

# Testing of chemicals for classification according to REACH and GHS

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## Overview on the presentation

- Classification: IUCLID requirements
- Matching DSD with GHS
- Tests to fulfil both DSD and GHS classification requirements



## Classification: IUCLID requirements



### **IUCLID** section tree, classification

C Related Information
 C Classification and Labelling
 2.1 GHS
 2.1 GHS
 2.2 DSD - DPD
 S Manufacture, use and exposure
 S Toxicological and chemical properties
 S Cotoxicological Information
 S Analytical methods
 S 11 Guidance on safe use
 12 Literature search
 S 13 Assessment Reports

#### GHS:

Classification according to the Guidance to Regulation (EC) No 1272/2008 on classification, labelling and packaging (CLP) of substances and mixtures

#### DSD-DPD:

Classification according to Directives 67/548/EWG ("Dangerous Substances Directive", DSD) and 1999/45/EG ("Dangerous Preparations Directive", DPD)



## **IUCLID** classification GHS

Classification ——			
Physical hazards —			
		Hazard statement	Reason for no classification
Explosives	٩ 🗸		r conclusive but not sufficient for classification
Flammable gases	٩, 🗸	۵. او	r conclusive but not sufficient for classification
Flammable aerosols	٩, 🔻	Q.	conclusive but not sufficient for classification
Oxidising gases	٩, 🔻	Q.	conclusive but not sufficient for classification
Gases under pressure	٩, 🔻	٩, ١	conclusive but not sufficient for classification
Flammable liquids	Flam. Liquid 3 🔍 🔍 🗨	H226: Flammable liquid and vapour.	۹. ۲
Flammable solids	٩, 🔻	٩, ١	conclusive but not sufficient for classification
Self-reactive substances and mixtures	٩ 🗸	٩, [	Pick list
Pyrophoric liquids	٩, 🔽	٩	
Pyrophoric solids	٩, 🔽	٩.	data lacking
Self-heating substances	٩, 🗸	٩, ٦	inconclusive
and mixtures			conclusive but not sufficient for classification
Substances and mixtures which in contact with water emit flammable gases	<u></u> ♥	Q	
Oxidising liquids	٩, 🔻	۵. او	
Oxidising solids	۹. 🖵	٩.	
Organic peroxides	۹ 🗸	٩.	
Corrosive to metals	٩, ◄	(a)	conclusive but not sufficient for classification



## **IUCLID** classification DSD-DPD

Classification ——		
	Classification	Reason for no classification
Explosiveness		conclusive but not sufficient for classification
Oxidising properties	▼	conclusive but not sufficient for classification $\blacksquare$
Flammability	▼	conclusive but not sufficient for classification $\$
Thermal stability	▼	conclusive but not sufficient for classification $\P$
Acute toxicity		conclusive but not sufficient for classification
Acute toxicity - irreversible damage after single exposure	Xn; R68/21/22 Harmful; Harmful: possible risk of irreversible effects in contact with skin and if swallowed	<ul> <li>Image: A start of the start</li></ul>
Repeated dose toxicity		conclusive but not sufficient for classification
Irritation / Corrosion	▼	conclusive but not sufficient for classification $\$
Sensitisation		conclusive but not sufficient for classification $\$
Carcinogenicity	۵. ا	conclusive but not sufficient for classification $\P$
Mutagenicity - Genetic Toxicity	۵. ا	conclusive but not sufficient for classification
Toxicity to reproduction - fertility		conclusive but not sufficient for classification
Toxicity to reproduction - development		data lacking 🔍 🗨
Toxicity to reproduction - breastfed babies		data lacking 🔍 🗨
Environment	▼	conclusive but not sufficient for classification $\P$
Labelling		
Information		



## Basis for classification according to DSD-DPD

Explosiveness Oxidising properties Flammability Thermal stability Acute toxicity Acute toxicity - irreversible damage after single exposure Repeated toxicity Irritation/Corrosion Sensitisation Carcinogenicity Mutagenicity - genetic toxicity Toxicity to reproduction-development Toxicity to reproduction-breastfed babies Environment



## Basis for classification according to GHS

Explosives	Acute toxicity - oral
Flammable gases	Acute toxicity - dermal
Flammable aerosols	Acute toxicity - inhalation
Oxidising gases	Skin corrosion / irritation
Gases under pressure	Serious eye damage / eye irritation
Flammable liquids	Respiratory sensitisation
Flammable solids	Skin sensitisation
Self-reactive substances and mixtures	Aspiration hazards
Pyrophoric liquids	Reproductive toxicity
Pyrophoric solids	Effects on or via lactation
Self-heating substances and mixtures	Germ cell mutagenicity
Substances and mixtures which in contact with water emit flammable gases	Carcinogenicity
Oxidising liquids	Specific organ toxicity - single
Oxidising solids	Specific organ toxicity - repeated
Organic peroxides	Hazardous to the aquatic environment
Corrosive to metals	Hazardous to the atmospheric environment



## Matching DSD with GHS



#### Classification on the basis of physicochemical properties (1)

<b>DSD-DPD</b> Explosiveness	GHS Explosives
Oxidising properties	Oxidising gases Oxidising liquids Oxidising solids Organic peroxides
Flammability	Flammable gases Flammable aerosols Flammable liquids Flammable solids Substances and mixtures which in contact with water emit flammable gases Pyrophoric liquids Pyrophoric solids Self-heating substances and mixtures



#### Classification on the basis of physicochemical properties (2)

DSD-DPD	GHS
Thermal stability	Self-reactive substances and mixtures
-	Gases under pressure
-	Corrosive to metals



#### Classification on the basis of toxicological properties

<b>DSD-DPD</b> Acute toxicity	<b>GHS</b> Acute toxicity - oral Acute toxicity - dermal Acute toxicity - inhalation Aspiration hazards
Acute toxicity - irreversible damage after single exposure	Specific organ toxicity - single
Repeated toxicity	Specific organ toxicity - repeated
Irritation/Corrosion	Skin corrosion / irritation Serious eye damage / eye irritation
Sensitisation	Respiratory sensitisation Skin sensitisation



## Classification on the basis of specific effects to human health

#### **DSD-DPD**

Carcinogenicity

Mutagenicity - genetic toxicity

Toxicity to reproduction-development

Toxicity to reproduction-breastfed babies

#### GHS

Carcinogenicity

Germ cell mutagenicity

Reproductive toxicity

Effects on or via lactation



#### Classification on the basis of environmental effects

#### DSD-DPD

Environment

GHS

Hazardous to the aquatic environment Hazardous to the atmospheric environment



## Tests to fulfil both DSD and GHS classification requirements



## **Data Analysis**

#### **Collection and compilation of existing data**

- Own data (clarification of data ownership)
- Data sources, databases
   See Guidance on information requirements and chemical safety assessment, Chapter R.3: Information gathering
- Data from SIEF participants
- Data from chemically related substances (grouping, read-across)

Requires **expertise** to interpret the data.

For studies not in the public domain there is the requirement to demonstrate **legal title** to the information in order to protect intellectual property rights of the data owner.



## Data Reliability, examples

Values for **physico-chemical properties** taken from **MSDS**'s and all other company technical data can only be assigned a reliability rating of "4", unless detailed information is available. <sup>a)</sup>

Values obtained from "peer reviewed" data: reliability score = "2" a)

The maximum reliability score for **read-across** is **"2".** <sup>b)</sup>

- a) ECHA Practical Guide 2: How to report weight of evidence
- b) ECHA Practical Guide 6: How to report read-across and categories



### Guidelines

Good Laboratory Practice (GLP) **mandatory** for toxicological and ecotoxicological testing, **not mandatory** for physico-chemical testing => not compliant with other regulations or with non-EU member states

Council regulation (EC) No 440/2008 from 30 May 2008 http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri= OJ:L:2008:142:0001:0739:EN:PDF

OECD methods (Section 4: Health effects) may be used in some cases http://titania.sourceoecd.org/vl=14974079/cl=11/nw=1/rpsv/periodical/p15\_ about.htm?jnlissn=1607310x

UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria



## Physicochemical properties (1)

Classification criteria (GHS)	Test methods	Endpoint REACH Annex VII
Explosives	DSC, Test Series 1	7.11
Oxidising gases	ISO 10156	7.13
Oxidising liquids	A.21, UN-O.2	7.13
Oxidising solids	UN-O.1	7.13
Organic peroxides	chemical structure	-
	UN methods, Part II, Sect. 28	
Flammable gases	flammable range with air at 20 $^{ m C}$	7.9, 7.10
Flammable aerosols	contains flammable liquids, gases or solids	7.9, 7.10
Flammable liquids	A.9, A.12/A.13	7.9, 7.10
Flammable solids	A.10, A.12/A.13	7.9, 7.10
Substances and mixtures which in contact with water emit flammable gases	A.12, N.5	7.9, 7.10



## Physicochemical properties (2)

Classification criteria (GHS)	Test methods	Endpoint REACH Annex VII
Pyrophoric liquids	A.13, N.3	7.12
Pyrophoric solids	A.13, N.2	7.12
Self-heating substances and mixtures	N.4	~ 7.12
Self-reactive substances and mixtures	UN methods, Part II, Sect. 28	-
Gases under pressure	>200 kPa or liquefied	-
	pure gases: see UN Recommendations on the Transport of Dangerous Goods, Model Regulations	
Corrosive to metals	C.1	-



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## Toxicological properties (1)

Test methods: OECD, EU	Endpoint REACH (Annex, No.)
Acute toxicity,	VII, 8.5.1
Viscosity	VIII, 8.5.2, 8.5.3
	IX, 7.17
Acute toxicity	VII, 8.5.1
	VIII, 8.5.2, 8.5.3
Repeated dose toxicity	VIII, 8.6.1
	IX, 8.6.2
	X, 8.6.3/4
In vitro and in vivo studies	VII / VIII, 8.1
In vitro and in vivo studies	VII / VIII, 8.2
-	-
Skin sensitisation studies	VII, 8.3
	Test methods: OECD, EU   Acute toxicity,   Viscosity   Acute toxicity Repeated dose toxicity In vitro and in vivo studies In vitro and in vivo studies Skin sensitisation studies



## Test dependencies

#### example for toxicological properties





## Toxicological properties (2)

Classification criteria (GHS)	Test methods: OECD, EU	Endpoint REACH (Annex, No.)
Carcinogenicity	Mutagenicity studies,	VII, 8.4.1
	Carcinogenicity studies	VIII, 8.4.2, 8.4.3
		IX, 8.4
		X, 8.9.1
Germ cell mutagenicity	Mutagenicity studies,	VII, 8.4.1
	(Developmental toxicity)	VIII, 8.4.2, 8.4.3
		IX, 8.4
		X, 8.9.1
		(IX, 8.7.2)
Reproductive toxicity	Screening tests,	VIII, 8.7.1
	Developmental toxicity,	IX / X, 8.7.2, 8.7.3
	Reproduction toxicity	
Effects on or via lactation	(Screening tests)	(VIII, 8.7.1)
	Reproduction toxicity	IX / X, 8.7.3



## **Ecotoxicological properties**

Classification criteria (GHS)	Test methods: OECD, EU	Endpoint REACH (Annex, No.)
Hazardous to the aquatic environment	Acute toxicity tests on aquatic	VII, 7.6, 7.7, 7.8,
	organisms	9.1.1, 9.1.2, 9.2.1.1
	Long-term studies on aquatic	VIII, 9.1.3, 9.1.4.
	organisms	9.2.2.1, 9.3.1
	Surface tension	IX, 7.16, 9.2.1.2,
	Partition coefficient n-octanol/water	9.3.2
	Dissociation constant	
	Water solubility	
	Biodegradability	
	Adsorption/desorption studies	
	Bioaccumulation studies	
Hazardous to the atmospheric environment	-	



## Seibersdorf Labor GmbH Vienna is very near – and so are we

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## Reliability of data (Klimisch et al.)

**1 = reliable without restrictions**: "studies or data...generated according to generally valid and/or internationally accepted testing guidelines (preferably performed according to GLP) or in which the test parameters documented are based on a specific (national) testing guideline...or in which all parameters described are closely related/comparable to a guideline method."

**2 = reliable with restrictions:** "studies or data...(mostly not performed according to GLP), in which the test parameters documented do not totally comply with the specific testing guideline, but are sufficient to accept the data or in which investigations are described which cannot be subsumed under a testing guideline, but which are nevertheless well documented and scientifically acceptable."

**3 = not reliable**: "studies or data...in which there were interferences between the measuring system and the test substance or in which organisms/test systems were used which are not relevant in relation to the exposure (e.g., unphysiologic pathways of application) or which were carried out or generated according to a method which is not acceptable, the documentation of which is not sufficient for assessment and which is not convincing for an expert judgment."

**4 = not assignable**: "studies or data....which do not give sufficient experimental details and which are only listed in short abstracts or secondary literature (books, reviews, etc.)."

Klimisch HJ, Andreae M, Tillmann U (1997): A Systematic Approach for Evaluating the Quality of Experimental Toxicological and Ecotoxicological Data. Regul. Toxicol. Pharmacol. 25, 1-5