



National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

Screening for PMT

How to identify PMTs

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Criteria or screening values

- Criteria
 - Criteria facilitate prospective risk assessment
 - Criteria require amendment of REACH legislation
 - Mobility criterion has no defined endpoint
- Screening values
 - Screening values could be lower tier
 - › $\log K_{oc}$ in M assessment comparable to $\log K_{ow}$ in B assessment
- Purpose: Suitable for SVHC (e.g. 57f) or general risk assessment?
 - SVHC is case-by-case assessment
 - › Field data
 - › Mostly retrospective assessment



Developments of alternatives for OECD 305

- *In vitro* metabolism for fish
 - OECD guidelines and guidance document completed in 2018
 - › BCFs more uncertain than BCFs from dietary exposure or minimised test
 - Additional step: Extrapolation from *in vitro* to overall *in vivo* degradation rate
- Bioaccumulation test with *Hyaella azteca*
 - CEFIC-LRI ECO 40 (Fraunhofer)
 - Invertebrate test
 - Aqueous bioconcentration test
 - *In vivo* test
 - Comparable to fish
 - Differences in metabolism (e.g. BaP)



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Persistence

- Persistence criteria for PBT could be applicable
 - Includes screening criteria
 - Little discussion
- Inherent property of PMT: mobile
 - Low sorption
 - High solubility
- Relevant compartment is water
 - › Preferred simulation test is OECD 309





Persistence criteria

- Persistence criteria for surface water defined as:
 - P:
 - › Degradation half-life in freshwater >40 d
 - › Degradation half-life in marine water >60 d
 - vP:
 - › Degradation half-life in fresh and marine water >60 d
- Persistence criteria for soil and sediment defined as:
 - P:
 - › Degradation half-life in soil and freshwater sediment >120 d
 - › Degradation half-life in marine water sediment >180 d
 - vP:
 - › Degradation half-life in soil fresh and marine water sediment >180 d



Mobility

- Endpoint for mobility is not clear
- Mobile substances are characterised by
 - Low adsorption potential (K_{oc}/K_d)
 - High water solubility
- Other parameters: e.g. volatility
- What would be discriminating values for $\log K_{oc}/K_d$ or solubility?
 - UBA proposal:
 - › M: $S \geq 0.15$ mg/L and $\log K_{oc}/D_{oc} \leq 4.0$
 - › vM: $S \geq 0.15$ mg/L and $\log K_{oc}/D_{oc} \leq 3.0$
 - At 12 °C and worst-case of pH 4-9

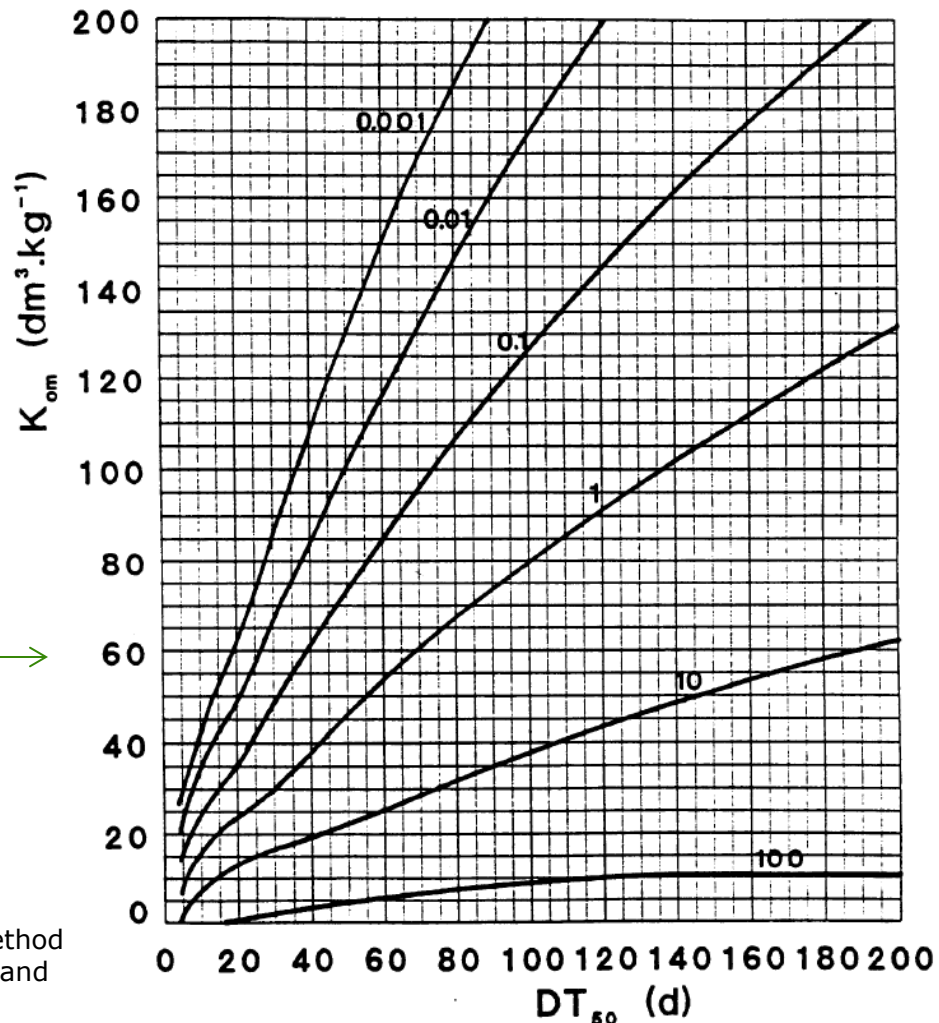


The lines are based on an application rate of 1 kg a.i./ha.

Mobility on its own?

- Mobility and persistence in isolation?
 - Less persistent, highly mobile
 - Very persistent, less mobile
- Combination is used elsewhere:
 - Acceptable application rates for pesticide authorisation

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– Leaching index

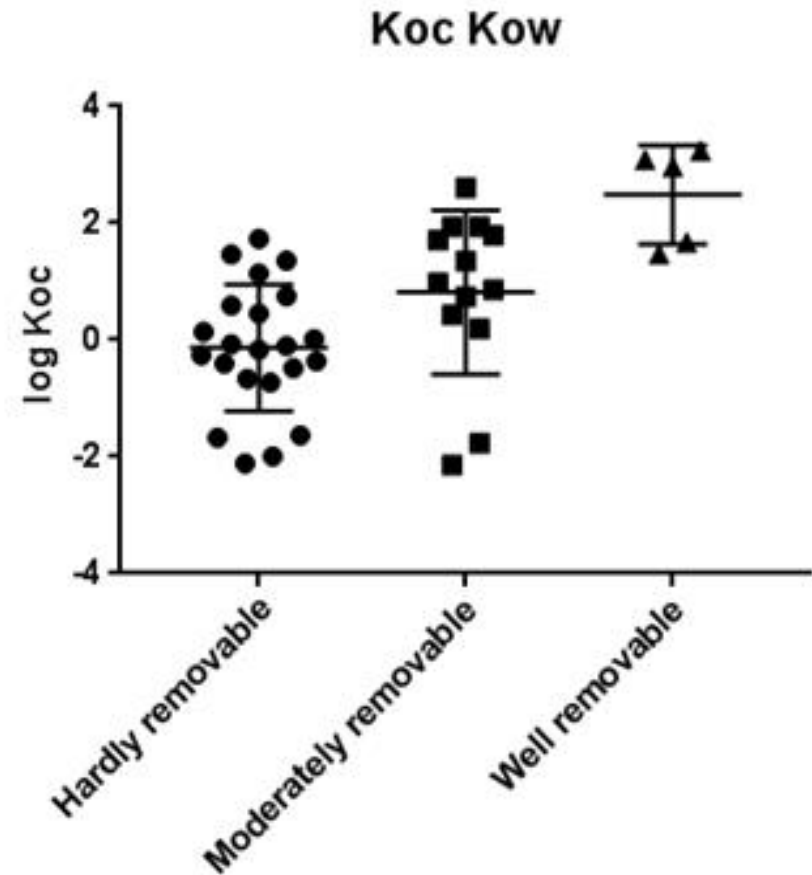


DI Gustafson. 1989. Groundwater ubiquity score: A simple method for assessing pesticide leachability. Environmental Toxicology and Chemistry 8(4):339 – 357.



Mobility and drinking water treatment

- Substances problematic in drinking water preparation
 - All substances:
 - › Maximum $\log K_{oc} \approx 3$
 - Hardly removable:
 - › Maximum $\log K_{oc} \approx 2$





Screening mobility

- Mobility criteria by DE are not very selective
 - EPIWIN QSAR calculations
 - › 69% M, 54% vM
 - › For comparison, 13% B, 7% vB
- Alternative: $M \log K_{oc} \leq 3.0$, $vM \log K_{oc} \leq 2.0$,
 - EPIWIN QSAR calculations
 - › 54% M, 32% vM
 - Similar fractions PM/vPvM as PB/vPvB
 - › Persistence less correlated with mobility than with bioaccumulation



Toxicity

- Values for toxicity least discussed
- For T in PBT:
 - NOEC or EC10 for marine or freshwater organisms $<10 \mu\text{g/L}$
 - Classified as as carcinogenic (category 1A or 1B)
 - Classified as germ cell mutagenic (category 1A or 1B)
 - Classified as toxic for reproduction (category 1A, 1B, or 2)
 - Other chronic toxicity, classified as STOT RE (category 1 or 2)
- DE proposal: additional criteria
 - Classified as as carcinogenic (category 2)
 - Classified as germ cell mutagenic (category 2)
 - Effects on lactation, endocrine disruption
 - Derived-No-Adverse-Effect-Level (DNEL) $\leq 9 \mu\text{g/kg/d}$
 - › (oral, long term, general population)



Toxicity remarks

- Bioaccumulation
 - Lipophilicity -> bioaccumulation -> more toxic
 - Toxicity is related to bioaccumulation
- Mobility
 - Hydrophilicity -> mobility -> less toxic
 - Toxicity is inversely related to mobility
- Higher NOEC or EC10 for marine or freshwater organisms?
- Criteria based on intrinsic toxicity?
 - Body burden



Conclusions

- PMT can be a useful concept
- Two possibilities: criteria or screening values
 - Case-by-case?
 - Prospective or retrospective
- Current criteria/screening values are at the moment tentative
 - P criteria OK
 - Mobility and toxicity need more discussion
 - Combination of mobility and persistence?