

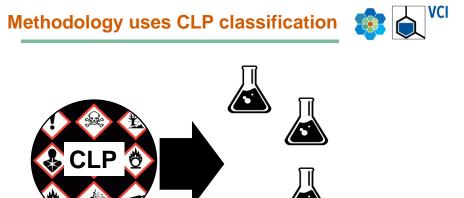
### Lead Component Identification (LCID) Methodology

Donna Seid, Ashland Services BV Stefanie Welz, BASF Christian Boegi, BASF Angelika Hanschmidt, VCI 19 November 2014





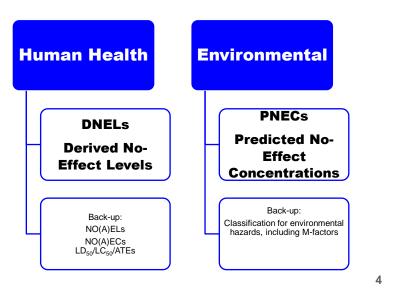
# **COMMON SENSE**



## to identify relevant components that drive the hazard classification of the mixture



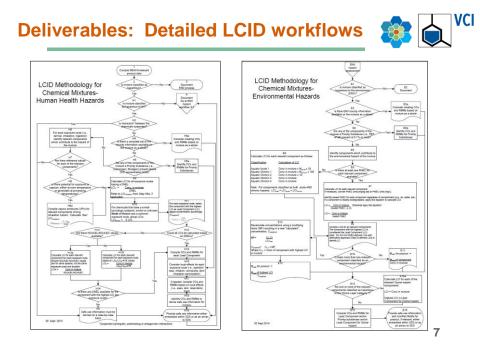






If the risks are controlled for the most hazardous component, then the risks from the other substances in the mixture are also likely controlled.





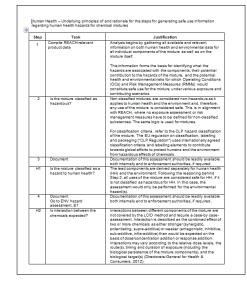
### **Practical guide**

Oct. 201-		DRAFT REACH Practical Guide / Part III: Motures under REACH	28 Oct 2014		DRAFT REACH Practical Guide / Part II: Mixtures under REACH
Step	Task	Comments	Step	Task	Comments
		Note: The primary source of information should be the suppli- er's (e)SDS, if other data sources are used, ensure that the obtained data is relevant for the components used in the formu- lation of the midure. Glo to Step 2.			chemicals, for example resulting from similar targets (e.g., ligand-receptor interaction) (Directionate-General for Health & Consumers, 2012) Evaluation of specific properties of mixtures relies heavily on expent innovedage of the formulater and/or a compa-
2	is the mixture classi- fied as hazardous?	Not of simp 2. Refer to the CLP hazard classification of the mixture. Non-classified minutes are considered non-hazardous as it applies to human health and the environment and, therefore, any use of the minute is considered safe. Yes/No decision.			Experimental events of the contraster and a comparison of the processing of the contraster and the company's position and allow for easy access to enforcement authorities, if required. Yes/No decision. If yes, go to Step H3. If no, po to Step H3.
		If yes, go to Step H1. If no, go to Step 3.	нз	must be derived on a	The LCID methodology is not applicable if there are suspected interactions between the components. Safe use information is therefore derived on a case-by-case basis.
3	Document	The mixture is not classified as hazardous, either as a human health (HH) or environmental (ENV) hazard. Document this assessment and allow for easy access to enforcement authori- ties, if required. Records should include date of review.			Document the company's position and allow for easy access to enforcement authorities, if required. Go to Step H19.
		END LCID methodology workflow.	H4	Is there human	Has there been toxicity testing of the mixture as a whole?
HI	Is the mixture classi- fied as a hazard to human health?	Refer to CLP hazard classification of the mixture. Yes/No decision. If yes, go to Step H2.		health toxicity infor- mation available on the mixture as a whole?	An assessment may also be based on data generated on a mixture of reasonably similar composition or a "surrogate mix- ture," i.e., a mixture close in composition (components and proportions) to the mixture under evaluation.
4	Document Go to ENV hazard assessment, E1	If no, go to Step 4. Document the assessment that the mixture is not classified as a human health hazard and allow for easy access to enforcement authorities, if required. Records should include date of review. The mixture has, however, been classified as hazardous to the environment (EV/), therefore, go to Step E1.			Can any of the test results be used to derive safe use infor- mation for the mixture as a velocit "Information may be availab- ble from the company's sen testing of the mixture (e.g., for equilating purposes), or through a negliarity through information provided on their (e)SDS) or if the mixture is a commodity or formulation, through an industry sector organization or pub- lahed literature.
H2	Is interaction be- tween the chemicals expected?	Consider the potential for interactions between the compo- ents. Interaction is described as the contexider effect of two or more chemicals as either stronger synapsitic, potentialing, appr-additive (or wake) participation, (initiality, auto-additive, appr-additive) or wake (antipopation, (initiality, auto-additive, appr-additive) or energiones addition,, Nitractions and curation of exposure addition, Nitractions tance of the ministre comparents, and the biological persis- tance of the ministre comparents, and the biological persis- tance of the ministre comparents, and the biological persistence of the ministre comparents. In the biological persistence of the ministre comparents, and the biological persistence of the ministre comparents. In the biological persistence of the ministre comparents, and the biological persistence of the ministre comparents. In the biological persistence of the ministre comparents. In the biological persistence of the ministre comparents. The biological persistence of the ministre comparents and the biological persistence of the ministre comparents. The biological persistence of the ministre comparents and the biological persistence of the ministre comparents. The ministre comparents and the biological persistence of the ministre comparents. The ministre comparents and the biological persistence of the ministre comparent and the biological persistence of the ministre comparent and the biological persistence of the ministre comparent and the biological persistence of the ministre of the ministre comparent and the biological persistence of the ministre of the ministre com			If the testing data set for the entire mixture is in complete, taking the LCD methodopy (e.g., let data so the mixture as well as matchine regarding activity block), but last of mixture and the set of the set of the set of the set of the observation of the set of the set of the set of the enforcement authorities, if required. If yes, go to Sites H4a. If yes, go to Sites H4a.
		Transitions commension anoune. To isologine, Examples are chemical modifying the ab- tions addrarby. Examples are chemical modifying the ab- statose in contention of the addrammediate and the transport mechanisms (codes, chearance) Metabolic interactions: chemical completing for active transport mechanisms (codes, chearance) Metabolic interactions: chemical modifying the metabolism of other micitar components and another the addrammediate and another the ba- bogues regioners resulting them accounce to the individual	H4a	Consider creating OCs and RMMs based on mixture as a whole	Consider if any of the bat results on the miture is a whole can be used to derive that use information. If data is taking for some of the endpoints, consider following the LCD methodoxys fill the gaps for the other exposure nucles and/or health hazard endpoints. If this is the case, then go to Stips 152. Document the company's position and allow for easy access to enforcement at Marchile, if requires

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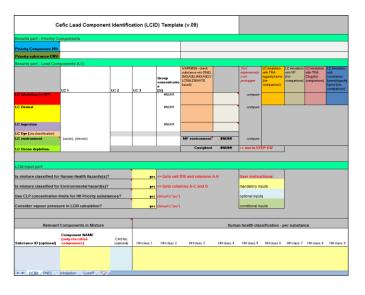
### Test examples

		Test Example 3				
		Name of Product	Test Example 3			Comments
	Complete File Contenant Provide State	Classification	Ac. Tox. 3 (oral, derm.), STOT	RE 2, Skin corr. 1B, Eye dam. 1		
CID Methodology for	Anna and a lange	Relevant components	Component 1	Component 2	Component 3	
Chemical Mixtures-	And the second second	Relevant CAS Nos. (if available)				
uman Health Hazards	Date:	Concentration of relevant component	45	25	10	
aman meatin mazarus	Sector man	Health Hazard CLP classification of	Ac. Tox. 3 (oral)	STOT RE 2	Ac. Tox. 2 (dermal)	
		Health Hazard CLP classification of relevant component			Skin corr. 1B	
		relevant component			Eye dam, 1	
-	daton west	Priority Substance (yes/no)	No	No	No	
For each comments table in	Careau Unity Do	DNEL inh (mg/m*)	100	30	45	
which candidate to the factories of	Alfan a said an	DNEL derm (mg/kg bw day)	10	4	2	1
		LCI (DNEL) - oral (if applicable, e.g.,		NIA	N/A	
Al Developer alle	Alexandra and and and the	consumer)	NA			
anne tratt	Second Manager Price and Second Secon	Vapour Pressures @ 25°C (hPa)	NIA, mixture of solids	N/A, mixture of solids	N/A, mixture of solids	
1		LCI (DNEL) - inh	45 / 100 = 0.45	25/30 = 0.8	10/45=0.2	LCI = Conc / DNEL
Alexandra and	Catalate LG for all segment raises Names a 2042	LCI (DNEL) - derm	45 / 10 = 4.5	25/4=6.3	10/2=5.0	LCI = Conc / DNEL
a provide a promary	Ander to 1/0 Annual Tari Dage Mills, P	LCI (DNEL) - oral	NIA	NIA	NA	
Tage Mills Dangthe equipment of Mill Tar	For chercule fail an 2 million (1997)	Lead Component for relevant		Lead Component for inhalation and dermal routes of exposure		Highest LCI-inhalation is Component 2 (0.8); Highe LCI-dermal is Component 2 (6.3)
Manager Constant Part	reparents positiv	exposure routes		orexposure	Skin corr. 1B	Local effects come from Component 3 (Skin Corr. a
		Relevant local effects	None	None	Eve dam, 1	eve damage)
-Ter two minut. Accus	Camily to the Call Alter Annaciant	Exposure Scenario		1 Monte	Cys dam. 1	eje santage)
T		Contributing Scenario				
	(ma 10 ma 10 ma 10	Operating Conditions (OCs)	≥ 4h, 5 davs a week	> 4h. 5 days a week	> 1h. 5 days a week	Exposure duration for Component 3 is not relevant t
Tenade : 11 Tenade to the tena	Completion Constraints					assessment of local effects, so the OCs were taken from the Lead Component (Component 2).
	Terrent Control Terrent Control Terrent Control	Risk Management Measures (RMMs)	Enhanced general ventilation Gloves tested to EN 374	Local exhaust ventilation Good general ventilation Gloves tested to EN 374	Gloves tested to EN 374 Goggles	
Allowed and the lotter	tends (Conclass of					
	man	Modified OCs for the Mixture	> 4h, 5 days a week			From Component 2 as Lead Component-inhalation
20 lips 20 m		Modified RMMs for the Mixture	Local exhaust ventilation Good general ventilation Gloves tested to FN 374			From Component 2 as Lead Component-inhalation dermal and Component 3 - local effects on skin an
			Goggles			eves

Example when DNEL values are available for all relevant components



### **LCID excel-based tool**



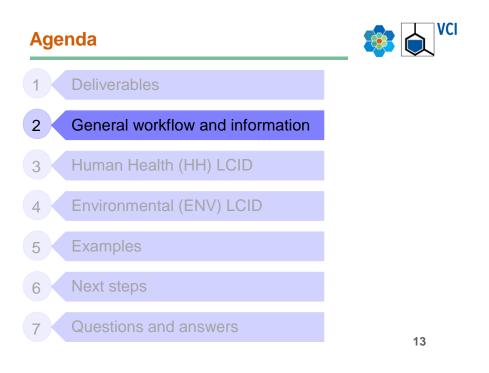
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### **Automation**

Primary focus was to develop an approach based on science and logical assumptions

Once methodology is validated; make available to IT system developers to create algorithms/rules sets



### **Practical considerations**



LCID methodology may be applied:

When the identity of the Lead Component(s) is less obvious

To support your intuitive conclusions

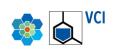


### High level LCID workflow

- 1. Identify components of the mixture and collect existing knowledge for the assessment of the mixture; consider cut-off criteria
- 2. Document modifications of the determinants of exposure in the mixture
- 3 Carry out CLP classification of the mixture
- 4 Is a Priority Substance(s) present in the mixture (e.g., carcinogen, mutagen, PBT, vPvB) over threshold levels?



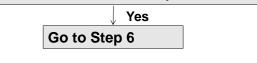
### High level LCID workflow cont'd



4 Is a Priority Substance(s) present in the mixture (e.g., carcinogen, mutagen, PBT, vPvB) over threshold levels?

No

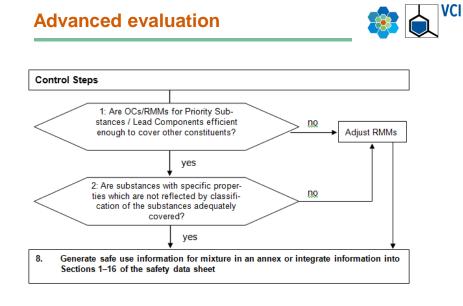
5. Identify the Lead Components; for each component driving a hazard classification of the mixture, calculate its Lead Component Indicator (LCI) by: Dividing its concentration by its DNEL (or PNEC for environmental hazards). The highest LCI for each exposure route is the Lead Component.





- 6. Identify components which contribute to any local effect classifications (for Human Health) or ozone depletion (for the Environment)?
- Collect required information OCs and RMMs for Priority Substances/Lead Components/ components driving local effects/ozone layer hazard; consolidate to derive safe use information for the mixture
- 8. Generate safe use information. Decide whether to include it in Sections 1- 16 or to develop an annex to the SDS





### **Control steps**



#### Control Step 1

Ensure that RMMs for Lead Components and Priority Substances cover protection against the other hazardous substances in the mixture • The substance-specific measure removes the Lead Component very efficiently (e.g., precipitation of remaining sulphide concentration in the waste water with iron hydroxide), however, RMM for that component has no effect on any remaining hazardous components

- Priority Substances which are classified for a certain route of exposure (e.g., nickel dioxide-carcinogenic by inhalation) might only control for one route and disregard other relevant routes of exposure
- Migration potential through glove barriers may have to be considered in recommending glove type and thickness

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### Control steps cont'd



#### Control Step 2

Address components causing risks to humans or the environment that do not meet the CLP classification and labelling criteria for the mixture • Chemicals present below the threshold levels but for which there is relevant information, such as community workplace exposure limits, DNELs or PNECs are provided by the supplier(s) (e.g., gloves to protect against local effects of a component not leading to the classification of the mixture as a whole)



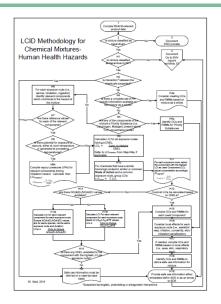


Classification	Ac. Tox. 3 (oral, derm.), STOT RE 2, Skin corr. 1B, Eye dam. 1				
Relevant components	Component 1	Component 2	Component 3		
		Lead Component for			
Lead Component for relevant		inhalation and dermal routes			
exposure routes		of exposure			
			Skin corr. 1B		
Relevant local effects	None	None	Eye dam. 1		
Exposure Scenario					
Contributing Scenario					
Operating Conditions (OCs)	> 4h, 5 days a week	> 4h, 5 days a week	> 1h, 5 days a week		
Risk Management Measures (RMMs)	Enhanced general ventilation	Local exhaust ventilation	Gloves tested to EN 374		
	Gloves tested to EN 374	Good general ventilation	Goggles		
		Gloves tested to EN 374			
Modified OCs for the Mixture	> 4h, 5 days a week				
Modified RMMs for the Mixture	Local exhaust ventilation				
	Good general ventilation				
	Gloves tested to EN 374				
	Goggles				





### Human Health (HH) LCID



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### Vapour pressure considerations



#### Is there a potential for exposure to vapours?



For each relevant component associated with the hazardous inhalation classification for the mixture, a Lead Component Indicator (LCI) is calculated.

The LCI is then calculated as follows:

$$\begin{split} & \text{LCI}_{inhalation} = \frac{C_i \ge C_{fug}}{D\text{NEL}} \\ & \text{Where:} \\ & \text{LCl_inhalation: LCI for inhalation} \\ & \text{Ci: Concentration of the component i in the mixture} \\ & \text{Cfug}^* = \text{Factor representing the potential effect of the vapour} \\ & \text{pressure (VP)} \\ & \text{DNEL: Derived no-effect level long term systemic} \end{split}$$

### **Dose/conc addition approach**





- Group chemicals that have similar mode of action and/or common toxic endpoints
- For the chemicals that have been grouped by their common toxic effect, sum their individual LCIs and this total, LCI<sub>group</sub> represents the LCI for the group
- If this "LCI<sub>group</sub>" represents the highest LCI of the components:

# The component of the grouped chemicals having the highest LCI becomes the Lead Component

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### **Dose/conc addition approach**





• Apply a weighted calculation for the Lead Component (based on the individual LCI and its concentration in the mixture, called C<sub>weighted</sub>):

$$C_{weighted} = \sum_{i=1}^{n} C_i \times \frac{LCI_i}{LCI_{max}}$$

# The RMMs for the Lead Component would be based on the $\mathbf{C}_{\text{weighted}}$ value

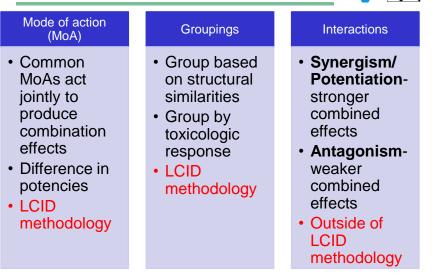


### **Approved opinions of 3 scientific EU bodies**

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### Indicating these considerations:



### Mode of action (MoA)



2. Chemicals with common modes of action will act jointly to produce combination effects that are larger than the effects of each mixture component applied singly. These effects can be described by dose/concentration addition

6. With regard to the assessment of chemical mixtures, a major knowledge gap at the present time is the lack of exposure information and the rather limited number of chemicals for which there is sufficient information on their mode of action. Currently, there is neither an agreed inventory of mode of actions, nor a defined set of criteria how to characterise or predict a mode of action for data-poor chemicals.

7. If no mode of action information is available, the dose/concentration addition method should be preferred over the independent action approach. Prediction of possible interaction requires expert judgement and hence needs to be considered on a case-by-case basis.

Reference: Directorate-General for Health & Consumers, Toxicity and Assessment of Chemical Mixtures. European Union, 2012.

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### **Default common endpoints**



ECHA, Guidance on the Application of the CLP Criteria, Guidance to Regulation (EC) No 1272/2008 on classification, labelling and packaging (CLP) of substances and mixtures, 2013

Inhalation	Dermal	Oral
<ul> <li>Acute categories 1,2,3 and 4</li> <li>H330 H331 H332</li> </ul>	<ul> <li>Acute categories 1,2,3 and 4</li> <li>H310 H311 H312</li> </ul>	<ul> <li>Acute categories 1,2,3 and 4</li> <li>H300 H301 H302</li> </ul>
		30

EUROPEAN COMMISSION t t t t t t t t t t t t t t t t t t t	🏟 🔬 <sup>VCI</sup>
COMMUNICATION FROM THE COMMISSION TO THE COUNCIL	
The combination effects of chemicals	
Chemical mixtures	

**By June 2015** – the Commission will be publishing a report on the assessment of chemical mixtures to review progress and experience on, among other items:

Opportunities for addressing knowledge gaps, in particular relating to: (i) the mode of action of chemicals,

- (ii) grouping chemicals into categories or assessment groups;
- (iii) predicting interactions; and

(iv) Identifying chemical substances that are the main drivers of mixture toxicity

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### Backup Solutions: (1) NO(A)ELs



 If one of the relevant components lacks a DNEL, then use NO(A)ELs/NO(A)ECs to ensure the appropriate comparisons



- DO NOT mix DNELs and NO(A)ELs within one route of exposure
- When using NO(A)ELS ONLY make comparison with studies that are using same species via the same exposure route and duration
- If applying NO(A)ELs to calculate LCI use:

$$LCI = \frac{Concentration in mixture}{NO(A)EL}$$

(2)  $LD_{50}/LC_{50}$  or ATEs values



If there are no NO(A)ELs then use  $LD_{50}/LC_{50}/ATE^*$  values and calculate LCI with this equation:

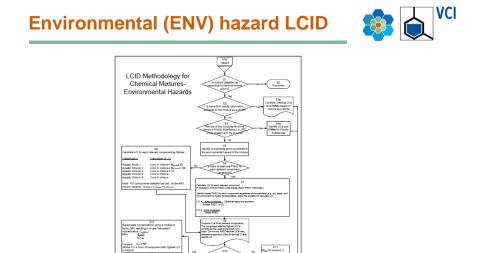
$$LCI_{\alpha} = \frac{C_{i}}{LD50/LC50/ATE}$$

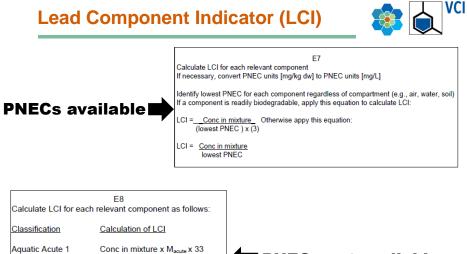
As with NO(A)ELs/NO(A)Ecs, make like comparisons:  $LD_{50}s$  with  $LD_{50}s$ ,  $LC_{50}s$  with  $LC_{50}s$ , ATEs with ATEs

Consider these reference values when making an interpretation to ensure that a potentially more toxic component is not missed when developing safe use information for the mixture

\* Acute toxicity estimates (ATEs)







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Conc in mixture x M<sub>chronic</sub> x 100

Conc in mixture x 10

Conc in mixture

Conc in mixture

Note: For components classified as both acute AND chronic hazards: LCI<sub>total</sub> = LCI<sub>acute</sub> + LCI<sub>chronic</sub>

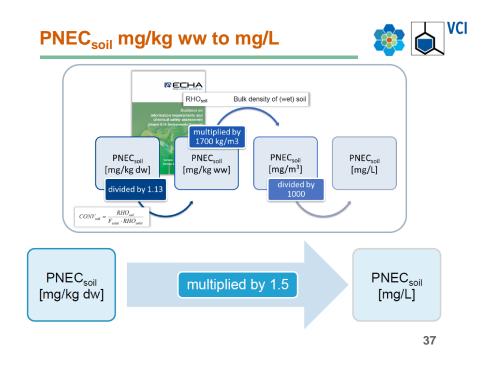
Aquatic Chronic 1

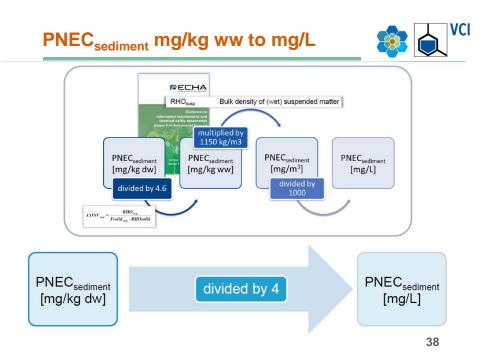
Aquatic Chronic 2

Aquatic Chronic 3

Aquatic Chronic 4







### **PNECs and back-up solution**



• There is at least one PNEC for each relevant component that drives the environmental classification of the mixture; if not then calculate LCI using the alternative approach



• Do not compare: PNEC-derived LCIs with alternative approach-derived LCIs, to identify the Lead Component

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### If more than one environmental hazard



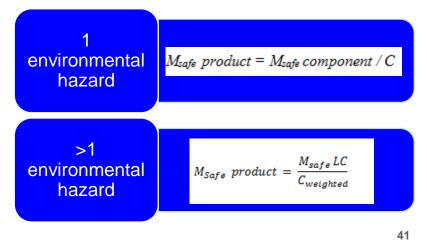
E12 Recalculate concentrations using a modifying factor (MF) resulting in a new "calculated" concentration,  $C_{weighted}$ : MF=  $\sum_{LCI} LCI_{max}$   $C_{weighted}$ =  $C_{LC} \times MF$ Where  $C_{LC}$  = Conc of component with highest LCI in mixture

A modifying factor gives increased weight to substances classified as hazardous to the environment

### **M**<sub>safe</sub> for product



Maximum daily tonnage of the substance guaranteeing safe use for a specific application



**Ozone layer hazard** 



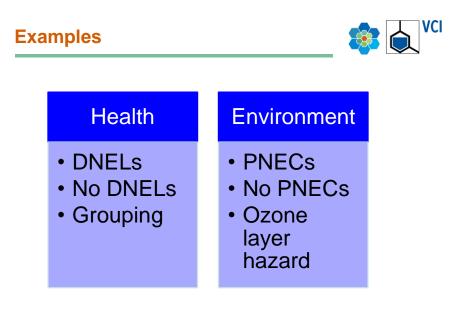


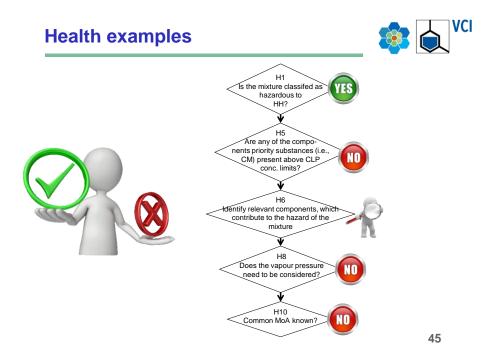
Calculate LCI for each of of the Ozone hazard components

LCI = Conc in mixture

Highest LCI is Lead Component for Ozone hazard







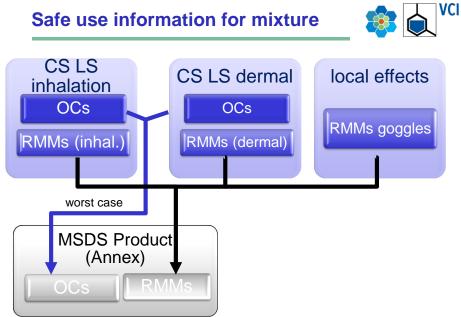
### Health example: DNELs available

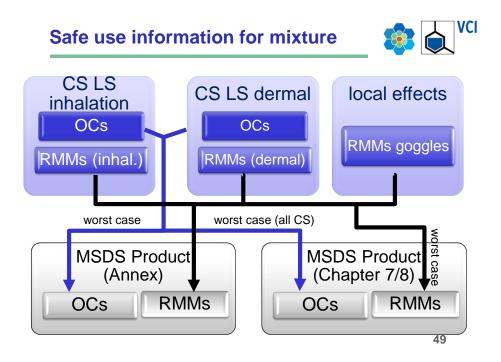


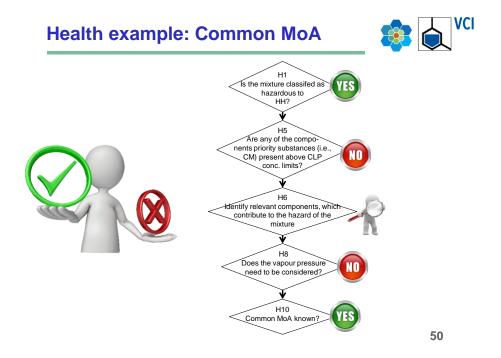
Relevant component	Comp. 1	Comp. 2	Comp. 3		
Concentration	45%	25%	10%		
DNEL inhalation (LT, systemic)	100mg/m <sup>3</sup>	30mg/m³	45mg/m³		
DNEL dermal (LT, systemic)	10mg/kg	4mg/kg	2mg/kg		
LCI = Concentration / DNEL (per RoE)					

LCI (inhalation)	0.45	0.8	0.2
LCI (dermal)	4.5	6.3	5.0
local effects	none	none	Skin corrosion Eye damage

Health example: not all DNELs available 🔹 🕁 🗸					
Relevant component	Comp. 1	Comp. 2	Comp. 3		
Concentration	20%	40%	40%		
DNEL inhalation	not relevant only class. for local effects	26mg/m <sup>3</sup>	N/A		
DNEL dermal		4mg/kg	N/A		
LC50		3mg/L	5mg/L		
LD50		50mg/kg	300mg/kg		
		LCI = Conc. / re	eference value		
LCI (inh): DNEL/LC50	-	1.5 / 13.3	- / 8		
LCI (der): DNEL/LD50	-	10 / 0.8	- / 0.1		
local effects	Eye irritation	none	none		



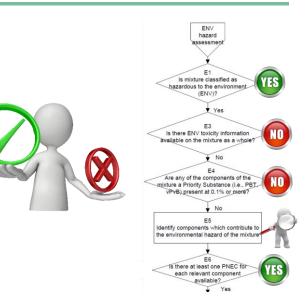




Health ex	_ 🕸 🔍 V		
Relevant component	Comp. 1	Comp. 2	Comp. 3
Concentration	50%	30%	20%
DNEL inhalation	3mg/m³	5mg/m³	1mg/m³
DNEL dermal	4mg/kg	10mg/kg	5mg/kg
	commo	on MoA	
LCI (inhalation)	16.7	6	20
LCI (dermal)	12.5	3	4
LCI group (inh.)	22	20	
LCI group (derm.)	15	4	
Adjusted conc.	67%	-	-

### ENV example: PNECs available

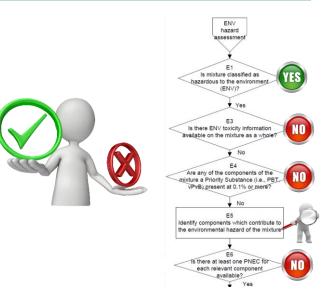




ENV exar	ENV example: PNECs available					
Relevant components	Component 1	Component 2	Component 3			
Concentration	30	2.5	20			
Lowest PNEC	0.0112 mg/L (PNEC <sub>freshwater</sub> )	0.03 mg/kg (PNEC <sub>soil</sub> )	<b>0.004 mg/kg</b> (PNEC <sub>sediment</sub> )			
Convert to mg/L	0.0112 mg/L	<b>0.45 mg/L</b> (0.03 x 1.5)	<b>0.001 mg/L</b> (0.004 / 4)			
Biodegradable status	Readily biodegradable	Not readily biodegradable	Not readily biodegradable			
	LCI (PNEC)	in mixture C (x 3*)				
LCI (PNEC) - env	<b>893.9</b> (30 / (0.0112 x 3))	<b>5.5</b> (2.5 / 0.45)	<b>2000</b> (20 / 0.001)			



### ENV example: PNECs NOT available



	ENV example: PNECs NOT available							
	Relevant components	Cyclohexane	n-Hex	ane	Naphtha, hydrotreated light			
	Concentration	30	2.5		20			
	Classification	Aquatic Acute 1 Aquatic Chronic 1	Aquatic Chronic 2		Aquatic Chronic 2			
	M factor(s)	M <sub>acute</sub> = 1 M <sub>chronic</sub> = 1	not appl	licable	not applicable			
		Classific Aquatic A Aquatic C Aquatic C Aquatic C Aquatic C Aquatic C	Acute 1 Chronic 1 Chronic 2 Chronic 3	Conc x I	tion of LCI M <sub>acute</sub> x 33 M <sub>chronic</sub> x 100 10			
	LCI = LCI <sub>acute</sub> + LCI <sub>chronic</sub>			Conc				
I	LCI (no PNEC) - env	<b>3990</b> (30 x 1 x 33) + (30 x 1 x 100)	<b>25</b> (2.5 x		<b>200</b> (20 × 10)			

### Safe use information for mixture



Relevant components	Component 1	Component 2	Component 3	
LCI	893.9	5.5	2000	
Concentration	30	2.5	20	
Modifying factor	MF = ∑LCI / LCIn	nax = (893.9 + 5.5 + 20	00) / 2000 = 1.45	
Cweighted	$C_{weighted}$ = Conc LC x MF = 20 x 1.45 = 29			
M <sub>safe</sub> Lead compound			33000 kg/d	
M <sub>safe</sub> product	$M_{safe}$ product = $M_{safe}$	LC / Cweighted = (33000	/ 29) = 113793 kg/d*	

\*relevant OCs and RMMs of the Lead Component are transferred to the mixture (e)SDS

#### **PBT & Ozone**

containing this substance.



- Rare cases
- A PBT compound (≥ 0.1%) is considered a "priority substance"
   Most likely, the same measures as recommended for the pure substance will have to be applied to a mixture
- The component hazardous to the ozone layer with the highest concentration in the mixture is identified as the Lead Component relating to this effect. Again, the same measures as recommended for the pure substance will have to be applied to a mixture containing this substance.





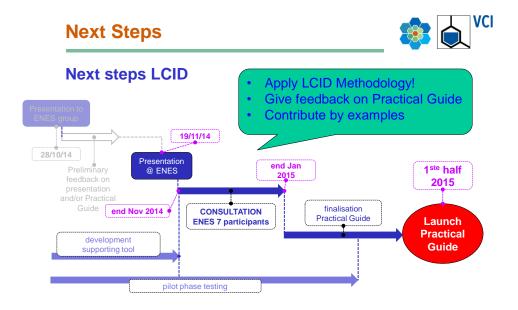


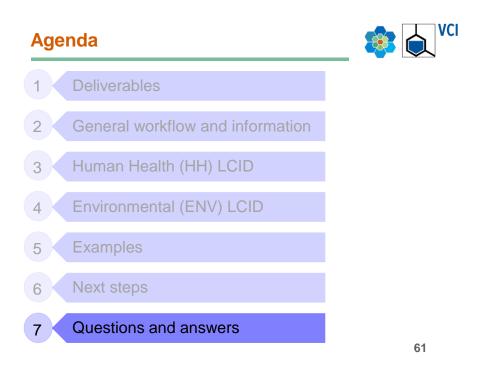


 $\Rightarrow$  Update of Practical Guide from 2010

**Next steps** 

- ⇒ Support for formulators in their tasks regarding safe use information for mixtures
- ⇒New LCID method chapters replace DPD+ approach
- $\Rightarrow$  Cefic/VCI contribution to CSR/ES Roadmap Action 4.4





# Questions





