CONSIDERATIONS OF ALTERNATIVE METHODS ON TESTING PROPOSALS IN YOUR REGISTRATION

Please complete this form and provide information for each of the points below.

If you have more than one testing proposal, please copy and paste the three bullet points within the same document and complete the details as appropriate for each testing proposal.

This document will be published on ECHA website along with the third party consultation on the testing proposal(s).

Public substance name: Ethanol, 2,2'-iminobis-, N-C12-18-alkyl derivs.
EC number: 276-014-8
CAS number: 71786-60-2

Date of considerations: 5 June 2019

- Hazard endpoint for which vertebrate testing was proposed:

  Reproductive toxicity (extended one-generation reproductive toxicity study) with the registered substance.

- Considerations that the general adaptation possibilities of Annex XI of the REACH Regulation were not adequate to generate the necessary information (instruction: please address all points below):

  - available GLP studies

  The following studies addressing reproduction toxicity are performed on this substance:
  - Developmental toxicity / teratogenicity, Oral, gavage, OECD 422, 2010
  - Developmental toxicity / teratogenicity, Prenatal Developmental Toxicity study in the Rat, OECD414, 2018
  - Developmental toxicity / teratogenicity, Prenatal Developmental Toxicity study in the Rat, OECD414

  However, these available studies either involve a screening, or do not allow for a full evaluation of possible toxicity to reproduction.
  Within the category, there is no information from full reproduction toxicity testing (2-generation or EOGRTS)

  - available non-GLP studies

  There is no non-GLP reproduction study available for this substance or category members or analogues.

  - historical human data

  There is no appropriate human data available to address this end point of possible effects on reproduction.

  - (Q)SAR

  There are overall no specific concerns for reproduction toxicity from QSARs. However, the structure is not well represented in the domains of the various QSARs, leading to limited validity. (QSAR Tollbox Profiling, DEREK and VEGA models: No DART alerts; TOPKAT: results to a positive reproduction alert, but presented ‘Structural Similar Compounds’ do not show much resemblance.

- in vitro methods

There are no validated and regulatory accepted in vitro alternative methods that can replace the full fertility/reproduction toxicity study. It is not possible, with in-vitro models, to account for the influence of the complex processes of absorption, distribution in the body, metabolism and excretion that occur in the whole animal, which will affect the toxic properties of the test substance.

- weight of evidence

The weight of evidence indicates a possible developmental toxicity concern based on results from available OECD 422 and OECD 414.

- grouping and read-across

The supporting category justification for the Primary Fatty Amnine Ethoxylates (consisting of Primary Fatty amines, ethoxylated with two mole ethylene oxide to form a tertiary amine structure) shows that Cross-reading between substances in this category is acceptable on the basis of similarities of composition, structures with same functional groups, and properties, which all lead to common biological activity. However, withing the category there is no data available allowing for a full assessment of potential reproduction toxicity of this substance.

- substance-tailored exposure driven testing [if applicable]

The use of the substance includes uses in consumer applications.

- [approaches in addition to above [if applicable]

No other approaches are considered. The oputcome of this study contributes to the assessment for reproduction toxicity for the whole catory.

- other reasons [if applicable]

Not applicable

- Considerations that the specific adaptation possibilities of Annexes VI to X (and column 2 thereof) were not applicable (instruction: free text):

We have checked but did not find any consideration of alternative methods