CLH report

Proposal for Harmonised Classification and Labelling

Based on Regulation (EC) No 1272/2008 (CLP Regulation), Annex VI, Part 2

International Chemical Identification: 1H-Benzotriazole

EC Number: 202-394-1

CAS Number: 95-14-7

Index Number:

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BAuA

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1 IDENTITY OF THE SUBSTANCE

1.1 Name and other identifiers of the substance

Table 1: Substance identity and information related to molecular and structural formula of the substance

Name(s) in the IUPAC nomenclature or other international chemical name(s)	1H-benzotriazole
Other names (usual name, trade name, abbreviation)	Benzotriazole BTA
ISO common name (if available and appropriate)	-
EC number (if available and appropriate)	202-394-1
EC name (if available and appropriate)	1H-benzotriazole
CAS number (if available)	95-14-7
Other identity code (if available)	-
Molecular formula	C6H5N3
Structural formula	
SMILES notation (if available)	N1N=NC2=C1C=CC=C2
Molecular weight or molecular weight range	119.13 g/mol

1.2 Composition of the substance

Table 2: Constituents (non-confidential information)

Constituent (Name and numerical identifier)	Concentration range (% w/w minimum and maximum in multi- constituent substances)	Current CLH in Annex VI Table 3.1 (CLP)	Current self- classification and labelling (CLP)
1H-benzotriazole	> 99	-	

Table 3: Impurities (non-confidential information) if relevant for the classification of the substance

Impurity (Name and numerical identifier)	Concentration range (% w/w minimum and maximum)	Current CLH in Annex VI Table 3.1 (CLP)	Current self- classification and labelling (CLP)	The impurity contributes to the classification and labelling
-				

Table 4: Additives (non-confidential information) if relevant for the classification of the substance

Additive (Name and numerical identifier)	Function	Concentration range (% w/w minimum and maximum)	Current CLH in Annex VI Table 3.1 (CLP)	Current self- classification and labelling (CLP)	The additive contributes to the classification and labelling
-					

Table 5: Test substances (non-confidential information) (this table is optional)

Identification of test substance	Purity	Impurities and additives (identity, %, classification if available)	Other information	The study(ies) in which the test substance is used
-				

2 PROPOSED HARMONISED CLASSIFICATION AND LABELLING

2.1 Proposed harmonised classification and labelling according to the CLP criteria

Table 6: Proposed harmonised classification and labelling according to the CLP criteria

					Classifi	cation		Labelling			
	Index No	International Chemical Identification	EC No	CAS No	Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)	Specific Conc. Limits, M-factors	Notes
Current						no entry					
Annex VI entry											
Dossier submitters proposal					Aquatic Chronic 2	H411	GHS09 Wng	H411			
Resulting Annex VI entry if agreed by RAC and COM	tba	1H-benzotriazole	202-394-1	95-14-7	Aquatic Chronic 2	H411	GHS09 Wng	H411			

Table 7: Reason for not proposing harmonised classification and status under public consultation

Hazard class	Reason for no classification	Within the scope of public consultation
Explosives		
Flammable gases (including chemically unstable gases)	-	
Oxidising gases		
Gases under pressure		
Flammable liquids		
Flammable solids	1	
Self-reactive substances	1	
Pyrophoric liquids		
Pyrophoric solids		
Self-heating substances	1	
Substances which in contact with water emit flammable gases		
Oxidising liquids	1	
Oxidising solids	1	
Organic peroxides		
Corrosive to metals	hazard class not assessed in this dossier	No
Acute toxicity via oral route		
Acute toxicity via dermal route		
Acute toxicity via inhalation route		
Skin corrosion/irritation		
Serious eye damage/eye irritation		
Respiratory sensitisation		
Skin sensitisation	-	
Germ cell mutagenicity	1	
Carcinogenicity	1	
Reproductive toxicity	1	
Specific target organ toxicity- single exposure		
Specific target organ toxicity-	1	
repeated exposure Aspiration hazard	-	
Hazardous to the aquatic environment	harmonised classification proposed	Yes
Hazardous to the ozone layer	hazard class not assessed in this dossier	No

3 HISTORY OF THE PREVIOUS CLASSIFICATION AND LABELLING

1H-benzotriazole is not listed in Annex VI of Regulation (EC) No. 1272/2008. There are 40 aggregated notifications on 1H-benzotriazole. All of them are shown in Table 8.

 Table 8: Overview of self-classification and labelling based on the CLP Regulation criteria (retrieved from

 https://echa.europa.eu/de/information-on-chemicals/cl-inventory-database/-/discli/details/36314 on the 22.07.2021)

Classificatio	n		Labelling		Number of Notifiers
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)	
Acute Tox. 4	H302	H302		GHS07	210 (Joint
Eye Irrit. 2	H319	H319		GHS09	entry)
Aquatic Chronic 2	H411	H411		Wng	
Skin Irrit. 2	H315	H315		GHS07	2 (Joint
Eye Irrit. 2A	H319	H319		Wng	entry)
Acute Tox. 4	H302	H302		GHS07	447
Eye Irrit. 2	H319	H319		Wng	
Acute Tox. 4	H302	H302		GHS07	374
Eye Irrit. 2	H319	H319		Wng	
Acute Tox. 4	H332	H332			
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07 Wng	148
Acute Tox. 4	H302	H302		GHS07	89
Acute Tox. 4	H312	H312		Wng	
Eye Irrit. 2	H319	H319			
Acute Tox. 4	H332	H332			
Aquatic Chronic 3	H412	H412			
Flam. Sol. 1	H228	H228		GHS02	83
Acute Tox. 4	H302	H302		GHS05	
Eye Dam. 1	H318	H318		GHS07	
Acute Tox. 4	H332	H332		Dgr	
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07	63
Eye Irrit. 2	H319	H319		Wng	
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07	62
Eye Irrit. 2	H319	H319		Wng	
Acute Tox. 4	H332	H332		CHEOC	55
Acute Tox. 4	H302 H319	H302		GHS06	55
Eye Irrit. 2 Acute Tox. 2	H319 H330	H319 H330		GHS08	
STOT SE 3	H330 H336	H330 H336		Dgr	
Muta. 2	(Central	11550			
iviula. 2	nervous)				
	H341	H341			
Acute Tox. 4	H302	H302+H332		GHS07	38
Eye Irrit. 2	H302 H319	H319		Wng	20
Acute Tox. 4	H332	H412			
Aquatic Chronic 3	H412				
Not classified					33
Acute Tox. 4	H302	H302		GHS07	26
Acute Tox. 4	H312	H312		Wng	
Eye Irrit. 2	H319	H319		Ċ.	
Aquatic Chronic 3	H412	H412			

Classification	n		Labelling		Number of Notifiers
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)	
Acute Tox. 4	H302	H302		GHS06	22
Eye Irrit. 2	H319	H319		Dgr	
Acute Tox. 2	H330	H330			
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07	22
Acute Tox. 4	H332	H332		Wng	
Aquatic Chronic 3	H412 H301	H412 H301		GHS06	20
Acute Tox. 3 Eye Irrit. 2	H301 H319	H301 H319		Dgr	20
Acute Tox. 4	H319 H332	H319 H332		Dgi	
Acute Tox. 4	H302	H302+H332		GHS09	17
Eye Irrit. 2	H302 H319	H319		GHS07	17
Acute Tox. 4	H332	11017		Wng	
Aquatic Chronic 2	H411	H411		e	
		H302		GHS07 Wng	7
Acute Tox. 4	H302	H302		GHS07	6
Eye Dam. 1	H318	H318		GHS05	
Acute Tox. 4	H332	H332		Dgr	
Acute Tox. 4	H302			GHS07	6
Eye Irrit. 2	H319	H319		Wng	
Acute Tox. 4	H332				
STOT SE 3	H335	H335			
Aquatic Chronic 3	(Respiratory				
	sys) H412	H412			
	11412	H302		GHS07	5
		H302 H319		Wng	5
		H332			
		H412			
Acute Tox. 4	H302	H302		GHS05	3
Eye Dam. 1	H318	H318		GHS07	
Acute Tox. 4	H332	H332		Dgr	
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07	1
Skin Irrit. 2	H315	H315		Wng	
Eye Irrit. 2	H319	H319			
Acute Tox. 4 Aquatic Chronic 3	H332 H412	H332 H412			
Acute Tox. 4	H412 H302	H412 H302		GHS07	1
Acute Tox. 4	H312	H12		Wng	1
Aquatic Chronic 4	H413	H413			
Flam. Sol. 1	H228	H228		GHS02	1
Acute Tox. 4	H302	H302		GHS07	
Eye Irrit. 2	H319	H319		Dgr	
Acute Tox. 4	H332	H332		-	
Aquatic Chronic 3	H412	H412			
Acute Tox. 4	H302	H302		GHS07	1
Eye Irrit. 2	H319	H319		Wng	
Acute Tox. 4	H332	H332			
Aquatic Chronic 3	H412	H412		Der	1
Flam. Sol. 1	H228	H228		Dgr	1
Acute Tox. 4	H302	H302			

Classificati	on		Labelling				
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)			
Eye Irrit. 2	H319	H319					
Acute Tox. 4	H332	H332					
Aquatic Chronic 3	H412	H412					
		H412		GHS06	1		
Acute Tox. 4	H302			Dgr GHS07	1		
Acute Tox. 4 Acute Tox. 4	H302 H332				1		
Acute Tox. 4	H302	H302		Wng GHS07	1		
Acute Tox. 4	H312	H302		Wng	1		
Eye Irrit. 2	H312 H319	H319		w ng			
Aquatic Chronic 3	H412	H412					
riquate entonie 5	11412	H332					
Acute Tox. 4	H302	H302		GHS07	1		
Eye Irrit. 2	H319	110.02		GHS09	-		
Aquatic Chronic 2	H411	H411		Wng			
Acute Tox. 4	H302	H302		GHS07	1		
Acute Tox. 4	H312			Wng			
Eye Irrit. 2	H319	H319					
Acute Tox. 4	H332	H332					
Aquatic Chronic 3	H412	H412					
		H302		Wng	1		
		H302		GHS07			
		H315		Wng			
		H319		C			
		H335					
Acute Tox. 4	H302	H302		GHS07	1		
Acute Tox. 3	H331	H331		GHS06			
				Dgr			
Acute Tox. 4	H302	H302		GHS07	1		
Skin Irrit. 2	H315	H315		Wng			
Eye Irrit. 2	H319	H319					
A	11202	H335		CUICO7	1		
Acute Tox. 4	H302	H302		GHS07	1		
Eye Irrit. 2 Acute Tox. 4	H319 H332	H319 H332		Wng			
Aquatic Chronic 2	H352 H411	П332					
Acute Tox. 4	H302	H302		GHS07	1		
Eye Irrit. 2A	H319	H302 H319		Wng			
Acute Tox. 4	H332	H312					
Aquatic Chronic 3	H412	H412					
Acute Tox. 4	H302			GHS05	1		
Eye Irrit. 2	H319	H318		Dgr			
Acute Tox. 4	H332			-			
Aquatic Chronic 3	H412						
Flam. Sol. 1	H228	H228		GHS02	1		
Acute Tox. 4	H302	H302		GHS07			
Acute Tox. 4	H332	H332		Dgr			
Aquatic Chronic 3	H412	H412					

4 JUSTIFICATION THAT ACTION IS NEEDED AT COMMUNITY LEVEL

According to Article 36(3) of Regulation (EC) No. 1272/2008 a harmonized classification and labelling of a substance is possible even if it does not fall under the provisions of paragraph 1 and 2 of Article 36. Such additions to Annex VI are possible on a case-by-case if justification is provided that there is the need for such action at community level. According to the "Guidance on the preparation of CLH dossiers" such justification is inter alia given if

- "differences in self-classification between different notifiers in the C&L Inventory and/or between different registration dossiers are discovered, and notifiers are not able to agree;"
- "the dossier submitter disagrees with the current self-classification by the notifiers and/or registrants".

Table 8 clearly shows that the first mentioned justification is given for 1H-benzotriazole. Furthermore, there are self-classifications and labellings in Table 8 that have no or a lower classification and labelling with regard to aquatic toxicity. The dossier submitters do not agree with these entries.

5 IDENTIFIED USES

According to the registration dossier 1H-benzotriazole is used in all applications listed in Table 9.

Life cycle step	description of the use	chemical product category or Article category	Environmental release category
Formulation			
<i>a</i>)	Manufacturing of cleaning and maintenance products		ERC 2: Formulation of preparations
<i>b)</i>	Industrial Formulation of lubricant additives, lubricants and greases	PC 24: Lubricants, greases, release products	ERC 2: Formulation of preparations
<i>c)</i>	Formulation of coolant mixtures	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products	ERC 2: Formulation of preparations
<i>d</i>)	Formulation/blending	PC 0: Other: n/a	ERC 2: Formulation of preparations
<i>e)</i>	Manufacturing of cleaning and maintenance products	PC 35: Washing and cleaning products (including solvent based products)	ERC 2: Formulation of preparations
Uses at indu	strial sites		
<i>a)</i>	Industrial use of Food beverage and pharmacos products	PC 35: Washing and cleaning products (including solvent based products)	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>b)</i>	(Industrial) Use of lubricants and greases in open systems.	PC 24: Lubricants, greases, release products	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>c)</i>	(Industrial) Use of lubricants in high energy open processes	PC 24: Lubricants, greases, release products	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>d</i>)	(Industrial) Handling and dilution of metalworking fluid concentrates	PC 24: Lubricants, greases, release products	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles

Table 9: Identified uses of 1H-benzotriazole

Life cycle step	description of the use	chemical product category or Article category	Environmental release category
e)	General industrial use of lubricants and greases in vehicles or machinery	PC 24: Lubricants, greases, release products	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>f</i>)	Use as metalworking fluid	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>g)</i>	(Industrial) Use of lubricants in open high temperature processes		ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles
<i>h</i>)	Adjuvant in water based formulations	PC 20: Products such as ph- regulators, flocculants, precipitants, neutralisation agents	ERC 7: Industrial use of substances in closed systems
<i>i)</i>	Water treatment Chemical	PC 20: Products such as ph- regulators, flocculants, precipitants, neutralisation agents PC 37: Water treatment chemicals	ERC 4: Industrial use of processing aids in processes and products, not becoming part of articles ERC 7: Industrial use of substances in closed systems
Uses by Proj	fessional Workers	•	· •
<i>a</i>)	(Professional) Use of lubricants and greases in open systems.	PC 24: Lubricants, greases, release products	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>b</i>)	Use as heat transfer fluids	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products	ERC 9b: Wide dispersive outdoor use of substances in closed systems ERC 9a: Wide dispersive indoor use of substances in closed
<i>c)</i>	Use as metalworking fluid	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing	systems ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>d</i>)	(Professional) Use of lubricants in high energy open processes	products PC 24: Lubricants, greases, release products	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>e)</i>	Professional Use of Dishwash products	PC 35: Washing and cleaning products (including solvent based products)	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>f</i>)	Professional Use of Medical Devices	PC 35: Washing and cleaning products (including solvent based products)	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>g</i>)	Professional Use of General surface cleaning products	PC 35: Washing and cleaning products (including solvent based products)	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>h</i>)	General professional use of lubricants and greases in vehicles or machinery.	PC 24: Lubricants, greases, release products	ERC 9a: Wide dispersive indoor use of substances in closed systems
<i>i)</i>	(Re)packing of mixture	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products	ERC 9b: Wide dispersive outdoor use of substances in closed systems ERC 9a: Wide dispersive indoor use of substances in closed systems

Life cycle step	description of the use	chemical product category or Article category	Environmental release category
j)	Use as anti-icing of roads & parking lots	PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products	ERC 8d: Wide dispersive outdoor use of processing aids in open systems
Consumer uses			
<i>a</i>)	Use of Dishwash products	PC 35: Washing and cleaning products (including solvent based products)	ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>b</i>)	use in functional fluids	 PC 9a: Coatings and paints, thinners, paint removes PC 24: Lubricants, greases, release products PC 16: Heat transfer fluids PC 4: Anti-freeze and de-icing products 	ERC 9b: Wide dispersive outdoor use of substances in closed systems ERC 9a: Wide dispersive indoor use of substances in closed systems
<i>c)</i>	(Consumer) Use of lubricants and greases in open systems.	PC 24: Lubricants, greases, release products	ERC 8d: Wide dispersive outdoor use of processing aids in open systems ERC 8a: Wide dispersive indoor use of processing aids in open systems
<i>d</i>)	General consumer use of lubricants and greases in vehicles or machinery.	PC 24: Lubricants, greases, release products	ERC 9a: Wide dispersive indoor use of substances in closed systems

6 DATA SOURCES

Registration dossiers

7 PHYSICOCHEMICAL PROPERTIES

Table 10: Summary of physicochemical properties

Property	Value	Reference	Comment (e.g. measured or estimated)
Physical state at 20 °C and 101,3 kPa	solid	visual inspection	
Melting/freezing point	100 °C	CRC_Handbook of Chemistry and Physics, CRC-Press, 91st Edition, Section 3-40	Handbook data
Boiling point	204 °C at 20 hPa	CRC-Handbook of Chemistry and Physics, W.M. Haynes, 91st Edition, 2010-2011, CRC Press, Section 3-40	Handbook data
Relative density	1.36 at 20 °C	GESTIS data base	Handbook data
Vapour pressure	0.007 kPa at 25 °C		EPI Suite (version 4.11) using MPBPVPWIN, estimation
Surface tension	n.a.		In accordance with Regulation

Property	Value	Reference	Comment (e.g. measured or estimated)
			(EC) No 1907/2006 Annex VII, section 7.6, Column 2, a study to determine the surface tension needs not to be conducted. Due to chemical structure, the substance is not expected to be surface-active.
Water solubility	19 g/l at 20 °C	GESTIS data base	Handbook data
Partition coefficient n- octanol/water	1.34 at 22.7 °C	OECD Guideline 117 (Partition Coefficient (n-octanol / water), HPLC Method)	measured
Granulometry	D10 ca. 849 μm D50 ca. 1256 μm D90 ca. 2132.9 μm	ISO13320-1	measured by Laser Diffraction method
Stability in organic solvents and identity of relevant degradation products	n.a.		In accordance with Regulation (EC) No 1907/2006 Annex IX, section 7.15, Column 1, a study needs not to be conducted, because the stability of the substance in organic solvents is not considered critical.
Dissociation constant	pKa 8.37 for 5-methyl- 1H-benzotriazole at 20 °C;	International Union of Pure and Applied Chemistry (IUPAC), IUPAC Chemical Data Series, 23, 159 (1979).	Handbook data
Viscosity	n.a.		The substance is a solid.

8 EVALUATION OF PHYSICAL HAZARDS

Not assessed in this dossier.

9 TOXICOKINETICS (ABSORPTION, METABOLISM, DISTRIBUTION AND ELIMINATION)

Not assessed in this dossier.

10 EVALUATION OF HEALTH HAZARDS

Not assessed in this dossier.

11 EVALUATION OF ENVIRONMENTAL HAZARDS

11.1 Rapid degradability of organic substances

Method	Results	Remarks	Reference
Hydrolysis OECD 111	Temperature: 50 °C 5 days incubation	Reliability 1	Registration dossier
	pH 4: Hydrolytically stable pH 7: Hydrolytically stable pH 9: Hydrolytically stable	Test material: CAS 95-14-7 purity > 99%	(Anonymous, 2013)
Ready biodegradability	Temperature: 20 °C Inoculum: activated sludge	Reliability 2	Registration dossier
OECD 301D	(two test series: adapted and non-adapted) Initial concentration: 0.6, 2.0, 6.0 and 20 mg/L 0 % biodegradation (O2	Test material: CAS 95-14-7 purity > 99%	(Anonymous, 1991a)
	consumption) after 28 days (adapted and non-adapted)		
Ready biodegradability	Temperature: 20-25 °C Inoculum: activated sludge	Reliability 2	Registration dossier
OECD 301B	(adapted, from SCAS Test) Initial Concentration: 10 mg/L (based on Carbon)	Test material: CAS 95-14-7 purity > 99%	(Anonymous, 1994a)
	0 % biodegradation (CO2 production) after 28 days		

11.1.1 Ready biodegradability

The biodegradation potential of 1H-benzotriazol was studied in compliance with the OECD Guideline 301 D (Anonymous, 1991a). The substance (initial concentration 0.6, 2.0, 6.0 and 20 mg/L) was tested with adapted (14 days pre-exposure to benzotriazole solution (50-100 mg/L)) and non-adapted inoculum. After 28 days no biodegradation was observed in both inocula.

This result was confirmed by a study according to OECD Guideline OECD 301B (Anonymous, 1994a). Adapted activated sludge (freshly from a SCAS Test) was used for this study. After 28 days 0 % biodegradation (CO₂ production) was observed. The reference substance reached the pass level after 5 days. The toxicity test shows > 25 % degradation within 14 days (41.6 %).

In conclusion 1H-benzotriazole is considered to be not readily biodegradable.

11.1.2 BOD₅/COD

No data available

11.1.3 Hydrolysis

Hydrolysis was tested according to the OECD Guideline 111 at three different pH-Values (4, 7 and 9) in an incubation chamber at 50 °C for 5 days (Anonymous, 2013). It was found that 1H-benzotriazole was stable at all three pH-values (concentration of the test substance after 5 days ~ 100 % of the started concentrations).

11.1.4 Other convincing scientific evidence

11.1.4.1 Field investigations and monitoring data (if relevant for C&L)

No data available.

11.1.4.2 Inherent and enhanced ready biodegradability tests

In the registration dossier an inherent biodegradability tests according to OECD guideline 302A is available (Anonymous, 1994b). Predominantly domestic sewage (adapted) was used as inoculum. Degradation of 0.8 % (DOC removal) was observed after 30 days. Some adsorption of test substance has been observed, but only during day 1 to 4.

Furthermore, a test according to OECD guideline 302B is available (Anonymous, 1988). Degradation, based on test material analysis, of 83 % (in the dark) and 90 % (illuminated by daylight) after 28 days was observed, but 7-day pass level has been missed (50 and 55 %, respectively). 95 % of the reference substance aniline was degraded after 7 days. As the adaption of the inoculum was not stated, the study should not be considered for classification.

11.1.4.3 Water, water-sediment and soil degradation data (including simulation studies)

No data available.

11.1.4.4 Photochemical degradation

An atmospheric half-life of 10.7 days was calculated (AOPWIN v1.91) for the reaction of 1H-benzotriazole with OH radicals.

Regarding phototransformation in water, two studies are available, which provide clear indication of relevant photodegradation processes of 1H-Benzotriazole in aqueous solutions under acidic and neutral pH conditions (Andreozzi et al., 1999; Hem et al., 2003). Under basic conditions, the ionic form of 1H-Benzotriazole has been dominant, showing a reduced reactivity to UV light. Aniline, phenazine and supposable an oxidation product of phenazine were identified as relevant transformation products of 1H-Benzotriazole. Based on these findings it is concluded that phototransformation in water may enhance the detoxification and biodegradability of 1H-Benzotriazole.

11.2 Environmental distribution

11.2.1 Adsorption/Desorption

According to a study by Breedveld et al. (2003) conducted in accordance to OECD guideline 106 1Hbenzotriazole is showing a high mobility in soils containing low organic matter content. While there is significant adsorption in soils of high organic matter content even in these matrices the mobility remains high.

The sorption behaviour of 5-methyl-benzotrizaole and 1H-benzotriazole was investigated (test method: ASTM D4319-93) on four different soil matrices with organic carbon contents between 0.27 and 1.72% (Hard et al. 2004). Batch systems facilitated the equilibrium sorption with analysis by HPLC. Results from the experiment have been fitted by Langmuir, Freundlich and linear isotherms, giving indications on different factors affecting the sorption behaviour of both substances. As all members of the benzotriazole group have shown a strong dipole moment (polar character), binding to soil is a complex combination of molecular driving forces with different binding sites for adsorption, absorption and hydrogen bonding. Maximum log Koc values of 1.89 (1H-benzotriazole) and 2.04 (5-methyl-benzotrizaole) have been determined.

QSAR calculations made by the registrant and using KOCWIN (v.2.00) of EPI Suite on 1H-benzotriazole estimated the log K_{OC} to be in the range of 1.724 (MCI method) to 1.795 (KOW method). In a further QSAR calculation according to Schüürmann et al. (2006) a log Koc of 1.69 has been estimated.

11.2.2 Volatilisation

The registrant calculated the vapour pressure of Methyl-1H-benzotriazole with EPI Suite (version 4.11) using MPBPVPWIN. According to this calculation, the substance has a vapour pressure of 0.007 kPa at 25 °C.

A Henry's Law constant of 0 Pa m³/mol (25 °C) has been calculated by the registrant using equation R.16-4 (ECHA Guidance on information requirements and chemical safety assessment).

11.3 Bioaccumulation

Table 12: Summary of relevant information on aquatic bioaccumulation

Method	Results	Remarks	Reference
Log Kow	Log Kow = 1.34	Reliability 2	Registration dossier
OECD 117			(Anonymous,
			1991b)

11.3.1 Estimated bioaccumulation

No data relevant for classification is available.

11.3.2 Measured partition coefficient and bioaccumulation test data

The registrant performed a study according to OECD 117 to estimate the log K_{OW} . According to the study, the log K_{OW} is 1.34. This low log K_{OW} predicts a low aquatic bioaccumulation potential.

11.4 Aquatic acute toxicity

All tests summarised in the following tables were evaluated according to Klimisch et al. (1997). All tests published in Seeland et al. (2012) were evaluated with reliability 1 according to Klimisch et al. (1997) as they were conducted according to OECD Guidelines without deviations. In addition, the test concentrations were analytically verified by demonstrating the stability of the test substance in a separate stability test. The deviation from nominal concentrations was only 6.3 to 7.0 %.

Species	Substance	Results [mg/L]	Test method and experimental conditions	Reliability	Reference
Brachydanio rerio (new name: Danio rerio)	1 <i>H-</i> BT CAS 95-14-7	96h-LC ₅₀ = 180	OECD 203; semi-static; conc.: 32 – 56 – 100 – 180 – 320 mg/L; 10 fishes (1 replicate); length: 2.7 ± 0.2 cm; temp.: 24.3 – 25.4 °C; pH 7.2-8.2	1	Registration dossier: (Anonymous, 1993a)
Brachydanio rerio (new name: Danio rerio)	1H-BT CAS 95-14-7	96h-LC ₅₀ > 100	Verfahrensvorschlag (F.1.1) "Letale Wirkung beim Zebrabärbling Brachydario rerio" (LC0, LC 50, LC 100; 48-96 Stunden) des Umweltbundesamtes, Stand 01.06.83; static; conc.: 100 mg/L (Limit-test); 10 fishes (1 replicate); length: 30 ± 5 mm; temp.: 23 ± 2 °C; pH 6.4 – 7.0	2 – deficiencies in reporting	Registration dossier: (Anonymous, 1985)
Daphnia magna	1H-BT CAS 95-14-7	48h-EC ₅₀ = 137	OECD 202; static; conc.: 32 – 56 – 100 – 180 – 320 – 560 – 1000 mg/L; 4 replicates with 5 daphnids each; 19.9 – 20.3 °C, pH 7.0 – 8.1; 16 h light/d	1	Registration dossier: (Anonymous, 1993b)
Daphnia magna	1H-BT CAS 95-14-7	48h-EC ₅₀ = 91	"Bestimmung der Schwimmunfähigkeit beim Wasserfloh - Daphnia magna-" (EC0, EC50, EC100; 24 Stunden; statisches System) Verfahrensvorschlag: Umweltbundesamt Berlin, Stand Mai 1984; static; nominal: $63 - 88 - 125 - 177 - 250 - 354$ and 500 mg/L ; 10 replicates with 1 daphnid each; 21 ± 0.5 °C; pH 7.6-7.7;	2	Registration dossier: (Anonymous, 1991c)
Daphnia magna	1H-BT CAS 95-14-7	48h-EC ₅₀ = 107	OECD 202; static; conc.: 3.0 – 4.5 – 4.5 – 6.7 – 10.1 – 15.1 – 22.8 – 34.2 – 51.3 – 76.9 – 115 mg/L; 4 replicates with 5 daphnids each; age: < 24h; 20 °C; 16h light per day; no feeding	1	(Seeland et al., 2012)
Daphnia galeata	1H-BT CAS 95-14-7	48h-EC ₅₀ = 15.8	OECD 202; static; conc.: 3.0 – 4.5 – 4.5 – 6.7 – 10.1 – 15.1 – 22.8 – 34.2 – 51.3 – 76.9 – 115 mg/L; 4 replicates with 5 daphnids each; age: < 24h; 20 °C; 16h light per day; no feeding	1	(Seeland et al., 2012)
Desmodesmus subspicatus (previous name: Scenedesmus subspicatus)	1H-BT CAS 95-14-7	72h-ErC ₅₀ =not reported	OECD 201; static; concentrations: $0.3 - 0.6 - 1.2 - 2.5 5.0 \text{ mg/L}$; temp.: $23 \pm 1 \degree$ C; photoperiod 24h with 6,500 to 10,000 lux; start cell number: $5*10^4$ cells/mL; 5 control replicates and 3 for the test substance;	1	(Seeland et al., 2012)
Desmodesmus subspicatus (previous name: Scenedesmus subspicatus)	1H-BT CAS 95-14-7	72h-ErC ₅₀ =231	DIN 38412-9; static; conc.: nominal: 1 - 3.2 – 10 – 32 – 100 - 320 and 1000 mg/L	4 – Reporting deficiencies: replicates unknown	Registration dossier: (Anonymous, 1991d)
Pseudokirchner ella subcapitata (reported as Selenastrum capricornutum)	1H-BT CAS 95-14-7	72h-ErC ₅₀ = 75	OECD 201; static; conc.: $6.4 - 20 - 36 - 64 - 112 - 200 - 640$ mg/L; 23 ± 1 °C; pH $8.0 - 8.4$; 4 control replicates; 2 replicates per test concentration	2 – reduced replicates + some deficiencies in reporting	Registration dossier: (Anonymous, 1994c)

11.4.1 Acute (short-term) toxicity to fish

Two acute toxicity tests with fish (*Danio rerio*) are available from the registration dossier. The one conducted in 1993 with a reliability of 1 according to OECD Guideline 203 results in a 96h-LC₅₀ of 180 mg/L. In the other acute toxicity test with *Danio rerio* conducted in 1985 (reliability 2 as there were reporting deficiencies), no effect occurred up to a concentration of 100 mg/L.

11.4.2 Acute (short-term) toxicity to aquatic invertebrates

Short-term toxicity tests with two aquatic invertebrate species are available: *Daphnia magna* and *Daphnia galeata*. All tests listed in Table 13 were conducted according to accepted guidelines.

The most sensitive result occurred in a short-term toxicity test with *Daphnia galeata* (Seeland et al. 2012) with a 48h-EC₅₀ of 15.8 mg/L. *Daphnia magna* is less sensitive with a 48h-EC₅₀ of 91 mg/L Anonymous (1991c).

11.4.3 Acute (short-term) toxicity to algae or other aquatic plants

There are three tests with algae (Desmodesmus subspicatus and Pseudokirchneriella subcapitata) available.

The lowest 72h- E_rC_{50} resulted from a test conducted by Anonymous (1994c) (registration dossier) with 75 mg/L for *Pseudokirchneriella subcapitata* (previous names: *Raphidocelis subcapitata*, *Selenastrum capricornutum*).

In the test conducted by Seeland et al. (2012) no 72h- E_rC_{50} was reported for *Desmodesmus subspicatus* (previous name: *Scenedesmus subspicatus*). The test conducted by Anonymous (1991d) will not be used for classification as there were reporting deficiencies and the test was assessed with Klimisch 4.

11.4.4 Acute (short-term) toxicity to other aquatic organisms

There are no tests for other aquatic organisms available.

11.5 Long-term aquatic hazard

All tests summarised in the following tables were evaluated according to Klimisch et al. (1997). All tests published in Seeland et al. (2012) were evaluated with reliability 1 according to Klimisch et al. (1997) as they were conducted according to OECD Guidelines without deviations. In addition, the test concentrations were analytically verified by demonstrating the stability of the test substance in a separate stability test. The deviation from nominal concentrations was only 6.3 to 7.0 %.

Species	Sub-stance	Results [mg/L]	Test method and experimental conditions	Reliability	Reference
Danio rerio	1H-BT CAS 95-14-7	35d- NOEC= 1.07 (post hatch survival)	OECD 234, exposure duration: 63d; flow-through, conc.: nominal: 0.10 0.32, 1.00, 3.20, 10.0 mg/L, measured: 0.104, 0.331, 1.07, 3.34, 11.0 mg/L; no vehicle; 30 fertilized eggs per replicate, 4 replicates; 27 ± 2 °C; pH: 6.24 – 7.24; 87-117% diss. Oxygen; 12h light per day; 1000 lumen	1	Registration dossier: (Anonymous, 2021)
Daphnia magna	1H-BT CAS 95-14-7	21d- NOEC= 25.9	"Daphnia Reproduction Test" of OECD Guideline 202, Part II (Draft 7/1993); semi-static; conc.: nominal: 0.7 - 2.2 - 7.0 - 22.1 and 70.0 mg/L; 20 ± 2 °C	2	Registration dossier: (Anonymous, 1995)
Daphnia magna	1H-BT CAS 95-14-7	21d-EC ₁₀ > 12.8	OECD 211; semi-static; conc.: $0.4 - 0.8 - 1.6 - 3.2$ - $6.4 - 12.8$ mg/L; 10 replicates with 1 daphnid each; age < 24h; 20 °C; 16h light per day; feeding: 0.2 mg C/ (daphnid and day)	1	(Seeland et al., 2012)
Daphnia galeata	1H-BT CAS 95-14-7	21d-EC ₁₀ = 0.97	OECD 211; semi-static; conc.: $0.4 - 0.8 - 1.6 - 3.2$ - $6.4 - 12.8$ mg/L; 10 replicates with 1 daphnid each; age < 24h; 20 °C; 16h light per day; feeding: 0.2 mg C/ (daphnid and day)	1	(Seeland et al., 2012)
Desmodesmus subspicatus (previous name: Scenedesmus subspicatus)	1H-BT CAS 95-14-7	72h-E _r C ₁₀ = 1.18	OECD 201; static; concentrations: $0.3 - 0.6 - 1.2 - 2.5 5.0 \text{ mg/L}$; temp.: 23 ± 1 °C; photoperiod 24h with 6,500 to 10,000 lux; start cell number: $5*10^4$ cells/mL; 5 control replicates and 3 for the test substance;	1	(Seeland et al., 2012)
Desmodesmus subspicatus (previous name: Scenedesmus subspicatus)	1H-BT CAS 95-14-7	$72h-E_rC_{10} = 58$	DIN 38412-9; static; conc.: nominal: 1 - 3.2 - 10 - 32 - 100 - 320 and 1000 mg/L	4 – Reporting deficiencies: replicates unknown	Registration dossier: (Anonymous, 1991d)
Pseudokirchner ella subcapitata (reported as Selenastrum capricornutum)	1H-BT CAS 95-14-7	72h-ErC ₁₀ = 10.5 72h- NOEC= 10	OECD 201; static; conc.: $6.4 - 20 - 36 - 64 - 112 - 200 - 640$ mg/L; 23 ± 1 °C; pH 8.0 - 8.4; 4 control replicates; 2 replicates per test concentration	2 – reduced replicates + some deficiencies in reporting	Registration dossier: (Anonymous, 1994c)
Lemna minor	1H-BT CAS 95-14-7	7d-EC ₁₀ = 3.94	OECD 221; static; conc.: $1.0 - 2.5 - 5.0 - 10.0 - 20.0 \text{ mg/L}$; 12 healthy fonds in each glass beaker (250 mL, 10.5 cm Ø); 6 control replicates and 3 for the test substance;	1	(Seeland et al., 2012)

Table 14: Summary of relevant information on chronic aquatic toxicity

11.5.1 Chronic toxicity to fish

There is one long-term test for fish available. Anonymous (2021) conducted a Fish Sexual Development Test according to OECD TG 234 for 63 days. Post-hatch survival rates at 35 dpf varied between 83.3 % and 92.5 %. Statistical significant differences occurred between control and the two highest treatments with a monotonous concentration-response relationship. Therefore, the 35d-NOEC was 1.07 mg/L (post hatch survival during early-life-stage). Three days before test termination (60dpf), mortality occurred in two vessels of the control and the first treatment level. In total, 21 fish in controls and 20 fish at a treatment level of 0.10 mg benzotriazole/L (mean measured) were found dead. The remaining fish did not show any signs of disease. A statistical analysis of the post-hatch survival at 63 dpf could not be performed as the increased mortality in the controls 3 days before test termination occurred.

11.5.2 Chronic toxicity to aquatic invertebrates

Three long-term toxicity tests with aquatic invertebrates (Daphnia magna and Daphnia galeata) are available.

The most sensitive organism was again *Daphnia galeata* with a 21d-EC₁₀ of 0.91 mg/L. *Daphnia magna* was less sensitive with a 21d-EC₁₀ of 12.8 mg/L (both: Seeland et al. 2012).

11.5.3 Chronic toxicity to algae or other aquatic plants

There are three tests with algae (*Desmodesmus subspicatus* and *Pseudokirchneriella subcapitata*) and one with the aquatic plant *Lemna minor* available.

The lowest 72h- E_rC_{10} resulted from a test conducted by Anonymous (1994c) (registration dossier) with 10.5 mg/L for *Pseudokirchneriella subcapitata* (previous names: *Raphidocelis subcapitata*, *Selenastrum capricornutum*). The 72h-NOE_rC from this test was 10 mg/L.

The test conducted by Seeland et al. (2012) resulted in a 72h- E_rC_{10} of 1.18 mg/L for *Desmodesmus* subspicatus (previous name: *Scenedesmus subspicatus*).

The test conducted by Anonymous (1991d) will not be used for classification as there were reporting deficiencies and the test was assessed with Klimisch 4.

The test carried out with Lemna minor reported in Seeland et al. (2012) results in a 7d-EC₁₀ of 3.94 mg/L.

11.5.4 Chronic toxicity to other aquatic organisms

There are no tests for other aquatic organisms available.

11.6 Comparison with the CLP criteria

11.6.1 Acute aquatic hazard

Table 15: Comparison with criteria for acute aquatic hazards

Criteria for acute environmental hazards	1H-benzotriazole	Conclusion
Cat. 1: $I C_{50}/FC_{50}/FrC_{50} \leq 1 \text{ mg/I}$	Fish: Danio rerio 96h-I $C_{co} > 100 \text{ mg/I} \pmod{2}$	No classification
$LC_{50}/LC_{50}/LC_{50} \leq 1 \text{ mg/L}$		classification
	Invertebrates: <i>Daphnia galeata</i>	
	0	
	environmental hazards	environmental hazardsCat. 1:Fish: Danio rerio $LC_{50}/EC_{50}/ErC_{50} \le 1 \text{ mg/L}$ 96h- $LC_{50} > 100 \text{ mg/L}$ (nominal)

11.6.2 Long-term aquatic hazard (including bioaccumulation potential and degradation)

	Criteria for environmental hazards	1H-benzotriazole	Conclusion
Rapid Degradation	Half-life hydrolysis < 16 days	Hydrolytically stable	Not rapidly degradable
	Readily biodegradable in a 28- day test for ready biodegradability	0 % after 28 days (O ₂ consumption)	
Bioaccumulation	$\begin{array}{l} BCF \geq 500 \\ Log \; K_{ow} \geq 4 \end{array}$	Experimental determined BCF not available	Not bioaccumulative (low potential for bioconcentration in the
Aquatic Toxicity	Non-rapidly degradable substances: Cat. 1: NOEC/EC ₁₀ \leq 0.1 mg/L Cat. 2: NOEC/EC ₁₀ > 0.1 to \leq 1 mg/L (based on Table 4.1.0 (b) (i) of	Log $K_{ow} = 1.34$ Fish: <i>Danio rerio</i> 35d-NOEC = 1.07 mg/L (measured) Invertebrates: <i>Daphnia galeata</i> 21d-EC ₁₀ = 0.97 mg/L (nominal)	aquatic environment) Aquatic Chronic 2 (based on 21d- EC ₁₀ =0.97 mg/L)
	the CLP Regulation)	Algae: <i>Desmodesmus subspicatus</i> 72h- $E_rC_{10} = 1.18 \text{ mg/L}$ (nominal) Aquatic plant: <i>Lemna minor</i> 7d- $EC_{10} = 3.94 \text{ mg/L}$ (nominal)	

Table 16:	Comparison	with	criteria	for	environmental hazards
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11.7 Conclusion on classification and labelling for environmental hazards

Acute aquatic hazard:

All valid short-term toxicity E/LC_{50} -values are > 1 mg/L. Therefore, no acute aquatic classification is proposed.

Chronic aquatic hazard:

1H-benzotriazole is not rapidly degradable and has a low potential for bioaccumulation in the aquatic environment.

Chronic toxicity data is available for all three trophic levels. The most sensitive valid long-term toxicity value is $EC_{10} = 0.97 \text{ mg/L}$ (*Daphnia galeata*). This results in a classification of 1H-benzotriazole as Aquatic Chronic 2 based on the criteria given in Table 4.1.0(b)(i) of the CLP Regulation.

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13 ANNEXES

Annex I