

Comments on the proposed classification of Phenol, dodecyl-, branched  
Cas number: 121158-58-5

The Netherlands, 22-01-2013

**Any other hazard classes or endpoints**

**Aquatic environment**

*Biodegradation*

Page 98-99: The results of the ready biodegradability screening study show that the substance is not readily biodegradable. This result can be supported although in general, ready biodegradability screening tests have limited meaning for UVCB substances as the test cannot tell whether all constituents are equally degraded. We note the negative inherent study which supports the negative results from the ready biodegradability screening test.

*Aquatic Bioaccumulation*

Page 100-101: It is not clear if the reported BCF values are lipid normalized. If the reported BCF values are not lipid normalized, lipid normalized values should be provided.

Interpretation and discussion of the BCF test results is missing.

BCF values of 823 and 749 were obtained for 1.1 and 11.1 µg/L (respectively) treatment groups. Based on the information we conclude phenol, dodecyl-, branched, meets the CLP criteria BCF > 500 for bioaccumulation.

*Aquatic toxicity*

Pages 98-105: None of the robust study summaries for the aquatic toxicity studies say whether the test concentrations were within 20% of nominal throughout the study, but all results are based on nominal concentrations. Please confirm that the concentrations of the substance were maintained with the accepted threshold of at least 80 per cent of the nominal concentration throughout test for the key studies.

Page: 20: In the report from the Environmental Agency referenced within section 1.1 of part B in the CLH report, the results from some of the key studies used in this CLH report have been recalculated based on measured concentrations. Information on the test concentrations in the studies needs to be added and the reported recalculations should be taken into account for the key studies for C&L.

We agree with the proposed classification Aquatic Acute 1 and Aquatic Chronic 1. However, we do not agree with the proposed M-factor for acute toxicity. We propose that the M-factor for acute toxicity should be 10 based on the lowest value is 0.037 mg/l for invertebrate (*Daphnia magna*) and the substance is not rapidly degradable (also BCF > 500).

Data set	Fish	Invertebrate	Algae	Most stringent Classification	Remarks
Acute (LC50, mg/L)	40	0.037	0.36	Aquatic Acute 1; M=10	Based on acute invertebrate results
Chronic (NOEC, mg/L)	NA	0.0037	0.07	Aquatic Chronic 1: M=10	Based on available chronic results
Surrogate	Aquatic Chronic 3	NA	NA	Aquatic Chronic 3	Based on surrogate results. Substance is not rapid degradable and BCF > 500

Conclusion on acute aquatic toxicity classification	<b>Acute 1; M=10</b>	
Conclusion on chronic aquatic toxicity classification	<b>Chronic 1, M=10</b>	

- Aquatic acute toxicity data are available for all trophic levels. The lowest value is 0.037 mg/l for invertebrates. Classification is Aquatic Acute 1, H400, M=10
- Substance is not rapid degradable and BCF > 500. Chronic data is available for algae and aquatic invertebrates but not for fish.
- Based on surrogate data, classification is Aquatic chronic 3
- Based on the most stringent outcome long term classification results in Chronic 1 (M factor 10).

Proposal for concentrations limits under DSD should be made based on an LC50 value of 0.037 mg/L

#### **Other concerns**

Page 22: Phenol, nonyl-, branched (CAS 90481-04-2) is listed as one of the substance constituents in Table 6 (section 1.2, Part B) of the CLH report. A typical concentration of 0.6% (w/w) is reported with a concentration range  $\geq 0.5\%$  to  $\leq 4.7\%$ . Evidence from the literature reports the effects of nonylphenol as a clear a disruptor of the sex-hormone balance in fish. Have you taken into consideration the aquatic toxicity effects of nonylphenol in your report?

#### **Section 5.2.1 Adsorption/Desorption**

Page 99: There is inconsistency in the reported Koc/log Koc values in the table and in the text, please clarify what the correct value is.