

COMPILED COMMENTS ON CLH CONSULTATION

Comments provided during consultation are made available in the table below as submitted through the web form. Please note that the comments displayed below may have been accompanied by attachments which are listed in this table and included in a zip file if non-confidential. Journal articles are not confidential; however they are not published on the website due to Intellectual Property Rights.

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Last data extracted on 03.08.2020

Substance name: diuron (ISO); 3-(3,4-dichlorophenyl)-1,1-dimethylurea

CAS number: 330-54-1

EC number: 206-354-4

Dossier submitter: Germany

GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
01.07.2020	Belgium	CEPE	Industry or trade association	1

Comment received

Please find the attached document on behalf of our industry, the remaining one using diuron in Europe. Diuron is one of the 3 remaining effective algaecide for dry-film preservation. The proposed classification of diuron as Carc Cat 1B would make it a candidate for exclusion under the BPR. The number of effective algaecides available is max 3 and these all have uncertain future. We need to keep them to allow effective control of a wide spectrum of microorganisms and avoid development of tolerance. Therefore, with regards to this proposal for the re-classification from Cat 2 to Cat 1B, we would like to suggest that careful attention is given to the evidence available, in particular to historical control data on the laboratory animal studies and on the relevance to Human of the effects observed in animal.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment CEPE position on diuron public consultation.pdf

Date	Country	Organisation	Type of Organisation	Comment number
21.07.2020	France		MemberState	2

Comment received

Toxicological endpoints have not been peer-reviewed by FR experts.

Other endpoints not open for comments:

-Could you please report the purity of active substance for all physico-chemical properties?

-The temperature of decomposition (330°C) could be added in the table 8 (boiling point).

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	3

Comment received

LANXESS would like to emphasize that Diuron is on the ECHA page Registry of CLH intentions until outcome „<https://echa.europa.eu/de/registry-of-clh-intentions-until-outcome/-/dislist/details/0b0236e182d03d27>“ still described as an active substance in Plant Protection Products. This is no longer valid. The Diuron EFSA dossier was withdrawn on 2019-05-15. This means that Diuron will not be used in the EU in the future anymore for plant protection.

Diuron is still supported under REACH REGULATION (EC) No 1907/2006 and under Biocidal Products REGULATION (BPR) (EU) No 528/2012.

Under the BPR Diuron is used as algicide for the protection of house facades, in other words as material protection product. Diuron is very useful to extend the service life of facade materials. The extension of the service life of materials reduces the consumption of raw materials, waste and energy. In this regard Diuron is contributing like every material protection product to the reduction of CO2 emissions. In other words it contributes to prevent the climate change.

Despite the known hazards of Diuron which has to be carefully evaluated under consideration of the Historical Control Data (HCD) Diuron has a significant benefit in its application under the BPR which is generally underestimated.

Please see also our attachment "Cover Letter" in the provided zip folders.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

Date	Country	Organisation	Type of Organisation	Comment number
29.07.2020	Germany	German Paint and Printing Ink Association (VdL)	Industry or trade association	4

Comment received

Diuron (CAS 330-54-1) is a substance, which is of high importance for the paint and coatings industry in Germany. We are aware that the public consultation on the proposed classification should only consider toxicological arguments on inherent properties and we refer to the work done by suppliers. Nevertheless, we would like to highlight the severe impact, which the supposed classification would have on our industry and especially the deco paint sector.

Diuron has been safely used for over 50 years as an herbicide in plant protection, and subsequently as an algicide in outdoor coatings to protect materials against film destruction and discoloration. The latter is the only remaining use. Therefore, there is significant experience and data concerning the use of Diuron as film preservative, which allows the conclusion that it can safely be used for this application also in the future. Dry-film preservation (PT 7) is most important for organic resin-based coatings and prevents the growth of microorganisms like algae and fungi on coated surfaces, such as the facades of buildings. Dry-film preservatives allow long lasting outdoor coatings; thus,

they contribute to circular economy objectives by reducing the use of materials, reducing the use of energy, and reducing waste generation, in line with the aims for the Green Deal.

Diuron is one of the key actives for dry-film preservation. The proposed classification as carcinogenic category 1B (Carc 1B) has the legal consequence that Diuron would fall under the exclusion criteria under the biocides legislation (regulation (EU) No. 528/2012, BPR) The number of effective algaecides for coatings available is very limited – basically three actives are remaining and all have an uncertain future due to the regulatory processes under the BPR. However, to allow effective control of a wide spectrum of microorganisms and avoid development of tolerance, a certain set of substances is needed. All biocides have their own technical characteristics and spectrum of activity. They are usually not replaceable one to one and several parameters must be considered: chemical and physical compatibility, stability in the wet stage and in the dry stage (such as pH on masonry), rate of degradation, leaching behaviour, intrinsic toxicity for Human Health and for the Environment etc. This explains why only a handful of fungicides is used on the market and less than a handful of algaecides. Due to the inherent costs and difficulties in supporting new biocide active substances under the BPR we do not expect any significant innovation in this area.

Therefore, with regards to this proposal for the re-classification from Carc 2 to Carc 1B, we would like to suggest that careful attention is given to the evidence available, in particular to historical control data on the laboratory animal studies and on the relevance to Human of the effects observed in animal.

We remain available to provide further information.

The German paint and printing ink association (VdL) represents over 200 – mostly mid-sized – manufacturers of paints, coatings and printing inks. The VdL stands for nearly 90 percent of this industry in Germany. In 2018 the German manufacturers of paints, coatings and printing inks realized sales of ca. 8 billion euros and employed ca. 25,000

CARCINOGENICITY

Date	Country	Organisation	Type of Organisation	Comment number
01.07.2020	Belgium	CEPE	Industry or trade association	5

Comment received

We would like to suggest that careful attention is given to the evidence available, in particular to historical control data on the laboratory animal studies and on the relevance to Human of the effects observed in animal.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment CEPE position on diuron public consultation.pdf

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	6

Comment received

Carcinogenicity Summary

Our comments are of particular relevance for the CLH report evaluation because the

dossier submitter stated that “no valid detailed historical control data (HCD) were available”. In these comments, we provide comprehensive HCD for the rat and mouse studies by the conducting laboratory in the relevant time frame. In addition, information on non-neoplastic endpoints in the carcinogenicity studies are discussed.

The carcinogenic potential of diuron was assessed in a reliable 2-year chronic toxicity/carcinogenicity study in rats, conducted according to EPA 83-1 guideline (comparable to OECD 453) (XXXXXXX, 1985). Wistar rats were randomly assigned to 4 groups of 50 males and 50 females each. Ten additional males and females per group were included for interim sacrifice at 12 months. Three dose groups were administered 25, 250, or 2500 ppm of diuron in the diet for 12 or 24 months. This corresponded to an actual test substance intake of 1.0, 10, and 111 mg/kg bw/day in males, and 1.7, 17, and 203 mg/kg bw/day in females.

In mice, the carcinogenic potential of diuron was tested in a 2-year combined chronic toxicity/carcinogenicity study conducted according to OECD 453 (XXXXXXXXXXXX, 1990). NMRI outbred mice (4 groups of 60 males and 60 females) were used in this study. Three dose groups received 25, 250 or 2500 ppm diuron in the diet. The concurrent control group received standard, un-treated diet. The overall study period was 24 months with an interim sacrifice after 12 months on 10 animals per sex and per group.

Based on the experimental data it is concluded that the available toxicological database shows a consistent picture, with urinary tract, and erythrocyte/spleen damage as consistent target organs of systemic toxicity.

In contrast, there is no consistent picture related to effects in the rat uterus, mouse ovary, and mouse mammary gland.

Where tumour observations were reported in other organs than the urinary bladder, these tumours were either within the range of the appropriate historical control data (rat uterine adenocarcinoma), or, where the historical control database is limited (mouse ovary luteoma, mouse mammary gland adenocarcinoma), there is for the ovary no obvious treatment related effect on the sex cord stromal tumour combined incidence. For the mammary gland there is one study in the limited historical control database that showed an incidence clearly higher than in the concurrent control group (5/39 (12.8%)), pointing to a variability that is of importance for the assessment of the diuron study.

In addition, there is a lack of consistency over species, a lack of pre- or non-neoplastic effects on the respective organs in rats and mice in all available repeated dose toxicity studies, and a lack of mechanistic evidence (no genotoxic potential, no respective response in mammary two-stage carcinogenesis studies in rats and mice, and no pre- or non-neoplastic findings in repeated dose toxicity studies in rats, mice, and dogs). These aspects put the biological relevance of the observations further in question.

Especially the human relevance of the findings is questionable. For the findings in the rat urinary bladder there is a clear dose-response relationship and the cytotoxic effect is clearly a high-dose effect. High-dose levels of diuron are required to produce the irritant metabolite(s) at urinary concentrations that will be cytotoxic to the urothelium, and these levels need to be sustained for lengthy time (Battalora, 2006). Given the expected pattern of human exposure the human relevance is highly debateable. Since humans are environmentally and occupationally exposed to low concentration levels of diuron that are not expected to produce urinary concentrations of metabolites that would be cytotoxic, it was concluded that humans will not have a carcinogenic response at usual occupational or environmental exposure levels (da Rocha et al., 2014). The incidence of neoplastic findings in the rat uterus (i.e. adenocarcinoma) was within the appropriate HCD range and follow-up statistics revealed only a borderline statistically significant trend. Thus, this finding is not considered as a biologically relevant, treatment-related effect. In accordance with a previous assessment (i.e. under the DSD), it should not be taken into account for the assessment of diuron. Moreover, body weight gain of Wistar rats was markedly decreased in high dose males (-18%) and high dose females (-21%), which clearly demonstrates that the MTD was exceeded for this species. Importantly, the

observations made at this high dose level regarding urinary bladder carcinoma and uterus adenocarcinoma, should be carefully evaluated and considered together with the excessive systemic toxicity.

The available experimental data together with the limited historical control database for NMRI mice do not allow a definitive assessment. The historical control database is limited because of the long study duration of the chronic toxicity/carcinogenicity study in NMRI mice with diuron. In connection with the long study duration, it needs to be taken into consideration that the number of surviving NMRI mice after 24 months of exposure to diuron was low and the current criteria regarding the number of survivors were undercut. Importantly, there is no epidemiological evidence of an increased tumour incidence in man, which could be attributed to diuron exposure (RAR, 2018).

Based on all available data, it is concluded that the tumour observations of rat uterus adenocarcinoma, mouse ovary luteoma and mouse mammary gland adenocarcinoma are sporadic findings of spontaneously occurring tumours in very aged animals without biological relevance for the assessment of the carcinogenic potential of diuron. A substance has to be classified in Carc. Cat. 1 only if there is sufficient evidence that the substance is presumed to have carcinogenic potential for humans. For diuron, however, the limited evidence available together with the uncertain human relevance of the high-dose effect of diuron on the urothelium substantiates, classification for Carc. Cat. 2, Suspected human carcinogen is reasonable, but not Cat. 1B, Presumed human carcinogen, according to Regulation (EC) No. 1272/2008.

Please see also our attachment "2020-07-30 DIURON CLH consultation LANXESS comments Carcinogenicity " in the respective confidential and public zip folders. Please see also the attachment "2018-07-04 Stropp Diuron Expert Statement HCD and Carcinogenicity confidential.pdf" in the confidential zip folder. Thanks.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

Date	Country	Organisation	Type of Organisation	Comment number
29.07.2020	Germany	German Paint and Printing Ink Association (VdL)	Industry or trade association	7

Comment received

With regards to this proposal for the re-classification from Carc 2 to Carc 1B, we would like to suggest that careful attention is given to the evidence available, in particular to historical control data on the laboratory animal studies and on the relevance to Human of the effects observed in animal.

MUTAGENICITY

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	8

Comment received

LANXESS agrees with BAuA that based on reliable in vitro and in vivo data the criteria for classification as laid down in the ECHA Guidance document on the application of the CLP Criteria are not fulfilled. Thus, based on reliable data as currently available, no

classification and labelling of Diuron for mutagenicity is warranted, according to the criteria in Annex I: 3.5.2.2 Table 3.5.1. This is further in line with the current status of Diuron as not classified for mutagenicity within Annex VI of CLP Regulation (EC) No 1272/2008.

Please see also our attachment "2020-07-30 DIURON CLH consultation LANXESS comments Mutagenicity" in the respective confidential and public zip folders. Please see also our attachment "1998-03-04 Herbold relevance of data from Agrawal 1996 Mutagenicity confidential" in the confidential zip folder. Thanks.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

OTHER HAZARDS AND ENDPOINTS – Acute Toxicity

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	9

Comment received

LANXESS concludes that sufficient evidence is provided from reliable and more actual data to set the LD50 of Diuron for acute oral toxicity as > 2000 mg/kg bw. Consequently LANXESS agrees with the CLH report, that Diuron warrants no classification and labelling regarding acute oral toxicity. LANXESS thus supports the proposal of the BAuA to delete the harmonized classification and labelling for acute oral toxicity as Cat 4 (H302).

LANXESS agrees with the BAuA that no classification and labelling according to CLP is warranted for Diuron with respect to acute dermal and acute inhalation toxicity, which is further in accordance with the harmonized non-classification of the substance for acute dermal and inhalation toxicity.

Please see also our attachment "2020-07-30 DIURON CLH consultation LANXESS comments Acute Toxicity " in the respective confidential and public zip folders. Thanks.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

OTHER HAZARDS AND ENDPOINTS – Specific Target Organ Toxicity Repeated

Exposure

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	10

Comment received

In agreement with the CLH report no sufficient evidence is provided from the sum of available reliable data that would support classification of Diuron as STOT RE 1 (H372). In addition, weight of evidence supports the current legal classification STOT RE 2 (H373) according to the CLP Regulation, which should therefore be kept.

In agreement with the CLH report, sufficient evidence is provided from the sum of reliable data available, identifying blood as a main target organ for Diuron toxicity. In agreement with the CLH report and taking into account the information from long-term studies the bladder also should be mentioned as target organ of concern.

Please see also our attachment "2020-07-30 DIURON CLH consultation LANXESS comments Repeated Dose Toxicity " in the respective confidential and public zip folders. Thanks.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

OTHER HAZARDS AND ENDPOINTS – Hazardous to the Aquatic Environment

Date	Country	Organisation	Type of Organisation	Comment number
28.07.2020	Belgium		MemberState	11
Comment received				
Based on the data in the CLH report, BE CA can support the proposed classification of Diuron for environmental hazards: - aquatic acute toxicity: on the basis of the 72hErC50 for the most sensitive species <i>Synechococcus leopoliensis</i> (algae) with 72hECr50 = 0.0078 mg/L (nom) Diuron is to be classified as Aquatic Acute 1, H400; M=100. - aquatic chronic toxicity: studies are available for the 3 trophic levels. Diuron is considered not rapidly degradable. The most sensitive species is the aquatic plant <i>Ceratophyllum demersum</i> . However we question the NOECgrowth rate of 0.000463 mg/L (lowest concentration tested). Although not statistically significant, 12.1% inhibition of the growth rate was seen at this concentration. Furthermore the 14dEC10 (= 0.000267 mg/l -geom. mean) was extrapolated and may contain remarkable uncertainties.				

Date	Country	Organisation	Type of Organisation	Comment number
21.07.2020	France		MemberState	12
Comment received				
Based on data from the CLH report, we agree with the classification proposal Aquatic Acute 1 (H400) M=100 and Aquatic Chronic 1 (H410) M=100 for the substance Diuron. The key study from Wenzel (2015) on <i>Synechococcus leopoliensis</i> , used to determine acute and long-term aquatic hazard, is considered valid and relevant for classification and labelling.				

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	Germany	LANXESS Deutschland GmbH	Company-Manufacturer	13
Comment received				
The Classification of Diuron as aquatic acute category 1 (H400) is justified. LANXESS agrees with the CLH report when supporting the current legal classification and labelling				

according to the CLP Regulation (EC) No 1272/2008.
LANXESS agrees with the CLH report, that a M factor of 100 is justified for acute aquatic toxicity

The Classification of Diuron as aquatic chronic category 1 (H410) is justified. LANXESS agrees with the CLH report when supporting the current legal classification and labelling according to the CLP Regulation (EC) No 1272/2008.

LANXESS agrees with the CLH report, that a M factor of 100 is justified for chronic aquatic toxicity.

No extra documents are provided in the zip folder.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip

ECHA note – An attachment was submitted with the comment above. Refer to confidential attachment 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip

Date	Country	Organisation	Type of Organisation	Comment number
31.07.2020	United Kingdom	Health and Safety Executive	National Authority	14

Comment received

diuron (EC 206-354-4; CAS 330-54-1)

We agree that diuron should be classified as Aquatic Acute 1 with an Acute M-factor of 100 based on the ErC50 for *Synechococcus leopoliensis*.

We also agree with the proposed Aquatic Chronic 1 classification and that the key studies driving this classification are those employed with *Synechococcus leopoliensis* and *Ceratophyllum demersum*. The study with *Elodea canadensis* could additionally be considered a key study in a weight of evidence for the chronic classification. The proposed Chronic M-factor of 100 is based on the NOErC for *Synechococcus leopoliensis* and the ErC10 for *Ceratophyllum demersum*. However, we consider that more information is required to confirm the Chronic M-factor.

Study using *Synechococcus leopoliensis*:

We note that there is a preference for EC10 values compared to NOEC values under CLP given ErC10 endpoints are statistically more robust and not a function of test design. The *Synechococcus leopoliensis* study was well conducted meeting validity criteria and a clear dose-response relationship was determined. In addition, the ErC10 95% confidence intervals support a well-defined ErC10 endpoint of 0.0037 mg/L (95% CI 0.0036 to 0.004 mg/L). On this basis, we consider the ErC10 for *Synechococcus leopoliensis* is the most appropriate long-term endpoint from the study in preference to the NOErC. This would result in a Chronic M-factor of 10.

Study using *Ceratophyllum demersum*:

The proposal considers the ErC10 is the preferential endpoint rather than the NOErC. However, we consider the reliability of the ErC10 is uncertain for the following reasons and more details on control growth / variability and measured concentrations are required to determine the most appropriate long-term endpoint from the study.

1. The ErC10 has been extrapolated beyond the dose-response range of the test

concentrations, noting there was 12% inhibition at the lowest treatment which was statistically considered the NOErC.

2. The study followed OECD TG 239 which was validated using *M. spicatum*, although the TG can be adapted for alternative free floating species. In relation to appropriate endpoints, TG 239 states that “estimates of EC10 and EC20 values are only reliable and appropriate in tests where coefficients of variation in control plants fall below the effect level being estimated, i.e. coefficients of variation should be <20% for robust estimation of an EC20”. We think this CoV for overall control growth rate should be derived to consider the level of control growth variation and whether an ErC10 endpoint is robust. Given the 95% confidence intervals for the reported ErC20, it may be that the EC20 of 0.00137 mg/l (95% CI 0.000343 to 0.00294 mg/L) is more appropriate for this species/study. The ErC20 would lead to an Aquatic Chronic 1 classification with a Chronic M-factor of 10.

3. We note the large range of initial measured concentrations from 86.6-121% of the nominal concentrations. At the end of the test, the test item recovery was 40.2-98% but it is unclear whether the low end reflected low treatments, and there is no information on the LOD. Therefore, more details of measured water concentrations and recoveries should be presented to assess whether the geometric mean measured endpoints are representative.

Study using *Elodea canadensis*:

The study also followed OECD TG 239 with a sediment phase. The ErC10 was extrapolated outside the range of the tested concentrations leading to relatively high uncertainty of the estimate. As per the study with *C. demersum*, it would be useful to consider the CoV for the overall growth rate of the controls to determine whether an ErC10/ErC20 endpoint is appropriate for this study using a non-standard test species. We recognise the presence of the sediment phase and low test item recovery means endpoint interpretation is difficult, however it would be useful to decide whether the determination of reliable mean measured concentrations (and endpoints) from the water phase could still make such a test suitable for aquatic hazard classification purposes, at least in a weight of evidence approach.

Date	Country	Organisation	Type of Organisation	Comment number
16.07.2020	Netherlands		MemberState	15
Comment received				
<p>Biodegradation</p> <p>According to the Dossier Submitter the substance diuron is considered as not 'readily biodegradable' by default because no study is available. We would like to point out that a ready biodegradability study (OECD 301 F) for diuron is available on the ECHA dissemination website (June 2020). The study was conducted under GLP conditions. No degradation (0%) for diuron was observed after 28 days of testing. Based on the available information on the ECHA website, the screening test appears to be reliable. If the reliability of the study can be confirmed, based on this study diuron can be regarded as not readily biodegradable.</p> <p>We agree with the Dossier Submitter that the substance diuron should be regarded as not rapidly biodegradable, based on the data available and weight of the evidence. If the ready biodegradability study test is considered reliable, diuron can be regarded as not rapidly degradable based on this study.</p>				

ECHA database: <https://echa.europa.eu/nl/registration-dossier/-/registered-dossier/13520/5/3/2/?documentUUID=ad6f02e3-acf6-43dd-8472-956b34e0c061>

Aquatic Toxicity classification

The most sensitive concentration for acute toxicity is based on a study of Wenzel, A. (2015) (ASA-001/4-10/C/1). Freshwater cyanobacteria (*Synechococcus Leopoliensis*) were exposed to nominal test concentrations of 0,1, 0,2 , 0,632, 2,00, 6,32 and 20 µg/l for 72h. The experimentally determined ErC50 is 7.88 µg/l based on nominal concentrations. One small remark is that the lowest test concentration (0,1 µg/l) is outside $\pm 20\%$ of the nominal concentrations, therefore, concentrations should be reported as geometric mean concentrations according to OECD Test guideline 201. It is unclear whether the measurements of the tested concentrations (0,1 µg/l) were exceeding or below 20% of nominal or if the tested concentration was in the range of the LOD. However, as only the lowest test concentration is outside the $\pm 20\%$ range, and all higher concentrations are within the range of $\pm 20\%$, we agree that the ErC50 is based on nominal concentrations, as the deviations in measured concentrations at a concentration of 0,1 µg/l do not affect the outcome of the ErC50. If, in addition, deviations were present at other test concentrations, we would have advised to use geometrical mean concentrations.

References

Wenzel, A. 2015 FRESHWATER CYANOBACTERIA, GROWTH INHIBITION TEST (OECD 201). DIURON (TECHNICAL): EFFECTS ON SYNECHOCOCCUS LEOPOLIENSIS, Report No.: ASA-001/4-10/C/1 Fraunhofer-Institute for Molecular Biology and Applied Ecology (IME), Schmallenberg, Germany, unpublished

PUBLIC ATTACHMENTS

1. 2020-07-31 DIURON CLH consultation LANXESS comments Public Attachments.zip [Please refer to comment No. 3, 6, 8, 9, 10, 13]
2. CEPE position on diuron public consultation.pdf [Please refer to comment No. 1, 5]

CONFIDENTIAL ATTACHMENTS

1. 2020-07-31 DIURON CLH consultation LANXESS comments Confidential Attachments.zip [Please refer to comment No. 3, 6, 8, 9, 10, 13]