~~Confidential~~

Helsinki, 07 December 2021

Addressees
Registrant(s) of [redacted] as listed in the last Appendix of this decision

Date of submission of the dossier subject to this decision
29/05/2013

Registered substance subject to this decision ("the Substance")
Substance name: Tetrabutylurea
EC number: 224-929-8
CAS number: 4559-86-8

Decision number: Please refer to the REACH-IT message which delivered this communication (in format CCH-D-XXXXXXXXXX-XX-XX/F)

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed in A.1, A.2., A.3., B.1. and B.2. below by ***14 December 2023*** and all other information listed below by ***15 June 2026.***

Requested information must be generated using the Substance unless otherwise specified.

A. Information required from all the Registrants subject to Annex VIII of REACH

1. In vitro gene mutation study in mammalian cells (Annex VIII, Section 8.4.3.; test method: OECD TG 476 or TG 490)

2. Justification for an adaptation of a Short-term repeated dose toxicity (28 days) based on the results of the Sub-chronic toxicity study (90 days) requested below (Annex VIII, Section 8.6.1.)

3. Screening for reproductive/developmental toxicity (Annex VIII, Section 8.7.1.; test method: EU B.63/OECD TG 421 or EU B.64/OECD TG 422) by oral route, in rats

4. Long-term toxicity testing on aquatic invertebrates also requested below (triggered by Annex VIII, Section 9.1.3., column 2.)

5. Long-term toxicity testing on fish also requested below (triggered by Annex VIII, Section 9.1.3., column 2)

6. Simulation testing on ultimate degradation in surface water also requested below (triggered by Annex VIII, Section 9.2.)

7. Soil simulation testing also requested below (triggered by Annex VIII, Section 9.2.)

8. Sediment simulation testing also requested below (triggered by Annex VIII, Section 9.2.)

9. Identification of degradation products also requested below (triggered by Annex VIII, Section 9.2.)

10. Bioaccumulation in aquatic species also requested below (triggered by Annex I, Sections

0.6.1. and 4; Annex XIII, Section 2.1.)

B. Information required from all the Registrants subject to Annex IX of REACH

1. Sub-chronic toxicity study (90-day) (Annex IX, Section 8.6.2.; test method: OECD TG 408) by oral route, in rats

2. Pre-natal developmental toxicity study (Annex IX, Section 8.7.2.; test method: OECD TG 414) by oral route, in one species (rat or rabbit)

3. Long-term toxicity testing on aquatic invertebrates (Annex IX, Section 9.1.5.; test method: EU C.20./OECD TG 211)

4. Long-term toxicity testing on fish (Annex IX, Section 9.1.6.; test method: OECD TG 210)

5. Simulation testing on ultimate degradation in surface water (Annex IX, Section 9.2.1.2.; test method: EU C.25./OECD TG 309) at a temperature of 12°C. Non-extractable residues (NER) must be quantified and a scientific justification of the selected extraction procedures and solvents must be provided.

6. Soil simulation testing (Annex IX, Section 9.2.1.3.; test method: EU C.23./OECD TG 307) at a temperature of 12°C. Non-extractable residues (NER) must be quantified and a scientific justification of the selected extraction procedures and solvents must be provided.

7. Sediment simulation testing (Annex IX, Section 9.2.1.4.; test method: EU C.24./OECD TG 308) at a temperature of 12°C. Non-extractable residues (NER) must be quantified and a scientific justification of the selected extraction procedures and solvents must be provided.

8. Identification of degradation products (Annex IX, 9.2.3.; test method: using an appropriate test method)

9. Bioaccumulation in aquatic species (Annex IX, Section 9.3.2; test method: OECD TG 305, aqueous exposure)

Reasons for the request(s) are explained in the following appendices:

- Appendices entitled "Reasons to request information required under Annexes VIII to IX of REACH", respectively.

Information required depends on your tonnage band

You must provide the information listed above for all REACH Annexes applicable to you, and in accordance with Articles 10(a) and 12(1) of REACH:

- the information specified in Annexes VII, VIII and IX to REACH, for registration at 100-1000 tpa.

In the list of requests above, the same information requirement is mentioned under different Annexes. This is because under REACH that information is required under different conditions, dependent on the tonnage of the registration. While the reasons for the information requirement may thus differ, only one study is requested and to be conducted. All registrants concerned must make every effort to reach an agreement as to who is to carry out the study on behalf of the others under Article 53 of REACH.

You are only required to share the costs of information that you must submit to fulfil your information requirements.

How to comply with your information requirements

To comply with your information requirements you must submit the information requested by this decision in an updated registration dossier by the deadline indicated above. You must also update the chemical safety report, where relevant, including any changes to classification and labelling, based on the newly generated information.

You must follow the general testing and reporting requirements provided under the Appendix entitled "Requirements to fulfil when conducting and reporting new tests for REACH purposes". In addition, you should follow the general recommendations provided under the Appendix entitled "General recommendations when conducting and reporting new tests for REACH purposes". For references used in this decision, please consult the Appendix entitled "List of references".

The studies relating to biodegradation and bioaccumulation are necessary for the PBT assessment. However, to determine the testing needed to reach the conclusion on the persistency and bioaccumulation of the Substance you should consider the sequence in which these tests are performed and other conditions described in Appendix entitled "Requirements to fulfil when conducting and reporting new tests for REACH purposes".

Appeal

This decision, when adopted under Article 51 of REACH, may be appealed to the Board of Appeal of ECHA within three months of its notification to you. Please refer to http://echa.europa.eu/regulations/appeals for further information.

Failure to comply

If you do not comply with the information required by this decision by the deadline indicated above, ECHA will notify the enforcement authorities of your Member State.

Authorised[1] under the authority of Mike Rasenberg, Director of Hazard Assessment

[1] As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Appendix A: Reasons to request information required under Annex VIII of REACH

1. *In vitro* gene mutation study in mammalian cells

An *in vitro* gene mutation study in mammalian cells is an information requirement under Annex VIII to REACH (Section 8.4.3.) in case of a negative result in the *in vitro* gene mutation test in bacteria and the *in vitro* cytogenicity test.

i. Triggering of the study

Your dossier contains negative results for both an Ames test OECD TG 471 and an adequate *in vivo* cytogenicity study OECD TG 474. There is no *in vitro* cytogenicity study as you provided an *in vivo* micronucleus study, with negative results, to adapt the information requirement of Annex VIII, Section 8.4.2. Therefore, the information requirement is triggered.

You did not provide any study that meets this information requirement.

Study design

To fulfil the information requirement for the Substance, either the *in vitro* mammalian cell gene mutation tests using the hprt and xprt genes (OECD TG 476) or the thymidine kinase gene (OECD TG 490) are considered suitable.

2. Justification for an adaptation of the short-term repeated dose toxicity study (28 day)

A Short-term repeated dose toxicity study (28 days) is a standard information requirement in Annex VIII to REACH. This information may take the form of a study record or a valid adaptation in accordance with either a specific adaptation rule under Column 2 of Annex VIII or a general adaptation rule under Annex XI.

You have provided the following studies in your dossier:

i. As a supporting non-guideline study, short-term repeated dose toxicity study (10 days), in rabbits via dermal route, with the Substance, made in 1979, reliability 4, no GLP,

ii. As a key study, a prenatal developmental toxicity study, OECD TG 414 with the Substance was provided, in rats, via dermal route, made in 1980, reliability 2, no GLP.

We have assessed this information and identified the following issues:

Although you do not explicitly claim an adaptation, ECHA understands that the information provided was submitted in order to meet the required information by way of adaptation under Annex, Section XI 1.1.2. This adaptation rule enables registrants to claim that the data from experiments not carried out according to GLP or the test methods referred to in Article 13(3) can be considered equivalent to data generated by those test methods where a number of cumulative conditions are met. This includes, in particular, adequate and reliable coverage of the key parameters foreseen to be investigated in the corresponding test methods referred to in Article 13(3), in this case OECD TG 407. The following key parameter(s) of this test guideline include, among others:

testing of at least three dose levels and a concurrent control

1. at least 5 female and 5 male animals should be used at each dose level (including control group)
2. dosing of the Substance daily for a period of 28 days until the scheduled termination of the study

The study i) you have provided was conducted with less than three dose levels.

Concerning study i) you have not reported the number of animals per sex per dose.

The studies i) and ii) have an exposure duration of 10 days for both studies.

Furthermore, the studies i) and ii) you submitted were performed with dermal administration. However, ECHA considers that the dermal route is not (the most) appropriate for this substance, because the physicochemical and toxicological properties do not suggest potential for a significant rate of absorption through the skin.

Therefore, these studies have no reliable coverage of OECD TG 407's key parameters.

Based on the above, the information you provided does not fulfil the information requirement.

Column 2 of Annex VIII, Section 8.6.1. provides that an experimental study for this endpoint is not needed if a reliable sub-chronic (90 days) or chronic toxicity study is available.

The present decision requests to generate and submit a reliable sub-chronic toxicity study (90 days) (see Section B.1). According to Column 2 of Annex VIII, Section 8.6.1., and to prevent unnecessary animal testing, a short term toxicity study (28 days) does not therefore need to be conducted.

Because you still must comply with the information requirement in Annex VIII, Section 8.6.1., you are requested to submit a justification for the adaptation provided in Column 2 of that provision.

3. Screening study for reproductive/developmental toxicity

A Screening for reproductive/developmental toxicity study (test method: EU B.63/OECD TG 421 or EU B.64/OECD TG 422) is a standard information requirement under Annex VIII to REACH, if there is no evidence from analogue substances, QSAR or *in vitro* methods that the Substance may be a developmental toxicant.

In the IUCLID section 7.8.1., you have not provided any study that meets this information requirement. Instead you have provided the following adaptation: "*For 1,1,3,3-tetrabutyl urea there are no studies available. In a sub-acute study with dermal dosing of male rabbits, apart from weight loss and skin irritation no other effects were reported. Also in a developmental toxicity study (see section 7.8.2) an examination of different tissues organs gave no indications for adverse effects. Therefore, at present there is no need for further testing on reproductive toxicity*."

We have assessed this information and identified the following issue(s):

You have not provided a legal basis for that adaptation and it is unclear to which adaptation you are referring to. We also note that the information of sub-acute toxicity study is a separate information requirement under REACH and does not correspond (and does not meet the requirement for) a reproductive/developmental study, because it does not include a reproductive cycle. You may have submitted an adaptation based on the developmental toxicity study under Section 8.7.1, Column 2, fourth indent of Annex VIII. That study is, however, rejected, as explained in chapter B.2.

Based on the above, the information you provided do not fulfil the information requirement.

A study according to the test method EU B.63/OECD TG 421 or EU B.64/OECD TG 422 must be performed in rats with oral[2] administration of the Substance.

[2] ECHA Guidance R.7a, Section R.7.6.2.3.2.

4. Long-term toxicity testing on aquatic invertebrates

Long-term aquatic toxicity testing as described in Annex IX must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further effects on aquatic organisms (Annex VIII, Section 9.1.3., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further investigation on long-term toxicity testing on aquatic invertebrates (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.). This is the case if the Substance itself or any of its constituent or impurity present in concentration ≥ 0.1% (w/w) or relevant transformation/degradation product meets the following criteria:

- it is potentially persistent or very persistent (P/vP) as it is not readily biodegradable (i.e. <60/70% degradation in an OECD 301 or OECD 310 test), and
- it is potentially bioaccumulative or very bioaccumulative (B/vB) as:
  - it has a high potential to partition to lipid storage (*e.g.* log K_{ow} > 4.5), or
  - it has a high potential for bioaccumulation in air-breathing organisms (log K_{ow} >2 and log K_{oa} >5).

Your registration dossier provides the following:

- The Substance is not readily biodegradable (0.2% and 1.3% degradation after 28 days for test concentrations of 100 mg/L and 20 mg/L respectively, in OECD TG 301F);
- The Substance has a high potential to partition to lipid storage (Log K_{ow} of 6.2 based on OECD TG 117).

Furthermore, the Substance has a high potential for bioaccumulation in air-breathing organisms (Log K_{ow} >2 and K_{oa} >>5 (as predicted from model KOAWIN v1.10).

The information in your dossier is currently incomplete and therefore:

- it is not possible to conclude on the persistence of the Substance (see Appendices A.6 – A.8 and B.5 – B.8 of this decision), and
- it is not possible to conclude on the bioaccumulation of the Substance (see Appendices A.10 and B.9 of this decision), and
- it is not possible to conclude on the toxicity of the Substance (see also Appendices A.1, A.3, A.5, B.1, B.2 and B.4 of this decision).

The information above indicates that the Substance is a potential PBT/vPvB substance.

Therefore, the chemical safety assessment (CSA) indicates the need for further investigation on long-term toxicity testing on aquatic invertebrates.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.3.

5. Long-term toxicity testing on fish

Long-term aquatic toxicity testing as described in Annex IX must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further effects on aquatic organisms (Annex VIII, Section 9.1.3., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further investigation on long-term toxicity testing on fish (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance.

Therefore, the chemical safety assessment (CSA) indicates the need for further investigation on long-term toxicity testing on fish.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.4.

6. Simulation testing on ultimate degradation in surface water

Further degradation testing must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further the degradation of the substance (Annex VIII, Section 9.2., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further degradation investigation (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance.

Therefore, the chemical safety assessment (CSA) indicates the need for further investigation on degradation in surface water.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.5.

7. Soil simulation testing

Further degradation testing must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further the degradation of the substance (Annex VIII, Section 9.2., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further degradation investigation (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance.

The Substance has a high partition coefficient (log Kow 6.2) and high adsorption coefficient (Koc of 9441), indicating a high potential to adsorb to soil.

Therefore, the chemical safety assessment (CSA) indicates the need for further degradation investigation. Based on the adsorptive properties of the Substance, soil represents a relevant environmental compartment.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.6.

8. Sediment simulation testing

Further degradation testing must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further the degradation of the substance (Annex VIII, Section 9.2., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further degradation investigation (Annex I, Section 4; Annex XIII,

Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance.

The Substance has a high partition coefficient (log Kow 6.2) and high adsorption coefficient (Koc of 9441), indicating a high potential to adsorb to sediment.

Therefore, the chemical safety assessment (CSA) indicates the need for further degradation investigation. Based on the adsorptive properties of the Substance, sediment represents a relevant environmental compartment.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.7.

9. Identification of degradation products

Further degradation testing must be considered if the chemical safety assessment (CSA) according to Annex I indicates the need to investigate further the degradation of the substance (Annex VIII, Section 9.2., Column 2).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further degradation investigation (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance. Therefore, the chemical safety assessment (CSA) indicates the need for further degradation investigation.

You have not provided information on the identity of transformation/degradation products for the Substance.

On this basis, the information requirement is not fulfilled.

The examination of the available information or adaptations, as well as further information on the selection of the approach to generate this information are addressed in Appendix B.8.

10. Bioaccumulation in aquatic species

Bioaccumulation in aquatic species is required for the purpose of PBT/vPvB assessment (Annex I, Sections 0.6.1 and 4 to REACH).

This information requirement is triggered in case the chemical safety assessment (CSA) indicates the need for further investigation on bioaccumulation in aquatic species (Annex I, Section 4; Annex XIII, Section 2.1), such as if the substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4.).

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance.

Therefore, the chemical safety assessment (CSA) indicates the need for further investigation on bioaccumulation in aquatic species.

The examination of the available information or adaptations, as well as the selection of the requested test and the test design are addressed in Appendix B.9.

Appendix B: Reasons to request information required under Annex IX of REACH

1. Sub-chronic toxicity study (90-day), oral route

A Sub-chronic toxicity study (90 day) is a standard information requirement under Annex IX to REACH.

You have provided the following studies in your dossier:

i. As a supporting non-guideline study, short-term repeated dose toxicity study (10 days), in rabbits via dermal route, with the Substance, made in 1979, reliability 4, no GLP,

ii. As a key study, a prenatal developmental toxicity study, OECD TG 414 with the Substance was provided, in rats, via dermal route, made in 1980, reliability 2, no GLP.

You have provided adaptations for oral and inhalation sub-chronic toxicity studies, and referred to availability of data on repeated dose toxicity via dermal route.

We have assessed this information and identified the following issues:

Although you do not explicitly claim an adaptation, ECHA understands that the information provided was submitted in order to meet the required information by way of adaptation under Annex, Section XI 1.1.2. This adaptation rule enables registrants to claim that the data from experiments not carried out according to GLP or the test methods referred to in Article 13(3) can be considered equivalent to data generated by those test methods where a number of cumulative conditions are met. This includes, in particular, adequate and reliable coverage of the key parameters foreseen to be investigated in the corresponding test methods referred to in Article 13(3), in this case OECD TG 408. The following key parameter(s) of this test guideline include, among others:

3. testing of at least three dose levels and a concurrent control
4. At least 10 female and 10 male animals should be used at each dose level (including control group)
5. dosing of the Substance daily for a period of 90 days until the scheduled termination of the study
6. Clinical observations, ophthalmological examination, hematology, clinical biochemistry, gross necropsy and histopathology

The study i) you have provided was conducted with less than three dose levels.

Concerning study i) you have not reported the number of animals per sex per dose.

The studies i) and ii) have an exposure duration of 10 days for both studies.

The studies i) and ii) have the following key parameters missing: ophthalmological examination, hematology, clinical biochemistry, gross necropsy and histopathology.

Furthermore, the studies i) and ii) you submitted were performed with dermal administration. However, ECHA considers that the dermal route is not (the most) appropriate for this substance, because the physicochemical and toxicological properties do not suggest potential for a significant rate of absorption through the skin.

Therefore, these studies have no reliable coverage of OECD TG 408's key parameters.

Based on the above, the information you provided do not fulfil the information requirement.

Referring to the criteria provided in Annex IX, Section 8.6.2, Column 2, the oral route is the most appropriate route of administration to investigate repeated dose toxicity, because the

Substance is a liquid of very low vapour pressure (0.00019 hPa at 20°C) and no uses with spray application are reported that could potentially lead to aerosols of inhalable size.

Therefore the sub-chronic toxicity study must be performed according to the OECD TG 408, in rats and with oral administration of the Substance.

2. Pre-natal developmental toxicity study

A Pre-natal developmental toxicity (PNDT) study (OECD TG 414) in one species is a standard information requirement under Annex IX to REACH.

You have provided the following study

- As a key study, prenatal developmental toxicity study, OECD TG 414 with the Substance was provided, in rats via dermal route, made in 1980, reliability 2, no GLP

We have assessed this information and identified the following issue(s):

Although you do not explicitly claim an adaptation, ECHA understands that the information provided was submitted in order to meet the required information by way of adaptation under Annex XI, Section 1.1.2. This adaptation rule enables registrants to claim that the data from experiments not carried out according to GLP or the test methods referred to in Article 13(3) can be considered equivalent to data generated by those test methods where a number of cumulative conditions are met. This includes, in particular, adequate and reliable coverage of the key parameters foreseen to be investigated in the corresponding test methods referred to in Article 13(3), in this case OECD TG 414. This include e.g.

- dosing of the Substance from implantation until the day prior to scheduled caesarean section
- exposure duration is not from implantation until the day prior to scheduled caesarean section as required in OECD TG 414

In the study you provided, the rats were treated once daily from days 6 to 15 of gestation, whereas according to the OECD test guideline, the chemical should be administered from the implantation until one day before delivery, which is day 21-22. .

Furthermore, the study you submitted was performed with dermal administration. According to OECD TG 414, the test chemical or vehicle is usually administered orally by intubation. If another route of administration is used, the tester should provide justification and reasoning for its selection. ECHA considers that the dermal route is not (the most) appropriate for this substance, because the physicochemical and toxicological properties do not suggest potential for a significant rate of absorption through the skin.

Therefore, these studies have no reliable coverage of OECD TG 414's key parameters.

Based on the above, the information you provided does not fulfil the information requirement.

A PNDT study according to the test method OECD TG 414 must be performed in rat or rabbit as preferred species with oral[3] administration of the Substance.

3. Long-term toxicity testing on aquatic invertebrates

Long-term toxicity testing on aquatic invertebrates is an information requirement under Annex IX to REACH (Section 9.1.5.).

You have provided a justification to omit the study which you consider to be based on Annex IX, Section 9.1., Column 2. In support of your adaptation, you provided the following

[3] ECHA Guidance R.7a, Section R.7.6.2.3.2.

justification:

"*In Annex IX of Regulation (EC) No 1907/2006, it is laid down that long-term toxicity testing on aquatic organisms shall be considered by the registrant if the chemical safety assessment indicates the need to investigate further the effects on fish* (sic)*. According to Annex I of this regulation, the chemical safety assessment triggers further action when the substance or the preparation meets the criteria for classification as dangerous according to Directive 67/548/EEC or Directive 1999/45/EC or is assessed to be a PBT or vPvB. The hazard assessment of tetrabutyl urea reveals neither a need to classify the substance as dangerous for the environment, nor is it a PBT or vPvB substance. The use pattern and the developed exposure scenarios of tetrabutyl urea (see section 3.5) indicate, that direct and/or indirect exposure of surface waters and sediment is unlikely to occur. Furthermore, the environmental risk assessment conducted and documented in the chemical safety report clearly shows, that no considerable risk of organisms in surface waters is to be expected. Therefore, with respect to animal welfare, the performance of a long-term study on invertebrates is assumed to be not justifiable*".

We have assessed this information and identified the following issue.

Annex IX, Section 9.1., Column 2 does not allow omitting the need to submit information on long-term toxicity to aquatic invertebrates under Column 1. It must be understood as a trigger for providing further information on aquatic invertebrates if the chemical safety assessment according to Annex I indicates the need (Decision of the Board of Appeal in case A-011-2018).

Therefore, your adaptation is rejected and the information requirement is not fulfilled.

In your comments to the draft decision you indicate that you plan to perform long-term toxicity testing on aquatic invertebrates after the result of the bioaccumulation study requested (A.10 and B.9) is available. You indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration.

ECHA observes that you did not notify a cease of manufacture or import by the end of the decision-making process, and that therefore you are bound by this decision (see section 5.4. of ECHA's Practical Guide "How to act in Dossier Evaluation).

4. Long-term toxicity testing on fish

Long-term toxicity testing on aquatic invertebrates is an information requirement under Annex IX to REACH (Section 9.1.5.).

You have provided a justification to omit the study which you consider to be based on Annex IX, Section 9.1., Column 2. In support of your adaptation, you provided the following justification:

"*In Annex IX of Regulation (EC) No 1907/2006, it is laid down that long-term toxicity testing on aquatic organisms shall be considered by the registrant if the chemical safety assessment indicates the need to investigate further the effects on fish. According to Annex I of this regulation, the chemical safety assessment triggers further action when the substance or the preparation meets the criteria for classification as dangerous according to Directive 67/548/EEC or Directive 1999/45/EC or is assessed to be a PBT or vPvB. The hazard assessment of tetrabutyl urea reveals neither a need to classify the substance as dangerous for the environment, nor is it a PBT or vPvB substance. The use pattern and the developed exposure scenarios of tetrabutyl urea (see section 3.5) indicate, that direct and/or indirect exposure of surface waters and sediment is unlikely to occur. Furthermore, the environmental risk assessment conducted and documented in the chemical safety report clearly shows, that*

no considerable risk of organisms in surface waters is to be expected. Therefore, with respect to animal welfare, the performance of a chronic fish study is assumed to be not justifiable".

We have assessed this information and identified the following issue.

Annex IX, Section 9.1., Column 2 does not allow omitting the need to submit information on long-term toxicity to fish under Column 1. It must be understood as a trigger for providing further information on fish if the chemical safety assessment according to Annex I indicates the need (Decision of the Board of Appeal in case A-011-2018).

Therefore, your adaptation is rejected and the information requirement is not fulfilled.

In your comments to the draft decision you indicate that you plan to perform long-term toxicity testing on fish after the result of the bioaccumulation study requested (A.10 and B.9) is available. However, you also indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration.

As already noted on this procedural aspect under B.3 above, as you did not notify ECHA of a cease of manufacture in REACH-IT before the adoption of the final evaluation decision, you are bound by this decision.

5. Simulation testing on ultimate degradation in surface water

Simulation testing on ultimate degradation in surface water is an information requirement under Annex IX to REACH (Section 9.2.1.2.).

You have provided an adaptation under Annex IX, Section 9.2., Column 2 with the following justification:

"*According to REACH Regulation (Annex IX, 9.2), a study on biodegradation in water and sediment does not need to be done if direct or indirect exposure of these compartments is not to be expected. Based on the use pattern and the developed exposure scenarios of tetrabutyl urea (see section 3.5 and CSR), direct and/or indirect exposure of surface waters and sediment is unlikely to occur*".

We have assessed this information and identified the following issue.

Under Section 9.2., Column 2 of Annex IX to REACH, the study may be omitted if the chemical safety assessment (CSA) does not indicate the need for further biotic degradation testing. The CSA does indicate such need (Annex I, Section 4; Annex XIII, Section 2.1) if, for instance, the Substance is a potential PBT/vPvB substance (ECHA Guidance R.11.4).

Annex XIII, Section 2.1 indicates that information for the PBT/vPvB assessment may be omitted if the process and use conditions of the Substance meet the conditions as specified in Section 3.2(b) or (c) of Annex XI.

As already explained under Appendix A.4, the Substance meets the screening criteria for P/vP (not readily biodegradable) and B/vB (measured log Kow of 6.2), therefore the Substance is a potential PBT/vPvB substance.

According to the CSR, the Substance is not incorporated in articles, therefore Section 3.2(c) of Annex XI is not applicable.

Under Section 3.2(b) of Annex XI, the information for the PBT/vPvB assessment may be omitted if the registrant demonstrates and documents that the process and use conditions of

the substance meet strictly controlled conditions for all relevant scenarios and throughout the life cycle of the substance.

Strictly controlled conditions are defined in Article 18(4)(a) to (f) as follows:

a. the substance is rigorously contained by technical means during its whole lifecycle including manufacture, purification, cleaning and maintenance of equipment, sampling, analysis, loading and unloading of equipment or vessels, waste disposal or purification and storage;
b. procedural and control technologies must be used that minimise emission and any resulting exposure;
c. only properly trained and authorised personnel handle the substance;
d. in the case of cleaning and maintenance works, special procedures such as purging and washing are applied before the system is opened and entered;
e. in cases of accident and where waste is generated, procedural and/or control technologies are used to minimise emissions and the resulting exposure during purification or cleaning and maintenance procedures;
f. substance-handling procedures are well documented and strictly supervised by the site operator.

In your CSR, you indicate the following:

- the Substance is used as solvent in closed systems;
- the Substance is usually recycled after use;
- filter material etc. is incinerated.

You conclude that, "*overall releases into the environment are negligible*".

However, you have not demonstrated or documented that strictly controlled conditions, as defined by the different points listed in Article 18(4)(a) to (f), are met for the Substance. Your CSR shows that releases to the environment are possible (e.g. in exposure scenario 2, use as solvent). Therefore, you have not demonstrated or documented that the conditions specified in Section 3.2(b) or (c) of Annex XI are met.

In your comments to the draft decision you indicate that you plan to assess the persistence of the Substance at the last step of the PBT/vPvB assessment. However, you also indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration. Furthermore, based on exposure consideration, you claim that simulation testing should be performed in sediment, as you expect sediment to be a compartment of higher concern compared to water or soil. You indicate that you will refine your exposure assessment by collecting more information from the downstream users of the Substance, but you also acknowledge that strictly controlled conditions cannot be demonstrated.

ECHA notes the following:

- persistence should generally be assessed first for the PBT/vPvB assessment (see Appendix D);
- as explained under B.3 above, you did not notify a cease of manufacture in REACH-IT before the adoption of the final evaluation decision and therefore you are bound by this decision;
- as explained above, exposure considerations cannot be invoked to omit the test for the purpose of the PBT/vPvB assessment if strictly controlled conditions are not demonstrated.

Therefore, the information cannot be omitted for the purpose of the PBT/vPvB assessment, your adaptation is rejected and the information requirement is not fulfilled.

Study design

Simulation degradation studies must include two types of investigations (ECHA Guidance R.7.9.4.1.):

1) a degradation pathway study where transformation/degradation products are quantified and, if relevant, are identified, and
2) a kinetic study where the degradation rate constants (and degradation half-lives) of the parent substance and of relevant transformation/degradation products are experimentally determined.

You must perform the test, by following the pelagic test option with natural surface water containing approximately 15 mg dw/L of suspended solids (acceptable concentration between 10 and 20 mg dw/L) (ECHA Guidance R.11.4.1.1.3.).

The required test temperature is 12°C, which corresponds to the average environmental temperature for the EU (ECHA Guidance R.16, Table R.16-8) and is in line with the applicable test conditions of the OECD TG 309.

As specified in ECHA Guidance R.7.9.4.1., the organic carbon (OC) concentration in surface water simulation tests is typically 2 to 3 orders of magnitude higher than the test substance concentration and the formation of non-extractable residues (NERs) may be significant in surface water tests. Therefore, non-extractable residues (NER) must be quantified. The reporting of results must include a scientific justification of the used extraction procedures and solvents. By default, total NER is regarded as non-degraded Substance. However, if reasonably justified and analytically demonstrated a certain part of NER may be differentiated and quantified as irreversibly bound or as degraded to biogenic NER, such fractions could be regarded as removed when calculating the degradation half-life(s) (ECHA Guidance R.11.4.1.1.3.). Further recommendations may be found in the background note on options to address non-extractable residues in regulatory persistence assessment available on the ECHA website.

Relevant transformation/degradation products are at least those detected at ≥ 10% of the applied dose at any sampling time or those that are continuously increasing during the study even if their concentrations do not exceed 10% of the applied dose, as this may indicate persistence (OECD TG 309; ECHA Guidance R.11.4.1.).

6. Soil simulation testing

Soil simulation testing is an information requirement under Annex IX to REACH (Section 9.2.1.3.) for substances with a high potential for adsorption to soil.

The Substance has a high partition coefficient (log Kow 6.2) and high adsorption coefficient (Koc of 9441), and therefore has high potential for adsorption to soil.

You have provided an adaptation under Annex IX, Section 9.2., Column 2 with the following justification:

"*According to REACH Regulation (Annex IX, 9.2), a study on biodegradation in soil does not need to be done if direct or indirect exposure of this compartments is not to be expected. Based on the use pattern and the developed exposure scenarios of tetrabutyl urea (see section 3.5 and CSR), direct and/or indirect exposure of soil is unlikely to occur*".

We have assessed this information and identified the following issue.

Under Column 2 of Section 9.2 of Annex IX, the information requirement of Annex IX 9.2.1.3. may be omitted if exposure of soil is unlikely.The information is required for the purpose of the PBT/vPvB assessment if the substance is a potential PBT/vPvB substance, unless the Substance is already treated "as if it is a PBT or vPvB" (ECHA Guidance R.11, Sections

R.11.3.3.3 and R.11.3.3.4). Annex XIII, Section 2.1 indicates that information for the PBT/vPvB assessment may be omitted if the process and use conditions of the Substance meet the conditions as specified in Section 3.2(b) or (c) of Annex XI.

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance. As already explained under Appendix B.5, you have not demonstrated or documented that the conditions specified in Section 3.2(b) or (c) of Annex XI are met.

In your comments to the draft decision you indicate that you plan to assess the persistence of the Substance at the last step of the PBT/vPvB assessment. However, you also indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration. Furthermore, based on exposure consideration, you claim that simulation testing should be performed in sediment as you expect sediment to be a compartment of higher concern compared to water or soil. You indicate that you will refine your exposure assessment by collecting more information from the downstream users of the Substance, but you also acknowledge that strictly controlled conditions cannot be demonstrated.

ECHA notes the following:

- persistence should generally be assessed first for the PBT/vPvB assessment (see Appendix D);
- as explained under B.3 above, you did not notify a cease of manufacture in REACH-IT before the adoption of the final evaluation decision and therefore you are bound by this decision;
- as explained above, exposure considerations cannot be invoked to omit the test for the purpose of the PBT/vPvB assessment if strictly controlled conditions are not demonstrated.

Therefore, the information cannot be omitted for the purpose of the PBT/vPvB assessment, your adaptation is rejected and the information requirement is not fulfilled.

Study design

Simulation degradation studies must include two types of investigations (ECHA Guidance R.7.9.4.1):

1) a degradation pathway study where transformation/degradation products are quantified and, if relevant, are identified, and
2) a kinetic study where the degradation rate constants (and degradation half-lives) of the parent substance and of relevant transformation/degradation products are experimentally determined.

In accordance with the specifications of OECD TG 307, you must perform the test using at least four soils representing a range of relevant soils (*i.e.* varying in their organic content, pH, clay content and microbial biomass).

The required test temperature is 12°C, which corresponds to the average environmental temperature for the EU (ECHA Guidance R.16, Table R.16-8) and is in line with the applicable test conditions of the OECD TG 307.

In accordance with the specifications of OECD TG 307, non-extractable residues (NER) must be quantified. The reporting of results must include a scientific justification of the used extraction procedures and solvents (ECHA Guidance R.7.9.4.1.). By default, total NER is regarded as non-degraded Substance. However, if reasonably justified and analytically demonstrated a certain part of NER may be differentiated and quantified as irreversibly bound or as degraded to biogenic NER, such fractions could be regarded as removed when calculating the degradation half-life(s) (ECHA Guidance R.11.4.1.1.3.). Further recommendations may

be found in the background note on options to address non-extractable residues in regulatory persistence assessment available on the ECHA website.

Relevant transformation/degradation products are at least those detected at ≥ 10% of the applied dose at any sampling time or those that are continuously increasing during the study even if their concentrations do not exceed 10% of the applied dose, as this may indicate persistence (OECD TG 307; ECHA Guidance R.11.4.1.).

7. Sediment simulation testing

Sediment simulation testing is an information requirement under Annex IX to REACH (Section 9.2.1.4.) for substances with a high potential for adsorption to sediment.

The Substance has a high partition coefficient (log Kow 6.2) and high adsorption coefficient (Koc of 9441), and therefore has high potential for adsorption to sediment.

You have provided an adaptation under Annex IX, Section 9.2., Column 2 with the following justification:

" *According to REACH Regulation (Annex IX, 9.2), a study on biodegradation in water and sediment does not need to be done if direct or indirect exposure of these compartments is not to be expected. Based on the use pattern and the developed exposure scenarios of tetrabutyl urea (see section 3.5 and CSR), direct and/or indirect exposure of surface waters and sediment is unlikely to occur*".

We have assessed this information and identified the following issue.

Under Column 2 of Section 9.2 of Annex IX, the information requirement of Annex IX 9.2.1.4. may be omitted if exposure of sediment is unlikely. However, the information is still required for the purpose of the PBT/vPvB assessment if the substance is a potential PBT/vPvB substance, unless the Substance is already treated "as if it is a PBT or vPvB" (ECHA Guidance R.11, Sections R.11.3.3.3 and R.11.3.3.4). Annex XIII, Section 2.1 indicates that information for the PBT/vPvB assessment may be omitted if the process and use conditions of the Substance meet the conditions as specified in Section 3.2(b) or (c) of Annex XI.

As already explained under Appendix A.4, the Substance is a potential PBT/vPvB substance. As already explained under Appendix B.5, you have not demonstrated or documented that the conditions specified in Section 3.2(b) or (c) of Annex XI are met.

In your comments to the draft decision you indicate that you plan to assess the persistence of the Substance at the last step of the PBT/vPvB assessment. However, you also indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration. You further indicate that you will refine your exposure assessment by collecting more information from the downstream users of the Substance, but you also acknowledge that strictly controlled conditions cannot be demonstrated.

ECHA notes the following:

- persistence should generally be assessed first for the PBT/vPvB assessment (see Appendix D);
- as explained under B.3 above, you did not notify a cease of manufacture in REACH-IT before the adoption of the final evaluation decision and therefore you are bound by this decision;
- as explained above, exposure considerations cannot be invoked to omit the test for the purpose of the PBT/vPvB assessment if strictly controlled conditions are not demonstrated.

Therefore, the information cannot be omitted for the purpose of the PBT/vPvB assessment, your adaptation is rejected and the information requirement is not fulfilled.

Study design

Simulation degradation studies must include two types of investigations (ECHA Guidance R.7.9.4.1.):

1) a degradation pathway study where transformation/degradation products are quantified and, if relevant, are identified, and
2) a kinetic study where the degradation rate constants (and degradation half-lives) of the parent substance and of relevant transformation/degradation products are experimentally determined.

In accordance with the specifications of OECD TG 308, you must perform the test using two sediments. One sediment should have a high organic carbon content (2.5-7.5%) and a fine texture, the other sediment should have a low organic carbon content (0.5-2.5%) and a coarse texture. If the Substance may also reach marine waters, at least one of the water-sediment systems should be of marine origin.

The required test temperature is 12°C, which corresponds to the average environmental temperature for the EU (ECHA Guidance R.16, Table R.16-8) and is in line with the applicable test conditions of the OECD TG 308.

In accordance with the specifications of OECD TG 308, non-extractable residues (NER) must be quantified. The reporting of results must include a scientific justification of the used extraction procedures and solvents (ECHA Guidance R.7.9.4.1.). By default, total NER is regarded as non-degraded Substance. However, if reasonably justified and analytically demonstrated a certain part of NER may be differentiated and quantified as irreversibly bound or as degraded to biogenic NER, such fractions could be regarded as removed when calculating the degradation half-life(s) (ECHA Guidance R.11.4.1.1.3.). Further recommendations may be found in the background note on options to address non-extractable residues in regulatory persistence assessment available on the ECHA website.

Relevant transformation/degradation products are at least those detected at ≥ 10% of the applied dose at any sampling time or those that are continuously increasing during the study even if their concentrations do not exceed 10% of the applied dose, as this may indicate persistence (OECD TG 308; ECHA Guidance R.11.4.1.).

8. Identification of degradation products

Identification of degradation products is an information requirement under Annex IX to REACH (Section 9.2.3.).

You have provided no information on the identity of transformation/degradation products for the Substance.

In your comments to the draft decision you indicate that you plan to assess the persistence of the Substance at the last step of the PBT/vPvB assessment. However, you also indicate that if the Substance is confirmed to meet the B criterion then you may decide to decline from the registration. You further indicate that you will refine your exposure assessment by collecting more information from the downstream users of the Substance, but you also acknowledge that strictly controlled conditions cannot be demonstrated.

ECHA notes the following:

- persistence should generally be assessed first for the PBT/vPvB assessment (see Appendix D);

- as explained under B.3 above, you did not notify a cease of manufacture in REACH-IT before the adoption of the final evaluation decision and therefore you are bound by this decision;
- as explained above, exposure considerations cannot be invoked to omit the test for the purpose of the PBT/vPvB assessment if strictly controlled conditions are not demonstrated.

Therefore, this information requirement is not met.

This information is required for the purpose of the PBT/vPvB assessment (Annex I, Section 4) and the risk assessment (Annex I, Section 6) of the Substance.

Study design

Regarding the selection of appropriate and suitable test method(s), the method(s) will have to be substance-specific. Identity, stability, behaviour, and molar quantity of the degradation/transformation products relative to the Substance must be evaluated and reported, when analytically possible. In addition, degradation half-life, log K_{ow} and potential toxicity of the transformation/degradation may need to be investigated. You may obtain this information from the degradation studies requested in Appendices A.5- A.7 and B.5- B.7 or by some other measure. If any other method is used for the identification of the transformation/degradation products, you must provide a scientifically valid justification for the chosen method.

To determine the degradation rate of the Substance, the studies requested in Appendices A.5- A.7 and B.5- B.7 must be conducted at 12°C and at test material concentrations reflecting realistic assumptions. However, to overcome potential analytical limitations with the identification and quantification of major transformation/degradation products, you may consider running a parallel test at higher temperature (but within the frame provided by the test guideline, *e.g.* 20°C) and at higher concentrations.

9. Bioaccumulation in aquatic species

Bioaccumulation in aquatic species is an information requirement under Annex IX to REACH (Section 9.3.2.).

You have provided the following information:

i. a QSAR prediction using model BCFBAF v3.01, regression based method (in software EPI Suite v4.11,
ii. a QSAR prediction using model BCFBAF v3.01, Arnot-Gobas method (in software EPI Suite v4.11.

We have assessed this information and identified the following issues:

a) The Substance is outside the applicability domain of the models

Under ECHA Guidance R.6.1.5.3., a prediction is within the applicability domain of a model, when, among others, the Substance falls within descriptor, structural, mechanistic and metabolic domain.

Your registration dossier provides predictions from model BCFBAF v3.01 (in software EPI Suite v4.11).

The Substance is an aliphatic urea derivative.

As the training sets or the validation sets for model BCFBAF v3.01 do not contain aliphatic urea derivatives, the Substance is not in the structural applicability domain of the model.

Therefore the Substance is outside the applicability domain of this model.

b) *Results obtained from (Q)SAR models are only regarded as screening information (Annex XIII, Section 3.1.)*

Under Section 1.3., first paragraph, third indent of Annex XI to REACH, a study may be omitted if QSAR results are adequate for the purpose of classification and labelling and/or risk assessment, including PBT assessment (Annex I, Section 4, which refers to Annex XIII).

Section 2.1. of Annex XIII requires that you must generate 'assessment information' (as described in Section 3.2 of Annex XIII), such as a bioaccumulation study, if the results from screening information (as described in Section 3.1 of Annex XIII) indicate that the Substance may have PBT or vPvB properties. Section 2.1. of Annex XIII further specifies that assessment information does not have to be generated for the purpose of the PBT/vPvB assessment only if screening information does not indicate potential P or B properties.

Therefore, as long as a piece of screening information indicates that the Substance could potentially be persistent (P) and bioaccumulative (B), then assessment information needs to be generated.

This is the case if the Substance, a constituent, an impurity or a transformation/degradation product meets the following screening criteria (see ECHA Guidance R.11, Section R.11.4):

- The Substance is potentially bioaccumulative or very bioaccumulative:
  - e.g. log Kow > 4.5 or potential for bioaccumulation in air-breathing organisms (log Kow >2 and log Koa >5)
- The Substance is potentially persistent or very persistent:
  - e.g. the Substance not readily biodegradable according to OECD 301 or OECD 310 test(s)

For the B/vB assessment, results from a bioconcentration or bioaccumulation study in aquatic species constitutes assessment information for B or vB properties (Section 3.2.2. of Annex XIII of REACH). However, QSAR predictions are not mentioned as possible assessment information for the PBT/vPvB assessment. (Q)SAR models may however be used, but only together with other information in a Weight-of-Evidence approach (see ECHA Guidance R.11, Section R.11.4.1.2.10).

Screening information provided in your dossier indicates that:
- The Substance is not readily biodegradable (0.2% and 1.3% degradation after 28 days for test concentrations of 100 mg/L and 20 mg/L respectively, in OECD TG 301F);
- The Substance has a high potential to partition to lipid storage (Log K_{ow} of 6.2 based on OECD TG 117).

Furthermore, the Substance has a high potential for bioaccumulation in air-breathing organisms (Log K_{ow} >2 and K_{oa} >>5 (as predicted from model KOAWIN v1.10).

You have reported BCF values of 112 and 166, predicted for the Substance by the BCFBAF v3.01 model with the regression based method and the Arnot-Gobas method, respectively. Based on these QSAR results, you conclude that the Substance does not meet the P/vP criteria. You have not provided additional information to support this conclusion.
The experimental log Kow value of 6.2 is a valid piece of screening information which indicates that the Substance could be bioaccumulative or very bioaccumulative.

Similarly, the Substance is not readily biodegradable, indicating that the Substance could be in addition persistent or very persistent.

The BCF values of 112 and 166 are regarded as 'screening information' (Section 3.1, Annex XIII of REACH), not as 'assessment information' (Section 3.2, Annex XIII of REACH) as it is based on a QSAR prediction.

The information you have provided cannot reverse the conclusion that the Substance may have PBT/vPvB properties, since there is already valid screening information (log Kow of 6.2 and the absence of degradation observed in the ready biodegradability test) to establish this.

Therefore, the provided information indicates that the Substance is potentially PBT/vPvB, and further information on bioaccumulation is required for the PBT/vPvB assessment.

c) Conclusion

As explained above, the provided QSAR results does not provide a robust approach to conclude that the Substance does not meet the P/vP criteria and thus are not adequate for PBT assessment. Therefore, you adaptation is rejected and the information requirement is not fulfilled.

In your comments to the draft decision you agree to address this information requirement as part of the PBT/vPvB assessment of the Substance.

Study design

Bioaccumulation in fish: aqueous and dietary exposure (Method EU C.13 / OECD TG 305) is the preferred test to investigate bioaccumulation (ECHA Guidance R.7.10.3.1.). Exposure via the aqueous route (OECD TG 305-I) must be conducted unless it can be demonstrated that:

- a stable and fully dissolved concentration of the test substance in water cannot be maintained within ± 20% of the mean measured value, and/or
- the highest achievable concentration is less than an order of magnitude above the limit of quantification (LoQ) of a sensitive analytical method.

This test set-up is preferred as it allows for a direct comparison with the B and vB criteria of Annex XIII of REACH.

You may only conduct the study using the dietary exposure route (OECD 305-III) if you justify and document that testing through aquatic exposure is not technically possible as indicated above. You must then estimate the corresponding BCF value from the dietary test data according to Annex 8 of the OECD 305 TG and OECD Guidance Document on Aspects of OECD TG 305 on Fish Bioaccumulation (ENV/JM/MONO(2017)16).

Appendix C: Requirements to fulfil when conducting and reporting new tests for REACH purposes

A. Test methods, GLP requirements and reporting

1. Under Article 13(3) of REACH, all new data generated as a result of this decision must be conducted according to the test methods laid down in a European Commission Regulation or to international test methods recognised by the Commission or ECHA as being appropriate.

2. Under Article 13(4) of REACH, ecotoxicological and toxicological tests and analyses must be carried out according to the GLP principles (Directive 2004/10/EC) or other international standards recognised by the Commission or ECHA.

3. Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries[4].

B. Test material

Before generating new data, you must agree within the joint submission on the chemical composition of the material to be tested (Test Material) which must be relevant for all the registrants of the Substance.

1. Selection of the Test material(s)

   The Test Material used to generate the new data must be selected taking into account the following:
   - the variation in compositions reported by all members of the joint submission,
   - the boundary composition(s) of the Substance,
   - the impact of each constituent/ impurity on the test results for the endpoint to be assessed. For example, if a constituent/ impurity of the Substance is known to have an impact on (eco)toxicity, the selected Test Material must contain that constituent/ impurity.

2. Information on the Test Material needed in the updated dossier
   - You must report the composition of the Test Material selected for each study, under the "Test material information" section, for each respective endpoint study record in IUCLID.
   - The reported composition must include all constituents of each Test Material and their concentration values and other parameters relevant for the property to be tested.

This information is needed to assess whether the Test Material is relevant for the Substance and whether it is suitable for use by all members of the joint submission.

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers[5].

[4] https://echa.europa.eu/practical-guides
[5] https://echa.europa.eu/manuals

Appendix D: General recommendations when conducting and reporting new tests for REACH purposes

A. Strategy for the PBT/vPvB assessment

Under Annex XIII, the information must be based on data obtained under conditions relevant for the PBT/vPvB assessment. You must assess the PBT properties of each relevant constituent of the Substance present in concentrations at or above 0.1% (w/w) and of all relevant transformation/degradation products. Alternatively, you would have to justify why you consider these not relevant for the PBT/vPvB assessment.

You are advised to consult ECHA Guidance R.7b (Section R.7.9.), R.7c (Section R.7.10) and R.11 on PBT assessment to determine the sequence of the tests needed to reach the conclusion on PBT/vPvB. The guidance provides advice on 1) integrated testing strategies (ITS) for the P, B and T assessments and 2) the interpretation of results in concluding whether the Substance fulfils the PBT/vPvB criteria of Annex XIII.

In particular, you are advised to first conclude whether the Substance fulfils the Annex XIII criteria for P and vP, and then continue with the assessment for bioaccumulation. When determining the sequence of simulation degradation testing you are advised to consider the intrinsic properties of the Substance, its identified uses and release patterns as these could significantly influence the environmental fate of the Substance. You must revise your PBT assessment when the new information is available.

Appendix E: Procedure

This decision does not prevent ECHA from initiating further compliance checks at a later stage on the registrations present.

ECHA followed the procedure detailed in Articles 50 and 51 of REACH.

The compliance check was initiated on 1 December 2020.

ECHA notified you of the draft decision and invited you to provide comments.

In your comments on the draft decision, you requested an extension of the deadline to provide information from 24 to 36 months from the date of adoption of the decision for the requests B1 and B2. You justify your request by explaining that you intend to consider the information on possible target organs obtained in the screening study for the planning/design of the 90 day study.

However, the deadline in the draft decision already takes sequential testing into account, and it also includes time for planning and coordination of the requested studies.

ECHA took into account your comments and did not amend the request(s) or the deadline.

ECHA notified the draft decision to the competent authorities of the Member States for proposals for amendment.

As no amendments were proposed, ECHA took the decision according to Article 51(3) of the REACH Regulation.

It is noted that some addressees of the draft decision notified ECHA of a cease of manufacture during the decision-making process. Under Article 50(3) of REACH, if a registrant ceases manufacture upon receipt of the draft decision, the registration will no longer be valid and no further information may be requested from that registrant. The adopted decision is therefore no longer addressed to them.

Appendix F: List of references - ECHA Guidance[6] and other supporting documents

Evaluation of available information
Guidance on information requirements and chemical safety assessment, Chapter R.4 (version 1.1., December 2011), referred to as ECHA Guidance R.4 where relevant.

QSARs, read-across and grouping
Guidance on information requirements and chemical safety assessment, Chapter R.6 (version 1.0, May 2008), referred to as ECHA Guidance R.6 where relevant.

Read-across assessment framework (RAAF, March 2017)[7]

RAAF - considerations on multiconstituent substances and UVCBs (RAAF UVCB, March 2017)[8]

Physical-chemical properties
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Toxicology
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7c (version 3.0, June 2017), referred to as ECHA Guidance R.7c in this decision.

Environmental toxicology and fate
Guidance on information requirements and chemical safety assessment, Chapter R.7a (version 6.0, July 2017), referred to as ECHA Guidance R.7a in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7b (version 4.0, June 2017), referred to as ECHA Guidance R.7b in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.7c (version 3.0, June 2017), referred to as ECHA Guidance R.7c in this decision.

PBT assessment
Guidance on information requirements and chemical safety assessment, Chapter R.11 (version 3.0, June 2017), referred to as ECHA Guidance R.11 in this decision.

Guidance on information requirements and chemical safety assessment, Chapter R.16 (version 3.0, February 2016), referred to as ECHA Guidance R.16 in this decision.

Data sharing
Guidance on data-sharing (version 3.1, January 2017), referred to as ECHA Guidance on data sharing in this decision.

OECD Guidance documents[9]

[6] https://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment
[7] https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across
[8] https://echa.europa.eu/documents/10162/13630/raaf_uvcb_report_en.pdf/3f79684d-07a5-e439-16c3-d2c8da96a316
[9] http://www.oecd.org/chemicalsafety/testing/series-testing-assessment-publications-number.htm

Guidance Document on aqueous–phase aquatic toxicity testing of difficult test chemicals – No 23, referred to as OECD GD 23.

Guidance document on transformation/dissolution of metals and metal compounds in aqueous media – No 29, referred to as OECD GD 29.

Guidance Document on Standardised Test Guidelines for Evaluating Chemicals for Endocrine Disruption – No 150, referred to as OECD GD 150.

Guidance Document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test – No 151, referred to as OECD GD 151.

Appendix G: Addressees of this decision and their corresponding information requirements

You must provide the information requested in this decision for all REACH Annexes applicable to you.

Registrant Name	Registration number	Highest REACH Annex applicable to you
[redacted]	[redacted]	[redacted]

Where applicable, the name of a third party representative (TPR) may be displayed in the list of recipients whereas ECHA will send the decision to the actual registrant.