Section 7.4.3.4b Annex Point IIIA 13.2.4	Effects on reproduction and growth rate on an appropriate marine invertebrate species.	
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ] **Limited exposure [X]**	**Technically not feasible [X]** **Scientifically unjustified [X]** **Other justification [X].**	
Detailed justification:	A test on reproduction and growth rate on an appropriate marine invertebrate species was not performed due to the following reasons: In seawater the active dichlofluanid is very rapidly hydrolysed and detoxified to DMSA (Dimethylaminosulfanilide, CAS 4710-17-2). The DT 50 of dichlofluanid at pH 8.2 and 20°C is 1.2 hours. Therefore no long time exposure of marine organisms to dichlofluanid can be expected. In addition the rapid degradation of the active at high pH values causes problems with regard to the technical feasibility of the test. In the corresponding freshwater study the pH was about 7.3 at low concentrations, therefore a higher stability of the active was achieved (DT 50 at pH 7 and 20 °C = 19 hours). Due to the very low concentrations which has to be kept stable in a flow through test artefacts are likely to occur the more rapid the degradation would be. In addition according to TGD on marine risk assessment (2003) a study on a marine invertebrate will not improve the assessment factor if a study on freshwater invertebrate is already available. This is because the sensitivity of marine and freshwater invertebrates is assumed to be not much different. This assumption is supported by acute invertebrate data which are available for dichlofluanid on marine and freshwater species (see document IIA). Taking the above mentioned arguments into account it is justified not to perform a test on reproduction and growth rate on a appropriate marine invertebrate species.	
Undertaking of intended data submission [ ]	–	

Section 7.4.3.4b **Annex Point IIIA 13.2.4**	**Effects on reproduction and growth rate on an appropriate marine invertebrate species.**
	Evaluation by Competent Authorities
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	19/11/13
Evaluation of applicant's justification	The Technical Guidance Document of Risk Assessment (2003) states that in relation to differences between marine and freshwater aquatic organisms, no comparison of long-term effects data has been made due to the lack of suitable data but that there are no reasons to believe that a systemic bias to freshwater or marine species would exist. Therefore, it is proposed that data on freshwater or marine fish, crustacean and algae be used interchangeably for evaluation of the risks to either compartment. A PNECwater for saltwater has been derived based on chronic freshwater studies, in line with TGD (2003) guidance. Acute studies with freshwater and marine aquatic invertebrate species indicate similar sensitivities to dichlofluanid (*Daphnia magna* EC50 = 0.42 mg a.s./L while *Corophium volutator* EC50 > 0.386 mg a.s./L).
Conclusion	The applicant's justification is accepted. No further data on the reproductive risk to marine invertebrates is required.
Remarks	
	COMMENTS FROM OTHER MEMBER STATE *(specify)*
Date	*Give date of comments submitted*
Evaluation of applicant's justification	*Discuss if deviating from view of rapporteur member state*
Conclusion	*Discuss if deviating from view of rapporteur member state*
Remarks	