CONSIDERATIONS OF ALTERNATIVE METHODS ON TESTING PROPOSALS IN YOUR REGISTRATION

Please complete this form and provide information for each of the points below.

If you have more than one testing proposal, please copy and paste the three bullet points within the same document and complete the details as appropriate for each testing proposal.

This document will be published on ECHA website along with the third party consultation on the testing proposal(s).

Public substance name: 2,2'-(C16-18 (evennumbered, C18 unsaturated) alkyl imino) diethanol
EC Number (omit if confidential): 620-540-6
CAS Number (omit if confidential): 1218787-32-6

Date of considerations: 11 January 2016

- Hazard endpoint for which vertebrate testing was proposed:

  Reproductive toxicity (extended one-generation reproductive toxicity study) with the analogue substance 2,2'-(Octadec-9-enylimino) bisethanol CAS No 25307-17-9];

- Considerations that the general adaptation possibilities of Annex XI of the REACH Regulation were not adequate to generate the necessary information (instruction: please address all points below):

  - available GLP studies

  There is no GLP reproduction study available for this substance or for the analogue

  - available non-GLP studies

  There is no non-GLP reproduction study available for this substance or for the analogue

  - historical human data

  There is no appropriate human data available to address this end point of possible effects on reproduction

  - (Q)SAR

  QSAR models have been used to support the read across to the analogue. However there are no validated models that can predict if this substance or its analogue can cause developmental/reproduction toxicity or confirm that they will not. Therefore QSAR models cannot be used as an alternative to the extended one generation reproduction study

  - *in vitro* methods

  There are no validated in-vitro alternative methods that can replace an extended one generation reproduction study. It is not possible, with in-vitro models, to account for the influence of the complex processes of absorption, distribution in the body, metabolism and excretion that occur in the whole animal, which will affect the toxic properties of the test substance.

  - weight of evidence

  There is no data on possible effects on reproduction for this substance, some data on the analogue substance is available on developmental toxicity which is being used for read across but there is no reproduction test data available.

· grouping and read-across

Grouping with read across has been proposed to a close structural analogue which will avoid the use of additional animals in studies on this substance.

· substance-tailored exposure driven testing [if applicable]

This substance has quite a wide range of uses so it is not possible to use substance tailored exposure driven arguments to avoid the requirement for this study.

· [approaches in addition to above [if applicable]

No other approaches are considered possible.

· other reasons [if applicable]

No other reasons were identified allowing the one generation study to be waived.

· Considerations that the specific adaptation possibilities of Annexes VI to X (and column 2 thereof) were not applicable (instruction: free text):

This substance is manufactured in volumes greater than 1000 tons and is therefore required to comply with the Annex X requirements of REACH. 8.7.3 of this annex as revised by Commission Regulation (EU) 2015/282, requires an extended one-generation reproduction study including cohorts 1A and 1B unless already provided as part of Annex IX. No reproduction study was previously provided.

The only option listed in Column 2 of 8.7.3 to avoid the need for this study is if there is an existing 2 generation reproduction study available that was initiated before 13 March 2015. No such study is available for this substance or the analogue substance.

There are several options in column 2 with a series of triggers which would lead to a requirement for an F2 generation from cohort 1B and the addition of cohorts 2A and 2B to investigate possible developmental neurotoxicity and a cohort 3 to investigate possible developmental immunotoxicity. Following the guidance document detailed arguments have been provided in the testing proposal which indicate that the requirements for an F2 generation form cohort 1B and cohorts 2A, 2B and 3 are not required for this substance or the analogue that is proposed to be tested in its place. This avoids the unnecessary usage of a large number of experimental animals.