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August 2010

NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

FULL PUBLIC REPORT

Z-76

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (Cwlth) (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 Ageing, 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, Water, Heritage and the Arts.

For the purposes of subsection 78(1) of the Act, this Full Public Report may be inspected at our NICNAS office by appointment only at Level 7, 260 Elizabeth Street, Surry Hills NSW 2010.

This Full Public Report is also 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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FULL PUBLIC REPORT

This assessment report is for an extension of original assessment certificate for Z-76. Based on the submission of new information by the extension notifier, some sections of the original assessment report have been modified. These modifications have been made under the heading 'Extension Application' in the respective sections.

Z-76

1. APPLICANT AND NOTIFICATION DETAILS

APPLICANT(S)

Lubrizol International, Inc. (ABN 52 073 495 603) 28 River Street Silverwater, NSW 2128

Applicant for an Extension of the Original Assessment Certificate:

Lubes Direct Pty Ltd (ABN 72 117 841 308)

174 Coreen Ave

Penrith NSW 2750

NOTIFICATION CATEGORY

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

EXEMPT INFORMATION (SECTION 75 OF THE ACT)

Data items and details claimed exempt from publication:

Chemical name, Other names, CAS number, Molecular formula, Structural formula, Molecular weight, Spectral data, Methods of detection and determination, Purity, Impurities, Additives/Adjuvants, Introduction volume, Details of use, and Identity of recipients.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT)

Variation to the schedule of data requirements is claimed as follows:

Dissociation constant, Particle size, and Flammability limits.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S)

None

NOTIFICATION IN OTHER COUNTRIES

The notified chemical is currently being notified globally by Lubrizol Inc.

2. IDENTITY OF CHEMICAL

MARKETING NAME(S)

Z-76

Extension Application: MOBIL 1 SYNTHETIC ATF (finished product containing the notified chemical at a concentration of <1%)

MOLECULAR WEIGHT

> 400 Da

ANALYTICAL DATA

Reference NMR, IR, UV spectra were provided.

3. COMPOSITION

DEGREE OF PURITY >80%

4. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AT 20°C AND 101.3 kPa: Clear amber liquid

Property	Value	Data Source/Justification
Pour Point	-8.15°C	Measured
Boiling Point	400 ± 0.5 °C at 101.72 kPa	Measured
Density	882 kg/m³ at 20°C	Measured
Vapour Pressure	5.7 x 10 ⁻¹⁰ kPa at 25°C	Measured
Water Solubility	$1.19 \times 10^{-4} - 7.0 \times 10^{-10} \text{g/L}$ at 25°C	Estimated
Hydrolysis as a Function of pH	Significant hydrolysis is unlikely to	Estimated based on its structure and
	occur in the environmental pH	the predicted low water solubility.
	range of 4-9.	
Partition Coefficient	log Pow = 3.86-9.24 at pH 3.3	Measured
(n-octanol/water)		
Adsorption/Desorption	$\log K_{oc} = 3.99-6.64$	Estimated
Dissociation Constant	Expected to be ionised throughout	Estimated based on its structure
	the environmental pH range of 4-9.	
Surface tension	Not determined	Based on its low water solubility
Particle Size	Not determined	The notified chemical is a liquid.
Flash Point	136 ± 2 °C at 101.52 kPa	Measured
Flammability Linit	NA Not determined	The notified chemical is a liquid.
Autoignition Temperature	344 ± 5 °C	Measured
Explosive Properties	Not explosive	Estimated based on chemical structure
Oxidising Properties	Not oxidising	Estimated based on chemical structure

DISCUSSION OF PROPERTIES

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

Reactivity

Stable under normal conditions of use.

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 initially be imported as a component of finished automotive transmission fluid (ATF) at concentrations of <1%. It is possible that additive concentrate containing 1-10% of the notified chemical will be imported for further formulation in Australia.

Extension Application:

The notified polymer will be imported into Australia at a concentration of <1% as an additive present in finished product and no reformulation will take place in Australia.

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

Year	1	2	3	4	5
Tonnes	0-5	0-5	0-5	0-5	0-5
Extension application					
Year	1	2	3	4	5
Tonnes	<1	<1	<1	<1	<1

PORT OF ENTRY

Fremantle, Brisbane, Melbourne and Sydney

IDENTITY OF RECIPIENTS

Lubrizol International Inc. (Silverwater, NSW)

TRANSPORTATION AND PACKAGING

The product containing the notified chemical will be imported in isotainers or 250 L drums. These will be then transported by truck or rail to end users or repackaging/formulation facility. The packaging size of the finished ATF product will be 250 L drums and 1 L plastic bottles.

Extension Application:

The product containing the notified chemical will be imported into Australia at <1% concentration in IBC, 208L drums, 20L packs, and small packs (<20L).

USF

The notified chemical is a friction modifier for use in the lubricant additive industry, primarily as automatic transmission fluids (ATF).

OPERATION DESCRIPTION

Formulation/blending

If blending occurs in the future, the additive concentrate containing 1 to 10% notified chemical will be transferred from storage to a blending area via forklifts and decanted from drums into blending tanks via either an automated pumping process or hand pumps. The blending process will be fully automated/enclosed and under local exhaust ventilation. The end products will be packaged automatically into containers ranging from drums for bulk shipment to large customers, such as original equipment manufacturers (OEMs), to smaller size plastic containers for aftermarket, garages or do-it-yourself (DIY) sales. Similar materials and products are blended in the same equipment, therefore, any residual material left in the blend tank or transfer lines remains for the next batch. Sampling will be conducted during the blending process. The equipment will be cleaned using mineral oil which will be recycled.

End use – bulk use

Initially, all ATF containing <1% notified chemical will be used by automobile manufacturers for factory fill operations (OEM use). The end product will be pumped from drums directly to the transmission through dedicated lines which will be an automated and enclosed process.

End use - non-bulk use

Initially, no ATF containing <1% notified chemical will be used for garages and do-it-yourself (DIY) use. During the possible future use (estimated to be minority), the end product will first be repackaged into smaller containers. The repackaging process will be automated, in which the end product will be pumped directly from the bulk container to the smaller bottles (plastic, 1 L).

Although some transmissions require the fluid to be replaced during servicing, many are now sealed units which are filled for the life of the transmission. These are expected to be serviced only by professional mechanics and often do not require replacement of ATF for the life of the transmission. When the replacement of ATF or 'topping off' the fluid level occurs, it is expected to be a manual process.

Extension Application:

The notified chemical will be imported into Australia at a concentration of <1% present as an additive in a finished product (ATF) only and no reformulation or repackaging will take place in Australia.

6. HUMAN HEALTH IMPLICATIONS

6.1 Exposure assessment

6.1.1 Occupational exposure

NUMBER AND CATEGORY OF WORKERS

Category of Worker	Number	Exposure Duration	Exposure Frequency
Category of worker	per site	(hours/day)	(days/year)
Transport and storage	2-3	1-3	4-6
Blending	1-2	1-3	10-20
Packaging	2-3	2-5	10-20
Repacking	1	1-3	10-20
End use	1-3	2-4	Variable

EXPOSURE DETAILS

Transport and storage

Exposure to the notified chemical (at a concentration of up to 10%) will be unlikely to occur, except in the event of an accidental spillage and breach of packaging.

Formulation

During formulation of the notified chemical into finished ATF products, worker exposure to the additive concentrate (maximum concentration of 10%) will be limited during transfer and mixing due to the enclosed and automated process. Workers may be exposed to the notified chemical (concentration up 1%) by skin and inhalation or ocular contact during sampling and equipment cleaning. However, exposure should be minimised by use of mechanical ventilation systems, automated processes and personal protective equipment (PPE).

End uses

Worker exposure during bulk end use is expected to be limited due to the enclosed and automated processes and use of mechanical ventilation systems and PPE.

Workers may be exposed to the notified chemical during non-bulk use of ATF containing <1% of the notified chemical. The estimated dermal exposure is 1.8 mg/day, based on the EASE model using following inputs: direct handling, intermittent contact, non-dispersive use, and assuming an average exposed surface areas of 1800 cm² for forearms and hands. Therefore, for a 70 kg worker and a 100% dermal absorption factor, systemic dermal exposure is estimated to be 0.026 mg/kg bw/day for using ATF containing <1% of the notified chemical. Ocular and inhalation exposure may also occur, however, the extent is expected to be low due to short exposure duration, infrequent uses and low volatility of the notified chemical (vapour pressure of 5.7 x 10^{-10} kPa at 25° C).

Extension Application:

MOBIL 1 SYNTHETIC ATF will be imported into Australia as a fully finished product containing <1% notified chemical and there will not be any reformulation or repackaging in Australia. Therefore, occupational exposure may only occur during transportation, storage and end use situations.

6.1.2. Public exposure

Public exposure to the finished ATF product containing <1% notified chemical via skin, optical, inhalation and potentially ingestion will be likely due to the manual application of the DIY products and the unlikely use of PPE. However, the public exposure is expected to be limited due to its infrequent use, assuming that most consumers do not change their own transmission fluid and this is an activity that would occur infrequently during the lifetime of the transmission.

Extension Application:

The notified chemical is intended for industrial use only and will not be sold to public. Therefore, public exposure is not expected.

6.2. Human health effects assessment

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

 Endpoint	Result and Assessment Conclusion
Rat, acute oral toxicity	LD50 >2000 mg/kg bw, low toxicity
Rat, acute dermal toxicity	LD50 >2000 mg/kg bw, low toxicity
Rabbit, skin irritation	severely irritating
Rabbit, eye irritation	slightly irritating
Mouse, skin sensitisation – local lymph node assay	evidence of strong sensitisation
Rat, repeat dose oral toxicity – 28 days	NOAEL = 25 mg/kg bw/day
Bacterial reverse mutation assay	non mutagenic
Chromosome aberration test – in vitro	non clastogenic

Toxicokinetics

No data on toxicokinetics, metabolism and distribution were available. The notified chemical is not expected to be readily bioavailable, as it is hydrophobic (log Pow = 3.86-9.24) and has a relatively high molecular weight (>400 Da). It has the potential to be absorbed across biological membranes, but the absorption of significant amounts of notified chemical is unlikely.

No evidence of dermal absorption was observed in the acute dermal toxicity study, however, dermal absorption would be necessary for the strong sensitisation reactions seen in the LLNA study (see below).

Given the systemic toxicity of the notified chemical in the repeated oral toxicity study, it is expected to be absorbed after an oral dose. Due to its surface-active nature, absorption is most likely to occur from the intestine, through micellar uptake into the lymphatic system. This conclusion is supported by the findings of the repeat dose oral toxicity study, where mucosal hypertrophy and vacuolation of the intestine and sinus histiocytosis of mesenteric lymph nodes and vacuolation of histiocytes were observed. The effect on the lymph nodes could be caused by the strong sensitisation nature of the notified chemical acting on the lymphatic tissues of the mesentery.

Given the hydrophobic nature of the notified chemical, any absorbed chemical is not expected to distribute significantly throughout the body; rather it would be predisposed to be bound to cellular membranes and to distribute into adipose tissue (EC, 2003). If exposure were continuous, the potential for bioconcentration in these regions could result in more severe effects than would be expected for the given exposure level. Following an oral exposure to the notified chemical, a wider distribution may be possible, as micelles of the notified chemical may be carried to the general circulation through lacteals and the thoracic duct.

Acute toxicity

The notified chemical showed no lethality in acute oral and dermal toxicity studies. No signs of systemic toxicity were observed during the study. However, signs of dermal irritation similar to the dermal irritation study (see below) were noted in the acute dermal toxicity study.

Irritation and sensitisation

The skin irritation study after 4 hours exposure showed well-defined erythema and slight oedema in all animals, which was recovered by Day 14. In addition, light brown discolouration of the epidermis with loss of skin elasticity, crust formation, and slight desquamation were observed in test animals at the 72-hour, 7-day, and 14-day observation, respectively. Similar skin reactions were also found in this study after 1 hour exposure and in the acute dermal study after 24 hours exposure. However, these effects were not observed after 3-minute exposure. Whilst the crust formation observed may indicate full thickness destruction of skin tissue, the lack of corrosive effects in the eye irritation study and the repeated dose oral study (see below) does not support the classification of Corrosive. The severity of the effect meets the hazard classification criteria (the Criteria) under the *Approved Criteria for Classifying Hazardous Substances* (NOHSC, 2004) as a skin irritant.

Slight eye irritation (minimal to moderate conjunctival irritations) was observed in all test animals, which was recovered by Day 7. No effects were found in the cornea and iris. The severity of the effect does not meet the Criteria for classification.

A LLNA test yielded high Stimulation Index (SI, 12.36, 20.98, and 29.13 for test concentrations of 2.5, 5 and 10%, respectively). According to Schneider and Akkan (2004), an Effective Concentration inducing a SI of >3 (EC₃) was calculated to be 0.7%, indicating that the notified chemical is a strong skin sensitiser. Analysis of the notified chemical against known structural alerts for skin sensitisers (Barratt *et al*, 1994) showed that it was homologous to one of the known sensitisers.

There is no evidence to exclude the possibility that the notified chemical may induce respiratory sensitisation after repeated inhalation exposure.

Repeated dose toxicity

A 28-day repeated dose toxicity study displayed systemic effects at 1000 mg/kg bw/day. These effects include increased salvation, decreased body weight gain and increased water consumption, haematological (indication of inflammation and anaemia) and clinical chemistry disturbances, and histological changes (mainly mucosal hypertrophy and vacuolation of the mucosal lamina propria in the duodenum, jejunum and ileum and sinus histiocytosis of the mesenteric lymph nodes and vacuolation of histiocytes). The histopathological changes and changes in water consumption and some of the haematological and clinical chemistry disturbances persisted in the recovery group. Although these effects were described as less severe at the 150 mg/kg bw/day dose level, they were still observed at this dose level.

The notified chemical is a moderate/severe skin irritant and strong skin sensitiser, and therefore has the potential to cause local effects which may or may not be reversible. The fact that the irritation/sensitization effects seen

with this chemical are severe/strong tends to suggest that the effects may not be readily reversible, and therefore could lead to longer term adverse effects. It is not known as to whether the effects observed in the intestine and in the mesenteric lymph nodes, which are likely to be a consequence of the irritant/sensitization properties of the chemical, are serious enough to lead to longer term health effects on prolonged exposure or whether the effects are an adaptive physiological response which is reversible. The study examined animals at the high dose level for 14 days after treatment. In the intestine, the mucosal hypertrophy was not observed but the vacuolation of the lamina propria cells was still apparent, although reduced. In the mesenteric lymph nodes, both the sinus histiocytosis and the vacuolation of histiocytes were both still present but reduced in severity. The reversibility of these changes at 150 mg/kg bw/day was not examined, however, given their reduced incidence and severity at this dose level, it is reasonable to assume that improvements, but possibly not absence of the effects, would be observed.

The morphological changes which were observed in the intestine particularly are unlikely to resolve quickly given the nature of irritation/sensitivity reactions and the results of the reversibility study, particularly in situations of repeated or prolonged exposure. Whether the observed changes, if not given the opportunity to recover, will lead to further damage to the intestine is difficult to predict and a longer term study may be required to address this uncertainty. The nature and properties of this chemical as evidenced from the results of the toxicological studies indicate that prolonged oral exposure may cause serious damage to health and, as such, the hazard classification R48/22 is warranted. The No Observed Adverse Effect Level (NOAEL) was established as 25 mg/kg bw/day in this study, based on absence of adverse health effect at this dose level.

The notified chemical did not induce mutations in bacterial test and failed to induce significant chromosomal aberrations in mammalian cells in vitro. These results suggest that the notified chemical is not likely to be mutagenic to humans.

Classification

Based on the available data, the notified chemical is classified as a hazardous substance in accordance with the NOHSC Approved Criteria for Classifying Hazardous Substances (NOHSC 2004). The following risk and safety phrases apply to the chemical:

R38 Irritating to skin (cut-off for classification $\geq 20\%$)

R43 May cause sensitisation by skin contact (cut-off for classification $\geq 1\%$)

R48/22 Harmful: danger of serious damage to health by prolonged exposure if swallowed (cut-off for classification $\geq 10\%$)

6.3. Human health risk characterisation

6.3.1. Occupational health and safety

Considering the intended use of the notified chemical the main routes of exposure for all types of workers are dermal and ocular. The major health concerns are skin irritation and sensitisation as well as systemic effects.

Risk of skin sensitisation

During formulation of the finished ATF products and before mixing, workers handling the notified chemical may be exposed to maximum concentration of 10% in the additive concentrate. Considering the hazardous nature of the notified chemical there is a risk of skin sensitisation for these workers. However, the risk is not considered to be high as handling of the concentrate will be limited to enclosed transferring process into a mixing tank. Following the enclosed mixing process, workers involved in the formulation and bulk end use processes will only handle product containing <1% of the notified chemical. The risk of skin sensitisation is expected to be low due to the enclosed and automated system. In addition, the risk of skin sensitisation will be further reduced by employment of safe work practices and the appropriate use of personal protective equipment (PPE) including appropriate aprons and gloves.

Non-bulk end use of the formulated products, namely addition or changing of gear oils, may result in frequent exposure to a range of products containing <1% of notified chemical. Although the concentration of the notified chemical is low, considering the skin sensitising potency of the notified chemical and the likely dermal exposure, the risk for skin sensitisation cannot be excluded, especially for highly sensitive individuals. Employers should implement all necessary control measures to minimise dermal exposure including carrying a warning with regard to the skin sensitising potency on the MSDS for the additive concentrate.

Risk of skin irritation

The risk of skin irritation is expected to be low for workers involved in formulation of products containing the notified chemical and bulk- end uses due to the enclosed/automated processes, low concentration of the notified chemical and use of appropriate PPE, such as skin protection.

Although the non-bulk end use may result in frequent exposure to the ATF product containing the notified chemical, the risk of irritation is considered low, as the concentration of the notified chemical is <1%.

Risk of systemic effects

Although ingestion is not a likely route of exposure at the occupational settings and low dermal absorption of the notified chemical is expected, the systemic effects observed in the repeated oral animal study cannot be completely ruled out following repeated dermal exposure to the notified chemical. However, the risk of the systemic effects for workers involving in the formulation and bulk end uses is expected to be low due to limited dermal exposure from the enclosed/automated processes and use of appropriate PPE use.

Based on a NOAEL of 25 mg/kg bw/day, derived from a 28-day rat oral study and the reasonable worst-case worker exposure estimation during non-bulk end uses, the margin of exposure (MOE) is calculated as 833. MOEs greater than or equal to 100 are considered acceptable to account for intra- and inter-species differences. Therefore, the risk of systemic effects based on the modelled data is acceptable for non-bulk end use workers who handle ATF products containing <1% of the notified chemical.

Other potential risks

The risk of eye irritation will be low for workers due to the low concentration of the notified chemical and the enclosed/automated processes in the majority of the uses.

Risk of respiratory sensitisation cannot be excluded due to the strong potency of the skin sensitisation. However, based on the very low vapour pressure, worker exposure via inhalation will be limited. Therefore, the risk is not expected to be high.

Overall, the main risk for workers handling products containing the notified chemical is related to skin sensitisation and irritation. Appropriate control measures should be in place to minimise dermal exposure.

Extension Application:

MOBIL 1 SYNTHETIC ATF will be imported into Australia as a fully finished product and there will not be any reformulation or repackaging in Australia. Therefore, risks associated with occupational exposure will only be to the product containing <1% notified chemical during transportation, storage, end use situations and considered acceptable.

6.3.2. Public health

ATF products containing <1% may be available to the public for DIY manual application in the future. During this process dermal and ocular exposure is likely, especially considering that members of the public are likely not to use PPE. Although the concentration of the notified chemical is low (<1%), considering the skin sensitising potency of the notified chemical and the likely dermal exposure, the risk for skin sensitisation cannot be excluded, especially for highly sensitive individuals. Advice to consumers with regard to the skin sensitisation potential needs to be highlighted on the label. The risk of skin and eye irritation as well as systemic effects is expected to be low due to its infrequent use and low concentration of the notified chemical.

Extension Application:

As the notified chemical is intended for industrial use only, public exposure is not expected to cause any risk.

7. ENVIRONMENTAL IMPLICATIONS

7.1. Environmental Exposure & Fate Assessment

7.1.1 Environmental Exposure

RELEASE OF CHEMICAL AT SITE

If reformulation of ATF occurs in the future, it is expected that this process will be highly automated with minimal release of the chemical. The residue in packing containers would be rinsed with oil for charging to the next batch. Similarly rinses from cleaning of equipment would be charged to the next batch.

RELEASE OF CHEMICAL FROM USE

Approximately 0.5% (<25 kg per annum) of the notified chemical is expected to remain in import containers as residue after repacking or filling of transmissions with the product.

Assuming that 25% (<1250 kg per annum) is used in top up applications and that 1% remains in these containers then a further maximum of 7.5 kg per annum will remain as residue in the repackaged product.

It is expected that only a small amount (<5%; <250 kg) of the ATF products would be released to the environment either from incorrect disposal from DIY enthusiasts and leaks from transmissions. This is likely to occur throughout Australia in a disperse manner.

Although some transmissions require the fluid to be replaced during servicing, many are now sealed units which are filled for the life of the transmission. These are expected to be serviced only by professional mechanics and often do not require replacement of the ATF for the life of the transmission. The ATF are expected to be collected either at the end of the useful life of the transmissions; or if required during servicing, and properly disposed of.

RELEASE OF CHEMICAL FROM DISPOSAL

Residues in import drums are expected to be cleaned out by licensed drum recyclers and properly disposed of (most likely by incineration).

Residue from the repackaged product is likely to be disposed of as domestic waste and deposited to authorised landfill.

Used ATF may be recycled, re-refined, burnt as low grade burner fuel or disposed of by incineration.

Transmissions which may not be fully drained of the product comprising the notified chemical are likely to be disposed of to landfill or undergo metal recycling at the end of their useful lives.

7.1.2 Environmental fate

For the details of the environmental fate studies please refer to Appendix C.

The notified chemical will share the same fate as the ATF in which it is blended. It is expected that 0.5% residue will remain in the "empty packaging" for import containers and it is estimated that 1% will remain in small packaging. Small packaging is likely to be sent to landfill, whilst larger operations are likely to send empty containers to licensed drum recyclers. It is expected that at most 25 kg of the notified chemical will be disposed of to landfill from small packaging. Although the notified chemical is not readily biodegradable, it is expected that it will degrade through a range of biotic and abiotic processes in landfill.

The ATF are expected to be collected either at the end of the useful life of the transmissions or if required during servicing, and properly disposed of. Used ATF may be recycled, re-refined, burnt as low grade burner fuel or disposed of by incineration. Automatic transmissions containing residual amounts of the notified chemical are expected to be disposed of to landfill or enter metal recycling.

The notified chemical is expected to be decomposed during re-refining to simpler organic molecules and completely combusted to oxides of carbon and nitrogen, and water vapour if burnt.

7.1.3 Predicted Environmental Concentration (PEC)

The calculation of a PEC has not been undertaken as the proposed use pattern of the notified chemical in ATF will lead to little aquatic exposure.

7.2. Environmental effects assessment

Details of these studies can be found in Appendix C.

Endpoint Result	Assessment Conclusion
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Fish Toxicity	LL50 >100 mg/L	The notified chemical is not toxic to Rainbow trout up to the limit of its water solubility.
Daphnia Toxicity	EL50 230 mg/L	The notified chemical exerts a toxic effect on aquatic invertebrates below the level of its water solubility.
Algal Toxicity	$\begin{array}{c} E_bL50~9.6~mg/L\\ E_yL50~10~mg/L\\ E_rL50~16~mg/L \end{array}$	WAFs of the notified chemical are toxic to algae. Noting that the analysis of the WAFs indicated that the components were present in extremely low concentrations (which were not quantifiable), the components of the WAFs are highly toxic to algae.
Inhibition of Bacterial Respiration Other	EC50 >1000 mg/L	The test substance is not considered inhibitory to sewage sludge up to the concentration tested.

7.2.1 Predicted No-Effect Concentration

A predicted no effect concentration (PNEC – aquatic ecosystems) of $<160 \mu g/L$ has been derived by dividing the end point value of 16 mg/L by a worst-case scenario uncertainty (safety) factor of 100 (as usable toxicity data are available for three trophic levels).

7.3. Environmental risk assessment

Although a Predicted Environmental Concentration (PEC) and hence risk quotient (RQ) cannot be calculated, the RQ is expected to be low as the exposure of the notified chemical to the aquatic environment is expected to be minimal. Furthermore, due to the notified chemical's low water solubility, it is unlikely that the entire amount of chemical entering the aquatic environment will be available to aquatic species. The notified chemical therefore is unlikely to pose an unacceptable risk to the environment.

8 RISK ASSESSMENT AND RECOMMENDATIONS RELATING TO EXTENSION APPLICATION

The proposed use, introduction volume and fate of the notified chemical will not change significantly under the proposed extension. The circumstances in the extension application are not expected to impact on the original human health and environmental risk assessment. Therefore, there are no changes required in the existing risk assessment and recommendations.

9. CONCLUSIONS AND REGULATORY OBLIGATIONS

Hazard classification

Based on the available data the notified chemical is classified as hazardous under the *Approved Criteria for Classifying Hazardous Substances* [NOHSC:1008(2004)]. The classification and labelling details are:

R38 Irritating to the skin

R43 May cause sensitisation by skin contact

R48/22 Harmful: danger of serious damage to health by prolonged exposure if swallowed

and

As a comparison only, the classification of the notified chemical using the Globally Harmonised System for the Classification and Labelling of Chemicals (GHS) (United Nations 2003) is presented below. This system is not mandated in Australia and carries no legal status but is presented for information purposes.

	Hazard category	Hazard statement
Skin irritation	2	Causes skin irritation
Skin sensitisation	1	May cause an allergic reaction
Specific target organ system toxicity – Repeated exposure	2	May cause damage to organs through prolonged or repeated exposure

Acute hazards to the aquatic environment	2	Toxic to aquatic life
Chronic hazards to the aquatic environment	2	Toxic to aquatic life with long lasting effects

Human health risk assessment

Under the conditions of the occupational settings described, the notified chemical is not considered to pose an unacceptable risk to the health of workers, provided that the notified chemical is handled in such a way as to minimise any potential exposure. Good working practices should be followed and appropriate personal protective equipment should be used where exposure might occur during handling.

When used in the proposed manner, the notified chemical is not considered to pose an unacceptable risk to the health of general public. However, the risk of a sensitisation response in exposed individuals cannot be ruled out

Environmental risk assessment

The chemical is not considered to pose a risk to the environment based on its reported use pattern.

Recommendations

REGULATORY CONTROLS

Hazard Classification and Labelling

- The Office of the ASCC, Department of Employment and Workplace Relations (DEWR), should consider the following health hazard classification for the notified chemical:
 - R38 Irritating to the skin
 - R43 May cause sensitisation by skin contact
 - R48/22 Harmful: danger of serious damage to health by prolonged exposure if swallowed
 - S24 Avoid contact with skin
 - S27 take off immediately all contaminated clothing
 - S28 After contact with skin, wash immediately with plenty of water
 - S36 Wear suitable protective clothing
 - S37 Wear suitable gloves
- Use the following risk phrases for products/mixtures containing the notified chemical:
 - Conc ≥ 1% R43
 - Conc ≥ 10% R48/22
 - Conc \geq 20% R38
- The National Drugs and Poisons Scheduling Committee (NDPSC) should consider the notified chemical for listing on the SUSDP.

Health Surveillance

As the notified chemical is a skin sensitiser, employers should carry out health surveillance for any
worker who has been identified in the workplace risk assessment as having a significant risk of skin
sensitisation.

CONTROL MEASURES

Occupational Health and Safety

- Employers should implement the following isolation and engineering controls to minimise occupational exposure to the notified chemical during formulation for in finished products:
 - Prevent leaks and spills
 - Wherever possible, direct handling of the notified chemical should be avoided; rather, some remote handling apparatus should be used.

• Employers should implement the following safe work practices to minimise occupational exposure during handling of the notified chemical during formulation and use of finished products:

- Avoid contact with skin, eyes and clothing.
- Avoid breathing mists.
- A shower station should be available.
- Avoid spills and splashing during use.
- After exposure, any contaminated PPE should be thoroughly cleaned before re-use.
- Employers should ensure that the following personal protective equipment is used by workers to minimise occupational exposure to the notified chemical during formulation and use of finished products:
 - Chemical resistant gloves
 - Chemical resistant clothing which protects the body, arms, legs and feet

Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.

- Only workers with sufficient education on the hazards of the notified chemical should handle it in any concentrated form, such as the imported product.
- A copy of the MSDS should be easily accessible to employees.
- If products and mixtures containing the notified chemical are classified as hazardous to health in accordance with the NOHSC *Approved Criteria for Classifying Hazardous Substances*, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation must be in operation.

Public Health

- The following measures should be taken by notifier to minimise public exposure to the notified chemical:
 - Products available to the public should contain the following warning statement:
 - Wear gloves when using
 - May cause allergic skin reaction

Environment

- The notified chemical should be disposed of by re-refining or authorised incineration.
- Spills or accidental release of the notified chemical should be handled by physical containment such as diking, whilst preventing entry into waterways and sewers. Collect free liquid for reuse to the extent practicable and dispose of the remainder. Residual liquid may be absorbed onto inert material (vermiculite, sand etc.) and collected for disposal.

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 an additive in automatic transmission fluids, or is likely to change significantly;

- the amount of chemical being introduced has increased from up to 5 tonnes, or is likely to increase, significantly;
- if 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.

Material Safety Data Sheet

The MSDS of the notified chemical and products containing the notified chemical provided by the notifier were reviewed by NICNAS. The accuracy of the information on the MSDS remains the responsibility of the applicant.

Extension Application:

The applicant for extension application has provided MSDS of a product containing the notified chemical. The accuracy of the information on the MSDS remains the responsibility of the extension applicant.

APPENDIX A: PHYSICAL AND CHEMICAL PROPERTIES

Pour Point -8.15 °C

Method OECD TG 102 Melting Point/Melting Range.

EC Directive 92/69/EEC A.1 Melting/Freezing Temperature.

Test Facility Safepharm Laboratories (2006a)

Boiling Point $>400 \pm 0.5$ °C at 101.72 kPa

Method OECD TG 103 Boiling Point.

EC Directive 92/69/EEC A.2 Boiling Temperature.

Remarks Differential scanning calorimetry (DSC) was used.

Test Facility Safepharm Laboratories (2006a)

Density $882 \text{ kg/m}^3 \text{ at } 20^{\circ}\text{C}$

Method OECD TG 109 Density of Liquids and Solids.

EC Directive 92/69/EEC A.3 Relative Density.

Remarks Pycnometer method was used. Test Facility Safepharm Laboratories (2006a)

Vapour Pressure 5.7 x 10⁻¹⁰ kPa at 25°C

Method OECD TG 104 Vapour Pressure.

EC Directive 92/69/EEC A.4 Vapour Pressure.

Remarks A vapour pressure balance system was used, at 145-155°C.

Test Facility Safepharm Laboratories (2006b)

Water Solubility $1.19 \times 10^{-4} - 7.0 \times 10^{-10} \text{ g/L at } 25^{\circ}\text{C}$

Method Estimated using Water NTTM Version 1.00/1.01, ©US EPA 2002

Remarks Water solubility trials with the notified chemical, according to OECD TG 105, were

attempted. However, excess test material was inseparable from the test solutions even after filtration and centrifugation. Therefore, the water solubility was estimated using computer based estimation software. As the notified chemical consists of a mixture of compounds an estimate of the water solubility was made for the component with the smallest molecular weight and one toward the upper limit of the molecular weight range. The modelling was conducted for the neutral molecules, and protonation of the notified chemical's basic functionality would be expected to result in increased water solubility.

Test Facility Safepharm Laboratories (2006a)

Not Determined

FULL PUBLIC REPORT: EX/150 (STD/1281)

Hydrolysis as a Function of pH

Remarks

Not determined due to the predicted low water solubility. The notified chemical does not contain functional groups which would be expected to undergo hydrolysis within the environmental pH range (4-9).

Partition Coefficient (noctanol/water)

log Pow = 3.86-9.24 at pH 3.3

Method

OECD TG 117 Partition Coefficient (n-octanol/water).

EC Directive 92/69/EEC A.8 Partition Coefficient.

Remarks

The partition coefficient was determined using the HPLC Method. The study was conducted under acidic pH (3.3) in order to ensure adequate ionisation for LCMS detection. It was considered that the basic conditions (pH 10-12) required to ensure all the notified chemical was present as the neutral base were outside the environmental pH range (and would have made LCMS analysis almost impossible). While pH of 3.3 is also outside the environmental pH range, it was chosen to allow LCMS detection and prevent interaction of the test material with the column. The range of results reflects the mixture

of components in the notified chemical.

Test Facility Safepharm Laboratories (2006a)

Adsorption/Desorption

 $\log K_{oc} = 3.99-6.64$

Method Estimated using PCKOWIN version 1.66, ©US EPA 2002

Remarks

Due to the predicted low solubility of the components in the notified chemical the adsorption behaviour was estimated using computer based estimation software. As the notified chemical consists of a mixture of compounds an estimate of the water solubility was made for the component with the smallest molecular weight and one toward the upper limit of the molecular weight range. The modelling was conducted for the neutral molecules, and protonation of the notified chemical's basic functionality would be expected to result in an increase in water solubility which would normally result in decreased adsorption of the notified chemical. However, protonation would increase the

adsorption to clays and minerals.

Test Facility Safepharm Laboratories (2006a)

Dissociation Constant

Not Determined

Remarks The notified chemical contains functional groups which are expected to display typical

basicity with a pKa ~9-10. Thus, the notified chemical would be ionised throughout the

environmental pH range of 4-9.

Flash Point 136 ± 2 °C at 101.52 kPa

Method EC Directive 92/69/EEC A.9 Flash Point. Remarks Closed cup equilibrium method was used.

Test Facility Safepharm Laboratories (2006b)

Autoignition Temperature $344 \pm 5^{\circ}C$

Method EC Directive 92/69/EEC A.15 Auto-Ignition Temperature (Liquids and Gases).

Safepharm Laboratories (2006b) **Test Facility**

Explosive Properties Not explosive

Method EC Directive 92/69/EEC A.14 Explosive Properties.

Remarks Estimated based on the chemical structure.

Test Facility Safepharm Laboratories (2006b)

Oxidizing Properties Not oxidising

Method EC Directive 92/69/EEC A.21 Oxidizing Properties (Liquids).

Remarks Estimated based on the chemical structure.

Test Facility Safepharm Laboratories (2006b)

APPENDIX B: TOXICOLOGICAL INVESTIGATIONS

B.1. Acute toxicity – oral

TEST SUBSTANCE Notified chemical

METHOD OECD TG 423 Acute Oral Toxicity – Acute Toxic Class Method.

EC Directive 2004/73/EC B.1 tris Acute Toxicity (Oral).

Species/Strain Rat/ Sprague Dawley CD

Vehicle None

Remarks - Method No significant deviation from the protocol.

RESULTS

Group	Number and Sex of Animals	Dose mg/kg bw	Mortality
1	3F	2000	0
2	3F	2000	0

LD50 > 2000 mg/kg bw

Signs of Toxicity No signs of systemic toxicity.

Effects in Organs No abnormalities were noted following terminal necropsy on Day 14.

Remarks - Results All animals survived the study and showed expected gain in body weight

during the 14-day observation period.

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

TEST FACILITY Safepharm (2006c)

B.2. Acute toxicity – dermal

TEST SUBSTANCE Notified chemical

METHOD OECD TG 402 Acute Dermal Toxicity – Limit Test.

EC Directive 92/69/EEC B.3 Acute Toxicity (Dermal).

Species/Strain Rat/ Sprague Dawley CD

Vehicle None
Exposure duration 24 hours
Type of dressing Semi-occlusive

Remarks - Method No significant deviation from the protocol.

RESULTS

Group	Number and Sex of Animals	Dose mg/kg bw	Mortality		
1	5/sex	2000	0		
LD50	>2000 mg/kg bw				
Signs of Toxicity - Local	was noted at all tr formation was obse- animals from Day 4	reatment sites on the the rved at the treatment sit 4, which lasted untill Da	reatment sites. Desquamation nird day after dosing. Crust es of 2 males and all female ay 6 to Day 10 after dosing. oted in 3 females from Day 6		
Signs of Toxicity - Systemic	 No signs of systemic 	toxicity were observed	during the study.		
Effects in Organs	No abnormalities were noted following terminal necropsy on Day 14.				
Remarks - Results	All animals survived the study and showed expected gain in body weight during the 14-day observation period.				

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

TEST FACILITY Safepharm (2006d)

B.3. Irritation – skin

TEST SUBSTANCE Notified chemical

METHOD OECD TG 404 Acute Dermal Irritation/Corrosion.

EC Directive 2004/73/EC B.4 Acute Toxicity (Skin Irritation).

Species/Strain Rabbit/New Zealand White

Number of Animals 3 Males for 4-hour exposure, 1 male each for 1-hour and 3-minutes

exposure

Vehicle None

Exposure Duration 4 hours, 1 hour, and 3 minutes

Observation Period 14 days (for 1-hour and 4-hour exposure)

Type of Dressing Semi-occlusive

Remarks - Method No significant deviation from the protocol.

RESULTS

Lesion		ean Scor nimal No	-	Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period
	1	2	3			-
Erythema/Eschar	2	2	2	2	>14 days	0
Oedema	1.33	1.33	1	2	<7 days	0

^{*}Calculated on the basis of the scores at 24, 48, and 72 hours for EACH animal (after 4 hours exposure).

Remarks - Results

4-hour exposure

Well-defined erythema was noted in 2 test animals 1 hour after patch removal and in all animals at the 24, 48 and 72-hour observations. Slight erythema was noted in one animal on Day 7. No erythema was observed by Day 14.

Slight oedema was noted in 2 animals at 1 and 24 hours after patch removal. Very slight oedema was observed in one animal 24 hours after patch removal and in all animals up to 72-hour observation. No oedema was observed by Day 7.

Light brown discolouration of the epidermis and loss of skin elasticity were each observed in 2 animals at the 72-hour observation. Crust formation and slight desquamation were noted in all animals at the 7-day and 14-day observation, respectively.

1-hour exposure (in one animal)

Well-defined erythema and very slight oedema were noted at the 24, 48 and 72-hour observation. Light brown discolouration of the epidermis was noted at the 72-hour observation and moderate desquamation noted at the 7-day observation.

3-minute exposure (in one animal)

No evidence of skin irritation or corrosion was noted.

CONCLUSION The notified chemical is severely irritating to the skin.

TEST FACILITY Safepharm (2006e)

B.4. Irritation – eye

TEST SUBSTANCE Notified chemical

METHOD OECD TG 405 Acute Eye Irritation/Corrosion.

EC Directive 2004/73/EC B.5 Acute Toxicity (Eye Irritation).

Species/Strain Rabbit/New Zealand White

Number of Animals 3 Males

Observation Period 72 hours (7 days for one animal)

Remarks - Method No significant deviation from the protocol. A Rabbit Enucleated Eye Test

(REET) was conducted prior to the eye irritation study, which indicated that the notified chemical was unlikely to cause severe ocular irritancy.

RESULTS

Lesion		1ean Scot Animal N	-	Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period
	1	2	3			
Conjunctiva: redness	1.67	1	0.67	2	<7 d	0
Conjunctiva: chemosis	0.67	0.33	0.33	1	<48 h	0
Conjunctiva: discharge	0	0	0.67	1	<72 h	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 Minimal to moderate conjunctival irritation was noted in all treated eyes

one hour after treatment and at the 24 and 48-hour observations, except in one treated eye at the 72-hour observation. No effects to the cornea or iris

were observed in the study.

CONCLUSION The notified chemical is slightly irritating to the eye.

TEST FACILITY Safepharm (2006f)

B.5 Skin sensitisation – mouse local lymph node assay (LLNA)

TEST SUBSTANCE Notified chemical

METHOD OECD TG 429 Skin Sensitisation - Local lymph node assay

EC Directive 2004/73/EC B.42 Skin Sensitisation - Local lymph node

assay.

Species/Strain Mouse CBA/CaBkl (Females)

Vehicle Butanone

Remarks - Method No significant deviation from the protocol. A preliminary screening test

was conducted using the test material at concentrations of 10%, 25% and 50% in butanone. Based on the result, the test material at concentrations

of 2.5%, 5% and 10% in butanone was selected for the main test.

RESULTS

Concentration	Proliferative response	Stimulation Index
(% w/w)	(DPM/lymph node)	(Test/Control Ratio)
Test Substance		
0 (vehicle control)	$737.97 (\pm 275.87)$	n/a
2.5	$9122.17 (\pm 6080.77)$	12.36
5	$15482.17 (\pm 3697.67)$	20.98
10	$21497.93 (\pm 5086.54)$	29.13
Positive Control		
(α-Hexylcinnamaldehyde, Tech 85%)		
5	Not documented	3.08
10	Not documented	4.54
25	Not documented	8.06

Remarks - Results

Preliminary screening test

The animal treated with 50% test material was killed on Day 3 due to the approach of the moderate severity limit (hunched posture and moderate redness to ears, head and neck). Bodyweight loss of 2 g was noted in the animal treated with 25% of the test material. No signs of systemic toxicity were observed in the animal treated with 10% of the test material.

Main test

No deaths or signs of systemic toxicity were observed in the main study.

An Effective Concentration inducing a SI of >3 (EC₃) was then calculated to be 0.7% indicating a strong sensitising property (Schneider and Akkan, 2004)

2004).

CONCLUSION There was evidence of induction of a lymphocyte proliferative response

indicative of strong skin sensitisation to the notified chemical.

TEST FACILITY Safepharm (2006g)

B.6. Repeat dose toxicity

TEST SUBSTANCE Notified chemical

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

EC Directive 96/54/EC B.7 Repeated Dose (28 Days) Toxicity (Oral)

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

Route of Administration Oral – gavage

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

Post-exposure observation period: 14 days

Vehicle Arachis oil BP

Remarks - Method No significant deviation from the protocol. A dose range-finding study was initially performed with 6 animals (3/sex) using control and two test

doses, 500 and 1000 mg/kg bw/day for 14 consecutive days.

In the main study, two recovery groups were included for control and high dose groups, using 5 male and 5 female animals per group. Recovery treatment-free period was 14 days after which all animals were subject to gross necropsy examination and histopathological evaluation similar to

the non-recovery treatment groups.

RESULTS

Dose range-finding study

Increased salivation and staining around the mouth were observed during the study. No adverse effects on body weight or findings upon necropsy were reported in the test report.

Main study

Group	Number and Sex	Dose	Mortality
-	of Animals	mg/kg bw/day	•
control	5/sex	0	0
low dose	5/sex	25	0
mid dose	5/sex	150	0
high dose	5/sex	1000	0
control recovery	5/sex	0	0
high dose recovery	5/sex	1000	0

Mortality and Time to Death

No mortality occurred during the study.

Clinical Observations

Increased salivation with associated red/brown staining around mouth was observed up to 1 hour after dosing in either sex treated with 1000 mg/kg bw/day from Day 3. Isolated incidents of this observation were also found at 150 mg/kg bw/day during the study. These clinical signs disappeared following cessation of the treatment.

No treatment related observations were found in behavioural and sensory reactivity assessments, and functional performance tests. Reduced bodyweight gain was found only in 1000 mg/kg bw/day males during Week 1 and Week 4. Slight reductions in dietary intake with or without corresponding disruptions in food efficiency were found in animals of either sex treated with 1000 mg/kg bw/day. Increased water consumption was found in animals of either sex treated with 1000 mg/kg bw/day from Week 3 onwards, with the effect still evident in female recovery group after the treatment-free period.

Laboratory Findings

Haematology

Elevated leucocyte counts, specifically in the neutrophil fraction, were found in animals of either sex treated with 1000 mg/kg bw/day, together with reductions in mean cell haemoglobin concentration. Males treated with 1000 mg/kg bw/day also displayed reduced mean cell volume, with increase in haematocrit counts and red blood cell counts. Furthermore, increases in platelet counts, activated partial thromboplastin time, and clotting times were found in females. Increased platelet counts were also evident in the female recovery group.

Similar effects were found at 150 mg/kg bw/day. An increase in haemotocrit counts and red blood cells was observed in males. Reductions in mean corpuscular haemoglobin concentration and increase in platelet and neutrophil count were seen in females.

Clinical Chemistry

Animals of either sex treated with 1000 mg/kg bw/day showed increases in aspartate aminotransferase and alanine aminotransferase, with reductions in alkaline phosphatase. Reductions in plasma cholesterol were also evident in animals of either sex treated with 1000 mg/kg bw/day and 150 mg/kg bw/day. In addition, males at 1000 mg/kg bw/day and 150 mg/kg bw/day showed statistically significant decreases in triglyceride and bilirubin levels. The decreased triglyceride levels persisted in the recovery group. Other sex-specific effects at 1000 mg/kg bw/day include increased urea, potassium, and decreased glucose in males and decreased potassium, phosphate and chloride in females. Males receiving 150 mg/kg bw/day also showed an increase in aspartate aminotransferase and alanine aminotransferase, with a reduction in plasma glucose.

<u>Urinalysis</u>

Increased (but not statistically significant) urine volume of reduced specific gravity was found at the end of the treatment period in animals of either sex treated with 1000 mg/kg bw/day.

Effects in Organs

Organ weight

No treatment-related effects were found in organ weight.

Necropsy findings

A fluid-filled duodenum, jejunum and ileum, with dark patches on the ileum was evident in one female treated with 1000 mg/kg bw/day. Small seminal vesicles were found in two males treated with 150 and 1000 mg/kg bw/day and small prostates were found in two males treated with 1000 mg/kg bw/day only.

Histopathology

Mucosal hypertrophy and vacuolation of the mucosal lamina propria were seen in the duodenum, jejunum and ileum in animals of either sex treated with 1000 mg/kg bw/day. The histopathological effects observed in the intestine at 150 mg/kg bw/day occurred at a lower incidence (mucosal hypertrophy was present in 2/5 duodenum, 0/5 ileum, 0/5 jujenum; vacuolation of the lamina propria cells was present in 0/5 duodenum, 0/5 ileum, 2/5 jejunum) and reported to be less severe than those observed at 1000 mg/kg bw/day. Vacuolation of lamina propria cells remained prevalent among the recovery group.

Slight to marked sinus histiocytosis of the mesenteric lymph nodes and vacuolation of histiocytes were observed in animals treated with 1000 mg/kg bw/day. The histopathological effects observed in the mesenteric lymph nodes at 150 mg/kg bw/day occurred at a lower incidence (sinus histocytosis 3 slight, 1 moderate/5; vacuolation of histiocytes 1 slight, 4 moderate /5). Both conditions persisted among the recovery group. Similar findings but with minimal grade of severity were also found at 25 mg/kg bw/day, however, this finding was not dose-related.

Remarks – Results

This study resulted in treatment-related changes at all dose levels, therefore, a no observed effect level (NOEL) cannot be established. However, the effect at 25 mg/kg bw/day was considered not to represent an adverse health effect due to isolated morphological changes at both lower incidence and grades of severity.

CONCLUSION

The No Observed Adverse Effect Level (NOAEL) was established as 25 mg/kg bw/day in this study, based on absence of adverse health effect at this dose level.

TEST FACILITY Safepharm (2007a)

B.7. Genotoxicity - bacteria

TEST SUBSTANCE Notified chemical

METHOD OECD TG 471 Bacterial Reverse Mutation Test.

EC Directive 2000/32/EC B.13/14 Mutagenicity - Reverse Mutation Test

using Bacteria. (Direct plate incorporation method)

Species/Strain S. typhimurium: TA1535, TA1537, TA98, TA100

E. coli: WP2uvrA-

Metabolic Activation System Phenobarbitone/β-naphthoflavone induced rat liver microsome

preparations (S9 mix)

Concentration Range in a) With metabolic activation:

Main Test 1.5, 5, 15, 50, 150, 500, 1500 and 5000 μg/plate

b) Without metabolic activation:

0.5, 1.5, 5, 15, 50, 150, 500, 1500 and 5000 µg/plate

Vehicle Acetone

Remarks - Method A preliminary cytotoxicity test was performed using a vehicle control and

a range of 10 concentrations of the notified chemical from 0.15 to 5000 µg/plate using *S. typhimurium*: TA100 and *E. coli*: WP2uvrA-strains.

No significant deviation from the protocol. Appropriate known mutagens were tested in parallel to the notified chemical to validate the sensitivity

of the assay.

RESULTS

Metabolic	Test Substance Concentration (µg/plate) Resulting in:						
Activation	Cytotoxicity in Preliminary Test	Cytotoxicity in Main Test	Precipitation	Genotoxic Effect			
Absent	·						
Test 1	≥150	≥50	≥1500	Negative			
Test 2	≥1500	≥50	≥1500	Negative			
Present							
Test 1	≥150	≥150	≥1500	Negative			
Test 2	≥1500	≥150	≥1500	Negative			

Remarks - Results

No significant increases in the frequency of revertant colonies were recorded for any of the bacterial strains at any dose levels either with or without S9.

The test material caused a visible reduction in the growth of the bacterial background lawn to all the S. typhimurium strains, initially at 50 and 150 μg/plate in the absence and presence of S9, respectively. No toxicity was observed to E. coli: WP2uvrA strains at any dose levels tested either with or without S9. An oily precipitate was noted at and above 1500 µg/plate which did not prevent the scoring of revertant colonies.

All of the positive control chemicals used induced marked increases in the frequency of revertant colonies.

CONCLUSION

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

TEST FACILITY

Safepharm Laboratories (2006h)

B.8 Chromosome aberration test - in vitro

TEST SUBSTANCE Notified chemical

METHOD OECD TG 473 In vitro Mammalian Chromosome Aberration Test.

EC Directive 2000/32/EC B.10 Mutagenicity - In vitro Mammalian

Chromosome Aberration Test.

Cell Type/Cell Line

Chinese Hamster Lung (CHL) cells Metabolic Activation System

Phenobarbitone/β-naphthoflavone induced rat liver microsome

preparations (S9 mix) at 2% and 5%.

Vehicle

Remarks - Method

A preliminary toxicity test was performed in the dose range between 0.12 to 60 µg/ml. Growth inhibition and mitotic index were examined to evaluate toxicity after 24h continuous treatment without metabolic activation and after 6h treatment in the presence and absence of metabolic activation followed with 18h of incubation.

No significant deviation from the protocol. Appropriate known mutagens were tested in parallel to the notified chemical.

Metabolic Activation	Test Substance Concentration (µg/mL)	Exposure Period (h)	Harvest Time(h)
Absent			
Test 1	0*; 0.94, 1.88*, 3.75*, 5.63, 7.5*, 11.25	6	24
Test 2	0*; 0.235, 0.47*, 0.94*, 1.88*, 3.75, 7.5	24	24
Present at %			
Test 1 @ 5%	0*; 3.75, 7.5, 15*, 30*, 45*, 60	6	24
Test 2 @ 2%	0*; 1.88, 3.75*, 7.5*, 15*, 30, 60	6	24

RESULTS

Metabolic	Test Substance Concentration (µg/mL) Resulting in:						
Activation	Cytotoxicity in Preliminary Test	Cytotoxicity in Main Test	Precipitation	Genotoxic Effect			
Absent							
Test 1	≥ 7.5*	≥ 7.5	> 11.25	Negative			
Test 2	≥ 3.75*	> 1.88	> 7.5	Negative			
Present							
Test 1	≥ 30**	≥ 30	> 60	Negative			
Test 2	-	≥ 30	> 60	Negative			

^{*} Based on inhibition of Cell Growth Index; ** Based on inhibition of Mitotic index

Remarks - Results

The test material did not induce any statistically significant increases in the frequency of cells with aberrations, or in the number of polyploid cells at any dose level, either in the presence or absence of metabolic activation.

The positive controls showed significant increases in mutagenic colonies, confirming the effectiveness of the test conditions.

CONCLUSION

The notified chemical was not clastogenic to Chinese Hamster Lung

(CHL) cells treated in vitro under the conditions of the test.

TEST FACILITY

Safepharm (2007b)

^{*}Cultures selected for metaphase analysis.

APPENDIX C: ENVIRONMENTAL FATE AND ECOTOXICOLOGICAL INVESTIGATIONS

C.1. Environmental Fate

C.1.1. Ready biodegradability

TEST SUBSTANCE Notified chemical

METHOD OECD TG 301 B Ready Biodegradability: CO₂ Evolution Test.

Inoculum Activated Sewage sludge obtained from a sewage treatment plant

Exposure Period 28 days

Auxiliary Solvent Dispersed on Silica gel

Analytical Monitoring CO₂ evolution

Remarks - Method Solubility testing indicated that the test material had poor solubility. As

the test substance was a liquid and of poor solubility, the test material was

suspended in the inoculum adsorbed to silica gel.

RESULTS

Test	substance	Sodium benzoate		
Day	% Degradation	Day	% Degradation	
0	0	0	0	
1	1	1	31	
6	5	6	77	
14	1	14	93	
22	11	22	91	
28	11	28	86	

Remarks - Results The notified chemical was not found to be inhibitory to activated sewage

sludge bacteria under the conditions of this test. The validation criteria for

the control were met.

CONCLUSION The notified chemical cannot be classed as ready biodegradable.

TEST FACILITY Safepharm Laboratories (2006i)

C.1.2. Bioaccumulation

Remarks Not determined. Bioaccumulation of the notified chemical is not

anticipated as the release to the aquatic environment will be very low and the notified chemical will be protonated throughout the environmental pH

range.

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 Directive 92/69/EEC C.1 Acute Toxicity for Fish -Semi-static.

Species Rainbow trout (Oncorhynchus mykiss)

Exposure Period 96 hours Auxiliary Solvent None

Water Hardness $\sim 140 \text{ mg CaCO}_3/L$

Analytical Monitoring HPLC/MS

Remarks - Method A range finding test was performed by preparing water accomodated

fractions (WAFs) of test substance of nominal concentrations of 10, 100 and 1000 mg/L by stirring the mixture of test substance and purified water for 23 hours and allowing the mixture to settle for 1 hour before siphoning the WAF. Three fish were subjected to the WAFs for 96 hours.

The main test was conducted by subjecting groups of ten fish to duplicate WAFs prepared at a loading rate of 100 mg/L of the test substance (prepared in the same manner as described previously). The test solutions were replaced every 24 hours. No micro-dispersions or undissolved material was present. The concentrations were determined by HPLC/MS on fresh an old samples at 0, 24, 72 and 96 hours. Analysis of the samples showed extremely low measured concentrations for each of the ion masses analysed. However, reference standards for each of the components detected in standard solutions of the test material or the WAFs do not exist, hence, it was not possible to reliable quantify the concentrations of each of the components in the WAFs. Examination of the total ion chromatograms generated from the HPLC/MS analysis of the WAFs showed there were significant differences in the peak profiles when compared to the standard solutions. The most significant peak in the mass spectrums of the WAFs was ascribed to an impurity which was solubilised in the WAFs.

pH 7.6-7.9

Temperature 13.7-14.5°C

Dissolved Oxygen 9.6 – 10.4 mg O₂/L

Light: 16 hours light and 8 hours dark with 20 minute transition.

RESULTS

Remarks - Results

CONCLUSION

Concentration mg/L		Number of Fish	Mortality				
Nominal	Actual		1 h	24 h	48 h	72 h	96 h
Control	0	10	0	0	0	0	0
100	-	20	0	0	0	0	0
LL50 >100 mg/L at 96 hours NOEL 100 mg/L (WAF) at 96 hours							

water solubility.

TEST FACILITY Safepharm Laboratories (2007c)

C.2.2. Acute toxicity to aquatic invertebrates

TEST SUBSTANCE Notified chemical

METHOD OECD TG 202 Daphnia sp. Acute Immobilisation Test - Static.

EC Directive 92/69/EEC C.2 Acute Toxicity for Daphnia - Static.

No sub-lethal effects were observed throughout the definitive study.

The notified chemical is not toxic to Rainbow trout up to the limit of its

Species Daphnia magna

Exposure Period 48 hours Auxiliary Solvent None

Water Hardness Approximately 250 mg CaCO₃/L

Analytical Monitoring HPLC/MS

Remarks - Method A range finding test was performed by preparing three WAFs of test

substance of nominal concentrations of 10, 100 and 1000 mg/L by stirring the mixture of test substance and purified water for 23 hours and allowing the mixture to settle for 1 hour before siphoning the WAF. Ten daphnids

were subjected to the WAFs for 96 hours.

> The main test was conducted by subjecting duplicate test sample of ten daphnia to WAFs (concentrations detailed below) of the test substance (prepared in the same manner as described previously). As microscopic examination of the WAFs with the highest loading rates showed microdispersions all of the test substances were filtered. A reference substance (0.32, 0.56, 1.0, 1.8 and 3.2 mg/L of potassium dichromate) was also run. Analysis of the samples showed extremely low measured concentrations for each of the ion masses analysed. However, reference standards for each of the components detected in standard solutions of the test material or the WAFs do not exist, hence, it was not possible to reliable quantify the concentrations of each of the components in the WAFs. Examination of the total ion chromatograms generated from the HPLC/MS analysis of the WAFs showed there were significant differences in the peak profiles when compared to the standard solutions. The most significant peak in the mass spectrums of the WAFs was ascribed to an impurity which was solubilised in the WAFs.

pH 8.0

Temperature 19.9-20.3°C

Dissolved Oxygen 8.3-8.5 mg O₂/L

Light: 16 hours light and 8 hours dark with 20 minute transition.

RESULTS

Concentra	oncentration mg/L Number of D. magna		Number Immobilised		
Nominal	Actual	· -	24 h	48 h	
Control	-	20	0	0	
10	-	20	0	0	
18	-	20	0	0	
32	-	20	0	0	
56	-	20	0	2	
100	-	20	0	2	
180	-	20	1	2	
320	-	20	11	14	
560	-	20	16	20	
1000	-	20	19	20	

EL50 350 (95% CI; 290-430) mg/L at 24 hours 230 (95% CI; 150-360) mg/L at 48 hours

NOEC 32 mg/L (WAF) at 48 hours

The observed immobilisation data clearly show that the addition of the test material to the water column induced a toxic effect on the Daphnids. However, results of the chemical analyses for the test material in the WAFs were unreliable due to the low water solubility (predicted to be <1 mg/L for the major component) and the variability of the chromatographic profiles for the WAFs compared to the standard

solutions.

CONCLUSION The notified chemical exerts a toxic effect on aquatic invertebrates below

the level of its water solubility.

TEST FACILITY Safepharm Laboratories (2007d)

C.2.3. Algal growth inhibition test

Remarks - Results

TEST SUBSTANCE Notified chemical

METHOD OECD TG 201 Alga, Growth Inhibition Test.

EC Directive 92/69/EEC C.3 Algal Inhibition Test.

Species Desmodesmus subspicatus (formerly known as Scenedesmus subspicatus)

Exposure Period 72 hours

Remarks - Method

Concentration Range Nominal: 0.1, 1.0, 10 and 100 mg/L

Actual:
Auxiliary Solvent

Water Hardness

Analytical Monitoring

Actual:

None

Not specified

HPLC/MS

A range finding test was performed by preparing WAFs of test substance of nominal concentrations between 0.1 and 1000 mg/L by stirring the mixture of test substance and purified water for 23 hours and allowing the mixture to settle for 1 hour before siphoning the WAF. Algae were exposed to the WAFs for 72 hours.

The main test was conducted by subjecting triplicate test samples of algae of cell density of approximately 10⁴ cells per mL to the WAFs (concentrations detailed above) of the test substance (prepared in the same manner as described previously). Analysis of the samples showed extremely low measured concentrations for each of the ion masses analysed. However, reference standards for each of the components detected in standard solutions of the test material or the WAFs do not exist, hence, it was not possible to reliable quantify the concentrations of each of the components in the WAFs. Examination of the total ion chromatograms generated from the HPLC/MS analysis of the WAFs showed there were significant differences in the peak profiles when compared to the standard solutions. The most significant peak in the mass spectrums of the WAFs was ascribed to an impurity which was solubilised in the WAFs.

RESULTS

Bior	nass	Yie	eld	Gra	owth
NOEL*	E_bL50	NOEL*	$E_y L 50$	NOEL*	$E_r L 50$
(mg/L at 0-72 h	mg/L at 0-72 h				
3.2	9.6	3.2	10	3.2	16

*No observed effect loading

Remarks - Results Three endpoints were determined; the biomass integral, the Yield

(cells/mL) and the growth rate (cell/mL/hour). The observed toxicity endpoints clearly show that the addition of the test material to the water column induced a toxic effect on the algae. However, results of the chemical analyses for the test material in the WAFs were unreliable due to the low water solubility (predicted to be < 1mg/L for the major component) and the variability of the chromatographic profiles for the

WAFs compared to the standard solutions.

CONCLUSION WAFs of the notified chemical are toxic to algae. Noting that the analysis

of the WAFs indicated that the components were present in extremely low concentrations (which were not quantifiable), the soluble components

of the WAFs are highly toxic to algae.

TEST FACILITY Safepharm Laboratories (2007e)

C.2.4. Inhibition of microbial activity

TEST SUBSTANCE Notified chemical

METHOD In accordance with OECD TG 209 Activated Sludge, Respiration

Inhibition Test, EC Directive 88/302/EEC C.11 Biodegradation and US EPA Draft Ecological Effects Test Guidelines OPPTS 850.6800.

Activated Sludge Respiration Inhibition Test

Activated Sewage Sludge

Exposure Period 3 hours

Concentration Range

Remarks - Method

Inoculum

entration range

Nominal: 1000 mg/L Actual: Not Determined

Activated sludge organisms from the Severn Trent Water Plc sewage treatment plant at Loughborough, Leicestershire, UK, which treats predominantly domestic sewage sludge were used. A range finding test was conducted using duplicate samples of a control and single samples 100 mg/L and 1000 mg/L of test substance. A reference substance (3,5-dichlorophenol) was also run at 3.2 mg/L and 32 mg/L. Synthetic sewage was added to the test substances and the O₂ consumption rates were measured and compared with the control.

The main test was conducted by subjecting triplicate samples of 1000 mg/L of test substance to the inoculum and synthetic sewage sludge and measuring the O_2 consumption rate. A comparison was then made to the control which was run in duplicate. A reference substance (3,5-dichlorophenol) was also at concentrations of 3.2, 10, and 32 mg/L. pH 7.8-8.3

 $Total\; Hardness\; 100\; mg\; CaCO_3/L$

RESULTS

IC50 NOEC

Remarks - Results

> 1000 mg/L1000 mg/L

The range finding test showed that 1000 mg/L of test substance had 0% inhibition of respiration of activated sewage sludge. The test substances were observed as dark brown dispersions with globules of test material throughout and some adhered to the side of the flask. The average % inhibition of the main test at 3 hours was 1.7%. The reference substance had an IC50 of 6.1 mg/L, which was within the accepted value of 5-30 mg/L. Some of the initial and final dissolved oxygen concentrations were below the test guidelines (6.5 mg/L and 2.5 mg/L, respectively). This was not considered to have an adverse effect as the oxygen consumption rate was determined over the linear portion of the oxygen consumption trace.

CONCLUSION

The test substance is not considered inhibitory to sewage sludge up to the concentration tested.

TEST FACILITY

Safepharm Laboratories (2006j)

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