RAC/M/47/2018

FINAL

27 February 2019

Amended 17 April 2019 (agenda point 8.2B 11)

Minutes of the 47th Meeting of the Committee for Risk Assessment (RAC 47)

Tuesday 20 November starts at 14.00
Friday 23 November suspended at 13.00
Tuesday 27 November resumed at 9.00
Friday 30 November ends at 13.00

Part I Summary Record of the Proceedings

1. Welcome and apologies

The Chairman, Tim Bowmer, welcomed all the participants to the 47th meeting of the Committee for Risk Assessment (RAC 47). Apologies were received from five Members.

He noted that the Secretariat intended to explore the use of working groups (both ad hoc and for the first time mandated for longer periods) in 2019 in order to prepare opinions and to take pressure off the plenary meetings. A paper on setting up RAC working groups in general and a draft mandate aimed at a working group for the process of applications for authorisation (AfA) would be tabled at this meeting for consideration. This also ties in to the proposal previously presented at RAC 46 on A-listing some dossiers which is for agreement at this meeting.

Referring to the updated workplan of RAC, the Chairman noted that a total of eight restriction proposals were expected in the first half of 2019, an unprecedented increase in the number of dossiers, the majority prepared by ECHA at the request of the Commission. In this context, he reported that the agency had concerns as to how the conformity of restriction proposals was currently interpreted by the Committee and that he would discuss a simpler approach during this meeting, tying in to REACH review action point 10[1].

The Chairman then noted the predominance of Classification, Labelling and Packaging dossiers tabled at this meeting (23), stating that this would help to reduce a backlog of dossiers, especially those approaching the legal deadline.

The Chairman then wished the participants a fruitful and productive meeting.

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 46th 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/47/2018).

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.

The following points were added to the agenda:

- The Secretariat will give a presentation on the FORUM on Enforcement - REF-4 Project on restrictions.
- The Secretariat will report back from the rapporteurs' preparatory workshop held on the morning of 20 November (see Annex V).
- The secretariat will introduce a proposed addendum to the RAC note on coal tar pitch (high temp.) (CTPHT) to adjust the advice on dermal risk assessment

The Committee then adopted the agenda.

[1] COM(2018)116

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.

The Chairman further requested all participants to declare any potential conflicts of interest to any of the agenda items. 15 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, applications for authorisation, DNEL/dose-response relationships, Article 95 (3) requests and Article 77 (3) (c) requests (closed session).

The Secretariat collected the names of volunteers for rapporteurships for CLH dossiers and applications for authorisation, as stated in the restricted room document. The Committee agreed upon the proposed appointments of the Rapporteurs for the intentions and/or newly submitted CLH, as well as the forthcoming applications for authorisation.

The Committee agreed with the names of volunteers for the Rapporteurs for the six restriction proposals, to be submitted in January 2019.

5. Report from other ECHA bodies and activities

a) Report on RAC-46 action points, written procedures and an update on other ECHA bodies

The Chairman informed the Committee that most of the action points from the previous meeting RAC-46, pending publications of three CLH opinions, 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/47/2018/01) (see Annex IV).

b) RAC workplan for all processes

The Chairman informed the meeting participants about the updated RAC work plan 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 proposals and applications for authorisation 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) General RAC procedures

Working groups of RAC

The Secretariat introduced its "*proposal for clarifying and strengthening the role of the Committee's rapporteurs in relation to the Working Group and its operation*", intended as an addition to the requirements for setting up working groups of RAC (and SEAC) as already contained in Art 85 of REACH and the rules of procedure of both Committees.

RAC discussed in general terms what might be needed in the set-up and running of working groups and agreed with the general principles outlined in the document (RAC/47/2018/02).

The Secretariat introduced the document "*A proposal for a mandate for a Working Group of RAC on Applications for Authorisation*" (RAC/47/2018/03), noting that in its view, the process of applications for authorisation was the most suitable for gaining efficiencies through the addition of a working group. Some members questioned this but the Committee generally agreed that processes such as CLP and Restriction with strong Member State interest were best dealt with in plenary rather than in thematic or process-based working groups.

It was emphasised by the Secretariat that the terms of reference of a working group as defined in Art. 85 of the REACH regulation and the RAC (and SEAC) rules of procedure, would automatically apply all of the principles of membership, independence, transparency and interest management that are applied to RAC itself.

The role of a 'preliminary evaluation report' was questioned and members favoured drafting in the opinion template. It was pointed out that the division of work between the working group and the plenary meetings of RAC needed further consideration to ensure that there would be real time savings in plenary. Members warned against setting up a parallel administrative process but to rely on what had already been built up for authorisations, including the new opinion template.

It was recognised that to set up a working group with the intention of pre-processing all applications for authorisation prior to plenary, additional resources would be required. It was recognised that RAC members and the co-opted members would participate but that additional experts would be needed, as allowed under the RoP of RAC[2]. The Committee encouraged ECHA to inform the Management Board at the earliest opportunity; the Secretariat noted that the 'state of the Committees' would be reported to the Board in March 2019 in any case and such an appeal for additional resources could be included.

Members were generally in favour of a working group which would discuss the consistency of opinions drafted by the Rapporteurs and support them in their current work. However, the Secretariat felt that this would not address the workload issues in authorisation with the greater than expected workload in OP/NPEO dossiers.

Members considered that it would be appropriate to initiate such a working group on a time limited basis, i.e. as a pilot project.

The Chairman concluded that the Secretariat would revise the proposal for a draft mandate for an Authorisation WG, taking into account the discussions at RAC-47. A written commenting round on the revised draft mandate will be arranged prior to RAC-48. At RAC-48 the revised proposal will be scheduled for discussion and agreement.

[2] Note from the Secretariat: this could be in the form primarily of member's advisers or invited experts.

d) INTERACT Project

The Secretariat informed RAC on the progress with version 1 of the ECHA Interact Project, which is scheduled for release in April 2019. The scope covers two aspects: the Interact Portal which is foreseen as a single point of entry for all interactions with ECHA (with single sign in) and the first Interact component – a collaboration tool, facilitating the drafting of co-authored documents. The members expressed the needs to be able to work offline, to be able to see track changes and to check out documents, i.e. without co-authoring. Members were also interested to have access to relevant registration dossiers and direct access to scientific papers or a reference library with at least abstracts available.

e) RAC Stakeholder Satisfaction Survey 2018

The Secretariat presented a summary of the results of the RAC Stakeholder Satisfaction Survey 2018.

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

6.1 Copper compounds (M-factor)

The Chairman welcomed the expert accompanying the Eurometaux stakeholder observer and reported that based on a request from the Commission to ECHA a mandate to RAC to develop and adopt an opinion on the M-factors for long-term aquatic hazard for ten copper substances listed in Commission Regulation (EU) 2016/1179 has been given by the Executive Director of ECHA. He further underlined that the scope of the mandate is limited to the addition of the chronic M-factors to the already existing Annex VI entries for the 10 copper compounds in question. The basis for the derivation of the chronic M-factors is the updated chronic ecotoxicity reference values (ERV) as included in the copper, granulated RAC opinion adopted in June 2018. In case the updated acute and chronic ERVs would have an impact on other parts of the entries than the chronic M-factors (e.g. acute classification and/or acute M-factors), the formal procedure as set out in the CLP Regulation has to be followed by submitting a CLH proposal for revision of an existing Annex VI entry.

The industry expert accompanying Eurometaux welcomed the assessment but noted that 2 sets of ERVs were derived and reported in the granulated copper RAC opinion, i.e. derivation of the ERV values with or without normalisation for the dissolved organic carbon (DOC) concentration. Therefore, it was the expectation of the expert that the RAC opinion would examine whether the choice for either or not normalising for DOC will affect the M-factors of the copper substances, to align with the granulated copper opinion".

RAC supported the calculations for the chronic M-factors for nine copper substances considered readily water soluble, thus the chronic M-factor for each substance is calculated from the lowest ERV for the dissolved metal (0.004 mg/L).

As regards copper flakes (coated with aliphatic acid), in line with the adopted opinion on the substance, transformation/dissolution protocol (T/Dp) data need to be taken into account when deriving the ERV. Depending upon the choice of loading rate (1 mg/L vs. 0.1 mg/L), the resulting chronic M-factor would differ by a factor of 10. As the CLP guidance is not conclusive on this aspect, the issue will be subject to a specific question during the short targeted public consultation planned for the draft opinion in accordance with the mandate.

The revised final opinion will be discussed and adopted at the next RAC plenary meeting.

The Chairman thanked the Rapporteur for the quick preparation of the case and presentation of the arguments and the Committee Members for their comments.

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[3] (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. potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that K-HDO is an active substance in biocidal products used as wood preservative; a fungicide with a broad spectrum of action against wood-destroying Basidiomycetes. It has no existing entry in Annex VI to the CLP Regulation.

The legal deadline for the adoption of an opinion is 28 February 2019.

K-HDO and Cu-HDO (See agenda point 8.2.B.2 below) are related substances and although evaluated separately by RAC, there are common aspects which need to be considered. Based on the fact that HDO^- anions are structurally identical, the differences in toxicological profiles are mainly related to the effects of the Cu^{2+} and K^+ ions. In addition, both compounds show similar distribution and excretion rates. Acknowledging the limited toxicological data with K-HDO for repeated dose toxicity, carcinogenicity and toxicity to reproduction and the reservations of some members, the Committee accepted the approach of the Dossier Submitter to read-across as appropriate from Cu-HDO to K-HDO.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: Flam. Sol. 1; H228, no classification for other physical hazards, Acute Tox. 3; H301, ATE (oral) = 136 mg/kg bw, no classifications for acute dermal and inhalation toxicity, Eye Dam. 1; H318, no classifications for skin sensitisation, STOT SE and germ cell mutagenicity and classification for environmental hazard as Aquatic Chronic 2; H411.

RAC discussed the skin irritation potential of the substance on basis of a pre-GLP study in the rabbit. Although some deviations from the test guideline resulting in more severe test conditions (which could compensate the fact that the substance was applied at a concentration of 50% only) and uncertainties with re-calculation of the scoring were noted by several RAC Members, the Committee concurred with the DS that the observed effects (erythema and eschar formation

[3] 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.

which was not fully reversible after 8 hours) fulfil the criteria for classification into category 2 for skin irritation.

RAC discussed repeated dose toxicity and agreed that classification into category 2 was warranted on the basis of effects seen in studies with rats where severe degenerative effects in the liver and also the stomach were reported showing that the liver was the target organ. In addition effects on liver were also observed in a 28 day inhalation study. In a weight of evidence, RAC considered the data on Cu-HDO in dogs which was considered as the most sensitive species as supporting evidence and classified K-HDO as STOT RE 2 with the liver as the target organ.

In the absence of data on the carcinogenic potential of K-HDO and taking into account also that Cu-HDO does not warrant classification for carcinogenicity, RAC concurred with the DS on no classification for this hazard.

In the absence of toxicity to reproduction studies with K-HDO and recognising that Cu-HDO does not have reprotoxic potential, RAC agreed on no classification for this hazard.

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

2. bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and reported that Cu-HDO is an active substance in biocidal products used in wood preservatives, film preservatives, fibre, leather, rubber and polymerised materials preservatives and in masonry preservatives. It has no existing entry in Annex VI to the CLP Regulation.

The legal deadline for the adoption of an opinion is 24 April 2019.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: Flam. Sol. 1; H228, no classification for other physical hazards, Acute Tox. 4; H302, ATE (oral) = 360 mg/kg bw, no classifications for acute dermal and inhalation toxicity, Eye Dam. 1; H318, no classifications for skin sensitisation, STOT SE and germ cell mutagenicity.

In line with the DS proposal, RAC agreed on no classification for skin irritation based on a negative study in the rabbit.

The Committee concurred with the DS on the proposal to classify Cu-HDO for repeated dose toxicity category 2 based on severe adverse effects seen in a 90-day oral study in dogs (chronic hepatitis, liver cirrhosis and necrosis) and supported by adverse effects (although outside guidance value) in the rat studies. Contrary to the DS, RAC considered only the liver as the target organ (adverse effects within guidance value for category 2), whereas the effects in the gastrointestinal tract and the kidney were below the guidance values for classification for repeated dose toxicity.

Carcinogenicity was assessed in a one 2-year oral carcinogenicity study in rats. RAC concurred with the DS conclusions that no classification was warranted for carcinogenicity as the number of animals with tumours and the total number of tumours were comparable between the control group and the high dose group and were within the range of the historical control data. In addition, the observations were comparable to those in the group exposed to $CuSO_4$ (corresponding to the same amount of Cu^{2+} ion at the highest dose tested with Cu-HDO).

RAC acknowledged the absence of a 1- or 2-generation reproductive toxicity study and thus a limited possibility to assess potential effects on fertility and sexual function. Based on no findings in the male or female reproductive organs in the repeated dose toxicity studies, the Committee

concluded that no classification for fertility or sexual function was warranted. Developmental toxicity of Cu-HDO was assessed in two GLP-compliant studies in the rat and the rabbit. In the discussion one RAC member pointed out that the doses used may not have been high enough in the rat study and may have resulted in no effects. However, the effects observed in the rabbit study (resorptions, reduced food consumption and increase in external malformations but without clear dose-response) were of some concern but not seen as sufficient for classification.

RAC agreed to the DS proposal to classify Cu-HDO for acute and chronic hazards to the aquatic environment (Aquatic Acute 1 and Aquatic Chronic 1) using the surrogate approach to cover the fish chronic study data gap, with an M factor of 1 for both hazard classes.

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. thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that thiencarbazone-methyl is used as a pesticidal active substance (herbicide) within the EU. The substance has no existing entry in Annex VI of the CLP Regulation thus in accordance with Article 36(2) of CLP the substance was subject to harmonised classification and labelling. All physical, human health and environment hazard classes with the exception of respiratory sensitisation, aspiration hazard and hazardous to the ozone layer were assessed in the CLH dossier. The legal deadline for the adoption of an opinion was 9 March 2019.

The DS (UK) proposed classification as Aquatic Acute 1; H400 (M=1 000) and Aquatic Chronic 1; H410 (M=1 000).

RAC agreed the following via the fast-track procedure (i.e. with scrutiny but without plenary debate): no classification for acute toxicity (oral, inhalation and dermal routes of exposure), STOT SE, skin corrosion / irritation, serious eye damage / irritation, STOT RE, germ cell mutagenicity, reproductive toxicity, and classifications for environmental hazard as Aquatic Acute 1; H400 (M = 1 000) and Aquatic Chronic 1; H410 (M = 1 000).

RAC discussed physical hazards and agreed on no classification for physical hazards. As regards skin sensitisation, the reliability of the only available study on skin sensitisation was discussed, i.e. the Guinea Pig Maximisation Test (GPMT) test. There was no information in the CLH report or in the DAR on whether the concentration used for topical induction of sensitisation was sufficiently high in this test to induce mild-to-moderate skin irritation or whether the pre-treatment of the test area with sodium lauryl sulphate had been done before topical induction in accordance with the OECD TG 406. The industry representative commented that 50% dilution of the test substance, i.e. the concentration that had been used for topical induction and challenge, was the highest achievable concentration, but he did not have the information on whether the pre-treatment of the test area with sodium lauryl sulphate had been performed. RAC concluded that there was no indication of skin sensitisation up to 50% topical induction dose and that therefore the substance did not fulfil the criteria for classification as skin sensitiser, but noted that the information regarding the conformity to the test guideline was deficient in the CLH report and DAR.

With regard to carcinogenicity the DS had proposed not to classify the substance, and the DS's proposal was supported by the rapporteurs and commenting RAC members during the RAC consultation. There were two carcinogenicity studies available; one in mice and one in rats. During the plenary discussion RAC agreed that there was not sufficient evidence of

thiencarbazone-methyl-induced carcinogenicity in the acceptable rat study. As regards the increased incidences of transitional cell epithelium tumours in the urinary bladder in mice, it was pointed out that IARC considered urinary bladder carcinogenesis not to be species-specific. One member commented that the case was a borderline between no classification and Carc. 2. However, other members were of the view that such tumours were of low relevance to humans. Eventually RAC concluded that the very low incidence of urinary bladder tumours at the top dose only in mice in combination with a lower sensitivity in humans was not sufficient evidence for classification. RAC however noted that the maximum tolerated dose (MTD) was not exceeded at the top dose, because the animals were killed for humane reasons due to ulcerative skin lesions in the anogenital region, but there was no severe systemic 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.

4. 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]

The Chairman welcomed the expert accompanying the Cefic stakeholder attending the meeting and reported that the substance is mostly used as a stabiliser in plastics. The legal deadline for the adoption of an opinion is 17 April 2019.

The substance has an existing entry in Annex VI to the CLP Regulation (Repr. 1B; H360D).

At the beginning of the discussion RAC supported the rapporteurs proposal that studies on DOTE itself, DOTE:MOTE and the analogues DOTI and DOTI:MOTI, should be considered in the assessment of DOTE, as well as data on DOTC. According to industry, structural similarity of the substances considered is not a sufficient justification to apply a read-across approach to DOTC. Moreover, no DOTC is formed when DOTE is metabolised (based on an *in vitro* hydrolysis study with DOTE). In industry's opinion the classification of DOTE should be based on results of tests done on the substance itself. RAC however pointed out that it had been concluded that read across from DOTI:MOTI is appropriate by several bodies and that the DOTE classification was mainly based on read across data from those substances.

Based on the data from three species (rats, mice and rabbits), and the knowledge of thymotoxicity of organotin compounds, RAC supported the thymus as a target organ after repeated exposure to DOTE. Adverse effects occurred below the Guidance value for STOT RE 1 of 10 mg/kg bw/d for an oral 90-day study, and RAC therefore supported STOT RE 1; H372. To be in line with previous opinions of organotins, and contradictory to the DS proposal, RAC agreed to specify the immune system (rather than the thymus) in the hazard statement.

The DS proposed to modify the current classification of DOTE to Repr. 2; H361d, based on 2 new studies on DOTE. However, RAC concluded that considering the marginal general toxicity at the highest dose levels in the 2 new studies on DOTE (60 to 80 mg/kg bw/d) and the significant trends for developmental toxicity in those studies, it is highly likely that DOTE will have clear developmental effects at higher dose levels. This is supported by the results of the studies with the closely related substance DOTI, which included increased post-implantation loss, increase incidence of resorptions, increased pup mortality, depressed foetal weight, and increased malformations at 100 mg/kg bw/d. Given the close structural similarity between DOTE and DOTI, the clear evidence of developmental toxicity in the studies with DOTI and the outcome of the new studies which indicate that DOTE would have comparable effects at higher doses, RAC considered this as sufficient evidence to retain the current classification for DOTE as Repr. 1B (H360D). One RAC member asked the Rapporteurs to shortly reflect on effects on lactation

in the opinion, to be sure that the conclusion not to classify for the effects seen postnatally were in line with previous RAC opinions.

Concerning classification for environmental hazards the Rapporteurs presented uncertainties on log Kow (>10), water solubility (poor water solubility), impurity (2-ethylhexyl mercaptoacetate (EHTG), 3-12%) which might have impact on degradability (not rapidly degradable). RAC considered that DOTE is potentially bioaccumulative.

For the acute aquatic classification, the RAC did not agree with the DS proposal (no classification) and proposed to classify as Aquatic Acute 1; H400. This was based on an EC50 of 24.12 mg/L for *Daphnia* and no available experimentally determined water solubility (but considered to be lower than 1 mg/L). High measured values were considered to be potentially due to undissolved substance (although no evidence of physical effects by suspended substance was provided). Although no reliable water solubility is available, it is considered to be below the 1 mg/L cut-off for aquatic acute classification. As effects were seen above the water solubility limit, RAC agreed to classify based on the assumption that the water solubility is considerably below 1 mg/L and consequently concluded that DOTE warrants classification as Aquatic Acute 1; H400.

Concerning the Aquatic chronic classification, the Rapporteurs did not agree with the DS's proposal (Aquatic Chronic 2; H411) and they proposed to classify DOTE as Aquatic chronic 1; H410. The proposal was based on a NOEC of 0.286 mg/L and a lack of experimental water solubility data (considered to be lower than 0.1 mg/L). High measured values were potentially due to undissolved substance (no evidence of this was provided) although no evidence of physical effects by undissolved substance were observed. Following the same principles outlined for the aquatic acute classification, RAC agreed to classify DOTE for Aquatic chronic 1; H410.

Due to the lack of reliable data on water solubility, RAC decided it was not possible to specify M-factors.

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. hexythiazox (ISO); trans-5-(4-chlorophenyl)-N-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that hexythiazox (ISO) is a pesticidal active substance. The substance already has an existing entry in Annex VI to the CLP Regulation as Aquatic Acute 1; H400 and Aquatic Chronic 1; H410. The legal deadline for the adoption of an opinion is 20 April 2019.

He reminded the Committee that only carcinogenicity and environmental hazards are addressed in this CLH dossier. Assessments of the mutagenic potential of this substance and its general systemic toxicity following repeated dosing are included to the extent they relate to conclusions about the carcinogenicity endpoint.

The DS (FI) proposed to retain the existing Acute and Chronic aquatic 1 classification for environmental hazards and to add M-factors of 1 for both. RAC agreed to the DS proposal via the fast-track procedure. No classification was proposed for carcinogenicity. With regard to carcinogenicity, RAC assessed two studies; one in mice and another in rats. There was an increased incidence in thyroid parafollicular cell adenoma in male rats at the top dose (no statistical significance, no clear dose-response, within the historical control data (HCD) range of the conducting laboratory, above the US National Toxicology Program (NTP) HCD range), testicular cell (Leydig cell) adenoma (only at the interim sacrifice; dose-related increase at mid and high dose, above the HCD range of the conducting laboratory) and mammary gland

fibroadenoma (a dose response, statistically significant in tests for adjusted and unadjusted trend and cox analysis, insignificant in pairwise comparison of control and high dose group, at the top dose above the HCD range of the conducting laboratory, within the US NTP HCD range) in male rats as well as statistically non-significant increase in hepatoblastoma at the top dose in male (above HCD range of the conducting laboratory and US NTP) and female (above HCD range of the conducting laboratory, within the US NTP HCD range) mice and statistically significant increase in liver adenomas in female mice at the top dose (almost within the HCD range of the conducting laboratory). The available historical control data for all these tumour types was not contemporary to the studies being evaluated. Several members expressed concern about hepatoblastoma, because it was considered to be a rare malignant tumour and relevant to humans. The observed anisonucleosis was considered to support the concern by some members. Two members referred to the increased incidences of adenomas in rats as possibly supportive evidence. Several members did not consider the available HCD relevant as it was not contemporary to the study being evaluated. One member noted that the tested doses were lower in rats as compared to mice, and therefore it was not possible to exclude the formation of additional tumours at higher doses also in rats. However, on balance, RAC considered that the mouse strain used was known to have a high spontaneous background incidence of liver tumours (2/3 of mice with hepatoplastoma were found to have also liver adenoma or carcinoma, indicating high levels of liver toxicity), and that the observed hepatoblastoma observed only in this sensitive mouse strain as well as the observed adenomas in rats did not provide sufficiently reliable evidence for classification.

Altogether, RAC concluded there was not sufficient evidence for classification of hexythiazox (ISO) for carcinogenicity and adopted the opinion by consensus. The Chairman thanked the Rapporteurs for the presentation of the arguments and the Committee Members for their comments.

6. flurochloridone (ISO); 3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting and reported that the substance is a herbicide approved as an active substance in plant protection products. It has no existing entry in Annex VI to the CLP Regulation. The legal deadline for the adoption of an opinion is 31 March 2019.

The DS (ES) proposes to classify flurochloridone (ISO) as Acute Tox. 4; H302, Skin Sens. 1; H317, Repr. 1B, H360Df, Aquatic Acute 1; H400 (M=100) and Aquatic Chronic 1; H410 (M=100).

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for physical hazards, acute toxicity via dermal and inhalation route, STOT SE, skin/eye irritation, STOT RE, germ cell mutagenicity, carcinogenicity and classification as Acute Tox. 4 (oral); H302 (ATE = 500 mg/kg bw), Skin Sens. 1; H317, Aquatic Acute 1; H400 (M=100) and Aquatic Chronic 1; H410 (M=100).

With regard to reproductive toxicity, studies with rats, mice, rabbits, dogs and monkeys were assessed for sexual functionality and fertility. Clear adverse effects were observed in rat studies but not in other species suggesting possibly a species-specific mode of action. However, RAC concluded there was not sufficient evidence to support species-specificity and noted that the absence of similar effects in mice, rabbits, dogs and monkeys could be due to the dose selection in the studies. The expert accompanying the ECPA stakeholder stated that in their opinion category 2 would be more appropriate, as the studies seem to suggest that rat is more sensitive than the other species tested and as no effects were observed in monkeys, the relevance for humans of the results in rats is further reduced. The ECPA stakeholder expert disagreed with

the assessment that differences in dose selection or toxicokinetics would compromise the monkey and mouse studies which were dosed at a higher level than the rat LOAELs.An analysis of rat gavage and dietary study results suggest that gavage application, as used in monkeys, is the worst case exposure scenario. He further highlighted that the species-specific target toxicity hypothesis is supported by an *in vitro* study showing toxicity towards rat but not human Sertoli cells and cited two studies in peer-reviewed literature with regard to the potential toxic mechanism in rat. Regarding the *in vitro,* peer reviewed studies provided by the ECPA stakeholder, RAC highlighted the lack of a justification for the dose selection (concentrations tested showed cytotoxicity) and the results of the studies were difficult to interpret as no changes either in rats or humans were statistically significant and for some parameters no dose-response was observed and the results were variable.

RAC concluded that flurochloridone showed clear fertility effects in male rats, which are in general considered to be less sensitive, and because there is no information on mechanism of toxicity to exclude human relevance, RAC considers that category 1 is appropriate for reproductive toxicity.

RAC considered category 1 warranted for developmental effects based on clear evidence of teratogenicity and an observed dose-response in the PNDT studies with rats, as substance related effects were observed that could not be attributed to maternal toxicity. The ECPA stakeholder expert stated that in their opinion category 2 would be more appropriate because there would be no evidence of foetal malformations in the absence of maternal toxicity and similarly only foetal toxicity in the presence of maternal toxicity. This pattern could be observed in rat and also in the rabbit, however in rabbit only as "slight fetal toxicity" and without malformations.

However, in view of clear evidence of teratogenicity in the rat studies that could not be attributed to maternal toxicity, RAC concluded that classification as Repr. 1B; H360DF is warranted for flurochloridone.

RAC agreed that no classification is warranted for aspiration hazard based on the substance physical state being a solid at 20°C and 101,3 kPa and no human data indicating evidence of this 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. iprovalicarb (ISO) isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting and reported that the substance is used as a foliar-applied fungicide. It has no existing entry in Annex VI to the CLP Regulation and the legal deadline for the adoption of an opinion is 20 April 2019.

The DS (IE) proposed to classify iprovalicarb as Carc. 2; H351.

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), eye irritation/damage, skin irritation/corrosion, skin sensitisation, STOT SE, germ cell mutagenicity, reproductive toxicity and environmental hazards.

RAC discussed STOT RE and concluded that liver is the target organ, noting that the effects observed in rats and mice are clearly above the guidance values for classification. Although dogs are considered more sensitive, the effects seen at doses relevant for classification are not severe

enough for classification and are considered reversible. In addition RAC noted that the dose response for liver effects is not steep which lessens the concern. RAC concluded that no classification is warranted for STOT RE.

With regard to carcinogenicity, RAC discussed the effects found in the mouse and rat studies. One RAC member noted that there are three types of rare tumours in rats which raise concern. RAC highlighted that there is increase in thyroid follicular adenoma in females which was outside HCD and treatment relation cannot be disregarded.

One RAC member requested that the opinion should be made clearer on which historical control data is considered relevant. In addition, RAC members noted that the increase in uterine tumours and decrease in pituitary and mammary gland tumours in Wistar rats could be inversely related, possibly in relation to prolactin regulation and therefore relevant for classification.

The stakeholder observer expert reiterated industry's position that no classification is warranted considering that the substance is not genotoxic and the rare tumours were found only at high doses. In addition, no dose related increase in total tumour incidences was observed.

RAC concluded that although tumours appeared at high doses and in a single species only, they are nonetheless rare and of concern. RAC also took the low incidences, lack of evidence of pre-neoplastic changes and the fact that substance is non-genotoxic into account, agreeing that classification as Carc. 2; H351 is appropriate in line with the dossier submitter's proposal.

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

8. 2,4-dinitrophenol

The Chairman reported that 2,4-dinitrophenol is an industrial chemical used as an intermediate in the manufacture of other chemicals and as an additive in the manufacture of textile, leather and fur. Since the early 20th century, it has also been used as a weight loss agent but since the late 1930s it has not been approved for such use.

The legal deadline for the adoption of an opinion is 27 April 2019.

The substance has an entry in Annex VI to the CLP Regulation as Acute Tox. 3* (=minimum classification for all routes of exposure), STOT RE 2*, H373** and for aquatic acute hazard as Aquatic Acute 1, H400.

RAC agreed the following hazard classes via the fast-track procedure, i.e. with scrutiny but without plenary debate: Acute Tox. 2; H300 with an ATE (oral) of 30 mg/kg bw.

In the discussion on acute dermal toxicity, the Committee supported classification into category 3. RAC further concluded that a converted acute toxicity point estimate of 300 mg/kg bw would be appropriate for the dermal route considering the LD_{50} value based on an old, non-standard study was possibly an underestimate.

As regards repeated dose toxicity, the Committee agreed that the available human data should be given more weight and that based on medical cases and the well-known mode of action of 2,4-dinitrophenol, i.e. suppression of adenosine triphosphate (ATP) production, leading to a general failure of the whole organism, category 1 for repeated dose toxicity without specification of target organs is warranted.

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

9. phosphine

The Chairman reported that the substance is used as an insecticide, as an industrial chemical in semiconductor products and for the manufacture of electrical, electronic and optical equipment. The substance has an existing entry in Annex VI to the CLP Regulation as Press. Gas, Flam. Gas 1; H220, Skin Corr. 1B; H314, Acute Tox. 2*; H330, Aquatic Acute 1; H400 and Note U. Only acute inhalation toxicity is addressed in this CLH dossier, and the DS (FR) proposes to modify the current minimum classification to Acute Tox. 1; H330 (inhalation) and add ATE = 11 ppmV. The legal deadline for the adoption of an opinion is 14 March 2019.

RAC concurred with DS proposal to modify the current minimum classification to Acute Tox. 1; H330 (inhalation).

The DS proposed an ATE value of 11 ppm based on the lowest LC_{50} value for 4-hour exposure obtained from the Waritz and Brown (1975) study, which had previously been considered for the classification of metal phosphides by RAC. RAC concluded that taking into account the varying quality of the old studies available and the steep dose-response shown in most, the converted acute toxicity point estimate given in CLP Annex I, Table 3.1.2. was most appropriate for the derivation of the ATE value. An ATE of 10 ppmV was also supported by the available database giving 4-hour LC_{50} values in the range of 11-57 ppm. RAC concluded to classify phosphine as Acute Tox. 1; H330 (inhalation) with the ATE value of 10 ppmV.

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. dibenzo[def,p]chrysene

The Chairman reported that the polycyclic aromatic hydrocarbon dibenzo[def,p]chrysene is an industrial chemical. Polycyclic aromatic hydrocarbons (PAHs) are contained in certain petroleum and coal streams, and potentially in material derived thereof and may be formed by combustion. The substance has no existing Annex VI entry and the legal deadline for the adoption of an opinion is 29 May 2019.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: mutagenicity (Muta 2; H341).

As to carcinogenicity, RAC noted a strong carcinogenic potential through oral and dermal administration resulting in benign and malignant tumours relevant to humans observed in different organs in three species which lead to classification in category 1B (Carc. 1B; H350). RAC further agreed that a specific concentration limit for mixtures containing the substance is justified for dibenzo[def,p]chrysene due to tumour development occurring at very low doses after short treatment periods and therefore assigned an SCL of 0,001% for the substance.

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. mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting. It was noted that mancozeb is an active substance used in plant protection products authorised in the EU as a fungicide. The Chairman further communicated that the hazard classes of mutagenicity and carcinogenicity would be considered at RAC-48.

Mancozeb has an existing entry in Regulation 1272/2008/EC (the CLP Regulation) as Repr. 2 (H361d***), Skin Sens. 1 (H317) and Aquatic Acute 1 (H400) with an M factor of 10. The legal deadline for the adoption of an opinion is 30 June 2019. Mancozeb is being assessed in parallel by EFSA.

The DS (UK) proposed to remove the existing classification for reproductive toxicity, to add classifications as STOT RE 2; H373 (thyroid, nervous system) (oral) and Aquatic Chronic 1; H410 (M=10) and to retain the existing classifications for skin sensitisation and aquatic acute toxicity.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: classification as Skin Sens. 1; H317, Aquatic Acute 1; H400 (M=10) and Aquatic Chronic 1; H410 (M=10).

The Rapporteur introduced the active substance as well as its main metabolite ethylene thiourea (ETU),pointing out that mancozeb is part of a family of dithiocarbamates which includes maneb (Mn) and zineb (Zn) and that ETU is a teratogen and a thyroid toxicant.

The classification proposal for STOT RE 2 (thyroid, nervous system) was proposed by the DS on the basis of histopathological lesions accompanied by changes in thyroid hormones in several species investigated after repeated oral exposure.

The Rapporteur mentioned that there were two main target organs for discussion and possible classification i.e. the thyroid and the nervous system.

While proposing classification for the thyroid as STOT RE 2, the DS (UK) considered the thyroid effects of limited relevance to humans due to interspecies differences in thyroid physiology. In addition, the DS considered that although hypothyroidism induced by mancozeb may be relevant to humans, the weight of evidence (WoE) supported the contention that thyroid cell proliferation and hyperplasia is unlikely to occur in humans. The Rapporteur proposed to base the STOT RE 2 classification on reduced T4 levels in several species. He inferred qualitative and quantitative human relevance of the rat findings from the proposed mode of action (MoA) (TPO inhibition) and comparison of the LOAELs for T4 reductions by ETU in the rat and the monkey. Effects are caused by the metabolite of mancozeb, ETU and species sensitivity differs due to differences in the metabolism of ETU.

The expert accompanying the ECPA stakeholder confirmed that the thyroid gland is a target organ for mancozeb in repeated dose toxicity studies in several species. For the expert, the main question is whether mancozeb has effects below the guidance value relevant for STOT RE 2. In the rat, it has effects below GV but the rat is more susceptible than humans. In the dog, effects are mostly observed above the guidance value in 3/5 studies so she questioned that other factors might have affected the thyroid in dogs like poor general health condition (mortality and inappetance). She concluded that the dog does not provide convincing evidence in support of STOT RE. Further, the expert considered that the old monkey study is of questionable reliability. The monkeys were reported to be wild caught animals and in the first part of the study, some monkeys suffered from tuberculosis. In the second part of the study, the health status of the monkeys may have been low as well (subclinical tuberculosis), supporting the hypothesis that they may have been more susceptible to the effects of ETU. The expert finally concluded on about a 6-fold difference in susceptibility of ETU effects between monkeys (humans) and rats i.e. ~ 6 mg/kg bw vs. 1 mg/kg. The expert also pointed out that the monkey study was conducted on ETU and not mancozeb itself.

RAC supported the view that the thyroid effects in dogs, in rats as well as in monkeys cannot be discounted and warrant STOT RE 2 classification, noting that hyperplasia was observed in some studies accompanied by decreased T4 and increased TSH. Regarding the monkey study, the Rapporteur responded that the phase 1 of the study was disregarded but that there was no

reason to discount phase 2 of the study. The Rapporteur also questioned the 6 fold difference in susceptibility between monkeys and rats since the extended one-generation reproduction study (2013) showed a T4 reduction of 30% at 2 mg/kg which is of similar magnitude than the 60% reduction at 6 mg/kg in the monkey study. The Rapporteur also noticed that the LOEL did not change from several months to 2-y exposure in rats.

Concerning neurotoxicity, the classification proposal for STOT RE 2 was based on clinical signs (hind limb weakness and paralysis, ataxia) and histopathological findings (demyelination, Schwann cell proliferation) in the rat. According to the expert accompanying the ECPA stakeholder, mancozeb-induced neurotoxicity has only been observed intermittently in rats at doses below the guidance values for STOT-RE and the effects were not severe. Histopathological lesions were observed in only 1 or 2 animals out of 10 per group. The Industry expert also questioned human relevance of these findings because they were not seen in other species than rat. RAC however supported the DS proposal for classification and agreed to add nervous system to the target organs.

Mortality in the dog, rat and rabbit was not considered sufficient to trigger classification on its own but provides additional support for STOT RE 2 triggered by other effects (thyroid, nervous system).

According to the Rapporteur the conditions for specification of the exposure route were not fulfilled due to results of the rat developmental toxicity study via inhalation and lack of dog studies via dermal and inhalation routes. RAC supported the Rapporteur's conclusions.

RAC agreed to classify the substance as STOT RE 2; H373 (thyroid, nervous system).

The Rapporteur presented a summary of the studies relevant for developmental toxicity. He did not support the DS's proposal to remove the existing Repr. 2 classification and proposed Repr. 2 or Repr. 1B to RAC.

The ECPA observer expressed a need for more time for industry to provide comments on RACs proposal to increase the classification to Repr. 1B while the current classification is Repr. 2 and the DS had proposed to remove the latter classification. The ECHA Secretariat clarified that RAC is not restricted by the DS proposal to a particular course of action and can conclude that a stricter or less strict classification is warranted, as also explained on the ECHA website for public consultations. The Chairman noted that RAC would agree at this meeting on the endpoints discussed. Any comments or reflections from Industry on the discussion for the classification of toxicity to reproduction would be taken into consideration as far as possible with respect to the final opinion.

The following arguments support a decision to retain or upgrade the classification for developmental toxicity. The mancozeb-induced malformations (An., 1980) are not secondary to maternal toxicity. These are severe, especially the dilated brain ventricles, occurring due to destruction of brain tissue. ETU used as a positive control caused malformations clearly in the absence of maternal toxicity. The top dose in An (1980) had a pronounced effect and the threshold is likely to be lower – at a dose causing presumably marked but not yet excessive maternal toxicity. Therefore, in studies with mancozeb, the threshold for brain malformations can be expected to occur without excessive maternal toxicity. RAC stressed that a negative study should not be used to dismiss positive results, including from older studies like by An. (1980) and that even if not carried out under GLP, it is still considered valid (see further below). RAC also noted that in An (1980) there was one case of dilated brain ventricles at 128 mg/kg bw (with only limited maternal toxicity) and there is no reason to exclude this single case, suggesting a treatment related effect and a dose-response between 128 mg/kg bw and 512 mg/kg bw.

One RAC member noted that other possible effects of high concern for human health (potentially resulting from T4 reduction) are loss of memory and learning, noting that the substance had not been sufficiently assessed for neurodevelopmental toxicity. The Rapporteur summarised that in An. (2008c), there were no effects seen but low doses were tested and T4 was also not convincingly reduced. The published study of Axelstad *et al*. (2011) had a limitation of an exceptionally low threshold for maternal toxicity. With ETU only, the EOGRT study (An., 2013) did not investigate effects on learning and memory. The recent human epidemiological study by van Wendel de Joode et al. (2016) studying pesticide exposure and neurodevelopment in children aged 6 to 9 years from Talamanca, Costa Rica, was not convincing as it only reported poorer verbal learning abilities associated with higher urinary ETU levels and no effects on nine other neurobehavioural outcomes. One RAC member also reported that a recent study (October 2018) conducted in mice had reported hypothalamus effects. The Rapporteur replied that this study was not included in the opinion due to its late arrival in the process[4].

One RAC member was concerned about possible differences in metabolic rates of ETU between humans (half-life from 19 to 23 hours) and rats (excreted within 24 hours) suggesting that the half-life could be shorter in rats. The Rapporteur could not confirm that humans would be more susceptible than rats on this basis. The expert from industry clarified later that the human study was after dermal application and therefore, it cannot be compared to rat oral toxicokinetics data.

RAC noted that the most recent studies conducted by An. 2015b,c,d did not demonstrate that maternal toxicity was excessive. However, even a single dose of 30 mg/kg bw ETU is capable of inducing severe brain malformations. Considering the low acute toxicity of mancozeb, it is plausible that teratogenic levels would be achieved without significant maternal toxicity. Specifically, the possibility that mancozeb might cause malformations after a single dose without induction of maternal toxicity and the fact that the malformations are not secondary to maternal toxicity indicates a need to consider classification in Category 1B. In weighing the evidence in line with section 3.7.2.3. of Annex I to the CLP Regulation, RAC assessed the results of the old (pre-GLP/OECD) studies and the new ones.

The expert accompanying the ECPA stakeholder in her intervention presented the industry positon on several points.

First, the An. (1999b) study conducted at 500 mg/kg bw study is not reliable. This position is also shared, according to industry, by previous regulatory bodies. One hypothesis is that the doses administered in rats might have been miscalculated, leading to developmental findings of questionable significance and no maternal toxicity. Therefore, An. (1999b) should not be considered.

Secondly, regarding the conversion of a dose of mancozeb to ETU, industry's analysis showed that it should be 3.5%. This figure is derived from a metabolism/distribution study in rats where, on a molar basis, approximately 18% of mancozeb is metabolised to ETU. On a molecular weight basis, this results in a figure of 7% of the dose. Since the gastrointestinal absorption of mancozeb after oral administration is 50%, the figure of 7% should be reduced to 3.5%. In An. (2015) studies, a more detailed toxicokinetic analysis confirmed this figure. Therefore, according to industry, the dose level of mancozeb that would be needed to reach a developmentally toxic dose of ETU (30 mg/kg bw) would be far too excessive i.e. around 860 mg/kg bw mancozeb. The expert further added that mancozeb is assumed to be more toxic to pregnant animals so a dose level of 860 mg/kg bw cannot be tested. In relation to the discussion on a single dose toxic to the developing foetus, there are no studies showing mancozeb causing malformations after a single dose. This study design is not an OECD recommended Test Guideline and there are probably many chemicals able to cause malformations after single dose. In view of the above,

[4] After RAC had been consulted in writing on the draft opinion

the expert concluded that a study showing malformations after a single dose of mancozeb is not a testable hypothesis.

Then the expert clarified how the industry decided on dose levels in the most recent key studies of An. (2015c,d) where 160 mg/kg bw/d has been chosen. In the dose selection, industry took into account that pregnant animals are generally considered as more sensitive than non-pregnant ones. In addition, 360 mg/kg bw from An. (1988) study caused marked maternal toxicity. Also the publication of Axelstad *et al*. (2011) reported high maternal toxicity at 150 mg/kg bw with only a few days of dosing. In the older studies, the dosing period was shorter i.e. from GD 6 to 15 (instead of 19) so a longer exposure duration would be required to be in compliance with the current OECD TGs. Finally, a dose-range finding study in non-pregnant rats (14-day tolerability study, An. 2015b) showed maternal toxicity (10% decreased body weight gain) at all dose levels of 300, 240 and 180 mg/kg bw. Overall, taking into account the above, industry selected 160 mg/kg as the top dose in the main study of An. (2015c,d) where no developmental toxicity and limited maternal toxicity were observed. Industry nevertheless pointed out that in An. (2015c), there was a 37% drop in bw gain from GD 9 to 12 at that dose. Between GD6 and GD20, there was overall a 20% loss in bw gain so it was, according to industry, already an alert. This is why 160 mg/kg bw was selected for the main study (An., 2015d). In the main study, there was a less pronounced bw gain loss (14%) but it was associated with a reduction in food consumption. The net mean bw gain (without accounting for the uterus) was 26% lower than in controls. Therefore, industry argues that based on the OECD TG 414, they had reached the criteria for the level of maternal toxicity. Industry considers that with these doses they had met the OECD-guidance criteria for dose selection in developmental toxicity studies and the results are negative.

The Rapporteur understood the process for the selection of the top dose in recent studies but according to him those studies could not be considered in isolation and were not the critical factor in assessing classification. RAC considered that the results of the main PNDT study An. (1980) are still valid. This is a well-conducted study (following EPA guideline no. 870.3700) for which the deviations from the current OECD test guideline 414 (2018) do not affect the results of the study. RAC did not agree to the assumption that the pregnant animals are markedly more sensitive than non-pregnant ones. The industry replied that a decrease of 30% bw was observed in pregnant rats compared to 8% in non-pregnant (14-day tolerability study). However, the rapporteur argued that the corrected net bw had to be used and there was a decrease of 6.5% so in the end comparable between non-pregnant and pregnant animals.

Furthermore, the Rapporteur in examining the robust study summaries of the toxicokinetic studies An (1986f,g), questioned the conversion value of ETU of 3.5%, proposed by the industry expert. The recent 2015 studies did not report all toxicokinetics figures so it is unclear if the 3.5% conversion rate of mancozeb to ETU is correctly estimated.

During the discussion, some RAC members supported classification in category 2. They justified it by the clearly negative results obtained in the most recent studies in the rat by An. (2015c,d), by uncertainties regarding the ability of mancozeb to cause malformations without some maternal toxicity, pointing to consistency with the previous classification decision from TC C&L (2005/2006) and the lack of any new key data since then and by a preference for classification based solely on the data on mancozeb, not its metabolite ETU. Moreover, mancozeb would be expected to cause malformations only at high doses, where sufficient ETU would be formed.

However, a majority of RAC members were in favour of classification as Repr. 1B. In their opinion the PNDT study An. (1980) was still the key study for classification of mancozeb. It was considered unlikely that the type and severity of brain malformations (caused by ETU used in a separate positive control group) could be related to maternal toxicity. Although the top dose in this study was associated with clear maternal toxicity, the occurrence of malformations at lower

doses, with less severe maternal toxicity was considered likely. As to the new PNDT study An. (2015c,d), several RAC members were of the opinion that the dose of 160 mg/kg bw/d was too low and that the study did not sufficiently address the concerns raised by the An. (1980) study, nor can these studies be considered in full accordance with the latest revision of the OECD test guideline 414. One member added that it is generally very important to have a clear dose response curve in the test results. Several members mentioned potential effects of a single dose of mancozeb, given a 3.5% transformation to ETU, although the ECPA expert confirmed the absence of single dose developmental toxicity data for mancozeb. RAC questioned whether the severe developmental affects after a single dose of ETU were available to the previous committee who decided to classify mancozeb under the TC C&L (2005/2006).

One RAC member raised the additional concern of the unknown toxicokinetics of mancozeb in humans, which could influence its toxicology profile. The expert confirmed the absence of relevant toxicokinetics data between humans and rats. One RAC member also reported that while the acute toxicity of mancozeb in non-pregnant rats is low (no mortality or clinical signs of toxicity at 2000 mg/kg bw), the pregnant rats seem particularly susceptible to mancozeb. Therefore, the RAC member questioned the validity of available LD_{50} values for mancozeb. An additional concern raised by another RAC member is the lack of assessment on possible neurodevelopmental effects of mancozeb (in particular learning and memory), which are likely to occur at doses of mancozeb not causing maternal toxicity.

RAC concluded to classify mancozeb as Repr. 1B for development, noting the DS proposal to declassify and the current Repr. 2 classification transposed from DSD but also noted that the TC-C&L discussions had also strongly considered 1B as an option.

In conclusion, RAC agreed to classify mancozeb as follows: Repr. 1B; H360D, Skin Sens. 1; H317, STOT RE 2; H373 (thyroid, nervous system), Aquatic Acute 1; H400 M=10, and Aquatic Chronic 1; H410 M=10.

Discussion and agreement on mutagenicity and carcinogenicity are scheduled for RAC-48.

12. 2-(4-tert-butylbenzyl)propionaldehyde, lysmeral

The Chairman welcomed the expert accompanying the Cefic stakeholder observer and the industry dossier submitter attending the meeting and reported that lysmeral is used as fragrance in cosmetic/personal care products and washing/cleaning products. It has no existing entry in Annex VI to the CLP Regulation. The legal deadline for the adoption of an opinion is 16 June 2019. The DS (Industry) proposes to classify it as Repr. 2; H361f.

Under the heading of fertility, RAC discussed the effects on spermatozoa as well as testes seen in several studies in rat and dog. Most studies are via the oral route, but effects have also been seen after dermal exposure in rat. According to the dossier submitter, guinea pig, mouse, rabbit and monkeys have been shown to be less sensitive to the effects compared to rat and dog, and based on kinetic data it was proposed that humans would also be less sensitive. RAC noted that the formation of the metabolite TBBA (which has a harmonised classification as Repr. 1B; H360F) is considered as a key event in the toxicity and that the species difference in sensitivity is proposed to be due to differences in the amount of TBBA formed. Hence, RAC saw the difference as quantitative only and this was questioned by the DS. The latter agreed on the formation of TBBA being a quantitative difference between humans and rats, but argued that the conjugation with CoA (proposed to be the MoA causing the toxicity) can be considered a qualitative difference as *in vitro* studies with hepatocytes have shown that the concentration of TBBA-CoA decreases quickly in human hepatocytes while it increases in rats. Several members noted that the proposed MoA is studied by using hepatocytes and what happens in testicular cells is not known.

One member also pointed out that studies indicate that the levels of TBBA-CoA conjugate in testis is 100-fold lower and proposed that the effects in testis could be due to direct activity of TBBA. It was also noted by several members that the findings from *in vitro* studies are difficult to convert to what happens *in vivo*. The dossier submitter argued that dermal exposure is the most relevant route for humans, and that a 10-fold lower concentration of the applied dose was seen in human urine compared to rats after dermal exposure. RAC however pointed out that classification is hazard based and that what is considered to be the most relevant exposure route should not be taken into account in determining classification. Regarding the repeated dose dermal toxicity study, one RAC member also highlighted that the available human and rat data for dermal absorption cannot be compared due to differences in application (non-occlusive versus occlusive) and this should be reflected more clearly in the opinion. One RAC member pointed out that when assessing the effects, the whole dataset should be used, including the range finding studies, especially as the dosing for the EOGRT study was not adequate to detect fertility effects. RAC concluded that human relevance cannot be disregarded based on the proposed MoA, as although plausible it is not clear whether it is the sole cause of the effects. In addition, the species differences proposed are quantitative only. RAC concluded that classification as category 1B for fertility is warranted due to clear effects on spermatozoa and testes.

Regarding effects on development, RAC discussed the post-implantation losses and decreased foetal weight observed in the extended one-generation reproduction study (EOGRTS) and prenatal development (PNDT) study, and whether they could be considered secondary to maternal toxicity or not. Maternal toxicity was seen at high doses, but effects on the mid doses were not as prominent. Some members argued that developmental effects were seen also at doses not causing maternal toxicity, and could not be explained by maternal toxicity even at the highest dose. One member pointed out that to dismiss effects seen in foetuses it should be unequivocally proven that the effects were non-specific consequences of maternal toxicity, and argued that this was not the case for lysmeral. For example, a 3-fold increase in post-implantation loss compared to controls were seen already at 40 mg/kg bw/day. It was also pointed out that a decrease in foetal body weight of up to 20% was seen even in the absence of maternal toxicity. Some members argued that the effects should not to be seen as secondary to maternal toxicity but did not consider that the effects were sufficient to justify classification and hence supported no classification. One member noted that the effects were clear but with some variability making it uncertain whether classification was justified. Several members argued that effects were consistently seen in several studies which would support classification. The dossier submitter reiterated their position for no classification highlighting the observed maternal toxicity in the PNDT study.

RAC concluded the developmental effects were sufficient to justify classification in category 2 and that they could not be dismissed due to maternal toxicity. Therefore classification as Repr. 1B; H360Fd is warranted for lysmeral.

It was agreed that the 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.

13. 4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT)

The Chairman welcomed the experts accompanying the Cefic and ECPA stakeholders attending the meeting and reported that DCOIT (4,5-dichloro-2-octyl-2H-isothiazol-3-one) is an existing biocidal active substance approved for uses such as wood preservatives (PT8) and antifouling

agents (PT21). The legal deadline for the adoption of an opinion is 17 July 2019 and the dossier submitter is Norway. The substance has no existing entry in Annex VI to the CLP Regulation.
RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate as follows: no classification for physical hazards, no classifications for acute dermal toxicity, no classifications for germ cell mutagenicity and carcinogenicity. For the acute toxicity via the oral route, RAC supported the DS proposal and agreed to classify the DCOIT within the category 4 based on the combined LD_{50} for mice 567 mg/kg bw.

RAC discussed the DS proposal to classify DCOIT for acute inhalation toxicity. Two options for the classification were discussed: Category 1, based on an LC_{50} = 0.21 mg/L derived from study 1 (exposure atmosphere consisting in a mixture of vapours and aerosol of DCOIT) and Category 2, based on an LC_{50} = 0.16 mg/L derived in study 2 (exposure atmosphere consisting of an aerosol of DCOIT only). RAC noted relevant differences in generating exposure atmospheres in study 1 compared to Study 2. In study 1, the material was melted and small particles below 4 µm were created in an airflow. In study 2 the solid material was finely ground (milled) just below the required particle size of 4 µm and aerosolised in DMSO as the vehicle. The Cefic expert confirmed that the substance is a solid at room temperature and has a very low vapour pressure. After discussion, RAC members agreed that the low vapour pressure of DCOIT makes it very unlikely that vapours would be produced and therefore the aerosol preparation in the second study is more relevant in this case. RAC agreed to classify DCOIT for acute inhalation toxicity Category 2 with an ATE = 0.16 mg/L. In addition to inhalation toxicity, RAC agreed to add the supplemental hazard information EUH071 (corrosive to the respiratory tract) to label substances and mixtures containing DCOIT.

Concerning the DS proposal for classification for skin corrosion, RAC supported Category 1 without sub-categorisation as there are no data on reactions at exposure times < 4 hours to allow for a direct assignment of a subcategory. For skin irritation, the DS also proposed an SCL of 0.01%. Based on human data, the DS concluded that irritation occurs at ≥ 250 ppm (0.025%) whereas the highest non-irritating concentration was identified at 100 ppm (0.01%) based on animal data. RAC members expressed concerns on using data from Guinea pigs which were pre-treated with mineral oil combined with Freund's complete adjuvant. RAC was of the view that a single exposure on a naive skin (usually on rabbits) would be more appropriate to determine an SCL. Concerning the human data, RAC also pointed out that DCOIT was dissolved in ethanol solution which can as such also cause skin irritation but that there was no clear dose response in irritation between 250 ppm (0.025%) and 350 ppm (0.035%) DCOIT. Keeping that uncertainty in mind, RAC agreed that the derivation of the SCL should be based on human data. Therefore, RAC agreed that substances or mixtures containing DCOIT should be classified as Skin Irrit. 2 from a concentration ≥ 0.025 %.

RAC noted that when a substance is classified as skin corrosion 1, then serious damage to eyes is implicit and supported the DS proposal for serious eye damage as Category 1 (H318) without the hazard statement code on the label. In addition, RAC agreed to apply the same SCL as for skin irritation so that substances or mixtures containing DCOIT should be classified as Eye Irrit. 2 from a concentration ≥ 0.025 %.

As there were no clear specific target organ identified in acute toxicity studies, local irritation effects at sites of contact were already covered by skin corrosion category 1 and EUH071 and no narcotic effects were reported, RAC agreed with the DS proposal to not classify DCOIT for STOT SE.

Concerning skin sensitisation, based on one LLNA study (EC3 = 0.03% < 2%) and one positive Guinea pig test, where the induction at concentrations 0.01, 0.02 and 0.33% (in mineral oil) caused responses in 75, 95 and 100% of the animals, the DS proposed Cat. 1A. Human data also provided further evidence for classification in sub-category 1A since induction occurred in human volunteers under patch testing at applied concentrations lower than 500 µg/cm^2. RAC agreed with the classification in subcategory 1A.

Regarding setting an SCL, due to its extreme potency, the DS proposed 0.001 % (10 ppm). The Cefic expert pointed out that the SCL should be substance-specific and based on the available human data where the concentration of 250 ppm (0.025%) is at or near the threshold concentration for sensitisation, noting that only one subject was sensitised at 250 ppm. RAC considered that there were different interpretations on the available human data possible. Overall, RAC agreed that DCOIT, albeit extremely potent, is not more potent than CMIT/MIT for which an SCL of 15 ppm had already been set and that this pointed to an SCL in a similar range. Therefore, RAC recommended to set an SCL of 0.0015% based on its potency in more general terms to reflect the body of data, rather than any specific piece of human or animal data on DCOIT.

Following further presentation of proposal of the Rapporteurs RAC agreed to not classify DCOIT for STOT RE, for fertility and sexual function neither developmental toxicity.

Concerning classification for environmental hazards the Rapporteurs agreed with the DS that DCOIT was not rapidly degradable. With the data available, RAC considered that it cannot be concluded whether DCOIT and its metabolites bioaccumulate or not, although this conclusion does not have an impact on the classification.

The Rapporteurs agreed with the DS's proposal to classify as Aquatic Acute 1 based on lowest test results in short-term aquatic toxicity data (24h) ErC50 of 1.6 µg a.s./L for *Navicula pelliculosa*). DCOIT is an isothiazolinone with a specific mode of action: the substance is taken up by algal cells and transformed, inducing a toxic response. This mode of action justifies the consideration of a 24h endpoint for classification purposes using initial measured concentrations. The highest effect occurs at this time period. General validity criteria for the test are met including a growth rate higher than 0.92 per day at 24 h. RAC agreed to classify DCOIT as Aquatic Acute 1; H400 with M=100.

The Rapporteurs also agreed with the DS's proposal for Aquatic Chronic 1, noting that data are available for all three trophic levels. In the opinion of the Rapporteurs the most suitable algal data was the 48h EC_{10} of 0.77 µg/L for *Navicula pelliculosa* (it covers several generations). That approach was supported by the RAC members although one member pointed that unique mode of action for algae should already show adverse effects in 24 h test. As a consequence, the lowest chronic toxicity value was a 21d NOEC of 0.4 µg/L for *Daphnia magna*, although all presented chronic toxicity data are in the same range. Consequently, RAC agreed to classify DCOIT as Aquatic chronic 1; H410 with M=100.

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. pirimiphos-methyl (ISO)

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that pirimiphos-methyl (ISO) is a broad-spectrum insecticide for use in grain stores and related industrial outlets. The substance has harmonised classification and labelling entry in Annex VI

of the CLP Regulation where it is classified as Acute Tox. 4*; H302, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410. The legal deadline for the adoption of an opinion is 1 August 2019.

The DS (UK) proposed to amend Acute Tox. 4; H302 (ATE=1 414 mg/kg bw), to add STOT RE 1; H372 (acetylcholinesterase inhibition) and an M-factor of 1 000 for Aquatic Acute and an M-factor of 1 000 for Aquatic Chronic, and to retain classification Aquatic Acute 1; H400 and Aquatic Chronic 1; H410.

RAC agreed the following endpoints via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for germ cell mutagenicity, and classifications for Acute Tox. 4; H302 (Oral: ATE = 1 414 mg/kg bw), Aquatic Acute 1; H400 (M = 1 000) and Aquatic Chronic 1; H410 (M = 1 000).

RAC then discussed STOT RE and carcinogenicity. On the former hazard class, studies in several species consistently showed inhibitory effects on acetylcholinesterase (AchE) activity, not always accompanied by clinical signs indicative of neurotoxicity. The RAC members discussed whether the observed ≥20 % of AchE activity inhibition could be considered as a significant toxicity level to classify the substance. RAC members noted that ≥20 % AchE inhibition (particularly in brain) is severe enough to classify the substance without waiting for the manifestation of clinical effects related to the enzyme inhibition in the brain. One RAC member suggested that the observed effects are also related to the peripheral nervous system, therefore she proposed to select 'nervous system' as the target organ, instead of 'central nervous system', as suggested by the Rapporteur. Other RAC members supported this proposal. RAC members agreed to classify the substance as STOT RE 1; H372 (nervous system).

During the discussion on carcinogenicity the rapporteurs noted that there were no effects observed in a mouse study. However, in a rat study there were marginally increased incidences of pancreatic and brain tumours (pancreatic islet cell adenoma in males and very small increase in meningioma in males, and ependymoma and ganglioneuroma in females). These were considered of spontaneous occurrence, and not related to treatment. No pre-neoplastic lesions or other evidence that tissues were target organs were observed. The substance is non-genotoxic, and no mechanistic basis for tumour formation are known. In addition, in mice using higher doses there were no tumours observed. RAC members agreed with no classification for carcinogenicity of pirimiphos-methyl (ISO).

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. octhilinone (ISO); 2-octyl-2H-isothiazol-3-one; [OIT]

The Chairman welcomed the experts accompanying the Cefic and ECPA stakeholder observers and reported that octhilinone (ISO) has a number of biocidal uses as a preservative, including an in-can preservative for non-food stuffs (product type 6) and a preservative for metalworking fluids (product type 13). The use as a wood preservative (product type 8) was approved (BPC Opinion: ECHA/BPC/139/2016).

The substance has harmonised classification and labelling entry in Annex VI of the CLP Regulation where it is classified as Acute Tox. 4*; H302, Acute Tox. 3*; H311, Acute Tox. 3*; H331, Skin Corr. 1B; H314, Skin Sens. 1; H317 (C ≥ 0.05 %), Aquatic Acute 1; H400 and Aquatic Chronic 1; H410. The legal deadline for the adoption of an opinion is 19 July 2019.

The DS (UK) proposed to amend Acute Tox. 3; H301, Acute Tox. 3; H311, Acute Tox. 2; H330, Skin Sens. 1A; H317 (C ≥ 0.005 %), to add Eye Dam. 1; H318, EUH071 and an M-factor of 100 for Aquatic Acute and an M-factor of 100 for Aquatic Chronic (note, this was the proposal after

PC; the chronic M-factor was 10 in the CLH report), and to retain classification Skin Corr. 1B; H314, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410.

RAC agreed the following endpoints via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for STOT SE, and classifications for Acute Tox. 3; H311 (dermal ATE = 311 mg/kg bw) and Eye Dam. 1; H318.

RAC then discussed acute oral and inhalation toxicity, skin corrosion, skin sensitisation and environmental (aquatic) hazards. On the former hazard class, the Committee agreed to classify the substance Acute Tox. 3; H301 (oral ATE = 125 mg/kg bw). The Cefic expert noted that a weight of evidence approach should be applied since two out of three GLP studies conducted in rats would suggest to classify the substance in category 4 instead of category 3. RAC however agreed to not dismiss the GLP study conducted in Sprague Dawley rats with the lowest LD_{50}. In addition, the Committee agreed with the DS to classify octhilinone as Acute Tox. 2; H330 (inhalation ATE = 0.27 mg/L (dust and mist)) and the supplemental hazard information EUH071 ('Corrosive to the respiratory tract') based on corrosivity leading to severe clinical (respiratory) signs in the inhalation toxicity studies. The Cefic expert considered that the whole-body exposure study should not be used for classification purposes because of possible additional uptake via the oral and dermal routes, thus influencing the LD_{50} results. They suggested to use the nose-only study in rats which would lead to a classification as Acute Tox. 3; H331. RAC however did not agree to dismiss the most recent GLP study conducted in Sprague Dawley rats with the lowest LD_{50} and confirmed the classification as Acute Tox. 2; H330 (inhalation ATE = 0.27 mg/L (dust and mist)).

The Committee also supported the rapporteurs, and agreed to classify octhilinone as Skin Corr. 1; H314. In two skin corrosion/irritation studies, both according to the OECD test guideline and done under GLP, the substance was found to be corrosive to the skin, causing irreversible necrosis of the dermal tissue, well-defined chemical burns, erythema and oedema until the end of the study. Exposure time was 4 hours in both studies, so there are no data on reactions at exposure times < 4 hours to allow for a direct assignment of a subcategory.

RAC agreed to classify the octhilinone as Skin Sens. 1A; H317 based on several animal studies supporting the subcategory 1A. Human data also provided further evidence for classification in subcategory 1A since induction occurred in human volunteers under patch testing at applied concentrations much below 500 $\mu g/cm^2$.

With regard to specific concentration limits (SCL) for skin sensitisation, it was noted based on the available substance information that octhilinone is a more potent sensitiser than several other isothiazolinones. Taking into consideration that from animal tests octhilinone can be regarded as a strong to extreme sensitiser, that there is cross-reactivity between the substance and MIT, and that there are case reports which indicate that concentrations lower than the proposed limit of 50 ppm may sensitise (in the absence of other isothiazolinones), RAC proposed to apply a weight of evidence approach and to set the SCL at 15 ppm (0.0015 %).

One RAC member noted that the categorisation of octhilinone as an extreme sensitiser could even lead to the default SCL of 10 ppm based on the Guidance of the application of the CLP criteria (V.5, July 2017). The Cefic expert responded that the categorisation of octhilinone as an extreme sensitiser should not be based on the Buehler assay which deviated from the OECD test guideline. On the SCL, she also reported that the SCL should be derived on the basis of induction (threshold) concentrations rather than elicitation concentrations, in particular from human cases reporting allergic (elicitation) reactions to products and without history of pre-exposure. She added that the special labelling phrase EUH208 for mixtures should prevent elicitation at a concentration 10 times lower than the SCL. She considered that cross-reactivity with MIT is not relevant since it has been effectively restricted and the intrinsic properties of octhilinone only

should be considered in the setting of an SCL. RAC however noted that octhilinone is more potent than other isothiazolinones and that cross-reactivity is relevant, should several isothiazolinones be used in the same consumer products. However, RAC acknowledged that cross-reactivity is not an intrinsic property of a single substance. The case report of a person induced at 28 ppm octhilinone with no other isothialzolinones reinforced the view of the Committee that 50 ppm will not protect people from induction. Overall, based on a weight of evidence, RAC supported the setting of the SCL at 15 ppm.

During the discussion on the environmental hazards the rapporteurs suggested that the degradation information did not provide sufficient data to show that the substance had ultimately degraded (mineralised) within 28 days (equivalent to a half-life < 16 days) or underwent primary degradation to non-classifiable degradants with half-lives < 16 days. Consequently, octhilinone was considered not rapidly degradable for the purpose of classification and labelling. The Committee agreed with the DS conclusion and reasoning on the substance being not rapidly degradable for classification purposes.

BCF values were reported as 507 ± 87 L/kg (at high dose) to 538 ± 65 L/kg (at low dose) wet weight. Normalising the BCFs to 5 % lipid content increased the values to 843 to 886 L/kg wet weight, i.e. greater than the trigger value of 500 for potentially bioaccumulative substances. RAC agreed with the conclusion that octhilinone has a potential to bioaccumulate. The Cefic expert disagreed with this conclusion stating that the substance properties indicate much lower potential to bioccumulate. It undergoes rapid biodegradation, and the uncorrected BCF of 507 ± 87 L/kg is really on the edge of the 500 value.
Regarding acute aquatic toxicity the Committee agreed that E_rC_{50} 48-h value of 0.00129 mg/L from *Navicula pelliculosa* study fulfils the criteria for Aquatic Acute 1, i.e. < 1 mg/L. The value is in the range of 0.001 < L(E)C_{50} ≤ 0.01, thus giving an M-factor of 100.
Concerning chronic aquatic toxicity the Committee agreed that the E_rC_{10} 48-h value of 0.000224 mg/L for *Navicula pelliculosa* fulfils the criteria for Aquatic Chronic 1, i.e. ≤ 0.1 mg/L for a non-rapidly degradable substance. The value is in the range 0.0001 < NOEC ≤ 0.001, thus giving an M-factor of 100.

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. 3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that fluxapyroxad is an active substance in plant protection products used as a fungicide. It is a new active substance and has no existing entry in Annex VI to the CLP Regulation.

The legal deadline for the adoption of an opinion is 13 June 2019.

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), skin corrosion / irritation, serious eye damage / eye irritation, germ cell mutagenicity, STOT SE, hazardous to ozone layer and classification for hazards to aquatic environment - Aquatic Acute 1; H400 and Aquatic Chronic 1; H410 with M-factors of 1.

The Committee discussed skin sensitisation of fluxapyroxad and the validity of the GLP-compliant GPMT study used in the CLH report. After a more detailed examination, RAC agreed that the study is valid and sufficient for concluding on skin sensitisation potential of the substance. RAC agreed that no classification for skin sensitisation is warranted.

As regards repeated dose toxicity, RAC discussed toxicity to the liver and the thyroid and concluded that the effects observed in the rat studies (increased organ weight, hepatocellular hypertrophy, thyroid follicular cell hypertrophy/ hyperplasia and increased secretory depletion) were considered to be mostly adaptive, with no significant impact on health at dose levels relevant for classification.

Carcinogenicity was discussed based on two GLP compliant, long-term oral toxicity/carcinogenicity studies in rats and mice and several mechanistic studies conducted to further investigate the MoA of the compound. One RAC Member questioned the robustness of the data pointing to the fact that in an *in vitro* study, human hepatocytes from only two donors were used (with one compromised). The IND expert explained the purpose of that study, i.e. to confirm the CAR-PXR mediated MoA by demonstrating the absence of hepatocellular proliferation in human hepatocytes. Other RAC members noted that the database of mechanistic data of fluxapyroxad was adequate and the conclusions were not based solely on human cells *in vitro* data. Fluxapyroxad induced liver and thyroid tumours in rats (more pronounced in male rats but with clear dose response in both sexes) but not in mice. Based on the fact that the CAR mediated MoA is highly plausible and that this non-genotoxic mode of action has been considered of limited relevance to humans, RAC concluded on no classification for carcinogenicity.

As to toxicity to reproduction, RAC discussed the effects in rats and rabbits; namely the post-implantation loss in rabbits, decreased bodyweight gain and significant post-natal growth delay in rats. No effects on development or fertility in adulthood have been observed. The Committee considered these effects in detail, noting that the reduced postnatal bodyweight gain was observed in two generations where milk is the only nutrition source, which justifies that they are caused by lactation. The IND expert was of the view that the weight difference of pups at PND1 were of the same magnitude of maternal weight differences at the end of gestation and thus not entirely related to lactation effects. Furthermore, from about PND10 pups start to consume medicated diet and are exposed directly. RAC additionally, took into account physico-chemical characteristics of the substance, severity of the effects with nearly 20% bodyweight gain reduction in the absence of maternal toxicity and before the exposure to other external effects and with significant dose-response. Following an extensive discussion, in which some members questioned whether there was insufficient evidence to classify RAC concurred that this information was sufficient for the classification for lactation even without evidence of transfer of the compound to the breast milk. RAC classified fluxapyroxad as a substance that may cause harm to breast-fed children (Lact., H362).

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

17. oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting. The Chairman reported that oxathiapiprolin (ISO) is a fungicide used in agriculture and viticulture. It is a new active substance and has no existing entry in Annex VI to the CLP Regulation. Legal deadline for the adoption of an opinion is 16 August 2019. The DS (IE) proposes to classify oxathiapiprolin as 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), STOT SE, skin/eye irritation, respiratory sensitisation, skin sensitisation, STOT RE and germ cell mutagenicity.

RAC concluded that no classification for carcinogenicity is warranted for oxathiapiprolin, considering that all the neoplastic findings occurred in one sex in one species at very low incidences (within the HCD range) and only at the high dose. In addition, oxathiapiprolin was not shown to be genotoxic and there was no indication of associated pre-neoplastic lesions.

RAC concluded that no classification is warranted for effects on fertility considering that the main relevant finding, delayed sexual maturity as indicated by the delay in preputial separation, was observed in males only, there was large variability in this delay in control animals and inconsistency in the effects between studies. RAC agreed that no clear effects on development were observed and effects seen during lactation were not considered sufficient to warrant classification. In addition, no appropriate toxicokinetic data was available to provide additional support for classification for lactation.

RAC agreed to classify oxathiapiprolin as Aquatic Chronic 1; H410 (M=1) as the lowest value reported was a NOEC of 0.058 mg/L for the crustacean *Americamysis bahia* and the substance is considered not to be rapidly degradable. Concerning acute aquatic toxicity, one RAC member noted that acute effects occur only above the water solubility limit, and therefore acute aquatic classification may not be warranted. RAC also discussed the lack of consistency between acute and chronic tests for *Daphnia magna*, as well as the apparent inconsistency exhibited by the different aquatic invertebrate species in terms of acute toxicity. RAC agreed that considering all uncertainties and also due the fact that the effects were seen in concentrations above the water solubility limit, no aquatic acute classification is warranted.

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

18. m-bis(2,3-epoxypropoxy)benzene

The Chairman reported that resorcinol diglycidyl ether is an industrial chemical used as an epoxy resin and as a reactive diluent in the production of other epoxy resins.

The legal deadline for the adoption of an opinion is 28 August 2019.

The substance has an existing entry on Annex VI to the CLP Regulation for Acute Tox. 4*; H302, Acute Tox. 4*; H312 (=minimum classifications), Skin Irrit. 2; H315, Eye Irrit. 2; H319, Skin Sens. 1; H317, Muta. 2; H341, Carc. 2; H351 and as Aquatic Chronic 3; H412. Acute toxicity and carcinogenicity hazards were open for comments during the public consultation.

RAC agreed to the DS proposal to confirm the classification acute toxicity through oral route of exposure into category 4 and to classify the substance into category 3 for exposure through dermal route. Due to the poorly reported acute toxicity studies in the CLH report, RAC agreed to assign the converted acute toxicity estimate values (ATEs) of 500 mg/kg bw for oral and 300 mg/kg bw for dermal route of exposure. RAC also agreed to the DS proposal for no classification for acute inhalation toxicity.

RAC discussed the carcinogenic potential of the compound and noted the high tumorigenic potency and high incidence of tumours in two species (rats and mice) and in both sexes. The substance is mutagenic and thus the MoA is relevant to humans. In conclusion, the Committee agreed that category 1B for carcinogenicity is warranted based on increased incidence of benign and malignant neoplasms in two species (rats and mice) in both sexes in two NTP studies and on the genotoxic mechanism.

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

19. silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that silthiofam is a selective seed applied fungicide known to affect only one pathogen viz. *Gaeumannomyces graminis var tritici* and is used to protect cereal crops. 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 24 August 2019.

The DS (IE) proposed classification as Repr. 2; H361d, STOT RE 2; H373 and Aquatic Chronic 2; H411.

RAC agreed the following via the fast-track procedure, i.e. with scrutiny but without plenary debate: no classification for acute toxicity (oral, inhalation and dermal routes of exposure), STOT SE, skin corrosion / irritation, serious eye damage / irritation, skin sensitisation, germ cell mutagenicity, and classification as Aquatic Chronic 2; H411.

RAC agreed that no classification was warranted for the physical hazards. The proposal for classification as STOT RE 2 was based on mortality in pregnant rabbits. In the range-finding study on rabbits at 100 mg/kg bw/d and 150 mg/kg bw/d, the mortality rates were 4/6 and 5/6, respectively. In addition there were clinical signs which indicated general toxicity, including hypoactivity/lethargy, decreased defecation, discoloured faeces and/or staining of body surfaces/cage bedding, body weight losses and reduced food consumption, red fluid contents in the urinary bladder, dark red contents in the stomach, caecum and/or trachea. In the main study on rabbits at 60 mg/kg bw/d no deaths were observed. The possibility that the observed effects were rabbit-specific gastro-intestinal effects with no relevance to humans was raised. Some members considered the mortality findings to be secondary to gastro-intestinal tract (GIT) disturbances only seen at the high dose and with a steep dose -response relationship, and that if it was decided to classify for STOT RE, the GIT should be noted as a target organ. There was no increase in mortality in repeated dose toxicity studies conducted in mice or rats at doses at or below the guidance values, but increased mortality was seen in dogs in repeated dose toxicity studies (along with clinical signs indicating general toxicity) at dose levels relevant for classification for STOT RE. It was also pointed out that unlike in some other proposals based on mortality in pregnant rabbits, in this case there was no evidence that the substance was irritating and mortality was seen in 2 species. Some RAC members noted the potential relevance to humans of findings in dogs. The evidence for specific inhibition of the adenine nucleotide transporter (ANT) activity by silthiofam could explain the toxicity. RAC also agreed that in this case a specific target organ could not be identified. The Committee agreed to classify the substance as STOT RE 2; H373.

The DS had proposed not to classify the substance for carcinogenicity. The Committee discussed the significance of liver tumours observed in rats and mice. In rats, progression to malignancy was observed, and in mice a positive trend in the incidence of liver tumours was observed, although the incidences were outside the historical control range. In addition, no mode of action had been investigated for the mouse tumours. The rapporteurs also reported that the findings were not statistically significant using pairwise comparisons and there was no effect on survival. The liver tumours were observed in only one sex in each species. Pre-neoplastic lesions and/or cytotoxicity was observed in both males and females but did not progress to tumours in either sex. The Committee noted that the mode of action was likely to be CAR-mediated and of low human relevance, and that the substance is not genotoxic. Thyroid tumours showed progression to malignancy, were slightly outside the historical control data range, and the mode of action was not sufficiently investigated to support non-relevance to humans. However, these appeared in one species and one sex only, and only at high doses. In addition, they were not statistically

significant, and no pre-neoplastic findings were observed. Although liver tumours were observed in rats and mice, the mechanism appeared to be different in each species. The historical control data ranges quoted by the industry expert from the report on the chronic toxicity/oncogenicity study in rats were up to 18%, 8% and 2% for the liver adenomas, thyroid adenomas and thyroid carcinomas, respectively. The absence of hypertrophy in rats was noted. Due to data gaps, in the investigations into the relevance of the findings to humans, as well as the equivocal carcinogenicity study results, although modes of action other than CAR could not be excluded, RAC agreed on balance that 'no classification' was warranted for carcinogenicity.

During the discussion on reproductive toxicity the Committee agreed that no effects on fertility were observed in the available two-generation reproductive toxicity study in rats. Findings from the developmental toxicity studies from rats and rabbits were discussed. The rapporteurs presented the following findings from the studies as relevant for classification: dead foetuses which are rare findings that are not present in the historical data range, and cleft palate, which was observed in only 2 litters. Maternal toxicity was not considered to explain these rare events. The arguments against classification, as presented by the rapporteurs, were the following: foetal weight and 7th cervical ribs due to maternal toxicity, cluster of cleft palates in one litter and one foetus in the other litter were inside the historical control data range, and dead foetuses are of concern but only occurred in presence of marked maternal toxicity and severe delay in foetal development. Six RAC members expressed the view that the substance should not be classified for developmental effects due to the observed maternal toxicity. The Committee agreed 'no classification' for the reproductive effects. The rapporteurs also presented the potential reprotoxic effects on or via lactation. Based on the Log K_{ow} of the substance, the possibility accumulation in milk cannot be excluded. Nevertheless, the reduced mean pup weight may also coincide with the beginning of ingestion of the chow containing the test material. The Committee agreed that the findings cannot be attributed to the effects on or via lactation, therefore the Committee agreed on 'no classification' for these effects.

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

20. N-methoxy-N-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen

The Chairman welcomed the expert accompanying the ECPA stakeholder attending the meeting and reported that it is an active substance in plant protection products used as a fungicide. It has no existing entry in Annex VI to the CLP Regulation. The DS (FR) proposes to classify as Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410 (M=1). Legal deadline for the adoption of an opinion is 29 August 2019. Pydiflumetofen is being assessed in parallel by EFSA.

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

Following a discussion on the low solubility of the substance and sufficient contact with skin, RAC considered that no classification is warranted for skin irritation based on the negative results of a primary dermal irritation study with rabbits.

Regarding carcinogenicity, RAC noted that pydiflumetofen induced liver tumours in mice and thyroid tumours in rats which raised concern for its carcinogenic potential. RAC discussed thyroid tumours found in female rats which occurred at the upper bound limit of the HCD range and noted that thyroid tumours were not observed in the mice study. Slight increase in thyroid tumours in female rats and follicular cell hyperplasia observed within historical control range at

the highest dose are considered possibly related to administration of pydiflumetofen but not sufficient to warrant classification. In addition, the adequacy of the dose selection was questioned. RAC noted that increased incidence of hepatocellular carcinomas and adenomas was observed in male mice. No neoplastic findings were observed in female mice and no increases in liver tumours were noted in the rat lifetime study. However, the key event proliferation is not observed in primary human hepatocytes which questions human relevance. It was noted that there was only one donor and species specificity cannot be concluded. Mode of action studies were mainly directed at Constitutive Androstane Receptor (CAR) activation and indicate that the liver tumours may be considered not relevant to humans, but there is not sufficient evidence for excluding other possible MoAs and further assessment of the studies is anticipated. In contrast to the DS proposal, RAC agreed provisionally that category 2 could be warranted, but that further discussion is needed.

RAC assessed a 2-generation reproductive toxicity study in rats and PNDT in rats and rabbits. In the 2-gen study with rats, delays in maturation by 3 days were observed at the top dose in both males and females. It was noted that if a delay is more than 2 days, it should be considered as treatment related, unless it is seen as a delay in general growth. RAC noted that effects are seen in both sexes, outside the HCD and cannot be explained by bodyweight change only, therefore effects are considered treatment related and category 2 for fertility would be justified in contrast to the DS proposal, but that a second discussion is needed. In addition, there were RAC members who indicated that the study has shortcomings due to low dosing and that half of the pups died in all F2 groups.

Regarding development, the reported effects remained within the HCD but RAC pointed out that the dosing might have been too low, especially in the rat study and therefore no classification is justified due to inconclusive data. Further to these provisional agreements, a second discussion is anticipated on reproductive toxicity effects.

This substance is scheduled for a second discussion, in particular carcinogenicity and adoption of the opinion at the forthcoming RAC-48 in March 2019.

21. Uvinul A Plus

The Chairman welcomed the expert accompanying the ECPA stakeholder observer and reported that Uvinul A Plus is used in cosmetics and personal care products as a UV filter.

The legal deadline for the adoption of an opinion is 19 April 2019.

The substance has an existing entry in Annex VI to the CLP Regulation for environmental hazards as Aquatic Chronic 4; H413.

RAC agreed that the substance is not rapidly degradable and has a low potential to bioaccumulate.

Based on the two new experimental *Daphnia magna* reproduction studies performed according to OECD TG 211, as well as all other available information showing no toxic effects to all three aquatic trophic levels up to the limit of water solubility, RAC concluded that Uvinul A Plus does not warrant classification for environmental hazards.

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

22. lead

The Chairman welcomed the expert 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 a second plenary discussion. The DS (DK) proposes to classify lead metal (massive and powder forms) as hazardous to the aquatic environment with Aquatic Acute 1 and Chronic 1; both with separate M-factors of 10. The legal deadline for the adoption of an opinion is 6 February 2019.

The Rapporteur introduced the case by summarising the proposal from the DS (DK) and presenting a summary of the discussions at and follow-up actions since the previous plenary. Based on the outcome of discussions and the further clarifications and background information submitted by the DS and Eurometaux following RAC-46[5], the Rapporteurs identified a number of key issues for continued discussion at this plenary.

With respect to the key issue on statistical treatment of test data and the consideration of the large data set on lead, the Rapporteur reconfirmed his support for the DS proposal to use the lowest value instead of the geometric mean for derivation of ERVs. In addition, the Rapporteur agreed with the DS proposal for not grouping the available data into pH bands, as no correlation has been established between pH and toxicity for the chronic most sensitive species.

By looking into the available dataset for *Ceriodaphnia dubia*, which is one of the two chronic most sensitive species, several RAC members considered the lowest value more suitable than the geometric mean in this case, referring to the varying test conditions. To the contrary, one member, referring to the large dataset for this species (39 EC10s for the endpoint 'reproduction'), stressed that the use of the lowest value with the amount of data available should be carefully reflected and was in favour of the use of the geometric mean instead. One further aspect with respect to the variability of test conditions is the lack of clarity where the boundaries lie as there is no guidance supporting the decision on how variable test conditions should be before the geometric mean approach can be ignored.

The expert accompanying Eurometaux emphasized the application of weight of the evidence approach (WoE), referring to the CLP guidance which states that in case of data-rich substances selection of the lowest value should not be the default. Furthermore, the industry expert clarified that there is no concern on the biotic ligand model (BLM) for lead and given that it has been advocated in the CLP guidance, it should be applied.

However, as there were no clear trends in the data driven by the water quality, the need to normalise the data was questioned. The industry expert explained the lack of correlation between pH and toxicity, as presented in the CLH proposal, being a result of using non-normalised data without considering external and biological variability before calculating correlation coefficients. In case the data were normalised, it would result in correlation coefficients of 0.8 for the *C. dubia* dataset.

In response, the DS reiterated his concerns as regards the validity of the BLMs, in view of giving different results depending on the normalisation model used. Furthermore, according to the DS, as in this case no reduction in variability is seen in the normalised dataset, the usefulness of normalisation to compare the data is questionable.

The Chairman summarised the discussion by concluding that RAC does not see the reason to normalise the data as there is no clear trend seen in the three water quality parameters taken into account in every single ecotoxicity test which would justify normalisation or banding according to pH. What is to be decided by RAC is whether the large dataset available on *C.dubia* is considered sufficiently independent to allow using the geometric mean or the lowest value. Following further clarifications from the industry expert confirming that the studies were

[5] Minutes of the 46th Meeting of RAC https://echa.europa.eu/documents/10162/22838445/RAC46_Minutes_.pdf/60215f27-72c4-6feb-d245-0cceb5340e73

conducted separately, RAC decided to use the geometric mean for *C. dubia* as the most representative value in this case.

With regards to the data selection for chronic aquatic toxicity, the discussion from the previous plenary continued on the use of the most sensitive endpoint for the fish *Pimephales promelas* of 30d-NOEC of 0.9 µg/L (mortality; pH 6.7). The Rapporteurs reconsidered their view from the previous debate and agreed with the DS not to use this value for chronic ERV derivation due to uncertainties concerning the use of the organic buffer 3-(*N*-morpholino)propanesulfonic acid (MOPS) buffer, which could affect the ion regulation of fish at the gill surface and consequently influence the toxicity of lead to fish. RAC shared the DS and Rapporteurs' view to disregard the study, agreeing that the use of the MOPS buffer disqualified the study for use in classification in this specific case.

The next key issue referred to the use of non-standard species for derivation of the chronic ERV, particularly the use of the EC_{10} of 1.7 µg/L (growth; pH 7.3) from a study conducted with larvae of the snail *Lymnaea stagnalis*. The representative from Eurometaux disagreed with using larval snail data because the criteria to use these data for CLP purposes are not met. It was argued that the freshwater snail *Lymnaea stagnalis* has been demonstrated to be sensitive to metals, including lead, in various laboratory studies using larval stages as test organisms whereby the most sensitive endpoint consistently is growth. In the case of Pb, industry agreed that a value of 1.7 µg Pb/L for the endpoint growth rate at pH 7.3 was reported by Parametrix (2007). Industry had stated during RAC-46 discussions that this study was not conducted using a standardised test protocol for this species and the finding does not correspond with field experience for the species as it occurs widely in surface waters in the EU including relatively polluted waters. Referring to RAC-46 discussions and the written follow-up by industry, industry noted that there are now recent additional studies showing strong impacts of diet type and quality on the sensitivity of this species. Low nutrient diets have been shown to increase the sensitivity to toxicants. In line with other metal cases industry is not in favor of using snail data for hazard classification given it is not a standard species. Industry expressed its opinion to consistently use standard species for hazard classification of data rich substances in order for maintaining a level playing field. More importantly, no standard OECD or EU test protocol for larval testing of *L. stagnalis* exists meaning that the conditions of the test as used by Parametrix and others, were never validated. Confusion may have been caused by the existence of a relatively recent OECD (2016) test protocol providing a method for testing the reproduction of the adult snail. The growth study with a larval stage is outside the boundaries of this test protocol because of differences in the physiology and behavior of life stages. Industry therefore states that the minimal data quality was not guaranteed and this data point should be rejected.

On the contrary, the Rapporteurs consider the study as acceptable and argue that the existing OECD TG 243 (focusing on the reproduction of *L. stagnalis*) allows to use individual growth of the reproducing snails and the number of eggs produced per snail as additional test endpoints. Therefore, the Rapporteurs conclude this being a supporting argument for acceptance of this study for chronic ERV derivation. This view was supported by RAC, considering the study as reliable and relevant, as it was conducted using sensitive life stages and the species used reflects the appropriate trophic level. In support to the Rapporteurs view, the DS intervened that despite not being conducted according to the existing OECD TG it has been rated as Klimisch 1 in the REACH registration dossier and was used for the PNEC derivation and employed in the Species Sensitivity Distribution (SSD) therefore, it is not clear why this value could not be used for classification. The industry expert clarified that the assigned Klimisch score of 1 was human error and the IUCLID file was only recently updated accordingly. RAC concluded that the study is usable and valid for the purposes of classification, and adds a mollusc to the usual fish crustacean and algae. Overall, the study was conducted close to an established standardised

test guideline and should be accepted.

The Chairman introduced the next key issue for discussion regarding one single or a split classification for lead. He outlined two aspects to be considered, one is the use of relevant data covering both massive and powder forms. Under CLP the available information has to be used by applying a WoE approach taking into consideration all relevant information available. The second aspect is that there is guidance on how to look at entries for metals in Annex VI. Focus needs to be on both aspects. The differences in information available on the environmental classification of previously reviewed metals cases adds some further difficulty.

One RAC member emphasised that RAC needs to be mindful of past precedents and mentioned *e.g.* the split classification of nickel which should be taken into account. Furthermore, the need to avoid multiple entries for a metal was mentioned. On the other hand Transformation/Dissolution protocol (T/Dp) test data is available and should be taken into account when determining classification. Overall, RAC expressed diverging views on this topic and various arguments for one or the other.

The DS stressed that according to the CLP guidance a split classification between massive and powder forms is an exception and referred to this with existing Annex VI entries for certain metals supporting this view. Splitting the classification has in earlier cases been either based on differences in physico-chemical properties (such as for aluminium or magnesium) or producing the powder form via a "special process", which was the case for nickel (Nickel Carbonyl process). None of these aspects are applicable to lead and therefore a split classification is not considered justified according to the DS.

The Eurometaux representative emphasised that consistency with previous cases, relevance of arguments and the boundaries of the CLP system are to be taken into account in the overall decision making. In this respect he stressed that releases from articles (e.g. lead shot) should not be considered, since articles are not part of the CLP system. He further clarified that there are no lead powder producers in the EU, so it is difficult to judge on the production technique of lead powder in the EU. Apart from this, it was explained that normally all metal powders are manufactured using the same atomisation process and, by referring to the examples given by the DS, the split in classification based on different physico-chemical properties (such as pyrophoric properties) was decided independently from and before the environmental classification. In addition, for the existing metal entries the massive and powder forms were assessed separately (*i.e.* separate T/Dp data were looked at), based on which the classification decision was taken – either to apply the same classification (*e.g.* cadmium), due to the high release rates for both forms resulting in a classification in the most severe category or, both forms did not show any relevant release and were thus not classifiable (*e.g.* aluminium). Nickel, zinc and copper forms were assessed separately and the classification was split because of different dissolution rates in the 7 and 28 days tests between massive and powder forms. For lead the same applies with one difference, that lead is more malleable which will not allow 'fines' to be produced when *e.g.* drilling. In conclusion, there is no reason to neglect the T/Dp data for the massive and as a consequence there is no justification to not split the classification.

The Chairman referred to two main aspects which would need to be looked at in coming to a conclusion. Firstly, whether the manufacture of lead powder can be considered as a special process. Secondly, whether powder forms are produced spontaneously from the massive metal.

Several RAC members agreed that the classification should be based on the intrinsic properties of lead regardless of the form as there is no difference in the biological impact of the two forms. Furthermore, no distinction should be made based on differences in the dissolution rates between the two forms. A majority of RAC members showed a preference for a single classification of lead and did not consider the conditions for an exception as outlined in the CLP

guidance as being met. In this respect, the Rapporteurs summed up that the data on the powder form is suitable to classify the massive form, noting that the criteria for distinct classifications are not fulfilled as the two forms neither exhibit different crystalline structures, nor is the condition for exemption fulfilled because powder forms can be generated from the massive (albeit through a process of melting) and the manufacture of powder is not considered to be a special process. It was noted that the term 'special process' is not defined and not really helpful in this regard when interpreting the guidance. The assessment to be made is on the smallest representative particle size and for this reason RAC is of the opinion that the available T/Dp data on the powder form are sufficient to classify the massive form.

The representative from Eurometaux clarified that the intention of the GHS and CLP guidance was: 1) to prevent cases where the classification is based on the massive form, while powder forms are produced by milling or grinding massive forms or significant powder releases occurred during 'normal handling and uses' but 2) also to allow for a separate assessment of different forms, such as amorphous and crystalline forms if needed. It was furthermore emphasised that while abrasion is only possible in strong contact of a massive form this would not lead to a level that could have an effect on the environment.

The Chairman summarised that there is a preference to apply one single classification. However, in this case the view of some RAC members was strongly in favour of a distinct classification for the massive and powder forms and that this should be clearly reflected in the opinion. Therefore, for reference, the opinion will reflect what the outcome of the situation would have been, if the Committee had decided on two classifications by using the TD/p data for the massive form (1mm) to determine a dual classification, clearly indicating that this was not the preference of the majority of the Committee but there were some members supporting it. The Eurometaux representative appreciated this approach and confirmed it is a transparent way of opinion-forming.

The Chairman thanked the Rapporteurs 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

The Chairman introduced the REACH Restrictions part of the agenda with a presentation on the background and legal requirements for conformity checks, informing RAC that a simpler and more effective approach is required to assessing and agreeing the conformity of incoming restriction dossiers. The Commission has requested ECHA to prepare a large group of restrictions in 2019 and 2020 and the intention of the Agency is to breathe new energy into the restriction process. In the Restriction Task Force (2018)[6] and since then, Member States made clear that the bar for preparing a restriction in an efficient manner has been set too high. To meet this challenge, RAC and SEAC will need to review their approach to evaluating restriction dossiers and conformity is a key aspect of this.

6 https://echa.europa.eu/documents/10162/13641/report_task_force_on_restriction_efficiency_en.pdf

He informed that in the view of the Secretariat, conformity should be limited to a check of the legal requirements, i.e. whether the components defined by Annex XV are present or not and that this should be separated from the later evaluation of the dossier. A restriction should be possible to build with the contents of the relevant registration dossiers at its core. Should information in the registration dossiers be missing or deemed inadequate, the Public Consultation (PC) is the place to request this. In turn, should the PC not fill the gaps seen as critical to the restriction, then the preferred course of action is to: "*ensure that …[RAC/SEAC] opinions indicate when scientific data do not permit a complete evaluation…..*". RAC and SEAC outline the role and importance of the missing information, describing clearly the uncertainties that this creates. They then describe the steps considered necessary to recover/generate that information and suggest a timeline. They advise the Commission accordingly, allowing the latter to apply the Precautionary Principle as appropriate. The Chairman concluded that this uses REACH as it was intended and could greatly shorten the time taken to agree a restriction.

In the discussion, many members agreed that a simpler approach to conformity and the treatment of missing information as an uncertainty, rather than a reason to stop or slow down evaluation of the dossier, would be helpful. Some members questioned where the balance lay and pointed out that missing information could in certain circumstances be insurmountable and stall a dossier, or even lead to the restriction not being supported. It was noted that the question as to whether restriction was the most appropriate form of EU-wide action should not open up a discussion on risk management options as part of conformity but should come later, as part of the evaluation of the dossier. The secretariat noted that some changes to the format for reporting conformity might be needed to align with the new approach.

RAC agreed with the Chairmen to implement the new approach to conformity with immediate effect.

1) N,N-dimethylformamide

The Chairman welcomed the Dossier Submitter representatives from Italy and the RAC Rapporteurs. He informed the participants that the restriction dossier had been submitted by Italy on 5 October 2018.

The representative of the Dossier Submitter provided an introductory presentation on the dossier. The proposed restriction aims to restrict the uses of the substance on its own or in mixtures in a concentration equal or greater than 0.3 %. DMF is manufactured in the EU, and involved in the production of fine chemicals, pharmaceuticals, polymers, textiles, non-metallic products, and perfumes/fragrances. It is also used in the petrochemical industry and as a laboratory agent. There is no consumer use of DMF. The Dossier Submitter proposes the following text for the conditions of restriction: "Manufacturers, importers and downstream users of the substance on its own or in mixtures in a concentration equal or greater than 0.3 % shall use in their chemical safety assessment and safety data sheets by [xx.yy.zzzz] a worker based harmonised Derived No Effect Level (DNEL) value for long-term inhalation exposure of 3.2 mg/m^3 and a worker based harmonised DNEL for long-term DNEL dermal exposure of 0.79 mg/kg bw/day."

The RAC members made comments on the scope of the restriction proposal and completeness of the information in the Annex XV restriction dossier.

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 requirements of Annex XV of the REACH Regulation. 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 December 2018.

2) Five cobalt salts

The Chairman welcomed the Dossier Submitter's representatives from ECHA and an industry expert, accompanying the regular Eurometaux stakeholder observer. He informed the participants that the restriction dossier had been submitted in October 2018.

The Dossier Submitter's representative provided an introductory presentation on the dossier. She explained that the proposal is intended to restrict the placing on the market, manufacture and use of the cobalt salts as substances on their own or in mixtures in a concentration equal or above 0.01% by weight in industrial and professional applications. The five cobalt salts (cobalt sulphate, cobalt dichloride, cobalt dinitrate, cobalt carbonate and cobalt di(acetate)) are manufactured and used in a variety of sectors within the European Economic Area, including the manufacture of chemicals, catalysts, battery production, surface treatment, fermentation processes, health applications, feed grade materials, biogas, etc. The cobalt salts are classified as Carc. 1B (inhalation), Muta. 2, Repr. 1B and skin and respiratory sensitisers. She also reminded the Committee that in 2016, RAC had agreed that the cobalt salts should be considered as genotoxic carcinogens with a non-threshold mode of action and had endorsed a dose-response relationship for these substances.

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 not in conformity – due to the omissions in:

- the information on uses of the substances
- the resulting emissions or exposure
- the effectiveness practicality and monitorability of the proposed restriction against other RMOs.

Several RAC members expressed the view that the omissions identified by the RAC Rapporteurs are relevant for the opinion development, but they should not be the reasons for considering the dossier not to be in conformity.

The industry observer made points relating to the dose-response relationship and technical feasibility and welcomed a discussion on these topics at the upcoming RAC opinion development discussions.

The Committee then agreed that the dossier conforms to the requirements of Annex XV. In addition, the Rapporteurs presented their findings on the key issues of the restriction proposal. The Chairman informed the Committee that the public consultation on this restriction proposal will be launched in December 2018 (provided that also SEAC considered it in conformity at this meeting).

b) Opinion development

1) Plastic and rubber granulates containing PAHs

The Chairman welcomed the Dossier Submitters representatives from the Netherlands (via WebEx) 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 proposed restriction 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.

The Rapporteurs presented and RAC discussed the first draft opinion. RAC agreed on identified hazard and concluded that PAHs induce carcinogenic effects in animals after oral, dermal and inhalative exposure. For mutagenicity / carcinogenicity of benzo[a]pyrene and other PAHs RAC could not identify a threshold. RAC concluded that there is uncertainty in the dose response and identified the need to better incorporate evidence from available human epidemiological studies noting the association of increased lung cancer with occupational airborne PAH exposure. Other identified uncertainties were related to the type of mixtures discussed in the available studies, compared to the different mixtures to be assessed in the restriction proposal. Furthermore, concentrations of eight PAHs in material for synthetic turf pitches in loose form on playground and sport applications should be as low as reasonably achievable. RAC also noted that the issue of possible leukaemia risks would still have to be addressed.

In addition, RAC agreed on the proposed exposure assessment. Based on information on exposure, RAC agreed on the risk characterisation in principle and a concentration limit of 20 mg/kg, which would not be risk-based but rather a measure aimed at avoiding very high PAH concentrations, i.e. preventative measure and acknowledging the uncertainties in the assumptions.

Finally, RAC agreed that a restriction under REACH is the most appropriate EU wide measure, noting the uncertainty on the end of waste status of the granules and mulches.

The Rapporteurs were requested to take the discussion of RAC-47 into account in the second draft RAC opinion. The Chairman concluded that, since RAC had generally supported the restriction and had made good progress in terms of agreeing on hazard and exposure related issues, including on the limit value, the dossier will not go for discussion in the next RAC plenary (March 2019) but will be on the agenda for agreement in the June 2019 meeting (i.e. after the end of the Public Consultation).

2) 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. 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 revised fourth draft opinion, which was modified following the RAC written commenting round. RAC then discussed the Rapporteurs' proposal for the remaining issues in the draft opinion, mainly related to concentration limits for some impurities, derogation for two pigments, scope and effectiveness as well as practicality and monitorability of the restriction proposal.

RAC agreed the remaining concentration limits for heavy metal impurities (of 0.00005% for organic tin, cadmium, chromium VI, cobalt, mercury, antimony and of 0.0002% for selenium). Furthermore, RAC agreed to derogate substances that are gases at standard temperature and pressure as they are not expected to be found in tattoo inks due to their physical state.

However, RAC did not agree to a proposed derogation of two phthalocyanine colourants (Pigment Green 7 and Pigment Blue 15:3) due to the limited information available on hazards and risks. The issue will be further investigated at the upcoming public consultation on the SEAC draft opinion which will be launched on 12 December 2018. The derogation on the remaining 19 pigments was not supported at RAC-46 on similar grounds.

RAC agreed to additional conditions on the use of colourants in Annex IV of Cosmetic Products Regulation and supported a transitional period of one year. In addition, RAC supported the requirement for tattoo artists/practitioners to ensure that non-compliant inks are not used for tattooing procedures as well as clear definitions of tattoo and permanent make-up practices, which are a prerequisite for enforcement.

Finally, RAC agreed that the proposed restriction is effective in reducing the identified risk as technically feasible and less hazardous alternatives are likely to be available, despite stated uncertainties. RAC also agreed that the proposed restriction is implementable, enforceable, manageable and monitorable.

RAC adopted its opinion on the restriction proposal on tattoo inks 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 five new applications for authorisation were received during the November 2018 submission window. Four of them are on uses of chromium trioxide for sanitary sector products. The fifth new application is for the use of chromium trioxide for passivation and coating of tin-plated steel. Key issues in the new applications for authorisation will be discussed at RAC-48 plenary meeting in March 2018.

The Secretariat also informed about high numbers of applications for authorisation expected to be received during 2019 and the beginning of 2020 amounting to ca. 120 applications for authorisation on more than 200 uses of chromium (VI) substances, octyl- and nonylphenol ethoxylates, coal tar pitch, high temperature, and trichloroethylene.

The Secretariat also informed the Committee that the ECHA-Commission workshop on applications for authorisation was held on 15-16 November 2018 in Brussels. Representatives of DG GROW, DG Environment and ECHA participated in the workshop. Objectives of the event were to analyse the nature and perception of the issues and to propose actions for improvement. Based on the Secretariat's preliminary conclusions, the following actions may emerge: the use of 'standardised' phrases for certain parts of the opinions (e.g. for the additional conditions and conclusions), identification of alternative suppliers who can comment during the public consultations, review of formats and guides where relevant, organisation with stakeholders of a lessons learnt exercise to improve the process, and explore how to deal with elements that may require 'political judgement'.

b) Committee Procedure for fast track agreement opinions on application for authorisation

The Secretariat presented a meeting document RAC/47/2018/04 "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)". The document had been updated following the discussion at the RAC-46 plenary and a written consultation on the draft document prior to this plenary meeting.

Two RAC members who took the floor supported the draft document in general. One of them stressed the importance of when a proposal to A-list the draft opinion will first be made. The Committee agreed on the document by consensus. The Secretariat will publish the document on the ECHA website.

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

No items for agreement under this agenda item.

b) Agreement on Draft Opinions

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, well defined scope and covers one use in a closed process (one ECS, seven WCS) at two sites: in Poland and Germany. 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 re-calculated by RAC, excess cancer risk for combined exposure from the combined exposure resulting from of WCSs 2, 3, 4, 5 and 6 is 6.24×10^{-4} exposed workers. For humans via the environment excess lifetime risk for 70 years for exposure via inhalation is 1.21×10^{-4}, and 1.12×10^{-8} for oral exposure. Deadline for the agreement on the draft opinion is 6 June 2019. Following the responses to the rapporteurs' questions a trialogue had been held on 18 October 2018.

During the plenary discussion the RAC members requested further clarification regarding releases of the used substance to the environment. The rapporteur clarified that there are no

releases of Cr(VI) to the aquatic environment; wastewater from the process is collected and recycled, or disposed of in specialised facilities, and the residual chromium solution is recycled. During the discussion on the exposure assessment the uncertainties were identified in relation to use of modelled data for worker contributing scenarios (WCSs) with potential for exposure other than WCS 2 in the application. The uncertainties were described linked to the exposure estimation for the humans via the environment due to use of EUSES for modelling and uncertain representativeness of measured emissions' data. Both of these uncertainties lead to the recommendation for monitoring arrangements and recommendation to use measured data in the review report.

Following the plenary discussion the Committee agreed on the draft opinion as proposed by the rapporteur. RAC was of the opinion that the RMMs and OCs described in the application are appropriate and effective in limiting the risk to workers and the humans via the environment. Following the conclusions on the exposure assessment, RAC decided to recommend additional monitoring arrangements for the authorisation, i.e. the applicant shall continue at least annual exposure monitoring programmes of workers for chromium (VI) at both sites where the chromium trioxide is used. Those programmes shall be based on relevant standard methodologies or protocols, comprise both static and personal inhalation exposure sampling and be representative of the range of tasks undertaken where exposure to chromium is possible. In addition, the applicants shall continue monitoring programmes for chromium (VI) emissions to air at both sites, according to national requirements or as a minimum every two years; those programmes shall be based on relevant standard methodologies or protocols. RAC expected that the review report will be based on the monitoring results. RAC also agreed to give no advice to SEAC on the length of the review period.

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

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 future plant to be built in Hungary. The scope of the application is narrow and well defined, covering one use in a mostly closed process (one ECS, four WCSs one of which is not subject to Authorisation). The number of workers directly exposed is 25. A quantity of 15 tonnes per year is planned to be used and a 15-year review period has been requested.

For one WCS a qualitative exposure assessment was conducted, for the other WCSs the applicants based their assessment on modelled exposure data. As presented by applicants, the excess cancer risk for workers ranges from 1.6×10^{-8} to 1.0×10^{-7}, no combined exposure is foreseen. For indirect exposure of humans via the environment, only the local scale is considered relevant. Modelled concentration in the water and air compartments were provided and the excess cancer risk through inhalation is calculated at 1.0×10^{-6}, through oral route of exposure 7.4×10^{-8}. Following the responses to the rapporteurs' questions, a trialogue was held on 16 October 2018. The deadline for the agreement on the draft opinion is 26 May 2019.
Following the plenary discussion the Committee agreed on the draft opinion as proposed by the rapporteur. RAC is of the opinion that the RMMs and OCs described in the application will be appropriate and effective in limiting the risk to workers and the humans via the environment if implemented. Following the conclusions on the exposure assessment, RAC decided to recommend additional monitoring arrangements for the authorisation and the review report. RAC also agreed to give no advice to SEAC on the length of the review period.

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

c) Adoption of final opinions

1. CT_Hapoc_2 (1 use)

This is an upstream application for authorisation for the use of chromium trioxide in solid form and in aqueous solution of any composition to modify the properties of surfaces made of plastic, with or without current flow.

RAC agreed on the draft opinion at the RAC-44 plenary meeting in March 2018. On 1 August 2018, the Secretariat sent the draft opinion agreed by the two Committees to the applicant. On 10 September 2018, the applicant informed ECHA about their intention to comment on the draft opinion. The applicant's comments were received by the Secretariat on 8 October 2018.

RAC rapporteurs reviewed the applicant's comments. They agreed that all comments were addressed to SEAC and sought a recommendation for a long review period. Therefore, RAC adopted the final opinion by consensus with no changes made to the draft opinion.

10.3 Review reports

a) Discussion on key issues

1. RR1_TCE_Spolana

This is a review report. The original application for authorisation for the use of TCE by Spolana was evaluated by the Committees in 2014-2015. The Commission decided to grant the authorisation on 8 February 2017. The date of expiry of the review period is 21 April 2020. This remains an individual Downstream User's application covering only Spolana's use of trichloroethylene (TCE) as an extraction solvent in caprolactam production. The review period requested is 12 years. The tonnage has been reduced from 150t/y in the original application to 100t/y. Up to 100 workers are directly exposed.

The RAC rapporteur presented the general information and key issues related to the review report. In the review report the authorisation holder has submitted a revised CSR with an updated exposure assessment based on air monitoring and biomonitoring data generated in the last 2 years. Monitoring data are complemented with ART modelling on worker exposure assessment for infrequent tasks. The authorisation holder also reports several technical improvements concerning RMMs.

The authorisation holder seems to have addressed the conditions and monitoring arrangements as set out in the Commission's decision.

The RAC Rapporteur asked the Committee for comments and further suggestions, specifically regarding the authorisation holder's approach to use aggregated data from both air monitoring and biomonitoring for the exposure assessment. In principle RAC agreed with the authorisation holder's approach although pending on further clarifications from the authorisation holder as appropriate. RAC noted the improvement in the information submitted by the authorisation holder compared to the initial application.

The RAC rapporteur considered A-listing in case the authorisation holder will answer the requests by RAC thoroughly but since this is one of the first review reports RAC has to evaluate, RAC did not appreciate the proposal.

The RAC rapporteur will draft the opinion on the review report for discussion and agreement at the next RAC plenary meeting in March 2019.

b) Adoption of final opinions

a) RR1_DEHP_PP (2 uses)

This is a review report for the use of recycled PVC containing DEHP. The review report concerns the following to uses: 1) Formulation of recycled soft PVC containing DEHP in compounds and dry-blends, and 2) Industrial use of recycled soft PVC containing DEHP in polymer processing by calendering, extrusion, compression and injection moulding to produce the following PVC articles: (1) articles used outside of the interior space in applications in the field of construction, civil engineering, garden features such as ponds and roofing, agriculture (including horticulture) and industrials workplaces without potential for mouthing or prolonged contact with human skin or any contact with mucous membranes; (2) articles used in interior space in industrial and agricultural workplaces; or (3) footwear used in professional, industrial and/or agricultural workplaces.

RAC agreed on the draft opinions at the RAC-44 plenary meeting in March 2018. Applicant's comments were received by the Secretariat on 15 October 2018.

Following the comments from the authorisation holder on the frequency of air measurements in the conditions to the authorisation recommended by RAC in the draft opinion, RAC rapporteurs proposed that a frequency of at least once every two years is sufficient, unless further measurements are required according to EN 689:2018 based on the number and results of preceding air measurements. In addition, the rapporteurs proposed to specify that the measurements in any case shall be done 12 months before the latest application date of the review report.

The RAC members discussed potential implications of reference to the standard EN 689 in the opinion. A representative of the European Commission clarified that standards are recommendations, however, if mentioned in the opinion and later in the authorisation, if granted, its provisions will become legally binding. ECHA Secretariat noted that the authorisation holder had referred to the standard in the comments on the draft opinions.

RAC adopted the two opinions, as proposed by the rapporteurs, by consensus. The Secretariat will send the adopted opinions to the Commission, the Member States and the authorisation holder.

11. AOB

a) Proposed addendum to the RAC note on CTPHT

The Secretariat presented an addendum to the RAC note "Note on reference dose-response relationship for the carcinogenicity of pitch, coal tar, high temperature and on PBT and vPvB properties" agreed at the RAC-45 plenary meeting. As the dose-response relationship for dermal cancer is complex and appears to be overly conservative, the Secretariat proposed to add an Addendum of the Secretariat to the RAC note to clarify the issue and give further advice. The Addendum recommends that applicants either present a refined dose-response relationship or describe dermal cancer risk in a qualitative manner. Three RAC members expressed their support towards the Secretariat's proposal. The Secretariat also launched a written RAC consultation on the addendum. The Committee agreed on the Secretariat's proposal.

30 November 2018

Part II. Conclusions and action points

MAIN CONCLUSIONS & ACTION POINTS

RAC 47 **20 - 23 November 2018**
27 - 30 November 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/47/2018**) was adopted.	**SECR** to upload the adopted Agenda to the RAC CIRCABC and to the ECHA website as part of the RAC-47 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 46 action points, written procedures and other ECHA bodies **SECR** presented document **RAC/47/2018/01.**	**SECR** to upload the document to the CIRCABC non-confidential website.
b) RAC work plan for all processes	
c) General RAC-procedures The Secretariat presented document **RAC/47/2018/02,** a proposal for clarifying and strengthening the role of the Committee's rapporteurs in relation to Working Groups of RAC and their operation. RAC agreed with the general principles outlined in the document. The Secretariat presented document RAC/47/2018/03 on a proposed draft mandate for a Working Group on Applications for Authorisation. RAC discussed the proposal.	- **SECR** to revise the proposal for a draft mandate for an Authorisation WG, taking into account the discussions at RAC -47.

	SECR to arrange a written commenting round on the revised draft mandate prior to RAC-48 and to table it for RAC-48 for agreement.
d) INTERACT Project	
e) RAC Stakeholder Satisfaction Survey 2018	
6. Requests under Article 77 (3)(c)	
Setting M-factors for long-term aquatic hazard for the copper substances listed in Commission Regulation (EU) 2016/1179 Based on the mandate to RAC the Rapporteur presented the proposal for chronic M-factors for the ten copper compounds in question.	**Rapporteur** to revise the draft opinion in accordance with the discussion and provide it to the Secretariat. **SECR** to launch a short targeted public consultation on the draft opinion. **Rapporteur** to revise the draft opinion reflecting the comments provided during the public consultation. **SECR** to launch a written RAC consultation on the final draft followed by the adoption via a written procedure / at the March 2019 plenary meeting.
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

Please mention any ATE values for acute toxicity, together with the applicable route of exposure, where these were agreed by RAC through fast-tracking.

- potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]: physical hazards, acute toxicity, STOT SE, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity, environmental hazards
- bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]: physical hazards, acute toxicity, STOT SE, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity
- thiencarbazone-methyl (ISO): acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, STOT RE, germ cell mutagenicity, toxicity to reproduction, environmental hazards
- hexythiazox (ISO): environmental hazards

- flurochloridone (ISO): physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT RE, germ cell mutagenicity, carcinogenicity, environmental hazards
- iprovalicarb (ISO): physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity, toxicity to reproduction, STOT SE, environmental hazards
- 2,4-Dinitrophenol: acute oral toxicity
- dibenzo[def,p]chrysene: germ cell mutagenicity
- mancozeb (ISO): skin sensitisation, environmental hazards
- 4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT): physical hazards, acute dermal toxicity, germ cell mutagenicity, carcinogenicity
- pirimiphos-methyl (ISO): acute toxicity, germ cell mutagenicity, environmental hazards
- octhilinone (ISO); [OIT]: acute dermal toxicity, serious eye damage / eye irritation, STOT SE
- fluxapyroxad: physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, germ cell mutagenicity, environmental hazards, hazardous to ozone layer
- oxathiapiprolin (ISO): physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, respiratory or skin sensitisation, STOT RE, germ cell mutagenicity
- Silthiofam (ISO): acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT SE, germ cell mutagenicity, environmental hazards
- Pydiflumetofen: physical hazards, acute toxicity, STOT SE, serious eye damage/irritation, skin sensitisation, STOT RE, germ cell mutagenicity, environmental hazards.

B. Substances with hazard classes for agreement in plenary session

Please mention any ATE values for acute toxicity, together with the applicable route of exposure, where these were agreed by RAC, including those agreed through fast-tracking.

1. potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]
2. bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]
3. thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate
4. 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]
5. hexythiazox (ISO); trans-5-(4-chlorophenyl)-N-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide
6. flurochloridone (ISO); 3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one
7. iprovalicarb (ISO) isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate
8. 2,4-dinitrophenol

9. phosphine 10. dibenzo[def,p]chrysene 11. mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt 12. 2-(4-tert-butylbenzyl)propionaldehyde 13. 4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT) 14. pirimiphos-methyl (ISO) 15. octhilinone (ISO); 2-octyl-2H-isothiazol-3-one; [OIT] 16. 3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad 17. oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone 18. m-bis(2,3-epoxypropoxy)benzene 19. silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide 20. N-methoxy-N-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen 21. Uvinul A Plus 22. Lead	
1. potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Flam. Sol. 1; H228, Acute Tox. 3; H301, ATE(oral)=136mg/kg bw, Skin Irrit. 2; H315, Eye Dam. 1; H318, STOT RE 2; H373 (liver), 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.
2. bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Flam. Sol. 1; H228, Acute Tox. 4; H302, ATE(oral)=360mg/kg bw, Eye Dam. 1; H318, STOT RE 2; H373 (liver), Aquatic Acute 1; H400, M-factor=1, Aquatic Chronic 1; H410, M-factor=1]	**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. thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1*H*-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate	
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 = 1 000), Aquatic Chronic 1; H410 (M = 1 000)]	**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.
4. 2-ethylhexyl10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Retain: Repr. 1B; H360D Add: STOT RE 1; H372 (immune system), Aquatic Acute 1; H400, Aquatic Chronic 1; H410]	**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.
5. hexythiazox (ISO); trans-5-(4-chlorophenyl)-N-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	
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=1), Aquatic Chronic 1; H410 (M=1)]	**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. flurochloridone (ISO); 3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one	
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; H360DF, Acute Tox. 4, H302, ATE(oral) = 500 mg/kg, Skin Sens. 1, H317, 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.

7. iprovalicarb (ISO) isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate	
RAC adopted by consensus the opinion with a proposal for 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. **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. 2,4-dinitrophenol	
RAC adopted by consensus the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Acute Tox. 2; H300, ATE(oral)=30 mg/kg bw, Acute Tox. 3; H311, ATE(dermal)=300 mg/kg bw, STOT RE 1; H372]	**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 Rapporteur. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
9. Phosphine	
RAC adopted by consensus the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Add : Acute Tox. 1 ; H330 (inhalation: ATE=10 ppmV (gases))]]	**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.
10.dibenzo[def,p]chrysene	
RAC adopted by consensus the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Muta 2; H341; Carc. 1B; H350, SCL: 0,001%]	**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.
11. mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	
RAC agreed to classify mancozeb for selected hazards as indicated in Table 2 below. [Repr. 1B; H360D, Skin Sens. 1; H317, Aquatic Acute 1; H400 M=10, STOT RE 2; H373 (thyroid,	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **Rapporteur** to finalise the revision of mutagenicity and carcinogenicity part of

nervous system) and Aquatic Chronic 1; H410 M=10.] Discussion and agreement on mutagenicity and carcinogenicity are scheduled for RAC-48.	the draft opinion and to provide it to the SECR. **SECR** will table the case for discussion on mutagenicity and carcinogenicity hazards and adoption at RAC 48.
12. 2-(4-tert-butylbenzyl)propionaldehyde	
RAC agreed on the harmonised classification and labelling as indicated in Table 2 below. [Repr. 1B; H360Fd]	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR. **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.
13. 4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT)	
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, ATE = 0.16 mg/L (dust and mist), EUH071 Acute Tox. 4; H302 ATE = 567 mg/kg bw (oral route), Skin Corr. 1; H314, SCL = 0.025%, Eye Dam. 1; H318, , SCL = 0.025%, Skin Sens. 1A; H317, SCL = 0.0015% (15 ppm), 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.
14. pirimiphos-methyl (ISO)	
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, ATE oral = 1 414 mg/kg bw, STOT RE 1; H372 (nervous system), Aquatic Acute 1; H400, M-factor = 1 000, Aquatic Chronic 1; H410, M-factor = 1 000]	**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. octhilinone (ISO); 2-octyl-2*H*-isothiazol-3-one; [OIT]	
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; H301, ATE oral = 125 mg/kg bw,	**Rapporteurs** to revise the opinion in accordance with the discussion in RAC and to provide it to SECR.

Acute Tox. 2; H330, ATE inhalation = 0.27 mg/L (dust and mist), Acute Tox 3; H311, ATE dermal = 311 mg/kg bw, Eye Dam. 1; H318, Skin Corr. 1; H314, Skin Sens. 1A; H317, C ≥ 0.0015 % EUH071, Aquatic Acute 1; H400, M = 100 Aquatic Chronic 1; H410, M = 100]	**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. 3-(difluoromethyl)-1-methyl-*N*-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Lact. H362; Aquatic Acute 1; H400, M=1, Aquatic Chronic 1; H410 M= 1]	**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.
17. oxathiapiprolin (ISO);	
RAC adopted <u>by consensus</u> the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Aquatic Chronic 1; H410 (M=1)]	**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.
18. m-bis(2,3-epoxypropoxy)benzene	
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, ATE(oral)= 500 mg/kg bw Acute Tox. 3; H311, ATE(dermal)= 300 mg/kg bw, Carc. 1B; H350	**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.
19. silthiofam (ISO)	

RAC adopted by consensus the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [STOT RE 2; H373 and 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.
20. N-methoxy-N-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen	
RAC agreed to classify the substance for environmental hazards as indicated in Table 2 below. **RAC** discussed the human health hazards of the substance and reached preliminary agreement on classifications for carcinogenicity (Carc. 2; H351) and toxicity to reproduction (Repr. 2; H361f). **RAC** concluded that further scrutiny was needed to fully assess the human health hazards of the substance and that a second plenary debate was required. [Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410 (M=1)]	**Rapporteur** to provide the revised draft opinion to the Secretariat reflecting the plenary discussion. **SECR** to launch a written RAC consultation on the revised draft opinion and to table the dossier for a second plenary discussion RAC 48 (March 2019).
21. Uvinul A Plus	
RAC adopted by consensus the opinion with a proposal to remove the existing harmonised classification and labelling as indicated in Table 1 below. [no classification]	**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 Rapporteur. **SECR** to forward the adopted opinion and its annexes to COM and publish it on the ECHA website.
22. Lead	
RAC adopted by consensus the opinion with a proposal for the harmonised classification and labelling as indicated in Table 1 below. [Aquatic Acute 1; H400 (M=1) and Aquatic Chronic 1; H410 (M=10) Retain HH: Repr. 1A, H360FD, Lact. H362]	**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. *N*,*N*-dimethylformamide	
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.
2. Five cobalt salts	
RAC agreed that the dossier conforms to the Annex XV requirements. RAC took note of the recommendations to the dossier submitter.	**Rapporteurs** to update the RAC final outcome of the conformity check in line with the RAC agreement. **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. Plastic and rubber granulates containing PAHs	
Rapporteurs presented and RAC discussed the first draft opinion. RAC agreed on identified hazard: • Polycyclic aromatic hydrocarbons (PAH) induce carcinogenic effects in animals after oral, dermal and inhalative exposure • For mutagenicity / carcinogenicity of benzo[a]pyrene and other PAHs RAC cannot identify a threshold, the mechanism of these effects is known in detail • Association of increased lung cancer and occupational airborne PAH exposure in human epidemiological studies • Concentrations of eight PAHs in material for synthetic turf pitches in loose form on playground and sport applications should be as low as reasonably achievable	**Rapporteurs** to prepare the second draft opinion, taking into account RAC-47 discussions, by early February 2019.

• There is uncertainty in the dose response compared to the substances being restricted. RAC agreed on the proposed exposure assessment. Based on information on exposure, RAC agreed on the risk characterisation and a limit of 20 mg/kg, acknowledging the uncertainties in the assumptions. RAC agreed that a restriction under REACH is the most appropriate EU wide measure, noting the uncertainty on the end of waste status of the granules and mulches.	
2. Substances used in tattoo inks and permanent make-up	
Rapporteurs presented and RAC discussed the revised fourth draft opinion. RAC adopted the opinion on this restriction proposal by consensus.	**Rapporteurs** to make final editorial changes (as discussed during RAC-47) 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 agreed on the document RAC/47/2018/04 "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 upload the agreed A-listing procedure to the ECHA website.
10.2 Authorisation applications	

a) Discussion on key issues	
-	
b) Agreement on Draft Opinions	
1. CT_MAHLE (1 use) RAC agreed on the draft opinion as proposed by the Rapporteur. RAC is of the opinion that the RMMs and OCs described in the application are appropriate and effective in limiting the risk to workers and the humans via the environment. RAC decided to recommend additional conditions and monitoring arrangements for the authorisation and the review report as explained in the draft opinion. RAC agreed to give no advice to SEAC on the length of the review period.	**Rapporteur** together with **SECR** to do the final editing of the draft opinion. **SECR** to send the draft opinion to the applicants for commenting.
2. CT_Doosan (1 use) RAC agreed on the draft opinion as proposed by the Rapporteur. RAC is of the opinion that the RMMs and OCs described in the application will be appropriate and effective in limiting the risk to workers and the humans via the environment when the conditions are met. RAC decided to recommend additional conditions and monitoring arrangements for the authorisation and the review report as explained in the draft opinion. RAC agreed to give no advice to SEAC on the length of the review period.	**Rapporteur** together with **SECR** to do the final editing of the draft opinion. **SECR** to send the draft opinion to the applicants for commenting.
c) Adoption of final opinions	
1. CT_Hapoc_2 (1 use) RAC adopted by consensus the final opinion with no changes in the draft opinion following the Applicant's comments.	**SECR** to send the final opinion to the EC, MSs and the Applicant.
10.3 Review Reports	
a) Discussion on key issues	
1. RR1_TCE_Spolana The Rapporteur presented the key issues in the RR of the application for authorisation.	
b) Adoption of final opinions	
1. RR1_DEHP_PP (2 uses) RAC adopted by consensus the final opinions with changes and clarifications in justification and conditions of the draft opinions following the Applicant's comments.	**Rapporteurs** together with **SECR** to do the final editing of the opinions. **SECR** to send the final opinions to the EC, MSs and the Applicant.

11. AOB	
1. Addendum to RAC Note on CTPHT RAC agreed on the addendum to the RAC Note on CTPHT.	**SECR** to publish the addendum on the ECHA website.
12. Action points and main conclusions of RAC-47	
SECR to upload the adopted action points to CIRCA BC.	

Table 1: CLH opinions which were adopted at RAC-47

1 K-HDO
2 Cu-HDO
3 Iprovalicarb (ISO)
4 DOTE
5 2,4-dinitrophenol
6 Dibenzo[def,p]chrysene
7 Pirimiphos-methyl (ISO)
8 Flurochloridone (ISO)
9 DCOIT
10 Octhilinone (ISO) (OIT)
11 Oxathiapiprolin (ISO)
12 Silthiofam (ISO)
13 Hexythiazox (ISO)
14 Thiencarbazone-methyl (ISO)
15 Phosphine
16 Resorcinol diglycidyl ether
17 Fluxapyroxad
18 Uvinul A Plus
19 Lead

1. K-HDO

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	611-RST-VW-Y	potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]	-	66603-10-9	Flam. Sol. 1 Acute Tox. 3 STOT RE 2 Skin Irrit. 2 Eye Dam. 1 Aquatic Chronic 2	H228 H301 H373 (gastrointestinal tract, liver, kidneys) H315 H318 H411	GHS02 GHS06 GHS08 GHS05 GHS09 Dgr	H228 H301 H373 (gastrointestinal tract, liver, kidney) H315 H318 H411			
RAC opinion	611-RST-VW-Y	potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]	-	66603-10-9	Flam. Sol. 1 Acute Tox. 3 STOT RE 2 Skin Irrit. 2 Eye Dam. 1 Aquatic Chronic 2	H228 H301 H373 (liver) H315 H318 H411	GHS02 GHS06 GHS08 GHS05 GHS09 Dgr	H228 H301 H373 (liver) H315 H318 H411		oral: ATE = 136 mg/kg bw	
Resulting Annex VI entry if agreed by COM	611-RST-VW-Y	potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]	-	66603-10-9	Flam. Sol. 1 Acute Tox. 3 STOT RE 2 Skin Irrit. 2 Eye Dam. 1 Aquatic Chronic 2	H228 H301 H373 (liver) H315 H318 H411	GHS02 GHS06 GHS08 GHS05 GHS09 Dgr	H228 H301 H373 (liver) H315 H318 H411		oral: ATE = 136 mg/kg bw	

2. Cu-HDO

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	bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]	239-703-4	312600-89-8 15627-09-5	Flam. Sol. 1 Acute Tox. 4 STOT RE 2 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H228 H302 H373 (gastrointestinal tract, liver, kidney) H318 H400 H410	GHS02 GHS07 GHS08 GHS05 GHS09 Dgr	H228 H302 H373 (gastrointestinal tract, liver, kidneys) H318 H410		M=1 M=1	
RAC opinion	TBD	bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]	239-703-4	312600-89-8 15627-09-5	Flam. Sol. 1 Acute Tox. 4 STOT RE 2 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H228 H302 H373 (liver) H318 H400 H410	GHS02 GHS07 GHS08 GHS05 GHS09 Dgr	H228 H302 H373 (liver) H318 H410		oral: ATE = 360 mg/kg bw M=1 M=1	
Resulting Annex VI entry if agreed by COM	TBD	bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]	239-703-4	312600-89-8 15627-09-5	Flam. Sol. 1 Acute Tox. 4 STOT RE 2 Eye Dam. 1 Aquatic Acute 1 Aquatic Chronic 1	H228 H302 H373 (liver) H318 H400 H410	GHS02 GHS07 GHS08 GHS05 GHS09 Dgr	H228 H302 H373 (liver) H318 H410		oral: ATE = 360 mg/kg bw M=1 M=1	

3. Iprovalicarb

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	iprovalicarb (ISO); isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate	-	140923-17-7	Carc. 2	H351	GHS08 Wng	H351			
RAC opinion	TBD	iprovalicarb (ISO); isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate	-	140923-17-7	Carc. 2	H351	GHS08 Wng	H351			
Resulting Annex VI entry if agreed by COM	TBD	iprovalicarb (ISO); isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate	-	140923-17-7	Carc. 2	H351	GHS08 Wng	H351			

4. DOTE

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 state-ment Code(s)	Suppl. Hazard statement Code(s)		
Current Annex VI entry	050-027-00-7	2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	239-622-4	15571-58-1	Repr. 1B	H360D	GHS08 Dgr	H360D			
Dossier submitter's proposal	050-027-00-7	2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	239-622-4	15571-58-1	**Add** STOT RE 1 Aquatic Chronic 2 **Modify** Repr. 2	**Add** H372 (thymus) H411 **Modify** H361d	**Retain** GHS08 Dgr **Add** GHS09	**Add** H372 (thymus) H411 **Modify** H361d			
RAC opinion	050-027-00-7	2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	239-622-4	15571-58-1	**Retain** Repr. 1B **Add** STOT RE 1 Aquatic Acute 1 Aquatic Chronic 1	**Retain** H360D **Add** H372 (immune system) H400 H410	**Retain** GHS08 Dgr **Add** GHS09	**Retain** H360D **Add** H372 (immune system) H410			
Resulting Annex VI entry if agreed by COM	050-027-00-7	2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	239-622-4	15571-58-1	Repr. 1B STOT RE 1 Aquatic Acute 1 Aquatic Chronic 1	H360D H372 (immune system) H400 H410	GHS08 GHS09 Dgr	H360D H372 (immune system) H410			

5. 2,4-dinitrophenol

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	609-041-00-4	2,4-dinitrophenol	200-087-7	51-28-5	Acute Tox. 3 * Acute Tox. 3 * Acute Tox. 3 * STOT RE 2 * Aquatic Acute 1	H331 H311 H301 H373 ** H400	GHS06 GHS08 GHS09 Dgr	H331 H311 H301 H373 ** H400			
Dossier submitters proposal	609-041-00-4	2,4-dinitrophenol	200-087-7	51-28-5	**Retain** Acute Tox. 3 * Aquatic Acute 1 **Modify** Acute Tox. 3 Acute Tox. 2 STOT RE 2	**Retain:** H331 H311 H400 **Modify** H300 H373	**Retain** GHS06 GHS08 GHS09 Dgr	**Retain:** H331 H311 H400 **Modify** H300 H373		**Add** dermal: ATE = 600 mg/kg bw oral: ATE = 35 mg/kg bw	
RAC opinion	609-041-00-4	2,4-dinitrophenol	200-087-7	51-28-5	**Retain:** Acute Tox. 3 * Aquatic Acute 1 **Modify:** Acute Tox. 2 Acute Tox. 3 STOT RE 1	**Retain:** H331 H311 H400 **Modify:** H300 H372	**Retain** GHS06 GHS08 GHS09 Dgr	**Retain:** H311 H331 H400 **Modify:** H300 H372		**Add** dermal: ATE = 300 mg/kg bw oral: ATE = 30 mg/kg bw	
Resulting Annex VI entry if agreed by COM	609-041-00-4	2,4-dinitrophenol	200-087-7	51-28-5	Acute Tox. 3 * Acute Tox. 3 Acute Tox. 2 STOT RE 1 Aquatic Acute 1	H331 H311 H300 H372 H400	GHS06 GHS08 GHS09 Dgr	H331 H311 H300 H372 H400		dermal: ATE = 300 mg/kg bw oral: ATE = 30 mg/kg bw	

6. Dibenzo[def,p]chrysene

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	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	601-RST-VW-Y	dibenzo[*def,p*]chrysene; dibenzo[*a,l*]pyrene	205-886-4	191-30-0	Carc. 1B Muta. 2	H350 H341	GHS08 Dgr	H350 H341		Carc. 1B; H350: C ≥ 0,001 %	
RAC opinion	601-RST-VW-Y	dibenzo[*def,p*]chrysene; dibenzo[*a,l*]pyrene	205-886-4	191-30-0	Carc. 1B Muta. 2	H350 H341	GHS08 Dgr	H350 H341		Carc. 1B; H350: C ≥ 0,001 %	
Resulting Annex VI entry if agreed by COM	601-RST-VW-Y	dibenzo[*def,p*]chrysene; dibenzo[*a,l*]pyrene	205-886-4	191-30-0	Carc. 1B Muta. 2	H350 H341	GHS08 Dgr	H350 H341		Carc. 1B; H350: C ≥ 0,001 %	

7. Pirimiphos-methyl (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	015-134-00-5	pirimiphos-methyl (ISO); O-[2-(diethylamino)-6-methylpyrimidin-4-yl] O,O-dimethyl phosphorothioate	249-528-5	29232-93-7	Acute Tox. 4 * Aquatic Acute 1 Aquatic Chronic 1	H302 H400 H410	GHS07 GHS09 Wng	H302 H410			
Dossier submitters proposal	015-134-00-5	pirimiphos-methyl (ISO); O-[2-(diethylamino)-6-methylpyrimidin-4-yl] O,O-dimethyl phosphorothioate	249-528-5	29232-93-7	**Retain**: Aquatic Acute 1 Aquatic Chronic 1 **Add**: STOT RE 1 **Modify**: Acute Tox. 4	**Retain**: H302 H400 H410 **Add**: H372 (AChE inhibition)	**Retain** GHS07 GHS09 **Add** GHS08 **Modify** Dgr	**Retain**: H302 H410 **Add**: H372 (AChE inhibition)		**Add**: oral: ATE = 1414 mg/kg bw M=1000 M=1000	
RAC opinion	015-134-00-5	pirimiphos-methyl (ISO); O-[2-(diethylamino)-6-methylpyrimidin-4-yl] O,O-dimethyl phosphorothioate	249-528-5	29232-93-7	**Retain**: Aquatic Acute 1 Aquatic Chronic 1 **Add**: STOT RE 1 **Modify**: Acute Tox. 4	**Retain**: H302 H400 H410 **Add**: H372 (nervous system)	**Retain** GHS07 GHS09 **Add** GHS08 **Modify** Dgr	**Add**: H372 (nervous system) **Retain**: H302 H410		**Add**: oral: ATE = 1414 mg/kg bw M=1000 M=1000	
Resulting Annex VI entry if agreed by COM	015-134-00-5	pirimiphos-methyl (ISO); O-[2-(diethylamino)-6-methylpyrimidin-4-yl] O,O-dimethyl phosphorothioate	249-528-5	29232-93-7	Acute Tox. 4 STOT RE 1 Aquatic Acute 1 Aquatic Chronic 1	H302 H372 (nervous system) H400 H410	GHS07 GHS08 GHS09 Dgr	H302 H372 (nervous system) H410		oral: ATE = 1414 mg/kg bw M=1000 M=1000	

8. Flurochloridone (ISO)

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	3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one	262-661-3	61213-25-0	Repr. 1B Acute Tox. 4 Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H360Df H302 H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H360Df H302 H317 H410		M=100 M=100	
RAC opinion	TBD	3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one	262-661-3	61213-25-0	Repr. 1B Acute Tox. 4 Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H360FD H302 H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H360FD H302 H317 H410		oral: ATE = 500 mg/kg bw M=100 M=100	
Resulting Annex VI entry if agreed by COM	TBD	3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one	262-661-3	61213-25-0	Repr. 1B Acute Tox. 4 Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H360FD H302 H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H360FD H302 H317 H410		oral: ATE = 500 mg/kg bw M=100 M=100	

9. DCOIT

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	4,5-dichloro-2-octyl-2H-isothiazol-3-one (ISO); [DCOIT]	264-843-8	64359-81-5	Acute Tox. 1 Acute Tox. 4 Skin Corr. 1 Eye Dam. 1 Skin Sens. 1A Aquatic Acute 1 Aquatic Chronic 1	H330 H302 H314 H318 H317 H400 H410	GHS06 GHS05 GHS09 Dgr	H330 H302 H314 H317 H410	EUH071	Skin Sens. 1A; H317: C ≥ 0,001 % M=100 M=100	
RAC opinion	TBD	4,5-dichloro-2-octyl-2H-isothiazol-3-one (ISO); [DCOIT]	264-843-8	64359-81-5	Acute Tox. 2 Acute Tox. 4 Skin Corr. 1 Eye Dam. 1 Skin Sens. 1A Aquatic Acute 1 Aquatic Chronic 1	H330 H302 H314 H318 H317 H400 H410	GHS06 GHS05 GHS09 Dgr	H330 H302 H314 H317 H410	EUH071	inhalation: ATE = 0.16 mg/L (dusts and mists) oral: ATE = 567 mg/kg bw Skin Irrit. 2; H315: 0,025 % ≤ C < 5 % Eye Irrit. 2; H319: 0,025 % ≤ C < 3 % Skin Sens. 1A; H317: C ≥ 0,0015 % M=100 M=100	
Resulting Annex VI entry if agreed by COM	TBD	4,5-dichloro-2-octyl-2H-isothiazol-3-one (ISO); [DCOIT]	264-843-8	64359-81-5	Acute Tox. 2 Acute Tox. 4 Skin Corr. 1 Eye Dam. 1 Skin Sens. 1A Aquatic Acute 1 Aquatic Chronic 1	H330 H302 H314 H318 H317 H400 H410	GHS06 GHS05 GHS09 Dgr	H330 H302 H314 H317 H410	EUH071	inhalation: ATE = 0.16 mg/L (dusts and mists) oral: ATE = 567 mg/kg bw Skin Irrit. 2; H315: 0,025 % ≤ C < 5 %	

										Eye Irrit. 2; H319: 0,025 % ≤ C < 3 % Skin Sens. 1A; H317: C ≥ 0,0015 % M=100 M=100	

10. Octhilinone (ISO) (OIT)

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	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	613-112-00-5	octhilinone (ISO); 2-octyl-2*H*-isothiazol-3-one	247-761-7	26530-20-1	Acute Tox. 3 * Acute Tox. 3 * Acute Tox. 4* Skin Corr. 1B Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H331 H311 H302 H314 H317 H400 H410	GHS06 GHS05 GHS09 Dgr	H331 H311 H302 H314 H317 H410		Skin Sens. 1; H317: C ≥ 0,05 %	
Dossier submitters proposal	613-112-00-5	octhilinone (ISO); 2-octyl-2*H*-isothiazol-3-one; [OIT]	247-761-7	26530-20-1	**Add** Eye Dam. 1 **Modify** Acute Tox. 2 Acute Tox. 3 Acute Tox. 3 Skin Sens. 1A **Retain** Skin Corr. 1B Aquatic Acute 1 Aquatic Chronic 1	**Add** H318 **Modify** H330 H301 **Retain** H311 H314 H317 H400 H410	**Retain** GHS06 GHS05 GHS09 Dgr	**Modify** H330 H301 **Retain** H311 H314 H317 H410	**Add** EUH071	**Modify** Skin Sens. 1A; H317: C ≥ 0,005 % **Add** M=100 M=100	
RAC opinion	613-112-00-5	octhilinone (ISO); 2-octyl-2*H*-isothiazol-3-one; [OIT]	247-761-7	26530-20-1	**Add** Eye Dam. 1 **Modify** Acute Tox. 2 Acute Tox. 3 Acute Tox. 3 Skin Corr. 1 Skin Sens. 1A **Retain** Aquatic Acute 1 Aquatic Chronic 1	**Add** H318 **Modify** H330 H301 **Retain** H311 H314 H317 H400 H410	**Retain** GHS06 GHS05 GHS09 Dgr	**Modify** H330 H301 **Retain** H311 H314 H317 H410	**Add** EUH071	**Add** inhalation: ATE = 0.27 mg/L (dusts and mists) oral: ATE = 125 mg/kg bw dermal : ATE = 311 mg/kg bw M=100 M=100 **Modify** Skin Sens. 1A; H317: C ≥ 0,0015 %	
Resulting Annex VI entry if	613-112-00-5	octhilinone (ISO); 2-octyl-2*H*-isothiazol-3-one; [OIT]	247-761-7	26530-20-1	Acute Tox. 2 Acute Tox. 3 Acute Tox. 3 Skin Corr. 1	H330 H311 H301 H314	GHS06 GHS05 GHS09 Dgr	H330 H311 H301 H314	EUH071	inhalation: ATE = 0.27 mg/L (dusts and mists)	

agreed by COM					Eye Dam. 1 Skin Sens. 1A Aquatic Acute 1 Aquatic Chronic 1	H318 H317 H400 H410		H317 H410		oral: ATE = 125 mg/kg bw dermal : ATE = 311 mg/kg bw Skin Sens. 1A; H317: C ≥ 0,0015 % M=100 M=100	

11. Oxathiapiprolin (ISO)

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	613-RST-00-X	oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone	-	1003318-67-9	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H400 H410		M=1 M=1	
RAC opinion	613-RST-00-X	oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone	-	1003318-67-9	Aquatic Chronic 1	H410	GHS09 Wng	H410		M=1	
Resulting Annex VI entry if agreed by COM	613-RST-00-X	oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone	-	1003318-67-9	Aquatic Chronic 1	H410	GHS09 Wng	H410		M=1	

12. Silthiofam (ISO)

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	silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide	-	175217-20-6	Repr. 2 STOT RE 2 Aquatic chronic 2	H361d H373 H411	GHS08 GHS09 Wng	H361d H373 H411			
RAC opinion	TBD	silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide	-	175217-20-6	STOT RE 2 Aquatic Chronic 2	H373 H411	GHS08 GHS09 Wng	H373 H411			
Resulting Annex VI entry if agreed by COM	TBD	silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide	-	175217-20-6	STOT RE 2 Aquatic Chronic 2	H373 H411	GHS08 GHS09 Wng	H373 H411			

13. Hexythiazox (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	613-125-00-6	hexythiazox (ISO); *trans*-5-(4-chlorophenyl)-*N*-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	-	78587-05-0	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410			
Dossier submitters proposal	613-125-00-6	hexythiazox (ISO); *trans*-5-(4-chlorophenyl)-*N*-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	-	78587-05-0	**Retain** Aquatic Acute 1 Aquatic Chronic 1	**Retain** H400 H410	**Retain** GHS09 Wng	**Retain** H410		**Add** M=1 M=1	
RAC opinion	613-125-00-6	hexythiazox (ISO); *trans*-5-(4-chlorophenyl)-*N*-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	-	78587-05-0	**Retain** Aquatic Acute 1 Aquatic Chronic 1	**Retain** H400 H410	**Retain** GHS09 Wng	**Retain** H410		**Add** M=1 M=1	
Resulting Annex VI entry if agreed by COM	613-125-00-6	hexythiazox (ISO); *trans*-5-(4-chlorophenyl)-*N*-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	-	78587-05-0	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1 M=1	

14. Thiencarbazone-methyl (ISO)

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	thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate	-	317815-83-1	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1000 M=1000	
RAC opinion	607-RST-VW-Y	thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate	-	317815-83-1	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1000 M=1000	
Resulting Annex VI entry if agreed by COM	607-RST-VW-Y	thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate	-	317815-83-1	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1000 M=1000	

15. Phosphine

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	015-181-00-1	phosphine	232-260-8	7803-51-2	Flam. Gas 1 Press. Gas Acute Tox. 2 * Skin Corr. 1B Aquatic Acute 1	H220 H330 H314 H400	GHS02 GHS04 GHS06 GHS05 GHS09 Dgr	H220 H330 H314 H400			U
Dossier submitters proposal	015-181-00-1	phosphine	232-260-8	7803-51-2	**Modify** Acute Tox. 1	**Retain** H330	**Retain** GHS06	**Retain** H330		**Add** inhalation: ATE = 11 ppmV (gases)	U
RAC opinion	015-181-00-1	phosphine	232-260-8	7803-51-2	**Modify** Acute Tox. 1	**Retain** H330	**Retain** GHS06	**Retain** H330		**Add** inhalation: ATE = 10 ppmV (gases)	U
Resulting Annex VI entry if agreed by COM	015-181-00-1	phosphine	232-260-8	7803-51-2	Flam. Gas 1 Press. Gas Acute Tox. 1 Skin Corr. 1B Aquatic Acute 1	H220 H330 H314 H400	GHS02 GHS04 GHS06 GHS05 GHS09 Dgr	H220 H330 H314 H400		inhalation: ATE = 10 ppmV (gases)	U

16. Resorcinol diglycidyl ether

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	603-065-00-9	resorcinol diglycidyl ether; *1,3*-bis(2,3-epoxypropoxy)benzene	202-987-5	101-90-6	Carc. 2 Muta. 2 Acute Tox. 4 * Acute Tox. 4 * Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1 Aquatic Chronic 3	H351 H341 H312 H302 H315 H319 H317 H412	GHS08 GHS07 Wng	H351 H341 H312 H302 H315 H319 H317 H412			
Dossier submitters proposal	603-065-00-9	*m*-bis(2,3-epoxypropoxy)benzene; resorcinol diglycidyl ether	202-987-5	101-90-6	**Modify** Carc. 1B Acute Tox. 3 Acute Tox. 4	**Retain** H302 **Modify** H350 H311	**Add** GHS06 **Modify** Dgr **Remove** GHS07	**Retain** H302 **Modify** H350 H311		**Add** dermal: ATE = 744 mg/kg bw oral: ATE = 980 mg/kg bw	
RAC opinion	603-065-00-9	*m*-bis(2,3-epoxypropoxy)benzene; resorcinol diglycidyl ether	202-987-5	101-90-6	**Retain** Muta. 2 Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1 Aquatic Chronic 3 **Modify** Carc. 1B Acute Tox. 3 Acute Tox. 4	**Retain** H341 H302 H315 H319 H317 H412 **Modify** H350 H311	**Add** GHS06 **Modify** Dgr **Remove** GHS07	**Retain** H341 H302 H315 H319 H317 H412 **Modify** H350 H311		**Add** oral: ATE = 500 mg/kg bw dermal: ATE = 300 mg/kg bw	
Resulting Annex VI entry if agreed by COM	603-065-00-9	*m*-bis(2,3-epoxypropoxy)benzene; resorcinol diglycidyl ether	202-987-5	101-90-6	Carc. 1B Muta. 2 Acute Tox. 3 Acute Tox. 4 Skin Irrit. 2 Eye Irrit. 2 Skin Sens. 1 Aquatic Chronic 3	H350 H341 H311 H302 H315 H319 H317 H412	GHS08 GHS06 Dgr	H350 H341 H311 H302 H315 H319 H317 H412		oral: ATE = 500 mg/kg bw dermal: ATE = 300 mg/kg bw	

17. Uvinul A Plus

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	607-693-00-4	hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl)benzoate; hexyl 2-[4-(diethylamino)-2-hydroxybenzoyl]benzoate	443-860-6	302776-68-7	Aquatic Chronic 4	H413		H413			
Dossier submitters proposal	607-693-00-4	hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl)benzoate; hexyl 2-[4-(diethylamino)-2-hydroxybenzoyl]benzoate	443-860-6	302776-68-7	**Modify** Aquatic Chronic 1	**Modify** H410		**Modify** H410		**Add** M=1000	
RAC opinion	607-693-00-4	hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl)benzoate; hexyl 2-[4-(diethylamino)-2-hydroxybenzoyl]benzoate	443-860-6	302776-68-7	**Remove** Aquatic Chronic 4	**Remove** H413		**Remove** H413			
Resulting Annex VI entry if agreed by COM	607-693-00-	hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl)benzoate; hexyl 2-[4-(diethylamino)-2-hydroxybenzoyl]benzoate	443-860-6	302776-68-7	No Annex VI entry						

18. Fluxapyroxad (ISO)

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	616-RST-VW-Y	3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad	-	907204-31-3	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1 M=1	
RAC opinion	616-RST-VW-Y	3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad	-	907204-31-3	Lact. Aquatic Acute 1 Aquatic Chronic 1	H362 H400 H410	GHS09 Wng	H362 H410		M=1 M=1	
Resulting Annex VI entry if agreed by COM	616-RST-VW-Y	3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad	-	907204-31-3	Lact. Aquatic Acute 1 Aquatic Chronic 1	H362 H400 H410	GHS09 Wng	H362 H410		M=1 M=1	

19. 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=10	
Resulting Annex VI entry if agreed by COM	Existing or TBD	TBD	231-100-4	7439-92-1	Repr. 1A Lact. Aquatic Acute 1 Aquatic Chronic 1	H360FD H362 H400 H410	GHS08 GHS09 Dgr	H360FD H362 H410		[1] Repr. 1A; H360D: C ≥ 0,03 % M=1 M=10	

Table 2: CLH opinions carried over to RAC-48/adopted via written procedure

1. **Lysmeral**
2. **Mancozeb (ISO)**
3. **Pydiflumetofen**

1. Lysmeral[7]

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	605-RST-VW-Y	2-(4-tert-butylbenzyl)propionaldehyde	201-289-8	80-54-6	Repr. 2	H361f	GHS08 Wng	H361f			
RAC opinion	605-RST-VW-Y	2-(4-tert-butylbenzyl)propionaldehyde	201-289-8	80-54-6	Repr. 1B	H360Fd	GHS08 Dgr	H360Fd			
Resulting Annex VI entry if agreed by COM	605-RST-VW-Y	2-(4-tert-butylbenzyl)propionaldehyde	201-289-8	80-54-6	Repr. 1B	H360Fd	GHS08 Dgr	H360Fd			

[7] Classification was agreed at RAC-47 and opinion will be adopted via written procedure.

2. Mancozeb

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	006-076-00-1	mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	-	8018-01-7	Repr. 2 Skin Sens. 1 Aquatic Acute 1	H361d *** H317 H400	GHS08 GHS07 GHS09 Wng	H361d *** H317 H400		M=10	
Dossier submitters proposal	006-076-00-1	mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	-	8018-01-7	**Retain** Skin Sens. 1 Aquatic Acute 1 **Add** STOT RE 2 Aquatic Chronic 1 **Remove** Repr. 2	**Retain** H317 H400 **Add** H373 (thyroid, nervous system)(oral) H410 **Remove** H361d ***	**Retain** GHS08 GHS07 GHS09 Wng	**Retain** H317 **Add** H373 (thyroid, nervous system)(oral) H410 **Remove** H361d *** H400		**Retain** M=10 **Add** M=10	
RAC opinion	006-076-00-1	mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	-	8018-01-7	**Modify** Repr. 1B **Retain** Skin Sens. 1 Aquatic Acute 1 **Add** STOT RE 2 Aquatic Chronic 1	**Modify** H360D **Retain** H317 H400 **Add** H373 (thyroid, nervous system) H410	**Retain** GHS08 GHS07 GHS09 **Modify** Dgr	**Modify** H360D **Retain** H317 **Add** H373 (thyroid, nervous system) H410 **Remove** H400		**Retain** M=10 **Add** M=10	
Resulting entry in Annex VI if adopted by RAC and agreed by Commission	006-076-00-1	mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt			Repr. 1B STOT RE 2 Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H360D H373 (thyroid, nervous system) H317 H400 H410	GHS08 GHS07 GHS09 Dgr	H360D H373 (thyroid, nervous system) H317 H410		M=10 M=10	

3. Pydiflumetofen (ISO)

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	616-RST-VW-Y	*N*-methoxy-*N*-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen	-	1228284-64-7	Aquatic Acute 1 Aquatic Chronic 1	H400 H410	GHS09 Wng	H410		M=1 M=1	
RAC opinion	616-RST-VW-Y	*N*-methoxy-*N*-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen	-	1228284-64-7	Carc. 2 Repr. 2 Aquatic Acute 1 Aquatic Chronic 1	H351 H361f H400 H410	GHS08 GHS09 Wng	H351 H361f H410		M=1 M=1	
Resulting Annex VI entry if agreed by COM	616-RST-VW-Y	*N*-methoxy-*N*-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen	-	1228284-64-7	Carc. 2 Repr. 2 Aquatic Acute 1 Aquatic Chronic 1	H351 H361f H400 H410	GHS08 GHS09 Wng	H351 H361f H410		M=1 M=1	

Part III. List of Attendees of the RAC-47 meeting

RAC Members
Agapiou Agapios
Aquilina Gabriele
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
Pribu Mihaela
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
Tsitsimpikou Christina
Zeljezic Davor
Invited expert
Mahiout Selma (29.11.2018)

Members' advisers
Arabi Azadeh (Bert-Ove Lund)
Crowther Ally (Andrew Smith)_CLH hexythiazox
Esposito Dania (Pietro Paris)_CLH pirimiphos-methyl and oxathiapiprolin
Van Herwijnen René (Betty Hakkert)_CLH dote
Kuittinen Marko (Riitta Leinonen)
Mahiout Selma (Tiina Santonen)
Peczkowska Beata (Boguslaw Baranski)_CLH adviser for thiencarbazone-methyl
Sonnenburg Anna (Ralf Stahlmann)_CLH adviser for lysmeral
Talasniemi Petteri (Riitta Leinonen)
Vega Milagros (Joao Carvalho)_CLH hexythiazox
Commission
Garcia John Enrique (DG GROW)
Regular stakeholder observers
Annys Erwin (CEFIC)
Comini Andrea (EuCheMS)
Rowe Rocky (ECPA)
Verougstraete Violaine (Eurometaux)
Waeterschoot Hugo (Eurometaux)
Apologies, stakeholders
Barry Frank (ETUC)
Bernard Alice (ClientEarth)
Romano Mozo Dolores (EEB)
Occasional stakeholder observers
Akdag Ali (CIRFS)_restriction DMF

Dossier submitters
Clausen Ian Henning (DK)_CLH lead
Hareng Lars (BASF)_CLH lysmeral
Munch Pernille (DK)_CLH lead
Stakeholder experts
Bade Steffen (Cefic/BASF)_K-HDO_Cu-HDO
Baken Stijn (Eurometaux/European Copper Institure)_Art 77(3) copper compounds
Bomann Werner (ECPA/Toxconsult LLC)_iprovalicarb_thiencarbazone-methyl
Chowdhury Jasim (Eurometaux/International Lead Association)_Lead metal
Chrobak Robert (ECPA/Dow/DuPont)_DCOIT
Gelbke Heinz-Peter (CIRFS)_DMF
Harder Volker (ECPA/Nisso)_hexythiazox
Kluxen Felix (ECPA/Adama Deutschland GmbH)_flurochioriode
Lloyd Sara (ECPA/Syngenta)_pirimiphos-methyl_pydiflumetofen
Martens Mark (ECPA/Certic Europe)_silthiofam
Odum Jenny (ECPA/RSA/UNiphos)_mancozeb
Pawlowski Sascha (Cefic/BASF SE)_Uvinul A Plus
Richards-Doran Ryan (ECPA/Corteva Agrischience)_oxathiapiprolin
Salsbury Joseph (Cefic/Galata Chemicals)_DOTE
Truisi Germaine (Cefic/Thor GmbH)_DCOIT
Schuster Paul Xaver (Cefic/BASF SE)_lysmeral
Werner Christoph (ECPA/BASF SE)_fluxapyroxad
Viegas Vanessa (EM/Cobalt Institute and Cobalt REACH Consortium Ltd)_cobalt

REMOTE PARTICIPANTS	
RAC Members	**FR**
Losert Annemarie	Guillou Pauline (Phospine)
Printemps Nathalie	**IT**
Tobiassen Lea Stine	Attias Leonello (N,N-dimethylformamide)
Tsitsimpikou Christina	Catone Tiziana (N,N-dimethylformamide)
	Russo Maria Teresa (N,N-dimethylformamide)
Members' advisers	**NL**
Beestra Renske (Betty Hakkert)	Ter Burg Wouter (PAHs)
Catone Tiziana (Gabriele Aquilina)	Geraets Lisbeth (PAHs)
Gomes Jeannette (Betty Hakkert)	Luit Richard (PAHs)
Lecloux Hélène (Julie Seba)	Verhoeven Julia (PAHs)
Marinkovic Marino (Betty Hakkert)	**No**
Martin Theresa (Ralf Stahlmann)	Blom Cécile (tattoo inks)
Russo Maria Teresa (Gabriele Aquilina)	Gaustad Astrid (DCOIT)
Woutersen Marjolijn (Betty Hakkert)	Lindeman Birgitte (DCOIT)
	Spikkerud Erlend (DCOIT)
SEAC rapporteurs	Øystein Fotland Tor (tattoo inks)
Fankhauser Simone (Cobalt salts)	**UK**
Fiore Karine (DEHP)	Peppin Lindsay (mancozeb)
Luit Richard (tattoo inks)	
Dossier submitters	**Commission**
AT	Blass Rico Ana Maria
Altmann Dominik (Cu-HDO, K-HDO)	Luvara Giuseppina
Paparella Martin (Cu-HDO, K-HDO)	Morris Alick
Wallner Karoline (Cu-HDO, K-HDO)	Rozwadowski Jacek
DE	**EFSA**
Kassner Franziska (Uvinul A Plus)	Court Marques Daniele
Staude Claudia (Uvinul A Plus)	Crivellente Federica
Trubiroha Achim (tattoo inks)	De Lentdecker Chloé

ECHA staff
Blainey Mark
Bowmer Tim, Chairman
Broeckaert Fabrice
Dvorakova Dana
Georgiadis Nikolaos
Gmeinder Michael
Hellsten Kati
Henrichson Sanna
Jaagus Triin
Jones Stella
Karjalainen Ari
Kivelä Kalle
Kokkola Leila
Kosk-Bienko Joanna
Lapenna Silvia
Ludborzs Arnis
Luschutzky Evita
Marques-Camacho Mercedes
Mushtaq Fesil
Nicot Thierry
Nygren Jonas
Orispää Katja
O´Rourke Regina
Mushtaq Fesil
Peltola Jukka
Perazzolo Chiara
Pillet Monique
Prevedouros Konstantinos
Rheinberger Christoph
Roggeman Maarten

Sadam Diana
Simoes Ricardo
Smilovici Simona
Sosnowski Piotr
Spjuth Linda
Stoyanova Evgenia
Toledo Calvo Pablo
Uphill Simon
Van Haelst Anniek

Part IV. LIST OF ANNEXES

ANNEX I Final Agenda of the RAC-47 meeting

ANNEX II List of documents submitted to the Members of the Committee for Risk Assessment for the RAC-47 meeting

ANNEX III Declarations of conflicts of interest to the Agenda of the RAC-47 meeting

ANNEX IV Administrative issues and information items

ANNEX V Short summary: Environmental Rapporteurs' workshop

20 November 2018
RAC/A/47/2018

Final Agenda

47th meeting of the Committee for Risk Assessment

20 - 23 November 2018
27 - 30 November 2018

ECHA Conference Centre (Annankatu 18, Helsinki)

Tuesday 20 November starts at 14.00
Friday 30 November ends at 13.00

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC/A/47/2018
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 and Article 77(3)(c) requests

For agreement

Item 5 – Report from other ECHA bodies and activities

a) Report on RAC 46 action points, written procedures and update on other ECHA bodies

RAC/47/2018/01
(room document)
For information

b) RAC workplan for all processes

For information

c) General RAC procedures

RAC/47/2018/02
For discussion
RAC/47/2018/03
For agreement

d) INTERACT Project

e) RAC Stakeholder Satisfaction Survey 2018

For information

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

6.1 Copper compounds (M-factor)

For discussion

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)

potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]: physical hazards, acute toxicity, STOT SE, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity, environmental hazards

bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]: physical hazards, acute toxicity, STOT SE, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity

thiencarbazone-methyl (ISO): acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, STOT RE, germ cell mutagenicity, toxicity to reproduction, environmental hazards

hexythiazox (ISO): environmental hazards

flurochloridone (ISO): physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT RE, germ cell mutagenicity, carcinogenicity, environmental hazards

iprovalicarb (ISO): physical hazards, acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, germ cell mutagenicity, toxicity to reproduction, STOT SE, environmental hazards

2,4-Dinitrophenol: acute oral toxicity

dibenzo[def,p]chrysene: germ cell mutagenicity

mancozeb (ISO): skin sensitisation, environmental hazards

4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT): physical hazards, acute dermal toxicity, germ cell mutagenicity, carcinogenicity, STOT RE

pirimiphos-methyl (ISO): acute toxicity, germ cell mutagenicity, environmental hazards

octhilinone (ISO); [OIT]: acute dermal toxicity, serious eye damage / eye irritation, STOT SE

fluxapyroxad: physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, germ cell mutagenicity, environmental hazards, hazardous to ozone layer

oxathiapiprolin (ISO): physical hazards, acute toxicity, STOT SE, skin corrosion / irritation, serious eye damage / eye irritation, respiratory or skin sensitisation, STOT RE, germ cell mutagenicity

m-bis(2,3-epoxypropoxy)benzene; resorcinol diglycidyl ether: acute dermal toxicity

Silthiofam (ISO): acute toxicity, skin corrosion / irritation, serious eye damage / eye irritation, skin sensitisation, STOT SE, germ cell mutagenicity, environmental hazards

Pydiflumetofen: environmental hazards [*HH to be confirmed*]

B. Hazard classes for agreement with plenary debate

1) potassium (oxido-*NNO*-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]
2) bis(*N*-hydroxy-*N*-nitrosocyclohexylaminato-*O*,*O'*)copper; bis(*N*-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]
3) thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1*H*-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5- methylthiophene-3-carboxylate
4) 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]
5) hexythiazox (ISO); trans-5-(4-chlorophenyl)-*N*-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide
6) flurochloridone (ISO); 3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one
7) iprovalicarb (ISO) isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate
8) 2,4-dinitrophenol
9) phosphine
10) dibenzo[def,p]chrysene
11) mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt
12) 2-(4-*tert*-butylbenzyl)propionaldehyde
13) 4,5-dichloro-2-octyl-2*H*-isothiazol-3-one (DCOIT)
14) pirimiphos-methyl (ISO)
15) octhilinone (ISO); 2-octyl-2H-isothiazol-3-one; [OIT]
16) 3-(difluoromethyl)-1-methyl-*N*-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad
17) oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1*H*-pyrazol-1-yl]ethanone
18) *m*-bis(2,3-epoxypropoxy)benzene
19) silthiofam (ISO); *N*-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide
20) *N*-methoxy-*N*-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen
21) hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl) benzoate
22) lead

For discussion and adoption

Item 9 – Restrictions

9.1 Restriction Annex XV dossiers

a) Conformity check and key issues discussion

1) *N*,*N*-dimethylformamide
2) Five cobalt salts

For agreement

b) Opinion development

1) Plastic and rubber granulates containing PAHs– first draft opinion

For discussion

2) Substances used in tattoo inks and permanent make-up – final draft opinion

For adoption

Item 10 – Authorisation

10.1 General authorisation issues

a) Update on incoming/future applications

For information

b) AfA A-listing draft procedure

RAC/47/2018/04
For agreement

10.2. Authorisation applications

a) Agreement on draft opinions

1. CT_MAHLE (1 use)
2. CT_Doosan (1 use)

For discussion and agreement

b) Adoption of final opinions

1. CT_Hapoc_2 (1 use)

For discussion and adoption

10.3. Review reports

a) Discussion on key issues
   2. RR1_TCE_Spolana

For discussion

c) Adoption of final opinions
   a. RR1_DEHP_PP (2 uses)

For discussion and adoption

Item 11 – AOB

Item 12 – Action points and main conclusions of RAC-47

Table with Conclusions and Action points from RAC-47

For adoption

Annex II (RAC 47)

Documents submitted to the Members of the Committee for Risk Assessment for the RAC 47 meeting.

Document number	Title
RAC/A/47/2018	Final Draft Agenda
RAC/A/47/2018 Restricted	Draft outline Agenda
RAC/47/2018/01 Room document	Administrative issues and information items
RAC/47/2018/02	A proposal for clarifying and strengthening the role of the Committee's rapporteurs in relation to Working Groups of RAC and their operation
RAC/47/2018/03	A proposal for a mandate for a Working Group of RAC on Applications for Authorisation
RAC/47/2018/04	AfA A-listing draft procedure
RAC/47/2018/05	OPINION RESPONSE-TO-COMMENTS TABLE (following RAC comments received by 30 October 2018 (ENV) and by 9 November (HH) on harmonised classification and labelling of pydiflumetofen)

ANNEX III (RAC-47)

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 SCHLUTER	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		
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.
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

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
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 SCHLUTER	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 in the event of a vote on this substance - no other mitigation measures applied.
Rubber granulates (eight polycyclic aromatic hydrocarbons (PAHs[8]) 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.

[8] 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)

New dossiers

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
NEW		
Applications for Authorisation		
CT_Doosan (1 use)	Ruth MOELLER	Working in the institute which is cooperating with a company that is a subsidiary of the AfA submitter. No personal involvement.
Harmonised classification & labelling		
1) 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE] **2) 2,4-Dinitrophenol** **3) Dibenzo[def,p]chrysene** **4) Uvinul A Plus** **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. 1), 2), and 3) personal involvement.
	Urs SCHLUTER	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
	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.
1) thiencarbazone-methyl (ISO) **2) Mancozeb (ISO)** **3) fluxapyroxad** **4) Pirimiphos-methyl (ISO)** **5) octhilinone (ISO); [OIT]** **UK**	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 measures applied. Personal involvement in 1), 3) and 5).
	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. Personal involvement in drafting / commenting on the environmental part of the dossiers.
1) Phosphine **2) Pydiflumetofen** **FR**	Nathalie PRINTEMPS	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
1) cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO] **2) bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]** **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. No personal involvement.
	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. No personal involvement.
Hexythiazox (ISO) **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.
m-bis(2,3-epoxypropoxy)benzene; resorcinol diglycidyl ether **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
1) Iprovalicarb (ISO) **2) Oxathiapiprolin (ISO)** **3) Silthiofam (ISO)** **IE**	Brendan MURRAY	Working for the CA submitting the dossiers; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. Personal involvement in 1), 2) and 3).
4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT) **NO**	Christine BJORGE	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
	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. Personal involvement

ANNEX IV RAC 47

Helsinki, 14 November 2018

RAC/47/2018/01

ROOM DOCUMENT

47TH MEETING OF THE COMMITTEE FOR RISK ASSESSMENT

20 – 30 November 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-46 Action Points

The RAC-44 action points due for RAC-47 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 CLH opinion on penflufen	15 October 2018	closed
Written procedure for adoption of the minutes of RAC-46	5 November 2018	closed

2.2 RAC consultations (status by 9 November 2018)

Subject / document	Deadline	Status / follow-up
Harmonised classification and labelling		
potassium (oxido-NNO-azoxy)cyclohexane; cyclohexylhydroxydiazene 1-oxide, potassium salt; [K-HDO]	30 October 2018	closed
bis(N-hydroxy-N-nitrosocyclohexylaminato-O,O')copper; bis(N-cyclohexyl-diazenium-dioxy)-copper; [Cu-HDO]		
thiencarbazone-methyl (ISO); methyl 4-[(4,5-dihydro-3-methoxy-4-methyl-5-oxo-1H-1,2,4-triazol-1-yl)carbonylsulfamoyl]-5-methylthiophene-3-carboxylate	29 October 2018 (ENV) 2 November 2018 (HH)	closed
2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate; [DOTE]	23 October 2018	closed
hexythiazox (ISO); trans-5-(4-chlorophenyl)-N-cyclohexyl-4-methyl-2-oxo-3-thiazolidine-carboxamide	30 October 2018	closed
flurochloridone (ISO); 3-chloro-4-(chloromethyl)-1-[3-(trifluoromethyl)phenyl]pyrrolidin-2-one	29 October 2018	closed
Iprovalicarb (ISO) isopropyl [(2S)-3-methyl-1-{[1-(4-methylphenyl)ethyl]amino}-1-oxobutan-2-yl]carbamate	25 October 2018	closed
2,4-Dinitrophenol	16 October 2018	closed
Phosphine	24 October 2018	closed

Subject / document	Deadline	Status / follow-up
dibenzo[def,p]chrysene	23 October 2018	closed
Mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	29 October 2018	closed
2-(4-tert-butylbenzyl)propionaldehyde, lysmeral	29 October 2018	closed
4,5-dichloro-2-octyl-2H-isothiazol-3-one [DCOIT]	23 October 2018	closed
Pirimiphos-methyl (ISO)	29 October 2018	closed
octhilinone (ISO); 2-octyl-2H-isothiazol-3-one; [OIT]	29 October 2018	closed
3-(difluoromethyl)-1-methyl-N-(3',4',5'-trifluorobiphenyl-2-yl)pyrazole-4-carboxamide; fluxapyroxad	2 November 2018	closed
oxathiapiprolin (ISO); 1-(4-{4-[5-(2,6-difluorophenyl)-4,5-dihydro-1,2-oxazol-3-yl]-1,3-thiazol-2-yl}piperidin-1-yl)-2-[5-methyl-3-(trifluoromethyl)-1H-pyrazol-1-yl]ethanone	30 October 2018	closed
m-bis(2,3-epoxypropoxy)benzene, resorcinol diglycidyl ether	23 October 2018	closed
Silthiofam (ISO); N-allyl-4,5-dimethyl-2-(trimethylsilyl)thiophene-3-carboxamide	29 October 2018	
N-methoxy-N-[1-methyl-2-(2,4,6-trichlorophenyl)-ethyl]-3-(difluoromethyl)-1-methylpyrazole-4-carboxamide; pydiflumetofen	30 October 2018 (ENV) 9 November 2018 (HH)	closed
Lead *(ENV)*	5 November 2018	closed
hexyl 2-(1-(diethylaminohydroxyphenyl)methanoyl)benzoate; hexyl 2-[4-(diethylamino)-2-hydroxybenzoyl]benzoate (Uvinul A Plus)	2 November 2018	closed
Application for Authorisation / Review Report		
RR1_TCE_Spolana Consultation on review report	14 November 2018 to 9 January 2019	will open
CT_MAHLE Consultation on draft opinion	8 November 2018	closed
RR1_DEHP_PP	6 November 2018	closed

Subject / document	Deadline	Status / follow-up
Consultation on draft final opinions		
CT_Doosan Consultation on draft opinion	2 November 2018	closed
Consultation on the draft A-listing procedure for applications for authorisation	30 October 2018	closed
Restrictions		
Consultation on fourth draft opinion on tattoo inks	29 October 2018	closed
Consultation on Annex XV dossier on rubber granulates	26 October 2018	closed
Consultation on the conformity of Annex XV dossier on cobalt	12 November 2018	ongoing
Consultation on the conformity of Annex XV dossier on DMF	12 November 2018	ongoing
Art. 77. 3. c request		
no consultations		
Art. 77. 3. c request on evaluations OELs		
no consultations		

2.3 Other written consultations of RAC (status by 9 November 2018)

Subject / document	Deadline	Status / follow-up
Written procedure for adoption of the minutes of RAC-46	5 November 2018	closed

2.4 Calls for expression of interest

Calls for expression of interest	Date	Outcome
Harmonised classification and labelling		
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[9].		
Restriction Call for expression of interest in rapporteurship for the restriction dossiers to be	Until 26 October 2018	closed

[9] 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)

submitted in January 2019		

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

Appointment of (Co-)rapporteur(s)	Substance	Deadline	Outcome
Harmonised classification and labelling - no written procedures			
Applications for Authorisation– no written procedures			
Restrictions – no written procedures			

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	
PCO_IP (2 opinions)	6 September 2018
Diglyme_Omnichem (1 opinion)	10 September 2018
RR1_DEHP_VINYLOOP (2 opinions)	11 September 2018
CT_Hapoc (2 opinions)	24 September 2018
CT_Hapoc_3 (1 opinion)	24 September 2018
PCO_Aviall (2 opinions)	24 September 2018
DtC_Wesco (1 opinion)	24 September 2018
SC_Wesco (1 opinion)	24 September 2018

ANNEX V

Short summary: Environmental Rapporteurs' workshop

Prior to the RAC plenary meeting an informal workshop for the RAC Members was held with the focus on three topics related to hazards to aquatic environment mainly in the context of CLP.

Firstly, participants discussed conditions and criteria that need to be fulfilled so that non-standard tests can be used for classification purposes, namely repeatability, reproducibility allowing verification and comparison of the results, adequacy of a test (different aspects of its relevance and reliability). The participants agreed to summarise the main aspects in a short paper to be used in future evaluations in the CLP process.

The meeting further touched upon the challenging issue of assessing large ecotoxicity and biodegradation data sets and the relevance of biodegradability tests for UVCB substances.

In addition, an overview of Court cases involving RAC opinions was given by the Secretariat (Legal Affairs Unit). This perspective on Committee interaction and presentation of cases was found very useful by the participating Members and an update with further details concerning recent CLP-related cases will be provided to the plenary meeting at RAC 48.