



EUROPEAN COMMISSION
DIRECTORATE GENERAL JRC
JOINT RESEARCH CENTRE
Institute for Health and Consumer Protection
Unit: Toxicology and Chemical Substances
European Chemicals Bureau

ECBI/92/06 Rev.1

Ispra, September 13, 2006

Summary Record

Commission Working Group on the Classification and Labelling of Dangerous Substances

Meeting on Environmental Effects of Existing Chemicals, Pesticides & New Chemicals

April 26 - 27, 2006

Hotel Concorde, Arona

Elisabet Berggren and Hans Steinkellner chaired the meeting.

1. 1. Adoption of the Draft Agenda

The Draft Agenda was adopted without further comments.

1. 2. Adoption of Summary Records

Meeting on Environmental Effects of Existing Chemicals, Pesticides & New Chemicals, Ispra, September, 2005	ECBI/48/05 Rev. 1 (sent out already by e-mail)
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The Summary Record was adopted without further comments.

2. Group Entry for Nickel Compounds

ECBI/96/04 Add. [2](#) (initial proposal from DK) , [4](#) , [6](#) , [7](#) , [8](#) , [9](#) , [10](#) , [11](#) , [12](#) , [13](#) , 14 Part [I](#) and [II](#) , [15](#) and [16](#)
[ECBI/96/04 Add. 2 Rev.1](#) (revised proposal from DK) and Add. 21 Part [I](#) and [II](#) ,
Add. [22](#) , [23](#) and [24](#) and [ECBI/38/06](#)
and [ECBI/96/04 Add. 25](#) including the Human Health part of the Danish proposal for grouping nickel entries agreed at the meeting of the TC C&L 03/2006.

ECB reported that the discussions on the human health part on grouping nickel entries had been finalised and the entries agreed already (TC C&L HH 03 2006). **ECB** then gave the floor to **DK** who had drafted the proposal for grouping nickel entries.

DK reported briefly about the written procedure to revise the nickel entries in the original DK proposal taking into consideration concerns from Member States and Industry arriving to a final proposal that seemed to be agreeable to all parties. Document ECBI/96/04 Add. 25 (a list containing the nickel entries) had been prepared after the Health meeting in March on request from the ECB to have a draft list with the revised Ni-entries to be included in the 31st ATP. A final report about the grouping of nickel entries would be issued by **DK** very soon. The application of N; 50-53 for the different nickel entries was correct and moreover the classification of nickel subsulfide had to be changed from the current N; R51-53 into N; R50-53 in order to be consistent. Note H would also apply for the entries. **DK** would welcome comments also to that.

IND (Hugo Waterschoot) agreed that the updated table was accurate. However, concerning the environmental classification he was of the opinion that that had no priority. **IND** clearly supported the use of solubility data as a basis for classification. Furthermore they welcomed the changes made in the document (ECBI/96/04 Add. 25). He added that also the application of Note H was appropriate.

S congratulated **DK** again to their work and confirmed that the application of Note H was appropriate. The classification of the nickel oxides listed there was based on a default assumption could be revised whenever data came up.

DK said that if there would be a reason to revise the proposed classification they would of course be re-considered. But that should not hamper or delay the decision on the grouping of nickel entries now.

ECB summarising the discussion concluded that the proposal on grouping nickel entries would be integrated completely as it was laid down in the Danish document in the draft list for the 31st ATP. **DK** thanked the TC C&L and the ECB and pointed out that they would check document ECBI/96/04 Add. 25 again and wanted to send out a final document after the meeting.

Final Conclusion:

The TC C&L ENV agreed to the revised DK proposal (ECBI/96/04 Add. 2 Rev. 1) for environmental endpoints. An overview of the entries to be included in the draft 31st ATP is found in ECBI/96/04 Add. 25 (already distributed with the meeting agenda).

3. Discussion of Metals

C040	Nickel powder	Not in Annex I	ECBI/26/95 Add. 66 , 67 , and
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	<i>HH: Nickel (“metal”) is in the draft 30th ATP.</i>	CAS: 7440-02-0 EC: 231-111-4	68 , 69 , 70 , 71 , 72 , 73 and 74 Documents from the written validation: ECBI/26/95 Add. 75 , 76 , 77 , 78 , 79 and 80 , 81 , 82 and 83 ECBI/26/95 Add. 84 , 85 and 86
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ECB reported that nickel powder was already discussed for a long time and that now after having had also a written validation of the data it would be possible to finalise the discussion. **ECB** asked the Group if everybody now could agree to classify the substance as R52-53.

IND pointed out that they could agree to that classification adding that the values provided for acute and chronic toxicity were o.k. and they agreed furthermore with the related comments from DK.

The **TC C&L** agreed to the proposed classification.

ECB quoting document ECBI/26/95 added that there was apparently a problem on how to define the entry for the substance. **DK** thanked **IND** for their agreement to their proposal adding that a PNEC was not provided since the RAR was not yet finalised. **IND** referring to the issue of how to define the entry said that entries should not be split too much in Annex I. Let’s keep it simple. Two entries: one < 0.1 mm and one ≥ 0.1 mm. **ECB** said that it depended still on the health classification if there would be two entries or just one. It could not be said yet whether there would be only a nickel “powder” entry or also a nickel “metal” entry in addition. . There is already an entry for nickel. The question is whether an additional entry for finely divided nickel, for environmental hazard reasons, is needed as well. This is independent of the human health classification. If an additional entry is made for environmental reasons only then the human health classification will simply be the same in the two entries. The word “metal” is superfluous, nickel as nickel IS a metal. There is nickel, and nickel powder, and in addition different nickel compounds. **IND** noted that the term “INCO” (ECB: initially added to the substance name) should be removed since it was a company name only. He added that actually the surface of a particle should be used for its definition and not the diameter as solubility depended on the surface and not on the size. **S** noted that it was agreed to consider particles with a diameter less than 1 mm as a powder. **IND** replied that that was a default value and that in the future that would change. They proposed to use the surface instead. **DK** agreed that there was a point in using the surface instead of the diameter but for the moment the diameter threshold should be kept.

Final Conclusion:

Nickel powder (particle size diameter < 1 mm) C040 Not in Annex I CAS: 7440-02-0 EC: 231-111-4 *HH: Nickel (“metal”) is in the draft 30th ATP.*

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
R52-53 S61	Solubility ≥ L(E)C ₅₀	No rapid partitioning from the water column (default in absence of information)	No relevant information (also not applicable)	Solubility ≥ NOEC
Specific concentration limits:	Not applicable			

C024	Diantimony trioxide (S) <i>HH: to be discussed.</i>	Index: 051-005-00-X CAS: 1309-64-4 EC: 215-175-0	ECBI/31/06 Adds. <u>1</u> and <u>2</u>
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S said that their proposal was either not to classify the substance or to apply R52-53. He then went into the details for the proposal. There were a number of dissolution tests and the dissolution was apparently pH-dependent. The results for acute toxicity were borderline between no classification and R52-53 and came from “non-standard species”. The results from the tests with Hydra sp. would trigger the classification. Using all data including those from long term test, no classification could also be justified.

ECB then asked IND to present their papers that have not been posted on the agenda since they were submitted after the deadline. IND said that in the guidelines it was written that if you have evidence from other species it can be used for classification. But in this case there was good data from standard species. “Data rich” substances were always punished because if you have a lot of data it is very likely to have one data point meriting classification. In this case there were good data from standard species. The non-standard species should not be used. And moreover even when considering non-standard species no classification was warranted. E said that this here was a difficult issue but certainly all data had to be taken into account for classification. DK proposed to apply 52-53 since there was no way of getting proof whether or not the escape clause would be applicable. But he had no firm opinion on that. FIN said that the results from Hydra should be used and that the escape clause applied. (i.e. no classification). F shared the opinion of FIN. UK agreed also saying that data from Hydra was valid but when looking at acute/chronic ratio no classification was warranted. S agreed that if you look at the acute/chronic ratio the escape clause would apply. He would agree to no classification. DK also agreed to use the escape clause.

The TC C&L agreed not to classify the substance.

Follow-up: IND has submitted documents after the deadline for the meeting (ECBI/31/06 Adds. 3 and 4 –distributed with follow-up I)

Final Conclusion (after follow-up period):

Diantimony trioxide (S) C024 Index: 051-005-00-X CAS: 1309-64-4 EC: 215-175-0 *HH: to be discussed.*

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification	Solubility \geq L(E)C ₅₀	No rapid partitioning from the water column (default in absence of information)	No relevant information	NOEC > solubility
Specific concentration limits:	Not applicable			

4. Discussion of Pesticides

4. 1. Discussion of Pesticides notified under Directive 91/414/EEC

P621	Metconazole (B) <i>HH: agreed 11/2005.</i>	Not in Annex I CAS: 125116-23-6 Not in EINECS	ECBI/06/05 Add. 1
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The TC C&L agreed to the proposed classification.

Final Conclusion:

Metconazole (B) P621 Not in Annex I CAS: 125116-23-6 Not in EINECS
HH: agreed 11/2005.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S 61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	No relevant information	Not relevant
Specific concentration limits:	Not applicable			

P623	Clodinafop-propargyl (NL) <i>HH : agreed 11/2005.</i>	Not in Annex I CAS: 105512-06-9 Not in EINECS	
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The substance was not discussed at the meeting since no proposal was submitted.

Follow-up: The Netherlands had sent in a proposal (ECBI/06/05 Add.1) and had asked ECB for classification of the substance in a written procedure (human health classification is already finalised).

ECB asked the TC C&L to react within the follow-up period to the Dutch proposal/proposed classification. No reaction will be considered as agreement to the proposed classification.

FU II: Comment from Sweden: I find the proposal inconclusive as a stand-alone document. E.g. I would have liked to know some more of the tests and see some remarks of validity (and or observations) as well as references (now lacking). However, I trust that the presented data are valid and if no more information will be presented I can, however, accept this classification.

FU III: The substance will be classified as outlined in the box.

Final Conclusion (after follow-up period):

Clodinafop-propargyl (NL) P623 Not in Annex I CAS: 105512-06-9 Not in EINECS *HH : agreed 11/2005*

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	BCF < 100	Not relevant
Specific concentration limits:	Not applicable			

P592	Pyrimethanil (A) <i>HH: N.C. agreed 03/2006.</i>	Not in Annex I CAS: 53112-28-0 NOT in EINECS	ECBI/160/04 Add. 1 and Add. 2
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The **TC C&L** agreed to the proposed classification.

Final Conclusion:

Pyrimethanil (A) P592 Not in Annex I CAS: 53112-28-0 Not in EINECS

HH: agreed 03/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S 61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	$\log K_{\text{now}} < 3$	Not relevant
Specific concentration limits:	Not applicable			

P593	Triticonazole (A) <i>HH: N.C. agreed 03/2006.</i>	Not in Annex I CAS: 131983-72-7 Not in EINECS	ECBI/160/04 Add. 1 and Add. 3
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AT introduced their proposal to classify the substance as N; R51-53 and explained the data in document ECBI/160/04 Add. 1. She added that there was also Chironomus data and sedimentation was very quick. She wanted to have the opinion of the Group.

UK asked if it would be possible to circulate the data. **AT** said that the data was contained in the RAR and that the NOEC was only available from Chironomus. **IND** said that the company that placed the substance on the market was not present. Maybe the issue should be discussed rather in the follow-up period. E noted that the EbC50 in Lemna was 1.1 mg/l (ECB: data can be found in the RAR) which was a borderline value for classification with N; R50-53. The ErC would anyway only be higher (ECB: leading to classification with N; R51-53). **HU** (that has sent in a proposal also) agreed fully to classify the substance with N; R51-53.

The **TC C&L** agreed to classify the substance as N; R51-53.

Final Conclusion:

Triticonazole (A) P593 Not in Annex I CAS: 131983-72-7 Not in EINECS

HH: agreed 03/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S 61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	$BCF < 100$ $\log K_{\text{ow}} > 3$	Not relevant

Specific concentration limits:	Not applicable
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P622	Trinexepac-ethyl (NL) <i>HH N.C. agreed 03/2006.</i>	Not in Annex I CAS: 95266-40-3 Not in EINECS	
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The substance was not discussed at the meeting since no proposal was submitted.

Follow-up: The Netherlands had sent in a proposal (ECBI/154/04 Add.1) and had asked ECB for classification of the substance in a written procedure (human health classification is already finalised).

ECB asked the TC C&L to react within the follow-up period to the Dutch proposal/proposed classification. No reaction would be considered as agreement to the proposed classification.

FU II: Comment from Sweden: Again there are no remarks or observation given. Neither any references. The whole point with a classification proposal like this is that it is supposed to be a “stand-alone” document. Regarding degradation it just say “No” without any references to test or test-result. Regarding toxicity I have no idea whether these are the only valid (I presume) data or if there are more. I am sorry to say, but I can not accept to classify based on this proposal.

FU III: Since there was no reaction to the Swedish comments (see above) the substance will be discussed at the next meeting.

Final Conclusion (after follow-up period):

Trinexepac-ethyl (NL) P622 Not in Annex I CAS: 95266-40-3 Not in EINECS

HH: agreed 03/2006 (no classification).

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
[R52-53] [S 61]	[10 < L(E)C ₅₀ ≤ 100]	[Not readily degradable (based on data)]	[BCF < 100] [log K _{ow} < 3]	[Not relevant]
Specific concentration limits:	[Not applicable]			

The discussion is postponed to the next meeting.

P626	Cadusafos (EL) <i>HH: to be discussed 11/2006.</i>	Not in Annex I CAS: 95465-99-9 Not in EINECS	Late proposal received For inclusion in Annex I ENV proposal from EL is needed.
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ECB postponed the discussion of the substance to the follow up since the documents from EL were submitted after the deadline.

Follow up: The substance was not discussed at the meeting since the documents (ECBI/08/06 Adds. 3, 4 and 5 - distributed with follow-up I) were submitted by Greece after the deadline. Since

the substance should be agreed for human health in the follow-up of the meeting of the TC C&L HH 03 2006 ECB would ask the TC C&L ENV to conclude the substance in a written procedure. The ECB asks the TC C&L to react within the follow-up period to the Greek proposal/proposed classification. No reaction will be considered as agreement to the proposed classification.

FUII: NL has sent in document ECBI/55/06 in which they agree to the proposal.

FUII: Sweden agrees with the proposal.

FU III: Hungary has sent in a classification proposal (ECBI/08/06 Add. 7) confirming the proposed classification. The substance will be classified as outlined in the box.

Final Conclusion (after follow-up period):

Cadusafos (EL) Not in Annex I CAS: 95465-99-9 Not in EINECS **HH: to be discussed 11/ 2006.**

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	0.0001 < L(E)C ₅₀ ≤ 0.001	Not readily degradable (based on data)	log K _{ow} > 3 BCF >100	Not relevant
Specific concentration limits:	C _n ≥ 0.025% : N, R50-53 (S60-61) 0.0025% ≤ C _n < 0.025% : N, R51-53 (S61) 0.00025% ≤ C _n < 0.0025%: R52-53 (S61)			

4. 2. Discussion on Pesticides notified under Directive 91/414/EEC **Confidential - Member States Experts and Notifier Representatives only**

Please see the confidential summary record- ECBI/90/06 Add. 1.

5. Discussion of Biocides

Revised document about planned written classification procedure : [ECBI/13/05 Rev. 1](#)
ECBI/13/05 Add.1 Part [I](#) and [II](#) and [Add. 2](#)

ECB explained briefly the planned procedure for classification of biocides that was described in ECBI/13/05 Rev. 1.

Z001	Difethialone (N) <i>HH: to be discussed 11/2006.</i>	Not in Annex I CAS: 104653-34-1 Not in EINECS	ECBI/14/06 and Adds. 1 and 2 (updated ENV proposal from Norway)
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N introduced the data in their proposal saying that acute toxicity to algae was the reason to propose N; R 50-53.

The **TC C& L** agreed to the classification as proposed.

Final Conclusion:

Difethialone (N) Z001 Not in Annex I CAS: 104653-34-1 Not in EINECS
HH: to be discussed 11/2006.

Classification	Toxicity	Degradation	Bioaccumulation	Escape clause
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S -phrases				
N, R50-53 S 60 -61	$0.001 < L(E)C_{50} \leq 0.01$	Not readily degradable (based on data)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 0.25\%$: N, R50-53 (S60-61) $0.025\% \leq C_n < 0.25\%$: N, R51-53 (S61) $0.0025\% \leq C_n < 0.025\%$: R52-53 (S61)			

Z003	Bromadiolone (S) <i>HH: to be discussed 11/2006.</i>	Not in Annex I CAS: 28772-56-7 EC: 249-205-9	ECBI/12/06
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S presented their proposal (ECBI/12/06). He noted that the proposal was based on acute toxicity in algae adding that the substance was not ready biodegradable. Thus N; R50-53 was warranted. It was also agreed to apply in this particular case S35.

The TC C& L agreed to the classification as proposed.

Final Conclusion:

Bromadiolone (S) Z003 Not in Annex I CAS: 28772-56-7 EC: 249-205-9

HH: to be discussed 11/2006

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 35-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	No relevant information	Not relevant
Specific concentration limits:	Not applicable			

6. Discussion of Existing Substances

6. 1. Discussion of Risk Assessment Substances

6. 1. 1. Continued Discussion

Summary Table from Written Procedure II: [ECBI/04/05 Rev. 4](#)

ECBI/04/05 Adds. [10](#) , [11](#) , [12](#) , [13](#) , [14](#) , [15](#) and [16](#)

All five alkyl amines have already been provisionally agreed at TC C&L ENV 09 2005 and might only be re-discussed if new relevant data will be available at TC C&L ENV 04 2006.

D130	Tallow alkyl amine (D) <i>HH: To be discussed.</i>	Not in Annex I CAS: 61790-33-8	ECBI/04/05 Add. 7
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		EC: 263-125-1	
D131	1-Octadecanamine (D) <i>HH: To be discussed.</i>	Not in Annex I CAS: 124-30-1 EC: 204-695-3	ECBI/04/05 Add. 6
D132	Cocos alkyl amine (D) <i>HH: To be discussed.</i>	Not in Annex I CAS: 61788-46-3 EC: 262-977-1	ECBI/04/05 Add. 1
D133	Hydrogenated tallow alkyl amine (D) <i>HH: To be discussed.</i>	Not in Annex I CAS: 61788-45-2 EC: 262-976-6	ECBI/04/05 Add. 2
D134	(Z)-Octadec-9-enylamine (D) <i>HH: To be discussed.</i>	Not in Annex I CAS: 112-90-3 EC: 204-015-5	ECBI/04/05 Add. 3

ECB reported that the five substances had been provisionally agreed already at the last meeting.

IND added that new data had been generated (ECB: on bioaccumulation) and that was still to be discussed at the TC NES. **D** said that the data on bioaccumulation led to R53. **D** asked the Group to confirm the already provisionally agreed classification N; R50-53. The BCF was about 100 but it might even be above 1000. **S** added that the new data would then only support the conclusion already taken and was still in favour of classifying with R50-53.

The **TC C&L** confirmed the already agreed classification as N; R50-53 and agreed also to add specific concentration limits with an M-factor of 10.

NL asked whether it was possible procedure-wise to conclude the substance even if the TC NES would still discuss the data. **D** responded that the discussion at the TC NES would most probably not change the classification so it was okay to proceed with the classification at this point. **S** in contrast to that was of the opinion that it might be worth waiting for these discussions. **UK** agreed to that. **D** said that he would be happy to conclude right now since it was not clear when IND would make the new data available.

The **TC C&L** then agreed provisionally with N; R50-53 and SCL with and M-factor of 10 and decided to wait for confirmation of the data for applying R53 in the TC NES.

S stressed that this postponing cannot go on forever. It was agreed that we could wait one more meeting to a final agreement on the provisional classification. Concerning degradation, some of the substance did pass the 10 days window some not. It was however concluded that all substances should be treated equally and they were all considered as degradable. **IND** said that at the TC NES in June there should be a discussion on the issue.

The **TC C&L** agreed to come back to the issue at the TC C&L only if D would like to take it up again.

Follow up: Alkyl Amines 1-5

The provisional classification as outlined in the boxes (1-5) above has been agreed already at TC C&L 09 2005 and was confirmed at TC C&L 04 2006. However, bioaccumulation of the alkyl amines will be discussed at TC NES II (June 12 -16 2006). Based on the outcome of this discussion Germany might propose a revision of the current classification. If that will not be the case the classification is final.

FUII: Amendments to boxes were suggested by Sweden and accepted by ECB.

FU III: Comment from Germany: Based on the discussion at TC NES II Germany sees no need for a revision of the classification. (Based on TC NES II the BCF is >100.) The substances will be classified as outlined in the boxes (1-5).

Final Conclusion (after the follow-up period) Alkyl Amines 1-5:

1. Tallow alkyl amine (D) Not in Annex I CAS: 61790-33-8 EC: 263-125-1

HH: To be discussed.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S60-61	$0.01 < L(E)C_{50} \leq 0.1$	Readily degradable (based on alkyl amines as a group)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 2.5\%$: N, R50-53 (S60-61) $0.25\% \leq C_n < 2.5\%$: N, R51-53 (S61) $0.025\% \leq C_n < 0.25\%$: R52-53 (S61)			

2. 1-Octadecanamine (D) Not in Annex I CAS: 124-30-1 EC: 204-695-3

HH: To be discussed.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S60-61	$0.01 < L(E)C_{50} \leq 0.1$	Readily degradable (based on alkyl amines as a group)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 2.5\%$: N, R50-53 (S60-61) $0.25\% \leq C_n < 2.5\%$: N, R51-53 (S61) $0.025\% \leq C_n < 0.25\%$: R52-53 (S61)			

3. Cocos alkyl amine (D) Not in Annex I CAS: 61788-46-3 EC: 262-977-1

HH: To be discussed.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S60-61	$0.01 < L(E)C_{50} \leq 0.1$	Readily degradable (based on alkyl amines as a group)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 2.5\%$: N, R50-53 (S60-61) $0.25\% \leq C_n < 2.5\%$: N, R51-53 (S61) $0.025\% \leq C_n < 0.25\%$: R52-53 (S61)			

4. Hydrogenated tallow alkyl amine (D) Not in Annex I CAS: 61788-45-2 EC: 262-976-6

HH: To be discussed.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
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N, R50-53 S60-61	$0.01 < L(E)C_{50} \leq 0.1$	Readily degradable (based on alkyl amines as a group)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 2.5\%$: N, R50-53 (S60-61) $0.25\% \leq C_n < 2.5\%$: N, R51-53 (S61) $0.025\% \leq C_n < 0.25\%$: R52-53 (S61)			

5. (Z)-Octadec-9-enylamine (D) Not in Annex I CAS: 112-90-3 EC: 204-015-5

HH: To be discussed

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S60-61	$0.01 < L(E)C_{50} \leq 0.1$	Readily degradable (based on alkyl amines as a group)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 2.5\%$: N, R50-53 (S60-61) $0.25\% \leq C_n < 2.5\%$: N, R51-53 (S61) $0.025\% \leq C_n < 0.25\%$: R52-53 (S61)			

Summary Table from Written Procedure III: ECBI/17/05 Rev. 2			
E004	2,4-dinitrotoluene (E) <i>HH: to be discussed.</i>	Index: 609-007-00-9 CAS: 121-14-2 EC: 204-450-0	ECBI/17/05 Adds. 4 , 5 7 , 8 and 11 , 12 and 13

E said that their proposal remained N; R51-53 (ECB: The substance was extensively discussed at the previous TC C&L and already agreed with N; R50-53) adding that there was an alternative proposal from DK with N; R50-53. **E** reported that here was only one data point in the range for R50 namely acute toxicity in blue green algae with an LC 50 of 0.46 mg/l. This result however was in clear-cut contradiction to other results obtained with green algae. Based on the weight of evidence the substance should be classified with N; R51-53.

DK responded that they did not understand the reasoning of **E** in regard to use a weight of evidence approach here. The effect on blue green algae can be completely different than that on green algae. He would only agree to **E** if the data on blue green algae were not valid. **IND** added that perhaps the validity of the blue green algae test could be questioned since perhaps the TC NES did not spend enough time on this issue. **S** thought that the test done with blue green algae had been considered as being valid at the TC NES and thus that should not be discussed here. He agreed completely with the reasoning of **DK** to use the results of the test on blue green algae for classification. **FIN** agreed adding that she could not understand the reasoning of **E** to apply a weight of evidence approach here. **NL** agreed and **S** added that also in the GHS guidance such an approach was not recommended.

ECB held a round-table asking all MS' experts for their opinion and a majority of them recommended to classify the substance as N; R50-53.

Several MS did not support this recommendation.

Final Conclusion:

2,4-Dinitrotoluene (E) Index: 609-007-00-9 CAS: 121-14-2 EC: 204-450-0

HH: Was revised in the 29th ATP.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	$\log K_{ow} < 3$ BCF < 100	Not relevant
Specific concentration limits:	Not applicable			

6. 1.2. First Discussion

L011	HHCB; 1,3,4,6,7,8-hexahydro-4, 6, 6, 7, 8, 8 -hexamethylin-deno [5,6-c] pyran (NL) <i>HH: to be discussed.</i>	Not in Annex I CAS: 1222-05-5 EC: 214-946-9	ECBI/91/04 Add. 2
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NL introduced their data based on which they proposed to apply N; R50-53 based on data.

The TC C&L agreed to the proposal.

Final Conclusion:

HHCB; 1,3,4,6,7,8-hexahydro-4, 6, 6, 7, 8, 8 -hexamethylin-deno [5,6-c] pyran (NL) Not in Annex I CAS: 1222-05-5 EC: 214-946-9

HH: agreed 11/2005 (No Classification).

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	$\log K_{ow} > 3$ BCF > 100	Not relevant
Specific concentration limits:	Not applicable			

L012	AHTN; 1-(5,6,7,8-tetrahydro-3,5,5,6,8,8 - hexamethyl-2-naph-thyl) ethan-1-one (NL) <i>HH: to be discussed 10/2006.</i>	Not in Annex I CAS: 1506-02-1 EC: 216-133-4	ECBI/92/04 Add. 16
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NL introduced their data based on which they proposed to apply N; R50-53 based on data.

The TC C&L agreed to the proposal.

Final Conclusion:

AHTN; 1-(5,6,7,8-tetrahydro-3,5,5,6,8,8-hexamethyl-2-naph-thyl) ethan-1-one (NL) L012 Not in Annex I CAS: 1506-02-1 EC: 216-133-4 *HH: to be discussed 10/2006.*

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	Not applicable			

G001	Anthracene (EL) <i>HH: to be discussed 10/2006.</i>	Not in Annex I CAS: 120-12-7 EC: 204-371-1	ECBI/13/06 Rev. 1 (revised CL proposal from Greece)
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ECB reported that EL proposed N; R50-53 and to apply an M-factor of 100.

The TC C&L agreed to the proposal.

Final Conclusion :

Anthracene (EL) G001 Not in Annex I CAS: 120-12-7 EC: 204-371-1

HH: to be discussed 10/2006.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.001 < L(E)C_{50} \leq 0.01$	Not readily degradable (based on data)	$\log K_{ow} > 3$ BCF >100	Not relevant
Specific concentration limits:	$C_n \geq 0.25\%$: N, R50-53 (S60-61) $0.025\% \leq C_n < 0.25\%$: N, R51-53 (S61) $0.0025\% \leq C_n < 0.025\%$: R52-53 (S61)			

L015	TBHP; Tert-butyl hydroperoxide (NL) <i>HH: to be discussed 11/2006.</i>	Not in Annex I CAS: 75-91-2 EC:200-915-7	ECBI/03/06 Add.1 (RAR) and Add. 6
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NL introduced their proposal to classify the substance as N; R51-53.

The TC C&L agreed to the proposal.

Final Conclusion :

TBHP; Tert-butyl hydroperoxide (NL) L015 Not in Annex I CAS: 75-91-2 EC: 200-915-7
HH: to be discussed 10/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S 61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	$\log K_{ow} < 3$	Not relevant
Specific concentration limits:	Not applicable			

D139	NTA; Trisodium nitrilotriacetate (D) HH: to be discussed.	Not in Annex I CAS: 5064-31-3 EC: 225-768-6	
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ECB reported that the classification proposal from D came late and suggested that the substance could be concluded in the follow-up period.

Follow-up: Germany had sent in a proposal after the deadline (ECBI/05/06 Add. 2) which was distributed together with follow-up I. If in the follow-up period members of the TC C&L ENV should comment if they disagree with the proposed classification or want to discuss the substance at the next meeting. Else the substance would be listed in the draft 31st ATP with the classification as outlined in the box.

FUII: NL had sent in document ECBI/55/06 in which they wrote that the proposal should be discussed at the next meeting.

FUII: Sweden agrees with the proposed classification.

FUII: IND sent in document ECBI/05/06 Add. 3 in which they agree with the proposed classification (no classification) but disagreed on how the box was filled. After consulting the German Rapporteur, ECB has amended the boxes accordingly.

FU II: Additionally Germany has sent in a comment for clarification: Most toxicity data is in the range of >100 mg/l. But some test show toxicity minor below 100 mg/l. The measured toxicity based on complexed ions of Ca and Mg (→ low concentration of these ions). No effects under environmental conditions expected.

FUIII: The Netherlands accepted the German reasoning. The substance will classified (i.e. not classified) as outlined in the box.

Final Conclusion (after the follow-up period):

NTA; Trisodium nitrilotriacetate (D) D139 Not in Annex I CAS: 5064-31-3 EC: 225-768-6 **HH: agreed 03/2006**

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification	$10 < L(E)C_{50} \leq 100$	Readily degradable	$\log K_{ow} < 3$ BCF < 100	Not relevant

		(based on data)		
Specific concentration limits:	Not applicable			

D143	Bis(hydroxylammonium)sulfate <i>HH: currently under ESR evaluation.</i>	Index: 612-123-00-2 CAS:10039-54-0 EC:233-118-8	ECBI/45/06 and Add.1
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D presented their proposal to classify substance as N; R50-53.

NL supported R50 but was not sure about the application of R53. **UK** said that the TC NES discussion was not concluded so R53 cannot be concluded at this stage.

The **TC C&L** agreed to be postpone the discussion until discussion at the TC NES would have been finalised.

Follow-up: Germany had sent in an e-mail stating that they would prepare a paper for the next meeting with R50 (without R53). They did not see a need any longer to change the classification in Annex I for this substance. An updated C&L dossier will be prepared together with the update of the draft RAR. The discussion of the substance is postponed to the next meeting.

Final Conclusion (after the follow-up period):

Bis(hydroxylammonium)sulfate D143 Index: 612-123-00-2 CAS: 10039-54-0 EC: 233-118-8
HH: currently under ESR evaluation

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
[N, R50] (Current classification) [S61]				
Specific concentration limits:				

The discussion was postponed to the next meeting.

U023	Propan-1-ol (D) <i>HH: to be discussed 10/2006.</i>	603-003-00-0 EC: 200-746-9 CAS: 71-23-8	
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The substance was not discussed since no classification proposal was received.

Follow-up: Germany had sent in their classification proposal after the deadline (ECBI/49/06) which is distributed with follow up I. The substance would be discussed at the next TC C&L ENV.

Final Conclusion (after the follow-up period):

Propan-1-ol (D) U023 Index: 603-003-00-0 CAS: 71-23-8 EC: 200-746-9

HH: to be discussed 10/2006.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
[No classification]				
Specific concentration limits:				

The discussion of the substance was postponed to the next meeting.

6. 2. Discussion of "Non Risk Assessment" Substances

6. 2. 1. Continued Discussion

U068	4-chlorophenylisocyanate <i>HH: agreed 01/2003.</i>	Not in Annex I CAS: 104-12-1 EC: 203-176-9	ECBI/74/02 Add. 1 and Add. 1 Rev.1 (revised proposal from UK)
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UK introduced their proposal to classify with N; R50-53 which was based on data of the breakdown product of the substance since not data was available on the parent compound.

The **TC C&L** agreed to the proposed classification.

Final Conclusion :

4-chlorophenylisocyanate U068 Not in Annex I CAS: 104-12-1 EC: 203-176-9

HH : agreed 01/2003.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	0.1 < L(E)C ₅₀ ≤ 1 mg/l (analogy with 4- chloroaniline)	Not readily degradable (analogy with 4- chloroaniline)	log K _{ow} > 3 BCF >100 (analogy with 4- chloroaniline)	Not relevant
Specific concentration limits:	Not applicable			

Note: The classification of the substance is based on read-across to its hydrolysis product 4-chloroaniline which was classified as N, R50-53 in the 24th ATP.

N002	PFOA; Perfluorooctanoic acid	Not in Annex I CAS: 335-67-1	ECBI/41/05 and Add. 1 and Adds. 2, 3, 4, 5 and
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	<i>HH: to be discussed 10/2006.</i>	EC: 206-397-9	6 , 7 and 8 (MS only)
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N proposed not to classify PFOA since the substance does not fulfil the environmental classification criteria, adding that additional information substantiating that had been sent in by IND.

D supported no classification based on a evaluation done on a national level. **IND** agreed that a study on algae was repeated confirming that there was no concern for environmental effects.

The **TC C&L** agreed not to classify PFOA.

Final Conclusion:

PFOA; Perfluorooctanoic acid N002 Not in Annex I CAS: 335-67-1 EC: 206-397-9 *HH: to be discussed 10/2006.*

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification	L(E)C ₅₀ > 100	Not readily degradable (based on data)	BCF <100	Not relevant
Specific concentration limits:	Not applicable			

F039	Ethidium Bromide <i>HH: concluded 05/2004.</i>	Not in Annex I CAS:1239-45-8 EC: 214-984-6	<u>ECBI/54/04 Add. 1</u>
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F suggested R52-53 or no classification based on lack of data for the substance since their proposal was entirely based on QSAR.

UK favoured no classification for this substance since the proposal was not based on data but only on QSAR. **E** noted that they would in principle support a classification that is based only on QSAR but he admitted that in that case the QSAR was very poor. Still he would prefer to classify based on a weak QSAR instead of not classifying in this case. **NL, IRL** and **S** agreed with **UK** not to classify the substance based on lack of data.

The **TC C&L** agreed not to classify the substance for environmental effects.

Follow-up: France also proposed an alternative classification (R 52-53) based on QSAR calculations. However, the TC C&L preferred “No classification based on lack of data” since they judged the applied QSAR to be of very limited predictive value. Denmark wanted to check further and can react in the follow-up period. The recommendation (no classification) will only be re-considered in case of strong reservations against it. Else the substance will be added to the draft list for the 31st ATP.

FU III: The substance will be classified (i.e. not classified) as outlined in the box.

Final Conclusion (after the follow-up period):

Ethidium Bromide F039 Not in Annex I CAS:1239-45-8 EC: 214-984-6

HH: agreed 05/2004.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification (lack of data)	No relevant information	Not readily degradable (default in absence of information)	$\log K_{ow} < 3$	Not relevant
Specific concentration limits:	Not applicable			

I044	Diisobutyl phthalate <i>HH: to be discussed 10/2006.</i>	Not in Annex I CAS: 84-69-5 EC: 201-553-2	ECBI/116/04 Add. 2 and Adds. 3 and 4 (sent in FU 09/2005) ECBI/38/06 and ECBI/116/04 Add. 9 (updated proposal from France)
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F proposed no classification. The main issue with that substance was the bioaccumulation potential. It was ready biodegradable but the Kow was higher than 3. They have read across from another phthalate discussed in the risk assessment program and therefore they conclude with no classification.

E said that the problem was that the main metabolite was classified with R50. He tended to agree with the proposal although there was this classified metabolite. **F** said that the toxicity value would be in the R51 and not in the R50 range and since it degraded very easily that would lead to no classification.

The **TC C&L** could not verify that the metabolite mentioned by **E** was really the metabolite to be considered for a read-across.

The **TC C&L** agreed not to classify the substance.

Final Conclusion:

Diisobutyl phthalate I044 Not in Annex I CAS: 84-69-5 EC: 201-553-2

HH: agreed 03/2006

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification	$1 < L(E)C_{50} \leq 10$	Readily degradable (based on data)	$\log K_{ow} > 3$ BCF < 100	Not relevant
Specific concentration limits:	Not applicable			

6. 2. 2 First Discussion

D140	Tetrahydro-1,3-dimethyl-1H-pyrimidin-2-one; Dimethyl propyleneurea; DMPU <i>HH: agreed 03/2006.</i>	Not in Annex I CAS: 7226-23-5 EC: 230-625-6	ECBI/06/06
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D proposed no classification for environmental effects for DMPU.

S noted that the only data given was fish data and there only a toxicity range was given. **E** said that QSAR data for algae and daphnia could be created to support the fish data. **UK** agreed that it would be helpful to see a QSAR on that. **D** promised to provide QSAR data for algae and daphnia in the follow-up. **IRL** also asked **D** also to improve the section on fish toxicity to fish as the information there indeed was only given as a range. **D** agreed to do so and would distribute a revised proposal during the FU.

The **TC C&L** agreed not to classify for environmental effects unless the QSARs to be sent in during the follow up period suggest something different.

Follow up: Measured toxicity data was only available for fish and not for other taxa. Germany had sent in a document (ECBI/ 06/06 Add. 1 - distributed in follow-up I) containing QSAR data on daphnia and algae confirming the measured value. If there is no disagreement in the follow-up period the substance would be classified as outlined in the box.

FUII: NL had sent in document ECBI/55/06 in which they agreed to the proposal.

FUII: Amendment to the box was suggested by Sweden and accepted by ECB.

FU III: The substance will be classified (i.e. not classified) as outlined in the box.

Final Conclusion (after follow-up period):

Dimethyl propyleneurea; D140 DMPU Not in Annex I CAS: 7226-23-5 EC: 230-625-6

HH: agreed 03/2006.

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
No classification	L(E)C ₅₀ > 100 (QSAR)	Not readily degradable (based on data)	log K _{ow} < 3	Not relevant
Specific concentration limits:	Not applicable			

S188	Quinoline; 1-azanaphthalene (IUPAC name) <i>HH: agreed 03/2006.</i>	Not in Annex I CAS: 91-22-5 EC: 202-051-6	ECBI/09/06 Add. 1
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ECB said that the proposal from IT (ECBI/09/06 Add. 1) was to not classify the substance for environmental effects. The alternative proposal from F that was distributed as a room document suggested classifying the substance as N; R51-53.

IT said that upon looking at the F proposal she recognized that the data used for classification by F was not considered by them and that she would now agree to the F proposal. **UK** mentioned that 68% degradation had been reported in the Italian proposal and they would like to check the degradation rate. **F** agreed that in case the data from IT on biodegradability were reliable they would re-consider their position. **IT** stressed that the data reported on biodegradability were very

old and they would check the validity in the follow-up. Both IT and F would provide data in the follow-up.

The **TC C&L** agreed to classify with provisionally with N; R51-53 and both IT and F would provide further clarification in order to get to a final conclusion in the follow-up.

Follow-up: The classification proposal from Italy (ECBI/09/06 Add.1) although submitted in time was only distributed as a room document by ECB and thus is distributed again with follow-up I. In the Italian proposal the substance is considered readily biodegradable whereas the data in the alternative French proposal (ECBI/09/06 Add. 2) show no ready biodegradability. Italy who had strong doubts about the validity of their data will react in the follow-up period if their data should prove to be valid for classification purposes. Else the substance will be classified as listed in the box.

FUII: NL had sent in document ECBI/55/06 outlining why they agreed to the proposed classification from France.

FUIII: Italy confirmed that their data was not valid and therefore they support the French proposal (R51-53). The substance will be classified as outlined in the box.

Final Conclusion (after the follow-up period):

Quinoline; 1-azanaphthalene S188 Not in Annex I CAS: 91-22-5 EC: 202-051-6

HH: agreed 03/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S 61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	$\log K_{ow} < 3$ BCF < 100	Not relevant
Specific concentration limits:	Not applicable			

B011	Menadione sodium bisulfite HH: agreed 03/2006.	Not in Annex I CAS: 130-37-0 EC: 204-987-0	ECBI/163/04
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IT proposed to classify the substance as N; R50-53.

BE, NL and **AT** agreed with the proposal.

The **TC C&L** agreed to classify with N; R50-53.

Final Conclusion:

Menadione sodium bisulfite B011 Not in Annex I CAS: 130-37-0 EC: 204-987-0

HH: agreed 03/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	No relevant information	Not relevant

Specific concentration limits:	Not applicable
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B012	Menadione nicotinamide bisulfite <i>HH: agreed 03/2006.</i>	Not in Annex I CAS: 73581-79-0 EC: 277-543-7	ECBI/162/04
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The TC C&L agreed to the IT proposal to classify the substance as N; R50-53.

Final Conclusion:

Menadione nicotinamide bisulfite B012 Not in Annex I CAS: 73581-79-0 EC: 277-543-7
HH: agreed 03/2006.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R50-53 S 60-61	$0.1 < L(E)C_{50} \leq 1$	Not readily degradable (based on data)	No relevant information	Not relevant
Specific concentration limits:	Not applicable			

F053	Tert-butyl acrylate <i>HH: no discussion foreseen.</i>	Index: 607-245-00-8 CAS: 1663-39-4 EC: 216-768-7	ECBI/46/06
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F reported that the current classification is N; R52-53 that the substance was discussed at the SIAM meeting last year and that they had integrated the data presented there in their proposal. Based on fish data they now suggest to revise the classification to N; R51-53.

The TC C&L agreed to classify with N; R51-53.

Final Conclusion:

Tert-butyl acrylate F053 Index: 607-245-00-8 CAS: 1663-39-4 EC: 216-768-7
HH: no discussion foreseen, was revised in 29th ATP.

Classification S -phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
N, R51-53 S61	$1 < L(E)C_{50} \leq 10$	Not readily degradable (based on data)	$BCF < 100$ $\log K_{ow} < 3$	Not relevant
Specific concentration limits:	Not applicable			

D142	Dodecyl methacrylate <i>HH: to be discussed.</i>	Index: 607-132-00-3 CAS: 142-90-5 EC: 205-570-6	ECBI/37/06 Adds. 1, 2, 3, 4, 5, 6, 7 and 8
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D reported that IND had provided them with several studies which in turn were forwarded by the ECB to the MS. The substance was classified N; R50-53 in the 29th ATP. The new data however suggested no classification now.

E asked whether the degradability test was also new. **D** replied that the test was not really new but it showed the substance to be readily biodegradable. **E** agreed to remove the classification. **UK** asked about the volatility of the substance and that there were some other unclarities in the German proposal. **D** promised to make a summary document to present the data and the revise the proposal in the follow up period.

The **TC C&L** agreed to postpone the discussion to the next meeting.

Follow-up: The discussion of the substance is postponed to the next meeting. Germany has sent in documents ECBI/ 37/06 Add. 9 (Classification proposal) and Add. 10 (further information) that are distributed with follow-up I.

Final Conclusion (after the follow-up period):

Dodecyl methacrylate D142 Index: 607-247-00-9 CAS: 142-90-5 EC: 205-570-6

HH: to be discussed

Classification S-phrases	Toxicity	Degradation	Bioaccumulation	Escape clause
[No classification]	[Solubility < L(E)C ₅₀]	[Readily degradable (based on data)]	[log K _{ow} > 3] [BCF >100]	[Not relevant]
Specific concentration limits:	[Not applicable]			

The discussion of the substance is postponed to the next meeting.

7. Any other Business

The use of "non-standard" species for classification purposes	ECBI/61/05
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IND noted that there was a problem with the use of data obtained with non-standard organisms for the purpose of classification for effects on the environment. There was a particular problem for pesticides which were normally data rich that meant that test data also from tests with non-standard data were available often. They have drafted a document where their concerns were formulated (ECBI/61/05). There was a problem also with the legal basis to use non standard species and the use for self-classification since these species were not specified in Annex VI. That was addressed also in their document.

DG ENV said that in Annex VI it was clearly written that it was possible to use non-standard species for classification purposes. **S** agreed with DG ENV quoting the relevant paragraph (1.7.2) of Annex VI. It was clear that there was no legal problem however guidance would be useful thus he supported an amendment of the current legislation addressing that issue. **DK** agreed to everything that was said by S and also that there should be more guidance on the use of non-standard species. In such a guidance also the weight of evidence approach for classification of environmental effects should be addressed. **ECB** said that this would suit very well into the timing of the development of the GHS guidance. **IND** pointed out that this guidance was needed already now. Moreover he pointed out that the use of non-standard species and the application of a weight of evidence approach were two separate discussions. **UK** agreed that guidance would be helpful. **IRL** referred to discussions about listing the Lemna test in the amendment to the Preparations Directive which was proposed by DK. In the end it was not included. **E** agreed that non-standard can of course be used for classification. **DG ENV** preferred to work on guidance rather than to amend any legislation. **B** made the point that it was possible to use results from non-standard species and consequently the TC C&L used them. These results are not used to self-classify. That leads to the fact that we have more stringent classifications in Annex I than in substances that don't have a harmonized classification. **IND** wanted to add also that more data did not necessarily give a better classification. They gave ad different classification. The occasional use of non-standard species leads to the fact that just by chance more stringent classifications were concluded and thus to systematic errors. He reminded the TC C&L to consider that.

ECB invited the Group to send in comments to the IND paper. They could be considered for the guidance document for RIP 3.6 (Guidance on Classification and Labelling under the Globally Harmonised System).

9. Discussion of New Substances

The Summary from the Session on New Chemicals is sent out separately.