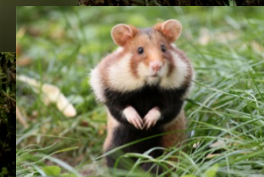


Air breathing organisms in risk assessment

Etje Hulzebos
21st March 2019

IFF

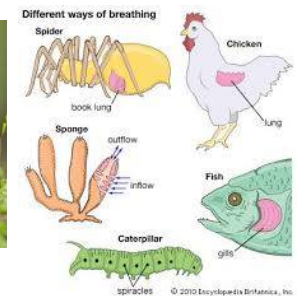


Overview

- Goal: Finding tools to deal and handle 'concern' for air breathing organisms
- Regulatory framework
 - **REACH legislation**
 - Annex
 - Tonnage
 - **What is the overall target - hazard**
 - (Hazard for Air as in IUCLID chapter 6)
 - Hazard for B in PBT (vPvB)?
 - Hazard for secondary poisoning?
- **ECHA Guidance**
 - Screening versus definitive criteria
- What is the testing strategy for substances, which fulfil screening criteria
- What are the methods that can be applied
- When and how to present this information in the registration dossier

Regulatory framework and ECHA guidance

- REACH legislation
 - In which Annex do the air breathing organism fit?
 - At which tonnage band air-breathers need assessment?
- ECHA guidance
 - Definition of organism: mammal and bird and ?
 - PBT guidance section on bioaccumulation: R11-4, pg. 68
 - What is the overall target here
 - Secondary poisoning?

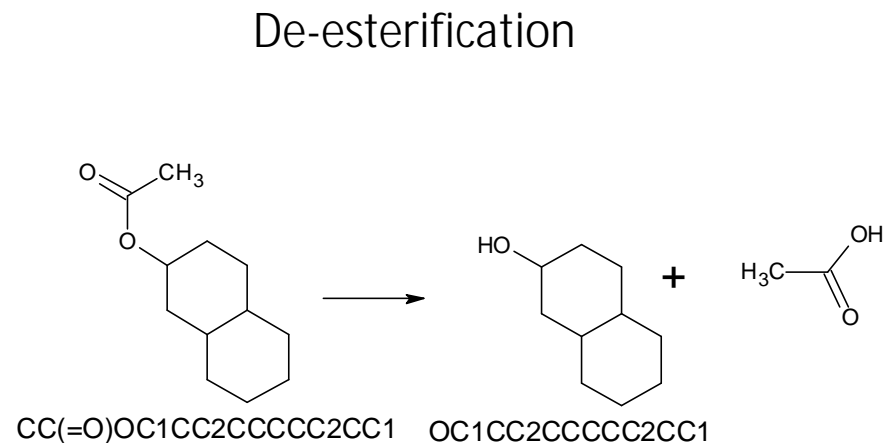


ECHA guidance to assess the concern for air breathing organisms

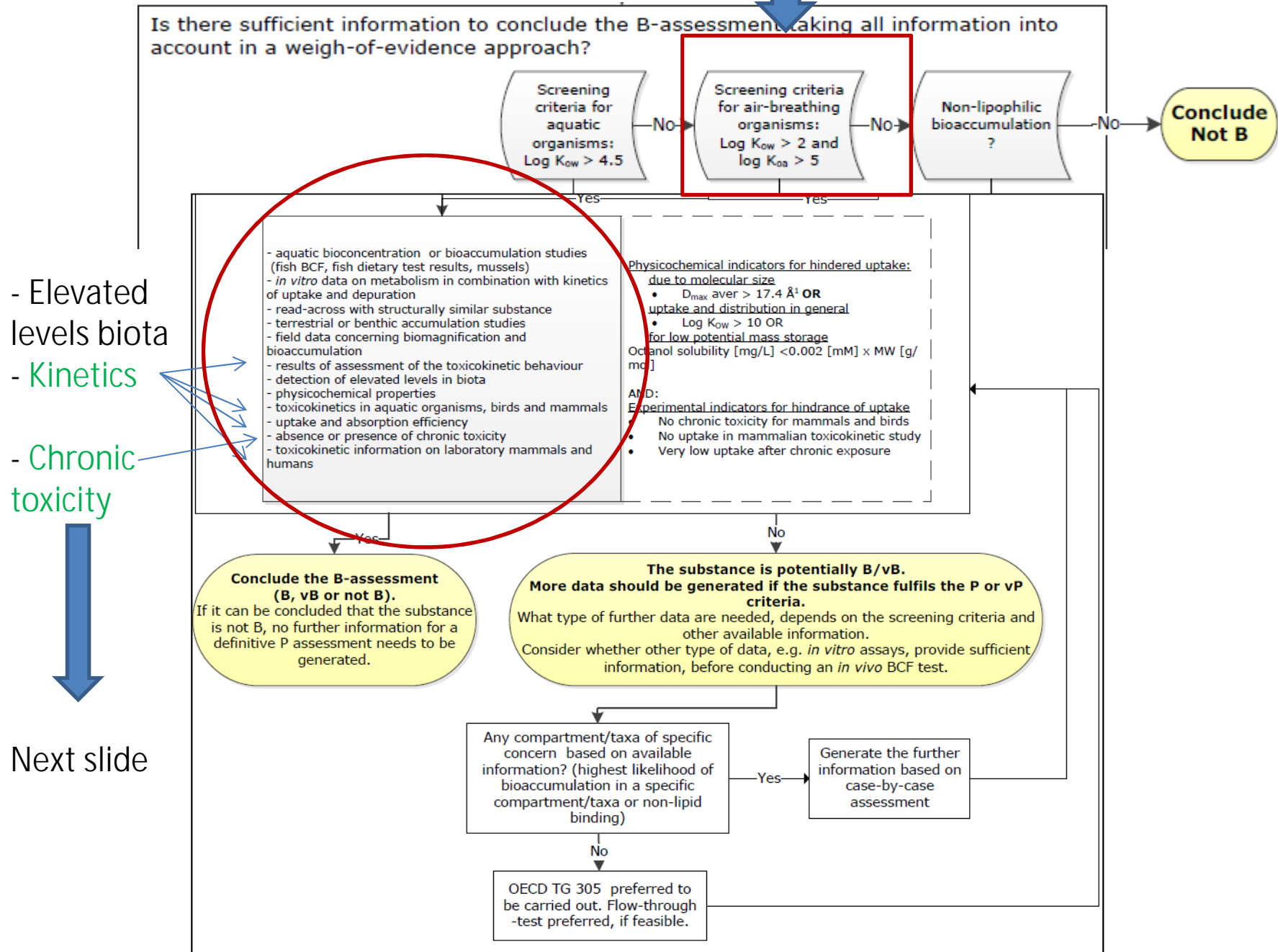
- Screening criteria for the parent and its metabolite
 - $K_{oa} > 5$ (EpiSuite)
 - $\log K_{ow} > 2$ (Measured for the parent, calculated for the metabolite?)

- Parent

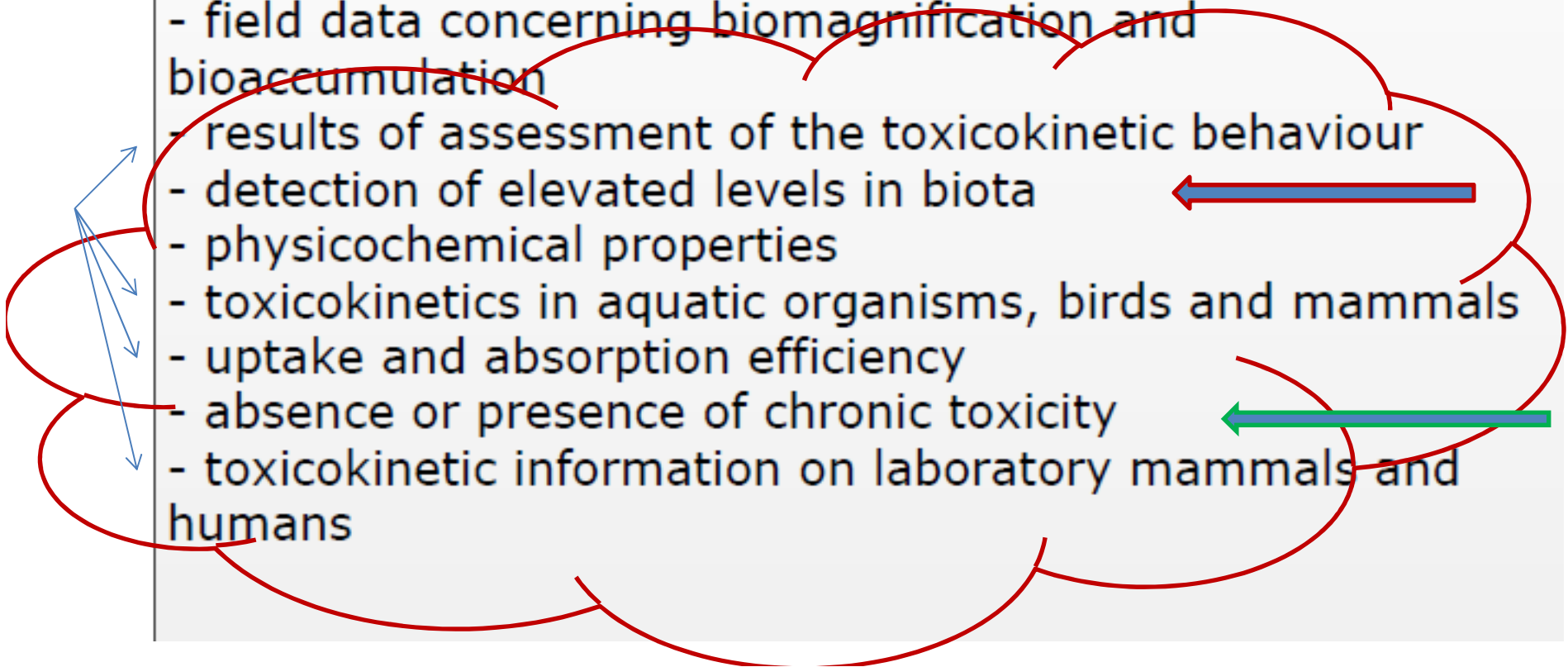
- K_{oa} : 5.4, K_{ow} 3.6
- Metabolite
 - K_{oa} : 6.2 and K_{ow} 2.6



ECHA guidance Figure R.11—4: Integrated assessment and testing strategy for B-assessment.



- aquatic bioconcentration or bioaccumulation studies (fish BCF, fish dietary test results, mussels)
- *in vitro* data on metabolism in combination with kinetics of uptake and depuration
- read-across with structurally similar substance
- terrestrial or benthic accumulation studies
- field data concerning biomagnification and bioaccumulation
- results of assessment of the toxicokinetic behaviour
- detection of elevated levels in biota
- physicochemical properties
- toxicokinetics in aquatic organisms, birds and mammals
- uptake and absorption efficiency
- absence or presence of chronic toxicity
- toxicokinetic information on laboratory mammals and humans



Definitive criteria to assess concern for air-breathers

- Include kinetic information?
 - Can this be theoretical
 - Should this be experimental
- Chronic toxicity: T criteria
 - Secondary poisoning criteria?

Testing strategy after fulfilling screening criteria

- Refine the calculated K_{oa} by measuring this value
- Use other QSAR: Blood-air partition coefficient of Buist et al.
- **ECHA guidance**
 - **Chronic toxicity studies with mammals – this first?**
 - If chronic toxicity studies with mammals are available, the complete absence of effects in the long-term is an indication that the compound is either chronically non-toxic and/or that it is not taken up to a significant extent. Although this is only indirect information on the uptake of a substance, it may be used together with other indicators, e.g. referring to non-testing information, to conclude in a **Weight-of-Evidence approach that a substance is likely to be not B or vB.**
 - **Toxicokinetic studies with mammals – this second?**
 - Theoretical or experimental
- **Does this sufficiently cover other (vertebrate) air breathing organism**

Reach framework Summary and IUCLID fill

- REACH legislation
 - Where do the air breathing organism fit?
 - When to assess?
 - Annex XIII?
 - Hazard for predators?
- ECHA guidance
 - Bioaccumulation – PBT assessment in B section?
 - Direct versus indirect exposure
 - There is a lot of WoE: how and where to present?
- IUCLID
 - Overall Endpoint summary: Chapter 4 Fate assessment?
 - Reference to
 - Bioaccumulation study
 - Kinetic records and/or Endpoint summaries
 - Chronic mammalian toxicity?

Dank voor uw aandacht

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