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NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

PUBLIC REPORT

Benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, C₁₃₋₁₅-branched and linear alkyl esters

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (the Act) and Regulations. This legislation is an Act of the Commonwealth of Australia. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Department of Health, and conducts the risk assessment for public health and occupational health and safety. The assessment of environmental risk is conducted by the Department of the Environment and Energy.

This Public Report is available for viewing and downloading from the NICNAS website or available on request, free of charge, by contacting NICNAS. For requests and enquiries please contact the NICNAS Administration Coordinator at:

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SUMMARY

The following details will be published in the NICNAS Chemical Gazette:

ASSESSMENT REFERENCE	APPLICANT(S)	CHEMICAL OR TRADE NAME	HAZARDOUS CHEMICAL	INTRODUCTION VOLUME	USE
STD/1675	DIC Australia Pty Ltd	Benzenepropanoic acid, 3,5-bis(1,1- dimethylethyl)-4- hydroxy-, C ₁₃₋₁₅ - branched and linear alkyl esters	No	≤ 20 tonnes per annum	Component of industrial printing ink

CONCLUSIONS AND REGULATORY OBLIGATIONS

Hazard Classification

Based on the available information, the notified chemical is not classified according to the *Globally Harmonised System of Classification and Labelling of Chemicals* (GHS), as adopted for industrial chemicals in Australia.

Human Health Risk Assessment

Under the conditions of the occupational settings described, the notified chemical is not considered to pose an unreasonable risk to the health of workers.

When used as a component of industrial printing ink at a maximum concentration of 5%, the notified chemical is not considered to pose an unreasonable risk to public health.

Environmental Risk Assessment

Based on the low hazard and reported use pattern, the notified chemical is not considered to pose an unreasonable risk to the environment.

Recommendations

CONTROL MEASURES

Occupational Health and Safety

- A copy of the SDS should be easily accessible to employees.
- If products and mixtures containing the notified chemical are classified as hazardous to health in accordance with the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)* as adopted for industrial chemicals in Australia, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation should be in operation.

Emergency procedures

• Spills or accidental release of the notified chemical should be handled by physical containment, collection and subsequent safe disposal

Disposal

• Where reuse or recycling are not appropriate, dispose of the notified chemical in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

Regulatory Obligations

Secondary Notification

This risk assessment is based on the information available at the time of notification. The Director may call for the reassessment of the chemical under secondary notification provisions based on changes in certain circumstances. Under Section 64 of the *Industrial Chemicals (Notification and Assessment) Act (1989)* the notifier, as well as any other importer or manufacturer of the notified chemical, have post-assessment regulatory obligations to notify NICNAS when any of these circumstances change. These obligations apply even when the notified chemical is listed on the Australian Inventory of Chemical Substances (AICS).

Therefore, the Director of NICNAS must be notified in writing within 28 days by the notifier, other importer or manufacturer:

(1) Under Section 64(2) of the Act; if

- the function or use of the chemical has changed from a component of industrial printing ink, or is likely to change significantly;
- the amount of chemical being introduced has increased, or is likely to increase, significantly;
- the chemical has begun to be manufactured in Australia;
- additional information has become available to the person as to an adverse effect of the chemical on occupational health and safety, public health, or the environment.

The Director will then decide whether a reassessment (i.e. a secondary notification and assessment) is required.

Safety Data Sheet

The SDS of the notified chemical provided by the notifier was reviewed by NICNAS. The accuracy of the information on the SDS remains the responsibility of the applicant.

ASSESSMENT DETAILS

1. APPLICANT AND NOTIFICATION DETAILS

APPLICANT

DIC Australia Pty Ltd (ABN: 12 000 079 0550)

42 Sunmore Close

HEATHERTON VIC 3202

NOTIFICATION CATEGORY

Standard: Chemical other than polymer (more than 1 tonne per year)

EXEMPT INFORMATION (SECTION 75 OF THE ACT)

No details are exempt from publication.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

Schedule data requirements are not varied.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None

NOTIFICATION IN OTHER COUNTRIES

Europe (2008)

2. IDENTITY OF CHEMICAL

MARKETING NAME(S) ANOX® 1315

CAS NUMBER

171090-93-0

CHEMICAL NAME

Benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, C₁₃₋₁₅-branched and linear alkyl esters

OTHER NAMES

A mixture of: esters of C_{14} - C_{15} branched alcohols with 3,5-di-t-butyl-4-hydroxyphenyl propionic acid, C_{15} branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate, C_{13} branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate

Benzene propanoic acid, 3,5-bis (1,1-dimethyl ethyl) 4-hydroxy, isomeric mixture of tetradecyl and pentadecyl esters

3,5-Bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoic acid, branched and linear alkyl(C_{13 15}) esters

C₁₃ branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate

C₁₅ branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate

Reaction mass of: esters of C₁₄-C₁₅ branched alcohols with 3,5-di-t-butyl-4-hydroxyphenyl propionic acid

Reaction mass of: esters of C_{14} - C_{15} branched alcohols with 3,5-di-t-butyl-4-hydroxyphenyl propionic acid $|C_{15}$ branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate $|C_{13}|$ branched and linear alkyl 3,5-bis(1,1-dimethylethyl)-4-hydroxybenzenepropanoate

MOLECULAR FORMULA

Unspecified

The notified chemical is a substance of Unknown, of Variable Composition, or of Biological Origin (UVCB)

The notifier provided the following:

 $C_{30}H_{52}O_3 - C_{32}H_{56}O_3 \\$

STRUCTURAL FORMULA

Representative structural formulae were provided by the notifier.

Where $R = C_{13-15}$ branched and linear alkyl chains

The tetradecyl (C_{14}) and pentadecyl (C_{15}) ester derivatives are the main components of the notified chemical. The typical alkyl chain length distribution is listed below.

R-group chain length	Weight %
Dodecyl (C ₁₂)	≤1
Tridecyl (C ₁₃)	1 - 5
Tetradecyl (C ₁₄)	50 - 60
Pentadecyl (C ₁₅)	35 - 45
Hexadecyl (C_{16})	≤ 0.2

MOLECULAR WEIGHT 460.74 – 488.79 g/mol

ANALYTICAL DATA

Reference NMR, IR, GCMS, UV spectra were provided.

3. COMPOSITION

DEGREE OF PURITY 97.3%

HAZARDOUS IMPURITIES

Chemical Name Benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, methyl ester

CAS No. 6386-38-5 Weight % 2.66

Hazardous Properties Not listed on HCIS. Notifier supplied the following: H411 (Toxic to aquatic life with long-lasting effects)

11411 (Toxic to aquatic file with long-lasting effe

Chemical Name Alcohols, C₁₄₋₁₆

CAS No. 68333-80-2 Weight % <1

Hazardous Properties Not listed on HCIS. ECHA website lists the following:

H400 (Very toxic to aquatic life)

NON HAZARDOUS IMPURITIES (> 1% BY WEIGHT)

None

ADDITIVES/ADJUVANTS

None

4. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AT 20 °C AND 101.3 kPa: Yellow viscous liquid

Property	Value	Data Source/Justification
Glass Transition Temperature	-56.3 °C	Measured
Boiling Point	$220 - 245$ °C at 6.7×10^{-2} kPa	Measured
Density	939 kg/m 3 at 20 °C	Measured
Vapour Pressure	0.166 kPa at 20 °C	Measured
Water Solubility	0.33 mg/L at 25 °C	Measured
Fat solubility	79.35%	Measured
Hydrolysis as a Function of	Not determined	Contains hydrolysable ester functionality
pН		but is not expected to hydrolyse due to low
		water solubility
Partition Coefficient	$\log P_{ow} = 3.56$ at 25 °C	Measured; unlikely to bioaccumulate
(n-octanol/water)		
Surface tension	62.05 mN/m at 20 °C (at	Measured
	concentration of 0.29 mg/L)	
Adsorption/Desorption	$\log K_{oc} = > 5.0 \text{ at } 20 ^{\circ}\text{C}$	Measured
Dissociation Constant	Not determined	Contains phenolic functionalities, which can
		dissociate in the environmentally relevant
		pH range $(4-9)$
Flash Point	229 ± 1 °C	Measured
Flammability	Not determined	Not expected to be a flammable liquid based
		on the flash point
Autoignition Temperature	338 ± 2 °C	Measured
Thermal sensitivity	No explosion observed	Measured
Shock sensitivity	No explosion observed	Measured
Oxidising Properties	Not determined	Contains no functional groups that would
		imply oxidative properties

DISCUSSION OF PROPERTIES

For full details of tests on physical and chemical properties, refer to Appendix A.

Reactivity

The notified chemical is expected to be stable under normal conditions of use.

Physical Hazard Classification

Based on the submitted physico-chemical data depicted in the above table, the notified chemical is not recommended for hazard classification according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

5. INTRODUCTION AND USE INFORMATION

Mode of Introduction of Notified Chemical (100%) Over Next 5 Years

The notified chemical will not be manufactured in Australia. It will be imported as a component of finished industrial ink products (at concentrations of $\leq 5\%$) and local repackaging is not expected. Neat form of the notified chemical will not be imported and no local reformulation will occur in Australia.

MAXIMUM INTRODUCTION VOLUME OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

Year	1	2	3	4	5
Tonnes	≤ 20	≤ 20	≤ 20	≤ 20	≤ 20

PORT OF ENTRY Melbourne or Sydney

IDENTITY OF RECIPIENTS

DIC Australia

TRANSPORTATION AND PACKAGING

Typical packaging of finished ink products containing the notified chemical will include 200 kg drums and 1,000 kg bulk bags excluding intermediate bulk container (IBC) tankers. The ink products will be distributed by road for commercial sale.

USF

The notified chemical is a phenolic antioxidant used as a carrier at concentrations of $\leq 5\%$ in printing inks for direct use in large scale industrial print presses.

OPERATION DESCRIPTION

Finished printing ink products containing the notified chemical at concentrations of \leq 5% will be handled by workers. The ink product in 200 kg drums or 1,000 kg bulk bags will be transferred either via special drum pumps directly to industrial printing presses or by gravity into larger capacity (> 1,000 kg) bulk tanks for further processes.

6. HUMAN HEALTH IMPLICATIONS

6.1. Exposure Assessment

6.1.1. Occupational Exposure

CATEGORY OF WORKERS

Category of Worker	Exposure Duration (hours/day)	Exposure Frequency (days/year)
Transport and storage	2 - 4	150
Repackaging	4 - 8	200
Service technicians	8	200
Office	8	200

EXPOSURE DETAILS

Transport and Storage

Transport and storage workers will handle the notified chemical at concentrations of $\leq 5\%$ in sealed bulk containers. Dermal or ocular exposure to the notified chemical may occur in the unlikely event of an accident when the containers are breached.

End Use

Workers may come into contact with printing ink products containing the notified chemical at concentrations of $\leq 5\%$. Dermal or ocular exposure of workers to the notified chemical may occur during the transfer of printing inks from original containers into industrial printer presses or into larger ink tanks (> 1,000 kg). Dermal or ocular exposure is also possible during cleaning or maintaining of the printers, or in the unlikely event of printer ink leaks. According to the notifier, exposure is likely to be reduced by the use of automated processes and appropriate PPE including safety glasses, impervious gloves and coveralls.

In addition, dermal exposure to the notified chemical may occur when workers handle printed pages before the ink dries or if ink-stained parts of printers are touched. Exposure to the notified chemical will be reduced once the ink dries, as the notified chemical will be bound to the matrix of the substrates and is not expected to be available for further exposure.

Inhalation exposure to the notified chemical is not expected, unless ink aerosols are formed during printer operations.

6.1.2. Public Exposure

The printing ink products containing the notified chemical will not be sold to the general public for home and office use. Therefore, direct public exposure to the notified chemical is unlikely to occur.

Members of the public may come into contact with printed materials. However, once the ink dries, the notified chemical will be bound to the matrix of the substrates and is not expected to be available for exposure.

6.2. Human Health Effects Assessment

The results from toxicological investigations conducted on the notified chemical are summarised in the following table. For full details of the studies, refer to Appendix B.

Result and Assessment Conclusion
LD50 > 5,000 mg/kg bw; low toxicity
LD50 > 2,000 mg/kg bw; low toxicity
LC50 > 7.53 mg/L/4 hour; low toxicity
slightly-irritating
slightly-irritating
no evidence of sensitisation
$NOEL^a = 10 \text{ mg/kg bw/day}$
$(NOAEL^b = 100 \text{ mg/kg bw/day})$
non mutagenic
non clastogenic
non mutagenic
non genotoxic
NOEL a (parental, F0) = 10 mg/kg bw/day
$(NOAEL^b = 50 \text{ mg/kg bw/day})$
NOEL ^a (first filial generation, F1) = 50 mg/kg bw/day
(NOAEL b > 50 mg/kg bw/day but < 1,000 mg/kg bw/day)

^a No observed effect level (NOEL)

Toxicokinetics, Metabolism and Distribution

No toxicokinetic data on the notified chemical were submitted. Given the low molecular weight (< 500 g/mol) of the notified chemical and a log P_{ow} of 3.56, absorption across biological membranes is likely to occur.

Acute Toxicity

The notified chemical is of low acute oral, dermal and inhalation toxicity based on studies conducted in rats.

In the acute inhalation toxicity study, 4 hour exposure to a gravimetric aerosol concentration of 7.53 mg/L of the notified chemical resulted in unkempt appearance in the test animals. One animal appeared subdued and showed hunched posture for 24 hours.

Irritation and Sensitisation

Based on results from eye and skin irritation studies conducted in rabbits, the notified chemical was considered to be slightly-irritating. Minor irritation effects observed one hour after exposure in the animals included slight erythema (grade 1) of the skin and slight conjunctival redness (grade 1) of the eyes. The notified chemical was not classified as an irritant under GHS.

No evidence of sensitisation for the notified chemical was observed in a Buehler test conducted in guinea pigs.

Repeated Dose Toxicity

In a 28 day repeated dose oral toxicity study, the notified chemical was administered to rats at dosages of 10, 100 and 1,000 mg/kg bw/day. Treatment related increased liver weight and decreased leucocyte count were observed in the mid and high dose group rats. Statistically significant increase in liver weights in male rats in the high dose group (116% of absolute organ weight compared to control group) were reported while the increases in female rats were slight. The increase in liver weights was associated with dose-related hepatic centrilobular hypertrophy. However, no statistically significant changes in the liver enzyme (alkaline phosphatase) were noted. The effects on the liver were fully reversed in the recovery group treated at high dose after 28 days without treatment indicating it as an adaptive response to the treatment.

A decrease in leucocyte number was observed in all treated males and in females in the high dose group. On discontinuation of treatment, the leucocyte number in recovery animals treated at high dose was still reduced compared to the controls. This change reached statistical significance in females.

^b No observed adverse effect level (NOAEL)

The study authors concluded that the above liver and leucocyte effects were likely to be adaptive.

Based on the reported treatment related effects in rats in the mid and high dose groups, the study authors considered the no observed effect level (NOEL) to be 10 mg/kg bw/day. The no observed adverse effect level (NOAEL) could be considered as 100 mg/kg bw/day (or higher) based on liver weights and decreased leucocytes in recovery group females at 1,000 mg/kg bw/day.

Mutagenicity/Genotoxicity

The notified chemical was determined to be not mutagenic to the limit of the water solubility in an *in vitro* bacterial reverse mutation assay. The notified chemical was not considered to be clastogenic in an *in vitro* chromosome aberration test using Chinese hamster ovary cells. In an *in vitro* mammalian cell gene mutation test using mouse lymphoma cells, although limited equivocal results were seen in one of the test cultures without metabolic activation, the notified chemical was not considered to be mutagenic as the results were negative in a repeated test. The study authors of an *in vivo* mammalian micronucleus test conducted in rats concluded that the notified chemical was not genotoxic. However, there was no evidence recorded to support that the notified chemical reached the bone marrow of the treated rats.

Reproductive Toxicity

In a one-generation reproductive toxicity study, the notified chemical was administered by oral gavage doses of 10, 50 and 1,000 mg/kg bw/day to male rats during the pre-mating and mating periods, and to female rats during the pre-mating, mating, gestation and lactation periods. One female in the high dose group died due to difficult parturition. No other treatment related mortality or clinical signs were noted during the study.

At the high dose, the study authors noted maternal toxicity, including an increase (not statistically significant) of early resorptions associated with a decrease of live foetuses and an increase of still births. There was no clear indication as to whether these effects were caused by secondary non-specific consequences of systemic toxicity. However, no effects on postnatal survival and development of the first filial generation (F1) live pups were noted at any dose. No pathological changes were observed at the autopsy examinations on the parents (F0) and the F1 pups.

Decreases in mean daily food consumption and mean body weight gain were noted in F0 females in the mid and high dose groups. There were no treatment related effects reported in treated F0 males.

The study authors reported a NOEL of 10 mg/kg bw/day for F0 generation based on reduced weight gain in females at 50 mg/kg bw/day. The NOAEL could be 50 mg/kg bw/day as there were no adverse signs reported at this dose, other than reduced body weight gain due to reduced food consumption. The NOEL for developmental toxicity in F1 pups was reported to be 50 mg/kg bw/day due to developmental effects observed at $1,000 \, \text{mg/kg}$ bw/day. The NOAEL for developmental toxicity could be $> 50 \, \text{and} < 1,000 \, \text{mg/kg}$ bw/day.

Health Hazard Classification

Based on the available information, the notified chemical is not classified according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

6.3. Human Health Risk Characterisation

6.3.1. Occupational Health and Safety

The notified chemical is not considered to be hazardous based on the information provided, except at very high doses (for instance, at 1,000 mg/kg bw/day). It will only be imported in printing inks at concentrations of $\leq 5\%$. Therefore repeated or prolonged exposure to high concentrations is unlikely based on the assessed use pattern. Safe work practices, engineering controls and use of personal protective equipment (PPE) are expected to minimise exposure to the notified chemical.

Under the conditions of the occupational settings described, the notified chemical is not considered to pose an unreasonable risk to the health of workers.

6.3.2. Public Health

Direct public exposure to the notified chemical is unlikely to occur as the printing ink products containing the notified chemical will not be sold to the general public for home and office use. Members of the public may come into contact with materials printed with ink containing the notified chemical; however, once the ink dries,

the notified chemical will be bound to the matrix of the substrates and is not expected to be available for exposure.

When used in the proposed manner, the notified chemical is not considered to pose an unreasonable risk to public health.

7. ENVIRONMENTAL IMPLICATIONS

7.1. Environmental Exposure & Fate Assessment

7.1.1. Environmental Exposure

RELEASE OF CHEMICAL AT SITE

The notified chemical is not manufactured or reformulated in Australia; therefore no environmental release is expected from this category. Accidental spills of the notified chemical during import, transport or storage are expected to be adsorbed onto a suitable material and collected for disposal, in accordance with local government regulations.

RELEASE OF CHEMICAL FROM USE

The notified chemical will be used within ink products which will be bound to substrates once dried. The release of the notified chemical may occur from leakage of ink during use, installation or replacement of ink containers. Any releases are expected to be adsorbed onto a suitable material and collected for disposal, in accordance with local government regulations.

RELEASE OF CHEMICAL FROM DISPOSAL

Bulk containers are expected to contain residue which accounts for approximately 2% of the import volume which will be disposed of in accordance with government regulations during the cleaning and recycling of bulk packaging.

Most of the notified chemical is expected to share the fate of the printed substrates to which it has been applied, either subjected to substrate recycling processes, or being disposed of to landfill at the end of their useful lives. As estimated by the notifier, printing on paper accounts for most of the import volume of the notified chemical. A recent Australian waste report states an average paper recycling rate of 60% (Blue Environment Ltd., 2016). In the worst case scenario, up to 60% of the import volume of the notified chemical could be released to the aquatic environment from paper recycling processes.

7.1.2. Environmental Fate

As a result of its use pattern, most of the notified chemical is expected to share the fate of the substrates to which it has been applied, either subjected to substrate recycling processes, or being disposed of to landfill at the end of their useful lives. Waste plastic items may be recycled, but eventually plastic items containing the notified chemical will be disposed of to landfill. In landfill, the notified chemical will be present as cured solids and will be neither bioavailable nor mobile.

During paper recycling processes, waste paper is repulped using a variety of chemical treatments which, amongst other things, enhance ink detachment from the fibres. Waste water from paper recycling processes containing the notified chemical is expected to be treated at an onsite wastewater treatment plant before potential release to sewers or surface waters.

Based on the log P_{ow} and its low water solubility, the notified chemical is expected to associate with the sludge in the wastewater treatment plant. The waste sludge containing the notified chemical will be sent to landfill for disposal or to agricultural land for remediation. The notified chemical is expected to bind to soil or sludge based on its predicted high log K_{oc} and low solubility in water. In landfill, soil, sludge and water, the notified chemical is inherently biodegradable according to manometric respirometry studies (> 30% degradation after 28 days) and is expected to eventually degrade via biotic and abiotic processes to form water and oxides of carbon.

The notified chemical is not expected to bioaccumulate based on a bioaccumulation factor (BCF) estimate of 7.7-23.3 L/kg wet-weight calculated using the log P_{ow} value (log $P_{ow} = 3.56$) in QSAR modelling (US EPA On-Line EPI SuiteTM v4.11 model BCFBAF v3.01).

Further study details are located in Appendix C.

7.1.3. Predicted Environmental Concentration (PEC)

The worst-case predicted environmental concentration (PEC) has been calculated to assume 100% of the import volume of the notified chemical will be used on paper and cardboard substrates and 60% of this would be potentially released to sewers through paper recycling processes. As paper recycling occurs at facilities located throughout Australia, it is anticipated that such releases will occur over 260 working days per annum into the Australian effluent volume. It is also assumed under the worst-case scenario that there is no removal of the notified chemical during wastewater treatment processes.

Predicted Environmental Concentration (PEC) for the Aquatic Compartment		
Total Annual Import/Manufactured Volume	20,000	kg/year
Proportion expected to be released to sewer	60%	
Annual quantity of chemical released to sewer	12,000	kg/year
Days per year where release occurs	260	days/year
Daily chemical release:	46.15	kg/day
Water use	200	L/person/day
Population of Australia (Millions)	24.386	million
Removal within STP	0%	
Daily effluent production:	4,877	ML
Dilution Factor - River	1.0	
Dilution Factor - Ocean	10.0	
PEC - River:	9.46	μg/L
PEC - Ocean:	0.95	μg/L

The predicted concentration of the notified chemical in soils was calculated using worst-case SimpleTreat STP modelling (Struijs et al. 1991) which assumes a 92% removal rate during sewage treatment, based on the physical and chemical properties of the notified chemical. Partitioning to biosolids in STPs Australia-wide may result in an average biosolids concentration of 15.141 mg/kg (dry weight). Biosolids are applied to agricultural soils, with an assumed average rate of 10 t/ha/year. Assuming a soil bulk density of 1,500 kg/m³ and a soil-mixing zone of 10 cm, the concentration of the notified chemical may approximate 0.101 mg/kg in applied soil. This assumes that degradation of the notified chemical occurs in the soil within 1 year from application. Assuming accumulation of the notified chemical in soil for 5 and 10 years under repeated biosolids application, the concentration of notified chemical in the applied soil in 5 and 10 years may approximate 0.505 mg/kg and 1.01 mg/kg, respectively.

7.2. Environmental Effects Assessment

The results from ecotoxicological investigations conducted on the notified chemical are summarised in the table below. Details of these studies can be found in Appendix C.

Endpoint	Result	Assessment Conclusion	
Fish Toxicity (acute)	Not determined at limit of water solubility (0.19 mg/L)	Not acutely toxic to fish to the limit of water solubility	
Fish toxicity (chronic)	Not determined at limit of water solubility	Not chronically toxic to fish	
Daphnia Toxicity	Not determined at limit of water solubility	Not acutely toxic to invertebrates	
Algal Toxicity	Not determined at limit of water solubility (0.17 mg/L)	Not acutely toxic to algae	
Inhibition of Bacterial Respiration	EC50 > 100 mg/L	Not likely to be inhibitory to microbial activity	
Acute earthworm toxicity	> 1,000 mg/kg (dry soil)	Not toxic to earthworms	

Based on the above ecotoxicological endpoints for the notified chemical, it is not expected to be harmful to aquatic organisms. Therefore, the notified chemical is not formally classified under the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)* for acute and chronic toxicities (United Nations, 2009).

7.2.1. Predicted No-Effect Concentration

The Predicted No-Effect Concentration was not calculated as the notified chemical is not toxic at the limit of water solubility.

7.3. Environmental Risk Assessment

On the basis of no toxicity at the limit of water solubility, the notified chemical is not considered to pose an unreasonable risk to the aquatic environment. In addition, on the basis of low toxicity to earthworms, the notified chemical is not considered to pose unreasonable risk to the soil environments.

APPENDIX A: PHYSICAL AND CHEMICAL PROPERTIES

Glass Transition Temperature -56.3 °C

Method Differential thermal analysis

Remarks An accurately measured quantity of the notified chemical was placed in a container and the

quantity of heat absorbed during glass transition was measured. The test was conducted in a

nitrogen atmosphere.

Test Facility EniChem (1992a)

Boiling Point 220 – 245 °C at 67 Pa

Method Low pressure distillation with quantitative determination of the distillate

Remarks The notified chemical was heated at a vacuum of 133 Pa. The temperature in the heater was

increased up to 200 $^{\circ}$ C and the vacuum was further lowered to 67 Pa. The temperature was then increased by 2 $^{\circ}$ C/min until the boiling temperature for the sample was reached.

Fractions were collected and quantified.

Test Facility EniChem (1992b)

Density $D^{20}_4 = 939 \text{ kg/m}^3$

Method Similar to EC Council Regulation No 440/2008 A.3 Relative Density

Remarks Measurement of relative density using a Anton Paar K.G. DMA 46 digital micro-densimeter

Test Facility EniChem (1992c)

Vapour Pressure 1.663 × 10⁻¹ kPa at 20 °C

Method EEC Guideline N. L. 251 part A: Method A4

Remarks The static method was used. Test Facility Istituto Guido Donegani (1992a)

Water Solubility 0.33 mg/L at 25 °C

Method Similar to OECD TG 105 Water Solubility

Remarks Column Elution Method Test Facility EniChem (1992d)

Fat (or n-Octanol) Solubility 79.35%

Method EEC Guideline N. L. 251 part A: Method A7

Remarks Analytical Method: the test substance and the standard fat (Natec HB) were mixed in various

ratios (16 - 79% concentration of test substance in fat) and the solubility estimated by

checking the presence of either one or two phases.

Partition Coefficient $\log P_{ow} = 3.56$ at 25 °C (n-octanol/water)

Method Analytical Method: Three water/n-octanol ratios were saturated with the test substance at

25 °C. The water/n-octanol ratios used were 20/1, 10/1 and 10/2.

Remarks HPLC Method Test Facility EniChem (1992e)

Surface Tension 62.05 mN/m at 20 ± 0.5 °C

Method EEC Guideline N. L. 251 part A: Method A5

Remarks Concentration: 0.29 mg/L Test Facility Istituto Guido Donegani (1992b)

Adsorption/Desorption

 $\log K_{oc} = 5.0$ at 20 °C

- screening test

Method OECD TG 121 Estimation of the Adsorption Coefficient (Koc) on Soil and on Sewage

Sludge using High Performance Liquid Chromatography (HPLC)

Remarks Dead time t₀ was determined using thiourea and methanol/ 0.1M citrate-buffer mobile phase

was used.

Test Facility Istituto di Ricerche Biomediche (1997a)

Flash Point 229 ± 1 °C

Method EEC Guideline N. L. 251 part A: Method A9
Remarks SetaFlash Closed Cup tester was used.
Test Facility Istituto Guido Donegani (1992a)

Autoignition Temperature

 338 ± 2 °C

Method EEC Guideline N. L. 251 part A: Method A15

Remarks The notified chemical was injected into a uniformly heated 500 mL glass flask containing air

at a predetermined temperature to observe the lowest temperature at which autoignition

occurs.

Test Facility Istituto Guido Donegani (1992a)

Thermal sensitivity

No explosion observed

Method EEC Guideline N. L. 251 part A: Method A14

Remarks The test substance was heated in a steel tube with nozzle-plates of different diameters of

orifice that provide various degree of confinement to determine whether the test substance is

liable to explode under thermal stress.

Test Facility Istituto Guido Donegani (1992a)

Shock sensitivity

No explosion observed

Method EEC Guideline N. L. 251 part A: Method A14

Remarks The test substance after drying in a CaCl₂ desiccator was placed in a standard holder (die

device) and subjected to the shock of a falling hammer on a steel anvil. A drop-hammer of

10 kg was dropped on samples from a height of 0.4 m.

Test Facility Istituto Guido Donegani (1992a)

APPENDIX B: TOXICOLOGICAL INVESTIGATIONS

B.1. Acute Oral Toxicity – Rat

TEST SUBSTANCE Notified chemical

METHOD European Economic Community Guidelines - VI Amendment, Annex V,

Directive 84/449/EEC

Species/Strain Rat/Sprague Dawley Crl:CD (SD) BR Vehicle 0.5% methylcellulose (400 cP) in water

Remarks – Method Test substance was administered once by oral gavage. The post-treatment

observation period was 14 days.

Stability and concentration analysis of the test substance in the vehicle was

not conducted.

RESULTS

Group	Number and Sex of Animals	Dose (mg/kg bw)	Mortality
1	10 (5 F/5 M)	5,000	0/10
LD50	> 5,000 mg/kg bw		
Signs of Toxicity	Piloerection was o	bserved 2 hours after administ	tration of the test substance
	in 2 male and 3 occurred 4 hours a	female animals. Recovery of the treatment.	of all the treated animals
Effects in Organs	The mean body w	reight of all animals increase	d within the normal range
	throughout the stud	ly period.	
	There were no ma at the end of the ob	croscopic pathological finding oservation period.	gs in the animals sacrificed
Remarks – Results	No mortalities occ	urred	
CONCLUSION	The notified chemi	cal is of low acute toxicity via	a the oral route.
TEST FACILITY	Istituto di Ricerche	Biomediche (1991a)	

B.2. Acute Dermal Toxicity – Rat

TEST SUBSTANCE Notified chemical

METHOD European Economic Community Guidelines - VI Amendment, Annex V,

Directive 84/449/EEC

Species/Strain Rat/Sprague Dawley Crl:CD (SD) BR

Vehicle None

Type of dressing Semi-occlusive

Remarks – Method Test substance used as supplied and a single dose was applied uniformly to

the skin. The post-treatment observation period was 14 days.

RESULTS

Group	Number and Sex of Animals	Dose (mg/kg bw)	Mortality
1	10 (5 F/5 M)	2,000	0/10

LD50 > 2,000 mg/kg bw

Signs of Toxicity – Local No signs of local toxicity were observed No signs of systemic toxicity were observed

Effects in Organs The mean body weight of all animals increased within the normal range

throughout the study period.

There were no macroscopic pathological findings in the animals sacrificed

at the end of the observation period.

Remarks – Results No mortality or clinical signs of toxicity in animals treated with the test

substance were observed.

CONCLUSION The notified chemical is of low acute toxicity via the dermal route.

TEST FACILITY Istituto di Ricerche Biomediche (1991b)

B.3. Acute Inhalation Toxicity – Rat

TEST SUBSTANCE Notified chemical

METHOD OECD TG 403 Acute Inhalation Toxicity – Limit Test

Species/Strain Sprague-Dawley rats

Vehicle None

Method of Exposure Oro-nasal exposure

Exposure Period 4 hours
Physical Form Liquid aerosol

Particle Size < 3.5 µm (94% of test aerosol particles)

Remarks – Method Nominal calculation assumed that relative test substance density equals 1.

RESULTS

Group	Number and Sex of Animals	Concentration (mg/L)		Mortality
		Nominal	Actual	
1	10 (5 F/5 M)	87.85	4.07	0/10
2	10 (5 F/5 M)	70.14	7.53	0/10

LC50 (4 hours) > 7.53 mg/L

Signs of Toxicity An unkempt appearance was noted for all Group 1 animals immediately

after exposure to the notified chemical. One animal in Group 2 appeared

subdued and showed hunched posture for 24 hours after exposure.

Effects in Organs Slightly mottled lungs in all but 2 animals in Group 2 were observed. Pale

and discoloured lungs were noted in 1 female and 1 male in Group 2. The study authors deemed these changes to be in accordance with normal background findings in acute rat studies at the test facility and not

attributable to the test substance.

There were no other macroscopic pathological findings in the animals

sacrificed at the end of the observation period.

Remarks – Results No mortalities occurred

CONCLUSION The notified chemical is of low acute toxicity via inhalation.

TEST FACILITY IRI (1991)

B.4. Skin Irritation – Rabbit

TEST SUBSTANCE Notified chemical

METHOD European Economic Community Guidelines - VI Amendment, Annex V,

Directive 84/449/EEC

Species/Strain Rabbit/New Zealand White

Number of Animals
Vehicle
Observation Period
Type of Dressing
Occlusive

Remarks – Method Test substance was used undiluted

RESULTS

Lesion		an Sco nimal N		Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period
	1	2	3	_		-
Erythema/Eschar	0	0	0	1	< 24 h	0
Oedema	0	0	0	0	_	0

^{*} Calculated on the basis of the scores at 24, 48, and 72 hours for EACH animal

Remarks – Results Slight erythema (grade 1) was observed in all treated animals 1 hour after

patch removal.

No other dermal reactions were noted at the 24-72 hour observations in

any animal.

CONCLUSION The notified chemical is slightly-irritating to the skin.

TEST FACILITY Istituto di Ricerche Biomediche (1991c)

B.5. Eye Irritation – Rabbit

TEST SUBSTANCE Notified chemical

METHOD European Economic Community Guidelines-VI Amendment, Annex V,

Directive 84/449/EEC

Species/Strain Rabbit/New Zealand White

Number of Animals 3
Observation Period 7

Observation Period 72 hours
Remarks – Method Test substance was used undiluted and as supplied

RESULTS

Lesion	Mean Score* Animal No.		Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period	
	1	2	3			
Conjunctiva – Redness	0	0	0	1	< 24 h	0
Conjunctiva – Chemosis	0	0	0	0	_	0
Conjunctiva – Discharge	0	0	0	0	_	0
Corneal Opacity	0	0	0	0	_	0
Iridial Inflammation	0	0	0	0	_	0

^{*} Calculated on the basis of the scores at 24, 48, and 72 hours for EACH animal

Remarks – Results No clinical signs of toxicity were noted in the treated animals.

Locally induced slight conjunctival redness (grade 1) was observed in all animals 1 hour after administration of the test substance.

annuals I nour arter administration of the test substance.

No other ocular reactions were noted at the 24-72 hour observations in

any animal.

No evidence of epithelial defects were noted in any of the treated animals.

CONCLUSION The notified chemical is slightly-irritating to the eye.

TEST FACILITY Istituto di Ricerche Biomediche (1991d)

B.6. Skin Sensitisation – Guinea Pig, Buhler test

TEST SUBSTANCE Notified chemical

METHOD OECD TG 406 Skin Sensitisation – Buhler test (1981)

Species/Strain Guinea pig (male)/Dunkin Hartley albino
PRELIMINARY STUDY Maximum non-irritating concentration:

Topical: 100%

MAIN STUDY

Number of Animals Test Group: 10 Control Group: 10

Vehicle None

Positive Control Not conducted in parallel with the test substance

INDUCTION PHASE Induction concentration: Topical: 100%

Signs of Irritation No signs of irritation observed in any treated animals

CHALLENGE PHASE

1st Challenge Topical: 100%

Remarks – Method Test substance was used undiluted and applied topically by occlusive patch.

RESULTS

Animal	Challenge Concentration	Number of Animals Showing Skin Reactions after Challer	
		24 h	48 h
Test Group	100%	0/10	0/10
Control Group	0%	0/10	0/10

Remarks – Results No animal treated with the test substance showed positive reactions during

the challenge phase.

CONCLUSION There was no evidence of reactions indicative of skin sensitisation to the

notified chemical under the conditions of the test.

TEST FACILITY Istituto di Ricerche Biomediche (1992a)

B.7. Repeat Dose Oral Toxicity – Rat

TEST SUBSTANCE Notified chemical

METHOD OECD TG 407 Repeated Dose 28-day Oral Toxicity Study in Rodents

(1981)

EEC Guidelines (EEC Directive 84/449-Annex 5 to EEC Directive 79/831)

Species/Strain Sprague Dawley Crl:CD (SD) BR

Route of Administration Oral – gavage

Exposure Information Total exposure days: 28 days
Dose regimen: 7 days per week

Post-exposure observation period: 28 days (recovery)

Vehicle Corn oil

Remarks – Method Analyses of the stability and concentration of the formulated test substance

were performed.

RESULTS

Group	Number and Sex of Animals	Dose (mg/kg bw/day)	Mortality
Control	10 (5 F/5 M)	0	0/10
Low Dose	10 (5 F/5 M)	10	1/10
Mid Dose	10 (5 F/5 M)	100	0/10
High Dose	10 (5 F/5 M)	1,000	1/10
Control Recovery*	10 (5 F/5 M)	0	0/10
High Dose Recovery*	10 (5 F/5 M)	1,000	0/10

^{*} Control Recovery Group and High Dose Recovery Group were combined with Control Group and High Dose Group respectively in the treatment period.

Mortality and Time to Death

One female in the low dose group and one male in the high dose group died before the end of the treatment

period due to incorrect administration of the test substance into the lungs.

Clinical Observations

No clinical changes were noted in mid and low dose groups.

In the high dose group, episodes of salivation were observed after the administration in some rats of both sexes starting from the third week of the study till the end of the administration period.

One female in the high dose group had fur loss between the second and third week of treatment. This was considered by the study authors as incidental and unrelated to the treatment.

There were no reported treatment related changes on body weights or food consumption in the test animals.

Laboratory Findings – Clinical Chemistry, Haematology, Urinalysis
There were no treatment related adverse effects on clinical chemistry reported.

The study authors noted from an evaluation of the haematological data that there was a decrease in the leucocyte number in males in all treatment groups and in females in the high dose group. This change did not reach statistical significance during the treatment period. After 28 days recovery, the leucocyte number in treated animals of both sexes was still reduced in comparison to the control recovery group and reached statistical significance in females in the high dose recovery group.

A slight increase in the specific gravity of urine were reported in all treated males that reached statistical significance in the mid and high dose groups. Urinalysis revealed a slight increase in the frequency of urinary leucocytes in some males and females in the high dose group. This increase in urinary leucocytes, coincident with decrease in blood leucocytes, was still evident in the high dose recovery group after 28 days without treatment.

Effects in Organs

Statistically significant increase in mean absolute and relative liver weights in males in the high dose group (116% of absolute organ weight compared to control group) were reported. In females of the same group a slight increase in the liver weights was also noted. The increase in liver weights was associated with dose related hepatic centrilobular hypertrophy, indicative of hepatic functional changes. However, the study authors reported that there were no statistically significant changes in the liver enzyme alkaline phosphatase in either sex. Animals in the recovery groups were fully recovered at the end of the recovery period. The study authors considered the changes in the liver to be adaptive in origin.

Remarks - Results

Oral administration of the test substance to rats for a period of 28 consecutive days at dosages of 10, 100 and 1,000 mg/kg bw/day resulted in some treatment related effects as noted above. The study authors considered these changes likely to be adaptive. A no observed effect level (NOEL) was regarded to be 10 mg/kg bw/day for both sexes.

CONCLUSION

The study authors concluded that the NOEL was 10 mg/kg bw/day in the repeated dose oral toxicity study based on the liver and leucocyte effects observed at 50 mg/kg bw/day and above.

TEST FACILITY Istituto di Ricerche Biomediche (1992b)

B.8. Genotoxicity – Bacteria

TEST SUBSTANCE Notified chemical

METHOD OECD TG 471 Bacterial Reverse Mutation Test (1981)

Plate incorporation procedure

Species/Strain Salmonella typhimurium: TA1535, TA1537, TA1538, TA98, TA100

Metabolic Activation System Aroclor 1254 induced rat liver S9 mix

Concentration Range in a) With metabolic activation: 9.3 - 93,000 μ g/plate Main Test b) Without metabolic activation: 9.3 - 93,000 μ g/plate

Vehicle Water (for serial dilutions)

Remarks - Method

No preliminary test was conducted. The test substance was assayed undiluted and at 4 serial 1 in 10 dilutions (1:10, 1:100, 1:1,000, 1:10,000) using water. The density of the test substance is 0.93 g/cm³ and resulted in a test concentration range of $9.3-93,000~\mu g/plate$ for the serially diluted solutions.

The main test was conducted in duplicate and the test substance was added to both base-pair substitution type (TA100 and TA1535) and frameshift type (TA98, TA1537 and TA1538) tester strains.

Tests with negative control and positive controls were run concurrently.

Positive controls were:

- With metabolic activation: 2-Aminofluorene (TA1538, TA98 and TA100)
- Without metabolic activation: hydrazine sulphate (TA1535); 9aminoacridine HCl monohydrate (TA1537), doxorubicine HCl (TA1538, TA98, TA100).

The negative control was acetone.

No major deviations from the test guideline were reported.

RESULTS

Metabolic	Test Substance	Concentration (µg/plate) Re	esulting in:
Activation	Cytotoxicity in Test	Precipitation*	Genotoxic Effect
Absent			
Test 1	Not reported	Not reported	Negative
Test 2	Not reported	Not reported	Negative
Present		-	
Test 1	Not reported	Not reported	Negative
Test 2	Not reported	Not reported	Negative

^{*} Based on the physical and chemical properties (Appendix A), the solubility of the notified chemical in the vehicle (water) is 0.33 mg/L at 25 °C.

Remarks - Results

The test substance at any tested concentrations did not result in an increase of more than twice the number of revertant colonies in comparison to the negative control. No dose-related response was observed in any test strains with or without metabolic activation.

The positive and negative controls provided a satisfactory response confirming the validity of the test system.

CONCLUSION

The notified chemical was not mutagenic to bacteria under the conditions of the test.

TEST FACILITY

Istituto di Ricerche Biomediche (1991e)

B.9. Genotoxicity – In Vitro Mammalian Chromosome Aberration Test

TEST SUBSTANCE Notified chemical

METHOD OECD TG 473 In vitro Mammalian Chromosome Aberration Test (1981)

EC Directive 92/69/EEC and 67/548/EEC B.10 Mutagenicity - In vitro

Mammalian Chromosome Aberration Test (1992)

Species/Strain Hamster

Cell Type/Cell Line Chinese hamster ovary cells (CHO)
Metabolic Activation System Aroclor 1254 induced rat liver S9 mix

Vehicle Acetone

Remarks - Method

The preliminary cytotoxicity test with and without metabolic activation was performed with a concentration range of $5 - 5{,}000 \,\mu\text{g/mL}$.

At the dosage levels of 500, 1,500 and 5,000 μ g/mL, the test substance was cytotoxic both with and without metabolic activation, resulting in very few metaphases on the slides at harvesting.

Based on the preliminary cytotoxicity test, the concentrations 15, 50 and $150 \mu g/mL$ were selected for metaphase analysis in the main tests, with and without metabolic activation.

Ethylmethane sulphonate (EMS) and cyclophosphamide (CP) were used as positive controls. The vehicle was used as the negative control.

No major deviations from the test guideline were reported.

Metabolic Activation	Test Substance Concentration (µg/mL)	Exposure Period	Harvest Time
Absent			
Preliminary Test	5, 15, 50, 150, 500, 1500, 5000	3 h	20 h
Main Test 1	15*, 50*, 150*	3 h	20 h
Main Test 2	15*, 50*, 150*	18 h	20 h
Main Test 3	150*	24 h	44 h
Present			
Preliminary Test	5, 15, 50, 150, 500, 1500, 5000	3 h	20 h
Main Test 1	15*, 50*, 150*	3 h	20 h
Main Test 2	15*, 50*, 150*	3 h	20 h
Main Test 3	150*	24 h	44 h

^{*} Cultures selected for metaphase analysis.

RESULTS

Metabolic	Tex	st Substance Concentra	ation (µg/mL) Resultin	g in:
Activation	Cytotoxicity in	Cytotoxicity in	Precipitation	Genotoxic Effect
	Preliminary Test	Main Test		
Absent				
Preliminary Test	≥ 500	_	≥ 500	Not tested
Main Test 1	_	> 150	> 150	Negative
Main Test 2	_	> 150	> 150	Negative
Main Test 3	_	> 150	> 150	Negative
Present				
Preliminary Test	≥ 500	_	≥ 500	Not tested
Main Test 1	_	> 150	> 150	Negative
Main Test 2	_	> 150	> 150	Negative
Main Test 3	_	> 150	> 150	Negative

Remarks - Results

In the preliminary toxicity test when the test article was added to the incubation mixture, visible droplets formed at concentrations $\geq 500~\mu g/mL$ of the test substance. At concentrations $\leq 150~\mu g/mL$ small droplets of the test substance distributed throughout the incubation mixture were visible under microscope.

The test substance did not induce any statistically significant increases in the frequency of cells with chromosome aberrations either in the absence or presence of metabolic activation.

The positive and negative (vehicle) controls provided a satisfactory response confirming the validity of the test system.

CONCLUSION

The notified chemical was not clastogenic to Chinese hamster ovary cells treated *in vitro* under the conditions of the test.

TEST FACILITY

Istituto di Ricerche Biomediche (1997b)

B.10. Genotoxicity – In Vitro Mammalian Cell Gene Mutation Test

TEST SUBSTANCE

Notified chemical

METHOD

OECD TG 476 In vitro Mammalian Cell Gene Mutation Test (1998)

Species/Strain

Mouse

Cell Type/Cell Line

L5178Y lymphoma cells

Metabolic Activation System

Aroclor 1254 induced rat liver S9 mix

Vehicle

Ethanol

Remarks - Method

Two preliminary cytotoxicity tests were performed to determine concentration range to be used in the main test. In the first test cells were exposed to the test substance for 4 hours at a concentration range of 0.5 – 5,000 µg/mL in the absence and presence of metabolic activation. In the second test, cells were exposed for 24 hours at a concentration range of 0.25 – 2,500 μg/mL of the test substance in the absence of metabolic activation.

Based on the results of the preliminary toxicity assay, the concentration range chosen for Main Test was 5 to 150 μg/mL, in both the presence and absence of metabolic activation.

Methyl methanesulfonate (MMS) was used as the positive control for the tests in the absence of metabolic activation. In the presence of metabolic activation 7,12-Dimethyl-benz(a)anthracene (7,12 ZDMBA) was used as the positive control. The vehicle (ethanol) was use as the negative control.

In the study, the negative control mutant frequency was 110 mutants per 10⁶ clonable cells for 4 hour exposure in the absence of metabolic activation. The study authors reported that this deviation had no adverse effect on the integrity or conclusions of this study.

Metabolic	Test Substance Concentration (μg/mL)	Exposure	Expression	Selection
Activation		Period	Time	Time
Absent				
Preliminary Test 1	0.5, 1.5, 5, 15, 50, 150, 500, 1500, 5000	4 h	2 d	10 - 14 d
Preliminary Test 2	0.25, 0.75, 2.5, 7.5, 25, 75, 250, 750, 2500	24 h	2 d	10 - 14 d
Main Test 1	50*, 75*, 100*, 125*, 150*	4 h	2 d	10 - 14 d
Main Test 2	3.75*, 7.5*, 18.75*, 37.5*, 75*, 187.5	24 h	2 d	10 - 14 d
Present				
Preliminary Test 1	0.5, 1.5, 5, 15, 50, 150, 500, 1500, 5000	4 h	2 d	10 - 14 d
Main Test 1	50*, 75*, 100*, 125*, 150*	4 h	2 d	10 – 14 d

^{*} Cultures selected for colony analysis.

RESULTS

Metabolic	Tes	st Substance Concentra	ation (µg/mL) Resultin	g in:
Activation	Cytotoxicity in	Cytotoxicity in	Precipitation	Genotoxic Effect
	Preliminary Test	Main Test	-	
Absent				
Preliminary Test	> 5,000	_	≥ 150	Not tested
Preliminary Test	> 2,500	_	≥ 250	Not tested
Main Test 1	_	> 150	≥ 150	Equivocal*
Main Test 2	_	> 75	≥ 75	Negative
Present				
Preliminary Test	> 5,000	_	≥ 150	Not tested
Main Test 1	_	> 150	≥ 150	Negative

^{*} Equivocal results were only observed at 125 μg/mL dose level.

Remarks – Results One culture tested at 125 µg/mL dose level without metabolic activation

exhibited a mutant frequency significantly higher than that of the vehicle control. No dose-response trend was observed. As the results were equivocal, an independent repeat assay was performed for a 24 hour exposure period only in the absence of metabolic activation. The repeat

assay (Main Test 2) showed negative results.

The positive and negative (vehicle) controls provided a satisfactory

response confirming the validity of the test system.

CONCLUSION The notified chemical was not mutagenic to L5178Y/TK+/- mouse

lymphoma cells treated in vitro under the conditions of the test.

TEST FACILITY BioReliance (2003)

B.11. Genotoxicity - Rat, In Vivo Micronucleus Induction in Bone Marrow Cells

TEST SUBSTANCE Notified chemical

METHOD OECD TG 474 Mammalian Erythrocyte Micronucleus Test (1981)

Species/Strain Sprague Dawley Crl:CD (SD) BR

Route of Administration Oral – gavage

Vehicle 0.5% concentration methylcellulose water solution (0.5% MC)

Remarks – Method Positive control was mitomycin C.

The vehicle control and the test substance were administered by oral gavage, while the positive control was administered by the intraperitoneal

route.

Group	Number and Sex of Animals	Dose (mg/kg bw)	Sacrifice Time (hours)
Vehicle control	30 (15 F/15 M)	20 a	18 h, 42 h, 66 h ^b
Test substance	30 (15 F/15 M)	5,000	18 h, 42 h, 66 h ^b
Positive control, M	10 (5 F/5 M)	8	42 h

M = mitomycin C.

RESULTS

Doses Producing Toxicity No cytotoxic effects on bone marrow cells were observed at a dose of

5,000 mg/kg bw. No clinical signs of toxicity were reported.

Genotoxic Effects Negative

Remarks – Results The positive and vehicle controls provided a satisfactory response

confirming the validity of the test system.

It was noted that the study authors did not determine if the test substance

reached the bone marrow of the treated rats.

The test substance did not induce any statistically significant increase in the frequency of micronucleated cells in the bone marrow under the test

conditions.

CONCLUSION The study authors reported that the notified chemical was not clastogenic

under the conditions of this in vivo micronucleus test.

TEST FACILITY Istituto di Ricerche Biomediche (1991f)

^a Vehicle control administered was 20 mL/kg bw

^b Animals were sacrificed at 3 time intervals (18 h, 42 h and 66 h). At each time interval 10 animals treated with the test substance or negative control were sacrificed.

B.12. Toxicity to Reproduction – Rat, One Generation Study

TEST SUBSTANCE Notified chemical

METHOD OECD TG 415 One-Generation Reproduction Toxicity Study (1981)

Species/Strain Rat/Sprague Dawley Crl:CD (SD) BR

Route of Administration Oral – gavage

Exposure Information Exposure period – female: From 14 days pre-mating to the end of lactation

Exposure period – male: From 70 days pre-mating to the end of mating)

Vehicle Com oil

Remarks – Method The dosages were selected based on a previous 28 day repeated oral dose

toxicity study in rats. The highest dose corresponds to the maximum tolerated dose and the lowest dose is the no observed effect level (NOEL)

established in the study.

The test substance was administered to 30 male rats (parental, F0) per group for approximately 70 days covering pre-mating and mating, and to 30 female rats (parental, F0) per group from 14 days prior to mating, during pregnancy and during lactation (for approximately 58 days).

Analyses of the stability and concentration of the formulated test substance were performed.

RESULTS

Group	Number and Sex of Animals	Dose (mg/kg bw/day)	Mortality
Control	60 (30 F/30 M)	0	0/30
Low Dose	60 (30 F/30 M)	10	1/30
Mid Dose	60 (30 F/30 M)	50	0/30
High Dose	60 (30 F/30 M)	1,000	1/30

Mortality and Time to Death

One female rat in the high dose group died owing to difficult parturition (dystocia) and another female in the low dose group died before the end of the treatment period due to incorrect administration of the test substance.

Effects on Parental (P) animals:

No clinical signs or behavioural changes were noted in any experimental group during the pre-mating, mating, gestation and lactation periods.

No differences were noted in the mating and fertility indices nor in the mean mating time among the different experimental groups.

No body weight gain changes observed in treated males compared to control males during pre-mating. Female body weight gains were slightly reduced during the pre-mating period in the high dose group and statistically significantly reduced during the gestation and lactation in the mid and high dose groups. The body weight reductions in the females were associated with reduced food consumptions.

No interferences were found on parental reproductive performance and no effects were observed on the weight of the gonads. The absolute weights of testes were significantly increased in males of the high dose group while the relative weights were similar in all experimental groups. No treatment-related changes were seen histologically either in testes or in the epididymitis of males in the high dose group. The weights of ovaries in females of the high dose group were slightly lower than that of the control females, without reaching statistical significance.

No dams with late resorptions, 100% resorptions or dead foetuses were observed in any experimental group. In females of the high dose group, the frequency of early resorptions was statistically significantly higher compared to control females. An increase in number of still births with a related decrease in number of live births was also observed. For live foetuses, both the total number per group and the mean number per litter were significantly lower in the high dose group compared to controls. The length of parturition was slightly increased. Difficult parturition was also observed in one female in this dose group. The study authors also noted an apparent increase

in frequency of female foetuses in necropsy which they did not consider to be treatment related. No effects were reported on the postnatal survival and development of the first filial generation (F1) live pups.

Effects on 1st Filial Generation (F1)

One pluri-malformed foetus was observed at the external examination in the high dose group, having ablefaria, acrania, exencephaly, exophthalmia and macrophthalmia. One foetus with hydroureter and related hydronephrosis was noted in the control group and 3 foetuses with hydroureter were found in the high dose group. A significant increase was observed in the frequencies per group of visceral variants in the high dose group, all related to the urinary tract. No skeletal malformations were found.

No significant changes were found in the mean body weight of pups from treated and control groups during the lactation and post-lactation periods.

Remarks – Results

No pathological changes were observed at the autopsy examination done on F0 parents and F1 pups.

The study authors considered that oral administration of the test substance to male rats during the pre-mating and mating periods and to female rats during the pre-mating, mating, gestation and lactation periods did not induce any apparent toxic effects in male animals. However, they noted that females in the mid and high dose groups had reduced mean body weight gain associated with reduced mean daily food consumption.

Maternal toxicity was present in females in the high dose group as increases in early resorptions and still births in this treatment group were observed.

No effects on postnatal survival and development of the F1 live pups were noted in the study.

CONCLUSION

The study authors concluded that a NOEL of 10 mg/kg bw/day may be regarded for F0 parents based on reduced body weight gain noted at 50 mg/kg bw/day and above. A NOEL of 50 mg/kg bw/day may be considered for F1 pups based on developmental effects observed at 1,000 mg/kg bw/day dose level.

TEST FACILITY

Istituto di Ricerche Biomediche (1998a)

APPENDIX C: ENVIRONMENTAL FATE AND ECOTOXICOLOGICAL INVESTIGATIONS

C.1. Environmental Fate

Contradictory results were reported between the modified MITI study and the manometric respirometry studies. HPLC analysis conducted in the modified MITI test showed an unknown peak which may be evidence of a degradant and confounded the results of this test. The two manometric respirometry studies returned similar results for biodegradability. Therefore the overall consideration for biodegradability of the notified chemical was based on the results from the manometric respirometry studies.

C.1.1. Ready Biodegradability

TEST SUBSTANCE Notified chemical

METHOD OECD TG 301 C Ready Biodegradability: Modified MITI Test (I)

Inoculum Mixed liquor suspended solid

Exposure Period 28 days Auxiliary Solvent None

Analytical Monitoring BOD and HPLC

Remarks – Method As per OECD test guidelines. No deviations to the test guideline were

noted.

RESULTS

Test	Substance	1	Aniline
Day	% Degradation	Day	% Degradation
7	0	7	62
14	0	14	71
28	0	28	71

Remarks - Results

All validity criteria were met. Reference substance reached 62% after 7 days and 71% after 14 days, and the difference in extremes of the test substances was less than 20% at Day 10.

Oxygen consumption in the control test was 6.7 mg/L at Day 28, it is noted

that this is outside of the expected 20 - 30 mg/L range.

An additional peak was detected during the HPLC analysis of the test

concentrations.

CONCLUSION The notified chemical is not biodegradable under the conditions of the

modified MITI test. However, the test substance may have been modified

under the study conditions.

TEST FACILITY Mitsubishi Chemical Safety Institute Ltd. (2001)

C.1.2. Ready Biodegradability

TEST SUBSTANCE Notified chemical

METHOD OECD TG 301 F Manometric Respirometry

Inoculum Activated sludge

Exposure Period 28 days Auxiliary Solvent None

Analytical Monitoring Biochemical Oxygen Demand (BOD)

Remarks – Method As per OECD guidelines. No deviations to the test guideline were noted.

RESULTS

Test Substance		Sodium benzoate		
Day	Day % Degradation		% Degradation	
7	8.75	7	71.6	
14	18.3	14	81.2	
21	30.5	21	86.2	
28	36.2	28	87.9	

Remarks - Results

Most validity criteria were met. The reference substance reached 81.2% degradation after 14 days. The difference in replicate extremes of the test substance was less than the 20% at Day 10.

It is noted that oxygen consumption in the inoculum blank was slightly above 60 mg/L limit (mean 60.8 mg/L); however this does not invalidate the test.

CONCLUSION

The notified chemical is inherently biodegradable (36.2%) under the conditions of the manometric respirometry test.

TEST FACILITY

C.1.3. Ready Biodegradability

TEST SUBSTANCE Notified chemical

METHOD OECD TG 301 F Manometric Respirometry

Inoculum Unspecified Exposure Period 28 days Auxiliary Solvent None

Analytical Monitoring Chemical Oxygen Demand (COD)

Remarks – Method As per OECD guidelines. No deviations to the test guideline were noted.

Huntingdon Life Sciences Ltd. (1998)

RESULTS

Test	Test Substance		Sodium Benzoate		
Day	% Degradation	Day	% Degradation		
5	0	5	75.4		
9	0.4	9	89.7		
14	6.9	14	90.0		
23	32.0	23	96.5		
28	34.5	28	96.8		

Remarks - Results

Control sample data were not provided, and therefore not all of the validity criteria could be verified.

The following validity criteria were verified:

- The difference in extremes of the test substance was less than 20% at Day 10.
- Reference substance reached 75.4% degradation after 5 days and 90% after 14 days.

CONCLUSION

The notified chemical is inherently biodegradable (34.5%) under the conditions of the manometric respirometry test.

TEST FACILITY

Istituto Guido Donegani (1992c)

C.2. Ecotoxicological Investigations

C.2.1. Acute Toxicity to Fish

TEST SUBSTANCE Notified chemical

METHOD OECD TG 203 Fish, Acute Toxicity Test – semi-static

EC Council Regulation No 440/2008 C.1 Acute Toxicity for Fish - semi-

static

Species Cyprinus carpio
Exposure Period 96 hours
Auxiliary Solvent None

Water Hardness 180 mg CaCO₃/L Analytical Monitoring Ultra HPLC (UPLC)

Remarks - Method As per OECD test guidelines. No deviations to the test guideline were

noted.

Water was renewed daily.

Oversaturation was observed when attempting to create a water accommodated fraction (WAF) of 10 mg/L, and therefore a WAF of 1.0 mg/L was used for this study. A reference test was conducted using

pentachlorophenol.

RESULTS

Concentrat	tion (mg/L)	Number of Fish		1	Mortalit	v	
Nominal	Actual		1 h	24 h	48 h	72 h	96 h
Control	0	7	0	0	0	0	0
1.0	0.19	7	0	0	0	0	0

 $LC50 > 0.19 \text{ mg/L (measured) at 96 hours} \\ NOEC (or LOEC) & 0.19 \text{ mg/L (measured) at 96 hours}$

Remarks – Results All validity criteria were met. Temperature was maintained at 22 °C, pH

was maintained within 1 unit and the dissolved oxygen concentration was maintained at > 60% of air saturation. Concentrations of the test substance

were maintained at > 80% of the nominal concentration.

Reference test concluded a 96 h LC50 of 0.24 mg/L.

CONCLUSION The notified chemical is not toxic to fish at the limit of water solubility.

TEST FACILITY WIL (2015a)

C.2.2. Acute Toxicity to Aquatic Invertebrates

TEST SUBSTANCE Notified chemical

METHOD OECD TG 202 Daphnia sp. Acute Immobilisation Test and Reproduction

Test – static

EC Council Regulation No 440/2008 C.2 Acute Toxicity for Daphnia -

static

Species Daphnia magna
Exposure Period 48 hours
Auxiliary Solvent None

Water Hardness 180 mg CaCO₃/L

Analytical Monitoring UPLC

Remarks – Method As per OECD guidelines. No deviations to the test guideline were noted.

Oversaturation was observed when attempting to create WAFs of 10 mg/L

and 100 mg/L, and therefore a WAF of 1.0 mg/L was used for this study.

A reference test was conducted using potassium dichromate.

RESULTS

TEST FACILITY

Concentrat	ion (mg/L)	Number of D. magna	Number Immobilised		
Nominal	Actual	·	24 h [acute]	48 h [acute]	
Control	0	20	0	1	
1.0	0.17	20	0 0		
LC50		> 0.17 mg/L at 24 hours > 0.17 mg/L at 48 hours			
NOEC (or LO	EC)	0.17 mg/L at 48 hours			
Remarks – Res	sults	All validity criteria were met. Th > 3 mg/L, pH was maintained at 8. $21-22$ °C			
		Reference test indicated an EC50 (of 0.41 mg/L (within the accepted r		nd an EC50 (48 h)	
CONCLUSION		The notified chemical is not toxic a	t the limit of water so	lubility.	

C.2.3. Chronic Toxicity to Aquatic Invertebrates

TEST SUBSTANCE Notified chemical

METHOD OECD TG 204 Fish, Prolonged Toxicity Test: 14-Day Study – semi-static

Species Brachydanio rerio

Exposure Period 21 days Auxiliary Solvent Acetone

Water Hardness Total hardness was 236 mg CaCO₃/L

WIL (2015b)

Analytical Monitoring Unspecified

Remarks – Method As per OECD guidelines when conducted (OECD TG 204 has been deleted

as of 2nd April 2014), test timeframe was extended from 14 days to 21 days.

Water was renewed daily.

Concentration (mg/L)		Number of Fish	Mortality			
Nominal	Actual		1 d	7 <i>d</i>	14 d	21d
Control	0	10	0	0	0	0
Control (solvent)	0	10	0	0	0	0
0.033	BDL	10	0	0	0	0
0.104	BDL	10	0	0	0	0
0.330	0.240	10	0	0	0	0

BDL = Below Detection limit

LC50 > 0.330 mg/L at 21 days based on nominal values.

NOEC (or LOEC) 0.240 mg/L at 21 days

content was maintained above 50% of air saturation value and substance

concentration was maintained throughout the test.

The concentrations in the nominal samples 0.033 and 0.104 could not be

confirmed as the concentration was below the detectable level.

CONCLUSION The notified chemical is not chronically toxic to fish.

TEST FACILITY Istituto di Ricerche Biomediche (1998b)

C.2.4. Algal Growth Inhibition Test

TEST SUBSTANCE Notified chemical

METHOD OECD TG 201 Alga, Growth Inhibition Test

EC Council Regulation No 440/2008 C.3 Algal Inhibition Test

Species Pseudokirchneriella subcapitata

Exposure Period 72 hours

Concentration Range Nominal: 1.0 mg/L

Actual: 0.17 mg/L

Auxiliary Solvent None

Water Hardness 240 mg CaCO₃/L

Analytical Monitoring UPLC

Remarks – Method Initial concentration of test substance was measured as 0.437 mg/L from a

nominal initial WAF of 1.0 mg/L and this is assumed to be the limit of

water solubility of the notified chemical.

A positive control was run using potassium dichromate.

RESULTS

Growth	rate	Yield		
ErC50	NOEC	EyC50	NOEC	
(mg/L at 72 h)	(mg/L)	(mg/L at 72 h)	(mg/L)	
> 0.17	0.17	> 0.17	0.17	

Remarks – Results The measured concentration deteriorated to 11% of the initial concentration

at the end of the study. Therefore a time weighted average was used to

determine the exposure concentration of 0.17 mg/L.

All validity criteria were met.

Control cell density increased by a factor of at least 16 per day. The coefficient of variation for both the section-by-section growth and average

specific growth rate was 18%.

CONCLUSION The notified chemical does not inhibit algal growth at the limit of water

solubility.

TEST FACILITY WIL (2015c)

C.2.5. Inhibition of Microbial Activity

TEST SUBSTANCE Notified chemical

METHOD OECD TG 209 Activated Sludge, Respiration Inhibition Test

EC Directive 88/302/EEC C.11 Biodegradation: Activated Sludge

Respiration Inhibition Test

Inoculum Activated sludge
Auxiliary solvent Tween 80
Exposure Period 30 minutes

Concentration Range Nominal: 3.2 – 100 mg/L

Remarks – Method A reference test was conducted using 3,5-dichlorophenol.

Deviations from the OECD test guidelines include the use of "Tween 80" as an emulsifier for the test substance. The samples were also aerated for

30 minutes rather than the specified 3 hours.

An upper range sample of 1,000 mg/L was not included in this test.

RESULTS

 $\begin{array}{ll} IC50 & > 100 \text{ mg/L} \\ NOEC & 100 \text{ mg/L} \end{array}$

Remarks – Results Test was repeated twice as validity criteria were not met. Only the third test

was reported which met all validity criteria. The coefficient of variation between control samples was 13.4% and the EC50 of the reference test was

12.2 mg/L.

Inhibition in the 10 mg/L sample could not be calculated as there was rapid

oxygen consumption in this sample.

CONCLUSION The notified chemical is not likely to be inhibitory to microbial activity

TEST FACILITY RCC UMWELTCHEMIE AG. (1993)

C.2.6. Acute Toxicity to Earthworms

TEST SUBSTANCE Notified chemical

METHOD Equivalent to OECD TG 207 Acute Earthworm Toxicity Test

Species Eisenia foetida

Exposure Period 14 days

Remarks – Method As per OECD guidelines. No deviations to the test guideline were noted.

RESULTS

EC50 > 1,000 mg/kg NOEC 1,000 mg/kg

Remarks - Results A limit test at a concentration of 1,000 mg/kg was conducted which

showed no mortality or abnormalities in either the treated group or the

control after the testing period.

CONCLUSION Notified chemical is not toxic to earthworms.

TEST FACILITY Istituto di Ricerche Biomediche (1998c)

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