RAC/M/46/2018
Final
7 November 2018

Minutes of the 46th Meeting of the Committee for Risk Assessment (RAC 46)

10 September started at 09.00
14 September ended at 13.30

Part I Summary Record of the Proceedings

1. Welcome and apologies

The Chairman, Tim Bowmer, welcomed all the participants to the 46th meeting of the Committee for Risk Assessment (RAC 46). Apologies were received from three Members.

The Chairmen informed RAC that in March 2019 he would again provide a report to the Management Board of ECHA on the state of the Committee; this would be together with SEAC. In preparation for this, interviews with members will be conducted starting in October and running until January next year. He noted that the Management Board of ECHA when discussing Committee membership renewals now requests information on member's contribution in order to make their decision. He pointed out that this could be a good opportunity for RAC members to discuss any issues or concerns with the time allocated for their RAC work with their management, Competent Authority contact points and Management Board members.

The Chairman noted that the mandate for the four current co-opted RAC members ends during this meeting and invited the Committee to join him in congratulating them on their excellent contributions to evaluating authorisation dossiers. He noted that following an open call and selection process as agreed at RAC 44, five candidates would be put forward for co-option as members on Friday 14 September 2018.

The Chairman informed the Committee of the resignation of Norbert Rupprich as a member, noting that he had fulfilled an exceptional role by commenting widely on RAC opinions from his deep knowledge and expertise in toxicology, thereby helping and encouraging many colleagues. The Chairman and members joined in thanking Norbert for his long service to the Committee and wished him well in retirement.

Finally, he informed the Committee that discussions with DG-EMPL about the future of OEL development are ongoing.

The participants were informed that the meeting would be recorded solely for the purpose of writing the minutes and that this recording would be destroyed once no longer needed. He added that the recordings from the 45th meeting had already been destroyed. The Chairman noted that the minutes are adopted and they have been uploaded to S-CIRCABC and published on the ECHA website. The minutes include a full list of participants as given in Part III of these minutes.

2. Adoption of the Agenda

The Chairman reviewed the agenda for the meeting (RAC/A/46/2018).

The agenda and the list of all meeting documents, including conclusions and action points are attached to these minutes as Annexes I and II, respectively. No points were raised under any other business.

3. Declarations of conflicts of interests to the Agenda

The Chairman declared that he had no potential conflict of interest to any agenda points for the meeting with the exception of the CLH dossier on zinc pyrithione (as declared already at RAC 45 and recorded in the minutes of that meeting).

The Chairman further requested all participants to declare any potential conflicts of interest to any of the agenda items. 18 Members declared potential conflicts of interest, each to specific agenda items, the majority related to concurrent employment of Members at agencies submitting dossiers to RAC but who had not been involved in the preparation. In the event of a vote, these Members were requested to refrain from voting on the respective agenda items, as stated in Article 9.2 of the RAC Rules of Procedure. Where Members declared that they had contributed to the preparation of a substance dossier for consideration by RAC, or similar potential conflict, they were asked to refrain from voting and the Chairman noted that he would consider additional mitigation measures. The list of persons declaring potential conflicts is attached to these minutes as Annex III.

4. Appointment of (co-) rapporteurs

a) Appointment of (co-)rapporteurs for CLH dossiers, restriction dossiers, authorisation applications, DNEL/dose-response relationships, Article 95 (3) requests and Article 77 (3) (c) requests (closed session).

Due to time constraints, the appointments for specific processes were not done at the meeting, but will be processed via written procedure(s) after RAC 46.

5. Report from other ECHA bodies and activities

a) Report on RAC-45 action points, written procedures and an update on other ECHA bodies

The Chairman informed the Committee that all action points from the previous meeting RAC-45 had been completed. The summary of all substance-related written procedures, calls for expression of interests in (co-)rapporteurship and written procedures for appointments of rapporteurs, and adopted opinions, is provided in the room document on administrative issues (RAC/46/2018/01) (see Annex IV).

The Chairman also informed the Committee that the final minutes of RAC-45 had been adopted via written procedure and were uploaded to S-CIRCABC and are published on the ECHA website, and thanked those Members who had provided comments on the draft.

b) RAC workplan for all processes

The Chairman informed the meeting participants about the updated RAC work plan for Q4 2018 and for 2019, covering the three processes of Restriction, Authorisation, and Harmonised Classification and Labelling of substances. He informed Members that they could find the expected schedules for Restriction, Authorisation dossiers in the work plan. In addition, the scheduling to be considered for each Harmonised Classification and Labelling (CLH) dossier are given in the relevant section.

c) Annual update of RAC accredited stakeholders' list

RAC discussed the Secretariat's proposal on the annual update of the Committee's list of accredited stakeholder organisations. There was no change to the current stakeholder organisations regarded as regular or occasional observers and all retained their respective status. Six new organisations interested in the work of RAC were also added to the list as occasional observers. The updated list of stakeholders was agreed by RAC. This brings the number of Regular Stakeholders to 7 and the number of Occasional Stakeholders to 71; the status will be reviewed again in 2019.

The new stakeholders will be informed by the Secretariat about RAC's decision. The list will be published on ECHA's website and be applied with immediate effect following the end of the RAC-46 plenary meeting.

d) General RAC-procedures

Co-opted Members to RAC (closed session)

As a follow-up to the discussions at RAC-44, the SECR informed the Committee that the combined RAC-SEAC call for expression of interest published on 21 May, 2018 resulted in 63 candidates applying for nomination: 38 for RAC, 14 for SEAC and 11 candidates applied for both Committees.

In line with the selection process and the required expertise as agreed at RAC-44, the SECR explained the pre-selection of suitable candidates based on their track record, expertise and personal abilities as presented in CVs and in the interviews with the Chairman, their availability and their declarations of interests. In September, a short-list of nine candidates, including the Chairman's recommendation, was presented for peer-review to a panel of five appointed representatives of the Committee. This led to agreement on the selection of 5 candidates, who are now proposed to RAC for co-option to the Committee. The Chairman informed the members that two additional reserve candidates were agreed by the panel and would be called upon in case one of the nominees could not take up duty as foreseen; RAC would then be consulted on the reserve candidate(s) should the need arise.

The SECR noted that the candidates had been screened with regard to the ECHA eligibility criteria for Committees and for potential conflict of interest, the latter on the basis of written declarations as well as further checks and was satisfied as to the suitability of the candidates. Finally, The SECR reminded the Committee that in accordance with the expertise of the respective nominees, the co-opted members would principally work on either authorisations or development of occupational exposure limits but that a flexible approach would be taken. The Chairman mentioned that in line with the Rules of Procedure, Article 3 (2)[1] the co-opted Members would not have voting rights.

A short profile of each of the nominees was then presented to RAC. RAC agreed with the final list and co-opted the five nominees.

6. Requests under Article 77 (3)(c)

1) Request to review a derogation request for the PFOA restriction (entry 68 of Annex XVII to REACH)

The Chairman reminded the Committee that the Commission had received a request for re-examination of the existing restriction of PFOA and related substances (entry 68 of Annex XVII to REACH) in view of including a derogation for the use of PFOB for the manufacturing of certain pharmaceutical products using pressurised metered-dose inhalers for the treatment of pulmonary diseases. RAC and SEAC were requested to prepare an opinion in view of a possible derogation from the existing Annex XVII restriction of PFOA, its salts and the related substances within the scope of the restriction, by 1 December 2018. Following the approach used in the evaluation of the PFOA restriction proposal, also the requested derogation is assessed by RAC on the basis of PBT concern focusing the assessment on releases to the environment.

[1] https://echa.europa.eu/documents/10162/13579/rac_rops_en.pdf/a9f6376e-318f-41de-be0a-1631be9f34c4

The Rapporteur then presented to the Committee the draft opinion that responds to the mandate. The Rapporteur informed that the company concerned had responded to the questions posed by RAC after the previous RAC plenary and suggested that based on this additional information, RAC can conclude that gaseous as well as liquid emissions have been minimised. The Rapporteur thus proposed to RAC to support this additional derogation within the current scope of the restriction. Furthermore, the Rapporteur suggested to add a note to the RAC opinion that any alternative method used in the future for the liquid waste must have a similar efficiency as incineration and that the efficiency be validated by good monitoring data, making the method and efficiency enforceable. A representative of a NGO Stakeholder observer asked the Committee to consider recommending a time limit to the proposed derogation, given that the restricted substances are POPs and that other pharmaceutical companies are using already safer alternatives. Several RAC members supported the views of the Rapporteur.

The Committee adopted its opinion on this Article 77(3)(c) request by consensus. The Rapporteur was requested, together with the Secretariat, to make the final editorial changes to the adopted RAC opinion. The Chairman thanked the Rapporteur for his efficient and thorough handling of this proposal and the Committee Members for their contributions.

7. Requests under Article 95(3)

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8. Harmonised classification and labelling (CLH)

8.1 General CLH issues

8.2 CLH dossiers

A. Hazard classes for agreement without plenary debate[2] (see section B below for hazard classes for the same substances debated in plenary)

RAC reviewed an 'A-listing' of hazard classes for a range of substances and being informed by the Secretariat of the appropriate scrutiny by Rapporteurs and commenting RAC Members in each case, agreed these without plenary debate. The details for each substance are given below in section B.

B. Substances with hazard classes for agreement in plenary session

1) tribenuron-methyl (ISO); methyl 2-[*N*-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-*N*-methylcarbamoylsulfamoyl]benzoate

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that tribenuron-methyl (ISO) is an active substance used in plant protection products; it is used as an herbicide on a wide range of crops in EU Member States. The substance has harmonised classification and labelling entry in Annex VI of the CLP Regulation where it is classified as Skin Sens. 1; H317, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410, with a generic M-factor of 100. The legal deadline for the adoption of an opinion is 26 December 2018.

The DS (SE) proposed to retain classification Skin Sens. 1; H317, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410 (M = 100), to add STOT RE 2; H373 and to have M-factors of 100 for both aquatic acute and aquatic chronic classification.

[2] Following adequate scrutiny by the Rapporteur and commenting Members and taking the comments from the Public Consultation into account, selected hazard classes are proposed for agreement through a list ('fast-track') without further debate in the Committee.

RAC agreed the following endpoints via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for physical hazards (flammable solids, pyrophoric solids, emission of flammable gases), acute toxicity (all routes of exposure), STOT SE, skin irritation, eye irritation, germ cell mutagenicity and reproductive toxicity, and classifications for Skin Sens. 1; H317, Aquatic Acute 1; H400 (M = 100) and Aquatic Chronic 1; H410 (M = 100).

RAC then discussed STOT RE and carcinogenicity. On the former hazard class, the DS's proposal to classify the substance as STOT RE 2; H373 without a target organ indication, was supported by the rapporteurs. This was based on mortality in a rabbit developmental toxicity study, supported by mortality in two pilot rabbit developmental toxicity studies. The rapporteurs acknowledged that several repeated dose toxicity studies in other species, i.e. rats, mice and dogs are available. However, the observed effects in these species on liver (in rats/mice), spleen (in rats), blood parameters and thyroid (in dogs) were not severe enough to warrant classification.

One RAC member noted that rabbits are the most sensitive species in this case and that deaths of rabbits in a developmental toxicity study may be enough to lead to classification of a substance. However in this case the number of deaths in the main developmental toxicity study is small and the member was in favour of 'no classification'. One RAC member questioned the relevance to humans of findings in two pilot rabbit developmental toxicity studies. RAC agreed to classify the substance as STOT RE; H373 based on the arguments given by the rapporteurs (a.o. consistency and dose-response seen over the main and pilot studies). One RAC member disagreed with this approach, reserved their position and subsequently submitted a written minority position.

In an 18-month carcinogenicity study in mice (0, 20, 200 and 1 500 ppm in diet) demonstrated no treatment-related increase in tumour incidences. In a 2-year carcinogenicity study in rats (0, 25, 250 and 1 250 ppm in diet) mortality and clinical signs were not affected, but general systemic toxicity at 250 and 1 250 ppm doses was observed, such as reduced mean bodyweight and bodyweight gain in both male and female rats and increased number of non-neoplastic lesions in several organs (in male rats at 250 and 1250 ppm, in female rats only at 1 250 ppm). The rapporteurs concluded that in male rats there was no treatment-related increase in any specific tumour type warranting classification, including epididymis (single incidences only) and thyroid (slight, not statistically significant increases in one sex of rats only). In female rats an increase in mammary gland adenocarcinoma was seen only at doses where the maximum tolerated dose was reached, which was not considered to justify classification. RAC concurred with the conclusions by the rapporteurs and agreed on 'no classification' for carcinogenicity.

RAC adopted the opinion by simple majority. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

2) Dichlorodioctylstannane

The Chairman reported that dichlorodioctylstannane is used in closed processes as an intermediate in synthesis or formulation and manufacture of other substances; it is also used as laboratory reagent. The substance has harmonised classification and labelling entry in Annex VI of the CLP Regulation where it is classified as Acute Tox. 3*; H331, STOT RE 1; H372** and Aquatic Chronic 3; H412. The legal deadline for the adoption of an opinion is 5 January 2019.

The DS (SE) proposed to add Repr. 1B; H360D (SCL ≥ 0.03 %), and to modify Acute Tox. 2; H330.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: classification for Acute Tox. 2; H330 (ATE = 0.0975 mg/L).

RAC discussed toxicity to reproduction. There were two studies most relevant to fertility: a reproduction screening study and an extended one-generation reproductive toxicity (EOGRT) study. The RAC members were of the view that the tested doses were too low (up to 2.1 mg/kg bw/day and without any adverse effects in parental animals) in the EOGRT study to address the fertility effects. The negative reproduction screening study investigated only limited endpoints and had a limited scope. For these reasons, RAC concluded on no classification for the effects on fertility based on lack of relevant data.

According to the rapporteur there was clear evidence of developmental effects including skeletal malformations in the absence of significant maternal toxicity in the prenatal developmental study, and reduced pup viability and increased post-implantation loss without evidence that these effects would be solely secondary non-specific consequences of maternal toxicity in the reproduction screening study. There was also supporting evidence in the EOGRT study consisting of potential effects on the developing immune system, a small increase in post-implantation loss and a small decrease in post-natal viability. Supporting evidence in the screening study consisted of reduced pup weight, runts and cold pups, and in the OECD TG 414 study of reduced ossification.

Consequently, and in line with the DS, RAC considered classification of dichlorodioctylstannane in category 1B (H360D): May damage the unborn child) as justified. The Committee also agreed on the proposed SCL ≥ 0.03 % for developmental effects based on an ED_{10} < 4 mg/kg bw/day for skeletal malformations.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

3) Lead

The Chairman welcomed the expert from the International Lead Association accompanying the Eurometaux stakeholder observer and the dossier submitter's two representatives (DK) attending the meeting.

The Chairman reported that the CLH dossier was tabled for discussion only at this RAC meeting in order to investigate a number of important key issues and will be carried over to the following meeting for adoption. He reported that lead has a large variety of uses, both for industrial purposes as well as in consumer products. Presently lead has already two separate entries (one for the massive and one for the powder form; distinguished by a particle diameter of 1 mm) in Annex VI of the CLP Regulation both with the classification as Repr. 1A, H360FD and for Lactation, H362. For the powder form (particle diameter < 1 mm) additionally SCLs of C ≥ 0.03 % for Repr. 1A are specified. The legal deadline for the adoption of an opinion is 6 February 2019.

The DS proposes to classify lead (both massive and powder forms) as hazardous to the aquatic environment with Aquatic Acute 1 and Chronic 1; both with separate M-factors of 10.

On the assessment of the two forms of lead, massive and powder, the Rapporteur noted, in agreement with the DS proposal, that a clear distinction between massive and powder forms is difficult to make, given that the two forms do not exhibit different crystallographic structures. In addition, the Rapporteur stated that there are powder forms on the market with a greater surface area than the powder that has been tested (i.e. 75 µm), whereas the results for classifying the metal should generally be obtained from the smallest particle size on the market.

The representative from Eurometaux stressed that the three conditions according to CLP, justifying a different classification for the two forms, were met. These conditions cover different dissolution rates of the two forms, which are evident from the results presented in the CLH

proposal as well as from information submitted during PC. The other two conditions are also fulfilled, namely that both forms are produced in a different way, which is the case for lead taking into consideration its malleable nature, which makes it impossible to produce powder forms directly out of it. Finally, the third condition, *i.e.* generation of relevant amounts of fine particles from the massive form under normal handling and use, which is not met either. The Eurometaux representative furthermore stressed that the reasoning for applying the same classification for both forms should not be based on examples made with regard to lead articles on the market (lead film, wool). In conclusion, the decision on the classification for lead should be based on the information available for both forms and in consistency with previous metal cases.

The DS responded that powder is intentionally produced from the massive form, by melting the massive and pouring it through an air jet stream dispersing the massive into small particles. With regard to solubility, the DS did not consider this as an argument in its own right which would justify a split classification, because the CLP Regulation already has a system in place addressing this property (Article 23 on the derogation from labelling requirements of massive forms), acknowledging that larger particles (*i.e.* massive) are less soluble than smaller particles.

The Chairman flagged this issue for further detailed consideration. In order to allow the Committee to fully evaluate the scientific evidence supporting a dual classification and to allow a reasoned comparison with a single classification as proposed by the DS, he requested the secretariat to summarise the composition and history of the current Annex VI entries for other relevant metals and also accepted Eurometaux's offer to provide a similar summary from their experience.

The Chairman noted that the further discussion on the above topic and those listed below should be primarily based on the scientific evidence, i.e. the intrinsic properties of lead.

1. Concerning data selection for chronic aquatic toxicity, the discussion focused on one study (Grosell et al., 2006) proposed by the Rapporteurs to derive the chronic ERV (NOEC of 0.9 µg/L (mortality) for the fish *Pimephales promelas*; pH 6.7). In the exposure medium of the study, the organic buffer 3-(*N*-morpholino)propanesulfonic acid (MOPS) was used for pH maintenance, which is reported to affect the ion regulation of fish at the gill surface and thus influences the toxicity of lead to fish. One RAC member expressed concern on the reliability of the study and asked for a more detailed assessment. RAC questioned whether this data point is an outlier (because compared to other data points with this species it is significantly lower by a factor of around 20 as well as compared to other species it is also an order of magnitude lower) and referred to the DS who originally discounted the study. RAC stressed the difficulty for making a judgment, as only information on selected studies was included in the submitted CLH proposal, not the whole range of available data points. The rapporteur concluded that the calculated Acute-to-Chronic Ratio (ACR) is 1.8, which is within the bounds of biological variability and therefore, this data point could be used for ERV derivation. It was noted that MOPS forms complexes with lead and therefore all the factors (in particular DOC concentration as one of the most important factors), which affect the bioavailability of lead should be considered. The expert accompanying the Eurometaux stakeholder shared this view on the low reliability of the study. He outlined the mechanism of MOPS on the gill surface, where it affects the sodium uptake and the ammonium excretion. Moreover, the results of two follow-up studies performed with this *P. promelas* with different pHs (7.4 as control without MOPS and 8.1 using MOPS) showed stronger effects when the buffer was used (studies with 6.7 and 8.1) compared to the control study performed at pH 7.4. Apart from this, the industry expert expressed his disagreement on using the lowest data point, given that there is a range of other data points available on this species with higher

Klimisch score, some of which performed under similar test conditions as demonstrated in the supplemental industry comments made available to RAC prior to the RAC-46 meeting.

2. With regard to the use of *Ceriodaphnia dubia* and *Lymnaea stagnalis* for chronic ERV derivation, as proposed by the DS in the original CLH proposal, RAC concluded to use the former, given that this was consistent with previous cases, such as granulated copper. The chairman acknowledged the industry acceptance on using *C. dubia* and their reservations concerning *L. stagnalis* as the data point was generated at a time with no guideline for this species and on the larval phase. The OECD 243 guideline available now is on adults of this species, thus not directly applicable for larvae. The Eurometaux expert informed RAC that recent information indicates that the use of non-standard diets in various tests may have implications on the observed sensitivity of this species. The DS noted the acceptance of this species in the case of nickel, confirming it to be a sensitive organism in several studies performed.

3. Regarding derivation of M-factors, the Rapporteurs presented a proposal following the method as specified in the metals section of the CLP guidance in contrast to the DS who suggested setting the M-factor directly in relation to the ERV. The Rapporteurs proposed an acute M-factor of 1 (based on the acute ERV of 20 µg/L for *P. subcapitata* and by using the T/Dp data from the 24 hours screening test extrapolated to 1 mg/L loading rate for the powder form) and, in contrast to the DS proposal, a chronic M-factor of 1 (based on the chronic ERV of 0.9 µg/L for *Pimephales promelas* and by using the 28 days T/Dp data at 0.1 mg/L loading rate for the massive from). RAC stressed the need for consistency with previous decisions and supported the Rapporteur's view. The DS explained that the CLP guidance has been followed in the CLH proposal. However, due to lack of relevant data some extrapolation had been employed. In addition, the DS noted that also the GHS methodology was followed which resulted in the same value for the M-factors. Regarding the chronic M-factor proposed by the Rapporteurs, the DS furthermore outlined that according to the CLP guidance the M-factors should be derived from a loading rate of 1 mg/L, whereas the Rapporteurs used a loading rate of 0.1 mg/L, resulting in a chronic M-factor that is 10 times lower than the one proposed by the DS. With respect to the acute M-factor and given the lack of adequate T/Dp data at the relevant time point of 7 days, the DS concluded that the proposed M-factor is even more uncertain.

4. On the statistical treatment of test data and recognition of the data-richness of lead, the Rapporteurs considered the DS proposal to use the lowest value instead of the geometric mean for derivation of the ERVs, because the available studies have been performed under varying conditions. They agreed with the DS that splitting the rather large data set into pH bands was not appropriate, given that no correlation could be established between toxicity and pH. The DS highlighted that the normalisation applied by industry uses the BLM method. The industry expert stressed the need to use of all available data for the derivation of the ERV, applying appropriate statistical treatment when relevant and applying normalisation preferably with BLMs. They thereby referred to the CLP guidance as well as the previous metal cases and especially the one for granulated copper recently adopted by RAC, in which normalisation was done[3].

[3] Note of the secretariat: for granulated copper the ERVs were normalised for DOC, which is not the same as bioavailability correction using BLMs.

The DS noted the compilation of all *Ceriodaphnia dubia* and *Lymnaea stagnalis* studies which he prepared and offered to share with RAC, which was appreciated by the Chairman. Furthermore, he stressed that in his view the normalisation applied by industry to the data points does not provide any reduction in the variability (which should be the purpose of any normalisation). Moreover, concerning the use of BLMs, he reported that recent studies on the two main packages of BLMs raised doubts on the reliability of their use. The outcome of these studies – one performed by industry and the other one by the Netherlands - is publicly available. He furthermore mentioned the work currently performed under the Water Framework Directive looking into the above topic and concluded that at this stage he cannot recommend BLMs being used.

5. The Rapporteur presented the approach taken by the DS on the use of the Transformation/Dissolution protocol (T/Dp) data. In the original proposal, the DS omitted the available full T/Dp test data for lead massive and instead extrapolated the available information from a 24 hours T/D screening test to classify the powder form and applied the conclusions from this extrapolation to the massive form of lead. The representative from Eurometaux stressed that the current approach taken by the DS is not correct given a full T/Dp data set for lead massive exist and should be used. On the T/Dp information for the powder form, Eurometaux clarified that the test was indeed stopped after 24 hours of the full test because the dissolution was already so high that further testing was not considered relevant (as the dissolution after 24 hours already equated the soluble form). They further outlined that the correct application of the CLP guidance would result in a classification of the Lead metal powder as the soluble form and a second one, based on the available full T/Dp data, for the massive form.

Further work on the proposal concerning the environmental classification will continue after analysis of the written clarification requested from the DS on (i) the assessment of the two forms of lead and the associated classification(s) and (ii) his response to the approaches presented by industry in their supplemental comments submitted to RAC prior to the RAC-46 meeting. The proposal for environmental classification is scheduled for discussion and adoption at the forthcoming RAC-47 in November 2018.

The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

4) trimethoxy(methyl)silane

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that trimethoxy(methyl)silane (TMMS) is used in adhesives and sealants, coating products and textile treatment products and dyes. It is used as intermediate to manufacture other substances. The legal deadline for the adoption of an opinion is 14 November 2018.

The substance has no existing entry in Annex VI to the CLP Regulation.

The DS (SE) proposed to classify the substance as Skin Sens. 1B; H317.

The skin sensitisation potential of trimethoxy(methyl)silane has been assessed in two studies, each of which RAC considered to have some deficiencies. RAC was of the view that the first Buehler test (2009) was of limited reliability since the frequency of positive skin reactions was approximately the same in the negative control and in the treated group. The second Buehler test (2013) showed deviations from the test guideline, namely testing doses lower than that needed to induce skin irritation, and therefore was also considered of limited reliability. Regarding human data, RAC agreed that it consisted only of reporting 'no cases

observed/reported' by a few companies rather than evidence from e.g. negative patch tests, therefore it cannot be usefully employed in a weight of evidence assessment.

In conclusion, contrary to the proposal by Sweden, RAC agreed on no classification of trimethoxy(methyl)silane as a skin sensitiser due to lack of conclusive data.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

5) sodium *N*-(hydroxymethyl)glycinate; [formaldehyde released from sodium *N*-(hydroxymethyl)glycinate]

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that sodium N-(hydroxymethyl)glycinate is a biocidal active substance used as preservatives for products during storage (PT 6 according to Biocidal Products Regulation, BPR). The legal deadline for the adoption of an opinion is 17 January 2019.

The substance has no existing entry in Annex VI to the CLP Regulation.

The DS (AT) proposed to classify the substance for acute oral toxicity (Acute Tox. 4; H302), skin and eye irritation, (Skin Irrit. 2; H315, Eye Irrit. 2; H319), skin sensitisation (Skin Sens. 1; H317) and as mutagen (Muta 2; H341) and carcinogen (Carc. 1B; H350). Notes 9 and 8 specifying the application of mutagenicity and carcinogenicity classifications for mixtures respectively, were also proposed by the DS.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for acute toxicity (dermal route of exposure), STOT RE, toxicity to reproduction, environmental hazards and hazardous to the ozone layer.

The Committee supported the DS proposal to classify sodium N-(hydroxymethyl)glycinate into category 4 for acute oral toxicity based on acute oral toxicity studies in rats with LD_{50} of 1 050 mg/kg bw/day and 1 070 mg/kg bw/day, respectively. RAC assigned an acute toxicity estimate (ATE) of 1 050 mg/kg for mixtures containing the substance. As regards acute toxicity via inhalation, RAC agreed on category 4 and an ATE of 3.0 mg/L.

RAC agreed to the DS proposal to classify the substance for skin sensitisation category 1 with a generic concentration limit (C ≥ 1%) which is in line with the previous classifications for formaldehyde releasers.

As regards eye damage, the available data (for powder and solution up to 50%) indicate that category 2 for eye irritation would apply. The RAC Members did not find the pH value argument, used in a tiered evaluation approach, strong enough to support more stringent classification and by weight of evidence agreed to classify sodium N-(hydroxymethyl)glycinate as eye irritant category 2 with generic concentration limit.

As to skin corrosion / irritation, RAC agreed that the available animal data showed only mild irritation at concentrations much lower than marketed. Given however that more irritation might be expected at higher concentrations and accounting for possible formaldehyde release, RAC by weight of evidence agreed to classify sodium N-(hydroxymethyl)glycinate as skin irritant category 2 with generic concentration limit. As for the eye-damage/irritation hazard, RAC Members pointed out that the proposal for higher classification based only on the pH would be inadequate. After the agreement, an industry representative informed that the substance, as marketed, was buffered. Had this information been available in the CLH-report, it would have assisted the discussion.

Given that sodium N-(hydroxymethyl)glycinate was not found to be skin corrosive, the use of

the additional hazard statement EUH071 "Corrosive to the respiratory tract" was not necessary but the STOT SE 3; H335 classification for respiratory tract irritation was considered warranted.

RAC Members agreed to classify sodium N-(hydroxymethyl)glycinate into category 2 for germ cell mutagenicity based on the positive in vitro studies and considering local genotoxic effect expected by formaldehyde (hydrolysis product) which has harmonised classification as mutagen category 2. Three RAC Members indicated a minority opinion disagreeing with the mutagenicity classification on similar grounds to previous minority positions expressed for formaldehyde itself and other formaldehyde releasing compounds.

RAC agreed to classify sodium N-(hydroxymethyl)glycinate for carcinogenicity category 1B based on the hydrolysis product, formaldehyde, which is a genotoxic carcinogen.

RAC adopted the opinion by simple majority. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

6) 4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5*H*)-one; flupyradifurone

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that flupyradifurone is a systemic insecticide against sucking insects like aphids and whitefly. The substance has no existing entry in Annex VI of the CLP Regulation thus in accordance with Article 36(2) of CLP all hazard classes need to be assessed. The legal deadline for the adoption of an opinion is 2 February 2019.

The DS (NL) proposed classification as Acute Tox. 4; H302, STOT RE 2; H373 (muscle), Repr. 2; H361, Aquatic Acute 1; H400 (M=10) and Aquatic Chronic 1; H410 (M=10).

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for physical hazards, acute toxicity (dermal and inhalation routes of exposure), eye corrosion / irritation, skin corrosion / irritation, germ cell mutagenicity, carcinogenicity and STOT SE, and classifications for Acute Tox. 4; H302 (ATE = 500 mg/kg bw), Aquatic Acute 1; H400 (M = 10) and Aquatic Chronic 1; H410 (M = 10).

RAC then discussed skin sensitisation, specific target organ toxicity after repeated exposure (STOT RE) and toxicity to reproduction. Following the submission of a negative Local Lymph Node Assay (LLNA) study by industry after the public consultation, supporting the available negative variant of the LLNA based on lymph node cell counts (LNCC), RAC concurred with the view of the rapporteurs and the DS that the substance does not fulfil the criteria for classification as skin sensitiser.

Regarding STOT RE, RAC discussed the flupyradifurone induced effects in dogs in repeated dose studies. These were characterised by weight loss and muscular atrophy / degeneration, associated with clear but transient changes in clinical chemistry parameters, below or around the guideline values for STOT RE 2. Several RAC members supported the proposal by the DS and the rapporteurs to classify the substance based on these effects in dogs. The expert accompanying the ECPA stakeholder observer noted that these effects were not observed in rats or mice at higher dose levels where no histopathological changes were found. She considered the observed effects as minimal to mild findings, which were possibly reversible. One RAC member responded that histopathological findings in muscles can be observed only after prolonged and severe impact. Another noted that the substance also caused associated changes in clinical chemistry parameters (creatinine kinase) and that it belongs to the class of neonicotinoid insecticides, designed to inactivate neuro-muscular junctions in insects. Another noted the absence of mode of action studies and the probable relevance to humans of these

effects. The Committee agreed with the proposal by the DS and the RAC rapporteurs to classify the substance as STOT RE 2; H373 (muscle).
With regard to reproductive toxicity the DS had proposed to classify the substance as Repr. 2; H361 with no differentiation between the effects on fertility and development. This was based on a two-generation study in rats due to (1) a reduced number of oestrous cycles of the F1 high dosed females in connection with (2) a reduced number of implantation sites and decreased litter size. These effects were found in dams with reduced body weight of 16 % in the pre-mating period. Such effects on oestrus cycle, implantation sites and pups were not observed in the parental generation which had a 5 % lower exposure during the pre-mating period. The body weight was also reduced but only for 10 % compared to the animals in the control group. It was noted that some findings could be considered as endocrine-mediated as also raised by the DS and may not necessarily be attributed to weight loss or decreased food consumption. However, the Committee supported the view that the observed effects are insufficient to fulfil the classification criteria for the reproductive toxicity.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

7) hymexazol (ISO); 3-hydroxy-5-methylisoxazole

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that hymexazol (ISO) is an active substance in plant protection products and is used as a fungicide. The legal deadline for the adoption of an opinion is 4 January 2019.

The substance has an existing entry in Annex VI to the CLP Regulation for Acute Tox 4*; H302, Eye Dam. 1; H318 and for hazards to the aquatic environment (Aquatic Chronic 3; H412).

The DS (FI) proposed to modify the existing classification for acute oral toxicity (=remove the asterisk) - Acute Tox. 4; H302, and for hazards to the aquatic environment – Aquatic Chronic 2; H411, to add classifications for skin sensitisation (Skin Sens. 1B; H317; following comments during the public consultation adjusted to Skin Sens. 1) and toxicity to reproduction (Repr. 2; H361d) and to retain the classification for serious eye damage (Eye Dam. 1; H318); the latter hazard class was not assessed in the CLH report.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: Acute Tox. 4; H302, with an ATE (oral) of 1 600 mg/kg bw, Skin Sens. 1; H317 and Aquatic Chronic 2; H411.

RAC agreed that no classification was warranted for acute toxicity via the dermal and inhalation routes of exposure.

RAC discussed toxicity to reproduction and noted that slightly prolonged gestation length observed at the highest dose (2 500 ppm) without maternal toxicity in two (GLP-compliant) rat generation studies were of lower concern and did not justify classification for fertility. Developmental effects in these generation studies included reduction in mean litter size at birth due to post-implantation losses.

Developmental toxicity was discussed by the Committee based on the effects seen in the generation studies and in developmental toxicity studies in two species (post-implantation losses, reduced number of live young and reduced litter size in rats and rabbits). One RAC Member further considered the subcutaneous haemorrhage in rats at the highest dose without maternal toxicity as an argument potentially supporting higher classification due to their consistent incidence at different sites. In response, the IND expert advised that haemorrhages at different sites were not considered substance-related but attributed to handling with animals.

RAC further discussed the effects in rabbits (incomplete inferior vena cava observed in four foetuses – one of which at middle dose without maternal toxicity and above historical control data). It was noted that two newer rabbit studies (2015) conducted to study maternal toxicity and possible relationship to the occurrence of incomplete inferior vena cava did not find this effect and thus lessen the concern for malformations. Considering the weight of evidence, RAC agreed to classify hymexazol (ISO) for developmental toxicity category 2, as Repr. 2; H361d.

8) 5-fluoro-1,3-dimethyl-*N*-[2-(4-methylpentan-2-yl)phenyl]-1*H*-pyrazole-4-carboxamide; penflufen

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting and reported that the substance is used as a fungicidal seed treatment on potatoes and is in the process of being evaluated to be used on wheat and barley. Penflufen is also in the process of being evaluated under Regulation (EU) 528/2012 for use as a biocide wood preservative in the EU. It has no existing entry in Annex VI to the CLP Regulation. The legal deadline for the adoption of an opinion is 4 January 2019.

The DS (UK) proposes to classify penflufen as Carc 2; H351, Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410 (M=1).

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for physical hazards, acute toxicity (all routes of exposure), STOT SE, skin irritation/corrosion, eye irritation/damage and germ cell mutagenicity, and classification as Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410, M=1.

RAC agreed on no classification for skin sensitisation as the only skin sensitisation study available was considered inconclusive due to a significant methodological deficiency (no pre-treatment with sodium lauryl sulphate to increase the sensitivity of the assay) and no other information on the skin sensitisation potential of penflufen had been provided.

Regarding STOT RE, RAC concluded (consistent with the conclusion of the DS) that no classification was warranted, because the findings observed were either not considered adverse (liver), were observed at doses above the guidance values (thyroid) or were considered incidental (pancreas).

The tumour profile seen for penflufen in rodent carcinogenicity studies was discussed. In rats, increased incidences of tumours were seen in the liver hepatocellular adenomas (benign), ovarian tubulostromal adenomas (benign), astrocytomas of the brain (malignant) and histiocytic sarcomas (malignant). In mice, low increases in the incidences of (rare) hepatocellular carcinomas of the liver (malignant) were seen. Also, mechanistic studies on CAR/PXR activation aimed to explain the mode of action (MoA) behind the liver tumours. Penflufen was negative in genotoxicity assays. RAC agreed that the evidence for carcinogenicity arising from all four tumour types seen in the animal models should be considered for the classification conclusion. RAC considered the malignant astrocytomas and histiocytic sarcomas in rats to amount to limited evidence of carcinogenicity. Concerning the liver tumours, although there were indications of CAR activation in the MoA studies, this was not considered to have been investigated adequately (in comparison with some previous cases where the CAR/PXR MoA had been considered by RAC). In particular, there were no studies using relevant transgenic knock-out mice or models with relevant humanised proteins or data to show that other MoA were not relevant. Although there were doubts about the lack of human relevance from the MoA data, the findings in the liver overall were not considered convincing. RAC considered the liver tumours supportive of classification, as well as the benign ovarian tumours. Concerning the ovarian tumours, the expert accompanying stakeholder confirmed that hormone levels were not measured in the study and

hence any role that these may have played in the development of these tumours was not known.

Considering the slightly increased tumour incidences, the sex and species specificity of the tumours that the substance is not genotoxic and the available MoA, albeit not conclusive, does not indicate specific concern for humans, RAC concluded that classification in Category 1B was not warranted. Overall, the data on all the tumour types observed in the studies was considered to point to limited evidence of carcinogenicity. Hence RAC concluded that penflufen should be classified as Carc. 2.

Regarding reproductive toxicity, RAC noted that reduced litter sizes were observed in the 2-generation study (by 11-13 %) consistently in both generations, which, although not statistically significant, were seen in the absence of maternal toxicity suggesting that this may be substance-related. The expert accompanying stakeholder provided a 1-generation dose range-finding study report which showed that also a higher dose of 7 000 (ppm) was tested with no indication of a dose-response relationship in the findings. It was noted that the mean pup body weight was reduced at the end of the lactation period, but as the maternal body weights were also reduced, the effect on pup body weight was considered likely to be secondary to maternal toxicity.

The developmental effects comprised malformations in the rabbit PNDT study. Low incidences of various malformations in all dose groups (including the control group) were seen in the rabbit PNDT with some being outside HCD, but no dose-response relationship was noted, hence these were not considered to be treatment related. Increased number of dead foetuses at the top dose was also observed, but according to the DS was mostly due to the litter from a single dam. Findings which suggested delayed sexual maturation at the highest dose were considered likely to be related to the lower body weights relative to the controls seen at this dose. In the two-generation study the highest dose was 4 000 (ppm) and RAC noted that dosing could have been too low.

RAC concluded that based on the available data, classification for either fertility, development or lactation was not warranted. RAC however noted that for fertility the available data might not fully inform on the reproductive toxicity of penflufen, due to too low dosing.

It was agreed that the scientific opinion of RAC justifying the proposed classifications will be revised in accordance with the discussion and the conclusions, submitted to RAC for consultation and the final opinion adopted via written procedure. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

9) 2-butoxyethanol; ethylene glycol monobutyl ether

The Chairman welcomed the expert accompanying the Cefic stakeholder observer attending the meeting. The Chairman reported that 2-butoxyethanol belongs to the group of glycol ethers, which are mainly used as solvents. It has a wide range of uses as a solvent in paints and surface coatings, detergents and surface cleaners, inks or dyes. The substance has an existing entry in Annex VI to the CLP Regulation as: Acute Tox. 4*; H332, Acute Tox. 4*; H312, Acute Tox. 4*; H302, Skin Irrit. 2; H315 and Eye Irrit. 2; H319. The legal deadline for the adoption of an opinion is 31 January 2019.

The DS (DE) proposes to retain the existing classification as Skin Irrit. 2; H315 and to modify the current classification as follows: Acute Tox. 4; H331 (ATE= 3 mg/L), Acute Tox. 3; H311 (ATE= 300 mg/kg bw), Acute Tox. 3; H302 (ATE= 500 mg/kg bw), Eye Dam. 1; H318 and to add STOT RE 2; H373 (blood).

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: skin irritation – Skin Irrit. 2, H315.

RAC discussed acute toxicity and appropriate ATE values for all three routes of exposure. For the oral route, RAC agreed that classification as Acute Tox. 4; H302 is warranted based on LD_{50} values from rats, mice, rabbits and Guinea pigs which all were within the classification criteria range for category 4 (300-2 000 mg/kg bw). The agreed ATE value of 1 200 mg/kg bw for the oral route is based on data on Guinea pigs as it is considered to be the species with a sensitivity closest to humans.

Regarding the dermal route, RAC questioned the validity of the dermal study in Guinea pigs (1965) with the lowest LD_{50} value, which would lead to classification in Category 3. It was noted that the study was not conducted according to current standards and the LD_{50} value was significantly lower in comparison with more recent studies, in both Guinea pigs and other species. RAC therefore took into account data obtained in other studies on Guinea pigs showing dermal LD_{50} above 2 000 mg/kg bw and agreed that classification for acute dermal toxicity is not warranted.

For the inhalation route, LC_{50} values from all three test species were within the classification criteria for category 3. The industry expert pointed out that the stated 4 hour LC_{50} for guinea pigs was above the saturated vapour concentration which, if true, would imply exposure to aerosol, and hence potentially no classification requirement, but RAC raised concern for the validity of this Guinea pig study as the exposure conditions were unclear. The one other study in guinea pigs was reliable and showed no adverse effects at the maximum achievable vapour concentration (~3mg/L) but only used an exposure of 1 hour. RAC noted that although it is preferred to use the same species for all routes when allocating ATE values, a case-by-case approach is needed to consider the reliability of data. Due to the unclarity in the Guinea pig study it was decided to use the standard ATE value from the CLP (3 mg/L). Hence, taking into consideration data from all available studies on rats, mice and Guinea pigs RAC agreed that classification as Acute Tox. 3; H331 is warranted with a standard ATE value of 3 mg/L.

Regarding eye irritation/damage, the DS proposed to revise the current classification of Eye Irrit. 2 to Eye Dam. 1 based on two *in vivo* studies in rabbits where effects had not fully reversed within an observation period of 21 days. RAC, however, argued that the severity of these effects was low, and their reversibility in the longer time period could not be excluded. RAC noted that in the rabbit study conducted to most modern standards, eyes were washed with water 24 hours after instillation. In this study the effects on the eyes were fully reversed within an observation period of 21 days. According to the OECD test guideline, eyes can be washed 24 hours after instillation if considered appropriate, and the study was thus considered to be valid. The reason for washing the eyes was however questioned and the industry expert explained that the eyewash was introduced to better present the human situation.

According to current testing strategies, results from *in vitro* tests can be used to support classification for Eye damage/irritation. For 2-butoxyethanol, as the results showed strong irritation only, these studies can be considered to support retaining the current classification. RAC took note that one *in vitro* test was not performed according to an OECD test guideline.

Taking the available data into account, RAC agreed to retain the current classification of Eye Irrit. 2 as the study conducted to most modern standards showed reversibility. It was noted that the dataset is not different from that discussed and agreed upon by TC C&L and that the criteria for reversibility have not changed since the last classification.

STOT RE 2 (blood) classification was proposed by the DS, based on strong haemolysis of erythrocytes in several studies in different species. It was questioned whether such findings in animals are relevant to human health and which studies with respect to study/exposure duration should be included when evaluating haemolytic effects. Rabbit together with rat and mouse are more sensitive to the observed haemolytic effects compared to humans and Guinea pigs who

both are remarkably resistant. The difference in species sensitivity is considered to be due to differences in sensitivity to the metabolite (BAA) that is reported to causes the effects. There is large dataset available for 2-butoxyethanol, with both longer- and shorter-term studies. For the studies with species most sensitive to the haemolytic effects, RAC concluded that the effects were not severe enough to meet the classification criteria. Hence no classification for STOT RE is warranted for these species nor for the less sensitive species (including humans).

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

10) geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that geraniol is commonly used as a fragrance in cosmetics and in various cleaning and maintenance products. The legal deadline for the adoption of an opinion is 10 March 2019.

The substance has no existing entry in Annex VI to the CLP Regulation.

The DS (DK) proposed to classify geraniol as Skin Sens. 1A; H317.

The Committee agreed that geraniol should be classified as a skin sensitiser based on animal data and human evidence. Exposure and potency information is then needed in order to decide on sub-categorization. Whereas some animal data showed low or moderate potency, other data were not detailed enough to allow to conclude on this aspect.

RAC members noted that in the human data, generally high frequencies of sensitization were observed at high exposure levels. However effects at lower exposure levels could not be ruled out and therefore the human data could not be used to support sub-categorisation either. In conclusion, RAC agreed to classify geraniol in category 1 for skin sensitisation, without sub-categorisation.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

11) dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]

The Chairman reported that dioctyltin dilaurate (DOTL) is used in the production of various products, e.g. adhesives, sealants, coatings and paints, leather tanning, as well as paper and board dye. It has no existing entry in Annex VI to the CLP Regulation. The legal deadline for the adoption of an opinion is 4 January 2019.

The dossier submitter (SE) proposed to classify DOTL for Repr. 1B; H360D and STOT RE 1; H372 (immune system).

Read-across from dichlorodioctylstannane (DOTC) was proposed based on structural similarity between the source and target substance. RAC agreed that read-across is justified by meeting the similarity principle criteria of having rapid hydrolysis with partly similar breakdown products (read-across limited to systemic endpoints via oral route), a similar breakdown product that is at least partially bioavailable and with the dioctyltin group being the toxic relevant component.

For Reproductive toxicity, RAC accepted the read-across from DOTC and thus agreed that those data supported the proposed classification of Repr. 1B; H360D. The information on other related dioctyltin chemicals were also considered to support classification for development. In view of uncertainties regarding the bioavailability, and therefore potency of DOTL, SCLs were not considered justified.

Regarding STOT RE, RAC concluded based on read across from DOTC that clear adverse effects

on the immune system were seen, and it was also noted that most organotin chemicals with an Annex VI entry are classified as STOT RE (immune system). The Rapporteur considered the DS proposal of STOT RE 1; H372 (immune system) most appropriate because of the high potency of DOTC/other organotin compounds and because even with the up to 10-fold lower potency proposed for DOTL compared to DOTC, the effects would still justify classification in Category 1. It was noted that the unknown DOTL hydrolysis products may also contribute to the toxicity. Members agreed that no SCL can be derived due to the difference in potency compared to DOTC.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

12) citral

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that citral is a fragrance used in cosmetics and a variety of household products for cleaning and maintenance. The legal deadline for the adoption of an opinion is 16 March 2019.

The substance has an existing entry in Annex VI to the CLP Regulation as Skin Irrit. 2; H315 and Skin Sens. 1; H317.

The DS (DK) proposed to modify the existing classification for skin sensitisation – with subcategorization as Skin Sens. 1A; H317 – and to retain the skin irritation classification.

In the discussion, RAC noted that the available animal data for citral indicate that it could be a strong sensitiser however, varying indications of potency do not allow to conclude on sub-categorisation. The human data could not support the sub-categorisation either as it showed high frequency of skin sensitisation with some uncertainties as to low or high exposure.

RAC confirmed the existing classification in category 1 for skin sensitisation, but concluded that the sub-categorisation cannot be determined.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

13) mesotrione (ISO); 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that mesotrione (ISO) is a systemic herbicide to control most annual broadleaf and annual grass weeds. The substance has a harmonised classification as Aquatic Acute 1; H400, Aquatic Chronic 1; H410. The legal deadline for the adoption of an opinion is 14 March 2019.

The DS (UK) proposed to retain Aquatic Acute 1; H400, Aquatic Chronic 1; H410 and to add STOT RE 2; H373 (kidneys), Repr. 2; H361d, and an M-factor of 10 for both Aquatic Acute and Aquatic Chronic classifications.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for germ cell mutagenicity and carcinogenicity, and classifications for Aquatic Acute 1; H400 (M = 10) and Aquatic Chronic 1; H410 (M = 10).

RAC then discussed specific target organ toxicity after repeated exposure (STOT RE) and toxicity to reproduction. On STOT RE hazard class the RAC discussed the rapporteurs' proposal for eye as a target organ. No eye effects were reported in the oral 28-day toxicity study in rats (mesotrione tested up to 2 464 mg/ kg) as no ophthalmoscopy was performed in the study. However, in the two guideline 90-day toxicity studies, ophthalmoscopy revealed moderate to marked corneal opacity and vascularisation in males at ≥ 0.71 mg/kg bw. After microscopic

examination, slight to moderate corneal keratitis were observed in 40 % of males dosed with 0.71 mg/kg bw and in 70-100 % of males rats at ≥ 11 mg/kg bw. A plateau of incidence was observed in males at ≥ 11 mg/kg bw as few animals did not respond at the top doses of 112 and 1 111 mg/kg bw. In females, incidence and severity was lesser than in males. Keratitis was observed at ≥ 12.5 mg/kg bw. Consistently, similar ocular findings at ophthalmoscopy were observed in two non-guideline 90-day dose-response studies in male and female rats and in a 90-day range-finding study investigating non-ocular endpoints. The rapporteurs noted that these findings of corneal toxicity are of relevance to humans. Inhibition of 4-hydroxyphenylpyruvate dioxygenase (HPPD) in the catabolism pathway of tyrosine is considered to be a relevant mode of action and RAC agreed to classify mesotrione (ISO) as STOT RE 2; H373 (eyes).

During the discussion of effects on kidney, the rapporteurs noted the following findings in the 90-day guideline studies: increased kidney weight, hydronephrosis (inside control of one of the two studies), chronic progressive glomerulopathy (CPG) but with low incidences and no dose-response/plateau. They considered that high severity of CPG only in male rats after 2-year exposure is not sufficient to trigger classification. And the Committee supported this view.

Sciatic nerve toxicity was observed in the 2-year study in male rats and to a lesser extent in females. This consisted of increased severity in demyelination of sciatic nerves and was not observed in shorter duration studies in rats, mice or dogs. It was acknowledged that in humans with primary deficiency of HPPD, central nervous system effects (e.g. neuronal demyelination) have also been reported. Moreover, impaired cognitive functioning has been observed with some patients treated with NTBC. Given the relevance of the mechanism to humans, RAC agreed to additionally classify the substance as STOT RE 2; H373 (nervous system).

The Committee based their opinion regarding sexual function and fertility on a three-generation study in rats, a single generation exacerbation study in rats, and a two-generation reproductive toxicity study in mice. Although effects in testis and in epididymis absolute weights were observed in both multigeneration studies in rats and mice, they were often not consistent between generations and without a dose-response relationship. Moreover, as the effects were not correlated with histopathological findings or fertility effects, these changes are not considered of sufficient concern for classification for toxicity to fertility and sexual function.

RAC members noted that three developmental toxicity studies were available (one in rats, one in rabbits and one in mice), in addition to a range-finding study in mice and mechanistic developmental study in rabbits.

In rabbits and mice, growth effects occurred without maternal toxicity. Based on exacerbation studies in rabbits, the skeletal variations were considered likely to be associated with tyrosinaemia. In the multigeneration study in rats, decreased growth, prenatal survival and litter size was observed. Moreover, bilateral hydronephrosis was increased in pups and adults in F1 and subsequent generations.

Overall, the growth and survival effects are not considered secondary to non-specific consequences of other toxic effects. The mode of action (increased tyrosinaemia) proposed for foetal skeletal effects and postnatal survival has been shown to be relevant to humans. Moreover, a direct effect of mesotrione cannot be excluded as some developmental effects were not investigated in exacerbation studies (e.g. kidney effects). As humans are less sensitive than rats, because of uncertainties on relative potency for developmental effects in human, RAC supported the views of the DS and the rapporteurs to classify mesotrione (ISO) as Repr. 2, H361d.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

14) mecetronium etilsulfate; *N*-ethyl-*N*,*N*-dimethylhexadecan-1-aminium ethyl sulfate; [MES]

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that MES is a biocidal active substance used as a disinfectant in human hygiene products. The active substance has not yet been approved under the BPR and has no existing entry in Annex VI to the CLP Regulation. The legal deadline for the adoption of an opinion is 4 November 2018.

The DS (PL) proposed to classify MES for Acute Tox 4; H302, Acute Tox 3; H311, Skin Corr. 1C; H314, Eye Dam 1; H318, Aquatic Acute 1; H400 (M=100) and Aquatic Chronic 1; H410 (M=10).

The Chairman reminded the Committee that human health hazards of Skin Corr. 1; H314, Eye Dam. 1; H318 and hazard code EUH071 were agreed at RAC-45.

RAC discussed the validity of the many ready biodegradation test studies presented in the dossier and concluded that there are no valid nor reliable studies convincingly showing the ready biodegradability of MES. On the contrary, many studies show lack of ready biodegradability. RAC also noted that in some test systems the degradation in the toxicity controls fulfil the validity of the OECD test guideline and inhibition did not influence the outcome of these test systems.

In their proposal, the DS noted the possibility of using read-across from closely related analogues to assess biodegradation. Although RAC agreed that read-across could have provided additional data, a better description and analysis of the structural analogues and their similarity would need to be provided to allow a valid read-across. As this was not provided in the dossier, it was not possible for RAC to make an assessment of this aspect. Therefore, RAC agreed that MES should be classified as not rapidly degradable.

Regarding bioaccumulation, RAC noted that due to the surface active nature of MES the reported water solubility value may be misleading (no information on critical micelle concentration is available) and therefore the log K_{ow} calculated from separate solubilities in water and n-octanol is not reliable. Consequently, in the absence of a measured BCF value for MES, a weight of evidence approach was applied. RAC agreed that MES is similar to other quaternary ammonium substances, therefore lower solubility in water and higher log K_{ow} values than those reported are probable, indicating a potential for bioaccumulation. The industry expert highlighted that log K_{ow} and QSARs are not reliable for these types of substances. Based on the small amount of information on structural analogues with BCF data, and uncertain applicability of the klipW model in the context of the CLP criteria, RAC concluded that MES has the potential for bioaccumulation for the purpose of classification.

RAC discussed the validity of available aquatic toxicity studies. Concerning aquatic acute toxicity, RAC agreed with the DS's proposal to base the acute classification of MES on the 72 h E_rC_{50} of 0.0039 mg a.i./L which was the theoretical time-weighted average concentration first obtained from OECD TG 201 and then adjusted retrospectively. It is also supported by Daphnia data with measured time-weighted average, which was also adjusted retrospectively. RAC agreed with the DS to classify MES as Acute Aquatic 1; H400 with an M-factor of 100.

Regarding chronic aquatic toxicity, the Rapporteur proposed to base the classification of MES on a 21 d EC_{10} of 0.00006 mg/L, with a time-weighted average concentration from a Daphnia magna reproduction test (OECD TG 211). The industry expert raised concerns as to whether the dose-response regression fitting was appropriate as all values at 100 % inhibition were used and the regression was not stopped at the first value of 100 % inhibition. This would lead to extrapolation of these values and a higher EC_{10}. However, RAC did not agree with this assessment of the regression that provides the key EC_{10}. Together, with the assumption that the alternative option of using NOEC values from other studies would lead to underestimating

the hazard, RAC concluded to follow the proposal to use the of EC_{10} (considering all data points). Based on the assumption that MES is not rapidly degradable under relevant environmental conditions and has a potential for bioaccumulation, RAC considers classification as Aquatic Chronic 1; H410 with an M-factor of 1000 warranted for MES.

In conclusion, RAC agreed to classify MES as Aquatic Acute 1; H400 (M=100) and Aquatic Chronic 1; H410 (M=1000).

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

15) pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1*H*)-thionato-.kappa.S]zinc

Watze de Wolf, replacing the Chairman of RAC Tim Bowmer for this agenda item, welcomed the expert accompanying the Eurometaux stakeholder observer and reported that zinc pyrithione is an active substance in biocidal products with wide range of uses. The substance has no existing Annex VI entry. The legal deadline for the adoption of an opinion is 21 November 2018.

The DS (SE) proposed to classify zinc pyrithione for acute oral toxicity (Acute Tox 3; H301), acute toxicity via inhalation (Acute Tox 2; H330), for serious eye damage (Eye Dam. 1; H318), for developmental toxicity (Repr. 1B; H360D), repeated dose toxicity (STOT RE 1; H372) and for environmental hazards (Aquatic Acute 1; H400, M-factor=1000, Aquatic Chronic 1; H410, M-factor=10 (adjusted to 100 following comments during the public consultation)).

At its 45th plenary meeting the Committee agreed to classify zinc pyrithione for the following human health hazards (Acute Tox 3; H301, ATE oral = 221 mg/kg bw, Acute Tox 2; H330, ATE inhalation = 0.14 mg/l, Eye Dam. 1; H318, STOT RE 1, H372, Repr. 1B; H360D).

Two new environmental studies were brought to the attention of RAC shortly before the RAC 45 plenary meeting and in accordance with the RAC 45 *Main Conclusions and Action Points* the final study reports (audited and GLP-compliant) were subject to a targeted public consultation.

The Rapporteur introduced the case and sought agreement on the issues presented below:

Concerning ready biodegradability, some concerns were raised on whether the substance can be concluded as rapidly degradable based on exclusion of one of the controls from the results in the Menzies (2017) biodegradation study, and the fate/ relevance of the non-organic/ metallic component of the substance (zinc) in the overall decision on rapid degradation. One RAC member suggested that as the Menzies (2017) study had been provided during the first public consultation and had not been available for scrutiny by Member States, it would be helpful to include a robust study summary as part of the final publicly available package for transparency.

RAC agreed that the impact of including in the results of the disregarded study control, that exceeded the concentration indicated in the respective OECD Guideline, would be very small and would not change the conclusion that the study results are valid and can be used to conclude on degradation.

RAC also agreed that the second biodegradation study, included in the original classification proposal, raised some concerns due to its setup, lack of inhibitory effects, and the shape of the degradation curve that cannot be explained with the information available.

On the treatment of the metallic component of the substance, RAC agreed that, for this specific case, the overall weight of evidence is sufficient to conclude on rapid degradation by use of the organic part of the substance alone. The evidence includes the chelating nature of the substance and the high activity shown by the organic component of the substance. The substance was,

therefore, treated as an organometallic one and the relevant ECHA Guidance was followed. In conclusion, RAC agreed that the substance can be considered as readily and, thus, rapidly degradable. However, RAC suggested that further guidance on assessing the biodegradation of organometallics might be helpful for future cases.

Concerning the validity of the newly submitted experimental aquatic toxicity studies (2018), subject to a targeted public consultation, RAC agreed that these studies (2018) are valid and reliable and can be considered as the key studies for the assessment of aquatic hazards of zinc pyrithione.

In line with the respective OECD Test Guideline, RAC agreed that 72 h is the more appropriate time point for the assessment of effects observed in these studies, additionally considering that the Guideline validity criteria for biomass exponential growth are not met at 48 h. Hence, RAC did not agree with one of the Stakeholders' argumentation to use the 48 h time point that fulfilled, in their opinion, the requirements for specific daily growth rates but not the ones for exponential growth factors.

Concerning the most reliable experimental studies, RAC concluded that, Goudie (2018), as the most conservative of the two new reliable experimental studies, is the study to base aquatic classification and M-factors on, for both acute and chronic aquatic hazards. Thus, RAC agreed that the substance merits to be classified as Aquatic Acute 1; H400 and Aquatic Chronic 1; H410 based on a 72 h EC_{50} value of 0.00088 mg/L and a 72 h EC_{10} value of 0.00068 mg/L for *Skeletonema costatum*, respectively. RAC also agreed to apply M-factors of 1000 (acute) and 10 (chronic), as the substance was concluded to be rapidly degradable.

A RAC member, supported by a Stakeholder, commented there is the need for a further generic look at the study design of toxicity tests conducted on substances that disappear rapidly from the test system, in light of a potential impact on chronic and acute M-factors. It was further proposed that this evaluation should preferably take place at international level.

A Stakeholder offered to submit Robust Study Summaries on the studies provided during and after the initial public consultation. The secretariat will consider how best to include these in the relevant case-documents for future reference.

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

16) Butanone oxime[4]

This dossier was carried over from RAC 46 and thus on the agenda of the RAC for second time. The substance originally had a harmonised classification and labelling entry in Annex VI of the CLP Regulation (Carc. 2; H351, Acute Tox. 4*; H312, Skin Sens. 1; H317, and Eye Dam. 1; H318).

At RAC-45 plenary meeting in June 2018 the Committee agreed to classify as Carc. 1B; H350, Acute Tox. 3; H301 (ATE = 100 mg/kg), Acute Tox. 4; H312 (ATE = 1 100 mg/kg), STOT SE 1; H370 (upper respiratory tract), STOT SE 3; H336, STOT RE 2; H373 (blood system), Skin Sens. 1; H317, Skin Irrit. 2; H315, Eye Dam. 1; H318.

Regarding the STOT RE hazard class the RAC agreed that the totality of the observed effects (consistency of effects across the studies and dose response) on the haematopoietic system is sufficient to classify the substance in category 2. RAC agreed to classify the substance as STOT RE 2; H373 (blood system). However, since the STOT RE hazard class was not open for

[4] This dossier was carried over from RAC-45 and was handled under Any Other Business at RAC-46 plenary.

commenting during the public consultation, in order to complete the process transparently, ECHA launched a targeted public consultation on this endpoint after the aforementioned plenary meeting.

The RAC rapporteur presented the outcome of the targeted public consultation. The Committee reconfirmed the classification of the substance as STOT RE 2; H373 (blood system).

RAC adopted the opinion by consensus. The Chairman thanked the Rapporteur for the presentation of the arguments and the Committee Members for their comments.

9. Restrictions

9.1 Restriction Annex XV dossiers

a) Conformity check and key issues discussion

1) PAHs in granules and mulches used as infill material

The Chairman welcomed the Dossier Submitter representatives from the Netherlands and the RAC Rapporteurs. He informed the participants that the restriction dossier had been submitted by the Netherlands on 20 July 2018, in cooperation with ECHA.

The representative of the Dossier Submitter provided an introductory presentation on the dossier. The restriction dossier focusses on granules and mulches used as infill material in synthetic turf pitches and in loose form on playgrounds and in sport applications. The basis for this dossier is a concern for human health resulting from current concentration limits for polycyclic aromatic hydrocarbons (PAHs) in End-of-Life Tyre (ELT) derived rubber infill granules used in synthetic turf pitches. The primary concern is to address risks to individuals playing and performing sports activities (e.g. football) on artificial turf pitches with rubber granules (rubber crumb) made of recycled tyres. Recent evaluations by RIVM (2017) and ECHA (2017) concluded that PAH levels found in granules on synthetic turf pitches currently in use are assessed to have a relatively low excess cancer risk. However the reports highlighted that the current concentration limits permitted in entry 28 of Annex XVII of REACH are insufficient for protecting those who come into contact with the granules and mulches while playing at sports facilities and playgrounds.

RAC members asked clarifying questions and provided some suggestions to the Dossier Submitter, who then explained for example, that in this restriction, "mulches" refers to mixtures produced from rubber or other materials in the form of thin slivers or nuggets. RAC members proposed to clarify the difference between granules and mulches in terms of exposure, to check the exposure during gardening in all the MS and not only in NL, and the effect on different vulnerable groups (in particular children) compared with adults.

The Rapporteurs presented the outcome of the conformity check and the recommendations to the Dossier Submitter, and proposed to the Committee that they consider **the dossier to be in conformity**. The Committee agreed that the dossier conforms to the Annex XV requirements. In addition, the Rapporteurs presented their key issues of the restriction proposal. The Chairman informed the Committee that the public consultation on this restriction proposal will be launched on 19 September 2018.

b) Opinion development

1) Substances used in tattoo inks and permanent make-up

The Chairman welcomed the representatives of the Dossier Submitter (from Denmark, Norway and ECHA). The restriction proposal was submitted by ECHA together with Denmark, Italy and Norway on 6 October 2017. The proposal aims to restrict the intentional use of certain substances in tattoo inks by imposing concentration limits for selected substances. These substances include those with harmonised classifications as carcinogenic, mutagenic, reprotoxic, skin sensitising/corrosive/irritant, eye damaging/irritant, selected azo colourants and primary aromatic amines, as well as other substances prohibited in cosmetic products (under the Cosmetic Products Regulation, (EC) 1223/2009) and selected impurities. A number of colourants, which do not currently have alternatives or where information is insufficient to demonstrate risk, are proposed to be exempted. Two restriction options (RO1 and RO2) with the same scope are proposed. They differ in terms of the proposed concentration limits and how the links with the Cosmetic Products Regulation annexes are managed. The public consultation on this dossier had ended on 20 June 2018.

The Rapporteurs presented the third draft opinion, including a report back from the RAC ad hoc WebEx which took place on 28 June 2018, where concentration limits for the several substances were concluded. The discussions continued in an ad hoc evening session, the conclusions of which were reported back to plenary on the following day and agreed.

RAC discussed the Rapporteurs' proposal in the third draft opinion with regard to the need for an EU-wide restriction.

RAC agreed that there are no relevant risk management measures to prevent exposure in the usual way due to the deliberate intradermal injection of tattoo inks. Therefore the only way to manage ~~the~~ risks from chemicals in tattoo inks is to limit their concentration. Furthermore, RAC agreed that there is a need for an EU-wide legal measure, as there is evidence that the existing regulatory risk management instruments are not sufficient and that the level of protection needs to be harmonized across the EU.

RAC agreed that a restriction under REACH is the most appropriate EU wide measure. More specifically, RAC supported the 'dynamic link' with the Cosmetic Products Regulation (CPR, i.e. substances added to Annex II) and to the Classification, Labelling and Packaging regulation (CLP, i.e. substances added to Part 3 of Annex VI, i.e. with harmonised classification as: carcinogenic, mutagenic and toxic to reproduction (CMR), Skin Sensitizers, skin irritants/corrosives, and eye irritants/corrosives), would be automatically brought into the scope of the restriction.

RAC supported the labelling requirements proposed by the Dossier Submitter. These are considered sufficient to facilitate implementation of the restriction as well as to permit investigation of exposure and risks linked with tattoo inks in the future.

RAC did not support the derogation of 19 colorants (i.e., banned in hair dyes under Annex II but allowed in all cosmetic products under Annex IV of the CPR) as proposed by the Dossier Submitter, noting that this had not been specifically requested by the tattoo industry and the limited information available on hazard and risk.

RAC agreed on the practical concentration limits for the following substances reprotoxic substances, polycyclic aromatic hydrocarbons, skin irritants & corrosives, eye irritants & damaging and copper, arsenic, barium, zinc and nickel. However, RAC did not manage to agree on a number of additional metal impurities and a proposed derogation for two key colourants, where further information was requested to be elaborated by the Rapporteurs.

The Chairman concluded that as three issues still needed to be agreed (heavy metal impurities, azo colourants and a proposed derogation on two phthalocyanine colourants), RAC was not ready to adopt the draft opinion at this meeting and would finalise and adopt at RAC 47 in November.

The Rapporteurs were requested to take the discussion of RAC-46 into account in the revised RAC opinion. A written RAC consultation round will be started on the further revised draft opinion. The Committee is expected to adopt the draft opinion in November 2018.

2) C9-C14 PFCAs, their salts and related substances

The Chairman welcomed the Dossier Submitter's representatives from Germany (following via WebEx). He informed the participants that the restriction dossier proposes to restrict the use, placing on the market and import of C9-C14 PFCAs, on their own or in a mixture or in an article or parts therein in a concentration equal to or above 25 ppb for the sum of C9-C14 PFCAs and their salts or 260 ppb for the sum of C9-C14 PFCA related substances. The Rapporteurs had developed the third draft opinion on this dossier, taking into account the discussion held at RAC-45 and the results of the public consultation (that ended on 20 June 2018), which was made available for written consultation prior to RAC-46 and no comments were received from RAC Members.

The Rapporteurs presented to the Committee the third draft opinion. They explained that human biomonitoring shows that the whole EU population is exposed to C9-C14 PFCAs and monitoring studies show the ubiquitous presence of the substances in the environment. Thus, exposure to humans and the environment takes place in all EU Member States. The Rapporteur suggested and RAC agreed that action is required on an EU-wide basis to address the risks associated with C9-C14 PFCAs including their salts and precursors. RAC also agreed that a restriction on a Union-wide basis is justified to reduce any potential release of these substances into the environment and to prevent any future manufacturing, placing on the market and use and that the proposed restriction is effective in reducing the identified risks. Furthermore, the Rapporteur explained that standard analytical methods to measure the content of C9-C14 PFCAs, their salts and the related substances, in articles and mixtures, are not yet available, but that methods being developed for the restriction of PFOA can be applied and thus the restriction can be considered practical and enforceable. One RAC Member confirmed that there are already several methods available, but that there is no standard method yet. RAC also agreed with the Rapporteurs that the proposed restriction can be considered monitorable, as there are methods available to monitor environmental and human health concentrations.

The Rapporteurs then reminded the Committee that the derogations for short-chain C6 fluorotelomers, 'second-hand' market and recycling were included in the proposal by the Dossier Submitter and proposed to RAC to agree with these. The Rapporteurs explained that several additional derogation requests were received within the public consultation. With regard to semiconductors, they proposed to RAC that taking into account very limited quantities made available on the EU market, RAC could consider the time limited derogation requested for this sector acceptable. With regard to fire-fighting foams, the Rapporteurs explained that RAC is not able to evaluate the releases from fire-fighting foams and notes that the releases are not insignificant and probably higher than estimated by the Dossier Submitter. However, derogations that are included in entry 68 of Annex XVII of REACH (PFOA), will also apply to C9-C14 PFCAs. Hence, the use of existing aqueous fire-fighting foams is not proposed to be restricted by this restriction proposal. A NGO Stakeholder representative asked the RAC Committee to consider recommending a time limit for the derogation to fire fighting foams, given that safer alternatives are already available and that the risk for human health and the environment of the continued use of foams containing C9-C14 PFCAs. In relation to fluoropolymers, the Rapporteurs found the evidence received in the public consultation

insufficient and thus proposed not to accept this additional derogation request. The company concerned can come back with further evidence during the public consultation on the SEAC draft opinion. With regard to pressurised metered-dose inhalers, the Rapporteurs proposed to accept the requested time-limited derogation because of the low volumes (few grams) involved and the important medical use. The Committee agreed with the views of the Rapporteurs regarding derogations.

RAC adopted its opinion on the restriction proposal on PFCAs by consensus. The Rapporteurs were requested, together with the Secretariat, to make the final editorial changes to the adopted RAC opinion and to ensure that the supporting documentation (Background Document and Responses to comments from the public consultation) is in line with the adopted RAC opinion. The Chairman thanked the Rapporteurs for their efficient and thorough handling of this restriction proposal, the Committee Members and the stakeholders for their contributions.

10. Authorisation

10.1 General authorisations issues

a) Update on incoming/future applications

The Secretariat informed the Committee that one new review report was received during the August 2018 submission window. It is the review report on the use of trichloroethylene (TCE) as an extraction solvent in caprolactam production. Key issues in the new review report will be discussed at RAC-47 plenary meeting in November 2018.

The Secretariat also informed that six new applications for authorisation are expected to be received during the November 2018 submission window. The Secretariat noted high increase in number of applications for authorisation to be received during 2019.

b) Committee Procedure for agreeing (parts of) opinions on applications for authorisation with scrutiny but without plenary debate

The Secretariat presented a meeting document RAC/46/2018/04 "Procedure for agreement seeking: Introduction of a differentiated approach to agreement and adoption of opinions on applications for authorisation of the Committee for Risk Assessment (RAC)".
This initiative by the Secretariat, is in response to the expected high number of applications for authorisations in 2019 and 2020. The main comment provided by members were related to the level of scrutiny of the opinions proposed for A-listing, e.g. what would be a sufficient number of comments received to consider the opinion as being 'well scrutinised'. The Secretariat responded that the number is not precise as it is influenced by several factors related to the type and degree of complexity of the dossier. However, it was noted that the number of comments on authorisation opinions from members during RAC consultations would need to increase in any case.

Another RAC member noted that A-listing in the CLP process is more straightforward because there is a number of hazard classes for the Committee to evaluate and some can be selected for plenary debate and others not. The dossiers in the CLH process are also different in that they are normally prepared by the Member States, and only occasionally by industry. This also means that the experts working for the Member States had already assessed the intrinsic properties of most of the substances. For biocides and pesticides, there has also been prior scrutiny in their approval process. On the other hand, when developing opinions on applications for authorisation the scope, particularly of downstream applications is somewhat narrower. A way forward could

be to identify from the standard sections of opinions what would be non-controversial and subject only these to A-listing procedures, while other sections may still be discussed at the plenary session. The Secretariat noted that the numbers of partial or complete authorisation opinions suitable for A-listing may be lower than under the CLH process.
Two representatives of the stakeholder organisations asked whether the proposed procedure to A-list some opinions would involve also stakeholders. They also noted that a justification to A-list the opinions should be clear, transparent and should have gone through a standardised review both by the RAC rapporteurs and the Committee members during the RAC consultation.

It was generally thought that the process could work better for repetitive-types of the applications for authorisation where the assessment routine is already well established. Following a question by one of the RAC members, representatives of the European Commission explained how the REACH Committee considers the opinions of the ECHA Scientific Committees. They stressed that every opinion has to be scrutinised to a sufficient level.
The importance of the early discussions, at the key issues stage, was stressed so that critical aspects with an impact on a decision to A-list or not , i.e. the entire dossiers that may go through A-listing procedures or the aspects requiring more scrutiny of other dossiers can then be identified.

RAC acknowledged the necessity of finding proper means to change the current opinion development procedure in order to manage high numbers of opinions and gave a cautious welcome to the proposals to A-list some dossiers.

The Secretariat took note of the plenary discussion. The document on the A-listing of the opinions on applications for authorisation will be modified accordingly and put on the agenda of the RAC-47 meeting in November 2018 for discussion and agreement. The secretariat reiterated that the intention was to introduce A-listing in Applications for authorisation on a pilot basis with a later review. The Chairman thanked the RAC members and the stakeholders for their valuable input in the discussion.

10.2 Authorisation applications

a) Discussion on key issues

The Secretariat in cooperation with the RAC Rapporteurs provided general information regarding the two new applications for authorisation received during the May 2017 submission window.

1. CT_MAHLE (1 use)

This is a downstream application for authorisation for the user of chromium trioxide in functional chrome plating of engine valves for automotive applications. It has a narrow scope and is well defined, covering one use in a closed process (one environmental contributing scenario (ECS), seven worker contributing scenarios (WCS)) at two sites in PL and DE. Number of workers exposed is 15 on one site and 17 on another. A quantity of 10-50 tonnes per year is used and a 12-year review period has been requested.

Both modelled and measured exposure data were provided. As presented by applicant, excess cancer risk for combined exposure is 0.44 µg Cr(VI)/m^3, from the combination of WCSs 2, 3, 4, and 5: 1.77 per 10 000 exposed workers. For humans via the environment excess lifetime risk for 70 years for lung cancer cases is 2.9×10^{-2} per µg Cr(VI)/m^3, and intestinal cancer cases 8.0×10^{-4} per µg Cr(VI)/kg bw/d.

The Secretariat in cooperation with the RAC Rapporteurs provided general information regarding this new application. They outlined the key issues identified by the Rapporteur and asked the Committee for comments and further suggestions. RAC will request further clarifications from the applicant as appropriate.

2. CT_Doosan (1 use)

This is a downstream application for authorisation for the industrial formulation of a chromium trioxide solution below 0.1% w/w concentration for the passivation of copper foil used in the manufacture of Lithium-Ion Batteries (LiB) for motorised vehicles. The application is for a future use in a plant that is yet to be built. It has a narrow scope and is well defined, covering one use in a mostly closed process (one ECS, four WCS one of which is out of the scope of Authorisation). The number of workers exposed is 25 and a quantity of 15 tonnes per year is planned to be used; a 15-year review period has been requested.

For one WCS a qualitative exposure assessment was provided, while for the others, modelled exposure data were provided. As presented by applicant, excess cancer risk for workers is estimated to be 1.6×10^{-8} to 1.0×10^{-7}, with no combined exposure foreseen. For humans via the environment locally exposure modelled concentration in water and air were provided (regional exposure considered not relevant) and an excess cancer risk through inhalation is calculated at 1.0×10^{-6}, through oral route of exposure 7.4×10^{-8}.

The Secretariat in cooperation with the RAC Rapporteurs provided general information regarding this new application. They outlined the key issues identified by the Rapporteur and asked the Committee for comments and further suggestions. RAC will request further clarifications from the applicant as appropriate.

b) Agreement on Draft Opinions

No items for agreement under this agenda item.

c) Adoption of final opinions

1. **DtC_Wesco (1 use)**
2. **SC_Wesco (1 use)**
3. **PCO_Aviall (2 uses)**

The Secretariat on behalf of the RAC rapporteurs presented the final opinions on the three upstream applications for authorisation.

The first application above is an upstream application submitted by Wesco Aircraft EMEA Limited on the use of dichromium tris(chromate) for chemical conversion coating applications by aerospace and defence companies and their associated supply chains. The scope of the application is relatively broad. The number of sites relevant for the application is > 100. Number of workers exposed > 10 000. The applicant requested a review period of 12 years. The substance is the main component in chemical conversion coatings used to provide corrosion resistance to the surface of an aeronautic vehicle or component. The level of containment of the process/tasks is generally low.

The second application above is an upstream application submitted by Wesco Aircraft EMEA Limited, Cytec Engineered Materials Ltd. OR and PPG Central (UK) Ltd. on the use of strontium chromate in primers applied by aerospace and defence companies and their associated supply

chains. The scope of the application is relatively broad. The number of sites relevant for the application is > 100. Number of workers exposed > 15 000. The applicants requested a review period of 12 years. The substance is the main component in primers. These are one layer out of several layers of coating applied (i.e. spraying and brushing) to the surface of an aeronautic vehicle or component. The level of containment for tasks and processes is generally low.

The third application above is an upstream application submitted by Aviall Services Inc and Finalin GmbH for two uses of pentazinc chromate octahydroxide: Use 1: Formulation of mixtures, Use 2: Use of pentazinc chromate octahydroxide in wash primer, fuel tank primer and aluminized primer for the purpose of corrosion protection in aeronautic applications. The scope of the application is relatively broad. The number of sites relevant for the application is < 5 for Use 1 and < 100 for Use 2. Number of workers exposed < 50 for Use 1 and < 1 000 for Use 2. The applicants requested a review period of 12 years. The substance is the main component in primers. Primers constitute one layer out of several layers of coating applied (i.e. spraying and brushing) to the surface of an aeronautic vehicle or component. For both uses, the level of containment is low.

The applicants provided comments on the draft opinions. The Secretariat informed RAC that the rapporteurs had made some editorial changes based on the comments received, but that the changes did not affect the conclusions. Changes also have been introduced to various parts of the opinions to provide better description of the uncertainties regarding the workers' exposure assessment. In the case of PCO_Aviall, the text related to uncertainties of releases to water has been deleted in different sections of the opinion on Use 2, as the applicants had informed that there is no release from the spray applications to wastewater under normal operational circumstances. The same opinion (PCO_Aviall on Use 2) has been re-worded in Section 9 to clarify that individual downstream users are obliged to prepare detailed summaries of the measurement campaigns, and of the review of the risk management measures and operational conditions.

During the brief discussion, some RAC members acknowledged the consistency of these four RAC opinions with the Committee opinions on the similar, earlier upstream applications for authorisation. RAC adopted the final opinions with the changes and clarifications in justification and conditions of the draft opinions following the Applicant's comments.

4. CT_Hapoc (2 uses)

The RAC rapporteurs presented the final opinions on the upstream application for authorisation.

The application is an upstream application submitted by HAPOC GmbH & Co KG on two uses of chromium trioxide: Use 1 Use of chromium trioxide in dissolved and solid form to produce aqueous solutions of any composition for industrial application, and Use 2: Use of chromium trioxide in solid form and in aqueous solution of any composition to modify the properties of surfaces made of metal or plastic, with or without current flow. The scope of the application is broad.

The applicant had provided comments on the draft opinions. The RAC rapporteurs informed the Committee that they had implemented only minor editorial changes based on the comments received in the opinion on Use 2 and that no substantial changes had been seen as warranted.

RAC adopted the two final opinions with the editorial changes of the draft opinions following the Applicant's comments.

10.3 Review reports

None.

11. AOB

See agenda point 8 b) 16.

14 September 2018

Part II. Conclusions and action points

MAIN CONCLUSIONS & ACTION POINTS

RAC 46 10 – 14 September 2018

(Adopted at the meeting)

Agenda point	
Conclusions / agreements / adoptions	**Action requested after the meeting (by whom/by when)**
2. Adoption of the Agenda	
The Agenda (**RAC/A/46/2018**) was adopted.	**SECR** to upload the adopted Agenda to the RAC CIRCABC and to the ECHA website as part of the RAC-46 minutes.
4. Appointment of (co-)rapporteurs	
a) Appointment of (co-)rapporteurs for CLH dossiers, restriction dossiers, authorisation applications, DNEL/dose-response relationships, Article 95(3) requests and Article 77(3)(c) requests	
5. Report from other ECHA bodies and activities	
a) Report on RAC 45 action points, written procedures and other ECHA bodies **SECR** presented document **RAC/46/2018/01.**	**SECR** to upload the document to the CIRCABC non-confidential website.
b) RAC work plan for all processes	
c) Annual update of RAC accredited stakeholders' list **SECR** presented document **RAC/46/2018/02]**	
d) General RAC-procedures **SECR** presented document **RAC/46/2018/03]**	
6. Requests under Article 77 (3)(c)	
1) Proposal on a derogation to the PFOA restriction	**Rapporteur** to make final editorial changes to the adopted RAC opinion.

Rapporteur presented and RAC discussed the revised draft opinion. RAC adopted the opinion on this Article 77 (3)(c) request by consensus.	**SECR** to forward the adopted RAC and SEAC opinions to COM and to publish on the ECHA website.
7. Requests under Article 95 (3)	
-	
8. Harmonised classification and labelling (CLH)	
8.1 General CLH issues	
-	

8.2 CLH dossiers

A. Substances with hazard classes for agreement by A-listing following the usual scrutiny but without plenary debate

- flupyradifurone: physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, STOT SE, germ cell mutagenicity, carcinogenicity, environmental hazards
- tribenuron-methyl (ISO): physical hazards (flammable solids, pyrophoric solids, emission of flammable gases), acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT SE, germ cell mutagenicity, toxicity to reproduction, environmental hazards
- dichlorodioctylstannane: acute toxicity (inhalation route of exposure)
- sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]: acute toxicity (dermal route of exposure), STOT RE, toxicity to reproduction, environmental hazards, ozone layer
- hymexazol (ISO): acute toxicity (oral route of exposure), skin sensitisation, environmental hazards
- 5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen: physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, STOT SE, germ cell mutagenicity, environmental hazards
- 2-butoxyethanol; ethylene glycol monobutyl ether: skin corrosion / irritation
- mesotrione (ISO): germ cell mutagenicity, carcinogenicity, environmental hazards

B. Substances with hazard classes for agreement in plenary session

1. tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate
2. dichlorodioctylstannane
3. lead
4. trimethoxy(methyl)silane
5. sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]
6. 4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone
7. hymexazol (ISO); 3-hydroxy-5-methylisoxazole
8. 5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen
9. 2-butoxyethanol; ethylene glycol monobutyl ether

10. geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol
11. dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]
12. citral
13. mesotrione (ISO); 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione
14. mecetronium etilsulfate; N-ethyl-N,N-dimethylhexadecan-1-aminium ethyl sulfate; [MES] – *ENV only*
15. pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc – *ENV only*
16. butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime – *STOT RE*

1. tribenuron-methyl (ISO);	
RAC adopted <u>by simple majority</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Skin Sens. 1; H317, STOT RE 2; H373, Aquatic Acute 1; H400 (M = 100), Aquatic Chronic 1; H410 (M = 100)]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
2. dichlorodioctylstannane	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Acute Tox. 2; H330 (inhalation ATE=0.0975 mg/L), Repr. 1B; H360D (SCL ≥ 0.03 %)]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
3. lead	
RAC discussed the environmental hazards of lead proposal for the harmonised classification and labelling. Further discussion and adoption of the opinion is scheduled for RAC-47. [Table 2]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** will table the case for further discussion and adoption at RAC 47. **SECR** to prepare an overview of previously agreed metal cases.
4. trimethoxy(methyl)silane	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below.	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.

[no classification]	**SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
5. sodium N-(hydroxymethyl)glycinate	
RAC adopted <u>by simple majority*</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Carc. 1B; H350, Muta 2; H341, Acute Tox. 4; H302 ATE(oral) = 1050 mg/kg bw, Acute Tox. 3; H332 ATE (inhalation) = 3,0 mg/L, Skin Irrit. 2; H315, Eye Irrit. 2; H319, STOT SE 3; H335, Skin Sens. 1; H317 Note 8, Note 9] *three Members indicated minority position with regard to classification for mutagenicity	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
6. Flupyradifurone	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Acute Tox. 4; H302 (Oral ATE=500 mg/kg bw), STOT RE 2; H373 (muscle), Aquatic Acute 1; H400 (M=10), Aquatic Chronic 1; H410 (M=10)]	**SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
7. hymexazol (ISO);	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Repr. 2; H361d, Acute Tox. 4, H302, ATE(oral) = 1600 mg/kg bw, Skin Sens. 1, H317, Aquatic Chronic 2; H411]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
8. penflufen	
RAC agreed on the harmonised classification and labelling as indicated in Table 1 below. [Carc. 2; H351,	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.

Aquatic Acute 1; H400 (M = 1), Aquatic Chronic 1; H410 (M=1)]	**SECR** to put the revised draft opinion for the RAC consultation and adoption via written procedure. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
9. 2-butoxyethanol	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Acute Tox. 3; H331 (ATE= 3 mg/L), Acute Tox. 4, H302 (ATE= 1200 mg/kg bw), Eye Irrit. 2; H319, Skin Irrit. 2; H315]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
10. Geraniol	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Skin Sens. 1; H317]	**Rapporteur** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
11. dioctyltin dilaurate	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Repr. 1B; H360D, STOT RE 1; H372 (immune system)]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
12. Citral	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Skin Sens. 1; H317]	**Rapporteur** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs.

	SECR to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
13. mesotrione (ISO)	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Repr. 2; H361d, STOT RE 2; H373 (eyes, nervous system), Aquatic Acute 1; H400 (M=10), Aquatic Chronic 1; H410 (M=10)]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
14. mecetronium etilsulfate	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Aquatic acute 1; H400 (M=100), Aquatic chronic 1; H410 (M=1000)] Agreed at RAC 45: [Skin Corr. 1; H314, Eye Dam. 1; H318 and EUH071 (corrosive to the respiratory tract)]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
15.pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Aquatic Acute 1; H400, M-factor=1000 and Aqumatic Chronic 1; H410, M-factor=10] Agreed at RAC 45: [Acute Tox 3; H301, ATE oral = 221 mg/kg bw, Acute Tox 2; H330, ATE inhalation = 0.14 mg/l, Eye Dam. 1; H318, STOT RE 1, H372, Repr. 1B; H360D]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
16. Butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Carc. 1B; H350, Acute Tox. 3; H301 (ATE = 100 mg/kg), Acute Tox. 4; H312 (ATE = 1 100 mg/kg), STOT SE 1; H370 (upper respiratory tract), STOT SE 3; H336, STOT RE 2; H373 (blood system), Skin Sens. 1; H317, Skin Irrit. 2; H315, Eye Dam. 1; H318]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **SECR** to make an editorial check of the opinion documents in consultation with the Rapporteurs. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
9. Restrictions	
9.1 Restriction Annex XV dossiers	

a) Conformity check and key issues discussion	
1. Plastic and rubber granulates containing PAHs RAC agreed that the dossier conforms to the Annex XV requirements. RAC took note of the recommendations to the dossier submitter.	**SECR** to compile the RAC and SEAC final outcomes of the conformity check and upload this to S-CIRCABC IG. **SECR** to inform the dossier submitter on the outcome of the conformity check.
b) Opinion development	
1. Substances used in tattoo inks and permanent make-up Rapporteurs presented and RAC discussed the third draft opinion. RAC agreed that RMMs and OCs do not have relevance to the intradermal injection of tattoo inks, therefore only way to manage the risk related to tattooing is to limit the content of potentially hazardous substances in the inks. RAC agreed that there is a need for an EU-wide legal measure, as there is evidence that the existing regulatory risk management instruments are not sufficient. RAC agreed that there is a justification that action is required on an EU wide measure to harmonise level of protection across the EU, and to decrease non-compliance. RAC agreed that a restriction under REACH is the most appropriate EU wide measure. RAC supported the dynamic link with CPR (i.e. substances added to Annex II of CPR) and supported dynamic link to Part 3 of Annex VI of Regulation (EC) No 1272/2008 (i.e. substances with relevant harmonised classification (CMR, SS, skin irritants/corrosives, eye damaging/irritants) are automatically in the scope). RAC did not support to derogate 19 additional colorants proposed by Dossier Submitter. RAC supported the labelling requirements proposed by the Dossier Submitter. They are sufficient to facilitate implementation of the restriction as well as to permit investigation of exposure and risks linked	**Rapporteurs** to update the draft opinion, taking into account RAC-46 discussions, by mid-October 2018. **SECR** to arrange a written commenting round on the draft opinion prior to RAC-47 and to table it for RAC-47 for adoption.

with tattoo in the future. RAC agreed on the practical concentration limits for the following substances: o Repro substances. o PAHs o Irritants & corrosives o Impurities: ▪ Copper ▪ Arsenic ▪ Barium ▪ Zinc ▪ Nickel	
2. C9-C14 PFCAs, their salts and related substances Rapporteurs presented and RAC discussed the third draft opinion. RAC adopted the opinion on this restriction proposal by consensus.	**Rapporteurs** to make final editorial changes to the adopted RAC opinion. **Rapporteurs**, together with **SECR**, to ensure that the supporting documentation (BD and RCOM) is in line with the adopted RAC opinion. **SECR** to forward the adopted opinion and its supporting documentation to SEAC.
10. Authorisation	
10.1 General authorisation issues	
a) Update on incoming/future applications	
RAC noted the information presented by the Secretariat.	
b) Committee Procedure for an A-list agreement opinions on applications for authorisation	
RAC reviewed the document RAC/46/2018/04 "Procedure for agreement seeking: Introduction of a differentiated approach to agreement and adoption of opinions on applications for authorisation of the Committee for Risk Assessment (RAC)".	SECR to consider comments received during the plenary discussion and review the draft document. SECR to present the updated document at the November 2018 plenary meeting for discussion and agreement.
10.2 Authorisation applications	
a) Discussion on key issues	
1. CT_MAHLE (1 use) **2. CT_Doosan (1 use)**	

ECHA Secretariat presented the key issues in the applications for authorisation.	
b) Agreement on Draft Opinions	
-	
c) Adoption of final opinions	
1. DtC_Wesco (1 use) RAC adopted by consensus the final opinion with changes and clarifications in justification and conditions of the draft opinion following the Applicant's comments.	**Rapporteurs** together with **SECR** to do the final editing of the opinion. **SECR** to send the final opinion to the EC, MSs and the Applicant.
2. SC_Wesco (1 use) RAC adopted by consensus the final opinion with changes and clarifications in justification and conditions of the draft opinion following the Applicant's comments.	**Rapporteurs** together with **SECR** to do the final editing of the opinion. **SECR** to send the final opinion to the EC, MSs and the Applicant.
3. PCO_Aviall (2 uses) <u>Use 1</u> RAC adopted by consensus the final opinion with no changes in the draft opinion following the Applicant's comments. <u>Use 2</u> RAC adopted by consensus the final opinion with changes and clarifications in justification and conditions of the draft opinion following the Applicant's comments.	**Rapporteurs** together with **SECR** to do the final editing of the opinion. **SECR** to send the final opinion to the EC, MSs and the Applicant.
4. CT_Hapoc (2 uses) <u>Use 1</u> RAC adopted by consensus the final opinion with no changes in the draft opinion following the Applicant's comments. <u>Use 2</u> RAC adopted by consensus the final opinion with changes and clarifications in justification and conditions of the draft opinion following the Applicant's comments.	**Rapporteurs** together with **SECR** to do the final editing of the opinion. **SECR** to send the final opinion to the EC, MSs and the Applicant.
10.3 Review Reports	
-	
11. AOB	
12. Action points and main conclusions of RAC-46	

SECR to upload the adopted action points to CIRCA BC.

Table 1: CLH opinions which were adopted at RAC-46

1. **mecetronium etilsulfate (partly agreed at RAC-45)**
2. **butanone oxime (partly agreed at RAC-45)**
3. **zinc pyrithione (partly agreed at RAC-45)**
4. **citral**
5. **geraniol**
6. **flupyradifurone**
7. **dichlorodioctylstannane**
8. **dioctyltin dilaurate**
9. **2-butoxyethanol**
10. **tribenuron-methyl (ISO)**
11. **mesotrione (ISO)**
12. **hymexazol (ISO)**
13. **sodium N-(hydroxymethyl)glycinate**
14. **trimethoxy(methyl)silane**
15. **penflufen**

1. Mecetronium etilsulfate

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	mecetronium etilsulfate; *N*-ethyl-*N*,*N*-dimethylhexadecan-1-aminium ethyl sulfate; mecetronium ethyl sulphate; [MES]	221-106-5	3006-10-8	Acute Tox. 3 Acute Tox. 4 Skin Corr. 1C Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H311 H302 H314 H318 H400 H410	GHS05 GHS06 GHS09 Dgr	H311 H302 H314 H410		M=100 M=10	
RAC opinion	TBD	mecetronium etilsulfate; *N*-ethyl-*N*,*N*-dimethylhexadecan-1-aminium ethyl sulfate; mecetronium ethyl sulphate; [MES]	221-106-5	3006-10-8	Skin Corr. 1 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H314 H318 H400 H410	GHS05 GHS09 Dgr	H314 H410	EUH071	M=100 M=1000	
Resulting Annex VI entry if agreed by COM	TBD	mecetronium etilsulfate; *N*-ethyl-*N*,*N*-dimethylhexadecan-1-aminium ethyl sulfate; mecetronium ethyl sulphate; [MES]	221-106-5	3006-10-8	Skin Corr. 1 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H314 H318 H400 H410	GHS05 GHS09 Dgr	H314 H410	EUH071	M=100 M=1000	

2. Butanone oxime

Existing Annex VI entry (CLP, Table 3.1)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	616-014-00-0	butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime	202-496-6	96-29-7	Carc. 2 Acute Tox. 4* Eye Dam. 1 Skin Sens. 1	H351 H312 H318 H317	GHS08 GHS05 GHS07 Dgr	H351 H312 H318 H317			
Dossier submitters proposal	616-014-00-0	butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime	202-496-6	96-29-7	**Modify** Carc. 1B Acute Tox. 4 Skin Sens. 1B **Retain** Eye Dam. 1 **Add** Acute Tox. 3 STOT SE 3	**Modify** H350 **Retain** H312 H318 H317 **Add** H301 H336	**Retain** GHS08 GHS05 Dgr **Add** GHS06 **Remove** GHS07	**Modify** H350 **Retain** H312 H318 H317 **Add** H301 H336		**Add** oral: ATE = 100 mg/kg bw dermal: ATE = 1100 mg/kg bw	
RAC opinion	616-014-00-0	butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime	202-496-6	96-29-7	**Retain** Eye Dam. 1 Skin Sens. 1 **Modify** Carc. 1B Acute Tox. 4 **Add** Acute Tox. 3 Skin Irrit. 2 STOT SE 3 STOT SE 1 STOT RE 2	**Retain** H312 H318 H317 **Add** H301 H315 H336 H370 (upper respiratory tract) H373 (blood system)	**Retain** GHS08 GHS05 Dgr **Add** GHS06 **Remove** GHS07	**Retain** H312 H318 H317 **Add** H301 H315 H336 H370 (upper respiratory tract) H373 (blood system)		**Add** oral: ATE = 100 mg/kg bw dermal: ATE = 1100 mg/kg bw	

						Modify H350		**Modify** H350			
Resulting Annex VI entry if agreed by COM	616-014-00-0	butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime	202-496-6	96-29-7	Carc. 1B Acute Tox. 4 Acute Tox. 3 STOT SE 3 STOT SE 1 STOT RE 2 Skin Irrit. 2 Eye Dam. 1 Skin Sens. 1	H350 H312 H301 H336 H370 (upper respiratory tract) H373 (blood system) H315 H318 H317	GHS08 GHS06 GHS05 Dgr	H350 H312 H301 H336 H370 (upper respiratory tract) H373 (blood system) H315 H318 H317		oral: ATE = 100 mg/kg bw dermal: ATE = 1100 mg/kg bw	

3.Zinc pyrithione

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard state-ment Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc	236-671-3	13463-41-7	Repr. 1B Acute Tox. 2 Acute Tox. 3 STOT RE 1 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H360D H330 H301 H372 H318 H400 H410	GHS08 GHS06 GHS05 GHS09 Dgr	H360D H330 H301 H372 H318 H410		M=1000 M=10	
RAC opinion	TBD	pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc	236-671-3	13463-41-7	Repr. 1B Acute Tox. 2 Acute Tox. 3 STOT RE 1 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H360D H330 H301 H372 H318 H400 H410	GHS08 GHS05 GHS06 GHS09 Dgr	H360D H330 H301 H372 H318 H410		oral: ATE = 221 mg/kg bw inhalation: ATE = 0.14 mg/l (dusts and mists) M=1000 M=10	
Resulting Annex VI entry if agreed by COM	TBD	pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc	236-671-3	13463-41-7	Repr. 1B Acute Tox. 2 Acute Tox. 3 STOT RE 1 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H360D H330 H301 H372 H318 H400 H410	GHS08 GHS06 GHS05 GHS09 Dgr	H360D H330 H301 H372 H318 H410		oral: ATE = 221 mg/kg bw inhalation: ATE = 0.14 mg/l (dusts and mists) M=1000 M=10	

4. Citral

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	605-019-00-3	citral	226-394-6	5392-40-5	Skin Irrit. 2 Skin Sens. 1	H315 H317	GHS07 Wng	H315 H317			
Dossier submitters proposal	605-019-00-3	citral	226-394-6	5392-40-5	Skin Irrit. 2 Modify Skin Sens. 1A	H315 H317	GHS07 Wng	H315 H317			
RAC opinion	605-019-00-3	citral	226-394-6	5392-40-5	Skin Irrit. 2 Retain Skin Sens. 1	H315 H317	GHS07 Wng	H315 H317			
Resulting Annex VI entry if agreed by COM	605-019-00-3	citral	226-394-6	5392-40-5	Skin Irrit. 2 Skin Sens. 1	H315 H317	GHS07 Wng	H315 H317			

5. Geraniol

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol	203-377-1	106-24-1	Skin Sens. 1A	H317	GHS07 Wng	H317			
RAC opinion	TBD	geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol	203-377-1	106-24-1	Skin Sens 1	H317	GHS07 Wng	H317			
Resulting Annex VI entry if agreed by COM	TBD	geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol	203-377-1	106-24-1	Skin Sens 1	H317	GHS07 Wng	H317			

6. Flupyradifurone

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	607-RST-VW-Y	4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone	-	951659-40-8	Repr. 2 Acute Tox. 4 STOT RE 2 Aquatic Acute 1 Aquatic Chronic 1	H361 H302 H373 (muscle) H400 H410	GHS08 GHS07 GHS09 Wng	H361 H302 H373 (muscle) H410		M=10 M=10	
RAC opinion	607-RST-VW-Y	4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone	-	951659-40-8	Acute Tox. 4 STOT RE 2 Aquatic Acute 1 Aquatic Chronic 1	H302 H373 (muscle) H400 H410	GHS07 GHS08 GHS09 Wng	H302 H373 (muscle) H410		oral: ATE = 500 mg/kg bw M=10 M=10	
Resulting Annex VI entry if agreed by COM	607-RST-VW-Y	4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone	-	951659-40-8	Acute Tox. 4 STOT RE 2 Aquatic Acute 1 Aquatic Chronic 1	H302 H373 (muscle) H400 H410	GHS07 GHS08 GHS09 Wng	H302 H373 (muscle) H410		oral: ATE = 500 mg/kg bw M=10 M=10	

7. Dichlorodioctylstannane

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	050-021-00-4	dichlorodioctylstannane	222-583-2	3542-36-7	Acute Tox. 3* STOT RE 1 Aquatic Chronic 3	H331 H372** H412	GHS06 GHS08 Dgr	H331 H372** H412			
Dossier submitters proposal	050-021-00-4	dichlorodioctylstannane	222-583-2	3542-36-7	**Retain** STOT RE 1 Aquatic Chronic 3 **Add** Repr. 1B **Modify** Acute Tox. 2	**Retain** H372** H412 **Add** H360D **Modify** H330	**Retain** GHS08 GHS06 Dgr	**Retain** H372** H412 **Add** H360D **Modify** H330		**Add** Repr. 1B; H360D: C ≥ 0,03%	
RAC opinion	050-021-00-4	dichlorodioctylstannane	222-583-2	3542-36-7	**Retain** STOT RE 1 Aquatic Chronic 3 **Add** Repr. 1B **Modify** Acute Tox. 2	**Retain** H372** H412 **Add** H360D **Modify** H330	**Retain** GHS08 GHS06 Dgr	**Retain** H372** H412 **Add** H360D **Modify** H330		**Add** Repr. 1B; H360D: C ≥ 0,03%inhalation: ATE = 0,0975 mg/L (dust and mist)	
Resulting Annex VI entry if agreed by COM	050-021-00-4	dichlorodioctylstannane	222-583-2	3542-36-7	Repr. 1B Acute Tox. 2 STOT RE 1 Aquatic Chronic 3	H360D H330 H372** H412	GHS08 GHS06 Dgr	H360D H330 H372** H412		Repr. 1B; H360D: C ≥ 0,03% inhalation: ATE = 0,0975 mg/L (dusts and mists)	

8. Dioctyltin dilaurate

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitter's proposal	050-RST-VW-Y	dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]	222-883-3 [1] 293-901-5 [2]	3648-18-8 [1] 91648-39-4 [2]	Repr. 1B STOT RE 1	H360D H372 (immune system)	GHS08 Dgr	H360D H372 (immune system)			
RAC opinion	050-RST-VW-Y	dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]	222-883-3 [1] 293-901-5 [2]	3648-18-8 [1] 91648-39-4 [2]	Repr. 1B STOT RE 1	H360D H372 (immune system)	GHS08 Dgr	H360D H372 (immune system)			
Resulting Annex VI entry if agreed by COM	050-RST-VW-Y	dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]	222-883-3 [1] 293-901-5 [2]	3648-18-8 [1] 91648-39-4 [2]	Repr. 1B STOT RE 1	H360D H372 (immune system)	GHS08 Dgr	H360D H372 (immune system)			

9.2-butoxyethanol

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	603-014-00-0	2-butoxyethanol; ethylene glycol monobutyl ether; butyl cellosolve	203-905-0	111-76-2	Acute Tox. 4* Acute Tox. 4* Acute Tox. 4* Skin Irrit. 2 Eye Irrit. 2	H332 H312 H302 H315 H319	GHS07 Wng	H332 H312 H302 H315 H319			
Dossier submitter's proposal	603-014-00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203-905-0	111-76-2	**Retain** Skin Irrit. 2 **Add** STOT RE 2 **Modify** Acute Tox. 3 Acute Tox. 3 Acute Tox. 4 Eye Dam. 1	**Retain** H302 H315 **Add** H373 (blood) **Modify** H331 H311 H318	**Add** GHS08 GHS05 GHS06 Dgr **Remove** GHS07 Wng	**Retain** H302 H315 **Add** H373 (blood) **Modify** H331 H311 H318		**Add** inhalation: ATE = 3 mg/L dermal: ATE = 300 mg/kg bw oral: ATE = 500 mg/kg bw	
RAC opinion	603-014-00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203-905-0	111-76-2	**Retain** Skin Irrit. 2 Eye Irrit. 2 **Modify** Acute Tox. 3 Acute Tox. 4 **Remove** Acute Tox. 4*	**Retain** H302 H315 H319 **Modify** H331 **Remove** H312	**Add** GHS06 **Retain** Wng **Modify** Dgr **Remove** GHS07	**Retain** H302 H315 H319 **Modify** H331 **Remove** H312		**Add** inhalation: ATE = 3 mg/L (vapour) oral: ATE = 1200 mg/kg bw	
Resulting Annex VI entry if	603-014-00-0	2-butoxyethanol; ethylene glycol monobutyl ether	203-905-0	111-76-2	Acute Tox. 3 Acute Tox. 4 Skin Irrit. 2	H331 H302 H315	GHS06Dgr	H331 H302 H315		inhalation: ATE = 3 mg/L (vapour)	

agreed by COM					Eye Irrit. 2	H319		H319		oral: ATE = 1200 mg/kg bw	

10. Tribenuron-methyl (ISO)

Existing Annex VI entry (CLP, Table 3.1)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	607-177-00-9	tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate	401-190-1	101200-48-0	Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H317 H400 H410	GHS07 GHS09 Wng	H317 H410		M=100	
Dossier submitters proposal	607-177-00-9	tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate	401-190-1	101200-48-0	**Retain** Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1 **Add** STOT RE 2	**Retain** H317 H400 H410 **Add** H373	**Retain** GHS07 GHS09 Wng **Add** GHS08	**Retain** H317 H410 **Add** H373		**Retain** M=100 **Add** M=100	
RAC opinion	607-177-00-9	tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate	401-190-1	101200-48-0	**Retain** Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1 **Add** STOT RE 2	**Retain** H317 H400 H410 **Add** H373	**Retain** GHS07 GHS09 Wng **Add** GHS08	**Retain** H317 H410 **Add** H373		**Retain** M=100 **Add** M=100	
Resulting Annex VI entry if agreed by COM	607-177-00-9	tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate	401-190-1	101200-48-0	STOT RE 2 Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H373 H317 H400 H410	GHS08 GHS07 GHS09 Wng	H373 H317 H410		M=100 M=100	

11. Mesotrione (ISO)

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	609-064-00-X	mesotrione (ISO) 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione		104206-82-8	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410			
Dossier submitters proposal	609-064-00-X	mesotrione (ISO) 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione		104206-82-8	**Retain** Aquatic Acute 1 Aquatic Chronic 1 **Add** Repr. 2 STOT RE 2	**Retain** H400 H410 **Add** H361d H373 (kidney)	**Retain** GHS09 Wng **Add** GHS08	**Retain** H410 **Add** H361d H373 (kidney)		**Add** M=10 M=10	
RAC opinion	609-064-00-X	mesotrione (ISO) 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione		104206-82-8	**Retain** Aquatic Acute 1 Aquatic Chronic 1 **Add** Repr. 2 STOT RE 2	**Retain** H400 H410 **Add** H361d H373 (eyes, nervous system)	**Retain** GHS09 Wng **Add** GHS08	**Retain** H410 **Add** H361d H373 (eyes, nervous system)		**Add** M=10 M=10	
Resulting Annex VI entry if agreed by COM	609-064-00-X	mesotrione (ISO) 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione		104206-82-8	Repr. 2 STOT RE 2 Aquatic Acute 1 Aquatic Chronic 1	H361d H373 (eyes, nervous system) H400 H410	GHS08 GHS09 Wng	H361d H373 (eyes, nervous system) H410		 M=10 M=10	

12. Hymexazol (ISO)

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	613-115-00-1	hymexazol (ISO); 3-hydroxy-5-methylisoxazole	233-000-6	10004-44-1	Acute Tox. 4* Eye Dam. 1 Aquatic Chronic 3	H302 H318 H412	GHS05 GHS07 Dgr	H302 H318 H412			
Dossier submitters proposal	613-115-00-1	hymexazol (ISO); 3-hydroxy-5-methylisoxazole	233-000-6	10004-44-1	**Retain** Eye Dam. 1 **Add** Repr. 2 Skin Sens. 1B **Modify** Acute Tox. 4 Aquatic Chronic 2	**Retain** H302 H318 **Add** H361d H317 **Modify** H411	**Retain** GHS05 GHS07 Dgr **Add** GHS08 GHS09	**Retain** H302 H318 **Add** H361d H317 **Modify** H411			
RAC opinion	613-115-00-1	hymexazol (ISO); 3-hydroxy-5-methylisoxazole	233-000-6	10004-44-1	**Retain** Eye Dam. 1 **Add** Repr. 2 Skin Sens. 1 **Modify** Acute Tox. 4 Aquatic Chronic 2	**Retain** H302 H318 **Add** H361d H317 **Modify** H411	**Retain** GHS05 GHS07 Dgr **Add** GHS08 GHS09	**Retain** H302 H318 **Add** H361d H317 **Modify** H411		**Add** oral: ATE = 1600 mg/kg bw	
Resulting Annex VI entry if agreed by COM	613-115-00-1	hymexazol (ISO); 3-hydroxy-5-methylisoxazole	233-000-6	10004-44-1	Repr. 2 Acute Tox. 4 Eye Dam. 1 Skin Sens. 1 Aquatic Chronic 2	H361d H302 H318 H317 H411	GHS08 GHS07 GHS05 GHS09 Dgr	H361d H302 H318 H317 H411		oral: ATE = 1600 mg/kg bw	

13. Sodium N-(hydroxymethyl)glycinate; [formaldehyde released …]

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]	274-357-8	70161-44-3	Carc. 1B Muta. 2 Acute Tox. 4 Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1	H350 H341 H302 H315 H318 H317	GHS08 GHS07 Dgr	H350 H341 H315 H318 H317			8, 9
RAC opinion	TBD	sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]	274-357-8	70161-44-3	Carc. 1B Muta. 2 Acute Tox. 4 Acute Tox. 4 STOT SE 3 Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1	H350 H341 H332 H302 H335 H315 H319 H317	GHS08 GHS07 Dgr	H350 H341 H332 H302 H335 H315 H319 H317		oral: ATE = 1050 mg/kg bw inhalation: ATE = 3.0 mg/L (dusts and mists)	8, 9
Resulting Annex VI entry if agreed by COM	TBD	sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]	274-357-8	70161-44-3	Carc. 1B Muta. 2 Acute Tox. 4 Acute Tox. 4 STOT SE 3 Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1	H350 H341 H332 H302 H335 H315 H319 H317	GHS08 GHS07 Dgr	H350 H341 H332 H302 H335 H315 H319 H317		oral: ATE = 1050 mg/kg bw inhalation: ATE = 3.0 mg/L (dusts and mists)	8, 9

14. Trimethoxy(methyl)silane

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	trimethoxy(methyl)silane	214-685-0	1185-55-3	Skin Sens. 1B	H317	GHS07 Wng	H317			
RAC opinion	TBD	trimethoxy(methyl)silane	214-685-0	1185-55-3	No classification due to inconclusive data						
Resulting Annex VI entry if agreed by COM	TBD	trimethoxy(methyl)silane	214-685-0	1185-55-3	No resulting Annex VI entry						

15. Penflufen[5]

No current Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	No current Annex VI entry										
Dossier submitters proposal	TBD	5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; 2'-[(RS)-1,3-dimethylbutyl]-5-fluoro-1,3-dimethylpyrazole-4-carboxanilide; penflufen	-	494793-67-8	Carc. 2 Aquatic Acute 1 Aquatic Chronic 1	H351 H400 H410	GHS08 GHS09 Wng	H351 H410		M=1 M=1	
RAC opinion	TBD	5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; 2'-[(RS)-1,3-dimethylbutyl]-5-fluoro-1,3-dimethylpyrazole-4-carboxanilide; penflufen	-	494793-67-8	Carc. 2 Aquatic Acute 1 Aquatic Chronic 1	H351 H400 H410	GHS08 GHS09 Wng	H351 H410		M=1 M=1	
Resulting Annex VI entry if agreed by COM	TBD	5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; 2'-[(RS)-1,3-dimethylbutyl]-5-fluoro-1,3-dimethylpyrazole-4-carboxanilide; penflufen	-	494793-67-8	Carc. 2 Aquatic Acute 1 Aquatic Chronic 1	H351 H400 H410	GHS08 GHS09 Wng	H351 H410		M=1 M=1	

[5] Hazard classes agreed at RAC-46 plenary, adoption of the opinion will follow via written procedure

Table 2: CLH opinions carried over to RAC-47

1. Lead

1. Lead

Existing Annex VI entry (CLP, Table 3)

Classification and labelling in accordance with the CLP Regulation (Regulation (EC) 1272/2008)

	Index No	International Chemical Identification	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
					Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	[1] 082-013-00-1 [2] 082-014-00-7	[1] lead powder; [particle diameter < 1 mm] [2] lead massive: [particle diameter ≥ 1 mm]	[1,2] 231-100-4	[1,2] 7439-92-1	Repr. 1A Lact.	H360FD H362	GHS08 Dgr	H360FD H362		[1] Repr. 1A; H360D: C ≥ 0,03 %	
Dossier submitters proposal	[1] 082-013-00-1 [2] 082-014-00-7	[1] lead powder; [particle diameter < 1 mm] [2] lead massive: [particle diameter ≥ 1 mm]	[1,2] 231-100-4	[1,2] 7439-92-1	**Retain** Repr. 1A Lact. **Add** Aquatic Acute 1 Aquatic Chronic 1	**Retain** H360FD H362 **Add** H400 H410	**Retain** GHS08 Dgr **Add** GHS09	**Retain** H360FD H362 **Add** H410		**Retain** [1] Repr. 1A; H360D: C ≥ 0,03 % **Add** M=10 M=10	
RAC opinion	[1] 082-013-00-1 [2] 082-014-00-7	[1] lead powder; [particle diameter < 1 mm] [2] lead massive: [particle diameter ≥ 1 mm]	[1,2] 231-100-4	[1,2] 7439-92-1	**Retain** Repr. 1A Lact. **Add** Aquatic Acute 1 Aquatic Chronic 1	**Retain** H360FD H362 **Add** H400 H410	**Retain** GHS08 Dgr **Add** GHS09	**Retain** H360FD H362 **Add** H410		**Retain** [1] Repr. 1A; H360D: C ≥ 0,03 % **Add** M=1 M=1	
Resulting Annex VI entry if agreed by COM	082-013-00-1	lead powder; [particle diameter < 1 mm]	231-100-4	7439-92-1							
Resulting Annex VI entry if agreed by COM	082-014-00-7	lead massive; [particle diameter ≥ 1 mm]	231-100-4	7439-92-1							

Part III. List of Attendees of the RAC-46 meeting

RAC Members
Agapiou Agapios
Andreou Kostas
Barański Bogusław
Biró Anna
Bjørge Christine
Borg Daniel
Carvalho João
Chankova-Petrova Stephka
Czerczak Sławomir
de la Flor Tejero Ignacio
Dunauskienė Lina
Dungey Stephen
Geoffroy Laure
Gruiz Katalin
Hakkert Betty
Husa Stine
Ilie Mihaela
Kadiķis Normunds
Kapelari Sonja
Karadjova Irina
Leinonen Riitta
Losert Annemarie
Lund Bert-Ove
Martínek Michal
Menard Srpčič Anja
Moeller Ruth
Moldov Raili
Mullooly Yvonne

Murray Brendan
Neumann Michael
Paris Pietro
Polakovičová Helena
Printemps Nathalie
Pronk Marja
Rucki Marian
Santonen Tiina
Schlüter Urs
Schulte Agnes
Séba Julie
Smith Andrew
Sørensen Hammer Peter
Sogorb Miguel A.
Spetseris Nikolaos
Stahlmann Ralf
Tobiassen Lea Stine
Užomeckas Žilvinas
Varnai Veda
Apologies, Members
Aquilina Gabriele
Tsitsimpikou Christina
Zeljezic Davor

Members' advisers
Crowther Ally (Andrew Smith)_CLH citral_geranol
Groothuis Floris (Betty Hakkert)_CLH DOTL and DOTC
Kuittinen Marko (Riitta Leinonen)
Mahiout Selma (Tiina Santonen)
Müller Andre (Marja Pronk)
Peczkowska Beata (Boguslaw Baranski)
Talasniemi Petteri (Riitta Leinonen)
Commission
Luvara Giuseppina (DG ENV)
Roebben Gert (DG GROW)
Morris Alick (DG EMPL)
Regular stakeholder observers
Annys Erwin (CEFIC)
Barry Frank (ETUC)
Bernard Alice (ClientEarth)
Romano Mozo Dolores (EEB)
Rowe Rocky (ECPA)
Waeterschoot Hugo (Eurometaux)
Apologies, stakeholders
Comini Andrea (EuCheMS)
Occasional stakeholder observers
Reid Kirsty (EPFIA)_Art 77(3) PFOA

Dossier submitters
De Blaeij Arianne (NL)_restriction PAHs
Clausen Ian Henning (DK)_CLH lead
Munch Pernille (DK)_CLH lead
Talasniemi Petteri (FI)_CLH hymexazol
Verhoeven Julia (NL)_restriction PAHs
Stakeholder experts
Bogers Rinus (Cefic/Ashland Inc)_Sodium N (hydroxymethyl glycianate)
Brinkmann Joseph (Cefic/Evonik Resource Efficiency GmbH)_Trimethoxy(methyl)silane
Chowdhury Jasim (Eurometaux/International Lead Association)_Lead metal
Hahn Stefan (ECPA/Boda Chemie/Fraunhofer)_MES
Hareng Lars (Cefic/BASF SE)_citral
Ignarski Alessa (ECPA/Bayer CropScience)_flupyradifurone
Jamieson Matthew (EFPIA/Astrazeneca)_Art 77(33) PFOA
Kelsey Jeff (Cefic/Independent contractor at ChemSageLtd)_2-butoxyethanol
Lemke Olga (Cefic/BASF SE)_geraniol
Lloyd Sara (ECPA/Syngenta)_mesotrione
Mackie Carol (Eurometaux/Copper Compounds Consortium and Arch Timber Protection)_Zn pyrithion
Moxon Mary (ECPA/Mitsui)_hymexazol
Shipp Elizabeth (ECPA/Bayer CropScience)_penflufen
Warren Simon (FMC)_tribenuron-methyl
Yada Makiko (Cefic/Daikin Chemical Europe GmbH)_Art 77(3) PFOA

REMOTE PARTICIPANTS
RAC Members
Van der Haar Rudolf (co-opted member)
Members' advisers
Catone Tiziana (Gabriele Aquilina)
Esposito Dania (Pietro Paris)
Hölzl Christine (Annemarie Losert)
Martin Theresa (Ralf Stahlmann)
Peppin Lindsay (Andrew Smith)
Russo Maria Teresa (Gabriele Aquilina)
SEAC rapporteurs
Kiiski Johanna
Dossier submitters
AT
Altmann Dominik (Sodium N)
Hauzenberger Ingrid (Sodium-N)
Paparella Martin (Sodium N)
DE
Averbeck Frauke (C9-C14-PFCAs)
Hoffmann Frauke (1-butoxyethanol)
Staude Claudia (C9-C14 PFCAs)
DK
Andersen Trine Thorup (geraniol_citral)
Winther Toke (geraniol, citral)

PL
Jusko Kararzyna (MES)
NL
Ter Burg Wouter (PAHs)
Geraets Lisbeth (PAHs)
No
Blom Cécile (tattoo inks)
Gutzkow Kristine (tattoo inks)
Haug Eva (tattoo inks)
Hofer Tim (tattoo inks)
Van der Hagen Marianne (tattoo inks)
Øystein Fotland Tor (tattoo inks)
SE
Henriksson Witasp Erika (DOTL and DOTC)
Stewart Alexandra (trimethoxy(methyl)silane
UK
Peppin Lindsay (mesotriane)
Commission
Blass Rico Ana Maria
Gutierrez Miriam

ECHA staff
Blainey Mark
Bowmer Tim, Chairman
Broeckaert Fabrice
Dvorakova Dana
Georgiadis Nikolaos
Gmeinder Michael
Hellsten Kati
Hollins Steve
Jaagus Triin
Jones Stella
Karjalainen Ari
Kivelä Kalle
Kokkola Leila
Kouloumpos Vasileios
Lapenna Silvia
Liopa Elīna
Ludborzs Arnis
Luschutzky Evita
Nicot Thierry
Nygren Jonas
Orispää Katja
O´Rourke Regina
Mazzolini Anna
Mushtaq Fesil
Peltola Jukka
Perazzolo Chiara
Pillet Monique
Prevedouros Konstantinos
Sadam Diana

Simoes Ricardo
Smilovici Simona
Sosnowski Piotr
Spjuth Linda
Stoyanova Evgenia
Uphill Simon
Van Haelst Anniek
Evening session on Life Sciences round table – delegation
*P**harmaceuticals (including vaccines and animal health)***
Loughran Louise (Eli Lilly)
Navarro Carine (Sanofi Pasteur)
Tanghe Tom (Johnson & Johnson)
Blood plasma products
Misztela Dominika (PPTA)
Rossi Francoise (IPFA)
Soubiale Sébastien (LBF)
In vitro diagnostic (IVD) medical devices
Hartmann Rola Azzi (Roche Diagnostics)
Buijs Nathalie (MedTech Europe)

Part IV. LIST OF ANNEXES

ANNEX I Final Agenda of the RAC-46 meeting

ANNEX II List of documents submitted to the Members of the Committee for Risk Assessment for the RAC-46 meeting

ANNEX III Declarations of conflicts of interest to the Agenda of the RAC-46 meeting

ANNEX IV Administrative issues and information items

ANNEX V Short summary from the workshop on the methodology on scientific evaluation of proposals for Occupational Exposure Limits

10 September 2018
RAC/A/46/2018

Final Agenda
46th meeting of the Committee for Risk Assessment

10 – 14 September 2018

ECHA Conference Centre (Annankatu 18, Helsinki)

Monday 10 September starts at 09.00
Friday 14 September ends at 13.30

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC/A/46/2018
For adoption

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Appointment of (co-)rapporteurs

a) Appointment of (co-)rapporteurs for CLH dossiers, restriction dossiers, authorisation applications, DNEL/dose-response relationships, Article 95(3) requests and Article 77(3)(c) requests

For agreement

Item 5 – Report from other ECHA bodies and activities

a) Report on RAC 45 action points, written procedures and update on other ECHA bodies

RAC/46/2018/01
(room document)
For information

b) RAC workplan for all processes

For information

c) Annual update of RAC accredited stakeholders' list

RAC/46/2018/02
(restricted)
For agreement

d) General RAC-procedures

RAC/46/2018/03

Item 6 – Requests under Article 77(3)(c)

2) Request to review a derogation request for the PFOA restriction (entry 68 of Annex XVII to REACH)

For adoption

Item 7 – Requests under Article 95 (3)

None

Item 8 – Harmonised classification and labelling (CLH)

8.1 General CLH issues

8.2 CLH dossiers

A. Hazard classes for agreement without plenary debate (fast-track)

flupyradifurone: physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, STOT SE, germ cell mutagenicity, carcinogenicity, environmental hazards

tribenuron-methyl (ISO): physical hazards (flammable solids, pyrophoric solids, emission of flammable gases), acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT SE, germ cell mutagenicity, toxicity to reproduction, environmental hazards

dichlorodioctylstannane: acute toxicity (inhalation route of exposure)

sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]: acute toxicity (dermal route of exposure), STOT RE, toxicity to reproduction, environmental hazards

hymexazol (ISO): acute toxicity (oral route of exposure), skin sensitisation, environmental hazards

5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen: physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, STOT SE, germ cell mutagenicity, environmental hazards

2-butoxyethanol; ethylene glycol monobutyl ether: skin corrosion / irritation

mesotrione (ISO): germ cell mutagenicity, carcinogenicity, environmental hazards

B. Hazard classes for agreement with plenary debate

1) tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate
2) dichlorodioctylstannane
3) lead
4) trimethoxy(methyl)silane
5) sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]
6) 4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone
7) hymexazol (ISO); 3-hydroxy-5-methylisoxazole
8) 5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen

9) 2-butoxyethanol; ethylene glycol monobutyl ether
10) geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol
11) dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]
12) citral
13) mesotrione (ISO); 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione
14) mecetronium etilsulfate; N-ethyl-N,N-dimethylhexadecan-1-aminium ethyl sulfate; [MES] – *ENV only*
15) pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc –
16) butanone oxime; ethyl methyl ketoxime; ethyl methyl ketone oxime

For discussion and adoption

Item 9 – Restrictions

9.1 Restriction Annex XV dossiers

a) Conformity check and key issues discussion
   1) Plastic and rubber granulates containing PAHs

For agreement

b) Opinion development
   1) Substances used in tattoo inks and permanent make-up – final draft opinion
   2) C9-C14 PFCAs, their salts and related substances– final draft opinion

For discussion/adoption

Item 10 – Authorisation

10.1 General authorisation issues

a) Update on incoming/future applications

For information

b) Committee Procedure for fast track agreement of opinions on applications for authorisation

RAC/46/2018/04
For discussion and agreement

10.2. Authorisation applications

a) Discussion on key issues
   1. CT_Mahle (1 use)
   2. CT_Doosan (1 use)

For discussion

b) Adoption of final opinions

   1. DtC_Wesco (1 use)

2. SC_Wesco (1 use)
3. PCO_Aviall (2 uses)
4. CT_Hapoc (2 uses)

For discussion and adoption

Item 11 – AOB

Item 12 – Action points and main conclusions of RAC-46

Table with Conclusions and Action points from RAC-46

For adoption

Annex II (RAC 46)

Documents submitted to the Members of the Committee for Risk Assessment for the RAC 46 meeting.

Document number	Title
RAC/A/46/2018	Final Draft Agenda
RAC/A/46/2018 Restricted	Draft outline agenda
RAC/46/2018/01 Room document	Report on RAC-45 action points, written procedure and update on other ECHA bodies
RAC/46/2018/02 Restricted	Annual update of RAC accredited stakeholder list
RAC/46/2018/03 Restricted room document	General RAC procedures
RAC/45/2018/04	Committee Procedure for fast track agreement opinions on application for authorisation

ANNEX III (RAC-46)

The following participants, including those for whom the Chairman declared the interest on their behalf, declared potential conflicts of interest with the Agenda items (according to Art 9 (2) of RAC RoPs)

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
ALREADY DECLARED AT PREVIOUS RAC PLENARY MEETING(S)		
Applications for Authorisation		
All chromates	Urs SCHLÜTER	Institutional & personal involvement; asked to refrain from voting in the event of a vote on this group of substances - other mitigation measures may be applied by the Chairman.
Harmonised classification & labelling		
pyrithione zinc **SE**	Bert-Ove LUND	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Daniel BORG	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
pyrithione zinc **SE**	Tim BOWMER (RAC Chairman)	The Chairman declared an interest, noting that prior to joining ECHA in 2012, he had worked for many years in support of the Biocidal Products registration of a related pyrithione salt. He declared that he had not dealt with the opinion development of this dossier with the exception of agenda management and would therefore not chair this agenda point.
mecetronium ethyl sulphate [MES] **PL**	Boguslaw BARANSKI	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
Butanone oxime	Agnes SCHULTE	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
DE		measures applied. Personal involvement.
	Urs SCHLÜTER	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
Requests under Article 77(3) (c)		
Restrictions		
Tattoo inks	Peter Hammer SOERENSEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
Tattoo inks	Lea Stine TOBIASSEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
Tattoo inks	Agnes SCHULTE	Working for the CA which has been involved in the preparation of the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
Tattoo inks	Urs SCHLÜTER	Working for the CA which has been involved in the preparation the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
Tattoo inks	Stine HUSA	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
Tattoo inks	Christine BJORGE	Working for the CA submitting the dossier; asked to refrain from voting

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
		in the event of a vote on this substance - no other mitigation measures applied.
PFCAs	Bert-Ove LUND	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
	Daniel BORG	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement.
PFCAs	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
PFCAs	Urs SCHLÜTER	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
PFCAs	Agnes SCHULTE	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.

New dossiers

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
NEW		
Article 77.3(c)		
-	-	-
Restrictions		
Rubber granulates (eight polycyclic aromatic hydrocarbons (PAHs[6]) contained in plastic, rubber and other granules for use as infill material on synthetic turf pitches and for use as loose granules or mulch on playgrounds and sport applications)	Marja PRONK	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement.
	Betty HAKKERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
Applications for Authorisation		
-	-	-
Harmonised classification & labelling		
1) 2-butoxyethanol; ethylene glycol monobutyl ether **DE**	Agnes SCHULTE	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Urs SCHLÜTER	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
1) mesotrione (ISO); 2-[4-(methylsulfonyl)-2-	Andrew SMITH	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation

[6] Benzo[a]pyrene (BaP), Benzo[e]pyrene (BeP), Benzo[a]anthracene (BaA), Chrysene (CHR), Benzo[b]fluoranthene (BbFA), Benzo[j]fluoranthene (BjFA),Benzo[k]fluoranthene (BkFA), Dibenzo[a,h]anthracene (DBAhA)

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
nitrobenzoyl]-1,3-cyclohexanedione **2) 5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen** **UK**		measures applied. Personal involvement in 1) and 2).
	Steve DUNGEY	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
1) geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol **2) citral** **3) lead** **DK**	Peter Hammer SOERENSEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Lea Stine TOBIASSEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate] **AT**	Sonja KAPELARI	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Annemarie LOSERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
1) tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate **2) dichlorodioctylstannane** **3) trimethoxy(methyl)silane** **4) dioctyltin dilaurate; [1] stannane, dioctyl-,**	Bert-Ove LUND	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Daniel BORG	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
bis(coco acyloxy) derivs. [2] **SE**		
hymexazol (ISO); 3-hydroxy-5-methylisoxazole **FI**	Riitta LEINONEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement.
	Tiina SANTONEN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied.
	Selma MAHIOUT (advisor to Tiina SANTONEN)	Working for the CA submitting the dossier; involved in the preparation of the classification proposal by the Finnish CA in its early stages.
4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone **NL**	Betty HAKKERT	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.
	Marja PRONK	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement.

Annex IV (RAC 46)

Helsinki, 7 September 2018

RAC/46/2018/01

ROOM DOCUMENT

46TH MEETING OF THE COMMITTEE FOR RISK ASSESSMENT

10 – 14 September 2018

Helsinki, Finland

Concerns: **Administrative issues and information items**

Agenda Point: **5a**

Action requested: **for information**

ADMINISTRATIVE ISSUES AND INFORMATION ITEMS

1 Status report on the RAC-45 Action Points

The RAC-45 action points due for RAC-46 are completed.

2 Outcome of written procedures & other consultations

2.1 Written procedures for adoption of RAC opinions / minutes of the meeting

Opinions / minutes adopted via written procedure	Deadline	Report on the outcome
Written procedure for adoption of the minutes of RAC-45	15 August 2018	closed

2.2 RAC consultations (status by 31 August 2018)

Subject / document	Deadline	Status / follow-up
Harmonised classification and labelling		
tribenuron-methyl (ISO); methyl 2-[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-N-methylcarbamoylsulfamoyl]benzoate	16 August 2018	closed
dichlorodioctylstannane	15 August 2018	closed
dioctyltin dilaurate; [1] stannane, dioctyl-, bis(coco acyloxy) derivs. [2]	15 August 2018	closed
trimethoxy(methyl)silane	8 August 2018	closed
sodium N-(hydroxymethyl)glycinate; [formaldehyde released from sodium N-(hydroxymethyl)glycinate]	21 August 2018	closed
4-{[(6-chloropyridin-3-yl)methyl](2,2-difluoroethyl)amino}furan-2(5H)-one; flupyradifurone	7 August 2018	closed
hymexazol (ISO); 3-hydroxy-5-methylisoxazole	10 August 2018	closed
5-fluoro-1,3-dimethyl-N-[2-(4-methylpentan-2-yl)phenyl]-1H-pyrazole-4-carboxamide; penflufen	13 August 2018	closed
2-butoxyethanol; ethylene glycol monobutyl ether	15 August 2018	closed
geraniol; (2E)-3,7-dimethylocta-2,6-dien-1-ol	8 August 2018	closed
citral	8 August 2018	closed
lead	16 August 2018	closed

Subject / document	Deadline	Status / follow-up
mesotrione (ISO); 2-[4-(methylsulfonyl)-2-nitrobenzoyl]-1,3-cyclohexanedione	1 August 2018	closed
mecetronium etilsulfate; N-ethyl-N,N-dimethylhexadecan-1-aminium ethyl sulfate; [MES] – *ENV only*	15 August 2018	closed
pyrithione zinc; (T-4)-bis[1-(hydroxy-.kappa.O)pyridine-2(1H)-thionato-.kappa.S]zinc – *final adoption of the opinion*	tbc	
Butanone oxime - *(STOT RE only; after targeted PC)*	27 July 2018	closed
Application for Authorisation / Review Report		
CT_Doosan, CT_MAHLE Consultation on applications for authorisation	26 September 2018	open
PCO_Aviall Consultation on draft final opinions	17 August 2018	closed
CT_Hapoc Consultation on draft final opinions	21 August 2018	closed
DtC_Wesco Consultation on draft final opinion	21 August 2018	closed
SC_Wesco Consultation on draft final opinion	21 August 2018	closed
Consultation on the draft fast-track procedure for applications for authorisation	28 August 2018	closed
Restrictions		
Consultation on third draft opinion on PFCAs	24 August 2018	closed
Consultation on third draft opinion on tattoo inks	27 August 2018	closed
Consultation on the conformity of Annex XV dossier on rubber granulates	28 August 2018	closed
Art. 77. 3. c request on PFOA		
Consultation on draft opinion on the Article 77(3) (c) request for reviewing a derogation request for the restriction on PFOA	6 August	closed
Art. 77. 3. c request on evaluations OELs		
no consultations		

2.3 Other written consultations of RAC (status by 29 May 2018)

Subject / document	Deadline	Status / follow-up
Consultation the draft minutes of RAC-45	30 July 2018	closed

2.4 Calls for expression of interest

Calls for expression of interest	Date	Outcome
Harmonised classification and labelling		
Call for expression of interest in rapporteurship for CLH dossiers / new intentions	2 – 18 July 2018	8 volunteers expressed their interest
Application for Authorisation		
Call for expression of interest in rapporteurship on applications for authorisation on SVHCs in 12 new entries in Annex XIV of the REACH Regulation. Full list of the new entries is published in Annex of the Commission Regulation (EU) 2017/999[7].		
Restriction Call for expression of interest in rapporteurship for the restriction dossiers to be submitted in January 2019	Until 26 October 2018	ongoing

2.5 Written procedures for the appointment of (co-)rapporteurs

Appointment of (Co-)rapporteur(s)	Substance	Deadline	Outcome
Harmonised classification and labelling			
Written procedure for the appointment of (co-)rapporteurs	▪ isoxaflutole (ISO) ▪ quinoclamine ▪ clothianidin (ISO) ▪ thiamethoxam (ISO) ▪ methyl salicylate ▪ propamocarb hydrochloride ▪ diflufenican (ISO) ▪ flutolanil (ISO) ▪ diethyl oxalate ▪ bisphenol A ▪ transfluthrin (ISO)	26 July 2018	closed No comments were received from RAC members on the recommendation of the Chairman; the RAC (co-)Rapporteurs were appointed with tacit agreement.
Applications for Authorisation– no written procedures			
Restrictions – no written procedures			

[7] Commission Regulation (EU) 2017/999 of 13 June 2017 amending Annex XIV to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

2.6 Follow-up on the opinions on applications for authorisation adopted by RAC and SEAC

Opinion(s)	Sent on
Opinions sent to the European Commission, the Member States and applicants	
DBP_AVX (1 opinion)	19 July 2018
SD_Olwerke (1 opinion)	3 August 2018

Short summary

Workshop on the methodology on scientific evaluation of proposals for Occupational Exposure Limits

11 September 2018
ECHA (Annankatu 18, Helsinki)
Evening session

A preparatory workshop on the methodology on scientific evaluation of proposals for Occupational Exposure Limits was held during an evening session during RAC-46.

The ECHA Secretariat introduced this as a follow-up of Action 12(3) in the Staff Working Document of the REACH Review (March 2018) '*Align methodologies to establish safe levels of exposure to chemicals at the workplace by first quarter 2019*'. The meeting was informed that the Agency intends to update the ECHA guidance R8 with an appendix via the standard ECHA Guidance procedure.
This Guidance is mainly aimed at ECHA (dossier submitter) for drafting proposals on OEL setting, at RAC members for drafting opinions and at stakeholders who wish to contribute to the process and the dossiers.

Development of the ECHA Guidance appendix will follow the standard ECHA Guidance consultation procedure, including a consultation round with a Partner Expert Group (PEG), RAC-members and MS-CAs. Via this consultation round the draft text will be consulted broadly with OSH and other stakeholders. Given the Commission's timeline, the PEG is foreseen to take place in January 2019, and the RAC consultation is foreseen to take place in March 2019.

The intention of the preparatory workshop is to have an open discussion on how RAC will scientifically evaluate OEL proposals and to develop methodology on how to prepare a proposal. The items of the discussion will be used in the drafting of the text for the Appendix.

The discussion focussed on the main conclusions of the Joint ECHA/RAC-SCOEL Task Force (JTF), as described in the two reports published in 2017. It was acknowledged that the agreed conclusions of the JTF are to be incorporated in the draft text of the Appendix.

The participants generally supported the importance for further guidance on biomonitoring,

However, it was understood that due to the short time frame, developing new methodology, e.g. on biomonitoring would not be feasible and therefore it was supported that, besides the

incorporation of the results of the JTF-reports, the relevant parts of the revised SCOEL methodology and the ECHA R8 guidance itself would generally be cross-referenced. It was also pointed out that developing OEL's was a long term proposition for RAC and that further Guidance could be developed in the future.

Examples of topics that members found important to be considered (and generally covered by the aforementioned documents) were:

- Brief guidance on all the other regular SCOEL limit values (STEL, BLV, BGV and 'notations');
- Observations in the workplace: sensory irritation and smell as early warning signs;
- What are the circumstances when it is more appropriate not to set or recommend an OEL or other reference value/notation?
- Weight of evidence approaches, including both animal and human data;
- Quality and interpretation of epidemiology data.

Some participants expressed their concerns that the scientific discussion on the agreed items within the JTF could be re-opened during the ECHA Guidance consultation procedure, in particular during the consultation round with experts. It was recommended to clearly indicate within the ECHA Guidance consultation rounds that it is not the intention to re-open the discussion on the items already agreed within the Joint task Force and that the appended Guidance will be based on and limited to relevant existing guidance. Furthermore, in order to nominate the appropriate experts in the Occupational Safety and Health working area, a specific note referring to the OSH expertise will be added to the PEG invitations.