TC NES SUBGROUP ON IDENTIFICATION OF PBT AND VPVP SUBSTANCES

RESULTS OF THE EVALUATION OF THE PBT/VPVB PROPERTIES OF:

Substance name: Butanamide, 2,2’[(3,3’-dichloro[1,1’-biphenyl]-4,4’diyl)bis(azo)]bis[N-(4-chloro-2,5-dimethoxyphenyl)-3-oxo- (C.I. Pigment Yellow 83)

EC number: 226-939-8
CAS number: 5567-15-7
Molecular formula: C_{36}H_{32}Cl_{4}N_{6}O_{8}

Summary of the evaluation:

The substance is not considered to be a PBT or a vPvB substance. It does not meet the B (or vB) criterion, or the T criterion. It is considered likely to meet the P (and vP) criterion in order to fulfil its technical specification (it is a pigment).
JUSTIFICATION

1 IDENTIFICATION OF THE SUBSTANCE AND PHYSICAL AND CHEMICAL PROPERTIES

Name: 2,2’-[3,3’-dichloro[1,1’-biphenyl]-4,4’-diyl]bis(azo)]bis[N-(4-chloro-2,5-dimethoxyphenyl)-3-oxobutyramide]
EC Number: 226-939-8
CAS Number: 5567-15-7
IUPAC Name: Butanamide, 2,2’[3,3’-dichloro[1,1’-biphenyl]-4,4’diyl]bis(azo)]bis[N-(4-chloro-2,5-dimethoxyphenyl)-3-oxo-
Molecular Formula: C_{36}H_{32}Cl_{4}N_{6}O_{8}

Molecular Weight: 818.5
Synonyms: C.I. 21108, Pigment Yellow 83

1.1 PURITY/IMPURITIES/ADDITIVES

Purity > 96% w/w. Typical impurities include coupling agent CAS 4433-79-8 (0.5-2.5%), 3,3’-dichlorobenzidine (< 25 ppm) and water (< 1%).
1.2 PHYSICO-CHEMICAL PROPERTIES

Table 1 Summary of physico-chemical properties

<table>
<thead>
<tr>
<th>REACH ref Annex, §</th>
<th>Property</th>
<th>Value</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>V, 5.1</td>
<td>Physical state at 20°C and 101.3 KPa</td>
<td>Solid</td>
<td>Powder</td>
</tr>
<tr>
<td>V, 5.2</td>
<td>Melting / freezing point</td>
<td>400°C</td>
<td></td>
</tr>
<tr>
<td>V, 5.3</td>
<td>Boiling point</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>V, 5.5</td>
<td>Vapour pressure</td>
<td>$2.4 \times 10^{-23}$ Pa at 25°C</td>
<td>Calculated value at 25°C (EPIWIN v3.10)</td>
</tr>
<tr>
<td>V, 5.7</td>
<td>Water solubility</td>
<td>&lt; 0.02 mg/l at 25°C</td>
<td>Pre-treated at 80°C for 7h (as above)</td>
</tr>
<tr>
<td>V, 5.8</td>
<td>Partition coefficient n-octanol/water (log value)</td>
<td>7.1</td>
<td>Calculated value at 25°C (EPIWIN v3.10)</td>
</tr>
<tr>
<td>VII, 5.19</td>
<td>Dissociation constant</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2 MANUFACTURE AND USES

Not relevant.

3 CLASSIFICATION AND LABELLING

This substance is not classified in the Annex I of Directive 67/548/EEC.

4 ENVIRONMENTAL FATE PROPERTIES

4.1 DEGRADATION (P)

4.2 ABIOTIC DEGRADATION

The calculated half-life for photo-oxidation of Pigment Yellow 83 in air is 1.7 hours. However, this substance will not be present in the air compartment due to its low volatility.

Pigment Yellow 83 is practically insoluble in water. Hydrolysis of the amide bond under environmental conditions is not likely. A half-life of > 1 year was predicted using the HYDROWIN program (v1.67), but a hydrolysis study cannot be carried out as the current analytical method is not sufficiently sensitive to measure the dissolved portion of this substance.

4.2.1 Biotic degradation

Limited biodegradation was reported for a sample of Pigment Yellow 83 of unknown purity. The validity of this study could not be assigned. This substance is predicted to be not readily biodegradable (EPIWIN v3.12).
4.2.2 Other information

Industry have agreed that this substance is likely to meet the P criterion in order to fulfil its technical specification (it is a pigment).

4.2.3 Summary and discussion of persistence

This substance is considered to be persistent in order to perform its technical function as a pigment. Industry have agreed that it is likely to meet the P criterion.

4.3 ENVIRONMENTAL DISTRIBUTION

4.3.1 Adsorption

4.3.2 Volatilisation

4.4 BIOACCUMULATION (B)

4.4.1 Screening data

A log $K_{ow}$ of 7.1 (calculated at 25°C) may indicate a high potential for bioaccumulation. However, there is some uncertainty in QSAR predictions at such high log $K_{ow}$ values. A BCF of 45,000 was calculated using equations in the TGD based on a log $K_{ow}$ of 7.1. BCF values of 10 and 0.76 were predicted using the USEPA EPIWIN BCF-program and from Banerjee et al. (1991), respectively. The difference in these values is due to the different ways the models treat substances with log $K_{ow} > 6$.

Other properties are considered to be relevant to the consideration of bioaccumulation for such substances (Comber et al., 2005). The solubility in octanol has been measured as 0.02 mg/l. Comber et al. (2005) propose a cut-off value for octanol solubility of 0.002 * MW mg/l, below which uptake to toxicologically significant levels is not expected. For a molecular weight of 818.5, this is a cut-off of 1.64 mg/l. The measured value is well below this, and hence indicates that Pigment Yellow 83 is not expected to accumulate to significant levels. This is supported by the lack of any indications of toxicity in exposures up to the solubility of the substance (see Section 6).

4.4.2 Measured bioaccumulation data

4.4.3 Other supporting information

---

1 For example, half life from field studies or monitoring data
2 For example, log $K_{ow}$ values, predicted BCFs
3 For example, fish bioconcentration factor
4.4.4 Summary and discussion of bioaccumulation

Although this substance has a high predicted log $K_{ow}$ which may indicate high bioaccumulation, other properties are considered to be more relevant for this substance. The low octanol solubility is well below the cut-off for low accumulation proposed in Comber at al. (2005). The conclusion is that the substance has a low potential for bioaccumulation.

4.5 SECONDARY POISONING

5 HUMAN HEALTH HAZARD ASSESSMENT

Data not reviewed for this report. This substance is not classified in Annex I and so has no classifications relevant to the T criterion.

6 ENVIRONMENTAL HAZARD ASSESSMENT

6.1 AQUATIC COMPARTMENT (INCLUDING SEDIMENT)

Fish

An acute 96-hour study with *Brachydanio rerio* is available for Pigment Yellow 83 (94.5% pigment technical grade and 5.5% additive) (Schnurstein, 2002). On exposure to a filtered solution prepared at a loading of 100 mg/l, no effects were seen.

Three 48-h studies exposing this substance to *Oncorhynchus mykiss*, *Phoxinus laevis* and *Leuciscus idus* resulted in LC50 values of 18-80 mg/l, 45 mg/l and >70 mg/l, respectively (Hamburger et al., 1977). All studies were carried out with a preparation of Pigment Yellow 83 in ethylene glycol, but information on the actual concentrations tested and the exact composition of the test substance is lacking. Hence these tests are not considered of sufficient quality to be used in the assessment.

Algae

A 72-hour study exposing *Selenastrum capricornutum* to a clear filtered solution of Pigment Yellow 83 prepared at a loading of 100 mg/l is available (Migchielsen, 2002). An EC50 > water solubility and a NOEC ≥ water solubility were established which indicates that this substance does not show significant effects on algal growth at the limit of water solubility (nominal concentration 100 mg/l).

6.2 TERRESTRIAL COMPARTMENT

6.3 ATMOSPHERIC COMPARTMENT

6.4 INDIRECT EXPOSURE VIA THE FOOD CHAIN

For example, measured concentrations in biota
7 PBT AND VPVB

7.1 PBT, VPVB ASSESSMENT

Persistence: Pigment Yellow 83 is predicted to be not readily biodegradable (EPIWIN v3.12). The substance is considered to be persistent, meeting the P (and potentially the vP) criterion.

Bioaccumulation: although this substance has a high predicted log $K_{ow}$ which might indicate a high potential for bioaccumulation, other more relevant properties indicate a low potential for bioaccumulation. In particular, the solubility in octanol is very low, 0.02 mg/l, and is well below the cut-off for significant uptake potential in Comber et al. (2005), which is calculated as 1.64 mg/l for this substance. The conclusion is therefore that the substance does not meet the B or vB criteria.

Toxicity: the 72-hour $EC_{50}$ for *Selenastrum capricornutum* > water solubility (0.02 mg/l at 25°C) and the NOEC ≥ water solubility. Pigment Yellow 83 does not show significant effects on algal growth at the limit of water solubility (nominal concentration 100 mg/l). No effects were seen in 96-hour study where *Brachydanio rerio* was exposed to Pigment Yellow 83 at a loading of 100 mg/l. Based on the very low water and n-octanol solubility exposure of aquatic organisms to this substance is expected to be low. The substance is considered not to meet the T criterion.

Summary: Pigment Yellow 83 is considered to meet the P and vP criteria with a reasonable degree of confidence. However, it does not meet the T criterion and is considered not to meet the TGD B or vB criteria. Therefore it is not considered a PBT substance according to the EU criteria.
INFORMATION ON USE AND EXPOSURE

Not relevant as substance is not identified as a PBT.

OTHER INFORMATION

The information used in this report was taken from the following source:

SIDS Initial Assessment Report for SIAM 16 (C.I. Pigment Yellow 12, 13 and 83), United Kingdom, 2003.

Discussion paper for the TC NES subgroup on PBTs, Mike Comber, Steve Robertson and Dick Sijm, 2005.