



ECHA's update on Endocrine Disruptors with focus on environment

7 March 2024

FY2023 Public Seminar on Endocrine
Disrupting Effects under EXTEND2022

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European Chemicals Agency



環境に焦点を当てた 内分泌かく乱物質に関する ECHAの最新情報

2024年3月7日

2023年度 内分泌かく乱作用に関する公開セミナー

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Content

- Integrated Regulatory strategy for EDs
- ECHA experience on ED identification
- CLP criteria for Endocrine Disruption – regulatory framework
- ECHA’s work on the CLP Guidance – focus on environment
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 - ❖ Population relevance
 - ❖ Classification in the presence of other toxicity
 - ❖ Decision on classification
 - ❖ Thyroid specific considerations

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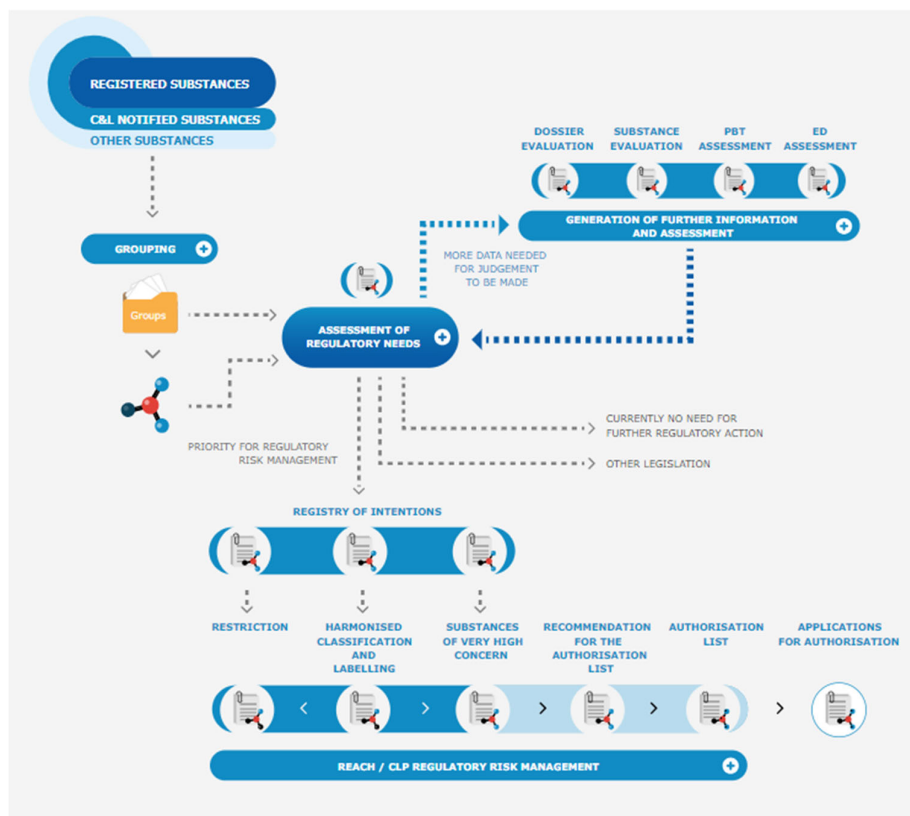
- 内分泌かく乱物質(EDs)を対象とした統合的な規制戦略
- ECHAのEDの同定に関する経験
- 内分泌かく乱作用に関するCLPクライテリア – 規制の枠組み
- CLPガイダンスに関するECHAの作業 – 環境に焦点をあてる
 - ❖ 情報の出所と評価
 - ❖ 個体群との関連性
 - ❖ 他の毒性の存在下での分類
 - ❖ 分類の決定
 - ❖ 甲状腺特有の考慮事項

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Integrated Regulatory Strategy

- Regulatory processes **interconnected**
- **Work on groups** is central to finding substances needing actions
- Iterative process
- Transparent
 - Annual report
 - Chemical universe
 - Publication of Assessment Regulatory Needs (ARNs)

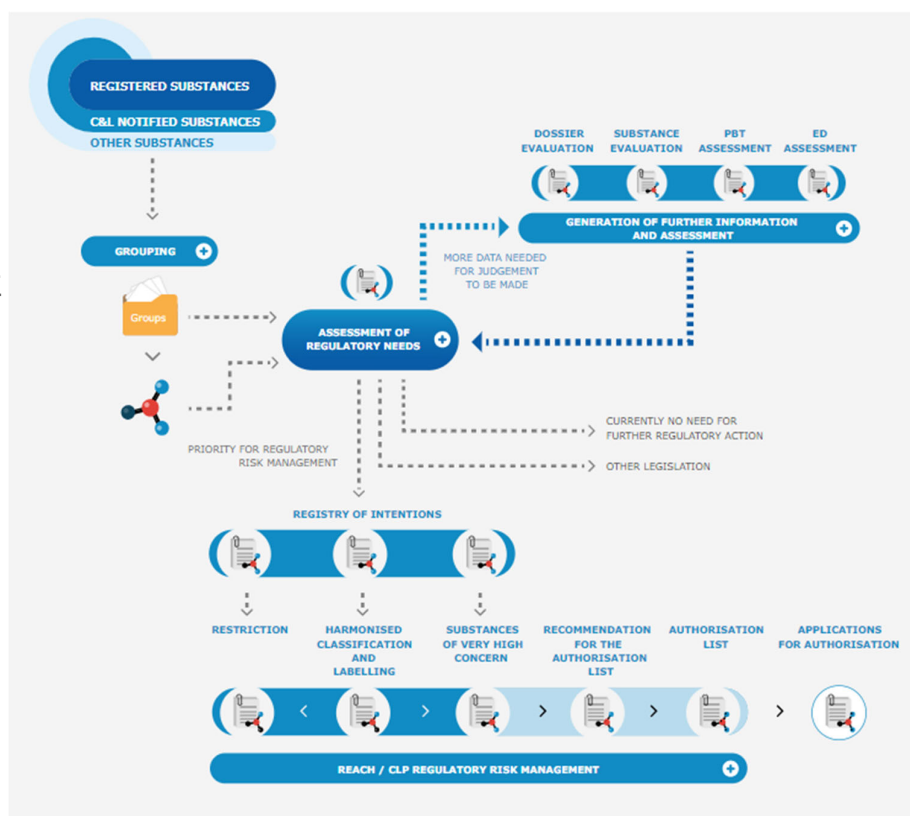
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統合的な規制戦略

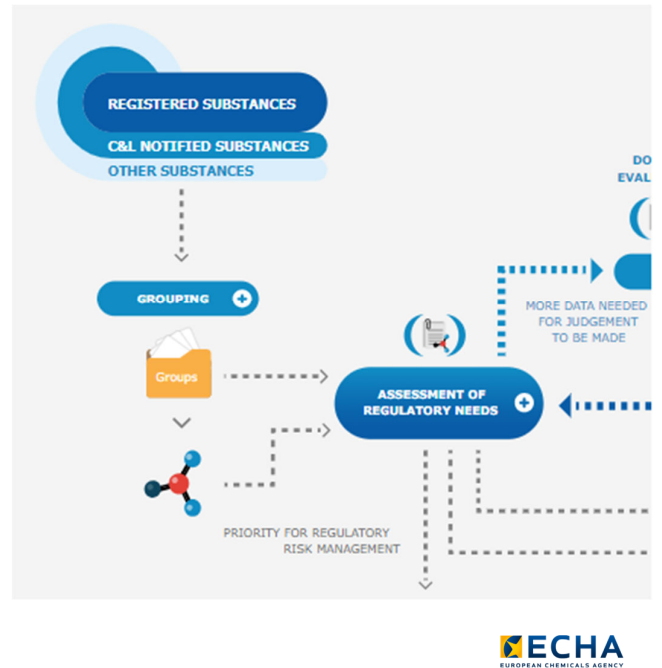
- 規制プロセスを相互に関連させる
- グループ作業は、対応が必要な物質を特定していく上での根幹となる
- 双方向的なプロセス
- 透明性
 - 年次報告書
 - 化学物質の大母集団
 - 規制ニーズの評価 (ARNs) の公表

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Registration and screening

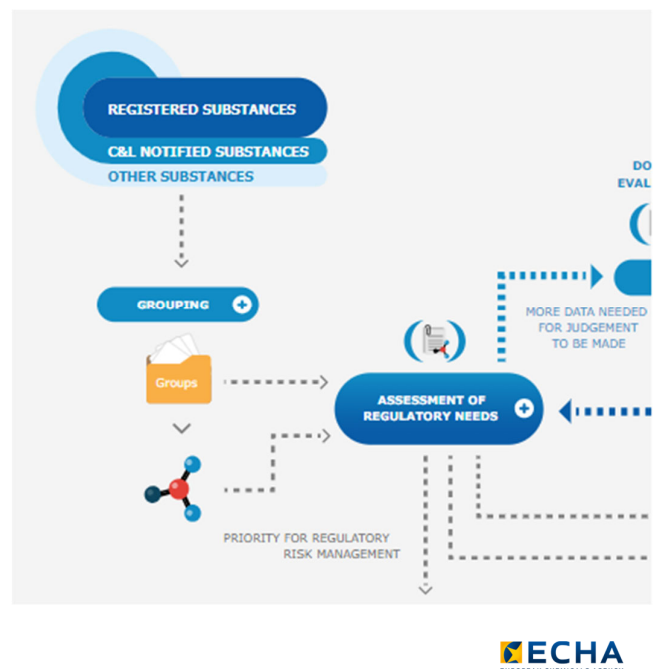
- Currently **no specific ED information requirements under REACH**
- BUT: The registration data together with other available information allows identification of potential EDs
- ECHA generates **groups of substances** and identifies candidates for further work by MSCAs and ECHA itself;
- ECHA publishes for each group of substance the **Assessment of Regulatory Needs (ARN) report**
- Examples of groups of substances with ED properties: Bisphenols, phthalates, parabens



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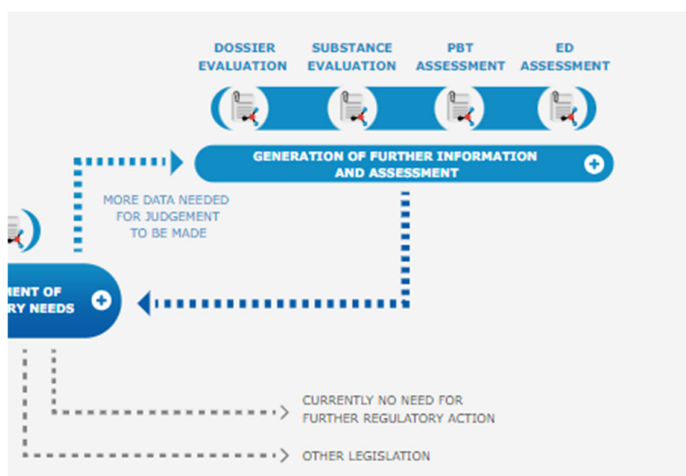
登録とスクリーニング

- 現在のところ、REACHに基づく特定のED情報の要求はない
- だが、登録データと他の利用可能な情報により、潜在的なEDsを同定できる
- ECHAは物質群を作成し、MSCAsとECHA自体による更に作業すべき候補を特定する
- ECHAは、物質群ごとに規制ニーズ評価（ARN）報告書を公表している
- ED特性を有する物質群の例：ビスフェノール類、フタル酸エステル類、パラベン類



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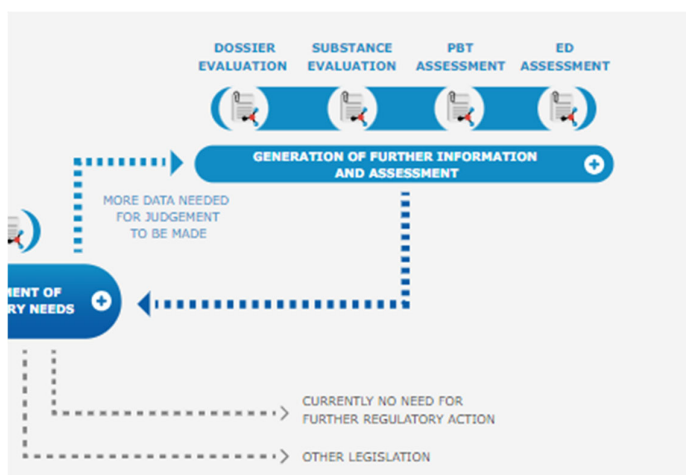
Generation of further information and assessment



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- The work with groups helps to identify **which data needs to be generated** or further assessed for a particular substance to clarify whether the substance has hazardous properties.
- The main **tools for generating missing hazard information** are:
 - compliance checks and
 - substance evaluation.
- The data is then assessed to determine whether it confirms the hazard.
- A dedicated **expert group** has been established to support Member States in the ED assessment (ED EG).
- Member States consult the ED EG before a substance enters the formal substance evaluation or SVHC identification decision-making process.

詳細情報の作成と評価



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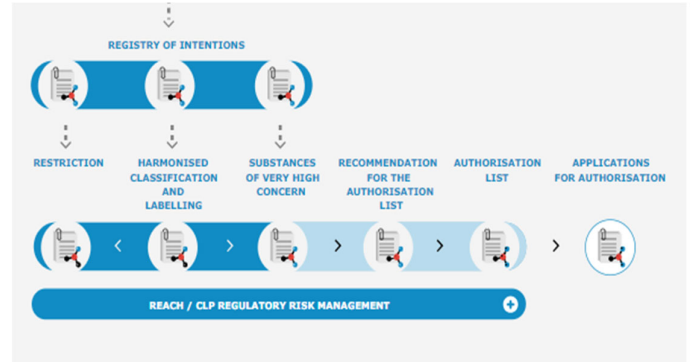
- グループでの作業は、物質が危険な特性を持っているかどうかを明確にするために、特定の物質について、**どんなデータを取得、またはさらに評価する必要があるかを特定する**のに役立つ。
- 不足している有害性情報を取得するための主なツールは以下の通り:
 - コンプライアンス・チェック及び
 - 物質評価
- 次に、データが評価され、有害性が確認されているかどうか判断される。
- ED評価(ED EG)において加盟国を支援するために、**専門家グループ**が設立された。
- 加盟国は、物質が正式な物質評価又はSVHCとして特定する判断過程に入る前にED EGに相談する。

Regulatory Risk management

Hazards can be confirmed either through:

- **Harmonised classification and labelling (CLH)**
- **Identification as a Substance of Very High Concern (SVHC):** a substance that gives rise to an equivalent level of concern as PBT/vPvB or CMR. The substance is then placed on the Candidate List.

Those have consequences for the company level risk management and they trigger or enable authorities to take further regulatory risk management.



Under REACH, two main further regulatory risk management tools are available:

- **Authorisation, which involves two steps after substance has been included in the Candidate List:**
 - **Recommendations for the Authorisation List:** ECHA prioritises and recommends substances from the Candidate List for inclusion in the Authorisation List. The Commission takes the final decision on inclusion.
 - **Applications for authorisation:** If a substance is on the Authorisation List, it cannot be placed on the market or used after the sunset date unless an authorisation has been granted for a particular use. Companies need to submit their applications for authorisation to ECHA.
- **Restriction:** A restriction limits or bans the manufacture, placing on the market or use of a substance that poses an unacceptable risk to human health or to the environment.

Stakeholders are informed about a substance entering regulatory risk management in the registry of intentions until outcome and the public activities coordination tool (PACT).

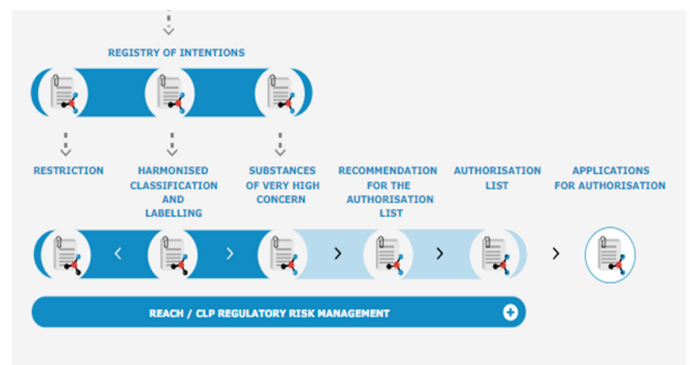
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規制リスク管理

有害性は、以下のいずれかの方法で確認できる:

- **分類と表示の調和 (CLH)**
- **高懸念物質 (SVHC) としての同定:** PBT/vPvB 又は CMR と同等の懸念がある物質。その後、候補リストに掲載される。

これらは企業レベルのリスク管理に影響を及ぼし、当局がさらなる規制リスク管理を行うきっかけとなる。



REACH 下では、更に2つの主要な規制リスク管理ツールが利用できる:

- **認可**は、物質が候補リストに含まれた後、**2つの段階を踏む**:
 - **認可リストへの推奨:** ECHA は、候補リストから認可リストに含める物質の優先順位を決定し推薦する。欧州委員会が認可リストへの掲載を最終決定する。
 - **認可申請:** 物質が認可リストに掲載されている場合、特定の用途について認可が下りない限り、日没日以後に当該物質を上市したり使用することはできない。企業は ECHA に認可申請書を提出する必要がある。
- **制限:** ヒト健康や環境に許容できないリスクをもたらす物質の製造、上市、使用を制限又は禁止する。

ステークホルダーは、規制リスク管理に入る物質について、結果が出るまでの意向登録簿と公的活動調整ツール (PACT) で知らされる。

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Candidate List

LEGISLATION CONSULTATIONS SEARCH FOR CHEMICALS SUPPORT

ECHA > Search for chemicals > Candidate List

Candidate List of substances of very high concern for Authorisation

(published in accordance with Article 59(10) of the REACH Regulation)

Notes:

- Authentic version:** Only the Candidate List published on this website is deemed authentic. Companies may have immediate legal obligations following the inclusion of a substance in the Candidate List on this website including in particular Articles 7, 31 and 33 of the REACH Regulation.
- Numerical identifiers:** Each candidate list entry covers both anhydrous and hydrated forms of a substance. The CAS number shown in an entry is typically for the anhydrous form. Hydrated forms of the substance identified by other CAS numbers are still within the scope of the entry.
- Other numerical identifiers:** For those entries with "-" in the EC number and CAS number columns, a non-exhaustive inventory of EC and/or CAS Registry numbers describing substances or groups of substances considered to fall within the scope of the Candidate List entry is included, where practicably possible. This information can be accessed through the "Details" button of the selected entry.

> Filter the list

FURTHER INFORMATION

- More information about Candidate list of Substances of Very High Concern for Authorisation
- Data on Candidate List substances in articles
- Reason for inclusion

See a problem or have feedback?

Page 1 of 1 50 Items per Page Showing 16 results. -- First Previous Next Last --

Substance name	EC No.	CAS No.	Date of inclusion	Reason for inclusion	Decision	IUCLID dataset
4,4'-sulphonyldiphenol	201-250-5	80-09-1	17-Jan-2023	<ul style="list-style-type: none">Toxic for reproduction (Article 57c)Endocrine disrupting properties (Article 57(f) - environment)Endocrine disrupting properties (Article 57(f) - human health)	D(2022)9120-DC	
Phenol, alkylation products (mainly in para position) with C12-rich branched alkyl chains from oligomerisation, covering any individual	-	-	08-Jul-2021	<ul style="list-style-type: none">Toxic for reproduction (Article 57c)Endocrine disrupting properties (Article 57(f) - environment)	D(2021)4569-DC	



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候補リスト

LEGISLATION CONSULTATIONS SEARCH FOR CHEMICALS SUPPORT

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Regulatory risk management under REACH

- **Aim:** promote the substitution and ensure a high level of protection until the transition to safer alternatives takes place
- **28** substances in the candidate list due to ED properties (mainly phthalates and bisphenols)
 - 6 ED HH, 16 ED ENV, 6 ED HH+ENV
- Substances with ED properties are already subject to **authorisation requirements (7 in Annex XIV) & restriction (3 in Annex XVII)**, others are on-going
- Several EU legislations make reference and require actions based on the identification of ED properties under REACH

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REACH規則におけるリスク管理

- **目的:** より安全な代替品への移行が行われるまでの間、代替を促進し、高いレベルの防護を確保する
- ED特性による候補リスト**28**物質（主にフタル酸エステル類とビスフェノール類）
 - 6 ED HH, 16 ED ENV, 6 ED HH+ENV
- ED特性を有する物質は、既に認可要件（附属書XIVの7物質）及び制限（附属書XVIIの3物質）の対象であり、その他は継続中である。
- EUのいくつかの法律は、REACH下でED特性の同定に基づく措置に言及し、要求している

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ECHA's experience so far in the assessment and identification of EDs under REACH

- **Under REACH there are no specific Information requirements for endocrine disruption**
 - Limited capacity to request data under the Compliance check process
 - (For ENV) data requested mainly under Substance Evaluation (SEV)
 - ECHA collaborating with European Commission to revise the standard information requirement under REACH
- Identification of SVHC is based on the Equivalent level of concern (ELOC) REACH Art 57(f)
- **Under REACH there are no specific criteria for ED nor a definition**
- Assessment is based on a case-by-case basis on the WHO/IPCS (2002) definition:

"exogenous substances that alter function(s) of the endocrine system and consequently cause adverse health effects in an intact organism or its progeny, or (sub)populations"
- Need to identify three elements:
 - Adversity (For ENV adversity relevant at the level of population)
 - Endocrine activity
 - Biologically plausible link between adversity and endocrine activity
- Complex assessment based on Weight of Evidence (**WoE**)
 - Expert judgement needed

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評価におけるECHAのこれまでの経験及び REACHにおけるEDsの同定

- **REACHでは内分泌かく乱作用に関する具体的な情報要求はしない**
 - コンプライアンスのチェック過程に基づくデータ要求には制限がある
 - (ENVの場合) 主に物質評価 (SEV) にて要求されるデータ
 - ECHAはREACHの標準情報要求の改正に向けて欧州委員会と協力
- SVHCの同定は同等懸念レベル(ELOC)に基づく REACH第57条(f)
- **REACHではEDの具体的なクライテリアも定義もない**
- 評価はWHO/IPCS (2002) の定義に基づき、ケースバイケースで行われる：

「内分泌系の機能を変化させ、その結果、健全な生物、その子孫、又は（亜）個体群に有害健康影響を及ぼす外因性の物質」
- 3つの要素を同定する必要がある：
 - 有害性（個体群レベルに関連するENV有害性の場合）
 - 内分泌活性
 - 有害性と内分泌活性とに生物学的に妥当な関連性
- 科学的根拠の重み付け (**WoE**) に基づく複雑な評価
 - 専門家の判断が必要

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ECHA's ED Expert group (ED EG)

- ED assessment is not easy
- **The ED expert group gives support to Member States contributing to the efficiency of the evaluation process (for REACH, biocides and soon CLH)**
- **It gives informal scientific and non-binding advice**
 - Identification of data generation needs
 - Interpretation of data received from Industry
 - Contribution to development of approaches for testing strategies and assessments
- It does not take any formal decision; this remains a responsibility solely of the competent authority
- Meetings are coordinated, held and chaired by ECHA (3 meetings per year)

Authorities: Member States and EEA	AT, BE, CZ, DE, DK, EL, ES, FI, FR, IE, IT, LT, NL, NO, PL, RO, SE, SK, SI
Industry stakeholders	CEFIC, ECETOC, CONCAWE
Public interest stakeholders	EEB, HEAL, CHEM Trust, HSI, PETA, ETUC
European Commission	DG GROW, DG ENV, DG JRC, DG SANTE
Others	EFSA, CH, OECD

10 <https://echa.europa.eu/endocrine-disruptor-expert-group>

ECHAのED専門家グループ (ED EG)

- EDの評価は容易ではない
- **ED専門家グループは、評価過程の効率化に貢献することで加盟国を支援する (REACH、殺生物剤、近くCLHも対象)**
- **科学的で拘束力のない非公式な助言を提供する**
 - データ作成ニーズの特定
 - 産業界から受け取ったデータの解釈
 - 試験実施戦略及び評価へのアプローチの開発への貢献
- 正式な決定は行わない。所轄官庁に一元的責任
- 会議はECHAが調整、開催、議長を務める (年3回開催)

当局: 加盟国及びEEA	AT, BE, CZ, DE, DK, EL, ES, FI, FR, IE, IT, LT, NL, NO, PL, RO, SE, SK, SI
産業界 ステイクホルダー	CEFIC, ECETOC, CONCAWE
公益的 ステイクホルダー	EEB, HEAL, CHEM Trust, HSI, PETA, ETUC
欧州委員会	DG GROW, DG ENV, DG JRC, DG SANTE
その他	EFSA, CH, OECD

10 <https://echa.europa.eu/endocrine-disruptor-expert-group>

ECHA's ED Expert group (ED EG) – work done so far

- 27 meetings
- 122 substances discussed (some substances more than once)
- Mostly REACH substances
 - 36 under assessment
 - 15 postponed
 - 6 concluded not ED
 - 6 inconclusive conclusion
 - 26 concluded ED
- Lower numbers for biocides
 - 29 under assessment
 - 3 concluded ED
 - 1 postponed

ECHAのED専門家グループ（ED EG） - これまでの活動

- **27回の会合**
- **122物質について議論（複数回議論した物質もある）**
- **ほとんどがREACH対象物質**
 - 36 物質 評価中
 - 15 物質 評価先送り
 - 6 物質 EDでないと結論
 - 6 物質 はっきりと結論できない
 - 26 物質 EDであると結論
- **殺生物剤については対象物質数が少ない**
 - 29 物質 評価中
 - 3 物質 EDであると結論
 - 1 物質 評価先送り

NEW CLP criteria
for Endocrine Disruption

内分泌かく乱作用の
新しいCLP基準



Legislation

REACH

The **REACH Regulation** aims to improve the protection of human health and the environment from the risks that can be posed by chemicals.

- [Read more](#)

CLP

The **CLP Regulation** ensures that the hazards presented by chemicals are clearly communicated to workers and consumers in the EU through classification and labelling of chemicals.

- [Read more](#)

BPR

The **BPR** aims to improve the functioning of the biocidal products market in the EU, while ensuring a high level of protection for humans and the environment.

- [Read more](#)

PIC

The **PIC Regulation** administers the import and export of certain hazardous chemicals and places obligations on companies who wish to export these chemicals to non-EU countries.

- [Read more](#)

CAD/CMRD (OELs)

The **Chemical Agents Directive (CAD)** and the **Carcinogens, Mutagens or Reprotoxic substances Directive (CMRD)** provide a framework for setting occupational exposure limits, forming an integral part of the EU's mechanism for protecting the health of workers.

- [Read more](#)

WFD

The **Waste Framework Directive** sets out measures addressing the adverse impacts of the generation and management of waste on the environment and human health, and for improving efficient use of resources which are crucial for the transition to a circular economy.

- [Read more](#)

POPs

The **POPs Regulation** bans or severely restricts the production and use of persistent organic pollutants in the European Union.

- [Read more](#)

DWD

The revised **Drinking Water Directive** aims to protect citizens and the environment from the harmful effects of contaminated drinking water and to improve access to drinking water.

- [Read more](#)

Batteries

The **Batteries Regulation** aims to make batteries sustainable throughout their life cycle, and to protect citizens and the environment from risks of harmful chemicals in batteries. It also acknowledges the important role of batteries in transitioning to clean energy.

- [Read more](#)



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The Regulatory framework

- Harmonised classification is the **first step** and **cornerstone** for many risk management actions
 - Biocides a.s. (re)assessment and authorisation
 - PPP a.s. (re)assessment and authorisation
 - Authorisation and restriction under REACH
 - Generic restriction (GRA)
 - A variety of other pieces of downstream legislations
- => Classification already has a wide and significant impact
- Even more central with the classification criteria for the new hazard classes (supporting **one substance, one assessment**)
- CLP 2.0 is part of the revisions under CSS (**Chemicals strategy for sustainability**)

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規制的枠組み

- 調和化分類は、多くのリスク管理活動の**第一歩**であり**基礎**となる
 - 殺生物剤活性物質の（再）評価及び認可
 - PPP活性物質（再）評価及び認可
 - REACH規則における認可及び規制
 - ジェネリック規制（GRA）
 - その他、川下での法規制下での種々の管理
- ⇒分類は既に広く重要な影響を及ぼしている
- 新たな有害性クラス分類クライテリアでは、さらに中心的な役割を果たす（**1物質1評価**を支持）
- CLP 2.0は、CSS（持続可能性に向けた化学物質戦略）の改正の一部

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Chemical Strategy for sustainability

ENDOCRINE DISRUPTORS

The Commission will:

- propose to establish **legally binding hazard identification** of endocrine disruptors, based on the definition of the WHO, building on criteria already developed for pesticides and biocides, and apply it across all legislation;
- ensure that **endocrine disruptors are banned in consumer products** as soon as they are identified, allowing their use only where it is proven to be essential for society;
- strengthen **workers' protection** by introducing endocrine disruptors as a category of substances of very high concern under REACH;
- ensure that sufficient and appropriate **information is made available to authorities** to allow the identification of endocrine disruptors by reviewing and strengthening information requirements across legislation;
- accelerate the development and uptake of **methods to generate information** on endocrine disruptors through screening and testing of substances.

持続可能性に向けた化学物質戦略

ENDOCRINE DISRUPTORS

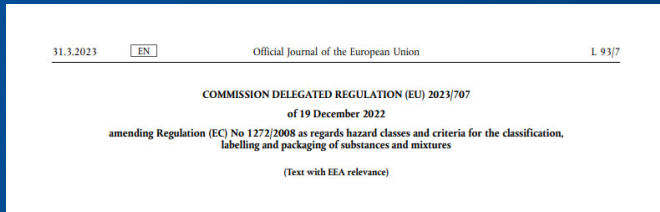
The Commission will:

- propose to establish **legally binding hazard identification** of endocrine disruptors, based on the definition of the WHO, building on criteria already developed for pesticides and biocides, and apply it across all legislation;
- ensure that **endocrine disruptors are banned in consumer products** as soon as they are identified, allowing their use only where it is proven to be essential for society;
- strengthen **workers' protection** by introducing endocrine disruptors as a category of substances of very high concern under REACH;
- ensure that sufficient and appropriate **information is made available to authorities** to allow the identification of endocrine disruptors by reviewing and strengthening information requirements across legislation;
- accelerate the development and uptake of **methods to generate information** on endocrine disruptors through screening and testing of substances.

New Hazard Classes and Criteria to CLP

COM Regulation 2023/707 adds the following properties/hazard classes:

- Endocrine disruption
 - ED HH Cat 1 and Cat 2
 - ED ENV Cat 1 and Cat 2
- Persistent, Bioaccumulative, Toxic
 - PBT/vPvB (one hazard class, no sub-categories)
- Persistent, Mobile, Toxic
 - PMT/vPvM (one hazard class, no sub-categories)

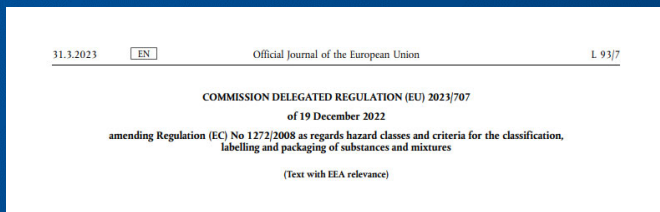


<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0707>

CLPへの新たな有害性クラスとクライテリア

COM規則2023/707は、以下の特性/有害性クラスを追加した：

- 内分泌かく乱作用
 - ED HH Cat 1及びCat 2
 - ED ENV Cat 1及びCat 2
- 難分解性、生体蓄積性、毒性
 - PBT/vPvB（有害性クラスは1のみ、サブカテゴリーなし）
- 難分解性、移動性、毒性
 - PMT/vPvM（有害性クラスは1のみ、サブカテゴリーなし）



<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0707>

Criteria for ED ENV

- Substance is classified when
- i) *endocrine activity* and
 - ii) *adverse effect* and
 - iii) *biologically plausible link between* adversity and endocrine activity is established
- Cat 1 – Known or presumed endocrine disruptors
 - Cat 2 – Suspected endocrine disruptors

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Hazard categories for endocrine disruptors for the environment	
Categories	Criteria
CATEGORY 1	<p><i>Known or presumed endocrine disruptors for the environment</i></p> <p>The classification in Category 1 shall be largely based on evidence from at least one of the following:</p> <p>a) animal data; b) non-animal data providing an equivalent predictive capacity as data in point a.</p> <p>Such data shall provide evidence that the substance meets all the following criteria:</p> <p>(a) endocrine activity; (b) an adverse effect in an intact organism or its offspring or future generations; (c) a biologically plausible link between the endocrine activity and the adverse effect.</p> <p>However, where there is information that raises serious doubt about the relevance of the adverse effects identified at population or subpopulation level, classification in Category 2 may be more appropriate.</p>
CATEGORY 2	<p><i>Suspected endocrine disruptors for the environment</i></p> <p>A substance shall be classified in Category 2 where all the following criteria are met:</p> <p>(a) there is evidence of:</p> <p>i. an endocrine activity; and ii. an adverse effect in an intact organism or its offspring or future generations;</p> <p>(b) the evidence referred to in point (a) is not sufficiently convincing to classify the substance in Category 1;</p> <p>(c) there is evidence of a biologically plausible link between the endocrine activity and the adverse effect.</p>

ED ENVのクライテリア

- 物質は以下の場合に分類される
- i) *内分泌活性*及び
 - ii) *有害影響*及び
 - iii) 有害性と内分泌活性に *生物学的に妥当な関連性*が確立されている
- Cat 1 - 内分泌かく乱物質として既知又は推定される物質
 - Cat 2 - 推定内分泌かく乱物質として疑われる物質

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Hazard categories for endocrine disruptors for the environment	
Categories	Criteria
CATEGORY 1	<p><i>Known or presumed endocrine disruptors for the environment</i></p> <p>The classification in Category 1 shall be largely based on evidence from at least one of the following:</p> <p>a) animal data; b) non-animal data providing an equivalent predictive capacity as data in point a.</p> <p>Such data shall provide evidence that the substance meets all the following criteria:</p> <p>(a) endocrine activity; (b) an adverse effect in an intact organism or its offspring or future generations; (c) a biologically plausible link between the endocrine activity and the adverse effect.</p> <p>However, where there is information that raises serious doubt about the relevance of the adverse effects identified at population or subpopulation level, classification in Category 2 may be more appropriate.</p>
CATEGORY 2	<p><i>Suspected endocrine disruptors for the environment</i></p> <p>A substance shall be classified in Category 2 where all the following criteria are met:</p> <p>(a) there is evidence of:</p> <p>i. an endocrine activity; and ii. an adverse effect in an intact organism or its offspring or future generations;</p> <p>(b) the evidence referred to in point (a) is not sufficiently convincing to classify the substance in Category 1;</p> <p>(c) there is evidence of a biologically plausible link between the endocrine activity and the adverse effect.</p>

New elements of the CLP revisions

- For each new hazard class for ED
- Definitions
- Classification criteria for substances
- Concentration limits for mixtures (generic or specific)
- Hazard communication:
 - New hazard statements (EUH)
 - No symbol/pictogram yet for the new hazard classes (to be discussed at UN-GHS)

Hazard statements

Classification	Category 1	Category 2
Symbol/pictogram		
Signal Word	Danger	Warning
Hazard Statement	EUH430: May cause endocrine disruption in the environment	EUH431: Suspected of causing endocrine disruption in the environment
Precautionary Statement Prevention	P201 P202 P273	P201 P202 P273
Precautionary Statement Response	P391	P391
Precautionary Statement Storage	P405	P405
Precautionary Statement Disposal	P501	P501

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Concentration limits for mixtures

Component classified as:	Generic concentration limits triggering classification of a mixture as:	
	Category 1 endocrine disruptor for the environment	Category 2 endocrine disruptor for the environment
Category 1 endocrine disruptor for the environment	≥ 0,1 %	
Category 2 endocrine disruptor for the environment		≥ 1 % [Note 1]

Note: The concentration limits in this Table apply to solids and liquids (w/w units) as well as gases (v/v units).

Note 1: If a Category 2 endocrine disruptor for the environment is present in the mixture as an ingredient at a concentration ≥ 0,1 % a SDS shall be available for the mixture upon request.

*Delegated Regulation 2023/707 (amends Annex I to CLP)
Entered into force: 20 April 2023*



CLP改正の新要素

- EDの新たな有害性クラスごとに
- 定義
- 物質の分類クライテリア
- 混合物の濃度限界値（一般的又は特定の）
- 有害性コミュニケーション
 - 新たな有害性ステートメント（EUH）
 - 新たな有害性クラスのシンボル/ピクトグラムは未設定（UN-GHSで議論予定）

ハザード・ステートメント

Classification	Category 1	Category 2
Symbol/pictogram		
Signal Word	Danger	Warning
Hazard Statement	EUH430: May cause endocrine disruption in the environment	EUH431: Suspected of causing endocrine disruption in the environment
Precautionary Statement Prevention	P201 P202 P273	P201 P202 P273
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混合物の濃度限界値

Component classified as:	Generic concentration limits triggering classification of a mixture as:	
	Category 1 endocrine disruptor for the environment	Category 2 endocrine disruptor for the environment
Category 1 endocrine disruptor for the environment	≥ 0,1 %	
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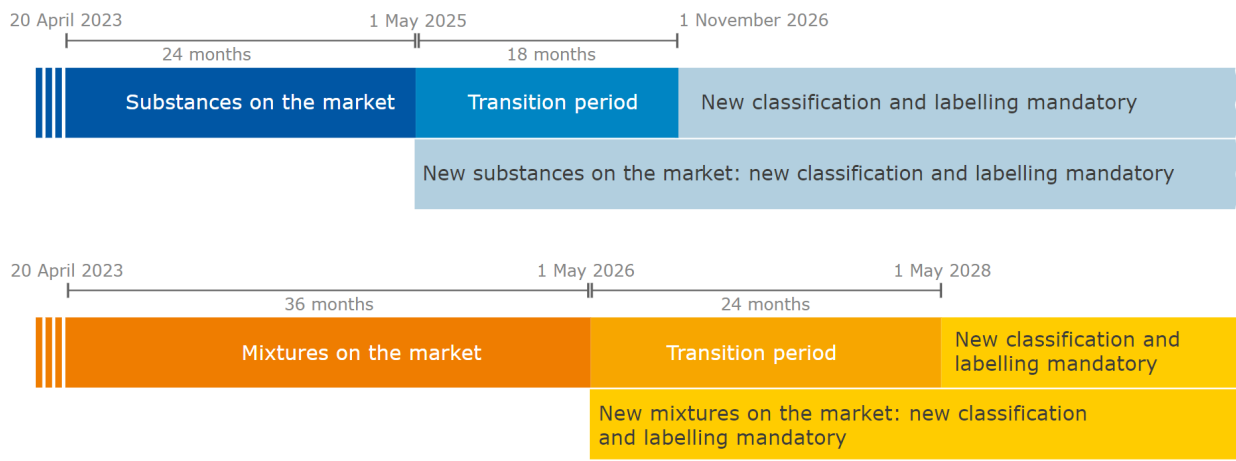
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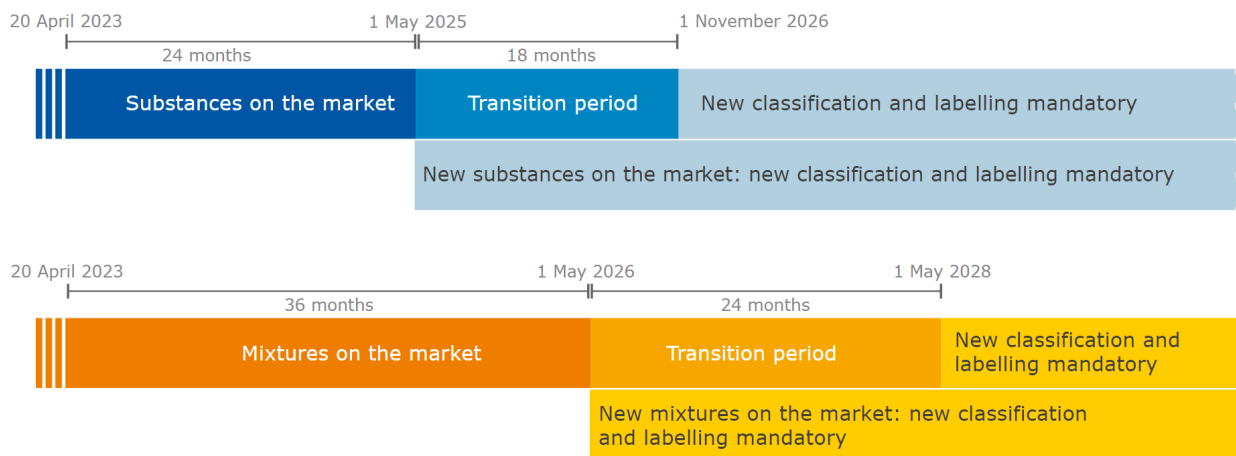
*委任規則 2023/707 (改正CLP附属書 I)
発効: 2023年4月20日*



Application dates of 2023/707 (new hazard classes)



2023/707（新たな有害性クラス）の適用日



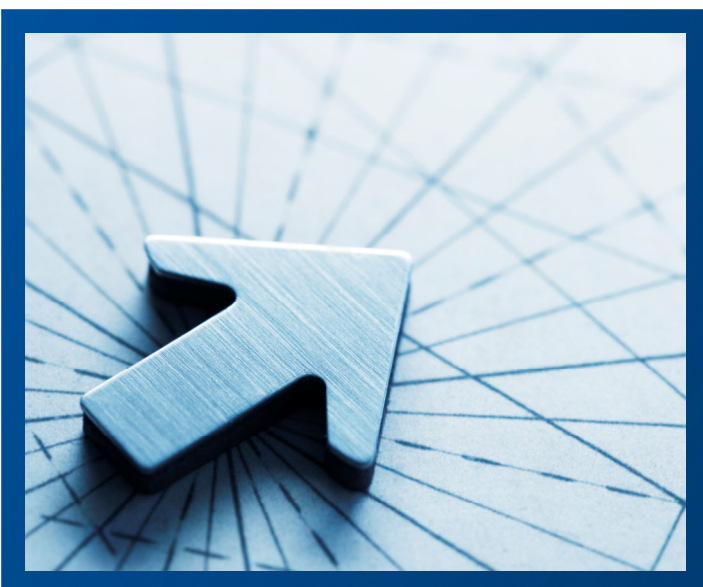
Implications



- Member States can already make CLH proposals for new hazard classes
- CLH-report template has been revised
- Industry can already self-classify on voluntary basis

After the expiry of the transition period, it will be mandatory to indicate if the substance is classified in any of the new hazard classes.

関連事項



- 加盟国は既に、新たな有害性クラスに関するCLH提案を実施可能
- CLH報告用テンプレートは改正済み
- 産業界は自主的なやり方で既に分類可能

移行期間終了後は、物質がどの新たな有害性クラスに分類されているかの表示義務が発生

IT-development necessary

Industry can update their registrations and notifications only when IUCLID has functionality to indicate the new Hazard Classes →

Planned IUCLID release April 2024.



After the expiry of the transition period, it will be mandatory to indicate if the substance is classified in any of the new hazard classes.

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IT開発が必要

産業界は、IUCLIDに新たな有害性クラスを示す機能がある場合にのみ、登録や通知を更新することが可能 →

2024年4月にIUCLID公表予定



移行期間終了後は、物質がどの新たな有害性クラスに分類されているかの表示義務が発生

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Updates already available

- CLH template updated to include new hazard classes
- [Formats and templates - ECHA \(europa.eu\)](https://eucha.europa.eu)
- Interim info package on ECHA website available
- [New hazard classes 2023 - ECHA \(europa.eu\)](https://eucha.europa.eu)

- <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0707&from=EN>

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ECHA > Legislation > CLP > New hazard classes 2023

CLP

- Understanding CLP
- Classification of substances and mixtures
- Labelling and packaging
- Harmonised classification and labelling (CLH)
- New hazard classes 2023**
- Alternative chemical name in mixtures
- Understanding Seveso
- C&L Inventory
- Legislation
- The role of testing in CLP
- Enforcement
- Substitution to safer chemicals
- Nanomaterials
- Addressing substances of concern

New hazard classes 2023

The European Commission has published a Delegated Regulation amending CLP Regulation, which sets out new hazard classes and criteria for the classification, labelling and packaging of substances and mixtures.

It applies to all chemical substances and mixtures placed on the EU market under REACH. It also applies to active substances in biocidal products and plant protection products, which are normally prioritised for harmonised classification in the EU.

This EU legislation is binding to manufacturers, importers, downstream users and distributors placing substances on the European Union market. Member States will also refer to the new hazard classes and criteria when making proposals for harmonised classification and labelling.

The new hazard classes are:

- ED HH in Category 1 and Category 2 (Endocrine disruption for human health)
- ED ENV in Category 1 and Category 2 (Endocrine disruption for the environment)
- PBT (persistent, bioaccumulative, toxic), vPvB (very persistent, very bioaccumulative)
- PMT (persistent, mobile, toxic), vPvM (very persistent, very mobile)

New EU hazard statements:

Hazard class and category code	Hazard statement code	Hazard statement
ED HH 1	EUH380	May cause endocrine disruption in humans
ED HH 2	EUH381	Suspected of causing endocrine disruption in humans
ED ENV 1	EUH430	May cause endocrine disruption in the environment
ED ENV 2	EUH431	Suspected of causing endocrine disruption in the environment

SEE ALSO

- Delegated Regulation 2023/707 amending CLP Regulation (EC) No 1272/2008
- Understanding CLP

Q&AS

- What new elements does the Commission Delegated Regulation (EU) 2023/707 of 19 December 2022 add to the CLP Regulation?
- What are the obligations for companies following the entry into force of the Commission Delegated Regulation (EU) 2023/707 of 19 December 2022?

既に利用可能なアップデート

- CLH テンプレートに新たな有害性クラスが追加更新
- [書式とテンプレート - ECHA \(europa.eu\)](https://eucha.europa.eu)
- ECHAウェブサイトから中間情報パッケージを提供
- [2023年の新たな有害性クラス - ECHA \(europa.eu\)](https://eucha.europa.eu)

- <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0707&from=EN>

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ECHA > Legislation > CLP > New hazard classes 2023

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ED CLP Guidance

ED CLPガイダンス

Guidance update

- 'Guidance on the Application of the CLP Criteria'
 - Part 3
 - 3.11 ED for HH
 - Part 4
 - 4.2 ED for ENV
 - 4.3 PBT/vPvB
 - 4.4 PMT/vPvM

Ongoing guidance consultations

REACH CLP BPR PIC

> **Guidance on the preparation of dossiers for harmonised classification and labelling (v. 3.0)**

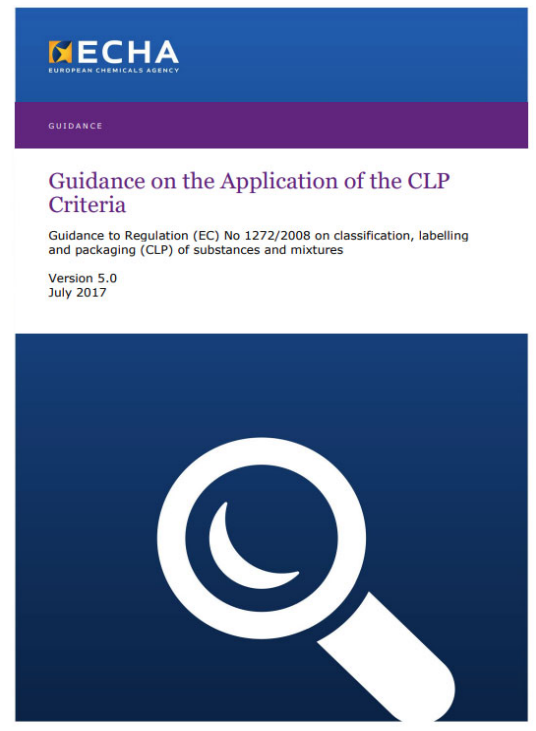
∨ **Application of the CLP criteria, Parts 3.11 and 4.2: Endocrine disruption (HH and ENV)**

Draft to PEG

Download document [PDF] (09/2023)
Composition of PEG [PDF]

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<https://echa.europa.eu/support/guidance/consultation-procedure/ongoing-clp>



ガイダンスのアップデート

- CLPクライテリアの適用に関するガイダンス
 - パート3
 - 3.11 ED HH
 - パート4
 - 4.2 ED ENV
 - 4.3 PBT/vPvB
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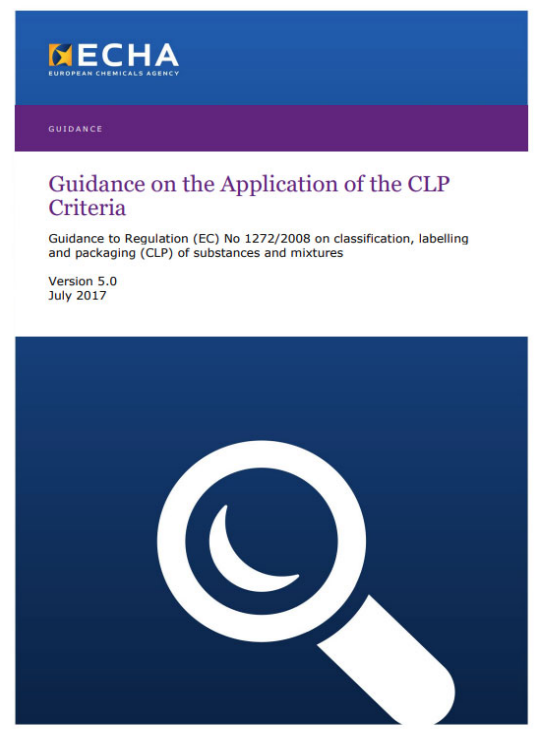
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Timelines

Q1 2023	Delegated act publication/entry into force
Q1 2023	ECHA experts initiated work on the guidance text
Q2 2023	ED expert group consultations until 31 May
Q3 2023	Launch of PEG and RAC consultations
Q1 2024	Revision of the guidance based on comments received
Q2 2024	Second round of comments
Q3 2024	Guidance publication
Q2 2025-Q4 2026	Transitional period ends for substances

EFSA provided valuable support during drafting

Drafting work and consultation is currently on-going. Changes may still be introduced during review process. Following slides reflect ECHA's current views.

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タイムライン

Q1 2023	委任法の公布/発効
Q1 2023	ECHAの専門家がガイダンス文書作成に着手
Q2 2023	ED専門家グループの協議 5月31日まで
Q3 2023	PEGとRACの協議開始
Q1 2024	寄せられたコメントに基づくガイダンスの改正
Q2 2024	第2回コメント
Q3 2024	ガイダンスの公表
2025年第2四半期~2026年第4四半期	物質に関する経過措置期間終了

EFSAは草案作成において貴重な支援を提供した

草案作成及び協議が現在進行中である。
 審査過程で変更が加えられる可能性もある。
 以降のスライドは、ECHAの現在の見解を反映したものである。

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Background for drafting the CLP guidance on EDs

- The **ECHA/EFSA guidance** used and considered mostly applicable to the ED Category 1 for HH and ENV.
- The following new paragraphs have been included:
 - Definitions
 - Identification of the data
 - Classification criteria
 - Classification in the presence of other toxicity
 - Evaluation of the data
 - Weight of evidence
 - Decision on classification
 - Setting specific concentration limits
 - Classification criteria for mixtures, different tiers
 - Hazard communication by labelling
 - Additional labelling provisions
 - **Illustrative examples for classification – best way to illustrate differences between Cat 1, 2 and NC**
 - **10 examples for ENV**



GUIDANCE



ADOPTED (ECHA): 5 June 2018
ADOPTED (EFSA): 5 June 2018
doi: 10.2903/j.efsa.2018.5311

Guidance for the identification of endocrine disruptors in the context of Regulations (EU) No 528/2012 and (EC) No 1107/2009

European Chemical Agency (ECHA) and European Food Safety Authority (EFSA) with the technical support of the Joint Research Centre (JRC)

Niklas Andersson, Maria Arena, Domenica Auteri, Stefania Barnaz, Elise Grignard, Aude Kienzler, Peter Lepper, Alfonso Maria Lostia, Sharon Munn, Juan Manuel Parra Morte, Francesca Pellizzato, Jose Tarazona, Andrea Terron and Sander Van der Linden



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EDに関するCLPガイダンス起草の背景

- ほとんどの場合においてHH及びENV ED Category 1が該当する**ECHA/EFSAガイダンス**
- 以下の新パラグラフを追加
 - 定義
 - データの特定
 - 分類クライテリア
 - 他の毒性がある場合の分類
 - データの評価
 - 科学的根拠の重み付け
 - クラス分けの決定
 - 特定の濃度限界値の設定
 - 混合物の分類クライテリア、異なる階層
 - ラベリングによる有害性コミュニケーション
 - 追加のラベリング条項
 - **分類のための例示 - Cat 1、2、NCの違いを説明する最良の方法**
 - **ENVに関する10の事例**



GUIDANCE



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Scope of the CLP guidance on EDs

- The **ED criteria** do not differentiate among modalities, thus they **cover all ED MoAs**
- **Focus of the guidance is on the EATS modalities which are the most understood:**
 - ❖ there is a relatively good mechanistic understanding on how substance-induced perturbations may lead to adverse effects via an endocrine-disrupting MoA.
 - ❖ there are at present standardised test guidelines for *in vivo* and *in vitro* testing available where there is a broad scientific agreement on the interpretation of the effects observed on the investigated parameters
- The **general principles also applicable to non-EATS modalities**
- Similarly, **focus on vertebrates (fish and amphibians)**
 - ❖ if available, information on invertebrates, birds and reptiles should be assessed and can be used to conclude on classification

EDに関するCLPガイダンスの範囲

- **EDクライテリアは介在様式を区別しないため、全ED MoAを網羅**
- **ガイダンスの焦点は、最も理解されているEATSに関してである**
 - ❖ 物質によって引き起こされる乱れが、どのように内分泌かく乱MoAを介して有害影響につながるかについては、メカニズムについて比較的よく理解されている
 - ❖ 現時点において*in vivo*及び*in vitro*試験に関する標準化試験ガイドラインがあり、調査されたパラメータに認められた影響の解釈について、幅広い科学的合意が得られている
- **一般原則は、EATS以外の様式にも適用される**
- **同様に、脊椎動物（魚類と両生類）に焦点を当てる**
 - ❖ 無脊椎動物、鳥類、爬虫類に関する情報があれば、評価し、分類の結論に役立てる

Identification of hazard information

- Information on **endocrine related adverse effects** for the environment is normally obtained from animal studies
 - In the future non-animal methods with equivalent predictive capacity to animal studies may be available;
 - Information from read-across or analogy if common MoA.
- Information on **endocrine activity** generally comes from *in vivo* or *in vitro* mechanistic studies
 - Also non-animal methods which provide equivalent predictive capacity to *in vivo* mechanistic studies
 - Information from read-across, *in silico* models or omics approaches, if available.
 - endocrine activity may also be inferred from observed adverse effects ('EATS-mediated' parameters)
- For **biological plausibility**, existing scientific knowledge can be used, e.g. textbooks and scientific literature
 - Several adverse outcome pathways (AOPs) have already been established
 - continuous development of additional AOPs

有害性情報の同定

- 環境に対する**内分泌関連の有害影響**に関する情報は、動物実験から得られる
 - 動物実験と同等の予測能力を持つ動物を用いない試験法も、将来的には利用可能になるかもしれない
 - 共通MoAがある場合は、リード・アクロス又は類推からの情報
- **内分泌活性**に関する情報は、*in vivo*又は*in vitro*のメカニズム研究から一般に得られる
 - *in vivo*メカニズム研究と同等の予測能力を提供する動物を用いない手法
 - リードアクロス、*in-silico*モデル、*omics*アプローチからの情報
 - 認められた有害影響（「EATS介在」パラメータ）から内分泌活性を推測可能かもしれない
- **生物学的に妥当な関連性**については、教科書や科学文献など、既存の科学的知識を利用できる
 - 既にいくつかの有害性発現経路（AOP）が確立されている
 - 追加的AOPの継続的な開発

Evaluation of hazard information

For the EATS modalities, the Revised OECD GD 150 provides guidance on how to interpret parameters normally investigated in (eco)toxicity guideline studies:

- Parameters that inform on **adverse effects**:
 - “EATS-mediated”
 - “Sensitive to, but not diagnostic of, EATS”
- Parameters that inform on **endocrine activity**:
 - *In vitro* mechanistic
 - *In vivo* mechanistic
 - “EATS-mediated”

In addition, results from well-performed and reported studies from the open literature may also include endocrine endpoints and can provide just as valuable and useful knowledge as results from guideline studies

有害性情報の評価

EATS介在様式については、改正OECD GD 150が（環境）毒性ガイドライン試験において通常調べられているパラメータの解釈方法についてガイダンスを提供している：

- 有害影響に関する情報をもたらすパラメータ：
 - 「EATS」介在
 - 「EATS」感受性だが断定には至らない
- 内分泌活性に関するパラメータ：
 - *In vitro*メカニズム
 - *In vivo*メカニズム
 - 「EATS」介在

更に、公表文献から適切に実施報告された試験結果には内分泌エンドポイントも含まれている場合があり、ガイドライン試験結果と同様に貴重で有益な知見の提供につながり得る

Use of mammalian data for environment

Annex I: 4.2.2.3.4. *Using a weight of evidence determination, evidence considered for the classification of a substance as an endocrine disruptor for human health referred to in section 3.11 shall be considered when assessing the classification of the substance as an endocrine disruptor for the environment under section 4.2.*

- Effects on mammals can also give information on endocrine disruption in non-mammalian vertebrates
- Data on mammals and other taxa should be considered together in a holistic approach as part of the available evidence for reaching a conclusion on the need to classify the substance.

環境影響への哺乳類データの利用

Annex I: 4.2.2.3.4. *Using a weight of evidence determination, evidence considered for the classification of a substance as an endocrine disruptor for human health referred to in section 3.11 shall be considered when assessing the classification of the substance as an endocrine disruptor for the environment under section 4.2.*

- 哺乳類への影響は、哺乳類以外の脊椎動物における内分泌かく乱作用に関する情報を与える
- 哺乳類等の生物分類群に関するデータは、その物質を分類する必要性について結論するために利用可能な科学的根拠の一部として、総合的アプローチの中で共に検討されるべきである。



Population relevance



個体群との関連性

Population relevance – text in the current guidance

Annex 1: 4.2.1.2.1. Substances and mixtures fulfilling the criteria of endocrine disruptors for the environment based on evidence referred to in Table 4.2.1 shall be considered to be known, presumed or suspected endocrine disruptors for the environment unless there is evidence conclusively demonstrating that the adverse effects identified are not relevant at the population or subpopulation level.

Annex 1: 4.2.2.1. Where there is evidence conclusively demonstrating that the adverse effects identified are not relevant at the population or subpopulation level, the substance shall not be considered an endocrine disruptor for the environment.

The assessment of the scientific evidence shall consider as adverse an effect that may impact the maintenance of wildlife populations.

Relevance of affected parameters:

- Effects on growth (body weight and length), development and reproduction (such as fecundity, sex ratio, hatching success and offspring survival) in single species are considered relevant by default
- Behavioural endpoints that affect population
- Effects in non-reproductive organs are considered relevant at the level of population when accompanied by a pattern of effects on other more apical parameters
- Effects in mammals needs to be considered in the assessment for wildlife from a different perspective
- In some cases, they may not be relevant because no impact at population level

Effect level:

- Statistically significant difference compared to the control and the biological relevance need to be considered

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個体群との関連性 – 現行ガイダンスの文章

付属書 1 : 4.2.1.2.1. 表 4.2.1 で言及されている科学的根拠に基づき、環境への内分泌かく乱物質のクライテリアを満たす物質及び混合物は、特定された有害影響が個体群レベル又は亜個体群レベルでは関連性がないことを決定的に示す科学的根拠がない限り、環境内分泌かく乱物質として既知、推定又は疑いがあるとみなされるものとする。

付属書 1 : 4.2.2.1. 特定された有害個体群レベル又は亜個体群レベルでは無関係であることを決定的に示す科学的根拠がある場合、その物質を環境への内分泌かく乱物質とみなしてはならない。

科学的根拠の評価においては、野生生物個体群の維持に及ぼし得る影響を有害影響とみなすものとする。

影響を受けるパラメータの関連性 :

- 単一種における成長（体重、体長）、発生、繁殖（繁殖率、性比、孵化率、子孫の生存率等）への影響は、予め関連性があるとみなされる
- 個体群に影響を及ぼす行動学的エンドポイント
- 非生殖器官における影響は、他のより決定的な（アピカルな）パラメータに及ぼす影響パターンを伴う場合、個体群レベルで関連性があると考えられる
- 哺乳類への影響は、野生生物に対する評価において別の観点から考慮する必要がある
- 個体群レベルでは影響がないため関連性がない場合もある

影響レベル :

- 対照群と比較しての統計学的有意差と、生物学的関連性を考慮する必要がある

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Population relevance – Specific considerations for thyroid

Data from mammals:

- ❑ Thyroid histopathological findings observed in rat are considered relevant at the population level if observed together with impairment of growth/development and/or reproduction.
- ❑ If the data package does not contain information on more apical endpoints because those were not investigated, the population relevance cannot be excluded

Data from amphibians:

- ❑ In the case of amphibians, normally apical endpoints are investigated together with thyroid histopathology.
 - changes in thyroid histopathology are considered adverse at the population level when observed together with effects on development (i.e., accelerated or asynchronous).
- ❑ Population relevance can be excluded only if thyroid histopathology is observed and development was investigated, but no concomitant effects were observed.
- ❑ If effects on development were not investigated, it cannot be excluded that changes in development would have occurred if changes in thyroid histopathology are observed.
 - in such cases changes in histopathology should be considered relevant at the population level unless available information demonstrate the contrary.

個体群との関連性 — 甲状腺に関する特別な考慮事項

哺乳類からのデータ :

- ❑ ラットで認められた甲状腺の病理組織学的所見が、成長、発育、生殖における障害とあわせて認められた場合、個体群レベルで関連性があると考えられる。
- ❑ データ・パッケージがより決定的な（アピカルな）エンドポイントに関する情報がない場合、個体群との関連性を除外することはできない。

両生類からのデータ :

- ❑ 両生類の場合、甲状腺の病理組織学的検査とあわせて決定的な（アピカルな）エンドポイントも、通常試験にて調べられている。
 - 甲状腺の病理組織学的変化が発育影響（すなわち、発育の促進又は非同調性）とあわせて認められた場合、個体群レベルで有害とみなされる。
- ❑ 甲状腺の病理組織学的所見が認められ、発育に対して付随影響が認められなかった場合に限り、個体群との関連性を除外することができる。
- ❑ 発育影響が調べられていなかったとしても、甲状腺の病理組織学的変化が認められれば、発育に変化が生じた可能性は否定できない。
 - このような場合、入手可能な情報がそれに反することを証明しない限り、病理組織学的変化は個体群レベルで関連性があると考えられるべきである。

Population relevance (2)

Annex 1: 4.2.2.1 (Table 4.2.1) However, where there is information that raises serious doubt about the relevance of the adverse effects identified at population or subpopulation level, classification in Category 2 may be more appropriate.

- Classification as Category 2 may be more appropriate when effects are observed, but there are serious doubts that those effects would be relevant at the population or subpopulation level
- This conclusion needs to be taken with caution using a weight of evidence approach

個体群との関連性 (2)

付属書 1 : 4.2.2.2.1 (表 4.2.1) ただし、ヒトへの有害影響の関連性に深い疑念を生むような情報が存在する場合は、カテゴリー2に分類する方が適切な場合がある。

- 影響が認められたが、それらの影響の個体群レベル又は亜個体群レベルでの関連性について重大な疑義が提起される場合、カテゴリー2への分類がより適切であろう。
- この結論は、科学的根拠の重み付けアプローチを用いて慎重に判断する必要がある。



Classification in the presence
of other toxicity



他の毒性がある場合の分類

Classification in the presence of other toxicity

Annex I: 4.2.2.2.2. Adverse effects that are solely non-specific consequences of other toxic effects shall not be considered for the identification of a substance as endocrine disruptor for the environment.

- Substances shall not be classified if such an adverse effect is produced solely as a non-specific secondary (indirect) consequence of other toxic effects.
- The presence of **other toxicity** i.e. (adverse) effects other than the endocrine-related adverse effects shall not be used to negate findings of endocrine-related adverse effects
- If ED effects observed with **co-occurring other toxicity**, case by case evaluation considering aspects such as dose/concentration response and severity of the other toxicity
- Endocrine-related adverse effects observed **below the concentration where other toxicity is observed**, can be considered as secondary to other (non-endocrine) toxicities only if substantiated by the MoA analysis (comparative assessment needed)

他の毒性がある場合の分類

付属書 1 : 4.2.2.2.2 他の毒性作用の非特異的な結果にとどまるような有害影響は、環境に対する内分泌かく乱物質として同定する判断材料にしてはならない。

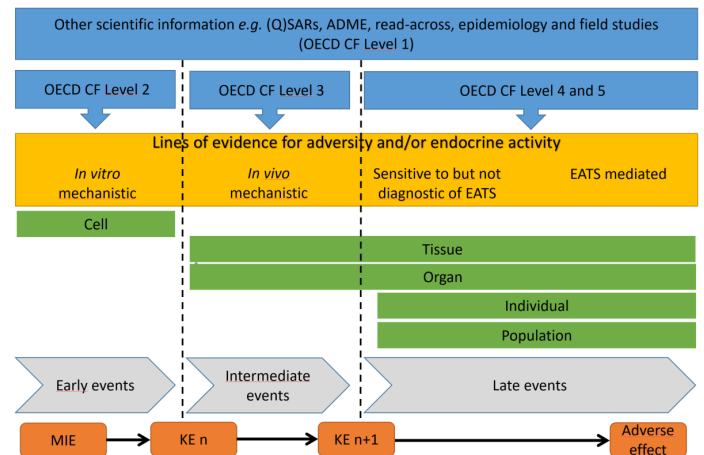
- そのような有害影響が、他の毒性作用の非特異的な二次的（間接的）結果としてのみ生じる場合、物質は分類されないものとする。
- 内分泌関連有害影響以外の毒性、すなわち（有害）作用の存在は、内分泌関連有害影響の所見を否定するために用いてはならない。
- 他の毒性を併発しながら ED 影響が認められた場合、用量/濃度反応や他の毒性の重篤度などの面を考慮し、ケースバイケースで評価する。
- 他の毒性が認められる濃度以下で認められる内分泌関連の有害影響は、MoA分析によって立証された場合に限り、他の（内分泌以外の）毒性による二次的なものとみなすことができる（比較評価が必要）。

Biologically plausible link

- First step is to gather information from scientific literature / existing knowledge on possible endocrine-related MoAs related to the types of adverse effects and endocrine activity observed for the substance
- The evidence available for the substance shall be assessed against the **hypothesis for mode of action**
- Existing **adverse outcome pathway (AOPs)** and modes-of-actions can be used **as a starting point** for the postulated mode of action against which the evidence can be systematically organised.
- Evidence on adverse effect(s) and endocrine activity, assessed for **dose and temporal concordance**, can provide **empirical support to the Key Events (KEs)**.

!!! For non-mammalian data, the empirical support will be mainly based on the evaluation of the dose/concentration-response relationship due to the available data set not often allowing for the evaluation of the temporal concordance and consistency among species (often only studies on a single species are available).

Annex I: 4.2.2.3.3. Using a weight of evidence determination, the link between the endocrine activity and the adverse effects shall be established based on biological plausibility, which shall be determined in light of available scientific knowledge. The biologically plausible link does not need to be demonstrated with substance specific data.



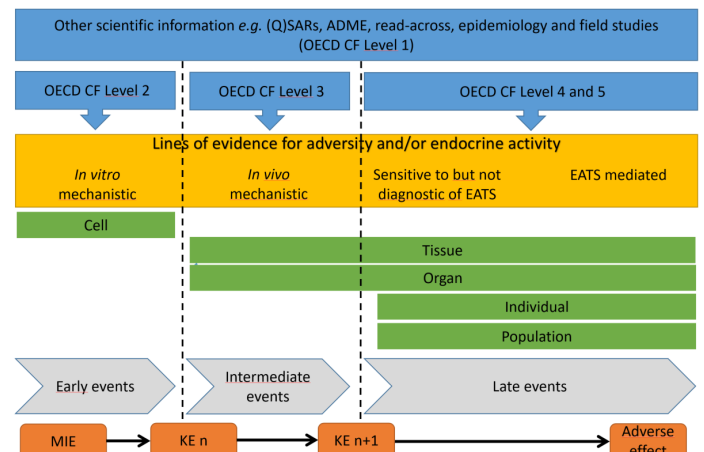
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生物学的に妥当なリンク

- 最初のステップは、その物質に認められた有害影響の種類と内分泌活性に関連する潜在的内分泌関連 MoA について、科学文献や既存知見から情報を収集することである。
- その物質について入手可能な科学的根拠は、作用機序の仮説に照らして評価されなければならない。
- 既存の有害性発現経路 (AOPs) 及び作用機序は、科学的根拠を体系的に整理するために、想定される作用機序の出発点として使用することができる。
- 有害影響と内分泌活性に関する科学的根拠は、用量と時間的な一致を評価することで、主要事象 (KEs) の経験的裏付けを与えることができる。

!!!哺乳類以外のデータについては、入手可能なデータセットが生物種間の時間的一貫性や一貫性を評価できないことが多いため (単一生物種に関する研究しか入手できない場合が多い)、経験的には、主に用量・濃度-反応性の評価に基づくことになる。

附属書 I : 4.2.2.3.3. 化学的根拠の重み付け (weight of evidence) を用いて、内分泌活性と有害影響との関連を、利用可能な科学的知見に照らして決定される生物学的に妥当な関連性 (biological plausibility) に基づいて確立しなければならない。生物学的に妥当な関連性は、物質固有のデータで証明する必要はない。

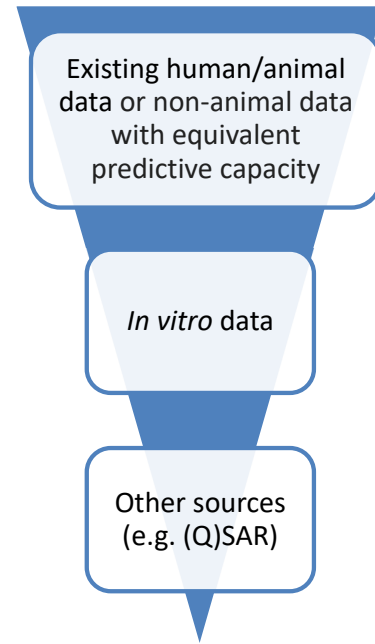


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Weight of evidence – factors to be considered

Annex I: 4.2.2.3.2. In applying the weight of evidence determination and expert judgement, the assessment of the scientific evidence referred to in section 4.2.2.3.1 shall, in particular, consider all of the following factors:

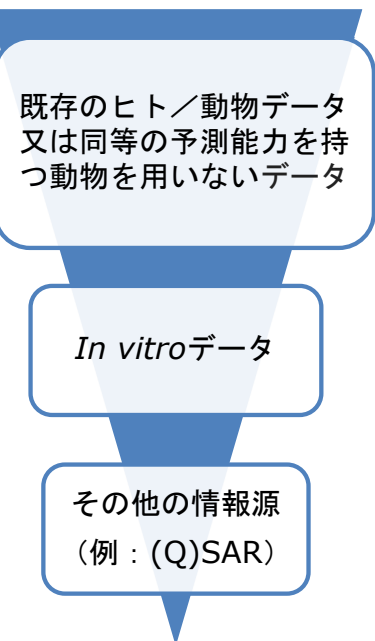
- (a) both positive and negative results;
- (b) the relevance of the study design for the assessment of adverse effects and its relevance at the population or subpopulation level, and for the assessment of the endocrine activity;
- (c) the adverse effects on reproduction, growth/development, and other relevant adverse effects which are likely to impact on populations or subpopulations;
- (d) the quality and consistency of the data, considering the pattern and coherence of the results within and between studies of a similar design and across different species;
- (e) the route of exposure, toxicokinetic and metabolism studies;
- (f) the concept of the limit dose (concentration), and international guidelines on maximum recommended doses (concentrations) and for assessing confounding effects of excessive toxicity;
- (g) where available, adequate, reliable and representative field or monitoring data or results from population models.



科学的根拠の重み付け - 考慮すべき要素

付属書 1 : 4.2.2.3.2. 証拠の重み付けの判断及びエキスパートジャッジを実施する際、4.2.2.3.1項で言及された科学的証拠の評価は、特に以下の全要素を考慮するものとする :

- (a) 陽性及び陰性の結果
- (b) 個体群又は亜個体群レベルでの有害影響の評価、そして内分泌活性の評価に向けた試験研究の設計の妥当性
- (c) 生殖、成長/発達に及ぼす有害影響、及び個体群又は亜個体群に影響を及ぼす可能性のあるその他の関連有害影響
- (d) 異なる生物種横断的に類似した設計がなされた試験研究における試験内及び試験間における結果の整合性を考慮した際のデータの質と一貫性
- (e) 曝露経路、毒物動態及び代謝に関する試験研究
- (f) 限界量（濃度）の考え方、最大量（濃度）勧告値に関する国際的ガイドラインについての考え方、過剰毒性による交絡影響の評価に向けた考え方
- (g) 入手可能な場合、適切で信頼できる代表的なフィールド又はモニタリング・データ、又は個体群モデルからの結果





Decision on classification



クラス分けの決定

Decision on classification (1)

- Classification based on:
 - **Strength of evidence** for the three elements (adversity, endocrine activity, biological plausible link) in **WoE approach**
- **Expert judgement** necessary
- Evidence for the three elements always needed for both cat 1 and cat 2
- **Population relevance** of the adversity needed for both cat 1 and cat 2
- Plausible biological link always needed:
 - existing knowledge on endocrinology / (eco)toxicology may be sufficient to assess the biological plausibility (e.g. if MoA mainly established and empirically supported on the basis of EATS-mediated parameters).
 - understanding of the key event relationship (KER) based on previous documentation and broad acceptance (e.g. established AOP)
- However, classification warranted also when there is not enough information to postulate a detailed mode of action due to the lack of thorough mechanistic information (e.g. when difficult to identify specific modality due to complexity and cross-talk of endocrine system)

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クラス分けの決定(1)

- 以下に基づく分類：
 - **WoEアプローチにおける3つの要素（有害性、内分泌活性、生物学的関連性）の科学的根拠の強さ**
- **専門家の判断が必要**
- 常にcat 1及びcat 2の両方に必要とされる3要素についての科学的根拠
- cat 1及びcat 2の両方に必要な有害性の個体群との関連性
- 妥当な生物学的関連性が常に必要とされる：
 - 内分泌学や（環境）毒性学に関する既存知識は、生物学的に妥当な関連性を評価する上で十分であろう（例えば、主にEATSを介したパラメータに基づいてMoAが確立され、経験的に裏付けられた場合）。
 - 過去の文書中での言及や広く受け入れられていること（例えば、確立されたAOPなど）に基づく、キーイベントの関連性（KER）への理解
- ただし、作用機序に関する十分な情報がないため、詳細な作用機序を推定するだけの十分な情報がない場合でもクラス分けが必要である（例えば、内分泌系の複雑さやクロストークにより作用機序を特定することが困難な場合など）

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Decision on classification (2)

- Elements to be considered in deciding between category 1, category 2 and no classification:
 - ✓ **Consistency of results** e.g. positive and negative / pointing towards different directions
 - ✓ issues with **study design** such as dose/concentration level setting etc.
 - ✓ **lack of some data** that would be needed to increase certainty
- Some illustrative scenarios (and examples) provided in the guidance (e.g. on the basis of 'EATS mediated' or 'sensitive to, but not diagnostic of, EATS' parameters)
- The advice given in the guidance is not binding, but tries to illustrate the most likely outcomes
- Ultimately, **case-by-case decision**

クラス分けの決定(2)

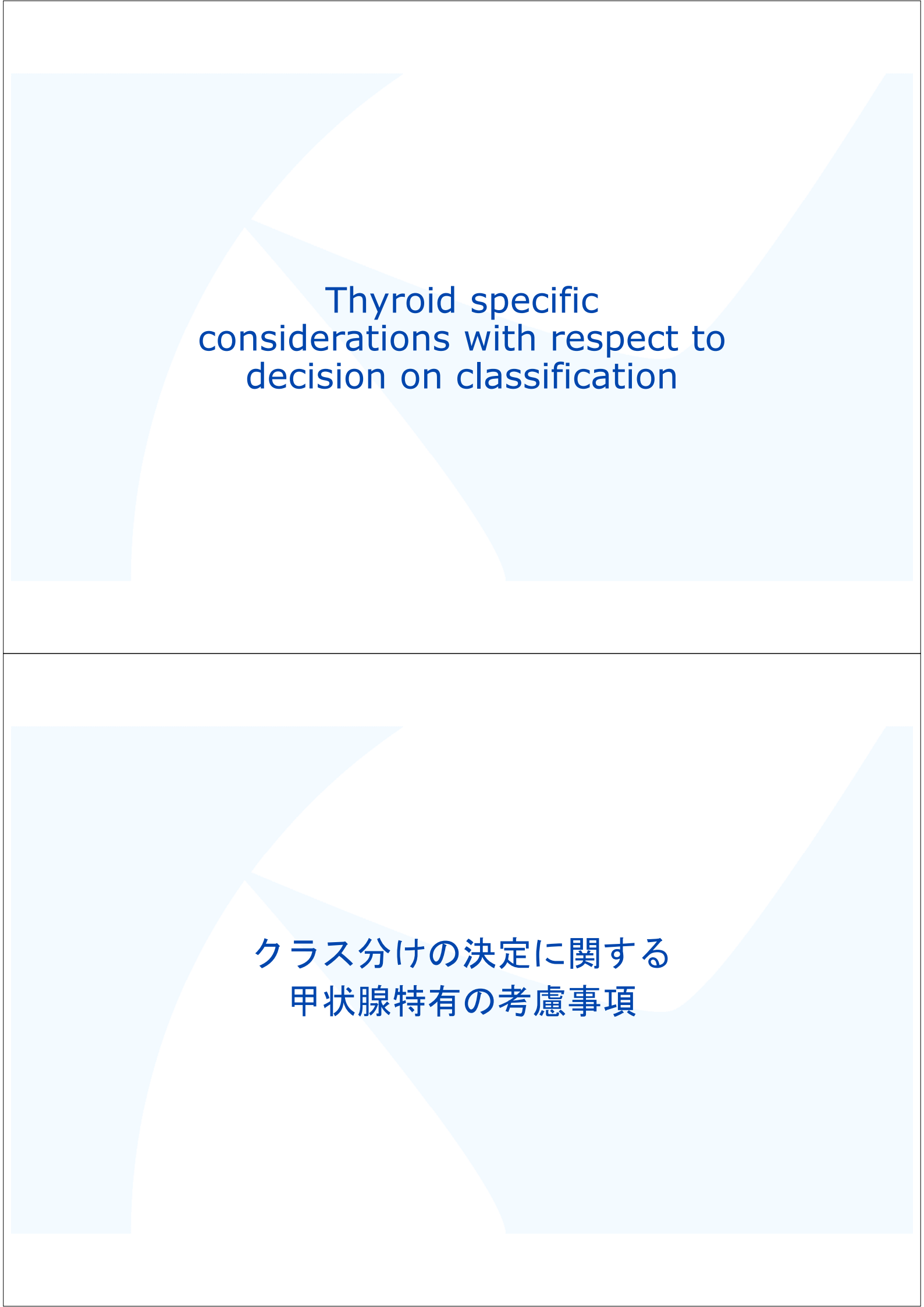
- カテゴリー1、カテゴリー2、クラス分けなしのいずれかを決定する際に考慮すべき要素：
 - ✓ **結果の一貫性** 例えば、陽性と陰性や異なる方向性
 - ✓ 用量/濃度レベルの設定など、**試験デザイン**に関する問題
 - ✓ 確実性を高めるために必要な**一部データの欠如**
- ガイダンスに示されたいくつかの例示的シナリオ（及び例）（例えば、「EATSを介する」又は「EATS感受性だがEATSとは診断されない」パラメータに基づく）
- ガイダンスが示す助言は拘束力を持つものではないが、最も可能性の高い結果を示すものである
- 最終的には**ケースバイケースで決定**

No classification

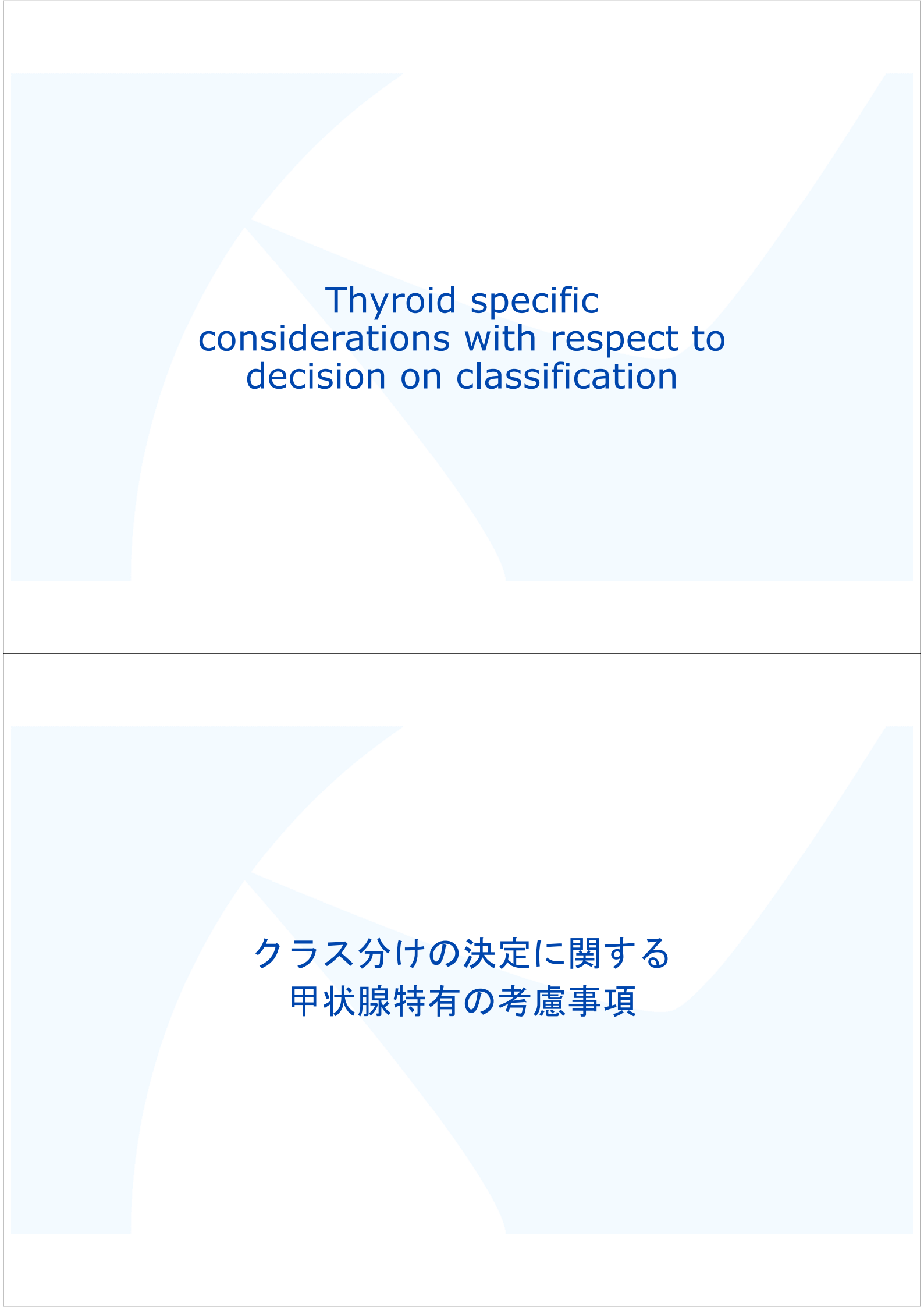
- adversity is not observed, or
- adversity not relevant at population level (Env) or
- endocrine activity is not observed or
- if adversity is solely a non-specific consequence of other toxic effects, i.e. when a non-endocrine MoA has been demonstrated to be the most likely explanation of the observed adverse effects
- when adverse effects are observed which cannot be linked to the observed endocrine activity using existing knowledge, therefore, a biological plausible link cannot be established.

クラス分けできない

- 有害性が認められない、あるいは
- 有害性は個体群レベル（Envでは関連性がない）、あるいは
- 内分泌活性は認められないか
- 有害性が他の毒性作用の非特異的な結果に過ぎない場合、すなわち、認められた有害影響の説明として内分泌以外のMoAが最も可能性が高いことが証明された場合
- 認められた内分泌活性と関連づけることができない有害影響が認められた場合、既存知見では生物学的に妥当な関連性を確立することができない。



Thyroid specific
considerations with respect to
decision on classification



クラス分けの決定に関する
甲状腺特有の考慮事項

ENV Thyroid specific considerations

- Classification of a substance as *ED ENV* can, in some situations, already be reached considering the available evidence on the thyroid modality from mammals
 - E.g. **If adversity observed in mammals is population relevant** (e.g. neurodevelopmental effects)
 - Category 1 ED ENV (no need for other data)
- If adverse effect(s) observed in mammals, taking into account the whole data package in a weight of evidence approach, are considered **not relevant at the population level**:
 - classification for environment is warranted **only when there is information specific for the environment proving the population relevance of the effects.**
 - The allocation to category 1 or 2 will depend on the type of evidence available and on the strength of that evidence.

ENV 甲状腺特有の考慮事項

- 哺乳類からの甲状腺介在様式に関する入手可能な科学的根拠を考慮すると、状況によっては、*ED ENV*としての物質のクラス分けに既に達している場合もあり得る。
 - 例：哺乳類で認められた有害性が個体群に関連する場合（神経発達への影響など）。
 - カテゴリー1 ED ENV（他のデータは不要）
- 哺乳類で認められた有害影響が、科学的根拠の重み付けアプローチにおいてデータパッケージ全体を考慮した結果、個体群レベルでは関連性がないと考えられる場合：
 - 環境に関するクラス分けが正当化されるのは、影響の個体群との関連性を証明する環境特有の情報がある場合のみである。
 - カテゴリー1又は2への分類は、入手可能な科学的根拠の種類及びその強さによって決まる。

Overview of ENV examples

Example number	Classification	Modalities covered	Description
Example 1	ED ENV cat 1	EAS	There are no data available in fish or other wildlife organisms, therefore classification is solely based on data on mammals showing adverse effect(s) at population level.
Example 2	ED ENV cat 1	EAS	Data-rich substance (e.g. pesticide)
Example 3	ED ENV cat 2	EAS	Data-poor substance (e.g. industrial chemical under REACH)
Example 4	ED ENV cat 2	EAS	Adverse effect(s) observed are not convincing enough to place the substance in Category 1
Example 5	ED ENV cat 2	EAS	Adverse effect(s) observed are associated to 'Sensitive to, but not diagnostic of, EATS' parameters
Example 6	ED ENV cat 2	EAS	Data-poor substance (e.g. industrial chemical under REACH)
Example 7	ED ENV cat 2	T	Classification based on data only on the metabolite
Example 8	ED ENV cat 2	Non-EATS	Data on birds used
Example 9	No classification	EAS	No classification as no adverse effect(s) (the only effects are observed in the presence of other toxicity) and no endocrine activity identified
Example 10	No classification	EATS	No classification as no adverse effect(s) and no endocrine activity identified.

ENV例の概要

例番号	カテゴリー	対象介在様式	説明
例1	ED ENV cat 1	EAS	魚類やその他の野生生物ではデータがないため、カテゴリーは個体群レベルでの有害影響を示す哺乳類のデータのみに基づく
例2	ED ENV cat 1	EAS	データが豊富な物質（例えば、農薬など）
例3	ED ENV cat 2	EAS	データに乏しい物質（例えば、REACHにおける工業化学物質）
例4	ED ENV cat 2	EAS	認められた有害影響は、その物質をカテゴリー1に分類するだけの十分な説得力がない。
例5	ED ENV cat 2	EAS	認められた有害影響は、「EATS感受性はあるが、EATSとは診断できない」パラメータに関連する。
例6	ED ENV cat 2	EAS	データに乏しい物質（例えば、REACHにおける工業化学物質）
例7	ED ENV cat 2	T	代謝物のみのデータに基づく分類
例8	ED ENV cat 2	EAS以外	鳥類データを使用
例9	分類なし	EAS	有害影響がなく（他の毒性が存在する場合にのみ影響が認められる）、内分泌活性が確認されなかったため分類なし
例10	分類なし	EATS	有害影響はなく内分泌活性も確認されなかったため分類せず

Thank you

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