmonised classification as a skin sensitiser (Skin Sens. 1, H317). No change is proposed.

10.8 Germ cell mutagenicity

Table 33: Summary table of mutagenicity/genotoxicity tests in vitro

Method, guideline, deviations if any	Test substance	Relevant information about the study including rationale for dose selection (as applicable)	Observations	Reference
Mutagenicity testing in the Salmonella typhimurium plate incorporation assay OECD TG 471 with some deviations (the number of S. typhimurium strains used was four instead of five). Possible oxidising mutagens and cross-link mutations were not examined in this study.	Tribenuron- methyl technical Purity: 94%	Without activation: 0, 5, 10, 50, 100 and 500 µg/plate. With activation: 0, 10, 50, 100, 500, 1000 and 2000 µg/plate.	Cytotoxicity was observed at \geq 500 µg/plate in absence of an activation system and at >1000 µg/plate in the presence of S-9 mix. No significant increases in revertants were observed and there were no significant positive linear dose responses. Tribenuron-methyl was non-mutagenic.	RAR Vol. 3 B.6.4.1/01 Key study
Tribenuron-methyl Reverse mutation assay "Ames Test" using Salmonella Typhimurium and Escherichia Coli OECD TG 471	Tribenuron- methyl technical Purity: 97.38%	15, 50, 150, 500, 1500, 5000 μg/plate for each tester strain in the presence and absence of S9 mix	The test material was non-toxic to TA100 and WP2uvrA, although small decreases in TA100 colony frequency were noted at the upper dose level. No significant increases in the frequency of revertant colonies were recorded for any of the	RAR Vol. 3 B.6.4.1/02 Key study

Method, guideline, deviations if any	Test substance	Relevant information about the study including rationale for dose selection (as applicable)	Observations	Reference
			bacterial strains and no test material precipitate was observed on the plates, with any dose of the test material, either with or without metabolic activation. Tribenuron-methyl technical was not mutagenic.	
<i>In vitro</i> mammalian chromosome aberration test OECD TG 473	Tribenuron- methyl technical Purity: 97.8%	0, 125, 250, 500, 750, 1000, 1250 and 1500 μg/ml for both the non- activated and S9 activated four hours exposure groups, with an additional lower dose level of 62.5 μg/ml for the S9 activated group	At the highest test concentration (1250 μ g/ml) evaluated microscopically for chromosome aberrations, mitotic inhibition was 46% relative to the solvent control. The percentage of cells with structural and numerical aberrations in the test article- treated groups were not significantly increased above that of the solvent control in neither the initial tests nor the independent repeat tests. Tribenuron-methyl was negative for structural and numerical chromosome aberrations in both non-activated and S9-activated test systems	RAR Vol. 3 B.6.4.1/03 Key study
<i>In vitro</i> mammalian cell gene mutation (CHO/HGPRT) test with an independent repeat assay	Tribenuron- methyl technical Purity: 97.8%	0, 250, 500, 1000, 1500 and 2700 μg/ml, in both S9 activated and non- activated system	Test article precipitate was observed at a dose level of 2700 μ g/mL in treatment medium at the end of treatment. Relative cloning efficiency at the highest dose tested was 140% and 99% in the first mutation assay and 106% and 99% in the independent repeat assay in non-activated and S9-activated systems, respectively. None of the treated cultures exhibited mutant frequencies of greater than 40 mutants per 106 clonable cells. Tribenuron-methyl did not cause a positive response in the CHO/HGPRT mutation assay in S9-activated non-activated systems.	RAR Vol. 3 B.6.4.1/04 Key study
<i>In vitro</i> unscheduled DNA synthesis in primary rat hepatocytes OECD TG 482	Tribenuron- methyl technical	0, 0.1, 1, 10 and 100 μM diluted in dimethylsulfoxide (DMSO)	No cytotoxicity was observed at a medium concentration of 2500 μ M of tribenuron-methyl. No concentration of test compound showed average net nuclear grain count above five, which was the	RAR Vol. 3 B.6.4.1/05 Key study

Method, guideline, deviations if any	Test substance	Relevant information about the study including rationale for dose selection (as applicable)	Observations	Reference
	Purity: 96.8%		definition of a positive UDS inducer. No statistically significant increases of UDS or positive linear dose-responses were observed. Tribenuron-methyl was negative in the UDS assay.	

Table 34: Summary table of mutagenicity/genotoxicity tests in mammalian somatic or germ cells *in vivo*

Method, guideline, deviations if any	Test substance	Relevant information about the study (as applicable)	Observations	Reference
Chromosome aberration study in rat bone marrow cells The study generally follows the OECD TG 475 with some derivations <i>Deviations</i> <i>include</i> <i>sampling times</i> of 6, 24, and 48 hours after the treatment, differing from the guideline recommended post-treatment sampling times of 12–18, and 24 hours after the first sampling time; scoring 500, not 1000, cells per animal for determination of the mitotic index; and scoring 50, not 100, cells per	Tribenuron- methyl technical Purity: 96.8%	0, 50, 500 and 5000 mg/kg bw/day diluted in Mazola® corn oil Oral intubation	From 50 mg/kg bw per day: red-coloured discharge from the mouth From 500 mg/kg bw per day: wheezing, decreased weight gain and body weight loss. From 5000 mg/kg bw per day: lethargy, hunched back, sensitivity to touch. There were no significant differences in mitotic indices. Tribenuron-methyl did not induce chromosome aberrations in bone marrow cells of rats. Thus, tribenuron-methyl is considered non-clastogenic in this <i>in vivo</i> test.	RAR Vol. 3 B.6.4.2/01 Key study

Method, guideline, deviations if any	Test substance	Relevant information about the study (as applicable)	Observations	Reference
animal for evaluation of chromosomal aberrations.				
Mouse bone marrow micronucleus assay The study partly follows the OECD TG 475 <i>Deviations</i> <i>include</i> <i>conducting the</i> <i>test as a limit</i> <i>test at 5000</i> <i>mg/kg, not using</i> <i>three dose levels</i> <i>for the first</i> <i>sampling time,</i> <i>even though</i> <i>observable toxic</i> <i>effects and</i> <i>mortality</i> <i>occurred;</i> <i>including a 72-</i> <i>hour sampling</i> <i>time of the bone</i> <i>marrow which</i> <i>exceeds the</i> <i>guideline</i> <i>recommendation</i> <i>of not extending</i> <i>the sampling</i> <i>beyond 48 hours</i> <i>after treatment;</i> <i>and scoring</i> <i>1000, and not</i> <i>2000, PCEs per</i> <i>animal for the</i> <i>presence of</i> <i>micronuclei</i>	Tribenuron- methyl technical Purity: 96.8%	Mice (Crl:CD®- 1(ICR)BR) bone marrow cells Single dose of 5000 mg/kg bw per day, diluted in Mazola® corn oil, oral inturbation	Three animals were found dead 48 hours after the tribenuron- methyl treatment. Clinical signs: hyperactivity, diarrhoea, decreased activity, hyperactivity and hypersensitivity. There were no statistically significant differences in the percent of micronucleated polychromatic erythrocytes - methyl-treated groups and the concurrent negative controls. Significant depression of the PCE:NCE (normochromatic erythrocytes) ratio was detected among tribenuron-methyl treated animals at the 48-hour sampling time. This indicates that the dose tested was sufficient to cause target tissue cytotoxicity. Tribenuron-methyl did not induce micronuclei in bone marrow cells of mice.	RAR Vol. 3 B.6.4.2/02 Key study
From the open literature, Cytogenetic Effects of Technical and Formulated Tribenuron- methyl on Rat	Tribenuron- methyl, technical Purity: 95 % and Formulated product Granstar [®] 75 % DF (components	Male albino rats (strain not specified) Single oral dose at dose: 0, 5, 25, 50 or 100 mg/kg to 8 groups of 6 male and ten repeat doses: 0, 5, 25, 50 or 100	Technical and formulated tribenuron-methyl was not clastogenic/genotoxic following single administration up to the dose level of 100 mg/kg bw. However, clastogenic/genotoxic potential was observed following repeat dose administration at 100 mg/kg bw of technical material and at 50	RAR Vol. 3 B.6.4.2/03

Method, guideline, deviations if any	Test substance	Relevant information about the study (as applicable)	Observations	Reference
Bone-marrow Cells.	not specified)	mg/kg bw/day to 8 groups of 6 male	and 100 mg/kg bw of formulated product.	
Deficiencies including: absence of positive controls, repeat- dose exposures for 21 days, non-standard nomenclature for chromosome aberrations, blinding procedures not described, individual animal data not presented, historical control data not presented, dose levels not justified. <i>Only supportive</i> <i>data</i>				

Table 35: Summary table of human data relevant for germ cell mutagenicity

No data

10.8.1 Short summary and overall relevance of the provided information on germ cell mutagenicity

The genotoxic potential of tribenuron-methyl was investigated in four standard *in vitro* test systems (two Ames test, mammalian chromosome aberration test, and mammalian cell gene mutation test) reinforced with a chromosome aberration study in rat bone marrow cells and an *in vivo* mouse micronucleus test. The results from the guideline studies were consistently negative and based on these data, it was concluded that tribenuron-methyl does not possess any mutagenic or clastogenic properties. All these studies were conducted in accordance with the OECD Principles of Good Laboratory Practice (1981). However, in the non-guideline report (RAR Vol. 3, B.6.4.2/03) tribenuron-methyl was shown to cause chromosomal aberrations after repeated exposure of 100 mg/kg bw.

Testing using germ cells was not triggered as all in vitro and in vivo guideline studies were negative.

10.8.2 Comparison with the CLP criteria

The CLP Regulation allows classification of genotoxicity substances in two hazard categories, Category 1 and 2. Category 1 comprises two sub-categories, 1A and 1B. The criteria for the categories and sub-categorisation are given in table below:

Table 36: Criteria for	categories and	sub-categorisation	for genotoxicity

Sub-category	Assay
Category 1	Substances known to induce heritable mutations or to be regarded as if they induce heritable mutations in the germ cells of humans. Substances known to induce heritable mutations in the germ cells of humans.
Category 1A	The classification in Category 1A is based on positive evidence from human epidemiological studies. Substances to be regarded as if they induce heritable mutations in the germ cells of humans.
Category 1B	The classification in Category 1B is based on:
	-positive results(s) from in vivo heritable germ cell mutagenicity tests in mammals; or
	-positive result(s) from <i>in vivo</i> somatic cell mutagenicity tests in mammals, in combination with some evidence that the substance has potential to cause mutations to germ cells. It is possible to derive this supporting evidence from mutagenicity/genotoxicity tests in germ cells <i>in vivo</i> , or by demonstrating the ability of the substance or its metabolite(s) to interact with the genetic material of germ cells; or
	-positive results from tests showing mutagenic effects in the germ cells of humans, without demonstration of transmission to progeny; for example, an increase in the frequency of aneuploidy in sperm cells of exposed people.
Category 2	Substances which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans. The classification in Category 2 is based on:
	-positive evidence obtained from experiments in mammals and/or in some cases from <i>in vitro</i> experiments, obtained from:
	• Somatic cell mutagenicity tests <i>in vivo</i> , in mammals; or
	• Other <i>in vivo</i> somatic cell genotoxicity tests which are supported by positive results from <i>in vitro</i> mutagenicity assays.
	Note; Substances which are positive in <i>in vitro</i> mammalian mutagenicity assays, and which also show chemical structure activity relationship to known germ cell mutagens, shall be considered for classification as Category 2 mutagens.

The results from the guideline studies performed with tribenuron-methyl were consistently negative. Thus, tribenuron-methyl does not fulfil the classification criteria for germ cell mutagenicity.

10.8.3 Conclusion on classification and labelling for germ cell mutagenicity

No classification is proposed for tribenuron-methyl.

10.9 Carcinogenicity

Method, guideline, deviations if any, species, strain, sex, no/group	Test substance, dose levels duration of exposure	Results	Reference
Two year combined chronic toxicity/oncogenicity long- term feeding study in rats. Crl:CD/BR rats Oral via dietary admixture OECD TG 453	Tribenuron-methyl Purity: 96.8% 0, 25, 250 and 1250 ppm corresponding in male to: 0, 0.95, 10, 55 mg/kg bw/day and in female: 0, 1.2, 13, 76 mg/kg bw/day	No mortality but general toxicity without a specific target organ. Mean body weights were decreased by 43% and 29% for female and male rats, respectively, in 1250 ppm dose groups. Body weight gains were decreased in the highest dose by 36% and 53% in the males and females, respectively. Body weight gain was also significantly decreased in 250 ppm females by 27%. Significant increase in mammary gland adenocarcinomas was noted in females of the high-dose-group. There were also several systemic non- neoplastic effects in the male 250 and 1250 ppm dose groups and in the female 1250 ppm dose group when compared to controls (mineralisation of stomach and aorta, spleen lymphoid depletion, increased pancreas polyarteritis, reduced secretion from seminal vesicles, liver fatty change, bilateral dilatation in renal pelvis, uterus dilatation and renal degeneration). However, a specific target organ was not identified for non-neoplastic effects in male rats. The NOAEL of tribenuron-methyl in rat in long-term feeding was 25 ppm (corresponding to around 1 mg/kg bw per day) based on reduced bodyweight gain in females noted at ≥250 ppm and in males noted at 1250 ppm, reduced bodyweight noted in both sexes at 1250 ppm, organ weight changes, non- neoplastic histopathological findings in males at ≥250 ppm and in females at 1250 ppm, and an significant increased incidence of total mammary adenocarcinomas in female rats at the high-dose level (1250 ppm).	RAR Vol. 3 B.6.5.1/01 Key study
Oncogenicity study, eighteen-month feeding study in mice Crl:CD [®] -1(ICR)BR mice OECD TG 453 <i>No measurements of</i> <i>coagulation function was</i> <i>done</i>	Tribenuron-methyl Purity: 94.2% 0, 20, 200 and 1500 ppm; corresponding in male to: 0, 2.5, 25 and 197 mg/kg/day and in female: 0, 3.1, 31 and 247 mg/kg/day, respectively	None of the clinical signs that were observed were considered to be test substance-related. The incidence of mortality was similar among the treatment and control groups. Mean body weights, mean body weight gain and food consumption in the treated group were similar to controls except that statistically significant decreased (20%) bodyweight gain was noted in females of the highest dose group.	RAR Vol. 3 B.6.5.2 Key study

Table 37: Summary table of animal studies on carcinogenicity

Method, guideline, deviations if any, species, strain, sex, no/group	Test substance, dose levels duration of exposure	Results	Reference
		 The relative liver weight increased (19%) in males at the high dose group. Histopathology data revealed several minor modifications in the normal lesions of ageing within the male and female 1500 ppm dose groups when compared to their respective control groups. In addition, secondary changes observed in a few organs (testes, thyroid, and epididymis) were considered to be directly related to the amyloidosis observed and to the slightly catabolic condition seen in these groups. No compound-related increases in the incidence of tumours were observed in this study. The NOAEL was 20 ppm (2.5 mg/kg bw/day) based on the effects seen in males; amyloidosis and bilateral oligospermia in the 200 ppm (25 mg/kg bw) dose groups and reduced bodyweight gain noted in females at 1500 ppm. 	

Table 38: Summary table of human data on carcinogenicity

No data.

Table 39: Summary	table of other	studies relevant for	carcinogenicity

Method, guideline, deviations if any, species, strain, sex, no/group	Test substance, dose levels duration of exposure	Results	Reference
 90-day feeding study on oestrous cycle Guideline: not applicable Rat Crl:CD BR Female rats (20/group) No measurements of coagulation function was done. In the study the ability of tribenuron-methyl and its metabolites to compete in vitro for binding to the estrogen and progesterone receptors from uterine cytosol was also investigated. 	Tribenuron-methyl Purity: 94.8% 0, 5000 ppm corresponding to 390 mg/kg bw/day	No deaths or clinical observations. Body weights and body weight gains approximately 26% and 40% lower than control values. These changes were associated with reduced food consumption (27% of control) and food efficiency (18% of control). Increased mean liver weight, increased mean relative uterine weight (consistent with the increase in uterine proliferation), increased mean relative ovarian weight, prolonged estrous, and two- to three-fold decrease uterus and mammary oestrogen receptor affinity, and two-fold increase in progesterone receptor number. <u>In vitro study:</u>	RAR Vol. 3 B.6.8.2.1/01

Method, guideline, deviations if any, species, strain, sex, no/group	Test substance, dose levels duration of exposure	Results	Reference
		Seven tribenuron-methyl metabolites can bind to the estrogen receptor (Tribenuron- methyl acid, N-Demethyl triazine amine, α - hydroxi triazine amine, N-Demethyl-6- hydroxymethyl triazine amine, Metsulfuron methyl, Sulfonamide urea, Hydroxylated saccharin).	

10.9.1 Short summary and overall relevance of the provided information on carcinogenicity

The data available to assess this endpoint include two long-term studies (RAR Vol. 3, B.6.5). In addition a 90day feeding study is available investigating hormonal activity for tribenuron-methyl (RAR Vol. 3, B.6.8.2.1/01). These studies were assessed in the first DAR of 2004.

For the renewal of the active substance further investigations (QSAR evaluations of tribenuron-methyl and metabolites and *in vitro* studies conducted with tribenuron-methyl) were conducted to investigate the potential for tribenuron to bind or activate estrogen receptors (RAR Vol. 3, B.6.8.3).

The conclusions from the previous assessment remain.

Rat:

Two year toxicity study:

In the long-term toxicity study in the rat (a GLP study), tribenuron-methyl was associated with increased tumour incidence. The study follows the OECD TG 453 except that no measurements of coagulation function was done. However, reconduct is unlikely to yield a significantly different result because no evidence of a bleeding disorder was observed.

The incidence of total malignant tumours in female rats was significantly increased in the high-dose level after tribenuron methyl administration. This was a result of the significant increase in mammary gland adenocarcinomas in the high-dose level.

The incidence in cancer in males increased already in the low dose but there were no dose response and no significant increase in any specific cancer type. The incidence is 21, 40, 33, 36 % in control, 25, 250, and 1250 ppm, respectively. In the 1250 ppm group (55 mg/kg bw/day) the MTD was exceeded as the mean body weight compared to control decreased with 29 %. The incidence in cancer in males was considered to be a statistical aberration and have no biological importance. Additional historical control data for tumour incidences in the male rat were submitted by the applicant during the peer-review of the active substance (see Appendix to RAR Vol. 3, Annex B.6).

The incidence in total adenocarcinoma in females increased in the middle and high dose (15, 15, 22 and 43% for control, 25, 250 and 1250 ppm respectively) but was only significant at the highest dose (the historical control incidence is 20 % with a range from 8 to 23). Additional historical control data were submitted by the applicant during the peer-review of the active substance (see table below). No increased incidence of non-neoplastic changes in the mammary gland was noted (see table below). At the two highest doses the maximum tolerated dose (MTD) seems to be reached as the body weight decreased, compared to control, with 21 and 43 % respectively for 250, 1250 ppm (see figure below). Adenocarcinoma were produced only at doses which exceeded the MTD. The dose-response for adenocarcinoma-induction, along with the demonstrated absence of genotoxicity, suggest that a non-genotoxic, threshold mechanism is responsible for the adenocarcinoma observed following exposure to a high dietary concentration of tribenuron-methyl. The specific mechanism(s) involved are not known but it seems like the cancer is secondary to general toxicity.

Irrespective of the mechanism, the relevance to humans of adenocarcinoma-induction in rat only at dose that greatly exceeded an MTD, and in a strain with high spontaneous mammary tumor rate, is questionable.

Table 40: Historical control data for female Sprague-Dawley Rat mammary adenocarcinoma incidence

Report#	#/group	#examined histo.	#with lesions	% incidence	strain	dates (in life)
HLR 61-87 (TBN study)	60 (0 ppm)	60	9 (8s/1m)	15	Crl:CD BR/KNY	8/84-8/86
HLR 61-87 (TBN study)	58 (250 ppm)	57	13 (11s/2m)	22.3	Crl:CD BR/KNY	8/84-8/86
HLR 61-87 (TBN study)	61 (1250 ppm)	61	26 (15s/11m)	42.6 ^a	Crl:CD BR/KNY	8/84-8/86
1984a	69	67	7	10.4	Crl:CD BR/WMA	1/81-2/83
1985a	66	64	15	23	Crl:CD BR/KNY	3/83-3/85
1985b	33	33	2	6	Crl:CD BR/KNY	2/83-2/85
1986a	66	66	10	15	Crl:CD BR/KNY	4/83-4/85
1986b	59	58	12 (4m/8s)	20.7	Crl:CD BR/KNY	11/83- 11/85
1988a	60	60	13	21.7	Crl:CD BR/KNY	9/85-10/87
1989a	62	62	14 (9s/5m)	22.6	Crl:CD BR/KNY	9/86-9/88
1989b	62	62	14 (13s/1m)	22.6	Crl:CD BR/KNY	8/86-8/88
1989c	47	47	8(4s/3m/1cs)	17	Crl:CD BR/KNY	8/87-8/89
1990a	49	49	4 (2s/2m)	8.2	Crl:CD BR/KNY	7/87-7/89
1990b	50	50	13 (9s/3m/1cs)	26	Crl:CD BR/RNC	10/88- 10/90
1991	49	49	10 (10s)	20	Crl:CD BR/KNY	7/88-8/90
1992	56	56	17	30.4	Crl:CD BR/RNC	7/89-7/91
HCD Range				1.5-30.4%		

^a outside HCD

S=single occurrence per animal

M=multiple occurrences per animal

cs=carcinosarcoma

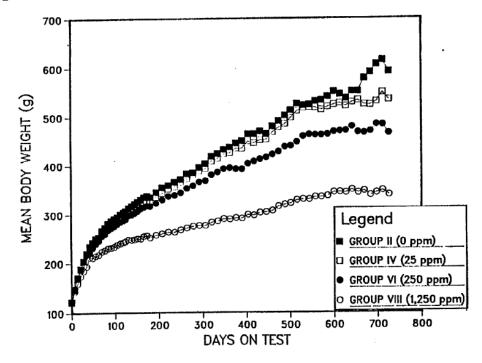
Table 41: Incidences of neoplastic microscopic observations after two-year feeding with tribenuronmethyl in rats – number of animals affected

Dose	Control	25 ppm	250 ppm	1250 ppm
Incidence of microscopic observations		- FF		
Females				
Number of animals in group	60	60	58	61
Mammary gland:	<u> </u>		<u> </u>	
Adenocarcinoma	8	8	11	15
Adenocarcinoma multiple	1	1	2	11*
Total adenocarcinoma	9/60 ^a	9/60	13/58	26/61*
Brain: Astrocytoma	1	0	0	0
Spinal cord: Astrocytoma	0	0	1	0
Heart: Endocardial sarcoma	0	1	0	0
Liver: Hepatocellular carcinoma	0	1	0	0
<u>Jejunum:</u> Neurofibrosarcoma	1	0	0	0
<u>Kidney:</u> Lyposarcoma	0	1	0	0
Vagina: Squamous cell carcinoma	0	0	0	1
<u>Pituitary:</u> Carcinoma	2	4	0	4
Thyroid: Follicular adenocarcinoma and cell carcinoma	2	1	2	1
<u>Adrenal cortex: Carcinoma</u>	1	0	0	1
Adrenal medulla: Pheochromocytoma	1	0	0	0
<u>Thymus:</u> Chemodectoma	0	0	0	1
Skin: Carcinoma and fibrosarcoma	0	2	0	0
Miscellaneous:				
head:squamous carcinoma and rhabdomysarcoma	2	0	1	1
limb: histocytic sarcoma	0	0	1	0
multiple organs: lymphoma, lymphoblastic and histocytic	0	2	4	1
sarcoma	7	0	0	0
Peritoneal cavity: Mesothelioma	1	0	0	0
Tail:fibrosarcoma and neurofibrosarcoma	0	0	1 7	1
Total Miscellaneous tumours	3	2	/	3
Total malignant tumours	20/60	21/60	23/58	37/61*
Males	62	<i>c</i> 0	60	<i>c</i> 1
Number of animals in group	$\frac{62}{0}$	$\frac{60}{0}$	$\frac{60}{2}$	$\frac{61}{l}$
<u>Brain</u> : Astrocytoma and mixed cell glioma				1
Spinal cord: Astrocytoma			2	
	0	0	1	0
Nasal cavity/tubinates: Oesteosarcoma and squamous				
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma	0 0	0 2	1 0	0 0
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma	0 0 1	0 2 0	1 0 0	0 0 0
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma <u>Heart:</u> Chemodectoma	0 0 1 0	0 2 0 0	1 0 0 1	0 0 0 0
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma <u>Heart:</u> Chemodectoma <u>Liver:</u> Hepatocellular carcinoma	0 0 1 0 2	0 2 0 0 4	1 0 1 0	0 0 0 3
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma <u>Heart:</u> Chemodectoma <u>Liver:</u> Hepatocellular carcinoma <u>Pancreas:</u> Islet cell carcinoma	0 0 1 0 2 0	0 2 0 0 4 2	1 0 1 0 0	0 0 0 3 0
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma <u>Heart:</u> Chemodectoma <u>Liver:</u> Hepatocellular carcinoma <u>Pancreas:</u> Islet cell carcinoma <u>Salivary:</u> Sarcoma	0 0 1 0 2 0 0	0 2 0 0 4 2 1	1 0 1 0 0 0 0	0 0 0 3 0 0
<u>Nasal cavity/tubinates:</u> Oesteosarcoma and squamous cell carcinoma <u>Lung:</u> Epidermoid carcinoma <u>Heart:</u> Chemodectoma <u>Liver:</u> Hepatocellular carcinoma <u>Pancreas:</u> Islet cell carcinoma <u>Salivary:</u> Sarcoma <u>Kidney:</u> Lyposarcoma and mixed tumour	0 0 1 0 2 0 0 1	0 2 0 0 4 2 1 0	1 0 1 0 0 0 0 1	0 0 0 3 0 0 1
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinarybladder:Transitional cell carcinoma	0 0 1 0 2 0 0 0 1 0	0 2 0 0 4 2 1 0 0	1 0 1 0 0 0 0 1 1 1	0 0 0 3 0 0 1 0
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinarybladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasma	0 0 1 0 2 0 0 0 1 0 0	0 2 0 0 4 2 1 0 0 2	1 0 1 0 0 0 0 1 1 1 0	0 0 0 3 0 0 1 0 0
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesothelioma	0 0 1 0 2 0 0 0 0 1 0 0 0 0	0 2 0 0 4 2 1 0 0 2 0	1 0 1 0 0 0 0 1 1 1 0 0 0	0 0 0 3 0 0 1 0 0 2
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma	0 0 1 0 2 0 0 0 1 0 0 0 1	0 2 0 0 4 2 1 0 0 2 0 1	1 0 1 0 0 0 0 1 1 1 0 0 0 0	0 0 0 3 0 0 1 0 0 2 0
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinoma	0 0 1 0 2 0 0 0 0 1 0 0 0 0	0 2 0 0 4 2 1 0 0 2 0	1 0 1 0 0 0 0 1 1 1 0 0 0	0 0 0 0 3 0 0 1 0 0 2 0 5
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinoma	0 0 1 0 2 0 0 0 1 0 0 0 1 1 1	0 2 0 0 4 2 1 0 0 2 0 1 0 1	1 0 1 0 0 0 0 1 1 1 0 0 0 2	0 0 0 3 0 0 1 0 0 2 0
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinarybladder:Transitional cell carcinomaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinomaAdrenal medulla:Pheochromocytoma	0 0 1 0 2 0 0 0 1 1 0 0 0 1 1 1 1 1	0 2 0 0 4 2 1 0 0 2 0 1 0	1 0 1 0 0 0 0 1 1 1 0 0 0 2 0	0 0 0 0 3 0 0 1 0 0 2 0 5 0 4
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinoma	0 0 1 0 2 0 0 0 1 1 0 0 0 1 1 1 1 4	0 2 0 0 4 2 1 0 0 2 0 1 0 1 3	$ \begin{array}{c} 1 \\ 0 \\ 1 \\ 0 \\ 0 \\ 0 \\ 1 \\ 1 \\ 0 \\ 0 \\ 2 \\ 0 \\ 3 \\ \end{array} $	0 0 0 0 3 0 0 1 0 0 2 0 5 0
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinomaAdrenal medulla:PheochromocytomaSpleen:HemangiosarcomaMiscellaneous:Miscellaneous:	0 0 1 0 2 0 0 0 1 1 0 0 0 1 1 1 1 4 0	0 2 0 0 4 2 1 0 0 2 0 1 0 1 3 1	$ \begin{array}{c} 1 \\ 0 \\ 1 \\ 0 \\ 0 \\ 0 \\ 1 \\ 1 \\ 0 \\ 0 \\ 2 \\ 0 \\ 3 \\ 0 \end{array} $	0 0 0 0 3 0 0 1 0 0 2 0 5 0 4 0 1
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinomaAdrenal medulla:PheochromocytomaSpleen:HemangiosarcomaMiscellaneous:head:squamous carcinoma	0 0 1 0 2 0 0 0 1 1 0 0 0 1 1 1 1 4 0	0 2 0 0 4 2 1 0 0 2 0 1 0 1 3 1	1 0 1 0 0 0 0 1 1 1 0 0 0 0 2 0 3 0 3 2 2	0 0 0 0 3 0 0 1 0 0 2 0 5 0 4 0 1 3 3
Nasal cavity/tubinates:Oesteosarcoma and squamouscell carcinomaLung:Epidermoid carcinomaHeart:ChemodectomaLiver:Hepatocellular carcinomaPancreas:Islet cell carcinomaSalivary:SarcomaKidney:Lyposarcoma and mixed tumourUrinary bladder:Transitional cell carcinomaTestes:Interstitial cell tumour and neoplasmaEpididymides:Adenocarcinoma and mesotheliomaSeminal vesicle:Adenocarcinoma and cell carcinomaThyroid:Follicular adenocarcinoma and cell carcinomaAdrenal cortex:Cortical carcinomaAdrenal medulla:PheochromocytomaSpleen:HemangiosarcomaMiscellaneous:Miscellaneous:	0 0 1 0 2 0 0 0 1 0 0 0 0 1 1 1 4 0 1 1 1 4 0 1	0 2 0 0 4 2 1 0 0 2 0 1 0 0 2 0 1 1 3 1 2	$ \begin{array}{c} 1 \\ 0 \\ 1 \\ 0 \\ 0 \\ 0 \\ 1 \\ 1 \\ 0 \\ 0 \\ 2 \\ 0 \\ 3 \\ 0 \\ 3 \end{array} $	0 0 0 0 3 0 0 1 0 0 2 0 5 0 4 0 1

Dose	Control	25 ppm	250 ppm	1250 ppm		
multiple organs: granulocytic leukemia and histocytic	0	3	2	1		
sarcoma						
pinna: neurofibrosarcoma	0	1	0	1		
Total Miscellaneous tumours	1	5	6	5		
Total malignant tumours	13/62	24/60*	20/60*	22/61*		
* Statistically significant: Fisher's Exact Test, p<0.05						
^a 15% compared to 12% which is the laboratory average i	in the histori	cal data				

For incidences of non-neoplastic microscopic observations after two-year feeding with tribenuronmethyl in rats see section 10.12.1.1.

Figure: Growth curves of female rats



90-day toxicity study on estrogenous effect (supplementary study):

In a supplementary study om carcinogenicity (RAR Vol. 3, B.6.8.2.1/01), tribenuron-methyl effects on the endocrine system (increased mean relative uterine weight, increased qualitative uterine cell proliferation, increased mean relative ovarian weight, increased incidence of prolonged estrous, two- to three-fold decrease uterus (from rats sacrificed in estrous) and mammary oestrogen receptor affinity, and two-fold increase in progesterone receptor number) were observed following administration of tribenuron-methyl. However, the marked decrements in body weight parameters at 5000 ppm makes the evaluation of the study complicated. It is known that many hormonal and reproductive endpoints are altered by caloric restriction. Therefore, the effects detected in this study, as variations of the estrous cycle length, organs weights and hormone levels cannot be taken into consideration regarding a potential oestrogenic mechanism. The ability of tribenuron-methyl and its metabolites to compete *in vitro* for binding to the estrogen and progesterone receptors from uterine cytoxol was also investigated in the study. As a result, seven tribenuron-methyl metabolites can bind to the estrogen receptor (Tribenuron-methyl acid, N-Demethyl triazine amine, α -hydroxi triazine amine, N-Demethyl-6-hydroxymethyl triazine amine, Metsulfuron methyl, Sulfonamide urea, Hydroxylated saccharin). When these binding data are considered along with the increase in progesterone receptor number observed in the *in vivo* study, a hormonally mediated mechanism of mammary tumour induction cannot be ruled out.

In vitro studies conducted with tribenuron-methyl and its metabolite IN-A4089 (Vol. 3, B.6.8.3) and QSAR analyses conducted with tribenuron-methyl and ten metabolites (Vol. 3, B.6.8.3/07)

As a follow-up, an evaluation of the potential for tribenuron-methyl or its metabolite (IN-A4089) to bind or activate estrogen receptors was conducted via *in vitro* assays. Results:

Tribenuron-methyl and IN-A4089 were negative when induction or inhibition of 17β -estradiol was tested (Vol. 3, B.6.8.3/01 and 02).

Tribenuron-methyl and IN-A4089 were shown to not interact with estrogen receptor (Vol. 3, B.6.8.3/03 and 05).

Tribenuron-methyl and IN-A4089 were shown not to be agonists of human estrogen α in HeLa-9903 cell model system (Vol. 3, B.6.8.3/04 and 06).

As another follow-up, tribenuron-methyl and its metabolites were evaluated via QSAR (Toolbox v3.3.5, OASIS TIMES v2.27.16, DEREK v4.1, MedChem Studio v4.0, and ADMET Predictor v7.2 software) for structural alerts for estrogen receptor binding. The tested metabolites were: IN-D5119, IN-R9803, IN-G7462, IN-D5803, IN-R9805, IN-00581, IN-B5685, IN-T6376, IN-L5296 and IN-A4098. Tribenuron-methyl and all metabolites was all "non-binder" except IN-G7462 which seems to be false.

These data indicate that neither tribenuron-methyl nor its metabolites demonstrated potential to be endocrine active.

As a conclusion: Mammary tumors were produced only at doses which exceeded the MTD. The dose-response for mammary tumor induction, along with the demonstrated absence of genotoxicity, suggest that a non-genotoxic, threshold mechanism is responsible for mammary tumors observed following exposure to a high dietary concentration of tribenuron-methyl. Irrespective of the mechanism, the relevance to humans of mammary tumor-induction in rat only at dose that greatly exceeded an MTD, and in a strain with high spontaneous mammary tumor rate, is questionable.

A mechanistic study was completed which was inconclusive regarding the potential for an estrogenic mechanism. As a follow-up, an evaluation of the potential for tribenuron or ten metabolites to bind or activate estrogen receptors was conducted via QSAR evaluation and *in vitro* assays were completed as well. No structural alerts for estrogen receptor binding were found for the target molecules in the QSAR analyses. Furthermore, no estrogenic antagonistic activities were found in the *in vitro* studies conducted with tribenuron-methyl and one of its metabolites.

Mouse:

In the long-term toxicity study in the mouse (a GLP study) performed with tribenuron-methyl, no compoundrelated increases in the incidence of tumours were observed. The study follows the OECD TG 453 with exception that no measurements of coagulation function was done. However, reconduct is unlikely to yield a significantly different result because no evidence of a bleeding disorder was observed.

Histopathology data revealed several minor modifications in the normal lesions of ageing within the male and female 1500 ppm groups (197 mg/kg bw/day) when compared to controls. These effects were not considered to be of adverse character and included a slight increase in severity of amyloidosis and marginal changes in some background inflammatory lesions, an increased incidence in thyroid inflammation in the 1500 ppm dose of both sexes, a higher incidence of bilateral testicular atrophy at the highest dose. A specific target organ was not identified.

10.9.2 Comparison with the CLP criteria

According to Regulation 1272/2008 (CLP) substances are classified for carcinogenicity in Category 1 (known or presumed human carcinogens) on the basis of epidemiological and/or animal data. Category 1 is subcategorised into 1A if the substance is "known to have carcinogenic potential for humans, classification is largely based on human evidence" and 1B if "presumed to have carcinogenic potential for humans classification is largely based on animal evidence."

As there is no human data available for tribenuron-methyl that may be relevant for carcinogenicity, criteria for category 1A are not fulfilled.

For classification in category 1B evidence may be derived from "[...]animal experiments for which there is sufficient (1) evidence to demonstrate animal carcinogenicity (presumed human carcinogen) [...] In addition on a case–by-case basis, scientific judgement may warrant a decision of presumed human carcinogenicity derived from studies showing limited evidence of carcinogenicity in humans together with limited evidence of carcinogenicity in experimental animals."

<u>Sufficient evidence</u> from animal studies is explained as "a causal relationship has been established between the agent and an increased incidence of malignant neoplasms or of an appropriate combination of benign and malignant neoplasms in (a) two or more species of animals or (b) two or more independent studies in one species carried out at different times or in different laboratories or under different protocols. [...]"

Tribenuron-methyl does not fulfil this criteria (mammary gland adenocarcinomas were only found in one species in one study).

The placing of substance in Category 2 (suspected human carcinogens) "is done on the basis of evidence obtained from human and/or animal studies, but which is not sufficiently convincing to place the substance in Category 1A or 1B, based on strength of evidence together with additional considerations (see section 3.6.2.2). Such evidence may be derived either from limited (2) evidence of carcinogenicity in human studies or from limited evidence of carcinogenicity in animal studies."

<u>Limited evidence from animal studies</u> is explained as "data suggest a carcinogenic effect but are limited for making a definitive evaluation because, e.g. (a) the evidence of carcinogenicity is restricted to a single experiment; (b) there are unresolved questions regarding the adequacy of the design, conduct or interpretation of the studies; (c) the agent increases the incidence only of benign neoplasms or lesions of uncertain neoplastic potential; or (d) the evidence of carcinogenicity is restricted to studies that demonstrate only promoting activity in a narrow range of tissues organs"

An increased incidence of mammary gland adenocarcinomas was noted in female rats. However, the relevance to humans of mammary tumor-induction in rat only at dose that greatly exceeded an MTD, and in a strain with high spontaneous mammary tumor rate, is questionable. The specific mechanism(s) involved are not known but it seems like the cancer is secondary to general toxicity.

10.9.3 Conclusion on classification and labelling for carcinogenicity

The relevance to humans of mammary tumor-induction in rat only at dose that greatly exceeded an MTD, and in a strain with high spontaneous mammary tumor rate, is questionable. The specific mechanism(s) involved are not known but it seems like the cancer is secondary to general toxicity. Therefore data is neither considered as sufficient evidence for category 1B nor as limited evidence for category 2. Consequently, no classification for carcinogenicity is proposed for tribenuron-methyl.

10.10 Reproductive toxicity

10.10.1.1 Adverse effects on sexual function and fertility

Table 42: Summary table of animal studies on adverse effects on sexual function and fertility

Test substance Test type Route of exposure Method Guideline Tribenuron- methyl	Species Strain Sex No./group Vehicle Rat Crl:CD [®] (SD)BR	Doses Exposure Period 0, 25, 250, 1000 ppm This corresponds to 70-day mean	Results 25 ppm: No effects	Reference RAR Vol. 3
Purity: 94.2% Two- generation reproduction toxicity study Oral (dietary) U.S. EPA 83-4 (1982)	M, F 23/sex/dose	daily intakes of 0, 1.9, 19, and 75 mg/kg bw/day and 0, 2.15, 21.3 and 88 mg/kg bw/day for male and females animals, respectively. The mean daily intakes during gestation were: 0, 2, 20 and 85, and 0, 2, 20 and 78 mg/kg bw/day for the first and second F0 animals, respectively, and 0, 1.8, 18 and 76, and 0, 2, 20 and 79 mg/kg bw/day for the first and second generation F1 animals. Throughout this study, rats were fed diets that contained the test substance. After 70 days on test, the F0 generation was bred to produce the F1A and F1B litters. At weaning, randomly selected F1A rats were fed diets containing the test substance for 80 days and then mated to produce F2A and F2B litters. 3 weeks prior to mating and during the mating period. In males treatment was continued throughout the mating period and until killing shortly thereafter. In females treatment was continued throughout pregnancy and lactation period.	250 ppm: Parental: ↓ bw (F1A females: 4-11%) ↓ bw gain (F0 males: Day 0- 70: 7%; F1A females: premating day 0-77: 13%) ↓ FC (F1A females) Offsprings: ↓ bw (F1B pups: 8%; F2B pups 9%) -organ weight changes in F2B weanlings (↑ rel testes, ↓ abs spleen (M, F), ↓ rel spleen (both sexes, s.s. in F only), ↓ abs liver (both sexes, s.s. in M only), ↑ rel lung (both sexes, s.s. in M only), and ↓ abs thymus (F, n.s.), ↓ abs heart (F, n.s.)) 1000 ppm: Parental: ↓ bw (F0 males: 16%; F1A males: 16%; F0 females: 16% (premating), 11% (1st and 2nd gestations), 6% (1st	B.6.6.1/01 Key study

				L1
			lactation), 12% (2nd lactation); F1A: 13-22%)	
			↓ bw gain (F0 males (Day 0- 70: 19%, Day 70-168: 24%); F0 females: 29% (premating); F1A females: 25% (premating Day 0-77)	
			\downarrow FC (F0 and F1 males and females)	
			-organ weight changes (↑ rel testes (F0 and F1A))	
			Offsprings:	
			-clinical signs (sparse fur, F2-generation)	
			↓bw (F1A pups: 9%; F1B pups: 16%; F2A pups: 10%; F2B pups: 12%)	
			-organ weight changes in F2B weanlings (\downarrow abs spleen (M, F), \downarrow rel spleen (both sexes, s.s. in F only), \downarrow abs liver (both sexes, s.s. in M only), \uparrow rel lung (both sexes, s.s. in M only), and \downarrow abs thymus (F, n.s.), \downarrow abs heart (F, n.s.), \downarrow abs kidney (F))	
			NOAEL: Parental and offspring: 25 ppm (approximately 2 mg/kg bw/day)	
			NOAEL: Reproductive: ≥1000 ppm (approximately 75 and 88 mg/kg bw/day in males and females, respectively)	
Tribenuron-	Rat	0, 100, 1750, 5000 ppm	<u>100 ppm:</u>	RAR Vol.
methyl	Crl:CD [®] (SD)BR	(correspond to 0, 7, 118, and 335	No effects	3
One- generation	M, F	mg/kg bw/day in males; 0, 8, 135, and 386 mg/kg bw/day in	<u>1750 ppm:</u>	B.6.6.1/02
reproduction	16/sex/dose	females)	Dams:	
toxicity study			↓ bw (15%)	Key study
Oral (dietary)		90 day prior to mating and	Offsprings:	
No Guideline		throughout the study	↓ bw (Day 21: 19%)	
Thoma and			<u>5000 ppm:</u>	
There are limitations			Dams:	
with regard to number of			↓ bw (23%)	
animals used			Offsprings:	
in the study and pathology				

(testes and epididymides were not weighed. No histopathology was performed).	<pre>↓ pup viability (Day 0-4: 19% per litter, Day 1-4: 14% per litter) ↓ bw (Day 21: 36%)</pre>	
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M: males F: females s.s.: statistically significant n.s.: not statistically significant

Table 43: Summary table of human data on adverse effects on sexual function and fertility

No data.

Table 44: Summary table of other studies relevant for toxicity on sexual function and fertility No data.

10.10.1.2 Short summary and overall relevance of the provided information on adverse effects on sexual function and fertility

A two-generation toxicity study (GLP) is available in the rat. Furthermore, a one-generation study (B.6.6.1/01) is available in the rat, but this non-GLP study is limited and considered as supplementary data only. The studies are thoroughly presented in Vol. 3 to RAR.

In the two-generation toxicity study (RAR Vol. 3, B.6.6.1/01), there was no adverse effects on reproduction, fertility, mating behavior or malformations in the offspring. Parental toxicity, indicated by decreased bodyweight growth and food consumption was noted from 250 ppm (approximately 20 mg/kg bw/day). At 1000 ppm, organ weight changes (increased relative testes) were noted in addition. Offspring toxicity was seen as expressed by clinical signs (sparse fur) noted in F2 generation at 1000 ppm, and decreased body weight growth noted from 250 ppm, and organ weight changes in F2B weanlings from 250 ppm. Organs that showed statistically significant weight changes were: testes, spleen, liver, kidneys (females only) and lungs. Other organs that showed weight changes were thymus (females) and heart (females) but these changes were not statistically significant.

In the one-generation toxicity study (RAR Vol. 3, B.6.6.1/02), treatment was associated with reduced pup weight noted at 1750 ppm (19%) and 5000 ppm (36%), and reduced pup viability noted at 5000 ppm. These effects on offspring weights and viability were noted at doses that also caused reduced bodyweight in dams (1750 ppm: 15%; 5000 ppm: 23%). Reproductive performance was not affected.

10.10.2 Comparison with the CLP criteria

According to CLP Guidance Annex 1: 3.7.2.4.3, "Classification is not necessarily the outcome in the case...when there is only a small reduction in foetal/pup weight..."

Two-generation reproduction toxicity study in the rat:

Administration of tribenuron-methyl at dietary concentrations of up to 1000 ppm (75 and 88 mg/kg bw/day in males and females, respectively) did not have any effect on mating performance or fertility. Parental toxicity, indicated by decreased bodyweight growth and food consumption was noted from 250 ppm (approximately 20 mg/kg bw/day). At 1000 ppm, organ weight changes (increased relative testes) were noted in addition. Offspring toxicity was seen as expressed by clinical signs (sparse fur) noted at 1000 ppm, and decreased body weight growth noted from 250 ppm, and organ weight changes (F2B weanlings) from 250 ppm. The observed effects were not considered of concern for a classification.

One-generation reproduction toxicity study in the rat:

Administration of tribenuron-methyl at dietary concentrations of up to 5000 ppm (335 and 386 mg/kg bw/day in males and females, respectively) did not have any effect on mating performance or fertility. Reduced bodyweight in pups were noted at maternal toxicity doses (reduced bodyweight gain). Reduced pup viability was noted at the high dose level of 5000 ppm. Because of the magnitude of effect on body weight gain in dams (23%) this effect could be secondary to maternal toxicity. The observed effects was not considered of concern for a classification.

10.10.3 Adverse effects on development

Table 45: Summary table of animal studies on adverse effects on development

Test substance	Species	Doses	Results	Reference
Test type	Strain	Exposure		
Route of	Sex	Period		
exposure	No./group			
Method	Vehicle			
Guideline				
Tribenuron- methyl	Rat	0, 20, 125, 500 mg/kg	Maternal effects:	RAR Vol. 3
Purity: 94.2%	CrI:COBS CD®(SD)BR bw/day	20 mg/kg bw/day:	B.6.6.2.1/01	
Developmental	25 dams/dose	Gestation	No effects	
toxicity study	0.5% hydroxypropyl methyl cellulose	days 6-15		Key study
Oral (gavage)	(Methocel [®])		<u>125 mg/kg bw/day</u> :	
U.S. EPA 83-3			↓ bw (5-7%)	
(1982)			↓ bw gain (13%) (adjusted bw gain): 31%)	
			↓ FC (4%)	
			-organ weight changes (↑ rel liver, 7%)	
			<u>500 mg/kg bw/day:</u>	
			- clinical signs (salivation)	
			↓ bw (18%)	
			↓ bw gain (53%) (adjusted bw gain): 98%)	
			↓FC (16%)	
			-organ weight changes (↑ rel liver, 17% ↓ average uterine weight, 19%)	
			-stomach ulceration (one animal)	
			Developmental effects: 20 mg/kg bw/day:	

			No officiate	
			No effects	
			<u>125 mg/kg bw/day:</u>	
			↓ bw (7%)	
			↑ skeletal alterations (incomplete ossification and unossified sites, bifid thoracic vertebral centra)	
			<u>500 mg/kg bw/day:</u>	
			↓ bw (26%)	
			↑ resorptions (mean no. resorptions: 1.5 compared to 1.0 in control group (n.s.); mean percentage of resorptions or dead conceptuses/litter: 13.9 compared to 5.7 in control group (n.s.))	
			↑ fetal deaths (no. dead fetuses: 15 compared to 0 in control group)	
			↑ skeletal alterations (incomplete ossification and unossified sites, bifid thoracic vertebral centra, enlarged fontanelle (one animal (n.s.))	
			↑ oedema (n.s.)	
			NOAEL maternal toxicity: 20 mg/kg bw/day NOAEL developmental toxicity: 20 mg/kg bw/day	
Tribenuron-	Rabbit	0, 5, 20, 80	Maternal effects:	RAR Vol. 3
methyl	Hra:(NZW)SPF	mg/kg bw/day	<u>5 mg/kg bw/day:</u>	B.6.6.2.2/01
Purity: 94.2%	22/dose group	bw/day	No effects	
Developmental	0.5% aqueous methyl	Gestation days 7-19		Key study
toxicity study	cellulose	uujs (1)	20 mg/kg bw/day:	Rey study
Oral (gavage)			- mortality (one dam)	
U.S. EPA 83-3 (1982)			- mortanty (one dam)	
			<u>80 mg/kg bw/day:</u>	
			-mortality (two dams)	
			-clinical signs (abortions, 6 animals compared to one control animal)	
			-bw loss (-325 g)	
			↓FC (48%)	

Developmental effects:
5 and 20 mg/kg bw/day:
No effects
80 mg/kg bw/day:
↓ bw gain (10%, biologically significant)
\downarrow live fetuses, total (5.8 compared to 8.1 in control group)
\downarrow nidations (6.5 compared to 8.9 in control group)
↑ malformations (mean % affected/litter: 13.4% compared to
0% in control group)
NOAEL maternal toxicity:
20 mg/kg bw/day
NOAEL developmental toxicity:
20 mg/kg bw/day

n.s.: not statistically significant

Developmental toxicity study in the rat (RAR, Vol. 3, B.6.6.2/01):

Maternal toxicity:

The maternal toxicity consisted of reduced body weight growth noted at 125 mg/kg bw/day (reduced bw: 5-7%, reduced bw gain 13%) and 500 mg/kg bw/day (reduced bw: 18%, reduced bw gain 53%), and increased relative liver weights noted at 125 mg/kg bw/day (7%) and 500 mg/kg bw/day (17%). Stomach ulceration was also noted in one animal of the high dose group (500 mg/kg bw/day).

Effects noted in pups:

Following effects were noted in the embryo/foetus:

- increased resorptions at 500 mg/kg bw/day (highest dose level).
- increased foetal deaths at 500 mg/kg bw/day (highest dose level)
- reduced body weights at 125 mg/kg bw/day (7%) and 500 mg/kg bw/day (26%)
- increased incidence of incomplete ossification and unissified sites, bifid thoracic vertebral centra at \geq 125 mg/kg bw/day
- enlarged fontanelle (one animal) at 500 mg/kg bw/day (highest dose level)
- oedema at 500 mg/kg bw/day (highest dose level)

Discussion:

- Fifteen of 16 fetuses in one 500 mg/kg bw/day litter were dead *in utero*, resulting in an increase in the average percentage of resorptions or dead conceptuses per litter. A slight increase in the average number of resorptions also occurred for the 500 mg/kg bw/day litters. Neither increase was significant compared to controls and this effect on embryo/fetal viability was not sufficiently severe to adversely affect the average number of live

fetuses per litter. No dam resorbed all conceptuses, and with the exception of the previously cited dead fetuses, all fetuses were alive at day 20 delivery.

- Increased fetal deaths were noted at the highest dose level in the presence of maternal toxicity. Because of the magnitude of effect on body weight gain this effect could be secondary to maternal toxicity.

- Reduced fetal weights were noted at maternally toxicity doses. The effect could be secondary to maternal toxicity.

- Retarded ossifications were noted in the fetuses at maternally toxicity doses, and were not considered to be a major manifestation of developmental toxicity

- Enlarged fontanelle was noted in a single (high dose) animal only, and in the presence of maternal toxicity. The effect was not statistically significant

- Oedema was noted at the high dose level only (in three pups of the same litter), and in the presence of maternal toxicity. The effect was not statistically significant

<u>As a conclusion</u>, the effects noted in the rat developmental toxicity study were not sufficient to trigger a proposal for classification for this hazard category.

Developmental toxicity study in the rabbit (RAR, Vol. 3, B.6.6.2/02):

Maternal toxicity:

The maternal toxicity consisted of mortalities (two females), clinical signs (abortions) and body weight loss (-325 g) noted in dams at 80 mg/kg bw/day. According to study author marked maternal toxicity occurred in the high dose group (80 mg/kg bw/day). Effects included an average maternal food consumption that was 48% lower than control over the gestation day 7-19 dosing period. After the initiation of dosing at this high dose, food consumption progressively decrased from approximately 22 to 66% lower than the control values. This reduced food consumption corresponded to a mean body weight loss of 325 g (compared to a body weight gain of 114 in controls) over the gestation day 7-19 dosing period.

Two pilot teratogenicity studies were conducted to determine the maximum tolerated dose of the test substance by gavage in the rabbit. Based on data obtained from a pilot teratogenicity study, 6 females per group were given 0, 250, 500 or 750 mg/kg body weight in the first rabbit pilot study. These dose levels were found to be extremely toxic to the female rabbit and all females in the 500 and 750 mg/kg dose groups died. The dose level for the 250 mg/kg group was reduced to 125 mg/kg after 5 doses in an effort to determine the maximum tolerated dose. Although all six females in the low dose goup survived until scheduled sacrifice, no litters were produced. In the second rabbit pilot study, 7 females per group received the test substance at dose levels of 150 or 75 mg/kg body weight. The 150 mg/kg dose group demonstrated severe weight loss and two of the females died. No deaths were observed at 75 mg/kg body weight, but moderate weight loss and decreased feed consumption were evident. Based on these data, dose levels of 0, 10, 40 and 80 mg/kg body weight were chosen for the main study.

Effects noted in pups:

Following effects were noted in the embryo/fetus:

- reduced live fetuses per litter at 80 mg/kg bw/day (highest dose level)
- decreased nidations at 80 mg/kg bw/day (highest dose level)
- reduced body weight (10% biologically significant) at 80 mg/kg bw/day (highest dose level)
- increased malformations at 80 mg/kg bw/day (highest dose level)

Table 46:

Dose (mg/kg/day)	0 mg/kg	5 mg/kg	20 mg/kg	80 mg/kg
No. examined: fetuses	130	138	153	64
Litters	(16)	(17)	(17)	(11)
External				
No. affected	0	0	1(1)	1(1)
Abdomen-Gastroschisis	-	-	-	1(1) ^c
Head-Exencephaly w/open eye	-	-	-	1(1) ^c
Paw-Clubbed	-	-	-	1(1) ^c
Umbilicus-Hernia	-	-	1(1)	-
Visceral				
No. affected	0	0	0	1(1)
Kidney-No papilla (Size 0)	-	-	-	$1(1)^{d}$
Head				
No. affected	0	1(1)	1(1)	3(2)
Brain-Hydrocephaly	-	-	1(1)b	-
Eye-Cataract	-	1(1)	-	2(1) ^d
Skeletal				
No. affected	0	1(1)	1(1)	3(2)
Ribs-Fused	-	1(1) ^a	-	1(1) ^e
Sternebra-Fused	-	-	1(1) ^b	-
Vertebra-Hemivertebra	-	1(1) ^a	-	3(2) ^e
Total number affected	0(0)	2(2)	2(2)	6(4)
Mean percent affected per litter	0	1.6	1.3	13.4*

*Statistically significant, p<0.05

a-e Same fetus affected

Discussion and conclusion:

- Decreased live fetuses were noted at the highest dose level in the presence of maternal toxicity.

- Decreased nidations were noted at the highest dose level in the presence of maternal toxicity. As no significant difference in the mean number of corpora lutea per litter was observed, the reason for the decrease in nidations was not clear.

- Reduced fetal weights were noted at maternally toxicity doses. Because of the magnitude of effect on body weight (bodyweight loss:-325 g) and food consumption (48% reduction) this effect could be secondary to maternal toxicity.

-Increased malformations were noted at the highest dose level in the presence of maternal toxicity. Malformations within affected high-dose litters occurred at low incidences (1 to 2/litter) and were without a pattern of specific malformations. Furthermore, the increase in percent affected per litter was primarily due to malformations that occurred in small litters. The mean percentage of foetuses with developmental variations

was significantly increased at the low dose level. No significant differences in the rates of variations due to retarded development, or in the mean percent of foetuses with variations were observed.

<u>As a conclusion</u>, the effects noted in the rabbit developmental toxicity study were not sufficient to trigger a proposal for classification for this hazard category.

Table 47: Summary table of human data on adverse effects on development

No data.

Table 48: Summary table of other studies relevant for developmental toxicity

No data.

10.10.4 Short summary and overall relevance of the provided information on adverse effects on development

Studies are available on developmental toxicity in rats and rabbits. The studies are thoroughly presented in Vol. 3 to the RAR.

In the rat developmental toxicity study (RAR Vol. 3, B.6.6.2.1/01), maternal findings were noted at 125 mg/kg bw/day and above. The maternal findings included reduced bodyweight growth, reduced food consumption and organ weight changes (indicating liver toxicity) noted in the dams at 125 mg/kg bw/day and above, and clinical signs (increased salivation) and stomach ulceration noted in dams at 500 mg/kg bw/day. Foetal effects consisted of reduced body weight and increased incidence of skeletal alterations noted at 125 mg/kg bw/day and above, increased resorptions and foetal deaths noted at 500 mg/kg bw/day, and oedema noted at 500 mg/kg bw/day. The increased incidence of skeletal alterations consisted of dosage-dependent increases in the litter incidences of incomplete ossification of the thoracic and caudal vertebrae, sternebrae, xiphoid and pubes noted in the middle and high dosage groups. Bifid thoracic vertebral centra was also significantly increased for the 125 and 500 mg/kg groups. In addition the observations of oedema, enlarged fontanelle (one animal), unossified supraoccipital, altered ossification of lumbar and sacral vertebrae and unossified metacarpals and metatarsals in high dosage group foetuses were also considered treatment-related, although not significantly increased. The classification of foetal alterations were reported in Supplement No. 1, to the main study (RAR Vol. 3, B.6.6.2.1/01). At the time of the report, foetal alterations were not classified as "malformations" or "variations". Therefore, the individual fetal alterations and their classification as variations or malformations were reconducted by the applicant (additional data submitted during the peer-review of the active substance) and is presented in table below:

Table 49: Indicidual fetal alterations reported in the rat developmental toxicity study (additional data submitted by applicant during peer-review)

Dose group	Alteration
0 mg/kg bw/day	
Dam 28002, foetus 11	Thread-like tail (M)
Dam 21013, foetuses 5 and 11	Lung, left lobe lowest lobule absent (V)
20 mg/kg bw/day	

No foetuses reported with a malformation	-
125 mg/kg bw/day	
Dam 28051, foetus 10	Brain- lateral and third ventricles slightly dilated (V)
Dam 28069, foetus 7	Right subclavian and right carotid arteries pass to the left of the trachea and esophagus (V)
Dam 28071, foetus 1	Hemivertebra (M)
500 mg/kg bw/day	
Dam 28085, foetus 4	Body short and slightly edemoatous (V), Hemivertebra (M), fused ribs (M)
Dam 28086, foetus 1	Thread-like tail (M)
Dam 28095, foetus 10	Mulitple malformations (umbilical hernia, heart apex rounded, undescended testes, diaphragm absent, kidneys absent, ectopic adrenals, fused ribs) (M)
Dam 28099, foetuses 1, 2, 8	Edematous (V or M depending upon extent of edema)

M: malformation

V: variation

In the rabbit developmental toxicity study (RAR Vol. 3, B.6.6.2.2/01), maternal findings were noted at the highest dose level of 80 mg/kg bw/day. The maternal findings consisted of mortalities (two females), clinical signs (abortions) and reduced body weight gain noted in dams at 80 mg/kg bw/day. One middle dose female (20 mg/kg bw/day group) were also found dead. This animal had multiple mucosal haemorrhages in the stomach associated with a trichobezoar and died on gestation day 29 just prior to scheduled sacrifice. Whether this death was associated with the abortion process, disease, INL-5300 treatment or a combination of these factors could not be determined according to the study author. Foetal toxicity consisted of reduced body weight (10%, biologically significant), decreased live fetuses, nidations, and an increase in malformations noted at 80 mg/kg bw/day.

10.10.5 Comparison with the CLP criteria

According to Regulation 1272/2008 (CLP), substances are classified for reproductive toxicity in Category 1A (known human reproductive toxicant) based largely on evidence from humans or in 1B (presumed human reproductive toxicant) or 2 (suspected human reproductive toxicant) largely based on animal data. The animal data required for 1B classification "shall provide clear evidence of an adverse effect on sexual function or on development in the absence of other toxic effects, or if occurring together with other toxic effects the adverse effect on reproduction is considered not to be a secondary non-specific consequence of other toxic effects".

Substances are classified in Category 2 when there is "some evidence from humans or experimental animals... of an adverse effect on sexual function or on development, and where the evidence is not sufficiently convincing to place the substance in Category 1"

As there is no human data available for tribenuron-methyl, the criteria for category 1A are not fulfilled. The effects noted in the studies that are considered potentially relevant for classification are resorptions, deaths and skeletal effects noted in rats, and deaths, nidations, and malformations noted in rabbits.

10.10.6 Adverse effects on or via lactation

Table 50: Summary table of animal studies on effects on or via lactation

Test	Species	Doses	Results	Reference
substance	Strain	Exposure Period		

Test type	Sex			
Route of	No./group			
exposure	Vehicle			
Method				
Guideline				
Tribenuron- methyl Purity: 94.2% Two- generation reproduction toxicity study Oral (dietary) U.S. EPA 83-4 (1982)	Rat Crl:CD®(SD)BR M, F 23/sex/dose	0, 25, 250, 1000 ppm This corresponds to 70-day mean daily intakes of 0, 1.9, 19, and 75 mg/kg bw/day and 0, 2.15, 21.3 and 88 mg/kg bw/day for male and female animals, respectively. The mean daily intakes during gestation were: 0, 2, 20 and 85, and 0, 2, 20 and 78 mg/kg bw/day for the first and second F0 animals, respectively, and 0, 1.8, 18 and 76, and 0, 2, 20 and 79 mg/kg bw/day for the first and second generation F1 animals. Throughout this study, rats were fed diets that contained the test substance. After 70 days on test, the F0 generation was bred to produce the F1A and F1B litters. At weaning, randomly selected F1A rats were fed diets containing the test substance for 80 days and then mated to produce F2A and F2B litters. 3 weeks prior to mating and during the mating period. In males treatment was continued throughout the mating period and until killing shortly thereafter. In females treatment was continued throughout pregnancy and lactation period.	25 ppm: No effects 250 ppm: Parental: ↓ bw (F1A females: 4-11%) ↓ bw gain (F0 males: Day 0- 70: 7%; F1A females: premating day 0-77: 13%) ↓ FC (F1A females) Offsprings: ↓ bw (F1B pups: 8%; F2B pups 9%) -organ weight changes in F2B weanlings (\uparrow rel testes, ↓ abs spleen (M, F), \downarrow rel spleen (both sexes, s.s. in F only), \downarrow abs liver (both sexes, s.s. in M only), \uparrow rel lung (both sexes, s.s. in M only), and \downarrow abs thymus (F, n.s.), \downarrow abs heart (F, n.s.)) 1000 ppm: Parental: ↓ bw (F0 males: 16%; F1A males: 16%; F0 females: 16% (premating), 11% (1st and 2nd gestations), 6% (1st lactation), 12% (2nd lactation), F1A: 13-22%) ↓ bw gain (F0 males (Day 0- 70: 19%, Day 70-168: 24%); F0 females: 29% (premating); F1A females: 25% (premating Day 0-77) ↓FC (F0 and F1 males and females) -organ weight changes (\uparrow rel testes (F0 and F1 males and females) -organ weight changes (\uparrow rel testes (F0 and F1A)) Offsprings: -clinical signs (sparse fur, F2-generation)	RAR Vol. 3 B.6.6.1/01 Key study

Tribenuron- methyl One- generation reproduction toxicity study Oral (dietary) No Guideline There are limitations with regard to number of animals used in the study and pathology (testes and epididymides were not weighed. No histopathology was performed).	Rat Cr1:CD®(SD)BR M, F 16/sex/dose	0, 100, 1750, 5000 ppm (correspond to 0, 7, 118, and 335 mg/kg bw/day in males; 0, 8, 135, and 386 mg/kg bw/day in females) 90 day prior to mating and throughout the study	↓bw (F1A pups: 9%; F1B pups: 16%; F2A pups: 10%; F2B pups: 12%) -organ weight changes in F2B weanlings (↓ abs spleen (M, F), ↓ rel spleen (both sexes, s.s. in F only), ↓ abs liver (both sexes, s.s. in M only), ↑ rel lung (both sexes, s.s. in M only), and ↓ abs thymus (F, n.s.), ↓ abs heart (F, n.s.), ↓ abs kidney (F)) <i>NOAEL: Parental and</i> <i>offspring: 25 ppm</i> (<i>approximately 2 mg/kg</i> <i>bw/day</i>) <i>NOAEL: Reproductive:</i> ≥1000 ppm (<i>approximately</i> 75 and 88 mg/kg <i>bw/day in</i> <i>males and females</i> , <i>respectively</i>) <u>100 ppm:</u> No effects <u>1750 ppm:</u> Dams: ↓ bw (15%) <u>Offsprings:</u> ↓ bw (Day 21: 19%) <u>5000 ppm:</u> Dams: ↓ bw (23%) <u>Offsprings:</u> ↓ pup viability (Day 0-4: 19% per litter, Day 1-4: 14% per litter) ↓ bw (Day 21: 36%)	RAR Vol. 3 B.6.6.1/02 Key study
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M: males

F: females s.s.: statistically significant n.s. : not statistically significant

Table 51: Summary table of human data on effects on or via lactation

No data.

Table 52: Summary table of other studies relevant for effects on or via lactation

No data.

10.10.7 Short summary and overall relevance of the provided information on effects on or via lactation

In the two-generation toxicity study (RAR, Vol. 3, B.6.6.1/01) decreased bodyweight was noted in pups from 250 ppm (20 mg/kg bw/day) (F1B pups: 8%; F2B pups: 9%) and 1000 ppm (F1A pups: 9%; F1B pups: 16%; F2A pups: 10%; F2B pups: 12%). Furthermore organweight changes were noted in F2 weanlings from 250 ppm. Organs that showed statistically significant weight changes were: testes, spleen, liver, kidneys (females only) and lungs. Other organs that showed weight changes were thymus (females) and heart (females) but these changes were not statistically significant. The effects on offsprings were noted at doses that also caused reduced bodyweight growth in dams (At 250 ppm: F1A females: 4-11%).

In the one-generation toxicity study (RAR Vol. 3, B.6.6.1/02), treatment was associated with reduced pup weight noted at 1750 ppm (118 mg/kg bw/day) (19%) and 5000 ppm (36%), and reduced pup viability noted at 5000 ppm. These effects on offspring weights and viability were noted at doses that also caused reduced bodyweight in dams (1750 ppm: 15%; 5000 ppm: 23%).

10.10.7.1 Comparison with the CLP criteria

According to the CLP Guidance Table 3.7.1(b) a substance should be classified for lactation effects when the following applies:

"(a) human evidence indicating a hazard to babies during the lactation period; and /or

(b) results of one or two generation studies in animals which provide clear evidence of adverse effect in the offspring due to transfer in the milk or adverse effect on the quality of the milk; and/or

(c) absorption, metabolism, distribution and excretion studies that indicate the likehood that the substance is present in potentially toxic levels in breast milk."

No data is available to address criterias (a) and (c). A reduction in pup weight was observed. However the effect was noted in the presence of maternal toxicity. Thus the effect on bodyweight growth is not considered "provide clear evidence of adverse effect in the offspring due to transfer in the milk".

10.10.8 Conclusion on classification and labelling for reproductive toxicity

No classification is proposed for tribenuron-methyl

10.11 Specific target organ toxicity-single exposure

Table 53:	Summary	table of	animal	studies of	on STOT SE
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Method, guideline, deviations if any, species, strain, sex, no/group	Test substance, route of exposure, dose levels, duration of exposure	Results	Reference	
Acute oral,	Tribenuron-methyl technical	>5000	RAR Vol. 3	
OECD 401	5000 mg/kg bw,	mg/kg bw	B.6.2.1/01	
Rat, Crl:CD [®] (SD)IGS BR	Observations in 14 days			
5/sex/dose				
Acute dermal,	Tribenuron-methyl technical	>5000	RAR Vol. 3	
OECD 402	5000 mg/kg bw,	mg/kg bw	B.6.2.2	
Rat, Crl:CD [®] (SD)IGS BR	Observations in 14 days			
5/sex/dose				
Acute inhalation,	Tribenuron-methyl technical, fine powder,	>6.0 mg/L	RAR Vol. 3	
OECD 403	(MMAD 2.8 or 2.7 µm)		B.6.2.3/01	
Rat, Crl:CD [®] (SD)IGS BR	6.0 mg/L,			
5/sex/dose	4 hour, nose only			
	14 days observation			
Oral (gavage)	Tribenuron-methyl	$\frac{100 \text{ mg/kg}}{100 \text{ mg/kg}}$	RAR Vol. 3	
Acute neurotoxicity	Purity: 98.2%	<u>bw/day:</u>	B.6.7.1.1/01	
OECD 424	0, 100, 300, 1000 mg/kg bw	No effects		
Rat	Vehicle: 0.5% methyl cellulose			
Crl:CD(SD)		<u>300 mg/kg</u> <u>bw:</u>		
12/sex/dose		\downarrow FC (M,F)		
		↓ food efficiency (M, F)		
		<u>1000 mg/kg</u> <u>bw:</u>		
		↓bw (F:7%)		
		↓FC (M,F)		
		↓ food efficiency (M, F)		

M: males F: females

Table 54: Summary table of human data on STOT SE

No data.

Table 55: Summary table of other studies relevant for STOT SE

No Data.

10.11.1.1 Short summary and overall relevance of the provided information on specific target organ toxicity – single exposure

All acute toxicity studies were conducted in accordance with the OECD Principles of Good Laboratory Practice (1981). The acute toxicity of tribenuron-methyl after oral, dermal or inhalation exposure was low.

One female showed a red-stained face on day 2 after oral exposure. Other clinical signs observed in the four other females started from day 8 and included red-stained head, hunched over posture, and ruffled fur. No clinical signs were observed after day 10. No body weight losses occurred in male rats. Weight loss up to 9 % from day 2 until day 11 was registered in females. However, the final body weight of all female rats surpassed their fasted body weight. No gross lesions were present in the rats at necropsy.

After dermal exposure several rats exhibited wet or yellow-stained perineum, swollen face or legs, ocular or nasal discharge, or stained fur on the day of and the day after application of the test substance but no dermal effects was observed after day 13.

Eye, nasal and/or oral discharges, irregular respiration and stained fur were observed immediately after inhalation exposure. All rats showed a slight body weight loss the day following exposure. In male rats a body weight loss of 0.35 - 4% of the initial weight was observed, and in female rats 1.0 - 2.0%. All rats showed an overall weight gain by the end of the 14-days recovery period.

In the acute neurotoxicity study (RAR Vol. 3, B.6.7.1.1/01), there seems to be an initial depression in motor activity duration in both male and female rats given 1000 mg/kg bw of the test substance in the first thirty minutes of the motor activity assessment on day 0. However, this decreased activity was not present on day 7 or 14. Treatment was associated with reduced bodyweight of 1000 mg/kg bw females (7%) compared to control rat, on test day 7. Furthermore, food consumption and food efficiency were reduced in 300 and 1000 mg/kg bw males and females. No treatment-related findings were noted during FOB investigation. *Comment: The NOAEL in the study will be discussed at expert-meeting*.

10.11.1.2 Comparison with the CLP criteria

According to the CLP Guidance, specific target organ toxicity (single exposure) is defined as specific, nonlethal target organ toxicity arising from a single exposure to a substance or mixture, which are not covered by the other hazard classes. Regulation EC No 1272/2008 (CLP), Annex 1: 8.2.1.7.3, states for STOT SE: "...Evidence from appropriate studies in experimental animals can furnish much more detail, in the form of clinical observations, and macroscipoic and microscopic pathological examination, and this can often reveal hazards that may not be life-threatening but could indicate functional impairment. Consequently all available evidence, and relevance to human health, must be taken into consideration in the classification process, including but not limited to the following effects in humans and/or animals:...(b) Significant functional changes, more than transient in nature, in the respiratory system, central or peripheral nervous systems, other organs or other organ systems, including signs of central nervous system depression and effects on special senses (such as sight, hearing and sense of smell)..."

In the acute toxicity studies performed, no specific target organ toxicity were noted. In the acute neurotoxicity study an initial depression in motor activity duration in both male and female rats given 1000 mg/kg bw of the test substance was noted on day 0. However, this decreased activity was not present on day 7 or 14. Thus the effect was transient in nature.

10.11.1.3 Conclusion on classification and labelling for STOT SE

No classification is proposed for tribenuron-methyl.

10.12 Specific target organ toxicity-repeated exposure Table 56: Summary table of animal studies on STOT RE

Test substance	Species	Dose levels	ose levels Main findings	
Route	Strain			
Duration of study	Sex			
Guideline	No./group			
	Vehicle			
Tribenuron-methyl	Rat	Main study: 0,	<u>30 mg/kg bw/day:</u>	RAR Vol. 3
Purity: 96.3%	Sprague	100, 300, 1000 mg/kg bw/day	No treatment-related effects	B.6.3.1.1/01
Oral	Dawley	Parallel study:		
(gavage)	(SPF quality, randomly bred)	0, 30, 100, 300	<u>100 mg/kg bw/day:</u>	
28-day	M, F	mg/kg bw/day	-organ weight changes (↑ rel.	
EEC Method B.7 (1984)	6/sex/dose		liver weight, 11%, F)	
Assessment of reactivity to stimuli of different types, grip	Propylene glycol		<u>300 mg/kg bw/day:</u>	
strength and motor activity not conducted, urinalysis not			\downarrow bw gain (F: 36%)	
performed, histopathology			\downarrow FC (F)	
determined, thyroid hormones not determined			-changes in biochemical parameters (\uparrow ALT (M,F), \uparrow Ca serum (M,F), \downarrow total bilirubin (M))	
			-organ weight changes (\uparrow rel. liver weight, (M,F), \uparrow abs liver weight (F))	
			-histopathological changes in the liver (hyperthrophy of centrilobular hepatocytes (M,F))	
			<u>1000 mg/kg bw/day:</u>	
			-clinical signs (piloerection, lethargy, emaciation, reduced defecation (M,F))	
			↓ bw (M: 21%, F: 23%)	
			↓ bw gain (M: 45%, F: 58%)	
			↓ FC (M: 18%, F: 28%)	
			-changes in biochemical parameters (\uparrow ALT (M,F), \downarrow AST (M), \uparrow serum Ca (M,F), \downarrow total bilirubin (M))	

5000 ppm	RAR Vol. 3 B.6.3.2.1/01
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Tribenuron methyl Purity: 98% Oral (dietary) 28-day range finding study U.S. EPA 82-1 (1982) Limited parameters investigated (dose range finding study)	Mouse Cr1:CD®- 1(ICR)BR M, F 10/sex/dose	0, 125, 500, 1250, 2500, 5000 ppm (equivalent to 0, 25, 100, 250, 500 and 1000 mg/kg bw/day using a default conversion factor of 0.2)	↓ bw gain (M: 40%, F: 48%) ↓ FC (M, F) (not stat. sign.) -changes in haematological parameters (increased platelet counts at 1 and 3 months (F) -changes in biochemical parameters (↓ glucose (M,F), ↓ total protein (M), ↓ serum globulin (M), ↑ serum cholesterol (F)) -organ weight changes (↑ rel. brain weight (M,F), ↓ abs brain weight (M), ↑ rel. heart weight (M,F), ↓ abs heart weight (M,F) ↑ rel. liver weight (M,F), ↓ abs liver weight (M, F), ↑ rel. kidney weight (M, F), ↑ rel testes weight, ↑ rel spleen weight (M: 38%, F: 36%)) <u>125 and 500 ppm:</u> No treatment-related effect <u>1250 ppm:</u> -organ weight changes (↑ rel liver weight (M: 11%, F:11%)) <u>2500 ppm:</u> -organ weight changes (↑ abs and rel liver weights (M: 15%, F: 18%), ↑ rel spleen weight (M: 18%)) <u>5000 ppm:</u> ↓ bw (M: 5%) ↓ bw gain (M: 34%) -organ weight changes (↑ abs and rel liver weight (M: 21%, F: 29%), (↑ rel spleen weight (M: 29%)) <i>Study accepted for dose selection</i>	RAR Vol. 3 B.6.3.2.2/01
			-organ weight changes (↑ abs and rel liver weight (M: 21%, F: 29%), (↑ rel spleen weight (M: 29%))	
Tribenuron methyl	Mouse	0, 125, 500 and	Study accepted for dose selection but not for NOAEL setting 125 and 500 ppm:	RAR Vol. 3
Purity 98% Oral (dietary) 90-day	Crl:CD®- 1(ICR)BR M, F	2500 ppm (equivalent to 0, 18, 70 and 350 mg/kg bw/day in males; 0, 24, 90	No treatment-related effects 2500 ppm:	B.6.3.2.2/01

U.S. EPA 82-1 (1982)	10/sex/dose	and 476 mg/kg	↓ bw gain (F: 42%)	
Ophtalmology not performed, assessment of reactivity to stimuli of different types, grip strength and motor ativity not conducted, neurobehavioural assessment not conducted, no measurements of coagulation function, clinical biochemistry not determined, no microscopical examination of spinal cord, mammary gland, peripheral nerve		bw/day in females)	-organ weight changes (↑ abs. and rel. liver weight (F), ↑ rel. liver weight (M)) NOAEL both sexes: 500 ppm (70 and 90 mg/kg bw/day in males and females, respectively)	
Tribenuron methyl	Dog	0. 50, 500 and	50 and 500 ppm	RAR Vol. 3
Purity: 96.8% Oral (dietary)	Beagle M, F	2500 ppm (equivalent to 0, 1.5, 15 and 73	No treatment-related effects	B.6.3.2.3/01
90-day	4/sex/dose	mg/kg bw/day in males, and 0, 1.6,	<u>2500 ppm:</u>	
U.S. EPA 82-1 (1982)		15 and 78 mg/kg	\downarrow bw (M: 6% (n.s.))	
Opthlamology not evaluated, no measurements of coagulation functionbw/day in females)				
			-organ weight changes (↑ absolute thyroid/parathyroid weights (M: 30% (n.s), F: 48% (s.s), ↑ relative thyroid/parathyroid weights (M: 38% (n.s), F: 34% (n.s))	
			NOAEL both sexes: 500 ppm (15 mg/kg bw/day)	
Tribenuron methyl	Dog	0, 25, 250 and	25 and 250 ppm:	RAR Vol. 3
Purity: 96.8% Oral (dietary)	Beagle M, F	1500 ppm (equivalent to 0, 0.79, 8.16 and	No treatment-related effects	B.6.3.3.1/01
1-year	5/sex/dose	51.5 mg/kg bw/day in males;	<u>1500 ppm:</u>	
U.S. EPA 83-1 (1982) 0, 0. 52 m	0, 0.90, 8.18 and 52 mg/kg bw/day	↓ bw (M: 2-11%, F: 4-8%) (not statistically significant)		
		in females)	↓ bw gain (M: 20%, F: 18%) (not statistically significant)	
			- changes in biochemical parameters (↑ serum creatinine concentrations (M, F))	
			NOAEL both sexes: 250 ppm (8 mg/kg bw/day)	

Tribenuron-methyl	Rabbit	0, 1000 mg/kg	<u>1000 mg/kg bw/day:</u>	RAR Vol 3
Purity: 97.7%	New Zealand	bw/day	-clinical signs (dermal irritation)	B.6.8.2.3/01
Dermal	White		↓bw (M: 12%)	
28-day	M, F		↓bw gain (M: 91%; F:76%)	
EEC Method B.9 (1984)	6/sex/dose		\downarrow FC (M, F)	
No measurement of haematocrit in the			-changes in haematological parameters (↓RBC, Hb, PCV (M))	
haematology examination, no measurement of ornithine decarboxylase and gamma glutamyl transpeptidase in the			-changes in biochemical parameters (↓inorganic phosphorus level, ↓ALT, stat. sign in males only) (M, F)	
blood biochemistry examination			-organ weight changes (↑rel. kidney weight (M);↑ rel. brain weight (F))	
			-histopathological changes in skin and kidney (skin and application site: inflammatory reaction together with epidermal or dermal degeneration/necrosis, acanthosis, hyperkeratosis, oedema, vascular ectasia and haemorrhage; kidney: bilateral multifocal marked nephrocalcinosis together with kidney tubular degeneration/necrosis).	
			NOAEL: not established	
			LOAEL: 1000 mg/kg bw/day	
Tribenuron-methyl Purity: 98.2% Immunotoxicity feeding study 28-day OPPTS 870.7800 (1998)	Rat Crl:CD(SD) F 10/dose	0, 50, 150, 300, and 600 ppm 0, 3.8, 11, 23, and 44 mg/kg bw/day	No test substance-related effects were observed on 1) gross pathology; 2) absolute and relative brain, spleen, and thymus weights; or 3) humoral immune response.	RAR Vol 3 B.6.8.2.2/01
			11 ma/lea huu/dau	
Parameters evaluated limited			44 mg/kg bw/day	
to bodyweight gain, food			mean body weights \downarrow 7.4%	
consumption, food efficiency, clinical signs, gross pathology, humoral immune response, and organ weights			body weight gains $\downarrow 24.3\%$ food efficiency $\downarrow 15.9\%$	
. esponso, and organ weights			NOAEL systemic toxicity: 300 ppm (23 mg/kg bw/day)	
			NOAEL immunotoxicity: ≥600 ppm	
Tribenuron-methyl	Rat	0, 50, 200, 700	50 and 200 ppm	RAR Vol. 3
Purity: 98.2%	Crl:CD(SD)	ppm (correspond to 0, 2.8, 11.3,	No effects	B.6.7.1.2/01
Oral (dietary)	12/sex/dose	40.1 mg/kg bw/day in males;	<u>700 ppm:</u>	

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Subchronic neurotoxicity		0, 3.2, 12.8, 46.6	↓ bw (M: 12%, F:13%)	
OECD 424		mg/kg bw/day in females)	↓ bw gain (M: 20%; F: 29%)	
Tribenuron-methyl	Rabbit	0, 5, 20, 80	Maternal effects:	RAR Vol. 3
Purity: 94.2%	Hra:(NZW)SPF	mg/kg bw/day	<u>5 mg/kg bw/day:</u>	B.6.6.2.2/01
Developmental toxicity study	22/dose group		No effects	
Oral (gavage)				
U.S. EPA 83-3 (1982)	0.5% aqueous		<u>20 mg/kg bw/day:</u>	
	methyl cellulose		- mortality (one dam)	
			80 mg/kg bw/day:	
			-mortality (two dams)	
			-clinical signs (abortions, 6 animals compared to one control animal)	
			-bw loss (-325 g)	
			↓FC (48%)	
			Developmental effects:	
			5 and 20 mg/kg bw/day:	
			No effects	
			<u>80 mg/kg bw/day:</u>	
			↓ bw gain (10%, biologically significant)	
			↓ live fetuses, total (5.8 compared to 8.1 in control group)	
			↓ nidations (6.5 compared to 8.9 in control group)	
			↑malformations (mean % affected/litter: 13.4% compared to 0% in control group)	
Tribenuron-methyl	Crl:CD/BR rats	0, 25, 250 and	No mortality but general toxicity	RAR Vol. 3
Purity: 96.8%		1250 ppm corresponding in	without a specific target organ. Mean body weights were	B.6.5.1/01
Two year combined chronic toxicity/oncogenicity long-		male to: 0, 0.95, 10, 55 mg/kg	decreased by 43% and 29% for female and male rats,	
term feeding study in rats.		bw/day and in	respectively, in 1250 ppm dose	
Oral via dietary admixture		female: 0, 1.2, 13, 76 mg/kg	groups. Body weight gains were decreased in the highest dose by	
OECD TG 453		bw/day	36% and 53% in the males and	
			females, respectively. Body weight gain was also significantly decreased in 250 ppm females by 27%.	
			Significant increase in mammary gland adenocarcinomas was	

			noted in females in of the high-	
			dose level group.	
			There were also several systemic non-neoplastic effects in the male 250 and 1250 ppm dose groups and in the female 1250 ppm dose group when compared to controls (mineralisation of stomach and aorta, spleen lymphoid depletion, increased pancreas polyarteritis, reduced secretion from seminal vesicles, liver fatty change, bilateral dilatation in renal pelvis, uterus dilatation and renal degeneration). However, a specific target organ was not identified for non-neoplastic effects in male rats.	
			The NOAEL of tribenuron- methyl in rat in long-term feeding was 25 ppm (corresponding to around 1 mg/kg bw per day) based on reduced bodyweight gain in females noted at \geq 250 ppm and in males noted at 1250 ppm, reduced bodyweight noted in both sexes at 1250 ppm, organ weight changes, non-neoplastic histopathological findings in males at \geq 250 ppm and in females at 1250 ppm, and an significant increase incidence of total mammary adenocarcinomas in female rats at the high-dose level (1250 ppm).	
Tribenuron-methyl Purity: 94.2% Oncogenicity study, eighteen- month feeding study in mice OECD TG 453	Crl:CD [®] - 1(ICR)BR mice	0, 20, 200 and 1500 ppm; corresponding in male to: 0, 2.5, 25 and 197 mg/kg/day and in female: 0, 3.1, 31 and 247 mg/kg/day, respectively	None of the clinical signs that were observed were considered to be test substance-related. The incidence of mortality was similar among the treatment and control groups. Mean body weights, mean body weight gain and food consumption in the treated group were similar to controls except that statistically significant decreased (20%) bodyweight gain was noted in females of the highest dose group.	Vol. 3 B.6.5.2
			The relative liver weight in liver increased (19%) in males at the high dose group. Histopathology data revealed several minor modifications in the normal lesions of ageing within the male and female 1500 ppm dose groups when compared	

to their respective control groups.
In addition, secondary changes
observed in a few organs (testes,
thyroid, and epididymis) were
considered to be directly related
to the amyloidosis observed and
to the slightly catabolic condition
seen in these groups.
No compound-related increases
in the incidence of tumours were
observed in this study. The
NOAEL was 20 ppm (2.5 mg/kg
bw/day) based on the effects seen
in males; amyloidosis and
bilateral oligospermia in the 200
ppm (25 mg/kg bw) dose groups
and reduced bodyweight gain
noted in females at 1500 ppm.
No compound-related
increases in the incidence of
tumours were observed in this
study. The NOAEL was 20
ppm (2.5 mg/kg bw/day)
based on the effects seen in
males; amyloidosis and
bilateral oligospermia in the
200 ppm (25 mg/kg bw) dose
groups and reduced
bodyweight gain noted in
females at 1500 ppm

M: males F: females

Table 57: Summary table of human data on STOT RE

No data.

Table 58: Summary table of other studies relevant for STOT RE

No data.

10.12.1.1 Short summary and overall relevance of the provided information on specific target organ toxicity – repeated exposure

All studies are thoroughly presented in Volume 3 to the RAR.

Two short-term oral toxicity studies with tribenuron-methyl are available with rats (one 28-day toxicity study and one 90- day toxicity study. A 90-day oral toxicity and a dose-range finding study are available with mice. Short-term oral toxicity was also tested in dogs (one 90-day toxicity study and 1-year toxicity study). Furthermore a 28-day immunotoxicity feeding study in rats and 28-day dermal toxicity study in rabbits are available.

In the 28-day oral toxicity study in rats, the liver appeared to be the primary target organ as evidenced by a dose related increase of its weight noted in females at \geq 100 mg/kg bw/day and in males at \geq 300 mg/kg bw/day, combined with elevated blood serum alanine aminotransferase levels (ALT) noted in both sexes at

 \geq 300 mg/kg bw/day. Moreover, histopathological examination of the liver tissue showed a slight to welldefined hypertrophy of centrilobular hepatocytes in the 300 and 1000 mg/kg bw/day dose groups. Clinical signs (piloerection, lethargy, emaciation, reduced defecation) were also noted in the study (both sexes at 1000 mg/kg bw/day). Furthermore, effects on body weight growth (reduced bodyweight/bodyweight gain) and reduced food consumption were noted in females at \geq 300 mg/kg bw/day and in males at 1000 mg/kg bw/day. In addition changes in organweights were noted for the kidney, testes, spleen and adrenal at 1000 mg/kg bw/day. There was also an increase in serum calcium concentrations noted in both sexes at \geq 300 mg/kg bw/day and decreased bilirubin concentrations noted in males at \geq 300 mg/kg bw/day.

In the 90-day oral toxicity study in rats, treatment was associated with mortality (one female due to cachexia) noted at 5000 ppm (386 mg/kg bw/day). Effects on the liver consisted of changes in biochemical parameters noted in both sexes at \geq 1750 ppm and increased liver weights noted in females at \geq 1750 ppm and in males at 5000 ppm. Changes in biochemical parameters noted at \geq 1750 ppm consisted of decreased total protein concentrations (in males), decreased serum globulin (in males), decreased glucose (in both sexes) and increased serum cholesterol (in females). Clinical signs (coloured discharge from the nose) were noted in males at 1750 ppm and 5000 ppm. Furthermore effects on body weight growth (reduced bodyweight and bodyweight gain) were noted in both sexes at \geq 1750 ppm. Changes in organweights were also noted for the spleen (at \geq 100 ppm), and the brain, heart, kidney and testes (at \geq 1750 ppm). In addition, changes in haematological parameters were noted in females at \geq 1750 ppm and consisted of increased platelet counts at 1 and 3 Months. *The relevant NOAEL in the study will be discussed at expert-meeting*.

In the 28-day range finding study in mice, treatment was associated with effects on body weight growth (reduced body weight and bodyweight gain) noted in males at 5000 ppm and organ weight changes noted in both sexes at \geq 1250 ppm (250 mg/kg bw/day). The organweight changes consisted of increased liver weights noted in both sexes at \geq 1250 ppm, and increased spleen weights noted in males at \geq 2500 ppm.

In the 90-day oral toxicity study in mice, treatment was associated with effects on body weight growth (reduced bodyweight gain) noted in females at 2500 ppm (476 mg/kg bw/day), and organ weight changes noted in both sexes at 2500 ppm (increased liver weights) (350 and 476 mg/kg bw/day in males and females, respectively).

In the 90-day feeding study in dogs, treatment was associated with reduced body weight noted in males at 2500 ppm (73 mg/kg bw/day). Changes in haematological parameters were also noted in males at 2500 ppm and consisted of increased mean platelets at Month 3, increased mean total leukocyte counts at Month 3, decreased mean corpuscular haemoglobin concentration at Month 2 (n.s). Organ weight changes were noted at 2500 ppm (73 and 78 mg/kg bw/day in males and females, respectively) (in males: increased absolute and relative thyroid/parathyroid weight (n.s.); in females: increased absolute thyroid/parathyroid weight (s.s.), increased relative thyroid/parathyroid weight (n.s.))

In the 28-day dermal toxicity study in rabbits (limit dose study), treatment at the limit dose of 1000 mg/kg bw/day was associated with clinical signs of dermal irritation (scabs, necrosis and pustulae). One male and one female were found dead (on day 29 and day 24, respectively) without clinical signs preceding the death and no macroscopic abnormalities or microscopic findings were noted that could explain the death. Furthermore, effects on bodyweight growth (reduced bodyweight amd bodyweightgain), and reduced food consumption were noted in both sexes. Changes in haematological parameters (reduced RBC, Hb, PCV) were noted in males. Changes in biochemical parameters were noted in both sexes and consisted of reduced inorganic phosphorus level, reduced ALP activity (s.s. in males only). Organ weight changes were also noted (males: increased relative kidney weight; females: increased relative brain weight). Macroscopic findings of skin effects consisted of scabs, induration, haematomas, necrosis abscess formation at the application site and histopathological changes (skin and application site) consisted of inflammatory reaction together with epidermal or dermal degeneration/necrosis, acanthosis, hyperkeratosis, oedema, vascular ectasia and haemorrhage. Histopathological changes in the kidney were noted and consisted of bilateral multifocal marked nephrocalcinosis together with kidney tubular degeneration/necrosis.

Table 59: Histopathological findings in 28 days dermal toxicity study in rabbit

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	0 mg/kg	bw/day	1000 mg/	kg bw/day
Number of rats/group	6		6	
	М	F	М	F
Skin				I
Degen./Necr./Epider.	0	0	1	1
Degen./Necr./Dermis.	0	0	1	1
Acanthosis	0	0	1	1
Oedema	0	0	1	1
Haemorrhage	0	0	1	0
Inflammatory Cell Aggregation	0	0	1	1
Application site				
Ancanthosis	0	2	4	3
Hyperkeratosis	0	2	3	3
Degen./Necr./Epider.	0	0	2	3
Degen./Necr./Dermis.	0	0	0	3
Oedema	0	0	1	2
Haemorrhage	0	0	2	2
Vascular Ectasia	0	0	1	0
Inflammatory Cell Aggregation	0	1	4	2
Kidneys				
Multifocal Nephrocalcinosis	0	0	3	6
Focal Nephrocalcinosis	1	1	0	0
Tubular Degeneration/Necrosis	0	0	1	6

In the 28-day immunotoxicity study in rats, tribenuron-methyl did not show any immunotoxic effect. Effects on bodyweight growth (decreased bodyweight and bodyweight gain) and reduced food consumption were noted at 600 ppm (44 mg/kg bw/day).

In the developmental toxicity study in the rabbit, the maternal toxicity consisted of mortalities (two females) noted at 80 mg/kg bw/day. One high dose female found dead on gestation day 17 had wide spread hepatisation of the lungs. The other high dose female was found dead on gestation day 29 after previously aborting a fetus and had more fetuses *in utero*. Both of these females had severely decreased food consumption prior to death. One middle dose female (20 mg/kg bw/day group) were also found dead. This animal had multiple mucosal haemorrhages in the stomach associated with a trichobezoar and died on gestation day 29 just prior to scheduled sacrifice. Since no effects were observed for the remaining animals of the mid-dose group this single death was not given further significance for the purpose of classification. Clinical signs (abortions) and body weight loss (-325 g) were also noted in dams at 80 mg/kg bw/day.

In the subchronic neurotoxicity study in the rat, treatment was associated with effects on bodyweight growth (reduced bodyweight and bodyweight gain) and reduced food efficiency noted in both sexes at 700 ppm. No treatment-related findings were noted during the FOB investigation. *The NOAEL in the study will be discussed at expert-meeting.*

In the long-term toxicity study in the rat, treatment was associated with effects on bodyweight growth (reduced bodyweight and bodyweight gain). The incidence of total malignant tumours in female rats was

significantly increased in the high-dose level (1250 ppm, corresponding to 76 mg/kg bw/day) after tribenuron-methyl administration. This was a result of the significant increase in mammary gland adenocarcinomas in the high-dose level. In males there were a statistical increase in total tumours already in the lowest dose group. However, there were no dose response and the study director concludes that this should be considered to be a statistical aberration and have no biological importance because there was no significant increase in any specific tumour type. There were also several systemic non-neoplastic effects in the male 250 (10 mg/kg bw/day) and 1250 ppm (55 mg/kg bw/day) dose group and in the female 1250 ppm dose (76 mg/kg bw/day) group when compared to controls (see table below). However, a specific target organ was not identified for non-neoplastic effects in male rats.

Dose	0 ppm	25 ppm	250 ppm	1250 ppm	
Number of rats/group:	62a	60	60b	61	
Males:					
Stomach: Mineralisation	3	2	8*	11*	
Aorta: Mineralisation	2	2	7*	9*	
Spleen: Lymphoid depletion	-	2	3	8*	
Pancreas: Polyarteritis increase	4	8	4	15*	
Seminal Vesicles: Reduced secretions	4	7	7	20*	
Liver: Fatty Change, Focal/Multifocal	17	14	12	8*	
Females:					
Kidneys:Bilateral dilatation of renal pelvis	2	4	5	8*	
Uterus: Dilatation	10	7	4	27*	
Eyes: Bilateral retinal degeneration	27	4	8	41*	
Liver:Fatty Change, Focal/Multifocal	29	28	21	6*	
^a Number of rats/group = 60 in females.					
^b Number of rats/group = 58 in females.					
* p $<$ 0.05 according to Fisher's Exact test					

Table 60: Incidences of non-neoplastic microscopic observations after two-year feeding with tribenuronmethyl in rats

Table 61: Extrapolation of equivalent effective dose for toxicity studies of greater or lesser duration than 90 days

Study reference	Effective dose (mg/kg/d)	Length of exposure	Extrapolated effective dose when extrapolated to 90- day exposure	Classification supported by the study
RAR Vol. 3, B.6.6.2.2/01	80 mg/kg bw/day	13 day	560 mg/kg bw/day	STOT RE Cat 2
Developmental toxicity study in rabbits				

10.12.1.2 Comparison with the CLP criteria

Regulation EC No 1272/2008 (CLP), Annex 1: 3.9.2.7.3, states for STOT RE:

"All available evidence, and relevance to human health, shall be taken into consideration in the classification process, including but not limited to the following toxic effects in humans and/or animals:

(a) morbidity or death resulting from repeated or long-term exposure. Morbidity or death may result from repeated exposure, even to relatively low doses/concentrations, due to bioaccumulation of the substance or its metabolites, and/or due to the overwhelming of the de-toxification process by repeated exposure to the substance or its metabolites;

(b) significant functional changes in the central or peripheral nervous systems or other organ systems, including signs of central nervous system depression and effects on special senses (e.g. sight, hearing and sense of smell):

(c) any consistent and significant adverse change in clinical biochemistry, haematology, or urinalysis parameters;

(d) significant organ damage noted at necropsy and/or subsequently seen or confirmed at microscopic examination;

(e) multi-focal or diffuse necrosis, fibrosis or granuloma formation in vital organs with regenerative capacity;

(f) morphological changes that are potentially reversible but provide clear evidence of marked organ dysfunction (e.g. severe fatty change in the liver);

(g) evidence of appreciable cell death (including degeneration and reduced cell number) in vital organs incapable of regeneration.

According to the CLP Guidance Table 3.9.3, a substance should be classified in Category 2 when significant toxic effects observed in a 90-day repeated-dose study conducted in experimental animals are seen to occur within the guidance value ranges as indicated in table below:

Route of Exposure	Units	Guidance Values Ranges: (dose/concentration)
Oral (rat)	mg/kg bw/day	10 <c≤100< td=""></c≤100<>
Dermal (rat or rabbit)	mg/kg bw/day	20 <c≤200< td=""></c≤200<>
Inhalation (rat) gas	ppm V/6h/day	50 <c≤250< td=""></c≤250<>
Inhalation (rat) vapour	mg/litre/6h/day	0.2 <c≤1.0< td=""></c≤1.0<>
Inhalation (rat) dust/mist/fume	mg/litre/6h/day	0.02 <c≤0.2< td=""></c≤0.2<>

Table 62: Guidance values for acute toxicity categories

According to Annex 1 3.9.2.9.8, the guidance values in table above is increased by a factor of three for a 28-day study.

Rat:

In the 28-day oral toxicity study in the rat (RAR Vol. 3, B.6.3.1.1/01), histopathological findings in the liver (hypertrophy of centrilobular hepatocytes) was noted at \geq 300 mg/kg bw/day. The severity of the observed effects was however not considered of concern for a classification as STOT-RE, also taken into consideration that no histopathological changes in the liver were noted in the 90-day feeding study at doses up to 5000 ppm (335 and 386 mg/kg bw/day in males and females, respectively).

In the 90-day oral toxicity study in the rat (RAR Vol. 3, B.6.3.2.1/01), effects on the liver (changes in biochemical parameters and liver weights) were noted at \geq 1750 ppm (118 and 135 mg/kg bw/day in males and females, respectively). In addition effects on blood parameters (increased platelet counts) were noted at \geq 1750 ppm. Furthermore, effects on the spleen (increased organ weights) were noted at 100 ppm (8 mg/kg bw/day). The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

In the 28-day immunotoxicity study in female rats (RAR Vol 3, B.6.8.2.2/01), effects on body weight growth and food consumption were noted at 300 ppm (44 mg/kg bw/day). The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

In the subchronic neurotoxicity study in the rat (RAR Vol 3, B.6.7.1.2/01), treatment was associated with effects on bodyweight growth (reduced bodyweight and bodyweight gain) and reduced food efficiency noted in both sexes at 700 ppm. No treatment-related findings were noted during the FOB investigation. The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

In the two-year rat study (RAR Vol. 3, B.6.5.1/01), treatment was associated with non-neoplastic changes in the male 250 (10 mg/kg bw/day) and 1250 ppm (55 mg/kg bw/day) dose groups and in the female 1250 ppm (76 mg/kg bw/day) dose group (mineralisation of stomach and aorta, spleen lymphoid depletion, increased pancreas polyarteritis, reduced secretion from seminal vesicles, liver fatty change, bilateral dilatation in renal pelvis, uterus dilatation and renal degeneration). However, a specific target organ was not identified for non-neoplastic effects in male rats. Thus, no changes of concern for classification were noted within the critical range of doses (i.e. $1.25 < C \le 12.5$ mg/kg bw/day) (Habers rule considered, exposure 8 times the concentration limits for 90 day study).

Mouse:

In the 28-day range finding study in mice (RAR Vol. 3, B.6.3.2.2/01), effects on the liver (changes in organ weights) were noted in both sexes at \geq 1250 ppm (250 mg/kg bw/day in males and females). The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

In the 90-day feeding study in mice (RAR Vol. 3, B.6.3.2.2/01), effects on the liver (changes in organ weights) were noted in both sexes at 2500 ppm (350 and 476 mg/kg bw/day in males and females, respectively). The severity of the observed effects was however not considered of concern for a classification as STOT-RE. Furthermore, no changes of concern for classification were noted within the critical range of doses (i.e. $10 < C \le 100$ mg/kg bw/day).

In the long-term toxicity study in the mouse (RAR Vol. 3, B.6.3.2.2/02) histopathology data revealed several minor modifications in the normal lesions of ageing within the male and female 1500 ppm (197 mg/kg bw/day) groups when compared to controls. These effects were not considered to be of adverse character and included a slight increase in severity of amyloidosis and marginal changes in some background inflammatory lesions, an increased incidence in thyroid inflammation in the 1500 ppm dose of both sexes, a higher incidence of bilateral testicular atrophy at the highest dose. A specific target organ was not identified. No changes of concern for classification were noted within the critical range of doses (i.e. $1.67 < C \le 16.7 mg/kg$ bw/day) (Habers rule considered, exposure 6 times the concentration limits for 90 day study)

Dog:

In the 90-day feeding study in dogs (RAR Vol. 3, B.6.3.2.3/01), effects on blood parameters (increased platelets (40%) at Month 3, increased leukocyte counts (30%) at Month 3, decreased mean corpuscular haemoglobin (2%, n.s.) at Month 2 were noted in males at 2500 ppm (78 mg/kg bw/day). The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

In the 1-year feeding study in dogs (RAR Vol. 3, B.6.3.3.1/01), effects on body weight growth and changes in biochemical parameters (increased serum creatinine concentrations) were noted in both sexes at 1500 ppm (52 mg/kg bw/day in males and females). The severity of the observed effects was however not considered of concern for a classification as STOT-RE.

Rabbit:

In the 28-day dermal toxicity study in rabbits (RAR Vol.3, B.6.3.3.1/01), histopathological changes in the kidneys (nephrocalcinosis, tubular degeneration/necrosis) were noted in both sexes at 1000 mg/kg bw/day. Furthermore, one male and one female were found dead (on day 29 and day 24, respectively) without clinical

signs preceding the death and no macroscopic abnormalities or microscopic findings were noted that could explain the death. The severity of the observed effect is considered relevant for a classification as STOT-RE. No NOAEL was determined in this limit dose study. It could however be noted that the LOAEL of 1000 mg/kg bw/day is close to the higher limit value for the critical range of doses (i.e. 28-day study: $60 < C \le 600$ mg/kg bw/day) for a classification as STOT-RE cat 2.

In the developmental toxicity study in the rabbit (RAR Vol. 3, B.6.6.2.2/01), mortalities (two animals) and body bw loss (-325 g) were noted in dams at 80 mg/kg bw/day. According to study author marked maternal toxicity occurred in the high dose group (80 mg/kg bw/day). Effects included an average maternal food consumption that was 48% lower than control over the gestation day 7-19 dosing period. After the initiation of dosing at this high dose, food consumption progressively decrased from approximately 22 to 66% lower than the control values. This reduced food consumption corresponded to a mean body weight loss of 325 g (compared to a body weight gain of 114 in controls) over the gestation day 7-19 dosing period. Exposure in this study was for 13 days (GDs 7-19) and mortality occurred on days 17 and 29. It is therefore considered an effect of repeated administration of the test substance rather than an acute effect. As exposure was for 13 days i.e. 1/7 of 90 days, it is proposed to multiply the Guidance Values of 10 for Cat 1 and 100 for Cat 2 classification of 10 and 100 mg/kg bw/day, respectively, by a factor 7, giving adjusted Guidance Values for 13 days of 70 and 700 mg/kg bw/day for STOT RE 1 and 2, respectively. The mortalities occurred above 70 mg/kg bw/day but below 700 mg/kg bw/day and therefore justify classification in STOT RE-2.

Two pilot teratogenicity studies were conducted to determine the maximum tolerated dose of the test substance by gavage in the rabbit. Based on data obtained from a pilot teratogenicity study, 6 females per group were given 0, 250, 500 or 750 mg/kg body weight in the first rabbit pilot study. These dose levels were found to be extremely toxic to the female rabbit and all females in the 500 and 750 mg/kg dose groups died. The dose level for the 250 mg/kg group was reduced to 125 mg/kg after 5 doses in an effort to determine the maximum tolerated dose. Although all six females in the low dose goup survived until scheduled sacrifice, no litters were produced. In the second rabbit pilot study, 7 females per group received the test substance at dose levels of 150 or 75 mg/kg body weight. The 150 mg/kg dose group demonstrated severe weight loss and two of the females died. No deaths were observed at 75 mg/kg body weight, but moderate weight loss and decreased feed consumption were evident. Based on these data, dose levels of 0, 10, 40 and 80 mg/kg body weight were chosen for the main study.

10.12.1.3 Conclusion on classification and labelling for STOT RE

Classification in **STOT RE 2**, H373 is proposed based on the mortalities seen in rabbits at 80 mg/kg bw/day in a developmental toxicity study with 13 days exposure to tribenuron-methyl. Furthermore mortalities and histopathological changes in the kidney (nephrocalcinosis, tubular degeneration/necrosis) were noted in the 28-day dermal toxicity study using a limit dose level of 1000 mg/kg bw/day.

10.13 Aspiration hazard

10.13.1.1 Short summary and overall relevance of the provided information on aspiration hazard

No data is available.

10.13.1.2 Comparison with the CLP criteria

No relevant as no data is available.

10.13.1.3 Conclusion on classification and labelling for aspiration hazard

No classification is proposed for tribenuron-methyl.

11 EVALUATION OF ENVIRONMENTAL HAZARDS

11.1 Rapid degradability of organic substances

Table 63: Summary of relevant information on rapid degradability

Method	Results	Remarks	Reference
OECD 301 E (1992)	11-24% degradation of the test substance in 28 days. The degradation of the reference compound was 100% in the same time span.	The test substance is not readily biodegradable	Douglas, M.T. & Halls, R.W.S. (1993) AMR 2422-92
OPPTS 835.2120 (2008), SETAC Europe (1995), OECD 111 (2004)	 First order half-lives: pH 4: 0.41 days at 10°C 0.19 days at 15°C 0.10 days at 20°C pH 7: 63.5 days at 15°C 31.0 days at 20°C 14.9 days at 25°C pH 9: 743 days at 15°C 266 days at 30°C 41.1 days at 40 °C pH 4: 0.04 days at 25°C 0.72 days at 25°C pH 7: 8.0 days at 25°C 0.72 days at 50°C pH 9: 157 days at 25°C 9.4 days at 50°C 1.6 days at 65°C Max formed metabolites (>5% of applied radioactivity): IN-00581: 92.8% at pH 7 (0.42 days, 20°C), 45.6% at pH 7 (30.0 days, 20°C), 9.3% (30.0 days, 25°C) IN-L5296: 90.5% at pH 4 (0.42 days, 20°C), 50.2% at pH 9 (30.0 days, 20°C), 9.7% at pH 9 (30.0 days, 25°C). IN-D5803: 6.9% at pH 7 (7.0 days, 20°C) 	Rapid hydrolysis under pH 4, moderate at pH 7 and nearly stable at pH 9	Liu, X. (2013) DuPont-36471 Hein, W. (2015) Report No: AS343 Report No. 315 TBM
OECD 316, OPPTS 835.2240	First order half-lives: Irradiated: 120 days Dark control: 315 days Net Photo-degradation: 195 days Max formed metabolites (>5% of applied radioactivity): IN-00581: 7.5% (15 days), IN-L5296: 5.62% (15 days)	Tribenuron-methyl was photolytically stable (i.e. net photodegradation DT ₅₀ is >190 days)	Wen, L. (2014) DuPont-36470

Method	Results	Remarks	Reference
OECD 309	12.1-18.2% mineralisation of	Study performed with pond water	Allan, J. (2014)
(2004), OPPTS	test substance in 60 days at	(pelagic conditions)	DuPont-36661
835.3190 (2008)	low dose (50 μ g/L)	(1	
000.0190 (2000)	7.7-28.2% mineralisation of		
	test substance in 60 days at		
	high dose (500 μ g/L)		
	lligh dose (500 µg/L)		
	91.6-93.0% mineralisation of		
	reference compound		
	([¹⁴ C]sodium benzoate) at		
	high dose in the same time		
	span.		
	First order half-life of test		
	substance: 86.2 days		
	Max formed metabolites (of		
	applied radioactivity):		
	IN-00581: 28.3% (46 days)		
	IN-L5296: 26.5% (46 days)		
OECD 309	Min 68% remaining as the	Study performed with river water	Moendel M (2015)
(2004)	test substance in 110 days at	(pelagic conditions and	Project No: AS344
	low dose (5 μ g/L) in water	suspended sediment test).	Report No. 328 TBM
	only test.	F	
	omy tost.	Too low mineralisation to	
	Min 60% remaining as the	accurately calculate half-lives. A	
	test substance in 110 days at	rough calculation using first	
	high dose (50 μ g/L) in water	order kinetics gives a half-life of	
	only test.	139 days for the suspended	
	only test.		
	Min 400/ normaining as the	sediment test system.	
	Min. 49% remaining as the		
	test substance in 110 days at		
	high dose (50 μ g/L) in		
	suspended sediment test.		
	Full degradation of the		
	positive control ([¹⁴ C]-		
	benzoic acid) in 48 hours.		
	Max formed metabolites		
	(>5% of applied		
	radioactivity):		
	IN-00581: 5.3% (14 days, 5		
	μ g/L water only), 5.0% (61		
	days, 50 µg/L water only),		
	20.4% (28 days, suspended		
	sediment test).		
	IN-L5296: 10.4% (61 days, 5		
	µg/L water only), 7.0% (110		
	days, 50 g/l water only), 8.3%		
	$(110 \text{ days}, 50 \mu\text{g/l water only})$		
	IN-A4098: 6.3% (110 days,		
	$50 \mu g/L$ water only)		
	IN-R9805: 8.9% (61 days, 5		
	μ g/L water only)		
	IN-GK521: 13.6% (110 days,		
	$50 \ \mu g/L$ water only), 14.8%		
	sediment test)		

Method	Results	Remarks	Reference
	IN-D5119: 10% (110 days, 50		
	µg/L water only test), 6.8%		
	(110 days, suspended		
	sediment test)		
	IN-D5803: 5.1% (28 days, 50		
	μ g/L water only test)		
SETAC Europe	Half-lives:	Study performed with two water	Pedersen, C.T.,
(1995), U.S. EPA		systems: Brandy wine river	Fetterman, D.E. (2001)
162-4 (1982)	Brandywine river:	(anaerobic conditions in the	DuPont-2286, Revision
	Total system: 26.2 days	sediment) and Lums pond	No. 1
	(SFO)	(aerobic conditions in sediment).	
	Water column: 22.5 days		Kinetic calculations in
	(SFO)	For Lums pond there was	Snyder et al (2012) and
	Sediment: 18.8 days (FOMC)	significant differences in the half-	Mamaouni & Callow
		lives for triazine and phenyl-	(2015b)
	Lums pond:	labbelled test substance. In the	
	Triazine label:	overall geomean of the half-life	
	Total system: 7.4 days (SFO)	for the water systems the	
	Water column: 6.5 days	geomean of Lums pond is first	
	(SFO)	calculated	
	Sediment: 5.3 days (SFO)		
	Phenyl label:		
	Total system: 21.5 days		
	(SFO)		
	Water column: 17.6 days		
	(FOMC)		
	Sediment: 19.1 days (SFO)		
	Overall geometric half-life in		
	total system: 18.2 days (SFO)		
	Max formed metabolites		
	(>5% of applied		
	radioactivity):		
	IN-L5296 (max 89% in total		
	system, max 42% in water,		
	max 86% in sediment)		
	IN-D5119 (max 26.5% in		
	total system, max 19% in		
	water, max 7.5% in sediment)		
	IN-00581 (max 38.4% in total		
	system, max 32% in water,		
	max 6.4% in sediment)		
	IN-R9805 (max 14.7% in		
	total system, max 9% in		
	water, max 5.7% in sediment)		
	IN-GN815 (max 13% in total		
	system, max 5.7% in water,		
	max 9.2% in sediment)		

All the information on rapid biodegradability are taken from the RAR and list of endpoints for tribenuronmethyl, June 2016. The tests that were available were mostly water/sediment studies and hydrolysis studies with tribenuron-methyl and its metabolites IN-L5296, IN-00581, IN-D5119, IN-GN815, and IN-R9805.

There was also a degradation test studying the aerobic mineralisation of tribenuron-methyl in surface water.

11.1.1 Ready biodegradability

Material and methods

A ready biodegradable test was performed with tribenuron-methyl according to OECD-guideline 301 E (modified OECD screening test) and GLP.

A mixture of test substance (tribenuron-methyl technical) and inorganic nutrient medium was added to activated sludge from a sewage treatment plant for domestic sewage at a rate of 0.5 ml/litre, and incubated for 28 days at 21°C. The test concentration used in the test was 32 mg/l (equivalent to 15 mg carbon/litre). The reference substance used was sodium benzoate (26 mg/l, equivalent to 15 mg carbon/litre). Duplicate test beakers were prepared for the test and standard substance, and for a blank test. An additional beaker was set up containing both test substance and reference substance in order to determine if tribenuron-methyl exhibits any bacterial-inhibiting properties.

Measurements of dissolved organic carbon (DOC) was conducted using a TC/TOC analyser, and percent biodegradation was determined by comparing residual DOC value with the DOC value measured at the start of the study.

Results

Degradation of the test substance in 28 days was 11-24 %. The reference compound was 100 % degraded. The inhibition check attained only 71 % biodegradation, indicating a slight inhibitory effect.

Summary

The test substance is not readily biodegradable in the sense of the test method (OECD 301). RMS comments was that the study was accepted in the DAR (2004) and is still deemed valid for the purpose of renewal.

11.1.2

11.1.3 BOD5/COD

No test provided according to OECD guidelines or other relevant guidelines.

11.1.4 Hydrolysis

Reference: Liu, X. (2013); Annex III

Guideline: OPPTS 835.2120 (2008), SETAC Europe (1995), OECD 111 (2004)

GLP: Yes

Test material: Label 1: [phenyl(U)-¹⁴C]tribenuron-methyl, Label 2: [triazine-2-¹⁴C]tribenuron-methyl

<u>Test system:</u> The tier 1 test at 50°C was not performed since the previous hydrolysis study showed that there was at least some hydrolysis at all three pH.

Hydrolysis of radiolabelled tribenuron-methyl at 1.02-1.16 mg/L (1 ppm) was studied in the dark at 10, 15, and 20°C (pH 4); 15, 20, and 25°C (pH 7); and 20, 30, and 40°C (pH 9). Hydrolysis was carried out in sterile aqueous buffered solutions at pH 4 (0.01 M potassium hydrogen phthalate), pH 7 (0.01 M potassium phosphate), and pH 9 (0.01 M potassium borate) for up to 30 days.

Results:

First order half-lives:

- pH 4: 0.41 days at 10°C 0.19 days at 15°C 0.10 days at 20°C
- pH 7: 63.5 days at 15°C 31.0 days at 20°C 14.9 days at 25°C
- pH 9: 743 days at 15°C 266 days at 30°C 41.1 days at 40 °C

Max formed metabolites (>5% of applied radioactivity; toxicological profile of metabolites described in the other parts of the report): IN-00581: 94.6% at pH 7 (0.42 days, 20°C), 45.6% at pH 7 (30.0 days, 20°C) IN-L5296: 90.5% at pH 4 (0.42 days, 20°C), 50.2% at pH 9 (30.0 days, 20°C)

IN-D5803: 6.9% at pH 7 (7.0 days, 20°C)

Reference: Hein, W. (2015); Annex III

Guideline: OECD 111 (2004)

GLP: Yes

Test material: Label 1: [phenyl(U)-14C]tribenuron-methyl, Label 2: [triazine-2-14C]tribenuron-methyl

<u>Test system:</u> A preliminary hydrolysis test was done at 50°C and pH 4, pH 7 and pH 9. The main test was then done at 25°C for pH 4 and 7 and at 25 °C, 50°C and 65°C at pH 9. The following buffers were used:

pH 4: citric acid buffer adjusted to pH 4 by addition of 0.1 N NaOH

pH 7: potassium dihydrogen phosphate adjusted to pH 7 by addition of 0.1 N NaOH

pH 9: potassium borate adjusted to pH 9 by addition of 0.1 N NaOH

Results:

First order half-lives: pH 4: 0.04 days at 25°C

- pH 7: 8.02 days at 25°C 0.72 days at 50°C 14.9 days at 25°C
- pH 9: 157 days at 25°C 9.37 days at 50°C 1.6 days at 65 °C

Max formed metabolites (>5% of applied radioactivity; toxicological profile of metabolites described in the other parts of the report):

IN-00581: 92.8% at pH 4 (0.10 days, 25°C), 82.4% at pH 7 (21 days, 25°C), 9.3% at pH 9 (30 days, 25°C) IN-L5296: 88.0% at pH 4 (0.10 days, 25°C), 78.8% at pH 7 (21 days, 25°C), 9.7% at pH 9 (30 days, 25°C) IN-D5803: 6.9% at pH 7 (7.0 days, 20°C)

11.1.5 Other convincing scientific evidence

No information.

11.1.5.1 Field investigations and monitoring data (if relevant for C&L)

Not relevant

11.1.5.2 Inherent and enhanced ready biodegradability tests

No information

11.1.5.3 Water, water-sediment and soil degradation data (including simulation studies)

The available data on tribenuron-methyl and its metabolites on degradation in surface water and watersediment studies are summarised in the tables below. Individual studies are further summarized in the List of Endpoints, RAR tribenuron-methyl, June 2016.

Aerobic mineralisation in surface water (Regulation (EU) N° 283/2013, Annex Part A, point 7.2.2.2 and Regulation (EU) N° 284/2013, Annex Part A, point 9.2.1)

Parent											
System identifier (indicate fresh,	1	pH sed ^{a)}	t. °C ^{b)}		whole sys. ediment test)		DT ₅₀ /D7 Water (p	Г90 elagic test)	St. (χ2)	Method calculation	of
estuarine or marine)	phase			At study temp	Normalised to x °C		At study	Normalised to x °C			
pond water	8.0		20				temp 86.2 ^{c)}		3	SFO	
river water	8.3		20- 24	139	-	2	_e)	-	-	SFO	

a) Measured in [medium to be stated, usually calcium chloride solution or water].

b) Temperature of incubation.

c) Based on degradation of parent into transformation products (not full mineralisation).

d) pH of sediment not reported.

e) Due to long lag phase and too few data points no degradation half-life could be calculated.

Mineralisation and no	on extractab	le residue	es (for parent dosed experim	ients)	
System identifier	pH water	pH sed	Mineralisation	Non-extractable residues.	Non-extractable residues. max
(indicate fresh,	phase	-	x % after n d. (end of the	max x % after n d	x % after n d (end of the study)
estuarine or marine)	-		study).	(suspended sediment test)	(suspended sediment test)
Pond water	8.0	-	28% after 60 d		
river water	8.3	-	2.2% after 110 days	2.7% after 14 days	1.6% after 110 days
			(pelagic)		
			3.8% after 110 days		
			(susp. sed.)		

Parent										
System identifier (indicate fresh, estuarine or marine)	pH water phase	pH sed ^{a)}	t. °C ^{b)}	DT ₅₀ /DT ₉₀ v (suspended s At study temp	whole sys. sediment test) Normalised to x °C	St. (χ2)	DT ₅₀ /D' Water (p At study temp	Γ ₉₀ elagic test) Normalised to x °C	St. (χ2)	Method of calculation
pond water	8.0	-	20	-	-	-	86.2 ^{c)}	-	3	SFO
river water	8.3	_ ^{d)}	20- 24	139	-	2	_ ^{e)}	-	-	SFO

a) Measured in [medium to be stated, usually calcium chloride solution or water].

- b) Temperature of incubation.
- c) Based on degradation of parent into transformation products (not full mineralisation).
- d) pH of sediment not reported.
- e) Due to long lag phase and too few data points no degradation half-life could be calculated.

Summary

Tribenuron-methyl and its metabolites are slowly mineralized with a DT50 for the whole system 139 days in river water (suspended sediment test) and DT50 in pond water 86.2 days based on degradation of parent into transformation products in water (pelagic test).

Water / sediment study (Regulation (EU) N° 283/2013, Annex Part A, point 7.2.2.3 and Regulation (EU) N° 284/2013, Annex Part A, point 9.2.2)

Parent	Distribu	tion; mai	nly dist	ributed to water	r phase					
Water / sediment system	pH water phase	pH sed ^{a)}	t. °C	DT ₅₀ /DT ₉₀ whole sys.	St. (χ2)	DT ₅₀ /DT ₉₀ water	St. (χ2)	DT ₅₀ /DT ₉₀ sed	St. (χ2)	Method of calculation
Brandywine river	6.8-8.3	6.5- 7.5	20	26.7/ 88.6	7- 11 ^{b)}	23.3/ 77.3	6-8 ^{b)}	18.8/87.6 ^{c)}	4	SFO
Lums pond	4.9-7.7	4.9- 5.4	20	12.9/ 42.8	7- 21 ^{b)}	11.4/ 40.9	8- 20 ^{b)}	10.1/33.6	31- 35 ^{b)}	SFO
Geometric mean at 2	20°C ^{b)}			18.5		-		-		-

a) Measured in water.

b) Range of χ 2-error from the fittings in two kinetic studies and/or from the fitting of data derived with two different radiolabels.

c) Dissipation from sediment in Brandywine river; FOMC kinetic model.

Mineralisation and non extractable residues (from parent dosed experiments)

Water / sediment	pH water	pН	Mineralisation	Non-extractable residues	Non-extractable residues in sed.
system	phase	sed ^{a)}	x % after n d. (end of	in sed. max x % after n d	max x % after n d (end of the
			the study).		study)
Brandywine river	6.8-8.3	6.5-7.5	60% (135 d, phenyl(U)-	26% after 105 d	22% after 135 d (phenyl(U)- 14 C)
			¹⁴ C)	$(phenyl(U)-{}^{14}C)$	14% after 135 d (triazine-2-14C)
			18% (135 d, triazine-2- ¹⁴ C)	16% after 71 d (triazine-2- ¹⁴ C)	
. .	40.55	4054		1.00 0 105 1	150(0 105 1 (1 1/17) 1/0)
Lums pond	4.9-7.7	4.9-5.4	65% (135 d, phenyl(U)-	16% after 105 d	15% after 135 d (phenyl(U)- 14 C)
			¹⁴ C)	$(\text{phenyl}(\text{U})^{-14}\text{C})$	
			1.4% (105 d, triazine-2-	9.3% after 105 d (triazine-	
			¹⁴ C)	2- ¹⁴ C)	

a) Measured in water.

IN-L5296	Distribu	Distribution; up to 88.9% (total system, 56 d), max 42% in water (14 d), max 86% in sediment (56 d)										
Water / sediment	pН	pH	t. °C	DT ₅₀ /DT ₉₀	St.	DT ₅₀ /DT ₉₀	St.	DT ₅₀ /DT ₉₀	St.	Method of		
system	water	sed a)		whole sys.	(<u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u>	water	$(\chi 2)$	sed	$(\chi 2)$	calculation		
	phase											
Brandywine river	6.8-8.3	6.5-	20	168/558	10	not avail.	-	not avail.	-	SFO-SFO		
		7.5										
Lums pond	4.9-7.7	4.9-	20	309/1026	10	3.2/	7	not avail.		SFO-SFO		
_		5.4				33.6 ^{c)}						
Geometric mean at	20°C ^{b)}			227.8		-		-		-		

a) Measured in water.

b) Normalised using a Q10 of 2.58.

c) Dissipation from water column in Lums pond; FOMC kinetic model.

IN-00581	Distribu	Distribution; up to 38.4% (total system, 14 d), max 32% in water (14 d), max 6.4% in sediment (14 d									
Water / sediment	pН	pН	t. °C	DT50 /DT90	St.	DT50 /DT90	St.	DT50 /DT90	St.	Method of	
system	water	sed a)		whole sys.	(<u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u>	water	(χ2)	sed	(χ2)	calculation	
	phase										
Brandywine river	6.8-8.3	6.5-	20	not avail.	-	not avail.	-	not avail.	-		
		7.5									
Lums pond	4.9-7.7	4.9-	20	5/35.8 ^{c)}	10	2.3/20.5 ^c)	7	not avail.	-	FOMC	
-		5.4									
Geometric mean at			10.8 ^{d)}		-		-		-		

a) Measured in water.

b) Normalised using a Q10 of 2.58.

c) Decline fit; FOMC kinetic model.

d) Modelling input - FOMC DT_{90} / 3.32.

IN-D5119	Distribu	tion; up 1	to 26.59	6 (total system,	56 d), n	nax 19% in wat	ter (56 c	l), max 7.5% in	sedime	ent (56 d)
Water / sediment system	pH water phase	pH sed ^{a)}	t. °C	DT ₅₀ /DT ₉₀ whole sys.	St. (χ2)	DT ₅₀ /DT ₉₀ water	St. (χ2)	DT ₅₀ /DT ₉₀ sed	St. (χ2)	Method of calculation
Brandywine river	6.8-8.3	6.5- 7.5	20	not avail.	-	not avail.	-	23.3/77.5 ^c)	18	SFO
Lums pond	4.9-7.7	4.9- 5.4	20	not avail.	-	not avail.	-	not avail.	-	-
Geometric mean at	not avail.		-		-		-			

a) Measured in water.

b) Normalised using a Q10 of 2.58.

c) Dissipation from sediment in Brandywine river.

IN-GN815	Distribu	Distribution; up to 13% (total system, 29 d), max 5.7% in water (42 d), max 9.2% in sediment (29 d)									
Water / sediment	pН	pH	t. °C	DT50 /DT90	St.	DT50 /DT90	St.	DT50 /DT90	St.	Method of	
system	water phase	sed a)		whole sys.	(χ2)	water	(χ2)	sed	(χ2)	calculation	
Brandywine river	6.8-8.3	6.5-	20	47.6/158 ^{c)}	10	32.1/107 ^{c)}	7	28.5/94.6 ^{c)}	17	SFO	
Drandy while river	0.0-0.5	7.5	20	47.0/130	10	52.1/107	'	20.5/94.0	17	510	
Lums pond	4.9-7.7	4.9- 5.4	20	not avail.	-	not avail.	-	not avail.	-	-	
Geometric mean at	47.6		-		-		-				

a) Measured in water.

b) Normalised using a Q10 of 2.58.

c) Decline fit; SFO kinetic model.

IN-R9805	Distribut	Distribution; up to 14.7% (total system, 71 d), max 9% in water (71 d), max 5.7% in sediment (71 d)								
Water / sediment	pН	pН	t. °C	DT50 /DT90	St.	DT50 /DT90	St.	DT50 /DT90	St.	Method of
system	water	sed a)		whole sys.	(<u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u>	water	(<u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u> <u></u> (<u></u> <u></u> <u></u> <u></u> <u></u> <u></u>	sed	(<u>x</u> 2)	calculation
	phase									
Brandywine river	6.8-8.3	6.5-	20	not avail.	-	not avail.	-	not avail.	-	-
		7.5								
Lums pond	4.9-7.7	4.9-	20	not avail.	-	not avail.	-	not avail.	-	-
		5.4								
Geometric mean at 2	Geometric mean at 20°C ^{b)}			not avail.		-		-		-

a) Measured in water.

b) Normalised using a Q10 of 2.58.

Summary

Tribenuron-methyl and its metabolites IN-L5296 are not rapidly degradable in the water sediment study. For Tribenuron-methyl with a DT50 geometric mean at 20° C of 18.5 days were calculated and for the metabolite IN-L5296 of 227.8 days, IN-00581 of 10.8 days and IN-GN815 of 47.6 days. The metabolites IN-D5519 and IN-R9805 were not available.

Summary of the degradation tests

Tribenuron-methyl and its metabolites are not rapidly degradable.

11.1.5.4 Photochemical degradation

Reference: Wen, L. (2014); Annex III

Guideline: OECD 316, OPPTS 835.2240

GLP: Yes

Test material: Label 1: [phenyl(U)-¹⁴C]tribenuron-methyl, Label 2: [triazine-2-¹⁴C]tribenuron-methyl

<u>Test system:</u> The rate and route of photochemical degradation of $[^{14}C]$ tribenuron-methyl was determined in sterile 0.01 M pH 9 borate buffer solution. The test was conducted at concentrations of 1.13 mg/L for both the phenyl nd triazine-label under continuous irradiation using a xenon arc lamp for approximately 15 days at ca $25 \pm 2^{\circ}C$. This was equivalent to *ca* 30 days of mid-summer sunlight (at latitude of 40° N), assuming a 12 h

light/ 12 h dark cycle. The radiolabelled material was applied to autoclaved 0.01 M, pH 9 borate buffer prepared in HPLC-grade water in individual quartz glass photolysis vessels.

The test was only performed at pH 9 in order to minimise the hydrolysis as prescribed by OECD 316. All irradiated samples were exposed to artificial sunlight of a xenon arc lamp fitted with a filter designed to mimic natural sunlight (nominal UV cut-off of 295 nm). Non-irradiated (dark control) samples were also prepared for each radiolabel and test system and maintained in the dark at ca $25 \pm 2^{\circ}$ C.

Results:

	First-order rate constant	DT50 ¹	DT75 ¹	
Treatment	(day-1)	(days)	(days)	r ²
Irradiated	0.005758	120	241	0.9554
Dark Control	0.002203	315	629	0.7489
Net Photo-degradation	0.003555	195	390	NA

Max formed metabolites (>5% of applied radioactivity):

IN-00581: 7.5% (15 days), IN-L5296: 5.62% (15 days)

Summary of the photolytical degradation

Not an important route for tribenuron-methyl.

11.2 Environmental transformation of metals or inorganic metals compounds

Not applicable

11.3 Environmental fate and other relevant information

No further relevant information

11.4 Bioaccumulation

Since tribenuron-methyl has a Log Kow < 4 (actual value is -0.46 to 2.0 in the pH range of 4 to 10) the potential for bioaccumulation is low.

Method	Results	Remarks	Reference
OECD 117 / shake	All results are given at 20°C.	Key study	Pakki,
flask method and	distilled water:		U.V.S., 2013
HPLC analysis	$Log Kow = 0.85 \pm 0.03$		DuPont-
	acidic pH not measured due to rapid hydrolysis		36463
	pH 7.0 phosphate buffer:		
	$\log Kow = -0.38 \pm 0.01$		
	pH 9.0 borate buffer:		
	$\log Kow = -0.93 \pm 0.01$		
OECD 117 / shake	All results are given at 20°C.	Key study	Cowlyn, N.,
flask method and	pH 4 orthophosphate buffer:	It should be noted that tribenuron-	2014
HPLC analysis	Log Kow = 2.0	methyl undergo hydrolysis at acidic	(288 TBM)
-	pH 7.0 orthophosphate buffer:	pH, and the result at pH 4 i.e.	
	Log Kow = -0.46	$\log Kow = 2.0$ is most likely	
	pH 10.0 borate buffer:	somewhat underestimated.	
	Log Kow = -2.22		

11.4.1 Estimated bioaccumulation

Since tribenuron-methyl has a Log Kow < 4 (actual value is -0.46 to 2.0 in the pH range of 4 to 10) the potential for bioaccumulation is low.

11.4.2 Measured partition coefficient and bioaccumulation test data

No data available

11.5 Acute aquatic hazard

Table 65: Summary of relevant information on acute aquatic toxicity

Method	Species	Test material	Results [mg/L]	Remarks	Reference
OECD 203 96h (static)	<i>Oncorhynchus mykiss</i> Rainbow trout	Tribenuron- methyl	Mortality, $LC_{50} = 738$ (mean measured)	Key study	DUP, Boeri, R.L., Kowalski, P.L., Ward, T.J., 1997, AMR 4201-96
OECD 202 48h (static)	Daphnia magna Water flea	Tribenuron- methyl	Immobility, EC ₅₀ > 894 (mean measured)	Key study	DUP, Boeri, R.L., Kowalski, P.L., Ward, T.J., 1997 AMR 4202-96
OECD 201 72h (static)	<i>Pseudokirchneriella</i> <i>subcapitata</i> Green algae	Tribenuron- methyl	Growth rate, $ErC_{50} = 0.068$ (nominal)	Key study	DUP, Sloman, T.L., Leva, S.E., 1998, DuPont-1222
OECD 201 72h (static)	Anabena flos-aquae Cyanobacteria	Tribenuron- methyl	Growth rate, ErC ₅₀ >100 (nominal)		TTF: Hermes, H., Sonntag, F. (2016) Ibacon Project 118631218
US EPA guideline 123- 2 14d (static)	<i>Lemna gibba</i> Duck weed	Tribenuron- methyl	Growth rate, ErC _{50 =} 0.0047 (nominal)	Key study	DUP, Kannuck, R.M., Samel, A., 2000, AMR 3070-94, Revision No. 1 Scown, T., et al 2014 DuPont-41634
14d (static)	Myriophyllum spicatum	Tribenuron- methyl	Growth rate, ErC ₅₀ >94		DUP, Kirkwood, A., 2015 DuPont-32239, Revision No. 2
OECD 239 14d (static)	Myriophyllum spicatum	Tribenuron- methyl	Growth rate (fresh weight), $ErC_{50} = 0.0065$ (nominal)		TTF, Gonsior , G., 2015, 297 TBM amdt-1

11.5.1 Acute (short-term) toxicity to fish

Tribenuron-methyl shows a low acute toxicity to fish with an LC_{50} of **738 mg/L**.

Reference:	DUP: Boeri et al., 1997a DPX-L5300: Acute toxicity to the rainbow trout, Oncorhynchus mykiss
Company	
Report No.:	AMR 4201-96
Guideline:	EEC Method C.1. (1992), OECD 203 (1992), U.S. EPA 71-2 (1988)
GLP:	Yes
Material and 1	methods:
Test material:	Tribenuron methyl technical
Lot/Batch #:	L5300-152, L5300-153
Purity:	99.7% (L5300-152)
	98.9% (L5300-153)

	The acute toxicity of tribenuron-methyl to rainbow trout (<i>Oncorhynchus mykiss</i>) was tested in a static test system. Twenty fish per test concentration (two replicates of 10 fish each) were exposed
Test system/	for 96 hours to the following nominal test concentrations: 130, 220, 360, 600, and 1000 mg/l, along
test	with a water control. The mean weight of the test fish was 1.2 g and the mean length was 51 mm.
conditions:	The water temperature during the test was 12 - 13°C, the pH was 7.2-7.6 and the oxygen content was
	7.0-9.5 mg/l. Hardness and alkalinity of the dilution water was 44-48 mg/l and 29-31 mg/l,
	respectively.

Results:

Mean measured concentrations were 83-88 % of nominal concentrations. The 96-hour LC_{50} -value was calculated to be 738 mg/l. Changes in coloration were observed in several of the test organisms at test concentration 302 mg/l at 48, 72 and 96 hours. Changes in coloration, lethargy and/or distended abdomen were observed in several organisms at test concentrations 522 and 878 mg/l at 24, 48, 72 and 96 hours, and the 96 hour NOEC was therefore set to 183 mg/l. All values are based on mean measured concentrations.

There were no mortality or sublethal effects observed in the control for the duration of the study.

11.5.2 Acute (short-term) toxicity to aquatic invertebrates

Tribenuron-methyl shows a low acute toxicity to aquatic invertebrates with a LC₅₀ of >894 mg/L.

Reference:	DUP: Boeri et al 1997b Acute toxicity to the daphnid, Daphnia magna		
Company	AMR 4202-96		
Report No.:	AWIK +202-70		
Guideline:	OECD 202 (1992)		
GLP:	Yes		
Material and methods:			
Test material:	Tribenuron-methyl		
Lot/Batch No:	DPX-L5300-152		
Purity:	98.9% (w/w)		
Test system/test conditions:	A 48-hour static test with tribenuron-methyl was conducted with <i>Daphnia magna</i> at the following nominal test concentrations: 130, 220, 360, 600, and 1000 mg/l, along with a dilution water control. The study was conducted with twenty daphnids (two replicates of ten daphnids each) per test concentration. The water temperature during the test was 20 - 21°C, the pH was 7.5-8.0, and the oxygen content was 7.1-8.6 mg/l. Hardness and alkalinity of the dilution water were 172 mg/l and 116 mg/l, respectively. The pH of the dilution water was adjusted with phosporic acid.		

Results:

Mean measured concentrations during the test were 89-92 % of nominal concentrations. One out of 20 daphnids was immobilised in the control, in the 120 and the 537 mg/l test concentrations, respectively. No sublethal effects were observed. The 24- and 48-hour EC₅₀ was >894 mg/l. NOEC was set to 894 mg/l. The values are based on measured concentrations. The validity criteria of OECD 202 (2004) are fulfilled.

11.5.3 Acute (short-term) toxicity to algae or other aquatic plants

Both algae and aquatic plants are sensitive to tribenuron-methyl, which is expected for a herbicide. Higher plants are more sensitive than algae. The lowest EC_{50} is **0.0047 mg/L** derived with *Lemna gibba*.

Reference:	DUP: Sloman 1998b Tribenuron-methyl technical (DPX-L5300): Influence on growth and growth rate of the green alga <i>Selenastrum capricornutum</i>			
Company				
Report No.:	DuPont 1222			
Guideline:	OECD Guideline 201, EU Commission Directive 92/69/EEC, Method C3			
GLP:	Yes			
Material and n	Material and methods:			
Test material:	Tribenuron-methyl			
Lot/Batch No:	DPX-L5300-143			
Purity:	97.4% (w/w)			
Test system/test conditions:	The influence of technical tribenuron-methyl on growth rate of <i>Selenastrum capricornutum</i> was tested in a static system at measured concentrations (at the end of the study) of 4.0, 8.0, 16, 23 and 32 μ g/l in synthetic AAP nutrient medium, along with control cultures. The test vessels (triplicate) were incubated for 120 hours at 24°C under continuous illumination. The pH was in the range 7.0-8.0. The algal cell densities were determined using a hemacytometer and a compound microscope.			

Results:

The measured concentrations at day 5 were 96-100 % of nominal concentrations.

72h NOEC = 4 μ g/L 72h EC₁₀ = 11.48 μ g/L 95% C.I. (7.02-18.75) 72h EC₂₀ = 21.19 μ g/L 95% C.I. (16.27-27.60)

72h EC₅₀ = 68.50 μ g/L 95% C.I. (45.02-104.2)

The following comments were made in the DAR 2004: The number of cells (3000) at test initiation was lower than what is recommended in the OECD guideline (10 000), but this will not influence the results of the test. Cell counts were not done at day 2. The duration of the study was longer than the guideline requirements. However, since exponential growth was observed throughout the test, the 120 hour data is still valid.

For the present report, the RMS re-evaluated the study in line with OECD 201 (2006) and concluded that validity criteria are met.

Defeneres	TTF: Hermes, H., Sonntag, F. (2016); Tribenuron-methyl Technical: Toxicity to Anabena		
Reference:	flos-aquae in an Algal Growth Inhibition Test		
Company Report			
No.:	Ibacon Project 118631218		
Guideline:	OECD 201 (2011).		
GLP:	Yes		
Material and meth	Material and methods:		

Test material: Tribenuron-methyl Technical

Lot/Batch #: Purity: Control: Test vehicle: Toxic reference: Test species: Initial population:	Batch No.: 63B3011159 98.3% by analysis Reconstituted Water (20x AAP Medium) None None Anabena flos-aquae UTEX 1444 15,000 cells/mL The University of Texas at Austin, UTEX Culture Collection of Algae, 1 University Station",
Source:	Austin, TX 78712, USA.
Test chamber: Experimental treatments	 Erlenmeyer flasks of 50 mL volume with 50 mL of test medium. 72h static 100, 32, 10, 3.2, 1.0, 0.32 and 0.10 mg test item/L, and a control 3 replicates.
Growth medium:	Reconstituted Water (20x AAP Medium)
pH Environmental conditions (in-life period)	at test start 7.6, at the end of the test 8.6 to 9.4
Temperature:	22 to 24 °C
Photoperiod:	Continuous illumination; mean light intensity: 4203 lux (4000 to 4400 lux). The cell density on each observation time was determined by spectrophotometric measurement (spectral photometer Specord50/Specord 50 Plus, 440 nm). Therefore, defined volumes of the algal suspensions from all replicates and from the blanks were sampled after 24, 48 and 72 hours of exposure, and were not replaced. The algal cell densities were calculated by subtracting the absorption of the blanks, from each of the measured absorption of the test media (with algae).
Observations	 Based on the counted cell densities and the absorption from an algal suspension and its dilutions, a linear regression was performed for the calculation of the cell densities of the replicates during the test. To check for any effect of the test item on the morphology of the algal cells, at least one sample from each test item concentration with a reduced cell density was taken after the test period of 72 hours. The shape of the treated algal cells compared to the control was examined microscopically
Statistics	 Based on the calculated cell densities, the 72 hours ErC50 and the 72 hours EyC50 (see Definitions), the corresponding EC20 and EC10 values and where possible their 95 %-confidence limits were calculated by Probit analysis. For the determination of the 72 hours LOEC and the 72 hours NOEC, the calculated growth rates and yields at each test concentration were tested for significant differences compared to the control values by Williams t-test. The software used to perform the statistical analysis was ToxRat Professional, Version 3.2.1, ToxRat□ Solutions GmbH.

Analytical Results:

At the start of the test 97% of the nominal test concentrations were found (average of all test concentrations). After 72 hours test duration, 97% of the nominal value was determined (average of all test concentrations). During the test the algae were exposed to a mean of 97% of nominal. Therefore, all reported results refer to nominal concentrations.

Conclusion:

The 72-hour EyC50 was calculated to be 62.5 mg test item/L, and the 72-hour ErC50 value was calculated to be > 100 mg test item/L. The 72-hour NOEyC was determined to be 10 mg test item/L and the associated 72-hour LOEyC was 32 mg test item/L.

The validity criteria stipulated in OECD guideline 201 (2011) are fulfilled.

Reference: DUP: Kannuck 2000, Tribenuron-methyl (DPX-L5300): Influence on growth and reproduction of *Lemna gibba* G3

	DUP: Scown 2014 Tribenuron-methyl : Calculation of Lemna 7-day EC ₅₀ values from original exposure study data
Company	AMR 3070-94, Revision No. 1
Report No.:	DuPont-41634
Guideline:	US EPA guideline 123-2
GLP:	Yes
Material and n	nethods:
Test material:	Tribenuron-methyl
Lot/Batch No:	DPX-L5300-104
Purity:	92.6% (w/w)
Test system/test conditions:	The influence of tribenuron-methyl on growth and reproduction of <i>Lemna gibba</i> was tested in a static system at measured (day 0) test concentrations of 0.49, 1.02, 2.54, 4.69 and 11.4 μ g/l in synthetic 20X AAP nutrient medium, along with a blank control and an abiotic control. The test vessels (triplicate) were incubated for 14 days at 24.0-26.5 °C under continuous illumination. The pH ranged from 7.5 to 9.5

(1. 1.) Cale C T EC 1.4

Results: Concentrations measured at day 14 ranged between 94 and 102% of the values measured at day 0. The 14 day EC_{50} for frond number was 4.3 µg/l, and NOEC was 1.0 µg/l. The 14 day EC_{50} for biomass was 5.6 µg/l and the NOEC was 1.0 µg/l, based on measured concentrations (day 0). Recovery was tested for the organisms in the concentrations that resulted in 50 % or greater inhibition. Full recovery was observed in the 4.7 and 2.5 µg/l concentrations, but plants exposed to 11 µg/l did not recover after 14 days in fresh, untreated media.

The Scown 2014 paper provides the calculation of 7-day EC_{50} and NOEC values from the raw data available from the exposure study on the active substance with Lemna gibba. The 7-day EC₅₀ and NOEC values from the raw data available from the exposure study on the active substance with Lemna gibba were calculated for use in environmental risk assessments for aquatic macrophytes. The EC_{50} and NOEC based on 0-7 day growth rate were 4.73 µg a.s./L and 1.02 µg a.s./L, respectively.

The study is relevant and acceptable. The RMS found the study to be valid based on criteria of OECD 221 (2006) and agrees with the conclusions made by the applicant.

The following comments were made in the DAR 2004: The nutrient medium was not renewed during the test, however, judged from the analyses it seems that the test concentration remained within acceptable levels throughout the study. The light intensity was lower than the guideline recommendations, but the validity criterion of maximum doubling time was met with regard to the exposure during 0-7 days, for which the NOEC and EC₅₀ values were derived.

Reference:	DUP: Kirkwood 2015 Tribenuron-methyl (DPX-L5300) technical - growth inhibition of the aquatic macrophyte <i>Myriophyllum spicatum</i>
Company Report	
No.:	DuPont-32239, Revision No. 2
Guideline:	None
GLP:	Yes
Material and met	hods:
Test material:	Tribenuron-methyl technical
Lot/Batch #:	L5300-271
Purity:	99.3%

Test carrier:	Well water fortified for hardness
Toxic reference:	None
Test organism:	Aquatic macrophyte
Species:	Myriophyllum spicatum
Initial population:	3 plants per replicate
Source:	Bayer Crop Science
Growth medium:	Well water fortified for hardness
Test chamber:	4-liter beakers with 3 cm sediment
	Five replicates with 3 plants per replicate were initiated for each test substance concentration and the dilution water (freshwater reconstituted for hardness) control. Each 4-liter test chamber (replicate) contained one pot with 3 cm of sediment, planted with 3 plants with shoot lengths of approximately 7 cm each.
Treatments:	Nominal exposure concentrations of tribenuron-methyl were 0.0010, 0.010, 0.10, 1.0, 10, and 100 mg a.s./L.
	A single test vessel containing no M. spicatum or sediment was initiated at the highest test concentration for the abiotic control.
Exposure:	14d static
Environmental conditions (in-life	
period): Temperature:	22 + 2000
Photoperiod:	23 to 26°C 16-hour light/8 hour dark (4400 to 7300 lux; PAR: 50-93 μE * m ⁻² * s ⁻¹)
pH:	7.9 to 10 throughout the exposure period
p11.	Individual shoots from each replicate were cut at the sediment surface and placed into a pre-
Observations	weighed aluminium pan. Shoots were then dried in an oven at approximately 70°C for a minimum of three days and individual shoot dry weights were determined using an analytical balance.
Statistics	The EC_{50} value is defined as the concentration of test substance which caused a 50%
	reduction in mean shoot dry weight compared to the control data, determined by linear
	interpolation of response using the statistical program CETIS (Ives, 2011). If <50% response
	was observed in the highest concentration tested, the EC_{50} was empirically estimated to be
	greater than the highest concentration tested

Results:

Measured concentrations 90-97% of nominal, with exemption of lowest tested concentration where measured was 220% of nominal.

At test termination, no plant mortality was observed in the control or any of treatment levels. Approximately twenty five percent of plant biomass was observed to be necrotic in 3, 6, and 9 plants in the 0.090, 8.9, and 94 mg a.s./L treatment levels, respectively. Approximately fifty percent of plant biomass was observed to be necrotic in 1, 3, and 3 plants at the 0.87, 8.9, and 94 mg a.s./L treatment levels, respectively. Approximately seventy-five percent of plant biomass was observed to be necrotic in 1 plant in the 94 mg a.s./L treatment level. Apical bud damage was observed among all 15 plants exposed to the 0.0022, 0.0097, 0.090, 0.87, 8.9, and 94 mg/L treatment levels and control. Apical bud damage refers to any effect observed on the apical bud portion of a plant. Apical bud damage was observed at 7 and 14 days exposure.

The 14 day EC_{50} value for dry shoot weight was empirically estimated to be >94 mg a.s./L, the highest concentration tested.

On request by the RMS, the applicant provided the following additional information. The statistical methods used are described in the beginning of chapter 9.2.7.

The NOEC for growth rate was statistically calculated = 94 mg/L. No useful model could be fit to the data to allow calculation of ECx endpoints for growth rate.

NOEC necrosis = 0.87 mg/L NOEC growth rate = 94 mg/L $ErC_{10} = 3.5111$ mg/L 95% C.I. (1.547-6.662) $ErC_{20} = 9.6558$ mg/L 95% C.I. (4.318-18.452) $ErC_{50} > 94$ mg/L

If apical bud damage is considered an adverse effect, then the NOEC is <0.0022 mg/L.

This study was conducted before OECD 239 (2014) was in place. The RMS evaluated the validity of this study using the criteria set in line with OECD 239: Slight deviations are found in the used test medium (EPA hard water versus Smart Bako medium), irradiation (50-93 versus 140 (\pm 20) μ E * m⁻² * s⁻¹) and temperature (23-26°C versus 20°C). However, since the doubling time and coefficient of variance are within the validity limits set in the guidance, the study is valid.

Reference:	TTF: Gonsior, G. 2015. Tribenuron-Methyl: Growth Inhibition of <i>Myriophyllum sp</i> in a Water/Sediment System.		enuron-Methyl: Growth Inhibition of Myriophyllum spicatum
		Report No. 297 TBM amdt-1	
Company Repor	t No.:	Project no.: S14-00454	
Guideline:		OECD 239 (2014)	
GLP:		Yes	
Material and m Test material:		on-methyl	
	Batch:	63B3011159	
	Purity:	98.23 % w/w (ana	lysed)
	Descrip	ion: Solid, light brown	
Test organism:	Myriop	yllum spicatum	
Source:	Origina	ly cultured by the Landesanstal	t für Gewässerkunde Koblenz, Germany
Treatment:	0, 0.298, 0.954, 3.05, 9.77, 31.3 and 100 µg test item/L		0 μg test item/L
Test units:			
Test vessels:	2 L glass beakers filled with 350 g moist test sediment and 1.5 L test medium		st test sediment and 1.5 L test medium
Test sediment: Artificial soil according to OECD guideline 219, containing 4 % sphagnum peat, 20 % kaolin clay, 75-76 % quartz sand, 0.2 % CaCO3, 2 % organic carbon content and 100 mg ammonium chloride and sodium phosphate per kg dry sediment			
Test medium:	Smart and Barko growth medium		
Environmental c	vironmental conditions:		
	Tempe	ture: $20.1 - 21.9 \ ^{\circ}\text{C}$	
	pH:	mean at test start:	8.18 and mean at test end: 8.98
	Oxyger	content: mean 108 – 145 %)
		Photoperiod: 16	hours light: 8 hours darkness (9600 - 11000 lux)

Results:

The mean analytically determined concentration at test start was 98 % of the nominal concentration and at test end this concentration was 82 % of the nominal concentration. Consequently, all study results were based on nominal concentrations.

Under the experimental conditions, the 14-day E_rC_{50} and E_yC_{50} based on shoot length were 6.43 and 3.59 µg test item/L, respectively. For shoot fresh weight, the 14-day E_rC_{50} and E_yC_{50} were calculated to be 6.48 and 2.69 µg test item/L, respectively. The 14-day E_rC_{50} and E_yC_{50} for dry weight were > 100 and 15.4 µg test item/L, respectively. The NOEC for shoot length and fresh weight was determined to be 0.954 µg test item/L and for dry weight the NOEC was 3.05 µg test item/L

The validity criteria of OECD 239 (2014) are met. The study is relevant and acceptable.

Observations of sublethal effects (such as necrosis, chlorosis or damage) are insufficiently reported, but apparently no sublethal effects were observed other than reduced growths.

11.5.4 Acute (short-term) toxicity to other aquatic organisms

No data available

11.6 Long-term aquatic hazard

Method	Species	Test material	Results [mg/L]	Remarks	Reference
OECD 204 21d (flow- through)	Oncorhynchus mykiss Rainbow trout	Tribenuron- methyl	Length, weight survival, NOEC = 560 (mean measured)		DUP, Hutton, D.G., 1989, HLR 311-89
OECD 210 28d (flow- through) Early lifestage (ELS)	Cyprinodon variegatus Sheepshead minnow	Tribenuron- methyl	Larval length weight, survival, NOEC = 11.9 (mean measured)	Key study	DUP, Rebstock, M., 2012, DuPont-33943
OECD 202 21d (static- renewal)	<i>Daphnia magna</i> Water flea	Tribenuron- methyl	Adult length, NOEC = 120 Reproduction, EC ₁₀ = 52 (mean measured)		DUP, Hutton, D.G., 1989 Hoke, R.A. 2013 HLR 164-89, Revision No. 1
OECD 211 21d (static- renewal)	<i>Daphnia magna</i> Water flea	Tribenuron- methyl	Adult length, NOEC = 114 (nominal)		DUP, Rebstock, M., 2013, DuPont-35848 Revision No. 1
OECD 211 21d (static- renewal)	<i>Daphnia magna</i> Water flea	Tribenuron- methyl	Mortality, reproduction, NOEC = 41 (nominal)	Key study	TTF, Zawadsky, C., 2015 329 TBM
OECD 201 72h (static)	<i>Pseudokirchneriella</i> <i>subcapitata</i> Green algae	Tribenuron- methyl	Growth rate, NOEC = 0.004 ErC ₁₀ = 0.011 (nominal)	Key study	DUP, Sloman, T.L., Leva, S.E., 1998, DuPont-1222
OECD 201 72h (static)	<i>Anabena flos-aquae</i> Cyanobacteria	Tribenuron- methyl	Growth rate, NOEC = 10 ErC ₁₀ = 13.2 (nominal)		TTF: Hermes, H., Sonntag, F. (2016) Ibacon Project 118631218
US EPA guideline 123-2 14d (static)	<i>Lemna gibba</i> Duck weed	Tribenuron- methyl	Growth rate, NOErC = 0.001 ErC ₁₀ = 0.0024 (nominal)		DUP, Kannuck, R.M., Samel, A., 2000, AMR 3070-94, Revision No. 1

					Scown, T., et al 2014 DuPont-41634
14d (static)	Myriophyllum spicatum	Tribenuron- methyl	Growth rate, NOEC = 94 Necrosis, NOEC = 0.87 ErC ₁₀ = 3.5 Apical bud damage, NOEC = <0.0022 (mean measured)		DUP, Kirkwood, A., 2015 DuPont-32239, Revision No. 2
OECD 239 14d (static)	Myriophyllum spicatum	Tribenuron- methyl	Growth rate (fresh weight), NOEC = 0.00095 $ErC_{10} = 0.00081$ (nominal)	Key study	TTF, Gonsior , G., 2015, 297 TBM amdt-1
14d (static)	Elodea canadensis	Tribenuron- methyl	Chlorosis, NOEC = 1.0 Growth rate (biomass), NOEC = 10 Shoot dry weight, NOEC = 0. 1 (nominal)		DUP, Kirkwood, A., 2013 DuPont-32243, Revision No. 1

11.6.1 Chronic toxicity to fish

Tribenuron-methyl shows a low chronic toxicity to fish. The NOEC of **11.9 mg/L** determined in the early life stage test with sheepshead minnow is chosen for the chronic toxicity of the substance.

Reference:	DUP: Hutton, 1989a Flow-through 21-day LC50 and NOEC of DPX-L5300-20 to rainbow trout (<i>Salmo gairdneri</i>)
Company Banart Na	HLR 311-89
Report No.: Guideline:	OECD Guideline 204 (1984)
GLP:	Yes
Material and n	nethods:
Test material:	Tribenuron methyl technical
Lot/Batch #:	L5300-20
Purity:	95.8%
Test system/test conditions:	The chronic effect of tribenuron-methyl on rainbow trout was examined in a 21-day study under flow-through conditions. The mean length of the fish was 2.7 cm and the mean wet weight was 0.41 g. pH of the stock solution was elevated by NaOH to promote the dissolution of the test substance. Ten fish per test concentration (two replicates of 5 fish each) were exposed to the following nominal test concentrations: 31, 62, 125, 250 and 500 mg/l, along with a dilution water control. The water temperature during the test was 10 - 14°C, the pH was 6.3-7.8, and the O ₂ -content was 9.8-10.8 mg/l. Hardness and alkalinity was 76 and 84 mg/l, respectively. The flow velocity was six aquaria turnovers (7 litres) per 24 hours.

Results: Recovery was in the range of 96 to 112 % of nominal concentrations. No mortality occurred during the course of the study. A few fish darkened in colour, but recovered before study termination. All dose groups had a significantly shorter body length than the control. There was no dose-trend in the effects on body length, and the finding was probably due to the fact that the fish in one of the control groups by chance were relatively large compared to the other fish. The 21 days EC_{50} and LC_{50} were above 560 mg/l, and NOEC was set to 560 mg/l. The values are based on measured concentrations.

The study was conducted under guideline OECD 204 (1984). The validity criteria of OECD 204 (1984) are fulfilled. A review of this study indicates that it partially meets the current guideline; deviations include that the oxygen

concentration dropped below 60% in all of the test solutions and the control at some point during the study. However, reconducting the study is unlikely to yield a significantly different result. The study is considered valid The temperature is lower and variation exceeds the recommendation in the guideline (test: 10.1 - 13.8 °C; Guideline: 13-17°C with maximum ± 2°C variation). However, it is not likely that this deviation substantially influenced the results. All dose groups had a significantly shorter body length than the control. However, there was no dose-trend in the effects on body length, and the finding was most likely due to the fact that the fish **in only one of the 2** control groups by chance were relatively large compared to the other fish. Therefore, the observed decrease in length was likely not a result of the exposure.

Reference:	DUP: Rebstock 2012 Tribenuron-methyl (DPX-L5300) technical: Early life-stage toxicity test with the sheepshead minnow, <i>Cyprinodon variegatus</i> , under flow-through conditions
Company Report	est with the sheepshead miniow, cyprinouon varies and in the anough conditions
No.:	DuPont-33943
Guideline:	OECD 210 (1992), U.S. EPA 850.1400 (1996)
GLP:	Yes
Material and meth	ods:
Test material:	Tribenuron-methyl technical
Lot/Batch #:	L5300-281
Purity:	98.2%
Control:	Dilution (laboratory blended water) water
Solvent control:	None
Test vehicle:	None
Toxic reference:	None
Test organism:	Sheepshead Minnow
Species:	Cyprinodon variegatus
Age at dosing:	<24 hours
Initial population:	20 embryos per test chamber
Source:	In-house culture
Diet:	Brine shrimp nauplii and/or salmon starter at least twice daily except 24 hours prior to termination
Test chamber:	Glass aquaria measuring approximately 15 cm wide by 22 cm long by 24 cm high with a test solution depth of 14 cm - 28d post-hatch
Experimental treatments	 The fish were fed during treatment. unaerated, flow-through, nominal concentrations of 0 (control), 0.63, 1.3, 2.5, 5.0, and 10 mg a.s./L. 20 embryos
Environmental conditions (in-life period)	were used per replicate with four replicates per test concentration and control
Temperature:	21.1 to 24.9°C for fry
Photoperiod:	16 hr photoperiod (646 lux) and 8 hr darkness which included 30 min transitional light preceding and following the 16-hr light interval
Endpoints and	
observations	egg hatchability, post-hatch survival, standard length, and blotted wet weight
Statistics	The no-observed-effect concentration (NOEC) and lowest-observed-effect concentration for egg hatchability, fish survival (28-day post-hatch), standard length, and blotted wet weight, were estimated using a one-way analysis of variance (ANOVA) procedure and a one-tailed Dunnett's test, with the alternate hypothesis being the mean for the parameter was reduced in comparison to the control mean. Prior to the Dunnett's test, a Shapiro Wilk's test and a Levene's test were conducted to test for normality and homogeneity of variance, respectively,

over treatments at each time point. The results from the Shapiro-Wilk's and Levene's tests indicated non-normality and heterogeneity of variance for percent hatch and post-hatch survival. Therefore, these parameters were analysed with non-parametric analyses on the ranks of the values. The results from the Shapiro-Wilk's and Levene's tests indicated normality and homogeneity of variance for standard length and blotted wet weight. Therefore, these parameters were analysed with a parametric ANOVA and Dunnett's test on the non-transformed data.

Results:

The mean measured concentrations of tribenuron-methyl in the control and test substance treatments during the study were <LOD (control), 0.754, 1.46, 2.99, 6.03, and 11.9 mg a.s./L, which represented 112 to 121% of the nominal concentrations. No residues of tribenuron-methyl were detected in the control above the LOD of 0.036 mg a.s./L. All test acceptability criteria were met with the exception of the $25 \pm 2^{\circ}$ C temperature range. The temperature was below the protocol-specified range in the control and test treatment replicates at initiation, but remained within specifications for the remainder of the test. This deviation did not impact the overall quality and results of the study. Based on mean measured concentrations of tribenuron-methyl , the NOEC values for egg hatchability, post-hatch survival, standard length, and blotted wet weight was 11.9 mg a.s./L, the highest mean measured concentration tested.

11.6.2 Chronic toxicity to aquatic invertebrates

Tribenuron-methyl shows a low chronic toxicity to aquatic invertebrates. The lowest value is the NOEC of **41** mg/L.

Reference:	DUP: Hutton 1989b Chronic toxicity of IN-L5300-20 to <i>Daphnia magna</i> DUP: Hoke 2013 Chronic toxicity of IN L5300-20 to <i>Daphnia magna</i>
Company Report No.:	164-89, Revision No. 1
Guideline:	OECD 202 (1984)
GLP:	Yes
Material and n	nethods:
Test material:	Tribenuron-methyl
Lot/Batch No:	IN-L5300-20 (15, 527)
Purity:	95.8% (w/w)
Test system/test conditions:	The chronic toxicity of tribenuron-methyl (based on immobilisation, growth and reproduction) to <i>Daphnia magna</i> was evaluated in a static renewal test over an exposure period of 21 days. Forty daphnids (ten replicates of 4 daphnids each) per test concentration were exposed to nominal concentrations of 31, 62, 125, 250, 500, and 1000 mg/l, in addition to a dilution water control. The water temperature during the test was 20°C, the pH was 7.1-8.8, and the O2-content was 4.7-8.7 mg/l. Hardness and alkalinity was 75±2 and 82±2 mg/l, respectively.

Results:

Measured concentrations remained between 92 and 116 % of nominal. Results are presented based on average measured values.

Only in the highest dose group the survival was significantly lower than in the control. Hence, the NOEC for survival was 480 mg/l, and the LOEC was 940 mg/l. The 21-day EC_{50} for immobilisation was > 940 mg/l. Growth was the most

sensitive parameter, as concentration levels of 250 mg/l and higher produced significantly shorter average adult lengths than the control group. Thus, the NOEC for growth was 120 mg/l and the LOEC was 250 mg/l. All results were based on measured concentrations.

ECx/NOEC	Endpoint (mg/L)	95% Confidence interval (mg/L)
EC ₁₀ =	51.6	(33.0 - 70.3)
EC ₂₀ =	109.4	(70 - 148.8)
EC ₅₀ =	339.8	(217.3 - 462.3)
NOEC=	250	-

The RMS requested a closer look at the reproduction data. The results are:

The study fulfils the validity criteria stated in OECD 211 (2012).

The oxygen concentration is below 60% saturation at some points in all test solutions including control, but not dose related. However, the requirement of OECD 211 (Daphnia reproduction) is met, i.e. the oxygen concentration is always above 3 mg/L.

Reference:	DUP: Rebstock 2013 Tribenuron-methyl (DPX-L5300) technical: Chronic toxicity to the cladoceran, <i>Daphnia magna</i> , determined under statistical renewal test conditions
Company Report	
No.:	DuPont-35848, Revision No. 1
Guideline:	OECD 211 (2008),
GLP:	Yes
Material and meth	ods:
Test material:	Tribenuron-methyl technical
Lot/Batch #:	L5300-281
Purity:	98.2%
Control:	Dilution water (laboratory blended fresh water)
Solvent control:	NA
Test vehicle:	Dilution water (laboratory blended fresh water)
Toxic reference:	None
Test organism:	Cladoceran
Species:	Daphnia magna
Age at dosing:	Neonates (<24 hours old)
Initial population:	10 daphnids per treatment
Source:	In-house culture
Diet:	Test period: algal suspension (Pseudokirchneriella subcapitata) plus a prepared invertebrate food (YCT)
Test chamber:	Glass jars measuring approximately 6.5 cm high with a diameter of 5.0 cm and a solution depth of 3.5 cm
Experimental treatments	The chronic toxicity of tribenuron-methyl to <i>Daphnia magna</i> was determined in a static- renewal, 21 day test. Treatments consisted of a dilution water control and five nominal concentrations of 7.5, 15, 30, 60, and 120 mg a.s./L. Ten daphnids were used per treatment.
Environmental conditions (in-life period)	
Temperature:	19.4 to 20.3°C (of replicate test chambers)
Photoperiod:	16 hr photoperiod (588 lux) and 8 hr darkness which included 30 min transitional light preceding and following the 16-hr light interval
Dissolved oxygen: pH:	6.4 to 8.9 mg/L 7.7 to 8.6

Endpoints and observations	number of surviving adult daphnids, occurrence of abnormalities, and production of neonates
observations	The no-observed-effect concentration (NOEC) and lowest-observed-effect concentration (LOEC) for mortality/immobility data were determined by using a one-tailed Dunnett's test and a Fisher's exact test with the alternate hypothesis being that the mean for the parameter was reduced in comparison to the control mean. A Hochberg adjustment was used to control the experiment-wise error rate for the Fisher's test at the same level (p = 0.05). Reproduction, length and weight data were analysed with a one-way analysis of variance (ANOVA) procedure and a one-tailed Dunnett's test with the alternate hypothesis being that the mean for the parameter was reduced in comparison to the control mean. Prior to the Dunnett's test, a Shapiro Wilk's test and a Levene's test were conducted to test for normality and homogeneity of variance, respectively, over treatments at each time point. The results from the Shapiro-Wilk's and Levene's tests indicated the assumptions of normality and homogeneity of variance were not met for the survival and time to first brood data. Therefore, these parameters were analysed with a parametric ANOVA and Dunnett's test on the ranks of the values. Assumptions of normality and homogeneity of variance were met for reproduction and length data. These parameters were analysed with a parametric ANOVA and Dunnett's test on the untransformed data. Estimates of the EC50 concentration values and their 95% confidence limits for immobilisation data were calculated using the probit method and Trimmed Spearman-Karber method. When the p value for Goodness of Fit was >0.05 and there was no other evidence of questionable convergence, the probit method was selected for reporting. When this criterion was not
	achieved, the Trimmed Spearman-Karber method was selected for reporting.

Results:

The mean, measured concentrations of tribenuron-methyl during the 21-day exposure were 7.94, 15.4, 29.7, 57.3, and 114 mg a.s./L or 95 to 106% of nominal. No residues of tribenuron-methyl were detected in the dilution water control solution above the LOD of 0.0386 mg a.s./L, with the exception of the Day 21 sample in which a single replicate of the 7.5 mg a.s./L treatment was erroneously composited with the control replicates. The relevant test acceptability criteria were met for this study. The water-quality characteristics remained within the tolerance limits set forth in the protocol. Survival of the dilution water control daphnids was 80%. The average number of live young per surviving first generation daphnid was 181 and no ephippia were produced by control animals.

Conclusion:

Based on survival and mean measured concentrations, the 21-day NOEC and LOEC were 114 and >114 mg a.s./L, respectively. MATC values could not be calculated. The 7-, 14-, and 21-day EC_{50} value, based on immobilisation of the first generation daphnids, was >114 mg a.s./L, the highest concentration tested.

Based on days to first brood, number of young produced, and mean measured concentrations, the NOEC and LOEC values were 114 and >114 mg a.s./L, respectively.

Based on adult length and mean measured concentrations, the NOEC and LOEC values were 114 and >114 mg a.s./L, respectively.

The study fulfils the validity criteria stated in OECD 211 (2012).

Reference:	TTF: Zawadsky, C., 2015 Tribenuron-Methyl TC: Toxicity to the water Flea <i>Daphnia magna</i> Straus under Laboratory Conditions (Reproduction Test)
Company Report	
No.:	329 TBM
Guideline:	OECD 211 (2012),
GLP:	Yes

Material and methods:		
Test material:	Tribenuron-methyl TC	
Batch no.:	63B3011159	
Purity:	98.23 % w/w	
Description:	Light brown solid	
Test organism:	Daphnia magna STRAUS, Clone V	
Age:	< 24 hours, at test initiation	
Source:	In-house culture, originally purchased from the Federal Environmental Agency in Berlin,	
Germany		
Diet:	Single cell green algae (Desmodesmus subspicatus), provided daily	
Treatment:	0, 1.05, 2.63, 6.56, 16.4 and 41.0 mg test item/L, semi-static conditions, with renewal of	
	test solutions every Monday, Wednesday and Friday.	
Test medium:	Elendt M4	
pH:	7.74 - 8.01	
Dissolved oxygen:	8.4 – 8.8 mg/L	
Hardness:	232 – 250 mg CaCO3/L	
Test vessels:	100 mL Glass beakers, containing 50 mL test medium	
Environmental conditions:		
Temperature:	19.1 – 21.8 °C	
pH:	7.35 - 8.46	
Dissolved oxygen:	6.9 – 10.8 mg/L	
Photoperiod:	16 hours light: 8 hours darkness	
Light intensity:	1250 lux	

Observations: Mortality, presence of eggs in the brood pouch, males or winter eggs, obvious differences in condition and size of the adult daphnids.

Number of offspring, body length of the adult daphnids.

Statistics: For determination of the LOEC and NOEC the data was first tested for normality and homogeneity of variance using Shapiro-Wilk test and Bartlett's test, respectively. Thereafter, the Dunnett's t-test was performed to compare the treatment groups with the control. All data was analysed using SAS Proprietary Software Version 9.3.

Results:

In the fresh medium the measured concentrations were between 100 and 111 % of the nominal test concentrations. The aged medium showed measured concentrations from 97 to 121 % of nominal test concentrations. Therefore, all results were based on nominal concentrations.

During the test no unusual observations were made for the control or any of the test item concentrations. In the control group and in the group exposed to the highest test item concentration of 41.0 mg/L two daphnids died. In the other test groups, one dead daphnid was observed.

The mean number of live offspring produced per adult in the control group was 107.4. There was no statistically significant difference in the number of offspring per adult between any of the test item exposed groups and the control

The 21-day NOEC for tribenuron-methyl was 41.0 mg/L and the LOEC was >41.0 mg/L.

The study fulfils the validity criteria stated in OECD 211 (2012).

11.6.3 Chronic toxicity to algae or other aquatic plants

Several studies are available. Both algae and aquatic plants are sensitive to tribenuron-methyl, which is expected for a herbicide. Higher plants are more sensitive than algae. The lowest EC_{10} is **0.00081 mg/L** derived with *Myriophyllum spicatum*.

The study summaries are found in chapter 11.5.3.

11.6.4 Chronic toxicity to other aquatic organisms

No data available

11.7 Comparison with the CLP criteria

11.7.1 Acute aquatic hazard

Adequate acute toxicity data are available for all taxonomic levels (fish, crustacea and algae or other aquatic plants).

The 14d ErC₅₀ for *Lemna gibba* of 0.0047 mg/L is lower than the classification criterion for Category Acute $1: \le 1$ mg/l. The appropriate M-factor is 100, since the toxicity is within the range $0.001 < L(E)C_{50} \le 0.01$.

11.7.2 Long-term aquatic hazard (including bioaccumulation potential and degradation)

Adequate chronic toxicity data are available for all taxonomic levels (fish, crustacea and algae or other aquatic plants).

Tribenuron-methyl is not rapidly degradable in the aquatic environment.

The 14d EC_{10} for *Myriophyllum spicatum* of 0.00081 mg/L is lower than the classification criterion for Category Chronic 1: ≤ 0.1 mg/l. The appropriate M-factor is 100, since the toxicity is within the range of 0.0001 < $EC_{10} \leq 0.001$.

Tribenuron-methyl has a low potential for bioaccumulation (log Kow≤4).

11.8 CONCLUSION ON CLASSIFICATION AND LABELLING FOR ENVIRONMENTAL HAZARDS

Tribenuron-methyl shall be classified as

(a) Acute (short-term) aquatic hazard

Category Acute 1. M-factor = 100

(b) Long-term aquatic hazard

Category Chronic 1. M-factor = 100

12 EVALUATION OF ADDITIONAL HAZARDS

12.1 Hazardous to the ozone layer

No data available

13 ADDITIONAL LABELLING

Not relevant

14 REFERENCES

Reference lists are included in Annex I – IV.

15 ANNEXES

Further details, including study summaries of the referred data are provided in Annex I – IV to this CLH-report:

Annex I Physical and Chemical properties

Annex II Toxicology and metabolism

Annex III Environmental Fate and Behaviour

Annex IV Ecotoxicology