

Helsinki, 14 October 2022

Addressees

Registrant(s) of DMCD_94-60-0_SIEF as listed in Appendix 3 of this decision

Date of submission of the dossier subject to this decision

19/02/2019

Registered substance subject to this decision ("the Substance")

Substance name: Dimethyl cyclohexane-1,4-dicarboxylate

EC number: 202-347-5

Decision number: Please refer to the REACH-IT message which delivered this communication (in format CCH-D-XXXXXXXXXX-XX-XX/F)**DECISION ON A COMPLIANCE CHECK**

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below, by the deadline of **21 July 2025**.

Requested information must be generated using the Substance unless otherwise specified.

Information required from all the Registrants subject to Annex VII of REACH

1. Skin sensitisation (Annex VII, Section 8.3.)
 - i. in vitro/in chemico skin sensitisation information on molecular interactions with skin proteins (OECD TG 442C), inflammatory response in keratinocytes (OECD TG 442D) and activation of dendritic cells (EU B.71/OECD TG 442E)(Annex VII, Section 8.3.1.); and
 - ii. Only if the in vitro/in chemico test methods specified under point 1. i.) are not applicable for the Substance or the results obtained are not adequate for classification and risk assessment, in vivo skin sensitisation (Annex VII, Section 8.3.2.; test method: EU B.42./OECD TG 429);

Information required from all the Registrants subject to Annex VIII of REACH

2. In vivo mammalian alkaline comet assay (triggered by Annex VIII, Section 8.4., column 2; test method: OECD TG 489) combined with in vivo mammalian erythrocyte micronucleus test (triggered by Annex VIII, Section 8.4., column 2 test method: OECD TG 474) in rats, or if justified, in mice, oral route. For the comet assay the following tissues shall be analysed: liver, glandular stomach and duodenum
3. Short-term repeated dose toxicity (28 days) (Annex VIII, Section 8.6.1.; test method: EU B.7./OECD 407) by oral route, in rats
4. Short-term toxicity testing on fish (Annex VIII, Section 9.1.3.; test method: EU C.1./OECD TG 203)

The reasons for the decision(s) are explained in Appendix 1.

Information required depends on your tonnage band

You must provide the information listed above for all REACH Annexes applicable to you in accordance with Articles 10(a) and 12(1) of REACH. The addressees of the decision and their corresponding information requirements based on registered tonnage band are listed in Appendix 3.

You are only required to share the costs of information that you must submit to fulfil your information requirements.

How to comply with your information requirements

To comply with your information requirements, you must submit the information requested by this decision in an updated registration dossier by the deadline indicated above. You must also **update the chemical safety report, where** relevant, including any changes to classification and labelling, based on the newly generated information.

Appeal

This decision, when adopted under Article 51 of REACH, may be appealed to the Board of Appeal of ECHA within three months of its notification to you. Please refer to <http://echa.europa.eu/regulations/appeals> for further information.

Failure to comply

If you do not comply with the information required by this decision by the deadline indicated above, ECHA will notify the enforcement authorities of your Member State.

Authorised¹ under the authority of Mike Rasenberg, Director of Hazard Assessment

Appendix 1: Reasons for the decision

Appendix 2: Procedure

Appendix 3: Addressees of the decision and their individual information requirements

Appendix 4: Conducting and reporting new tests under REACH

¹ As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Appendix 1: Reasons for the decision

Contents

0. Reasons common to several requests	4
Reasons related to the information under Annex VII of REACH.....	7
1. Skin sensitisation	7
Reasons related to the information under Annex VIII of REACH	9
2. In vivo mammalian alkaline comet assay combined with in vivo mammalian erythrocyte micronucleus test.....	9
3. Short-term repeated dose toxicity (28 days).....	11
4. Short-term toxicity testing on fish	11
References	13

0. Reasons common to several requests

0.1. Assessment of the read-across approach

1 You have adapted the following standard information requirements by using grouping and read-across approach under Annex XI, Section 1.5:

- Skin sensitisation, (Annex VII, Section 8.3.)
- Short-term repeated dose toxicity (28 day), (Annex VIII, Section 8.6.1.)
- Short-term toxicity testing on fish (Annex VIII, Section 9.1.3.)

2 ECHA has considered the scientific and regulatory validity of your read-across approach(es) in general before assessing the specific standard information requirements in the following sections.

3 Annex XI, Section 1.5. specifies two conditions which must be fulfilled whenever a read-across approach is used. Firstly, there needs to be structural similarity between substances which results in a likelihood that the substances have similar physicochemical, toxicological and ecotoxicological properties so that the substances may be considered as a group or category. Secondly, it is required that the relevant properties of a substance within the group may be predicted from data for reference substance(s) within the group.

4 Additional information on what is necessary when justifying a read-across approach can be found in the Guidance on IRs and CSA, Chapter R.6. and related documents (RAAF, 2017; RAAF UVCB, 2017).

Predictions for toxicological properties

5 You provide no read-across justification document.

6 You predict the properties of the Substance from information obtained from the following source substance(s): cyclohexane-1,4-dicarboxylic acid, EC No. 214-068-6.

Predictions for ecotoxicological properties

7 You predict the short-term toxicity of the Substance to fish from information obtained from the following source substance: 1,4-dimethyl cyclohexane-1,4-dicarboxylate (trans), CAS No. 3399-22-2, i.e. the trans isomer of the Substance.

8 You provide no read-across justification document for ecotoxicological properties either.

9 ECHA understands that your read-across hypothesis is based on the formation of common (bio)transformation products.

10 We have identified the following issue(s) with the prediction(s) of toxicological and ecotoxicological properties:

0.1.1. Absence of read-across documentation

11 Annex XI, Section 1.5 requires that whenever read-across is used, adequate and reliable documentation of the applied method must be provided. Such documentation must include an explanation why the properties of the Substance may be predicted from information on the source substance(s).

12 You have provided robust study summaries for studies conducted with other substances than the Substance in order to comply with the REACH information requirements. However,

you have not provided documentation as to why this information is relevant for the Substance, and why the properties of the Substance may be predicted from information on the source substances.

- 13 In the absence of such documentation, the properties of the Substance cannot be reliably predicted from the data on the source substances.

0.1.1.1. Missing supporting information

- 14 Annex XI, Section 1.5 requires that whenever read-across is used, adequate and reliable documentation of the applied method must be provided. Such documentation must provide supporting information to scientifically justify the read-across explanation for prediction of properties. The set of supporting information should strengthen the rationale for the read-across in allowing to verify the crucial aspects of the read-across hypothesis and establishing that the properties of the Substance can be predicted from the data on the source substance(s) (Guidance on IRs and CSA R.6, Section R.6.2.2.1.f.).

- 15 Supporting information must include toxicokinetic information on the formation of the common compound.

0.1.1.1.1. Missing supporting information on formation of common compounds

- 16 As indicated above, your read-across hypothesis is based on the (bio)transformation of the Substance and of the source substance(s) to a common compound(s). In this context, information characterising the rate and extent of the (bio)transformation of the Substance and of the source substance(s) is necessary to confirm the formation of the proposed common (bio)transformation product and to assess the impact of the exposure to the parent compounds.

- 17 However, you have not provided any experimental information, neither about the (bio)transformation of the Substance nor the source substance(s) to support your claims regarding formation of a common compound.

- 18 In the absence of this information, you have not provided supporting evidence establishing that the proposed common (bio)transformation product is formed as assumed in your read-across hypothesis. Therefore, you have not provided sufficient supporting information to scientifically justify your read-across hypothesis.

0.1.1.1.2. Missing supporting information on formation of non-common compounds

- 19 As indicated above, your read-across hypothesis is based on the (bio)transformation of the Substance and of the source substance(s) to a common compound(s). In this context, exposure to the Substance and of the source substance(s) may also lead to exposure to other compounds than the common compound of interest. The impact of exposure to these non-common compounds on the prediction of properties of the target needs to be assessed to ensure that a reliable prediction can be made.

- 20 The non-common compounds include e.g. the unmetabolised Substance, the monohydrolysis product, and methanol.

- 21 You have not provided neither a justification nor information characterising the exposure to the non-common compounds resulting from exposure to the Substance and to the source substance(s). No experimental data or other adequate and reliable information addressing the impact of exposure to these non-common compounds is included in your read-across approach.

- 22 In the absence of such information, you have not established that a reliable prediction of the property under consideration of the Substance can be derived on the basis of your read-

across hypothesis. Therefore, you have not provided sufficient supporting information to scientifically justify the read-across.

0.1.1.2. Inadequate or unreliable source study/studies

23 According to Annex XI, Section 1.5., if the grouping concept is applied then in all cases the results to be read across must:

- (1) be adequate for the purpose of classification and labelling and/or risk assessment;
- (2) have adequate and reliable coverage of the key parameters addressed in the corresponding study that shall normally be performed for a particular information requirement;

24 Specific reasons why the studies on the source substance(s) do not meet these criteria are explained further below under the applicable information requirement sections 1 and 3. Therefore, no reliable predictions can be made for these information requirements.

Conclusion on the read-across approach

25 For the reasons above, you have not established that relevant properties of the Substance can be predicted from data on the source substance(s). Your read-across approach under Annex XI, Section 1.5. is rejected.

Reasons related to the information under Annex VII of REACH

1. Skin sensitisation

26 Skin sensitisation is an information requirement under Annex VII, Section 8.3. Under Section 8.3., Column 1, the registrants must submit information allowing (1) a conclusion whether the substance is a skin sensitizer and (2) whether it can be presumed to have the potential to produce significant sensitisation in humans (Cat. 1A).

1.1. Information provided

27 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

- (i) An in vivo Kodak Footpad/ Freund's complete adjuvant method (1987) with the source substance, EC 214-068-6.

1.2. Assessment of the information provided

1.2.1. Assessment whether the Substance causes skin sensitisation

1.2.1.1. Read-across adaptation rejected

28 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5 is rejected.

1.2.1.2. Inadequate or unreliable study/studies on the source substance(s)

29 Under Annex XI, Section 1.5., the results to be read across must have a reliable coverage of the key parameters specified in the test guideline for the corresponding study that shall normally be performed for a particular information requirement, in this case OECD TG 406. Therefore, the following specifications must be met:

- a) description of exposure conditions;
- b) a dose level selection rationale is provided;
- c) the induction concentration is the highest causing mild-to-moderate irritation to the skin;
- d) the challenge dose is the highest non-irritation concentration;
- e) positive control is included to establish the sensitivity and reliability of the experimental technique.

30 The study (i) is described as a Kodak Footpad method. Although the method used is not a guideline method (OECD or EU) due to the use of adjuvant in induction, it closely relates to Guinea Pig Maximization Test (EU Method B.6/OECD TG 406).

31 However, the following specifications are not according to the requirements of OECD TG 406:

- a) no details on exposure conditions were provided e.g. route of exposure, how many induction and challenge exposures there were and on which day(s);
- b) no dose level selection rationale was provided;
- c) the concentration used for induction was not specified and whether it caused mild-to-moderate irritation;
- d) the challenge concentration was not specified and whether it was the highest non-irritating concentration;

e) no information on positive control group was provided.

32 The information provided does not cover the key parameter(s) required by OECD TG 406 and does not allow to make a conclusion whether the Substance causes skin sensitisation.

33 Therefore, the study submitted in your adaptation, as currently reported in your dossier, does not provide a reliable coverage of the key parameter(s) of the corresponding OECD TG.

1.2.2. No assessment of potency

34 To be considered compliant and enable a conclusion in cases where the substance is considered to cause skin sensitisation, the information provided must also allow a conclusion whether it can be presumed to have the potential to produce significant sensitisation in humans (Cat. 1A).

35 As the currently available data does not allow to conclude whether the Substance causes skin sensitisation (see section 1.2.1 above), this condition cannot be assessed.

36 On this basis, the information requirement is not fulfilled.

1.3. Specification of the study design

37 To fulfil the information requirement for the Substance, information on molecular interaction with skin proteins and inflammatory response in keratinocytes and activation of dendritic cells (OECD TG 442C and OECD TG 442D and EU B.71/OECD TG 442E) must be provided. Furthermore an appropriate risk assessment is required if a classification of the Substance as a skin sensitiser (Cat 1A or 1B) is warranted.

38 In case no conclusion on the skin sensitisation potency can be made for the Substance based on the existing data or newly generated in vitro/in chemico data, in vivo skin sensitisation study must be performed and the murine local lymph node assay (EU Method B.42/OECD TG 429) is considered as the appropriate study for the potency estimation.

Reasons related to the information under Annex VIII of REACH**2. In vivo mammalian alkaline comet assay combined with in vivo mammalian erythrocyte micronucleus test**

39 Appropriate in vivo mutagenicity studies must be considered under Annex VIII, Section 8.4., Column 2 in case of a positive result in any of the in vitro genotoxicity studies under Annex VII or VIII.

2.1. Triggering of the information requirement

40 Your dossier contains positive results for the in vitro cytogenicity tests (study i) and in vitro gene mutation study in mammalian cells (study ii) which raise the concerns for gene mutations and chromosomal aberrations:

(ii) In vitro cytogenicity study, TG 473, 2016, with the Substance;

(iii) In vitro mammalian cell gene mutation study, TG 476, 2016, with the Substance.

41 In the genetic toxicity endpoint summary you conclude: "DMCD was positive in mammalian chromosome aberration and mutagenicity studies with metabolic activation".

42 ECHA agrees with your conclusion that the results of studies (i) and (ii) are positive.

43 Moreover, under the genetic toxicity endpoint summary you claim that "Dimethyl -1,4-cyclohexanedicarboxylate (DMCD) was shown to be non-mutagenic in bacterial and mammalian cell assays without metabolic activation [...]. Based upon these findings, DMCD does not satisfy the criteria for classification according to EU Classification, Labelling and Packaging of Substances and Mixtures (CLP) Regulation (EC) No. 1272/2008 or UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS)."

44 However, negative results without metabolic activation does not overrule or replace positive results with metabolic activation and classification is not part of the legal rule and therefore it can not be used to waive this information requirement.

45 Therefore, the information requirement is triggered.

*2.2. Assessment of the information provided**2.2.1. No in vivo study provided*

46 The Guidance on IRs and CSA, Section R.7.7.6.3 states that following a positive result in an in vitro test, "adequately conducted somatic cell in vivo testing is required to ascertain if this potential can be expressed in vivo. In cases where it can be sufficiently deduced that a positive in vitro finding is not relevant for in vivo situations (e.g. due to the effect of the test substances on pH or cell viability, in vitro-specific metabolism: see also Section R.7.7.4.1), or where a clear threshold mechanism coming into play only at high concentrations that will not be reached in vivo has been identified (e.g. damage to non-DNA targets at high concentrations), in vivo testing will not be necessary."

47 However, no data from an in vivo somatic cell genotoxicity study is available in the dossier. Moreover, you did not provide any considerations explaining that the genotoxic potential of the substance cannot be expressed in vivo, based e.g. on lack of relevance for in vivo situations or the existence of threshold mechanism.

48 ECHA considers that an appropriate in vivo follow up genetic toxicity study is necessary to address the concern(s) identified in vitro.

2.3. Test selection

49 The positive in vitro results available in the dossier indicate a concern for both chromosomal aberration and gene mutation.

50 The in vivo mammalian erythrocyte micronucleus test ("MN test", OECD TG 474) and the in vivo mammalian alkaline comet assay ("comet assay", OECD TG 489) can be combined in a single study (see OECD TG 474 paragraph 37c; OECD TG 489 paragraph 33; Guidance on IRs & CSA, Section R.7.7.6.3). While the MN test can detect both structural chromosomal aberrations (clastogenicity) and numerical chromosomal aberrations (aneuploidy), the comet assay can detect primary DNA damage that may lead to gene mutations and/or structural chromosomal aberrations. A combined study will thus address both the identified concerns for chromosomal aberration as well as gene mutation.

51 The combined study, together with the results of the in vitro mutagenicity studies, can be used to make definitive conclusions about the mechanism(s) inducing in vivo mutagenicity and lack thereof. Furthermore, the combined study can help reduce the number of tests performed and the number of animals used while addressing (structural and numerical) chromosomal aberrations as well as gene mutations.

52 Therefore, the comet assay combined with the MN test is the most appropriate study for the Substance.

2.4. Specification of the study design

53 According to the test method OECD TG 489, rats are the preferred species. Other rodent species can be used if scientifically justified. According to the test method OECD TG 474, the test may be performed in mice or rats. Therefore, the combined study must be performed in rats, or if justified, in mice.

54 Having considered the anticipated routes of human exposure and adequate exposure of the target tissue(s) performance of the test by the oral route is appropriate.

55 In line with the test method OECD TG 489, the test must be performed by analysing tissues from liver as primary site of xenobiotic metabolism, glandular stomach and duodenum as sites of contact. There are several expected or possible variables between the glandular stomach and the duodenum (different tissue structure and function, different pH conditions, variable physico-chemical properties and fate of the Substance, and probable different local absorption rates of the Substance and its possible breakdown product(s)). In light of these expected or possible variables, it is necessary to analyse both tissues to ensure a sufficient evaluation of the potential for genotoxicity at the site of contact in the gastro-intestinal tract.

56 The combination of the OECD TGs 489 and 474 should not impair the validity of and the results from each individual study. Careful consideration should be given to the dosing, and tissue sampling for the comet analysis alongside the requirements of tissue sampling for the mammalian erythrocyte micronucleus test (see OECD TG 489, e.g. Bowen et al. 2011 [1]).

2.4.1. Germ cells

57 You may consider collecting the male gonadal cells from the seminiferous tubules in addition to the other aforementioned tissues in the comet assay, as it would optimise the use of animals. You can prepare the slides for male gonadal cells and store them for up to 2 months, at room temperature, in dry conditions and protected from light. Following the

generation and analysis of data on somatic cells in the comet assay, you should consider analysing the slides prepared with gonadal cells.

58 This type of evidence may be relevant for the overall assessment of possible germ cell mutagenicity including classification and labelling according to the CLP Regulation.

- [1] Bowen DE et al. (2011) Evaluation of a multi-endpoint assay in rats, combining the bone-marrow micronucleus test, the comet assay and the flow-cytometric peripheral blood micronucleus test. *Muta Res.*;722:7–19.

3. Short-term repeated dose toxicity (28 days)

59 A short-term repeated dose toxicity study (28 days) is an information requirement under Annex VIII, Section 8.6.1.

60 You have adapted this information requirement by using a Grouping of substances and read-across approach based on experimental data from the following substances:

- (i) An in vivo short-term oral study in rats (1988) with the source substance, EC 214-068-6;
- (ii) An in vivo sub-chronic oral study in rats (2006) with the source substance, EC 214-068-6.

3.1. Read-across adaptation rejected

61 As explained in Section 0.1., your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5 is rejected.

62 Based on the above, the information you provided do not fulfil the information requirement.

3.2. Specification of the study design

63 Following the criteria provided in Annex VIII, Section 8.6.1, Column 2, the oral route is the most appropriate route of administration to investigate repeated dose toxicity of the Substance; Guidance on IRs and CSA, Section R.7.5.6.3.1.

64 According to the OECD TG 407, the rat is the preferred species.

65 Therefore, the study must be performed according to the OECD TG 407, in rats and with oral administration of the Substance.

4. Short-term toxicity testing on fish

66 Short-term toxicity testing on fish is an information requirement under Annex VIII to REACH (Section 9.1.3.).

4.1. Information provided

67 You have adapted this information requirement by using a read-across approach based on experimental data from the following substance:

- (i) a study on short-term toxicity to fish (1991) according to test guideline EPA

660/3- 75/009 with 1,4-dimethyl cyclohexane-1,4-dicarboxylate (trans), CAS No. 3399-22-2, i.e. the trans isomer of the Substance.

4.2. Assessment of the information provided

68 We have assessed this information and identified the following issues:

4.2.1. Read-across adaptation rejected

69 As explained in Section 0, your adaptation based on grouping of substances and read-across approach under Annex XI, Section 1.5. is rejected. In addition, ECHA identified endpoint-specific issue(s) addressed below.

4.2.2. The provided study does not meet the information requirement

70 To fulfil the information requirement, a study must comply with OECD TG 203 (Article 13(3) of REACH). Therefore, the following specifications must be met:

71 Validity criteria

- a) the dissolved oxygen concentration is $\geq 60\%$ of the air saturation value in all test vessels throughout the exposure;
- b) the analytical measurement of test concentrations is conducted;

72 Your registration dossier provides a study on short-term toxicity to fish according to test guideline EPA 660/3- 75/009 showing the following:

73 Validity criteria

- a) The concentration of dissolved oxygen is reported to have been between 1.9 and 8.1 mg/L, which, for the test temperature of 24°C, approximately corresponds to between 21% and 95% of the air saturation value. Therefore, the concentration of dissolved oxygen fell down to well below 60% in some test vessels;
- b) no analytical measurement of test concentrations was conducted.

74 Based on the above, the validity criteria of OECD TG 203 are not met

75 Therefore, the requirements of OECD TG 203 are not met.

4.2.3. Conclusion

76 On those bases, the information requirement is not fulfilled.

References

The following documents may have been cited in the decision.

Guidance on information requirements and chemical safety assessment (Guidance on IRs & CSA)

- Chapter R.4 Evaluation of available information; ECHA (2011).
Chapter R.6 QSARs, read-across and grouping; ECHA (2008).
Appendix to Chapter R.6 for nanoforms; ECHA (2019).
Chapter R.7a Endpoint specific guidance, Sections R.7.1 – R.7.7; ECHA (2017).
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).
Chapter R.7b Endpoint specific guidance, Sections R.7.8 – R.7.9; ECHA (2017).
Appendix to Chapter R.7b for nanomaterials; ECHA (2017).
Chapter R.7c Endpoint specific guidance, Sections R.7.10 – R.7.13; (ECHA 2017).
Appendix to Chapter R.7a for nanomaterials; ECHA (2017).
Appendix R.7.13-2 Environmental risk assessment for metals and metal compounds; ECHA (2008).
Chapter R.11 PBT/vPvB assessment; ECHA (2017).
Chapter R.16 Environmental exposure assessment; ECHA (2016).

Guidance on data-sharing; ECHA (2017).

All Guidance on REACH is available online: <https://echa.europa.eu/guidance-documents/guidance-on-reach>

Read-across assessment framework (RAAF)

- RAAF, 2017 Read-across assessment framework (RAAF), ECHA (2017)
RAAF UVCB, 2017 Read-across assessment framework (RAAF) – considerations on multi- constituent substances and UVCBs), ECHA (2017).

The RAAF and related documents are available online:
<https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/grouping-of-substances-and-read-across>

OECD Guidance documents (OECD GDs)

- OECD GD 23 Guidance document on aquatic toxicity testing of difficult substances and mixtures; No. 23 in the OECD series on testing and assessment, OECD (2019).
OECD GD 29 Guidance document on transformation/dissolution of metals and metal compounds in aqueous media; No. 29 in the OECD series on testing and assessment, OECD (2002).
OECD GD 150 Revised guidance document 150 on standardised test guidelines for evaluating chemicals for endocrine disruption; No. 150 in the OECD series on testing and assessment, OECD (2018).
OECD GD 151 Guidance document supporting OECD test guideline 443 on the extended one-generation reproductive toxicity test; No. 151 in the OECD series on testing and assessment, OECD (2013).

Appendix 2: Procedure

This decision does not prevent ECHA from initiating further compliance checks at a later stage on the registrations present.

ECHA followed the procedure detailed in Articles 50 and 51 of REACH.

The compliance check was initiated on 17 November 2021.

ECHA notified you of the draft decision and invited you to provide comments.

ECHA did not receive any comments within the commenting period.

The deadline of the decision is set based on standard practice for carrying out OECD TG tests. It has been exceptionally extended by 12 months from the standard deadline granted by ECHA to take into account currently longer lead times in contract research organisations.

ECHA notified the draft decision to the competent authorities of the Member States for proposals for amendment.

As no amendments were proposed, ECHA adopted the decision under Article 51(3) of REACH.

Appendix 3: Addressees of this decision and their corresponding information requirements

In accordance with Articles 10(a) and 12(1) of REACH, the information requirements for individual registrations are defined as follows:

- the information specified in Annex VII to REACH, for registration at 1-10 tonnes per year (tpa), or as a transported isolated intermediate in quantity above 1000 tpa;
- the information specified in Annexes VII and VIII to REACH, for registration at 10-100 tpa;
- the information specified in Annexes VII, VIII and IX to REACH, for registration at 100-1000 tpa;
- the information specified in Annexes VII to X to REACH, for registration at more than 1000 tpa.

Registrant Name	Registration number	Highest REACH Annex applicable to you
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Where applicable, the name of a third party representative (TPR) may be displayed in the list of recipients whereas ECHA will send the decision to the actual registrant.

Appendix 4: Conducting and reporting new tests for REACH purposes

1. Requirements when conducting and reporting new tests for REACH purposes

1.1. Test methods, GLP requirements and reporting

- (1) Under Article 13(3) of REACH, all new data generated as a result of this decision must be conducted according to the test methods laid down in a European Commission Regulation or to international test methods recognised by the Commission or ECHA as being appropriate.
- (2) Under Article 13(4) of REACH, ecotoxicological and toxicological tests and analyses must be carried out according to the GLP principles (Directive 2004/10/EC) or other international standards recognised by the Commission or ECHA.
- (3) Under Article 10(a)(vi) and (vii) of REACH, all new data generated as a result of this decision must be reported as study summaries, or as robust study summaries, if required under Annex I of REACH. See ECHA Practical Guide on How to report robust study summaries².
- (4) Under the introductory part of Annexes VII/VIII/IX/X to REACH, where a test method offers flexibility in the study design, for example in relation to the choice of dose levels or concentrations, the chosen study design must ensure that the data generated are adequate for hazard identification and risk assessment.

1.2. Test material

Before generating new data, you must agree within the joint submission on the chemical composition of the material to be tested (Test Material) which must be relevant for all the registrants of the Substance.

- (1) Selection of the Test material(s)
The Test Material used to generate the new data must be selected taking into account the following:
 - the variation in compositions reported by all members of the joint submission,
 - the boundary composition(s) of the Substance,
 - the impact of each constituent/ impurity on the test results for the endpoint to be assessed. For example, if a constituent/ impurity of the Substance is known to have an impact on (eco)toxicity, the selected Test Material must contain that constituent/ impurity.
- (2) Information on the Test Material needed in the updated dossier
 - You must report the composition of the Test Material selected for each study, under the "Test material information" section, for each respective endpoint study record in IUCLID.
 - The reported composition must include all constituents of each Test Material and their concentration values and other parameters relevant for the property to be tested.

This information is needed to assess whether the Test Material is relevant for the Substance and whether it is suitable for use by all members of the joint submission.

Technical instructions on how to report the above is available in the manual on How to prepare registration and PPORD dossiers³.

² <https://echa.europa.eu/practical-guides>

³ <https://echa.europa.eu/manuals>