Section 7.4 and 7.5 **Annex Points IIA 7 and IIIA 13.2/3**	**Bridging of eco-toxicity data from DMST to DMSA**	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [X] **Limited exposure [...]**	**Technically not feasible [ ]** **Scientifically unjustified [ ]** **Other justification [X].**	
Detailed justification:	Aquatic and terrestrial toxicity data for the degradation product of the active substance dichlofluanid, **DMSA** (Dimethylsulfanilid, CAS 4710-17-2), are bridged from the degradation product of the active substance tolylfluanid (CAS 731-27-1), **DMST** (Dimethylaminosulfotoluidid, CAS 66840-71-9), in the scope of the PT 21 dossier for dichlofluanid. This bridging is justified because both the actives and their degradation products are very similar with regard to their chemical structure, aqua-toxicity and environmental behaviour. DMST has a considerably larger data base than DMSA. In addition DMST is slightly more eco-toxic than DMSA in aquatic toxicity tests which are available for both compounds. Therefore this bridging approach is related more to a "worst case". Details on the comparison of both actives and their degradation products, DMST and DMSA are presented in Document IIA.	
Undertaking of intended data submission [ ]	–	
	Evaluation by Competent Authorities	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	25/03/2014	
Evaluation of applicant's justification	Tolylfluanid and dichlofluanid are similar in chemical structure and toxicity. The Applicant presents a comparison in Document IIA that shows that the environmental fate of the two substances is similar. The UK CA accepts that the fate data for the active substances and the metabolites is sufficiently similar to justified the bridging approach used.	
Conclusion	The justification is acceptable.	
Remarks	No further comments	
	COMMENTS FROM OTHER MEMBER STATE *(specify)*	
Date	*Give date of comments submitted*	
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*	
Conclusion	*Discuss if deviating from view of rapporteur member state*	
Remarks		