File No: LTD/1770

May 2020

# NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS)

#### PUBLIC REPORT

## 3-Buten-2-one, 4-[(3R,6R)-2,2,3,6-tetramethylcyclohexyl]-, (3E)-rel-

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals (Notification and Assessment) Act 1989* (the Act) and Regulations. This legislation is an Act of the Commonwealth of Australia. The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) is administered by the Department of Health, and conducts the risk assessment for public health and occupational health and safety. The assessment of environmental risk is conducted by the Department of Agriculture, Water and the Environment.

This Public Report is available for viewing and downloading from the NICNAS website or available on request, free of charge, by contacting NICNAS. For requests and enquiries please contact the NICNAS Administration Coordinator at:

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Director NICNAS

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# **SUMMARY**

The following details will be published on our website:

ASSESSMENT REFERENCE	APPLICANT(S)	CHEMICAL OR TRADE NAME	HAZARDOUS CHEMICAL	INTRODUCTION VOLUME	USE
LTD/1770	Firmenich Limited	3-Buten-2-one, 4- [(3 <i>R</i> ,6 <i>R</i> )-2,2,3,6- tetramethylcyclohexyl]-, (3 <i>E</i> )- <i>rel</i> -	No	≤ 1 tonne per annum	Fragrance ingredient

# CONCLUSIONS AND REGULATORY OBLIGATIONS

## Hazard classification

Based on the available information, the notified chemical is not recommended for hazard classification according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

## Human health risk assessment

Under the conditions of the occupational settings described, the notified chemical is not considered to pose an unreasonable risk to the health of workers.

When used in the proposed manner, the notified chemical is not considered to pose an unreasonable risk to public health.

#### Environmental risk assessment

On the basis of the maximum import volume of 1 tonne per annum, the notified chemical is not considered to pose an unreasonable risk to the environment.

#### Recommendations

CONTROL MEASURES

Occupational Health and Safety

- A person conducting a business or undertaking at a workplace should implement the following safe work practices to minimise occupational exposure during handling of the notified chemical during reformulation:
  - Avoid contact with skin and eyes
  - Avoid inhaling aerosols or mists
- A person conducting a business or undertaking at a workplace should ensure that the following personal protective equipment is used by workers to minimise occupational exposure to the notified chemical during reformulation:
  - Respiratory protection if aerosols or mists are expected to be generated

Guidance in selection of personal protective equipment can be obtained from Australian, Australian/New Zealand or other approved standards.

- A copy of the SDS should be easily accessible to employees.
- If products and mixtures containing the notified chemical are classified as hazardous to health in accordance with the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)* as adopted for industrial chemicals in Australia, workplace practices and control procedures consistent with provisions of State and Territory hazardous substances legislation should be in operation.

Disposal

• Where reuse or recycling are not appropriate, dispose of the notified chemical in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

Emergency procedures

• Spills or accidental release of the notified chemical should be handled by physical containment, collection and subsequent safe disposal.

#### **Regulatory Obligations**

#### Secondary Notification

This risk assessment is based on the information available at the time of notification. The Director may call for the reassessment of the chemical under secondary notification provisions based on changes in certain circumstances. Under Section 64 of the *Industrial Chemicals (Notification and Assessment) Act (1989)* the notifier, as well as any other importer or manufacturer of the notified chemical, have post-assessment regulatory obligations to notify NICNAS when any of these circumstances change. These obligations apply even when the notified chemical is listed on the Australian Inventory of Chemical Substances (AICS).

Therefore, the Director of NICNAS must be notified in writing within 28 days by the notifier, other importer or manufacturer:

- (1) Under Section 64(1) of the Act; if
  - the importation volume exceeds one tonne per annum notified chemical;
  - the final use concentration of the notified chemical exceeds 0.08% in leave-on/rinse-off cosmetics, 0.7% in fine fragrances, 0.05% in household cleaning products or 0.5% in air fresheners.

or

- (2) Under Section 64(2) of the Act; if
  - the function or use of the chemical has changed from a fragrance ingredient, or is likely to change significantly;
  - the amount of chemical being introduced has increased, or is likely to increase, significantly;
  - the chemical has begun to be manufactured in Australia;
  - additional information has become available to the person as to an adverse effect of the chemical on occupational health and safety, public health, or the environment.

The Director will then decide whether a reassessment (i.e. a secondary notification and assessment) is required.

#### Safety Data Sheet

The SDS of the notified chemical provided by the notifier was reviewed by NICNAS. The accuracy of the information on the SDS remains the responsibility of the applicant.

# ASSESSMENT DETAILS

## 1. APPLICANT AND NOTIFICATION DETAILS

APPLICANT(S) Firmenich Limited (ABN: 86 002 964 794) 73 Kenneth Road BALGOWLAH NSW 2093

NOTIFICATION CATEGORY Limited-small volume: Chemical other than polymer (1 tonne or less per year)

EXEMPT INFORMATION (SECTION 75 OF THE ACT) Data items and details claimed exempt from publication: other names, analytical data, degree of purity, impurities and additives/adjuvants.

VARIATION OF DATA REQUIREMENTS (SECTION 24 OF THE ACT) Variation to the schedule of data requirements is claimed for adsorption/desorption, dissociation constant, flammability, explosive properties and oxidising properties.

PREVIOUS NOTIFICATION IN AUSTRALIA BY APPLICANT(S) NICNAS Permits

NOTIFICATION IN OTHER COUNTRIES USA (1992), China (2013), Canada (2005), Japan (2008), EU (2008) and Switzerland (2009)

## 2. IDENTITY OF CHEMICAL

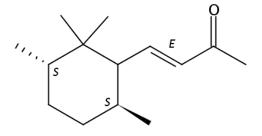
MARKETING NAME(S) 3-Buten-2-one, 4-[(3*R*,6*R*)-2,2,3,6-tetramethylcyclohexyl]-, (3*E*)-*rel*-

CAS NUMBER 762300-77-6

CHEMICAL NAME 3-Buten-2-one, 4-[(3*R*,6*R*)-2,2,3,6-tetramethylcyclohexyl]-, (3*E*)-*rel*-

 $\begin{array}{l} Molecular \ Formula \\ C_{14}H_{24}O \end{array}$ 

STRUCTURAL FORMULA



MOLECULAR WEIGHT 208.34 g/mol

ANALYTICAL DATA Reference NMR, IR, GC, GC-MS, UV spectra were provided.

## 3. COMPOSITION

Degree of Purity > 90%

## 4. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AT 20 °C AND 101.3 kPa: colourless to pale yellow liquid

Property	Value	Data Source/Justification
Melting Point/Freezing Point	-2 °C	Measured
Boiling Point	274 °C at 96.9 kPa	Measured
Density	917 kg/m <sup>3</sup> at 20 °C	Measured
Vapour Pressure	$1.835 \times 10^{-4}$ kPa at 25 °C	Measured
Water Solubility	4.196 × 10 <sup>-3</sup> g/L at 20 °C 4.144 × 10 <sup>-3</sup> g/L at 20 °C	Measured
Fat Solubility	Soluble in all proportions at 37 °C	Measured
Hydrolysis as a Function of pH	Hydrolytically stable	Measured
Partition Coefficient (n-octanol/water)	Isomer 1: log Pow = 4.498 at 25 °C Isomer 2: log Pow = 4.392 at 25 °C Isomer 3: log Pow = 4.369 at 25 °C	Measured
Adsorption/Desorption	$\log \text{Koc} = 3.69$	Calculated by US EPI Suite
Flash Point	126-127 °C at 97 kPa	Measured
Flammability	Not determined	Not expected to be highly flammable based on flash point
Autoignition Temperature	> 220 °C	Measured
Explosive Properties	Not determined	Contains no functional groups that imply explosive properties
Oxidising Properties	Not determined	Contains no functional groups that imply oxidising properties

DISCUSSION OF PROPERTIES

For full details of tests on physical and chemical properties, refer to Appendix A.

Reactivity

The notified chemical is expected to be stable under normal conditions of use.

#### Physical hazard classification

Based on the submitted physico-chemical data depicted in the above table, the notified chemical is not recommended for hazard classification according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

The notified chemical has a flash point of 126 °C which is greater than 93 °C. Based on *Australian Standard AS1940* definitions for combustible liquid, the notified chemical may be considered as a Class C2 combustible liquid if the chemical has a fire point below the boiling point.

#### 5. INTRODUCTION AND USE INFORMATION

MODE OF INTRODUCTION OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

The notified chemical will be imported into Australia either in the neat form or as a component in fragrance formulations ( $\leq 2\%$  concentration) or finished consumer products ( $\leq 0.7\%$  concentration).

MAXIMUM INTRODUCTION VOLUME OF NOTIFIED CHEMICAL (100%) OVER NEXT 5 YEARS

Year	1	2	3	4	5
Tonnes	$\leq 1$				

PORT OF ENTRY Sydney

#### TRANSPORTATION AND PACKAGING

The imported notified chemical or products containing it will be transported by road via truck to the notifier's warehouse or customers' facilities for storage or reformulation. Fragrance formulations containing the notified

chemical will be imported and distributed in tightly closed lacquered drums of varying sizes: 180, 100, 50, 25, 10 or 5 kg. End-use products will be packaged in containers suitable for retail sale.

#### USE

The notified chemical will be used as a fragrance component in a variety of cosmetic and household products at typical final use concentrations of  $\leq 0.08\%$  in leave-on/rinse-off cosmetics,  $\leq 0.7\%$  in fine fragrances,  $\leq 0.05\%$  in household cleaning products, and  $\leq 0.5\%$  in air fresheners.

#### OPERATION DESCRIPTION

The reformulation procedures for incorporating the notified chemical into end-use products will likely vary depending on the nature of the cosmetic and personal care/household cleaning products formulated. This may involve both automated and manual processes including transferring and blending the notified chemical with other formulations. However, a typical blending operation will be highly automated and occur in a fully enclosed/contained environment, followed by automated filling using sealed delivery systems into containers of various sizes.

The end-use products containing the notified chemical may be used by consumers and professionals such as hairdressers, workers in beauty salons or cleaners. Depending on the nature of the product, these could be applied in a number of ways, such as by hand, using an applicator or sprayed.

## 6. HUMAN HEALTH IMPLICATIONS

#### 6.1. Exposure Assessment

#### 6.1.1. Occupational Exposure

CATEGORY OF WORKERS

Category of Worker	Exposure Duration (hours/day)	Exposure Frequency (days/year)
Transport and warehouse workers	unknown	unknown
Mixing	4	2
Drum handling	4	2
Drum cleaning/washing	4	2
Maintenance	4	2
Quality control	0.5	1
Packaging	4	2
Professional end users	not specified	not specified

EXPOSURE DETAILS

#### Transport and storage

Transport and storage workers may come into contact with the notified chemical in neat form or as a component of the imported preparations, only in the event of accidental rupture of containers. Incidental dermal or ocular exposure to the notified chemical may occur via during the clean-up of accidental spills.

#### Formulation of end use products

During reformulation, dermal, ocular and perhaps inhalation exposure (if aerosols or mists are formed) of workers to the notified chemical (at up to 100% concentration) may occur during weighing and transfer stages, equipment preparation, blending, quality control analysis and cleaning and maintenance of equipment. Inhalation exposure to vapours of the notified chemical is not expected given the low vapour pressure of the notified chemical. Exposure is expected to be minimised through the use of local exhaust ventilation, automated and enclosed systems, including sealed delivery systems and through the use of personal protective equipment (PPE) such as gloves, respirator, eye protection and protective clothing.

#### Beauty care and cleaning professionals

Exposure to the notified chemical in end-use products (at  $\leq 0.7\%$  concentration) may occur in professions where the services provided involve the application of cosmetic and personal care products to clients (e.g. hairdressers, workers in beauty salons) or in the cleaning industry. Such professionals may use PPE to minimise repeated exposure, and good hygiene practices are expected to be in place. If PPE is used, exposure of such workers is

expected to be of a similar or lesser extent than that experienced by consumers using products containing the notified chemical.

## 6.1.2. Public Exposure

There will be widespread and repeated exposure of the public to the notified chemical through the use of a variety of cosmetic and household products at various concentrations. The principal route of exposure will be dermal, while ocular and inhalation exposure is also possible, particularly if products are applied by spray.

Data on typical use patterns of product categories in which the notified chemical may be used are shown in the following tables (SCCS, 2012; Cadby *et al.*, 2002; ACI, 2010; Loretz *et al.*, 2006). For the purposes of the exposure assessment, Australian use patterns for the various product categories are assumed to be similar to those in Europe. In the absence of dermal absorption data, a dermal absorption (DA) of 100% was assumed for the notified chemical (ECHA, 2017). For the inhalation exposure assessment, a 2-zone approach was used (Steiling *et al.*, 2014; Rothe *et al.*, 2011; Earnest, Jr, 2009). An adult inhalation rate of 20 m<sup>3</sup>/day (enHealth, 2012) was used and it was conservatively assumed that the fraction of the notified chemical inhaled is 50%. A lifetime average female body weight (BW) of 64 kg (enHealth, 2012) was used for calculation purposes.

#### Cosmetic products (Dermal exposure)

Product type	<b>Amount</b> (mg/day)	C (%)	<b>RF</b> (unitless)	Daily systemic exposure (mg/kg bw/day)
Body lotion	7,820	0.08	1	0.0978
Face cream	1,540	0.08	1	0.0193
Hand cream	2,160	0.08	1	0.0270
Fragrances	750	0.7	1	0.0820
Deodorant (non-spray)	1,500	0.08	1	0.0188
Shampoo	10,460	0.08	0.01	0.0013
Hair conditioner	3,920	0.08	0.01	0.0005
Shower gel	18,670	0.08	0.01	0.0023
Hand wash soap	20,000	0.08	0.01	0.0025
Hair styling products	4,000	0.08	0.1	0.0050
Total				0.2564

C = concentration (%); RF = Retention Factor

Daily Systemic Exposure =  $(Amount \times C \times RF \times dermal absorption)/body weight$ 

#### Hair spray (inhalation exposure)

Product type	Amount	C	Inhalation Rate	Exposure Duration (Zone 1)	Exposure Duration (Zone 2)	Fraction Inhaled	Volume (Zone 1)	Volume (Zone 2)	Daily systemic exposure
	(g/day)	(%)	(m <sup>3</sup> /day)	(min)	(min)	(%)	(m <sup>3</sup> )	(m <sup>3</sup> )	(mg/kg bw/day)
Hairspray	9.89	0.05	20	1	20	50	1	10	0.0016

Total Daily systemic exposure = Daily systemic exposure in Zone 1 [(amount  $\times C \times$  inhalation rate  $\times$  exposure duration (zone 1)  $\times$  fraction inhaled)/(volume (zone 1)  $\times$  body weight)] + Daily systemic exposure in Zone 1 [(amount  $\times C \times$  inhalation rate  $\times$  exposure duration (zone 2)  $\times$  fraction inhaled)/(volume (zone 2)  $\times$  body weight)]

*Household products (Indirect dermal exposure – from wearing clothes)* 

Product type	Amount (g/use)	С	Product	Percent	Daily systemic
		(%)	Retained (PR)	Transfer (PT)	exposure
			(%)	(%)	(mg/kg bw/day)
Laundry liquid	230	0.05	0.95	10	0.0017
Fabric softener	90	0.05	0.95	10	0.0007
Total					0.0024

Daily Systemic Exposure =  $(Amount \times C \times PR \times PT)/body$  weight

Household products (Direct dermal exposure – from wearing clothes)

Product type	Frequency (use/day)	C (%)	Contact area (cm <sup>2</sup> )	Product use C (g/cm <sup>3</sup> )	Film thickness (cm)	Time scale factor	Daily systemic exposure (mg/kg bw/day)
Laundry liquid	1.43	0.05	1,980	0.01	0.01	0.007	0.0000

Product type	Frequency (use/day)	C (%)	Contact area (cm <sup>2</sup> )	Product use C (g/cm <sup>3</sup> )	Film thickness (cm)	Time scale factor	Daily systemic exposure (mg/kg bw/day)
Dishwashing liquid	3	0.05	1,980	0.009	0.01	0.03	0.0001
All-purpose cleaner	1	0.05	1,980	1	0.01	0.007	0.0011
Total							0.0012

Daily Systemic Exposure = (Frequency  $\times$  C  $\times$  Contact area  $\times$  Product Use Concentration  $\times$  Film Thickness on skin  $\times$  Time Scale factor  $\times$  dermal absorption)/body weight

The worst case scenario estimation using these assumptions is for a person who is a simultaneous user of all products listed in the above tables that contain the notified chemical. This would result in a combined internal dose of 0.2616 mg/kg bw/day. It is acknowledged that inhalation exposure to the notified chemical from use of other cosmetic and household products (in addition to hair spray) may occur. However it is considered that the combination of conservative hair spray inhalation exposure assessment parameters, (in particular assuming an airspace volume of 1 m<sup>3</sup> in zone 1), and the aggregate exposure form the use of the dermally applied products (which assumes a conservative 100% absorption rate), is sufficiently protective to cover additional inhalation exposure to the notified chemical from use of other spray cosmetic and household products with lower exposure factors (e.g. air fresheners).

## 6.2. Human Health Effects Assessment

The results from toxicological investigations conducted on the notified chemical and an analogue are summarised in the following table. For full details of the studies, refer to Appendix B.

Endpoint	Result and Assessment Conclusion
Rat, acute oral toxicity	LD50 > 2000 mg/kg bw; low toxicity
Rat, acute dermal toxicity	LD50 > 2000  mg/kg bw; low toxicity
Skin Corrosion – in vitro EpiDerm <sup>TM</sup> skin corrosion test	non-corrosive
Rabbit, skin irritation	slightly irritating
Rabbit, eye irritation	slightly irritating
Guinea pig, skin sensitisation – Magnusson and Kligman	no evidence of sensitisation
Rat, repeat dose oral toxicity – 90 days*	NOAEL = 30 mg/kg bw/day
Mutagenicity – bacterial reverse mutation	non mutagenic
* A 1 1 - 4 -	

\* Analogue data

#### **Toxicokinetics**

No data on toxicokinetics for the notified chemical was provided. For dermal absorption, molecular weights below 100 g/mol are favourable for absorption and molecular weights above 500 g/mol do not favour absorption (ECHA, 2017). Dermal uptake is likely to be moderate to high if the water solubility is between 100-10,000 mg/L and the partition coefficient (log P) values between 1 and 4 (ECHA, 2017). Based on the low molecular weight (< 500 g/mol) and partition coefficient (log Pow = 4.369 - 4.498 at 25 °C) of the notified chemical, there is potential for the chemical to cross biological membranes.

#### Acute toxicity

The notified chemical is of low acute oral and dermal toxicity based on studies conducted in rats.

#### Irritation

Based on the results in *an in vitro* EpiDerm<sup>TM</sup> skin corrosion test, the notified chemical is considered to be non-corrosive.

The notified chemical was found to be slightly irritating to the skin and to eyes in studies conducted in rabbits.

#### Sensitisation

The notified chemical was not a skin sensitiser when tested in guinea pigs in a maximisation test (induction at 25% concentration (intradermal) and 100% concentration (topical) and challenge by topical administration at up to 100% concentration).

#### Repeated dose toxicity

No repeated dose toxicity data were submitted for the notified chemical. In a repeated dose oral (gavage) toxicity study an analogue chemical (3-Buten-2-one, 3-methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-, CAS No. 127-51-5) was administered to rats at 5, 30 and 500 mg/kg bw/day for 90 days (Politano *et al.*, 2012). The systemic No Observed Adverse Effect Level (NOAEL) was established as 30 mg/kg bw/day, based on statistically significant changes in blood chemistry parameters (reduced aspartate aminotransferase, and increased cholesterol, creatinine, and total protein) observed in both sexes at 500 mg/kg bw/day, statistically significant increases in liver and kidney weights observed in both sexes and in spleen weights observed in males at 500 mg/kg bw/day, adaptive hepatocyte enlargement observed in both sexes at 500 mg/kg bw/day, and thyroid and bone marrow histopathological changes observed in males at 500 mg/kg bw/day (Politano *et al.*, 2012).

#### Mutagenicity

The notified chemical was negative in two bacterial reverse mutation assays.

#### Health hazard classification

Based on the available information, the notified chemical is not recommended for hazard classification according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

#### 6.3. Human Health Risk Characterisation

#### 6.3.1. Occupational Health and Safety

#### Reformulation

Workers may experience dermal, ocular and perhaps inhalation exposure to the notified chemical at  $\leq 100\%$  concentration during reformulation. Given the notified chemical is a slight skin and eye irritant caution should be exercised when handling the notified chemical during reformulation processes. The use of local ventilation, enclosed/automated processes and PPE (i.e. protective clothing, safety glasses, impervious gloves and respiratory protection, if inhalation exposure may occur) are expected to minimise the potential for exposure.

Therefore, under the conditions of the occupational settings described, the risk to workers from use of the notified chemical is not considered to be unreasonable.

#### End-Use

Cleaners and beauty care professionals will handle the notified chemical at  $\leq 0.7\%$  concentration, similar to public use. Such professionals may use PPE to minimise repeated exposure, and good hygiene practices are expected to be in place. Therefore, the risk to workers who use products containing the notified chemical is expected to be of a similar or lesser extent than consumers who use such products on a regular basis. For details of the public health risk assessment see section 6.3.2 below.

#### 6.3.2. Public Health

Members of the public may experience repeated exposure to the notified chemical through the use of cosmetic and household products containing the notified chemical at  $\leq 0.7\%$  concentration. The main route of exposure is expected to be dermal and inhalation, with some potential for accidental ocular or oral exposure.

#### Eye and skin irritation

The notified chemical is a slight skin and eye irritant. However, risk of eye and skin irritation effects are not expected at the proposed low concentrations in end-use products ( $\leq 0.7\%$ ).

#### Repeated dose toxicity

The repeat dose toxicity potential was estimated by calculation of the margin of exposure (MoE) of the notified chemical using the worst case exposure scenario from use of multiple products as 0.2616 mg/kg bw/day (see Section 6.1.2). Using the NOAEL of 30 mg/kg bw/day derived from a 90-day repeated dose oral toxicity study on an analogue chemical, the margin of exposure (MOE) was estimated to be 114. A MOE value  $\geq$  100 is generally considered to be acceptable for taking into account intra- and inter-species differences.

When used in the proposed manner, the notified chemical is not considered to pose an unreasonable risk to public health.

## 7. ENVIRONMENTAL IMPLICATIONS

#### 7.1. Environmental Exposure & Fate Assessment

## 7.1.1. Environmental Exposure

#### RELEASE OF CHEMICAL AT SITE

The notified chemical will be imported into Australia either in finished consumer products, or in the neat form or as a component in fragrance formulations for reformulation into finished products. In general, the reformulation processes are expected to involve blending operations that will be highly automated and occur in an enclosed system, followed by automated filling of the finished products into end-use containers. According to the notifier, the liquid waste containing the notified chemical from reformulation equipment washing will be reused. Empty import containers containing residual notified chemical up to 0.1% of the import volume as estimated by the notifier, will either be recycled or disposed of through an approved waste management facility. Accidental spills of the notified chemical government regulations.

#### RELEASE OF CHEMICAL FROM USE

The majority of the notified chemical are expected to be released to sewers across Australia as a result of its use in cosmetic and household products, which are washed off hair and skin of consumers as well as from cleaning activities.

#### RELEASE OF CHEMICAL FROM DISPOSAL

Empty end-use containers are disposed of through domestic garbage disposal and are expected to enter recycling facility or landfill.

#### 7.1.2. Environmental Fate

The ready biodegradation test conducted on the notified chemical indicates that it is not readily biodegradable (no degradation over 28 days). However, the photolysis test conducted on the notified chemical reveals it underwent direct photodegradation with calculated half-lives in Australian natural waters ranged from 1 to 45 days. For details of the biodegradation and photodegradation studies, refer to Appendix C.

Following its use in cosmetic and household products, the majority of the notified chemical are expected to enter sewers across Australia. It is expected to be partly removed by partition to sludge at sewage treatment plant before releasing to surface waters. A small proportion of the notified chemical may be released to land when effluent is used for irrigation, or when sewage sludge is used for soil remediation. A minor amount of the notified chemical may also be disposed of to landfill as collected spills and empty container residues. In landfill, soil or sludge, the notified chemical is expected to have moderate mobility based on its calculated log Koc. The notified chemical in surface waters, soil, or landfill is expected to further photodegraded. The photodegradation products are expected to eventually transform into carbon dioxide and water.

#### 7.1.3. Predicted Environmental Concentration (PEC)

A predicted environmental concentration (PEC) worst case scenario has been calculated. It was assumed that 100% of the annual import quantity of the notified chemical is released to the sewer from washing off hair and skin of consumers as well as from cleaning activities over 365 days/year, with no removal of the notified chemical by sewage treatment plant (STP) processes. The extent to which the notified chemical is removed from the effluent in STP processes based on the properties of the notified chemical has not been considered for the worst-case scenario.

Predicted Environmental Concentration (PEC) for the Aquatic Compartment		
Total Annual Import/Manufactured Volume	1,000	kg/year
Proportion expected to be released to sewer	100	%
Annual quantity of chemical released to sewer	1,000	kg/year
Days per year where release occurs	365	days/year
Daily chemical release:	2.74	kg/day
Water use	200	L/person/day
Population of Australia (Millions)	24.386	million
Removal within STP	0%	

STP effluent re-use for irrigation occurs throughout Australia. The agricultural irrigation application rate is assumed to be 1000 L/m<sup>2</sup>/year (10 ML/ha/year). The notified chemical in this volume is assumed to infiltrate and accumulate in the top 10 cm of soil (density 1500 kg/m<sup>3</sup>). Using these assumptions, irrigation with a concentration of 0.562  $\mu$ g/L may potentially result in a soil concentration of approximately 3.745  $\mu$ g/kg. Assuming accumulation of the notified chemical in soil for 5 and 10 years under repeated irrigation, the concentration of notified chemical in the applied soil in 5 and 10 years may be approximately 18.73  $\mu$ g/kg and 37.45  $\mu$ g/kg, respectively.

## 7.2. Environmental Effects Assessment

No ecotoxicity data were submitted for this limited notification.

## 7.2.1. Predicted No-Effect Concentration

The Predicted No-Effect Concentration (PNEC) was not calculated as no ecotoxicity data were submitted.

## 7.3. Environmental Risk Assessment

The Risk Quotient (PEC/PNEC) was not calculated as no ecotoxicity data were submitted. On the basis of its degradability and the maximum import volume of 1 tonne per annum, the notified chemical is not considered to pose an unreasonable risk to the environment.

# **APPENDIX A: PHYSICAL AND CHEMICAL PROPERTIES**

Melting Point/Fre	ezing Point	$-2 \pm 0.5$ °C				
Method Remarks Test Facility	OECD TG 102 Melting Point/Melting Range Determined by observation of solidification of the liquid test substance Firmenich (2004)					
<b>Boiling Point</b>		274 ± 2 °C at 96.9 kPa				
Method Remarks Test Facility	OECD TG 103 Boiling Point Determined using boiling capillary tube containing a temperature sensor Firmenich (2004)					
Density		917 kg/m <sup>3</sup> at 20 °C				
Method Remarks Test Facility	OECD TG 109 Dens Oscillating densitime Firmenich (2004)	sity of Liquids and Solids. eter method				
Vapour Pressure		1.835 × 10 <sup>-4</sup> kPa at 25 °C				
Method Remarks Test Facility	OECD TG 104 Vapour Pressure Dynamic measurement method Firmenich (1995)					
Water Solubility Study 1		4.196 mg/L at 20 °C				
Method Remarks Test Facility	EEC Annex V, Directive 84/449/EEC A.6 Water Solubility. Flask Method TLL (1992a)					
Water Solubility	Study 2	4.14 mg/L at 20 °C				
Method Remarks Test Facility	Directive 92/69/EEC Flask Method Firmenich (2007)	CA.6 Water Solubility.				
Fat Solubility		Soluble in all proportions at 37 °C				
Method Remarks Test Facility	EEC Annex V, Directive 84/449/EEC A.7 Fat Solubility. Flask Method TLL (1992a)					
Hydrolysis as a F	unction of pH					
Method	OECD TG 111 Hydr	rolysis as a Function of pH.				
рН		$T(^{\circ}C)$ $t_{\frac{1}{2}}$ (year)				
2		40 > 1				
5		40 > 1				
7		40 > 1 40 > 1				
8.5		40 > 1				

40

Remarks Test Facility

The test substance is hydrolytically stable. Firmenich (2014)

12

> 1

Partition Coeffici octanol/water)	ient (n-   Isomer 1: log Pow = 4.498 at 25 °C     Isomer 2: log Pow = 4.392 at 25 °C     Isomer 3: log Pow = 4.369 at 25 °C
Method Remarks Test Facility	OECD TG 123 Partition Coefficient (n-octanol/water) Slow Stirring Method Dr U Noack-Laboratorien (2015)
Flash Point	$126 \pm 2$ °C at 97 kPa
Method Remarks Test Facility	EC Council Regulation No 440/2008 A.9 Flash Point. Determined using a Rapid Flash Tester Firmenich (2004)
Autoignition Ten	perature > 220 °C

MethodEC Council Regulation No 440/2008 A.15 Auto-Ignition Temperature (Liquids and Gases)Test FacilityFirmenich (2008)

# **APPENDIX B: TOXICOLOGICAL INVESTIGATIONS**

## **B.1.** Acute toxicity – oral

TEST SUBSTANCE	Notified chemical
METHOD	Similar to OECD TG 401 Acute Oral Toxicity – Limit Test
Species/Strain	Rat/Crl:CD(SD)BR
Vehicle	Polyethylene glycol 400
Remarks - Method	No significant protocol deviations

#### RESULTS

Group	Number and Sex	Dose	Mortality		
-	of Animals	mg/kg bw			
1	5 per sex	2000	0/10		
LD50	> 2,000 mg/kg bw				
Signs of Toxicity	Signs of systemic were noted on the da		d posture and piloerection		
Effects in Organs	No abnormalities we	ere noted at necropsy.			
Remarks - Results	The animals showed expected body weight gain over the obse period.				
CONCLUSION	The notified chemic	al is of low toxicity via the	oral route.		
TEST FACILITY	TLL (1992b)				
B.2. Acute toxicity – dermal					
TEST SUBSTANCE	Notified chemical				
Method	Similar to OECD TO	G 402 Acute Dermal Toxic	ity – Limit Test		
Species/Strain	Rat/Crl:CD(SD)BR		-		
Vehicle	None				
Type of dressing	Semi-occlusive				

#### RESULTS

Remarks - Method

Group	Number and Sex	Dose	Mortality
-	of Animals	mg/kg bw	-
1	5 per sex	2000	0/10

No significant protocol deviations

LD50	> 2,000 mg/kg bw
Signs of Toxicity - Local	Skin irritation of varying degree was noted at and around the application site in most animals.
Signs of Toxicity - Systemic	Perinasal staining was noted on the day of dosing and slight piloerection were noted on day 5.
Effects in Organs	Skin irritation effects were confirmed at necropsy. No other abnormalities were noted at necropsy.
Remarks - Results	The animals showed expected body weight gain over the observation period.
CONCLUSION	The notified chemical is of low toxicity via the dermal route.
TEST FACILITY	TLL (1991a)

## B.3. Skin Corrosion – *in vitro* EpiDerm<sup>TM</sup> skin corrosion test

TEST SUBSTANCE	Notified chemical
Method	OECD TG 431 In vitro Skin Corrosion - Human Skin Model Test EpiDerm <sup>™</sup> Reconstructed Human Epidermis Model
Vehicle	None
Remarks - Method	No significant protocol deviations. The negative control was sterile
	distilled water and the positive control was 8.0 N Potassium hydroxide.

## RESULTS

Test Material ——	Mean OD <sub>570</sub> of Tr	iplicate Tissues	Relative Mean Viability (%)		
Test Material —	3 min	60 min	3 min	60 min	
Negative control	1.895	1.991	100	100	
Test substance	2.299	2.303	121.3	115.7	
Positive control	0.298	0.278	15.7	14	
OD = optical density					
Remarks - Results	$\geq 15\%$ after	ne mean tissue viabilit 60 min exposure, the cording to the test guide	test substance is no	t predicted to be	
	Positive and	negative controls perfo	ormed as expected.		
CONCLUSION	The notified conditions of	l chemical was conside f the test.	red non-corrosive to t	he skin under the	
TEST FACILITY	SPL (2005a	)			
B.4. Irritation – skin					
TEST SUBSTANCE	Notified ch	emical			
METHOD Species/Strain Number of Animals Vehicle Observation Period Type of Dressing Remarks - Method	Rabbit/Nev 4 None 14 days Semi-occlu	DECD TG 404 Acute Do Zealand White sive ant protocol deviations	ermal Irritation/Corros	ion	
RESULTS					

#### RESULTS

Lesion	Mean Score*			:	Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period
	1	2	3	4			
Erythema/Eschar	1.7	2	2.3	2	3	> 14 days	1
Oedema	1.7	2	2.3	1.3	3	< 7 days	0

\* Calculated on the basis of the scores at 24, 48, and 72 hours for EACH animals.

Remarks - Results

No mortality or signs of systemic toxicity were observed.

Erythema and oedema were noted from 1 hour and 24 hours after dosing and persisted until the 72-hour observation. Oedema was absent in all animals and mild and moderate erythema remained in 2 animals at the 7day observation. At the 14-day observation, 3 out 4 animals has fully recovered and mild erythema persisted in the remaining animal.

CONCLUSION	The notified chemical is slightly irritating to the skin.
TEST FACILITY	TLL (1992c)
<b>B.5.</b> Irritation – eye	
TEST SUBSTANCE	Notified chemical
METHOD Species/Strain Number of Animals Observation Period Remarks - Method	Similar to OECD TG 405 Acute Eye Irritation/Corrosion Rabbit/New Zealand White 4 72 hours No significant protocol deviations

## RESULTS

Lesion	Mean Score*		Maximum Value	Maximum Duration of Any Effect	Maximum Value at End of Observation Period		
	1	2	3	4			
Conjunctiva: redness	0	0.3	0	0	2	< 48 hours	0
Conjunctiva: chemosis	0	0	0	0	2	-	0
Conjunctiva: discharge	0	0	0	0	2	-	0
Corneal opacity	0	0	0	0	-	-	0
Iridial inflammation	0	0	0	0	-	-	0

\* Calculated on the basis of the scores at 24, 48, and 72 hours for EACH animals.

Remarks - Results	Mild to moderate conjunctival redness, chemosis and discharge were observed after dosing and only mild redness were noted in 1 animal at the 24-hour observation.		
CONCLUSION	The notified chemical is slightly irritating to the eye.		
TEST FACILITY	TLL (1992d)		
B.6. Skin sensitisation – guinea pig, maximisation test			

TEST SUBSTANCE	Notified chemical			
METHOD Species/Strain PRELIMINARY STUDY	Similar to OECD TG 406 Skin Sensitisation – Magnusson and Kligman Guinea pig/Dunkin-Hartley Intradermal: 25% (the highest concentration that caused an acceptabl local response) Topical: 100% (maximum non-irritating concentration)			
MAIN STUDY				
Number of Animals	Test Group: 20	Control Group: 10		
Vehicle	Ethanol			
Positive control	Not conducted in parallel with the t previously in the test laboratory usir	est substance, but had been conducted g 1-chloro-2,4-dinitrobenzene.		
INDUCTION PHASE	Induction Concentration:	-		
	intradermal: 25%			
	topical: 100%			
Signs of Irritation	Not reported			
CHALLENGE PHASE challenge	topical: 50% and 100%			
Remarks - Method	1			
Kemarks - wiethod	No significant protocol deviations			

## RESULTS

Animal	Challenge Conc	entration	Number of Animals Showing S	
			24 h	48 h
Test Group	1		0/20	0/20
Control Group			0/10	0/10
Remarks - Results No sign animals.			of irritation were observed after	challenge in control and test
CONCLUSION			s no evidence of reactions indica nemical under the conditions of th	
TEST FACILITY		TLL (199	2e)	
B.7. Genotoxic	city – bacteria			
TEST SUBSTANCE		Notified c	hemical	
Method		OECD TO	3 471 Bacterial Reverse Mutation	Test
			rporation procedure	
Species/Strain			<i>ırium</i> : TA1535, TA1537, TA98, T	
	tivation System		n from phenobarbital/β-naphthofla	
Concentration	Range in		etabolic activation: $50 - 5000 \ \mu g/$	
Main Test			t metabolic activation: $50 - 5000$	μg/plate
Vehicle			sulphoxide	
Remarks - Me	ethod	was based	icant protocol deviations. The do l on the toxicity observed in a prel plate using TA100.	
			etabolic activation: 2-aminoant penzo(a)pyrene (TA98); 1,8-dihyd	

## RESULTS

Metabolic	Test Substance Concentration ( $\mu g$ /plate) Resulting in:					
Activation	Cytotoxicity in Preliminary Test	Cytotoxicity in Main Test	Precipitation	Genotoxic Effect		
Absent						
Test 1	> 5000	> 5000	$\geq$ 5000	negative		
Test 2		> 5000	$\geq$ 5000	negative		
Present						
Test 1	> 5000	≥5000	$\geq$ 5000	negative		
Test 2		$\geq$ 5000	$\geq$ 5000	negative		
Remarks - Results	observe	nificant increases in t d for any of the bac ce, either with or witho	terial strains, with a	any dose of the tes		
Remarks - Results	observe substan The pos		terial strains, with a ut metabolic activation	any dose of the tes 1.		
Remarks - Results	observe substand The pos the valie	d for any of the bac ce, either with or witho sitive and negative cont dity of the test system. ified chemical was not	eterial strains, with a ut metabolic activation rols gave a satisfactor	any dose of the tes 1. y response confirmin		

## B.8. Genotoxicity – bacteria

TEST SUBSTANCE	Notified chemical					
Method	OECD TG 471 Bacterial Reverse Mutation Test.					
	Plate incorporation procedure					
Species/Strain	S. typhimurium: TA1535, TA1537, TA98, TA100					
Metabolic Activation System	S9 fraction from phenobarbital/ $\beta$ -naphthoflavone induced rat liver					
Concentration Range in	a) With metabolic activation: $0.064 - 40 \ \mu g/plate$					
Main Test	b) Without metabolic activation: $0.32 - 200 \mu g/plate$					
Vehicle	Dimethylsulphoxide					
Remarks - Method	No significant protocol deviations. The dose selection for the main tests was based on the toxicity observed in a preliminary test carried out at $1.6 - 5000 \mu g/plate$ using TA98.					
	Positive controls:					
	With metabolic activation: 2-aminoanthracene Without metabolic activation: sodium azide (TA1535, TA100); 9- aminoacridine (TA1537); 2-nitrofluorene (TA98)					

#### RESULTS

Metabolic	Test Substance Concentration (µg/plate) Resulting in:						
Activation	Cytotoxicity in Preliminary Test	Cytotoxicity in Main Test	Precipitation	Genotoxic Effect			
Absent							
Test 1	$\geq$ 40	$\geq$ 40	> 40	negative			
Test 2		$\geq$ 40	> 40	negative			
Present							
Test 1	$\geq$ 200	$\geq$ 200	> 200	negative			
Test 2		$\geq$ 200	> 200	negative			

Remarks - Results

No significant increases in the frequency of revertant colonies were observed for any of the bacterial strains, with any dose of the test substance, either with or without metabolic activation.

The positive and negative controls gave a satisfactory response confirming the validity of the test system.

CONCLUSION

The notified chemical was not mutagenic to bacteria under the conditions of the test.

TEST FACILITY

TLL (1991b)

## APPENDIX C: ENVIRONMENTAL FATE AND ECOTOXICOLOGICAL INVESTIGATIONS

## C.1. Environmental Fate

## C.1.1. Ready biodegradability

TEST SUBSTANCE	Notified chemical
METHOD	ISO Guidelines No. 14593 Ready Biodegradability CO <sub>2</sub> in Sealed Vessels (similar to OECD TG 301 B)
Inoculum	Activated sludge from a domestic sewage treatment plant
Exposure Period	28 days
Auxiliary Solvent	None
Analytical Monitoring	Dissolved Organic Carbon and Inorganic Carbon by TOC
Remarks - Method	No major deviations from the test guidelines were reported. The test
	substance was directly added to the test medium in the test vessels. A
	toxicity control was run.

#### RESULTS

Test substance		Sodium benzoate		
Day	% Degradation	Day	% Degradation	
2	1	2	77	
10	-1	10	77	
20	-4	20	86	
28	0	28	91	

Remarks - Results	All validity criteria for the test were satisfied. The toxicity control exceeded 25% biodegradation after 14 days showing that toxicity was not a factor inhibiting the biodegradability of the test substance. The degree of degradation of the test substance after 28 days was 0%.		
CONCLUSION	The test substance is not readily biodegradable.		
TEST FACILITY	Safepharm (2005)		

#### C.1.2. Photodegradation

Laboratory photodegradation studies are conducted in pure water. However, natural water can contain clay, silt, and organic matter such as algae, soluble coloured organic compounds, and plankton. Additionally to be relevant to Australia, any extrapolation from the laboratory study must also account for the composition of Australian waters and the intensity and frequency of sunlight. The notifier has extrapolated the half-lives of between 2.7 and 7.8 hours from the photodegradation study in pure water (below) using comparisons of photodegradation rates of the notified chemical in reconstituted or natural water and modelling (Emberger & Lin, Lin 2017).

The photodegradation study included a test using reconstituted natural water (RNW). It was conducted using 9.15 mg/L of natural organic matter (NOM) using a conversion of 1.72 (Pribyl 2010) for organic carbon, and is relevant to Australian conditions which have NOM of between 2 and 10 mg/L (Bolto et al., 2007). In both pure water and RNW the notified chemical could not be detected after 4 hours, demonstrating that rates of degradation in both media are similar.

The notifier recalculated the quantum yield obtained in the photodegradation study, due to the baseline of the UV spectrum not being perfectly at zero and trace impurities in PNA, which should have been recrystallised twice for optimal results. The recalculated value was 0.51.

The recalculated quantum yield was verified by comparing the degradation of the notified chemical in pure water (in duplicate) at Princeton New Jersey ( $40.3^{\circ}N$ ;  $74.7^{\circ}W$ ) on 21/7/2017 and 27/10/2017 on clear days. An additional factor of 2 was included to account for the geometric differences between surface water and quartz (Mill et al., 1982). The calculated half-lives were 0.38 and 1.14 hours, respectively and compared with the measured values of 0.40 and 1.15 hours respectively.

The half-lives were calculated for water containing 2.5, 5, 7.5 and 10 mg/L DOC, at three latitudes 10 °S, 25 °S and 40°S at 1 and 5 m depths which is representative of a shallow and deep lake (Fee et al., 1996). The intensity of the sunlight was obtained from Bird and Hulstrom, (1981) model, obtained from (https://www2.pvlighthouse.com.au/calculators/solar%20 spectrum%20 calculator/solar%20 spectrum%20 spector.aspx). The effects of the DOC and depth of water on the attenuation of light was accounted for by correlating the DOC with the diffuse attenuation coefficient K<sub>d</sub>, according to Morris et al, (1995). The notifier did not include effects from turbidity on Kd. However, this was found to be acceptable for several reasons.

Firstly Australian waters under base flow conditions are not significantly more turbid than natural waters found in many industrialised countries (Henderson, Liu & Baldwin 2013, Cugley, Shukla & Sarneckis 2002, Mawhinney & Muschal, 2015, Bartley et al., 2012, Waters & Packet 2007, Yu, Zhang & Lemckert c 2015, Abril et al., 2002, Pawlowski et al., 2012 and Vilizzi 2012, USGS 2017-2018 and Voichick & Topping 2012). Therefore the correlation between Kd and organic carbon as proposed by Morris et al., (1995) would also be valid for Australian waters. Secondly turbidity is a bulk property of natural water's propensity to scatter and absorb light rather than transmit it in straight lines and is related to the of the amount of suspended and dissolved particles in solution (Dunlop, McGregor & Horrigan 2005). This lack of distinction between absorption and scattering means that the effects of turbidity on the rate degradation of a chemical are not well correlated. This is because only absorption of light results in a reduction in the energy available for photolysis, while scattering is elastic with no reduction in the energy of the photon (Zheng, Dickey & Chang 2002). Scattering may even extend the path length of the photon's travel through water which can increase the rate of degradation. Thirdly most measurements of turbidity are conducted in the visible of near infrared spectrum (USEPA 1993; Oregon Department of Environmental Quality 2014, Lake Superior streams 2018, Flint River Watershed Coalition 2011, Rasmussen et al., 2009), whilst most photodegradation occurs from the absorption of light in the near UV part of the spectrum (Banwell 1983 pp 234-237, Smith, Baker & Fahy 1983).

The degradation rates of the notified chemical were further modified by considering the number of sunny days in Australia. This was averaged from Bureau of Meteorology data from all capital cities in Australia and 14 major regional towns. A percentage of sunshine was determined by adding all sunny days and half of the partly sunny days for each location and dividing by the number of days in a year. The percentage was then averaged for all of Australia. The overall methodology is considered a reasonable estimate of the half-lives of the notified chemical relevant to Australian conditions and are presented below (Table 1).

Table 1: Est	timated pho	otodegradatio	n half-lives (d	ay) of the notifie	ed chemical in	Australian na	tural waters	
[DOC]	2.5	5	7.5	10	2.5	5	7.5	10
(mgC/L)								
10° S	1.3	3.0	4.9	6.9	6.3	15	24	35
25° S	1.4	3.2	5.3	7.6	6.9	16	27	38
40° S	1.7	3.9	6.4	9.1	8.2	19	32	45

A reasonable worst-case value of 45 days was calculated demonstrating the notified chemical is not likely to be persistent.

TEST SUBSTANCE	Notified Chemical
Method	OECD TG 316 Direct photolysis
	U.S. EPA OPPTS 835.2210 TG Direct photolysis
Light source and Spectrum	Atlas Suntest XLS+ solar simulator equipped with 1700 W xenon arc
	lamps, working at wavelengths from 290 to 800 nm.
Relative Intensity	765 W/m <sup>2</sup> at 25 °C
Spectrum of Test Substance	290 to 390 nm
Exposure Period	0.25, 0.5, 0.75, 1, 2, 4, 6, 8, 10 and 25 h
Remarks – Method	No major deviations from the test guidelines were reported. A preliminary test was conducted at 0.2, 1 and 10 mg/L of notified chemical. Based on the results of the preliminary test, solutions containing $\sim 2$ mg/L of the notified chemical were prepared according to the guidelines and photodegradation experiments were conducted in special quartz test tubes under simulated sunlight. Dark controls and test solutions in reconstituted natural water (RNW) were also run. The RNW contained 5.32 mg C/L. Additional test solutions containing $\sim 10$ mg/L were prepared for the investigation of degradation products. A

photodegradation screening test was performed to see whether it was a considerable process. Simultaneous photodegradation of the notified chemical and the actinometer 4-Nitroanisole [para-nitroanisole (PNA)] was conducted to determine the direct photodegradation quantum yield of the notified chemical. The degradation products were analysed by gas chromatography -mass spectrometry (GC-MS) and ultra-high performance liquid chromatography - high resolution mass spectrometry (UHPLC-HRMS) analyses.

The calculated half-lives in clear water under Australian geographical conditions are between 2.7 and 7.8 hours.

The rates of degradation of the notified chemical at various concentrations in the preliminary test were similar, demonstrating that the rate of degradation is independent of the concentration in the range of 0.1 - 10 mg/L. There was no degradation of the notified chemical or PNA in the dark controls. A  $\lambda$ max, (the wavelength at which the maximum light is absorbed) for the notified chemical could not be established, but absorbance increased, with decreasing wavelength for wavelengths between 390 and 290 nm. Photoisomerization of the notified chemical yielded the corresponding Z isomers and Norrish Type II cleavage of the notified chemical led to the formation of four isomers of 4-(2,2,3,6-tetramethylcyclohexylidene)butan-2-one. These volatile compounds, detected by GC-MS, only represented a portion of the total degradation products. Their concentrations in the test solutions initially increased and then began to decrease due to further degradation into non-volatile compounds. Non-volatile photodegradation products of the notified chemical were found to be numerous and more polar than the notified chemical by UHPLC-HRMS analysis. They were likely formed through photo-induced oxidation. These photooxidation products underwent further direct and indirect photodegradation. These processes are expected to continue to transform the entire set of degradation products into smaller and more polar compounds and eventually into carbon dioxide and water. Although there were some differences in the proportions of the degradation products in the RNW test, the degradation pathway is similar to that of the test in pure water.

The notified chemical could not be detected after 4 hours, and the half-life of the notified chemical was calculated as  $0.18 \pm 0.005$  hours in pure water. The half-life in RNW was not calculated but the notified chemical could also not be detected after 4 hours, demonstrating rapid degradation.

The quantum yield (the proportion of absorbed photons, which lead to a degradation reaction in comparison with the total of absorbed photons) for the notified chemical was calculated as 0.0969. From the quantum yield an estimate of the photodegradation rate of the notified chemical in sunlit surface water as a function of latitude and season was made using (Equation 1).

Equation 1

$$k_{dir} = \phi \sum_{\lambda} \epsilon_{\lambda} L_{\lambda}$$

The value for  $E_{\lambda}$  in W/m<sup>2</sup>, was generated using SMARTS model developed by the US Department of Energy, Office of Energy Efficiency and Renewable Energy (http://www.nrel.gov/rredc/smarts/).

The half-lives were calculated using the well-known equation

RESULTS

Remarks - Results

(Equation 2).

Equation 2

$$t_{1/2} = \frac{ln2}{k_{dir}}$$

The values at various latitudes and seasons are presented below.

*Table 2: Direct photodegradation half-lives (hours) of the notified chemical estimated as a function of season and latitude* 

	Summer				Winter			
Latitude	10°S	20°S	30°S	40°S	10°S	20°S	30°S	40°S
Half-life	2.8	2.7	2.7	2.8	3.4	4.1	5.3	7.8
(hr)								

CONCLUSION

Degradation of the notified chemical is rapid in clear water even during winter at  $40^{\circ}$ S with a half-life of 7.8 hours.

TEST FACILITY

Firmenich (2017)

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