EUROPEAN CHEMICALS AGENCY

Helsinki, 15 December 2016

Addressee: [redacted]

Decision number: CCH-D-2114346807-40-01/F
Substance name: 3-methylbutan-1-ol
EC number: 204-633-5
CAS number: 123-51-3
Registration number: [redacted]
Submission number: [redacted]
Submission date: 17.07.2013
Registered tonnage band: [redacted]

DECISION ON A COMPLIANCE CHECK

Based on Article 41 of Regulation (EC) No 1907/2006 (the 'REACH Regulation'), ECHA requests you to submit information on

1. **In vitro gene mutation study in bacteria (Annex VII, Section 8.4.1.; test method: Bacterial reverse mutation test, EU B.13/14. / OECD TG 471) with the registered substance;**

2. **Extended one-generation reproductive toxicity study (Annex X, Section 8.7.3.; test method: EU B.56./OECD TG 443) in rats, oral route; with the registered substance specified as follows:**

   - **Ten weeks premating exposure duration for the parental (P0) generation;**
   - **Dose level setting shall aim to induce some toxicity at the highest dose level;**
   - **Cohort 1A (Reproductive toxicity);**
   - **Cohort 1B (Reproductive toxicity) without extension to mate the Cohort 1B animals to produce the F2 generation;**

You may adapt the testing requested above according to the specific rules outlined in Annexes VI to X and/or according to the general rules contained in Annex XI of the REACH Regulation. In order to ensure compliance with the respective information requirement, any such adaptation will need to have a scientific justification, referring and conforming to the appropriate rules in the respective Annex, and an adequate and reliable documentation.

You are required to submit the requested information in an updated registration dossier by **23 December 2019**. You shall also update the chemical safety report, where relevant.

The reasons of this decision are set out in Appendix 1. The procedural history is described in Appendix 2. Advice and further observations are provided in Appendix 3.

Appeal

This decision can be appealed to the Board of Appeal of ECHA within three months of its notification. An appeal, together with the grounds thereof, shall be submitted to ECHA in writing. An appeal has suspensive effect and is subject to a fee. Further details are described under http://echa.europa.eu/regulations/appeals.

Authorised[1] by Ofelia Bercaru, Head of Unit, Evaluation E3

[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 1: Reasons

Pursuant to Articles 10(a)(vi) and/or (vii), 12(1)(e) and 13(4) of the REACH Regulation, a technical dossier registered at more than 1000 tonnes per year shall contain as a minimum the information specified in Annexes VII to IX of the REACH Regulation.

1. *In vitro* gene mutation study in bacteria (Annex VII, Section 8.4.1.)

Pursuant to Articles 10(a)(vi) and/or (vii), 12(1)(e) and 13(4) of the REACH Regulation, a technical dossier registered at [redacted] per year shall contain as a minimum the information specified in Annexes VII to X of the REACH Regulation.

An "*In vitro* gene mutation study in bacteria" is a standard information requirement as laid down in Annex VII, Section 8.4.1. of the REACH Regulation. Adequate information on this endpoint needs to be present in the technical dossier for the registered substance to meet this information requirement.

Article 13(1) of the REACH Regulation provides that information on intrinsic properties of substances may be generated by means other than tests. Such other means include the use of information from structurally related substances (grouping of substances and read-across), "provided that the conditions set out in Annex XI are met".

You have sought to adapt this information requirement according to Annex XI, Section 1.5. of the REACH Regulation by providing study records for a:

- *NTP technical report on 1-pentanol (CAS No 71-41-0), 1986* with the analogue substance 1-pentanol (CAS No 71-41-0) and
- *Union Carbide (1983) Primary Amyl Alcohol Salmonella/Microsome (Ames) Bacterial Mutagenicity Assay* with the analogue substance primary amyl alcohol (CAS: 94624-12-1).

In the dossier's summary section of 7.6 Genetic toxicity you state "*Due to the structural similarities, the same result can be expected for 3-methylbutan-1-ol.*"

Annex XI, Section 1.5 requires a structural similarity among the substances within a group or category such that relevant properties of a substance within the group can be predicted from the data on reference substance(s) within the group by interpolation. The following analysis presents your justification for the proposed grouping approach and read-across hypothesis, together with ECHA's analysis concerning the justification.

Structural similarity and dissimilarity of the individual substances and the scientific explanation on why and how these structural features allow predictions

In order to meet the provisions in Annex XI, Section 1.5 to predict human health effects from data for a reference substance within the group by interpolation to other substances in the group, ECHA considers that structural similarity alone is not sufficient. It has to be justified why such prediction is possible in view of the identified structural differences, and the provided evidence has to support such explanation. In particular, the structural similarities must be linked to a scientific explanation of how and why a prediction is possible.

The registered substance is 3-methylbutan-1-ol and the proposed read across source susbtances are 1-pentanol and primary amyl alcohol. ECHA notes that the target and source subtances have differences regarding to the branching and carbon numbers and you have not addressed the effect of these differences.

ECHA concludes, that you have not addressed the structural differences between the source substances and the target substance for read-across studies addressing the endpoint in question, and did not explain why those differences would not lead to differences in the toxicological properties of the target and analogue substance.

Therefore, your adaptation of the information requirement is rejected.

As explained above, the information provided on this endpoint for the registered substance in the technical dossier does not meet the information requirement. Consequently there is an information gap and it is necessary to provide information for this endpoint.

ECHA considers that the bacterial reverse mutation test (test method EU B.13/14. / OECD TG 471) is appropriate to address the standard information requirement of Annex VII, Section 8.4.1. of the REACH Regulation.

ECHA notes that in your comments to the draft decision, you agree to perform the requested test.

Therefore, pursuant to Article 41(1) and (3) of the REACH Regulation, you are requested to submit the following information derived with the registered substance subject to the present decision: Bacterial reverse mutation test (test method: EU B.13/14. / OECD TG 471)

2. Extended one-generation reproductive toxicity study (Annex X, Section 8.7.3.)

Pursuant to Articles 10(a)(vi) and/or (vii), 12(1)(e) and 13(4) of the REACH Regulation, a technical dossier registered at [redacted] per year shall contain as a minimum the information specified in Annexes VII to X of the REACH Regulation.

The basic test design of an extended one-generation reproductive toxicity study (test method EU B.56./OECD TG 443 with Cohorts 1A and 1B, without extension of Cohort 1B to include a F2 generation, and without Cohorts 2A, 2B and 3) is a standard information requirement as laid down in column 1 of 8.7.3., Annex X. If the conditions described in column 2 of Annex X are met, the study design needs to be expanded to include the extension of Cohort 1B, Cohorts 2A/2B, and/or Cohort 3. Adequate information on this endpoint needs to be present in the technical dossier for the registered substance to meet this information requirement.

a) The information requirement

You have not provided any study record of an extended one-generation reproductive toxicity study in the dossier that would meet the information requirement of Annex X, Section 8.7.3.

Article 13(1) of the REACH Regulation provides that information on intrinsic properties of substances may be generated by means other than tests. Such other means include the use of weight of evidence adaptation and the use of information from structurally related substances (grouping of substances and read-across), "provided that the conditions set out in Annex XI are met".

In your dossier, while you have not explicitly claimed a weight of evidence adaptation using information from the registered substance and structurally analogous substances, you have provided information that could be interpreted as an attempt to adapt the information requirement according to Annex XI, Section 1.2 and Section 1.5. You provided the following studies in the dossier section 7.8.1:

- A combined repeated dose toxicity study with reproduction/developmental toxicity screening test, OECD TG 422, with the registered substance ([redacted])
- A sub-chronic toxicity study, OECD TG 408, with the registered substance (Butterworth, 1978)
- A sub-chronic toxicity study, OECD TG 408, done using the analogue substance pentan-1-ol, EC number 200-752-1, CAS number 71-41-0 ([redacted])

For prenatal developmental toxicity you have provided in section 7.8.2.:

- OECD Guideline 414 (Prenatal Developmental Toxicity Study) in rat, with the registered substance ([redacted])
- OECD Guideline 414 (Prenatal Developmental Toxicity Study) in rabbit, with the registered substance ([redacted])
- A non-guideline developmental toxicology evaluation of 1-pentanol, 1-hexanol, and 2-ethyl-1-hexanol administered by inhalation to rats (Nelson, 1989)
- OECD Guideline 414 (Prenatal Developmental Toxicity Study) of Primary Amyl Acetate Vapor in Fischer 344 Rats ([redacted])
- OECD Guideline 414 (Prenatal Developmental Toxicity Study) of Primary Amyl Acetate Vapor in New Zealand White Rabbits ([redacted])
- A range-finding study for an OECD Guideline 414 (Prenatal Developmental Toxicity Study) in rats with the registered substance ([redacted])
- A range-finding study for an OECD Guideline 414 (Prenatal Developmental Toxicity Study) in rats with the registered substance ([redacted])

In addition, you provided in section 7.8.1 the following justification for the adaptation for the reproductive toxicity, considering that the study is scientifically unjustified:

"*REACH allows the assessment of the reproductive toxicity of a given chemical with the help of findings from studies with repeated administration. This is in line with the idea that the information requirements under REACH are regarded as the evaluation of endpoints which does not necessarily require data from specific studies.*

3-Methylbutan-1-ol and its structural analogue pentan-1-ol were tested in two 90d repeated dose studies ([redacted]; Butterworth et al. 1978), in a Combined Repeated-Dose / Reproductive Developmental Toxicity study according to OECD TG 422 ([redacted]), and in prenatal developmental studies in rats and rabbits (Nelson et al. 1989; [redacted]). In addition, there are experimental data available from the structural analogue primary amyl acetate (reaction mass of 2-methyl butyl acetate and pentyl acetate, EC No. 908-918-1) which was shown in in-vivo and in-vitro studies to be rapidly hydrolyzed by liver metabolism into the corresponding alcohols (Oxo Process Panel - ACC 2004; [redacted]).

Primary amyl acetate was tested in a 14-weeks repeated dose study by the inhalation route ([redacted]), and in prenatal developmental studies in rats and rabbits ([redacted]). None of these studies showed any concern regarding reproductive toxicity of pentan-1-ol, 3-methylbutan-1-ol or primary amyl acetate, respectively. Thus, a two-generation study is not necessary. This waiving argument is in line with the guidance document R7a and scientifical argumentation as below.

Because of a high correlation, histopathology data and organ weights from repeated dose studies may be used to assess male fertility (Mangelsdorf, 2003). These parameters, taken from 90 day studies, were in fact shown to be more sensitive than fertility parameters that were measured during multi-generation studies. It could also be shown that exposure for 4 weeks suffices for an assessment of male fertility, although 90 day studies have been regarded as superior in the past because they cover a complete cycle of spermatogenesis (Mangelsdorf, 2003). If such a 28 day study shows neither relevantly elevated testis or ovary weights nor histopathological alterations in those organs, the weight of the evidence is that effects on reproduction are also not expected (BAuA Forschungsbericht Fb 984, 2003). A comparison of more than one hundred 90 day studies with two-generation studies that used the same test substance additionally showed that the NOAELs differed by less than the variation limit of studies, i.e. a factor of two (Janer, 2007). Therefore, the information gained from a two-generation study can be regarded as minimal if a 90 day study has been performed."

References

BAuA (2003). Extrapolation from results of animal studies to humans for the endpoint male fertility. Forschungsbericht Fb 984.

Janer G, Hakkert BC, Piersma, AH, Vermeire T, Slob W (2007). A retrospective analysis of the added value of the rat two-generation reproductive toxicity study versus the rat subchronic toxicity study. Reproductive Toxicol 24: 103-113

Mangelsdorf I, Buschmann J, Orthen B (2003). Some aspects relating to the evaluation of the effects of chemicals on male fertility. Reg Toxicol Pharmacol 37: 356-369"

In addition to the studies provided in the dossier (listed above) you refer in your adaptation above to the following information which is not provided in the dossier: Baua, 2003, Janer, et al. (2007), Mangelsdorf, et al. 2003., [redacted]

However, ECHA notes that your adaptation does not meet the general rules for adaptation of Annex XI, Section 1.2., because it is not possible to assume/conclude based on the available information if the registered substance has or has not a hazardous property on reproductive toxicity, i.e. sexual function and fertility. This information is required at Annex X, Section 8.7.3, defined by the information requirement for an extended-one reproductive toxicity study.

An extended one-generation reproductive toxicity study is designed to provide information on the sexual function and fertility of parental generation (mating after exposure of the whole spermatogenesis and folliculogenesis), supported by both many functional and histopathological parameters, pregnancy maintenance and litter data. In addition, it provides an evaluation of the pre- and postnatal effects of substances on development as well as a thorough evaluation of systemic toxicity in pregnant and lactating females and young and adult offspring.

Furthermore, detailed examination of key developmental endpoints, such as offspring viability, neonatal health, developmental status at birth, and physical and functional development until adulthood, is expected to identify specific target organs in the offspring based on organ weight and histopathological information. In certain conditions, specified in Annex X, Section 8.7.3, column 2, and further elaborated in ECHA Guidance on information requirements and chemical safety assessment R.7a, chapter R.7.6 (version 4.1, October 2015), further information from F1 generation must be produced: 1) reproductive toxicity in form of functional fertility and reproductive performance, and/or 2) developmental neurotoxicity, and/or 3) developmental immunotoxicity (for further information see OECD TG 443 and ECHA Guidance on information requirements and chemical safety assessment R.7a, chapter R.7.6 (version 4.1, October 2015)).

Your weight of evidence approach is based on information from *in vitro* and *in vivo* toxicokinetics investigations, 14-week study, 90-day studies, screening studies (OECD TG 422), and prenatal developmental toxicity studies in rats and rabbits using the registered substance or proposed structurally analogous substances to the registered substance.

As information from structurally analogous substances is used as part of the weight of evidence approach, ECHA has also evaluated this information against the requirements of Annex XI, 1.5 on the use of grouping and read-across. Annex XI, Section 1.5 requires a structural similarity among the substances within a group or category such that relevant properties of a substance within the group can be predicted from the data on reference substance(s) within the group by interpolation. The following analysis presents your justification for the proposed grouping approach and read-across hypothesis, together with ECHA's analysis concerning the justification.

Structural similarity and dissimilarity of the individual substances and the scientific explanation on why and how these structural features allow predictions

In order to meet the provisions in Annex XI, Section 1.5 to predict human health effects from data for a reference substance within the group by interpolation to other substances in the group, ECHA considers that structural similarity alone is not sufficient. It has to be justified why such prediction is possible in view of the identified structural differences and the provided evidence has to support such explanation. In particular, the structural similarities must be linked to a scientific explanation of how and why a prediction is possible.
The registered substance is 3-methylbutan-1-ol and the proposed read across source susbtances are pentan-1-ol and primary amyl acetate. ECHA notes that the target and source subtances have differences regarding to the branching, carbon numbers, and functional groups, and you have not addressed the effect of these differences. You state that primary amyl acetate (reaction mass of 2-methyl butyl acetate and pentyl acetate) has been shown to rapidly hydrolyse by liver metabolism into the corresponding alcohols. However, this statement has not been substantiated with data and it has not been justified why and how the exposure to the parent substance does/does not contribute to the toxicity.

ECHA concludes, that you have not addressed the structural differences between the source substances and the target substance for read across studies addressing the endpoint in question, and did not explain why those differences would not lead to differences in the toxicological properties of the target and analogue substances.

Thus, the use of data from the proposed source substances is not justified. ECHA considers that you have not explained how this information from structural analogues can be used in a weight of evidence approach.

In addition to assessing the information from these analogues against the requirements of Annex XI, 1.5, ECHA has assessed the weight of each of the lines of evidence separately and together and the conclusions of this assessment are reported below.

Many study types provided may be relevant providing pieces of elements for weighing evidence for reproductive toxicity. The information for the following elements, critical for reproductive toxicity required at this Annex level, have been evaluated weighing the evidence in this specific case and grouped as follows: 1) effects on the histopathologically observable changes in reproductive organs and other organs in the parental and F1 generation; 2) functional fertility and reproductive performance of the parental generation; 3) postnatal development and sexual maturation and endocrine disruption mode of action. Furthermore, your justification "*the information gained from a two-generation study can be regarded as minimal if a 90 day study has been performed.* " with literature references is addressed.

1) Screening study (OECD TG 422) and 90-day and 14-week repeated (referred study [redacted] not found in the dossier) dose toxicity studies may provide information on histopathology of reproductive organs and other organs but at a lower statistical power than required at Annex X information requirement (e.g. 5 or 10 animals vs 20 animals per dose group). In addition, the spermatogenesis and the folliculogenesis are not fully covered by the screening study. There is no information on the histopathologically observable effects in reproductive organs in F1 generation from any of the studies provided. Lack of hazardous properties on sexual function and fertility cannot be assumed solely based on this information (histopathologally observable effects).
2) Limited information on male and female reproductive performance such as gonadal function, mating behaviour, conception, development of the conceptus and parturition is provided from the screening study (OECD TG 422). The statistical power is limited and the premating exposure duration and postnatal period is shorter than that required for the Annex X information requirement. The statistical power is reduced due to less animals (10 vs 20 per dose group), the premating exposure duration is 5 times shorter (2 weeks vs 10 weeks), and the postnatal period is much shorter (4 days vs 90 days). Information from the pre-natal developmental toxicity study (OECD TG 414) regarding to reproductive toxicity (sexual function and fertility) is limited to the maintenance of the pregnancy from implantation up to close to the parturition. The sub-chronic toxicity or the 14-week studies do not provide any information on functional fertility and reproductive performance. Lack of hazardous properties on sexual function and fertility cannot be assumed solely based on this information or in combination with the information above.
3) The studies provided do not provide information on hazardous properties to the postnatal development including sexual maturation for the F1 generation. Furthermore, information on sperm parameters and information on endocrine modes of action are missing. Lack of information on these aspects does not allow assuming on the hazardous properties on sexual function and fertility regarding these aspects alone or in combination with the information above.

Regarding your claims that 1) histopathology data and organ weights from repeated dose toxicity studies may be used to assess male fertility, 2) and are in fact more sensitive than fertility parameters, 3) and that exposure for 4 weeks suffices for an assessment of male fertility, 4) and if a 28-day study shows neither relevantly elevated testis or ovary weight nor histopathological alterations, then effects on reproduction are not expected, 5) and results from 90-day and two-generation studies differ less than a factor 2, ECHA notes that you have not provided a justification on why and how these claims and observations from other substances can be used and read across to predict the properties of the registered substance regarding the information requirement in question you attempt to adapt. The studies referred to in the adaptation justification were not included in the dossier and thus, your adaptation lacks not only the justification on why and how but also the data. According to Annex XI, 1.2 "*In all cases adequate and reliable documentation shall be provided.*"

Taken together, you have not provided a justification why and how the information from proposed structurally analogous substances and published literature from other substances could be used to predict the reproductive toxicity properties of the registered substance either on their own, or as part of a weight of evidence approach. Furthermore, the studies provided do not cover critical information on reproductive toxicity such as reproductive toxicity in generation exposed *in utero* and postnatal period and you have not explained how and why the missing information can be predicted based on the information provided.

Thus, the information from these studies do not allow to assume/conclude that the substance has not hazardous properties with regard to sexual function and fertility. Therefore, your adaptation of the information requirement based on a weight of evidence approach in your technical dossier is rejected.

In your comments to the draft decision you introduce a category approach for four different pentanols, and you considered that "data generated for any category member can be used to predict the toxicological properties of the registered substance 3-methylbutanol".

At the same time, you stated that you "agree with ECHA that there is an information gap concerning postnatal development for all members of the category and that only limited information from an OECD 422 study is available to cover effects on fertility". You also indicated that the same issue has been addressed in a draft decision on pentanols, branched and linear, where also an extended one generation reproductive toxicity study was requested for that substance. You indicated that one extended one generation reproductive toxicity study performed with the category member pentan-1-ol could be used to address this endpoint for all category members.

Annex XI, Section 1.5. provides that "*substances whose physicochemical, toxicological and eco-toxicological properties are likely to be similar or follow a regular pattern as result of structural similarity may be considered as a group or 'category' of substances*". One prerequisite for a prediction based on read-across therefore is that the substances involved are structural similar and are likely to have similar properties. One important aspect in this regard is the analysis of the data matrix to compare the properties of source and target substances and to establish whether indeed they are similar or follow a regular pattern.

You have provided such a data matrix in your comments to the draft decision. Based on this, you claim that the substances "demonstrate very consistent properties with regard to human health". ECHA considers that based on available information on physico-chemical properties, toxicokinetics and acute and repeated dose toxicity studies with the category members, show similarity in those properties.

However with regards to the reproductive toxicity endpoint there is a lack of reproductive toxicity studies available for the category members. Specifically the category members contain only one screening study for reproductive/developmental toxicity. ECHA considers that in contrast to the other endpoints addressed by your category, the data you have provided does not provide sufficient evidence to conclude that the pentanol category members have similar toxicological profile with regard to toxicity to reproduction. Therefore ECHA cannot verify based on the available information that the proposed test with pentan-1-ol can be used to predict reproductive toxicity properties of the other members of the pentanol category or to conclude that all pentanol category members "are likely to be similar or follow a regular pattern as result of structural similarity may be considered as a group or 'category' of substances".

ECHA notes that due to the absence of evidence on reproductive toxicity in the category, it is not possible to determine which member of the category may represent a worst case in an extended one generation reproductive toxicity study. In addition, as noted above, there is insufficient evidence to conclude that members of the category have similar effects in this study.

In addition, ECHA notes that although you favor performing the study on 1-pentanol, you have not demonstrated why read-across from this particular substance would be easier/more suitable, or would demonstrate a worst case scenario for the category. Taking these considerations into account, there is insufficient evidence to justify testing 1-pentanol instead of the registered substance. Hence your category approach is rejected for the reproductive toxicity endpoint.

Hence, the information provided on this endpoint for the registered substance in the technical dossier does not meet the information requirement. Consequently there is an information gap and it is necessary to provide information for this endpoint. Thus, an extended one-generation reproductive toxicity study according Annex X, Section 8.7.3. is required. The following refers to the specifications of this required study.

b) The specifications for the study design

Premating exposure duration and dose-level setting

To ensure that the study design adequately addresses the fertility endpoint, the duration of the premating exposure period and the selection of the highest dose level are key aspects to be considered. According to ECHA Guidance, the starting point for deciding on the length of premating exposure period should be ten weeks to cover the full spermatogenesis and folliculogenesis before the mating, allowing meaningful assessment of the effects on fertility.

Ten weeks premating exposure duration is required because there is no substance specific information in the dossier supporting shorter premating exposure duration as advised in the ECHA *Guidance on information requirements and chemical safety assessment* R.7a, chapter R.7.6 (version 4.1, October 2015).

The highest dose level shall aim to induce some toxicity to allow comparison of effect levels and effects of reproductive toxicity with those of systemic toxicity. The dose level selection should be based upon the fertility effects with the other cohorts being tested at the same dose levels.

It is recommended that results from a range-finding study (or range finding studies) for the extended one-generation reproductive toxicity study are reported with the main study. This will support the justifications of the dose level selections and interpretation of the results.

Species and route selection

According to the test method EU B.56/ OECD TG 443, the rat is the preferred species. On the basis of this default assumption, ECHA considers that testing should be performed in rats.

ECHA considers that the oral route is the most appropriate route of administration for substances except gases to focus on the detection of hazardous properties on reproduction as indicated in ECHA *Guidance on information requirements and chemical safety assessment* (version 4.1, October 2015) R.7a, chapter R.7.6.2.3.2. Since the substance to be tested is a liquid, ECHA concludes that testing should be performed by the oral route.

c) Outcome

Therefore, pursuant to Article 41(1) and (3) of the REACH Regulation, you are requested to submit the following information derived with the registered substance subject to the present decision: Extended one-generation reproductive toxicity study (test method EU B.56./OECD TG 443), in rats, oral route, according to the following study-design specifications:

- Ten weeks premating exposure duration for the parental (P0) generation;
- Dose level setting shall aim to induce some toxicity at the highest dose level;
- Cohort 1A (Reproductive toxicity);
- Cohort 1B (Reproductive toxicity) without extension to mate the Cohort 1B animals to produce the F2 generation;

Notes for your consideration

The conditions to include the extension of Cohort 1B are currently not met. Furthermore, no triggers for the inclusion of Cohorts 2A and 2B (developmental neurotoxicity) and Cohort 3 (developmental immunotoxicity) were identified. However, you may expand the study by including the extension of Cohort 1B, Cohorts 2A and 2B and/or Cohort 3 if new information becomes available after this decision is issued to justify such an inclusion. Inclusion is justified if the new information shows triggers which are described in column 2 of Section 8.7.3., Annex X and further elaborated in ECHA *Guidance on information requirements and chemical safety assessment* R.7a, chapter R.7.6 (version 4.1, October 2015). You may also expand the study to address a concern identified during the conduct of the extended one-generation reproduction toxicity study and also due to other scientific reasons in order to avoid a conduct of a new study. The justification for the expansion must be documented. The study design must be justified in the dossier and, thus, the existence/non-existence of the conditions/triggers must be documented.

Deadline to submit the requested information in this decision

In the draft decision communicated to you the time indicated to provide the requested information was 24 months from the date of adoption of the decision. In your comments on the draft decision, you requested an extension of the timeline to 36 months. You sought to justify this request by need for planning and analysis of the range finding study results. Therefore, ECHA has granted the request and set the deadline to 36 months from the date of adoption of the decision.

Appendix 2: Procedural history

For the purpose of the decision-making, this decision does not take into account any updates of your registration after the date when the draft decision was notified to you under Article 50(1) of the REACH Regulation.

The compliance check was initiated on 4 December 2015.

The decision making followed the procedure of Articles 50 and 51 of the REACH Regulation:]

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

ECHA took into account your comments and did not amend the requests.

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.

Appendix 3: Further information, observations and technical guidance

1. The substance subject to the present decision is provisionally listed in the Community rolling action plan (CoRAP) for start of substance evaluation in 2017.

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

3. Failure to comply with the request(s) in this decision, or to fulfil otherwise the information requirement(s) with a valid and documented adaptation, will result in a notification to the enforcement authorities of your Member State.

4. In relation to the information required by the present decision, the sample of the substance used for the new test(s) must be suitable for use by all the joint registrants. Hence, the sample should have a composition that is suitable to fulfil the information requirement for the range of substance compositions manufactured or imported by the joint registrants. It is the responsibility of all joint registrants who manufacture or import the same substance to agree on the appropriate composition of the test material and to document the necessary information on their substance composition. In addition, it is important to ensure that the particular sample of the substance tested in the new test(s) is appropriate to assess the properties of the registered substance, taking into account any variation in the composition of the technical grade of the substance as actually manufactured or imported by each registrant. If the registration of the substance by any registrant covers different grades, the sample used for the new test(s) must be suitable to assess these grades. Finally there must be adequate information on substance identity for the sample tested and the grade(s) registered to enable the relevance of the test(s) to be assessed.