



# The new guidance on Environmental risk assessment of feed additives

Parma, 20/11/2019


# INDEX

## Point of discussion


- ❖ Background
- ❖ Phase I: different steps
- ❖ Phase II: Environmental Risk Assessment
  - Phase II A – different steps & examples
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- ❖ New EXCEL tool for calculation



## BACKGROUND



**Mandate:** “The guidance on environmental risk assessment should be completely revised in order to take into account of new developments in methodology and the extensive documentation produced by EFSA Scientific Committee and other bodies (EMA, OECD).”



## BACKGROUND


# FEEDAP Guidance ERA feed additives 2008

- Based in two phases (I and II)
- When specific thresholds are reached in terrestrial or aquatic compartments in phase I, a phase II ERA assessment is needed.
- Harmonised with the CVMP/VICH (2005) Guideline for the terrestrial compartment
- In line with REACH Guideline for the aquatic compartment



## BACKGROUND

### NEW GUIDANCE

- 
- Harmonisation within EFSA (e.g. pesticides, Scientific Committee new guidance)
  - Harmonisation with other assessment bodies like EMA and ECHA (a contact has been established with EMA/CVMP)
  - New developments in the field
  - The experiences gained in the past years (2008 up to now)
  - Characteristics: **practical** (to help in solving problems), **short, simple** (as much as been possible), covering uncertainties (as much as possible), cross refers to internal/external documents (EFSA, CVMP) or appendices

## BACKGROUND

### DISCUSSION GROUP

#### In compliance with the EFSA's Stakeholder Engagement Approach

- A call was sent to Consumers, Environmental/health NGOs and advocacy groups, Farmers and primary producers, Business and food industry, Practitioners' associations, Academia and Member States
- Business and feed industry organisations (6) and Association of practitioners (1) proposed 10 candidates
- 3 of Business and feed industry organisations were selected. They could comment the draft guidance at different stages of development.





## BACKGROUND

### PUBLIC CONSULTATION ON THE ERA GUIDANCE

From 8 Oct to 19 Nov 2018

EFSA received 133 comments from 11 interested parties

- 6 public organisations, (Spanish Medicines Agency (AEMPS), ISS, Institute of Marine Research, German Environment Agency (UBA), Institute of the Republic Slovenia for Nature Conservation and University of Ljubljana, Biotechnical Faculty)
- 1 industry associations (FEFANA)
- 1 private companies (Puratos)
- 3 consultant organisations (SCC Scientific Consulting Company, Pen&Tec Consulting, S.L.U. and Association of Veterinary Consultants)

## NEW GUIDANCE

### Guidance more structured

- More structured: different phases are clearly identified, data requirements are tabled with specific guidelines
- Better explained: questions of phase I have their own explanations; appendices provide tools and further explanations
- However clause: possibility to deviate (whenever scientifically based!) both for evaluators and applicants.
- Guidance developed for **both** the applicants **and** the evaluators





## NEW GUIDANCE

Guidance more structured

**NEVERTHELESS**



**This guidance is still a  
guidance, establishing major  
rules, unable to cover all  
possible situations in a risk  
assessment**



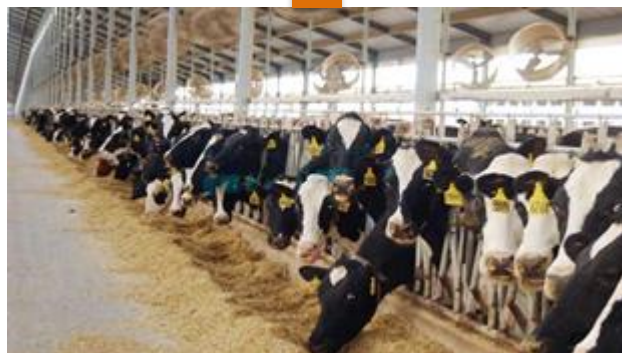
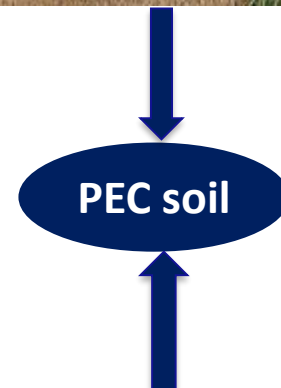
## WHICH ENVIRONMENT?

# Environmental compartments to protect

- Agricultural soils that receive animal slurry contaminated with feed additives
- The water compartment of surface water (input via drainage and run-off from agricultural fields, or via land-based fish farms)
- The ground water compartment (input via leaching from soil), and
- The sediment compartment (at least for fish farmed in cages)

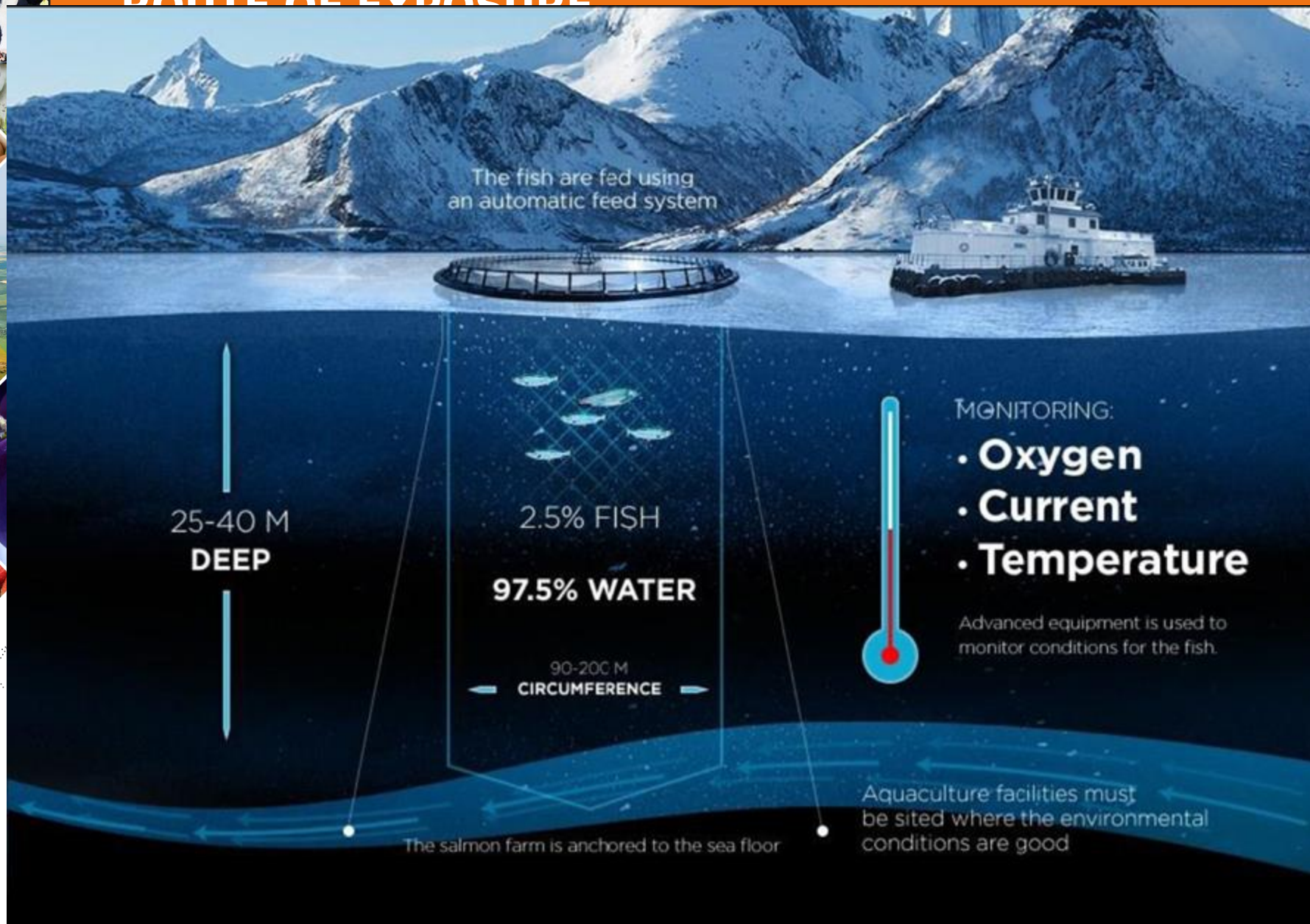


# ROUTE OF EXPOSURE





## ROUTE OF EXPOSURE



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# GUIDANCE ENVIRONMENT

## Two phases

### Phase I

- Decision tree: exclusion criteria from a complete ERA
- Preliminary identification of problematic substances
- Screening based on exposure

### Phase II

- Complete risk assessment
- Different steps of increasing complexity

**The ERA of major species can be extrapolated to minor species when the same use is proposed.**





## PHASE I

### Phase I

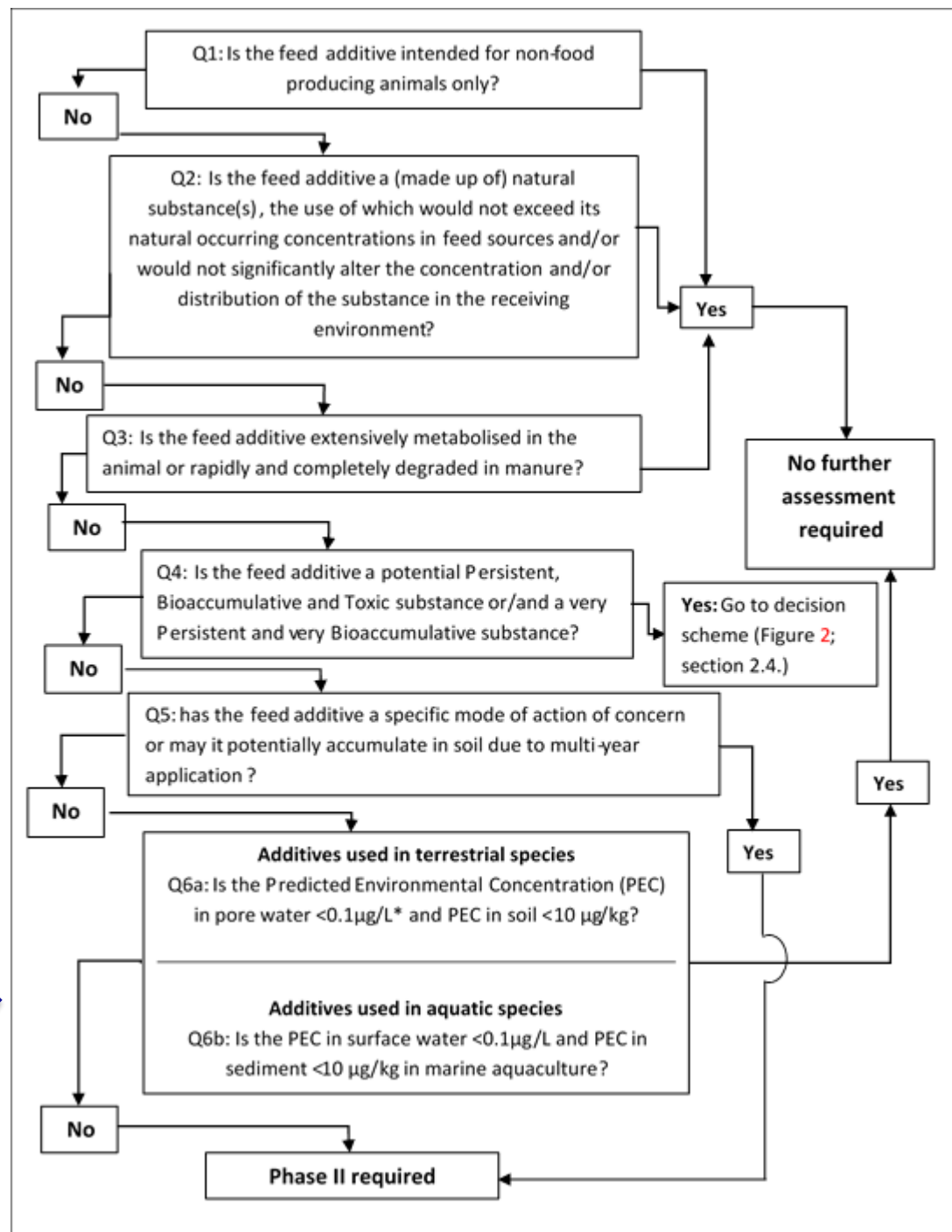
- Phase I is based on a list of questions (decision tree).
- Questions: explanations/examples provided to clarify the meaning.
- The decision tree describes the process needed to evaluate a substance



**Q1, Q2, Q3:**  
Exclusion criteria  
from an ERA

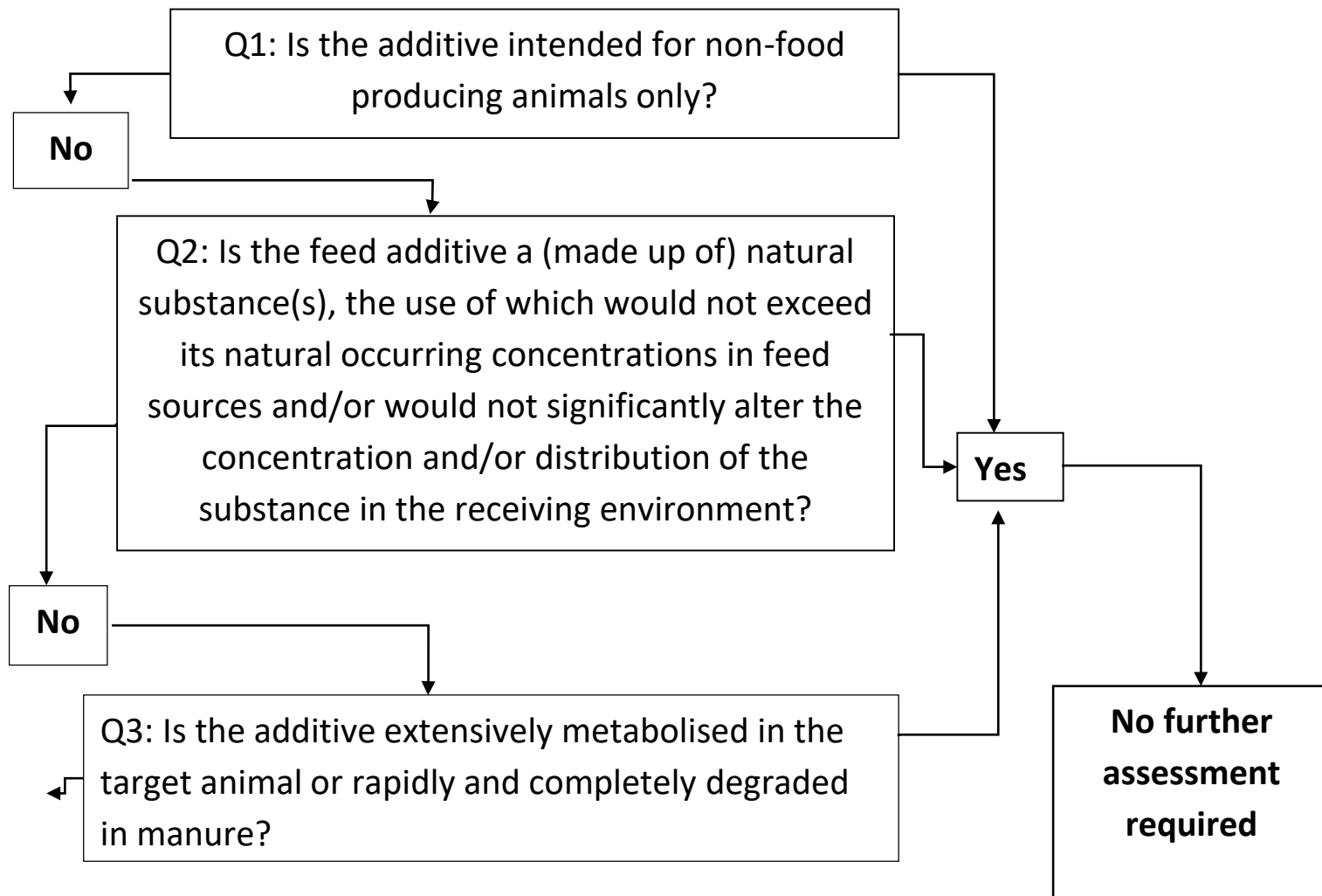
**Q4, Q5:**  
identification of  
substances of  
concern

**Q6: Exposure vs.  
trigger**



## PHASE I – EXCLUSION CRITERIA

### Phase I: exclusion criteria



## PHASE I – EXCLUSION CRITERIA


### Questions of Phase I

- **Question 1:** Is the additive intended for non-food producing animals only?

Generally, non-food producing animals are not intensively reared or/and their excrements are not spread over agricultural land. Therefore, due to the limited total amount of product used, feed additives for non-food animals are expected to produce less environmental concern than the feed additives in food-producing animals.



## PHASE I – EXCLUSION CRITERIA

- 
- **Question 2:** Is the feed additive a (made up of) natural substance(s), the use of which would not exceed its natural occurring concentrations in feed sources or plants that potentially occur in habitats near the receiving environment?

Evidence should be provided showing that comparable concentrations of the feed additive can be expected in other plant(s) and/or that the use of the feed additive will not significantly alter the concentration of the additive in the receiving environmental compartments of concern.

## PHASE I – EXCLUSION CRITERIA

**Example 1 (iron and methionine):** The components of the additive, iron and methionine, are ubiquitous in the environment.

The iron content of soils is typically in the range of 5,000–50,000 mg/kg; the predicted PEC<sub>soil</sub> is around 1.75 mg/kg after a 1-year application of manure, assuming that 100% of the dose will be excreted.

Methionine as amino acid is a physiological and natural component of animals and plants.

After dissociation of the ingested additive, methionine is not excreted as such (but as urea/uric acid, sulphate and CO<sub>2</sub>). Therefore the use of iron and methionine in animal nutrition would not lead to any localised increase in the concentration in the environment.






## PHASE I – EXCLUSION CRITERIA

### **Astaxanthin for salmonids.**

Astaxanthin in the environment is synthesised by algae. Algae contain up to XXX mg/kg carbon .... In unfiltered sea water, natural astaxanthin is present in the range of XXX ng/L ..... Shrimp can contain natural astaxanthin in the range XXXX mg/kg total dry weight ..... Natural astaxanthin accumulates in wild salmon via the food chain.... For salmon in cages to develop a red colour similar to wild salmon, they must receive a similar dose of ATX. If it would be possible to give salmon in cages the same feed as wild salmon the natural astaxanthin in the sediment would be the same. The use of synthetic ATX does not pose a significant additional risk to the environment compared with natural astaxanthin



## PHASE I – EXCLUSION CRITERIA

- 
- **Question 3:** Is the additive extensively metabolised in the target animal or rapidly and completely degradable in manure?

**Extensively metabolized:** converted into metabolites present in the excreta that do not possess a biological activity of environmental concern, like water, CO<sub>2</sub> and common salts.

### Degradation in manure.

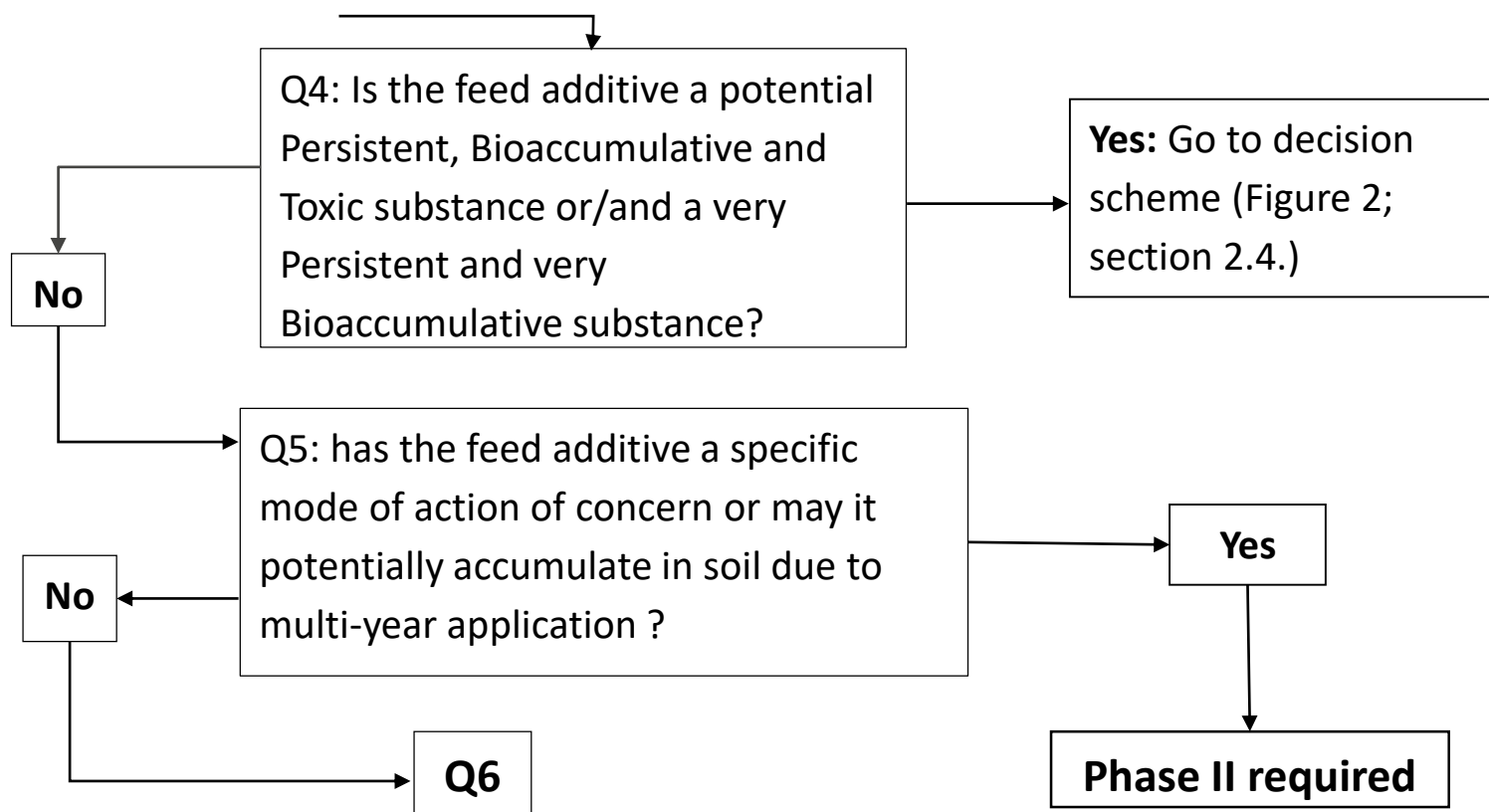
The active substance has to be rapidly and **completely** degraded in manure (inter-species extrapolation of data can be applied):

1. total mineralisation or
2. presence of degradation products all presenting 5% or less of the dose,

[http://www.ema.europa.eu/docs/en\\_GB/document\\_library/Scientific\\_guideline/2009/10/WC500004386.pdf](http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline/2009/10/WC500004386.pdf)

## PHASE I - Identification of substances of concern

### Phase I: identification of substances of concern



## PHASE I - Identification of substances of concern

- **Question 4:** Is the feed additive a potential PBT or/and vPvB substance?

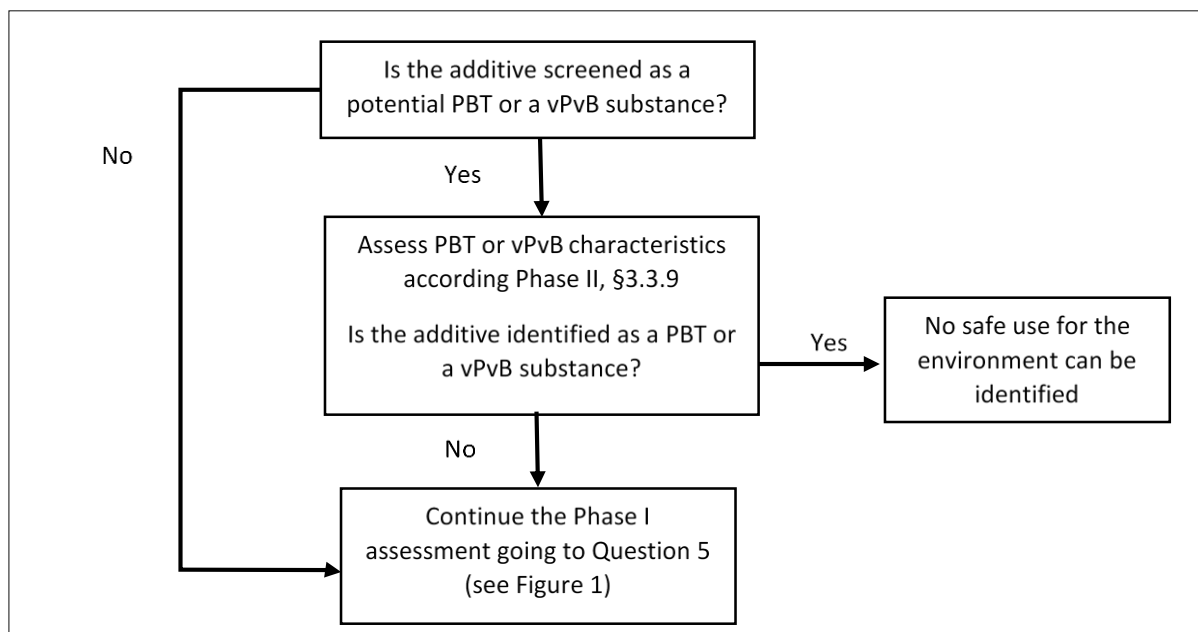
**PBT/vPvB substances:** potential to accumulate in parts of the environment difficult to reverse. Stop of emission not necessarily reduce chemical concentration

**PBT or vPvB substances:** potential to contaminate remote areas to be protected from further contamination by hazardous substances due to the intrinsic value of pristine environments

Effects of accumulation unpredictable in the long-term

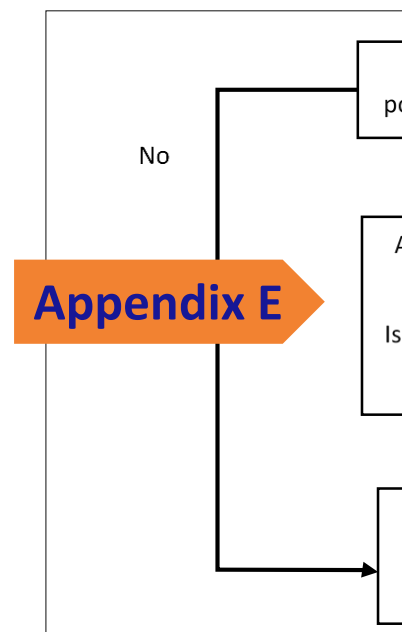
## PHASE I - Identification of substances of concern

### Decision scheme for PBT or vPvB



# PHASE I - Identification of substances of concern

## Decision

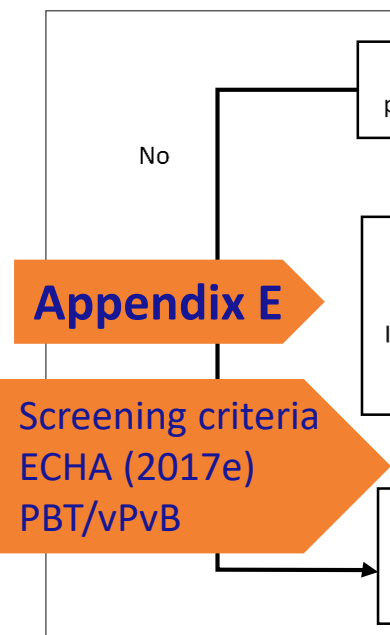


Property	PBT-criteria	vPvB-criteria
<b>Persistence</b>	<p>A substance fulfils the persistence criterion (P) in <b>any</b> of the following situations:</p> <ul style="list-style-type: none"> <li>• <math>T_{1/2} &gt; 60</math> days in marine water;</li> <li>• <math>T_{1/2} &gt; 40</math> days in fresh- or estuarine water;</li> <li>• <math>T_{1/2} &gt; 180</math> days in marine sediment;</li> <li>• <math>T_{1/2} &gt; 120</math> days in fresh- or estuarine sediment;</li> <li>• <math>T_{1/2} &gt; 120</math> days in soil.</li> </ul>	<p>A substance fulfils the "very persistent" criterion (vP) in <b>any</b> of the following situations:</p> <ul style="list-style-type: none"> <li>• <math>T_{1/2} &gt; 60</math> days in marine, fresh- or estuarine water;</li> <li>• <math>T_{1/2} &gt; 180</math> days in marine, fresh- or estuarine sediment;</li> <li>• <math>T_{1/2} &gt; 180</math> days in soil.</li> </ul>
<b>Bioaccumulation</b>	<p>A substance fulfils the bioaccumulation criterion (B) when: BCF &gt; 2000</p>	<p>A substance fulfils the "very bioaccumulative" criterion (vB) when: BCF &gt; 5000</p>
<b>Toxicity</b>	<p>A substance fulfils the toxicity criterion (T) in <b>any</b> of the following situations:</p> <ul style="list-style-type: none"> <li>• NOEC or <math>EC_{10} &lt; 0.01</math> mg/L for marine or freshwater organisms;</li> <li>• substance is classified as carcinogenic (category 1A or 1B), germ cell mutagenic (category 1A or 1B), or toxic for reproduction (category 1A, 1B or 2);</li> <li>• there is other evidence of chronic toxicity, as identified by the classifications: STOT (repeated exposure), category 1 (oral, dermal, inhalation of gases/vapours, inhalation of dust/mist/fume) or category 2 (oral, dermal, inhalation of gases/vapours, inhalation of dust/mist/fume) according to the CLP Regulation.</li> </ul>	-



# PHASE I - Identification of substances of concern

## Decision



Type of screening information	Screening criterion	Conclusion
<b>Persistence</b>		
Biowin 2 (non-linear model prediction) and Biowin 3 (ultimate biodegradation time)	Does not biodegrade fast (probability <0.5) <sup>(a)</sup> and ultimate biodegradation timeframe prediction: ≥ months (value < 2.25 (to 2.75) <sup>b)</sup>	Potentially P or vP
or		
Biowin 6 (MITI non-linear model prediction) and Biowin 3 (ultimate biodegradation time)	Does not biodegrade fast (probability <0.5) <sup>(a)</sup> and ultimate biodegradation timeframe prediction: ≥ months (value <2.25 (to 2.75) <sup>(b)</sup> )	Potentially P or vP
or		
other models (a)	Model specific values	Potentially P or vP
Ready biodegradability test (including modifications allowed in the respective TGs)	≥70% biodegradation measured as DOC removal (OECD TGs 301A, 301E and 306) or ≥60% biodegradation measured as ThCo2 (OECD TG 301B) or ThOD (OECD TGs 301C, 301D, 301F, 306 and 310) <sup>(c)</sup>  <70% biodegradation measured as DOC removal (OECD TGs 301A, 301E and 306) or <60% biodegradation measured as ThCo2 (OECD TG 301 B) or ThOD (OECD TGs 301C, 301D, 301F,306 and 310)	Not P and not vP  Potentially P or vP
Enhanced screening tests <sup>(d)</sup>	biodegradable not biodegradable <sup>(d)</sup>	Not P and not vP Potentially P or vP

# PHASE I - Identification of substances of concern

## Decision

### Appendix E

### Screening criteria ECHA (2017e) PBT/vPvB

Type of screening information	Screening criterion	Conclusion
Specified tests on inherent biodegradability: - Zahn-Wellens (OECD TG 302B) - MITI II test (OECD TG 302C)	$\geq 70$ % mineralisation (DOC removal) within 7 d; log phase no longer than 3d; removal before degradation occurs below 15%; no pre-adapted inoculum	Not P and not vP
	Any other result (e)	Potentially P or vP
	$\geq 70$ % mineralisation (O <sub>2</sub> uptake) within 14 days; log phase no longer than 3d; no pre-adapted inoculum	Not P and not vP
	Any other result (e)	Potentially P or vP
<b>Bioaccumulation</b>		
Octanol-water partitioning coefficient (experimentally determined or estimated by QSAR)	$\text{Log Kow} \leq 4.5$	not B and not vB (f) (in aquatic organisms)
	$\text{Log Kow} > 4.5$	Potentially B or vB (in aquatic organisms)
Combination of the Octanol water partitioning coefficient with the octanol air partitioning coefficient (both experimentally determined or estimated by QSAR)	$\text{Log Kow} > 2$ and $\text{Log Koa} > 5$	Potentially B (in air-breathing organisms)
<b>Toxicity</b>		
Short-term aquatic toxicity (algae, daphnia, fish)	$\text{EC}_{50}$ or $\text{LC}_{50} < 0.01$ mg/L (g)	T criterion considered to be definitely fulfilled
Short-term aquatic toxicity (algae, daphnia, fish)	$\text{EC}_{50}$ or $\text{LC}_{50} < 0.1$ mg/L (g)	Potentially T
	not biodegradable (d)	Potentially P or vP

## PHASE I - Identification of substances of concern

- **Question 5:** has the feed additive a specific mode of action of concern or may it potentially accumulate in soil due to multi-year application?

**Coccidiostats and histomonostats** are chemicals with a **specific toxic mode-of-action** .....may be toxic to non-target organisms in environments that receive poultry and rabbit manure.

**Substances that are very persistent or not degradable** may accumulate in the receiving compartment(s). When there is already evidence (either experimental or by screening) that a feed additive is very persistent or not degradable, e.g. metals, these substances have to be assessed in Phase II.  
**Trigger of 10 µg/kg does not consider accumulation.**

## PHASE I – Exposure vs. trigger

### ■ Question 6a – Terrestrial animals

Is the Predicted Environmental Concentration (PEC) in **pore water**\*  $<0.1\mu\text{g/L}$  and PEC in **soil**  $<10\mu\text{g/kg}$ ?


### ■ Question 6b – Aquatic animals

Is the PEC in **surface water**  $<0.1\mu\text{g/L}$  and PEC in **sediment**  $<10\mu\text{g/kg}$  in marine aquaculture?

\*PEC in ground water is set equal to PEC in pore water

## PHASE I – Exposure vs. trigger

### Exposure calculation – worst case

- 
- ❖ Additive continuously applied at the maximum dose to the feed of the target animals;
  - ❖ Total intake of the active substance is totally excreted as parent compound;
  - ❖ Annual nitrogen load standard is 170 kg N/ha/y
  - ❖ No dissipation of the parent compound during storage and spreading of slurry/manure;
  - ❖ The additive is mixed in the soil up to 5 cm depth.



# PHASE I – EXPOSURE CALCULATION

## Default values for feed intake and nitrogen excretion

Animals	Body weight start-end (kg)	Productive cycles/year <sup>(1)</sup>	Feed intake (kg/animal place per year) <sup>(2)</sup>	Nitrogen excreted (kg/animal place per year)
Piglet	7-30	7.4	296	4
Pig for fattening	30-115	3.2	800	9
Sow with piglets	200	2.4	1140	23
Cattle for fattening	250-630	1.2	4050	54
Veal calf	45-250	1.5	730	11
Dairy cow <sup>(3)</sup>	650	0.92	6584	125
Lamb for fattening	4-32	1.5 <sup>(7)</sup>	273	5
Sheep for fattening	15-55	1.5 <sup>(7)</sup>	267	5
Meat sheep	60	1	607	10
Dairy sheep	60	1	580	10
Dairy goat	50	1	714	16.4
Chicken for fattening	0.045-2.2	6.5	22	0.33
Laying hen <sup>(4)</sup>	1.4-2	0.84	42	0.8
Turkey for fattening <sup>(5)</sup>	0.05-10(f)/16(m)	2.6	70	1
Rabbit for fattening	0.9-3.1	4.8	30	0.5
Horse <sup>(6)</sup>	500	1	3650	58
Horse for fattening	270-480	1.5 <sup>(7)</sup>	2385	43



# PHASE I – EXPOSURE CALCULATION TERRESTRIAL

## PEC in soil

Concentration of the additive in feed: input data

$$PEC_{manure} = \frac{C_{add} \times FI_{total}}{N_{excreted}}$$

Total feed intake (DM) per animal per year: Table 1  
 Total N excretion per animal per year: Table 1

$$PEC_{soil\ dw} = \frac{PEC_{manure} \times Q}{RHO_{d\ soil} \times CONV_{area\ field} \times DEPTH_{field}}$$

Annual nitrogen emission standard: default  
 Bulk density of (dry) soil: default  
 Default: 10000 m<sup>2</sup>/ha  
 Mixing depth with soil: default 0,05 m

# PHASE I – EXPOSURE CALCULATION TERRESTRIAL

## PEC in soil

Concentration of the add

### Worst case PEC

	Pig for fattening	1 animal per year: Table 1
	Cattle for fattening	
	Piglet	
$PEC_{soil}$	Turkey for fattening	
	Chicken for fattening	
	Veal calf	1 animal per year: Table 1
	Horse	
	Meat sheep	
	Rabbit for fattening	
	Dairy sheep	1 animal per year: Table 1
	Horse for fattening	
	Lamb for fattening	
	Sheep for fattening	1 animal per year: Table 1
	Dairy cow	
	Laying hen	
	Sow with piglets	
	Dairy goat	

$PEC_{soil\ dw} =$

Bulk density of (dry) soil:  $\rho_{soil}$

1 animal per year: Table 1

$H_{field}$

mixing depth with soil:  
default 0,05 m

## PHASE I – EXPOSURE CALCULATION TERRESTRIAL

**PEC in groundwater is set equal to PEC in pore water.**

Worst-case assumption, neglecting transformation and dilution in deeper soil layers.  
Same simple calculations with default values.

$$PEC_{manure} = \frac{C_{add} \times FI_{total}}{N_{excreted}}$$

Mixing depth with soil:  
default **0.2 m**

$$PEC_{soil\ ww} = \frac{PEC_{manure} \times Q}{RHO_{w\ soil} \times CONV_{area\ field} \times DEPTH_{field}}$$

$$PEC_{pw} = \frac{PEC_{soil\ ww} \times RHO_{w\ soil}}{K_{soil\ water} \times 1000}$$

$K_{oc}$ : OC partition coefficient  
(correlation with  $K_{ow}$  or water  
solubility or QSAR calculation)

MOLW:  
Molecular weight

SOL: Water solubility  
(phys – chem or QSAR)

VP: Vapour pressure  
(phys – chem or QSAR)



## PHASE I – EXPOSURE CALCULATION

### Feed ration and water flow rate in fish farming in EU

Fish types	Feed Ration (kg feed/kg fish per day)	Water flow rate (L/kg fish and day)
Salmon	0.01	<b>865</b>
Rainbow trout	0.02	<b>1400</b>
Sea bass/Sea bream	0.01	<b>400</b>
Turbot	<b>0.01</b>	<b>720</b>

# PHASE I – EXPOSURE CALCULATION AQUATIC

## Aquaculture: sea cages versus land-based aquaculture

**Land-based fish farms:** organisms living in the water column at risk from discharge to shallow freshwater ecosystems.

Simple calculations with default values.

## Land-based fish farms

Concentration of the additive in feed: input data

$$PEC_{swaq} = \frac{C_{add} \times FR}{Flow \times DF}$$

The equation is annotated with arrows indicating the input variables:  
 - A red arrow points to  $C_{add}$  from the text "Concentration of the additive in feed: input data".  
 - A blue arrow points to  $FR$  from the text "Feed Ration".  
 - A blue arrow points to  $Flow$  from the text "Water flow rate".  
 - A blue arrow points to  $DF$  from the text "Dilution Factor".





# PHASE I – EXPOSURE CALCULATION AQUATIC

## Aquaculture: sea cages versus land-based aquaculture

**Sea cages** organisms living in or on sediments are most at risk.

Simple calculations with default values.

### Sea cages

Concentration of the additive in feed: input data

$$PC_{faeces} = C_{add} \times CF$$

Conversion factor (kg feed to kg total carbon in faeces)

Max deposition rate of faeces

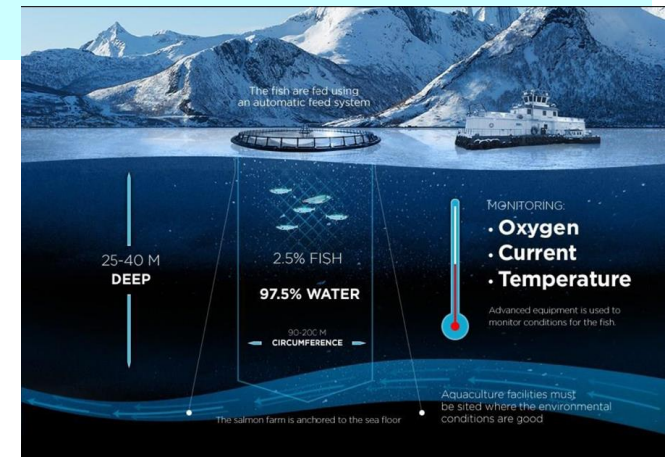
$$PEC_{sed} = \frac{PC_{faeces} \times k_{dep} \times T_{production}}{RHO_{solid} \times F_{solid} \times DEPTH_{sed}}$$

No. of production days

Mixing depth in sed: 0.05 m

Bulk density of solids: default

Volume fraction of solids in sed





## PHASE I – Exposure vs. trigger

In the last ten years,  
PEC calculations  
often performed in  
different ways

New EXCEL tool available  
onto EFSA website for  
harmonised PEC calculations

Phase I PEC  
(soil and GW and/or SW and/or SED)

Is the trigger  
exceeded?

yes

Phase II

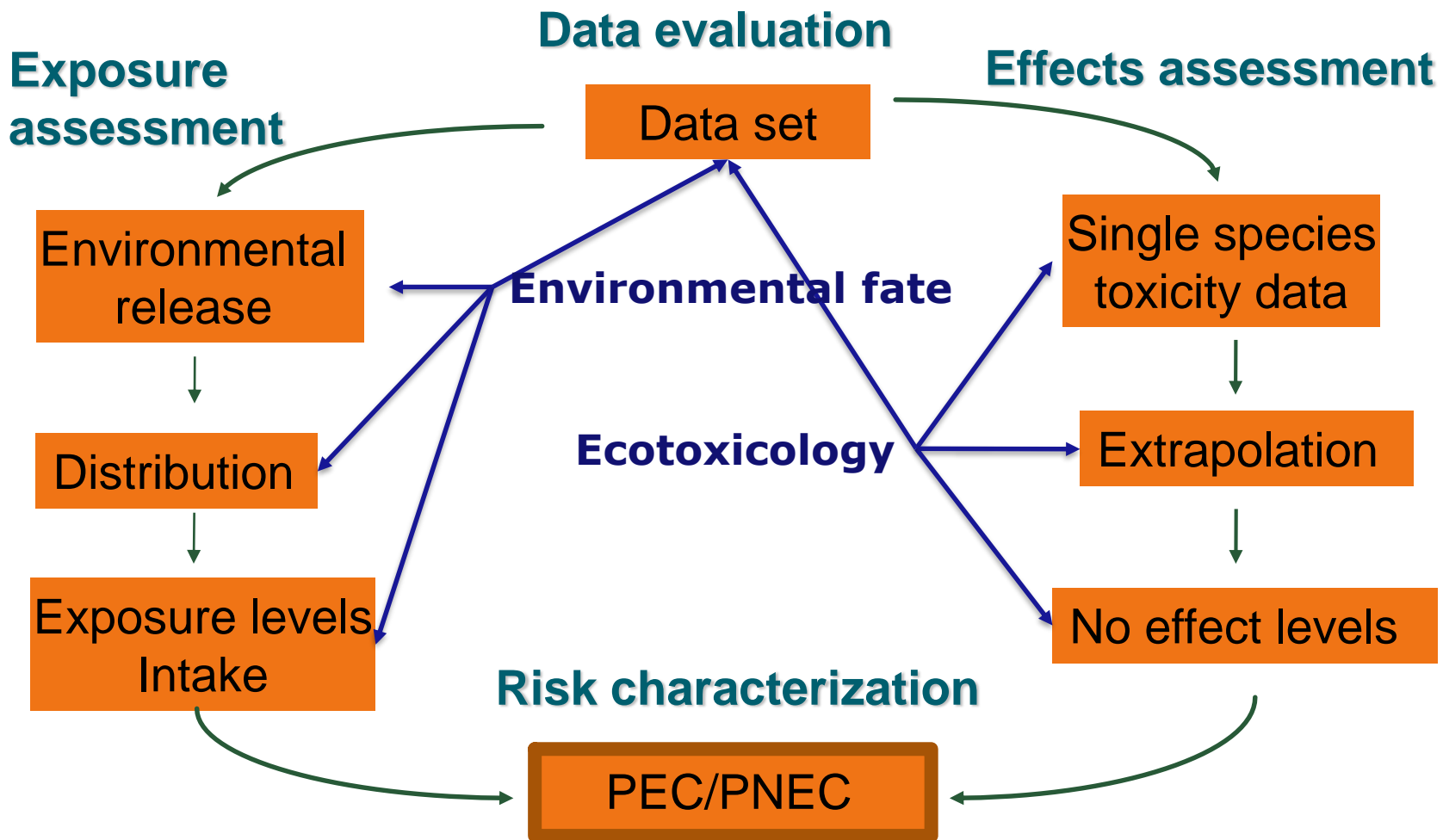
no

Safe use  
identified

An ERA based on  
experimental data is  
necessary

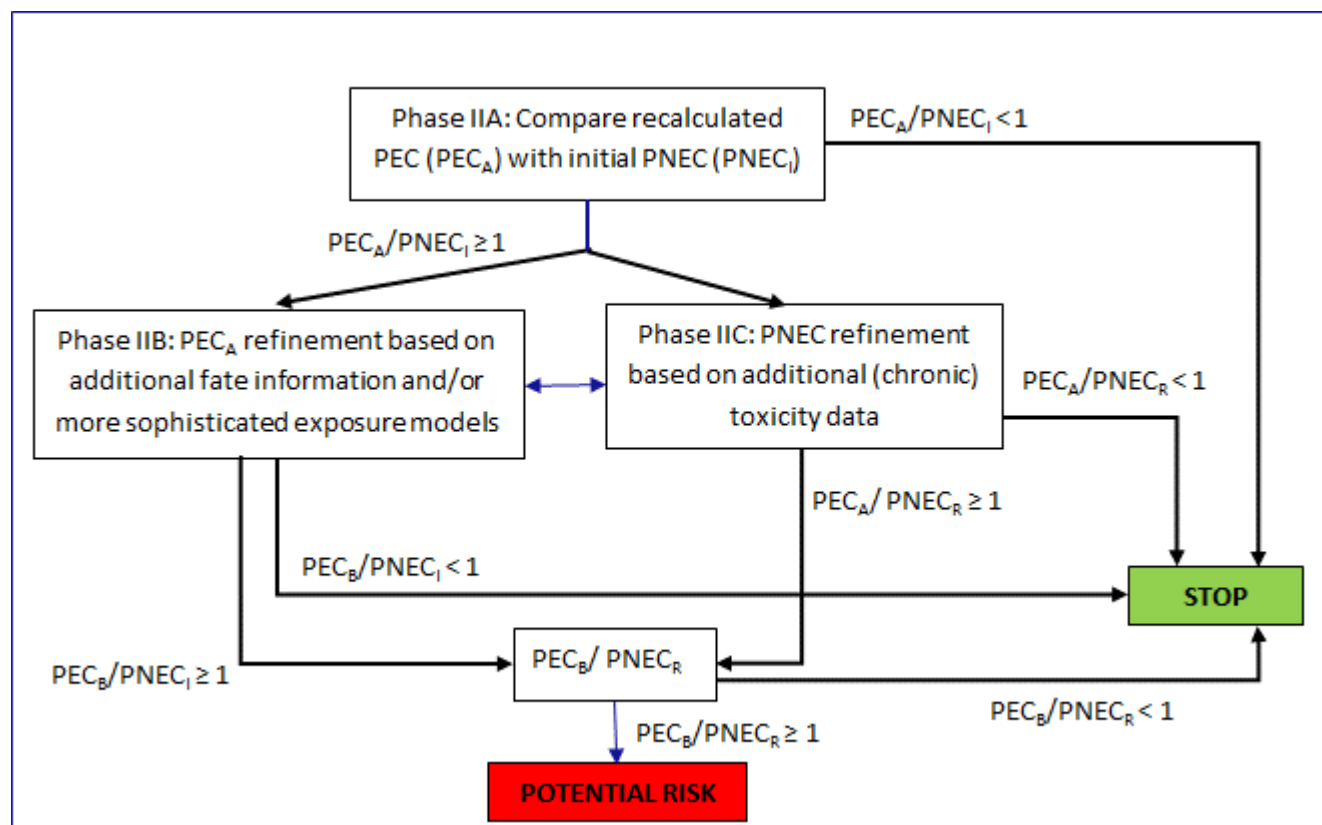


# ENVIRONMENTAL RISK ASSESSMENT



# PHASE II ASSESSMENT

## Different Steps, different complexity



## PHASE II: BASE SET DATA REQUIREMENTS

**Basic physico-chemical properties** are needed to evaluate the fate and toxicity of the feed additive

### PHYSICAL-CHEMICAL STUDIES

Water Solubility

Dissociation Constant

UV-Visible Absorption Spectrum

Vapour Pressure

n-Octanol/Water Partition

Melting point/melting range

OECD 105

OECD 112

OECD 101

OECD 104

OECD 107, 117 or 123

OECD 102

Affect distribution in  
different compartments

Potential to photodegrade  
and/or phototoxicity

May affect adsorption on soils and sediments

Calculation only, unless VP  
may exceed  $10^{-5}$  Pa at 20° C.

Different guidelines depending on  
compound characteristics (i.e. lipophilic)

## PHASE II: ENVIRONMENTAL FATE STUDIES

### Environmental fate studies

Study	Guideline
Soil Adsorption/Desorption	<u>OECD 106/121</u>
Soil Biodegradation (route and rate)	<u>OECD 307</u>
Water/sediment degradation (route and rate, optional)	<u>OECD 308</u>
Photolysis in water (optional)	<u>OECD 316</u>
Hydrolysis (optional)	<u>OECD 111</u>

Required just for the  
terrestrial branch.

Required both for terrestrial  
and aquatic animals.

Required just for additives used in aquaculture or for  
higher tier modelling with FOCUS SW

Recommended just for  
additives used in aquaculture





## SOIL DEGRADATION

# Aerobic degradation in soil (OECD 307)

- ❑ Controlled conditions, dark, ( $20 \pm 2^\circ \text{ C}$ , pF 2-2.5).
- ❑ Samples extracted and analysed for a.i, metabolites and volatiles. 120 days study.
- ❑ Soil selection: sandy loam, silty loam, loam, loamy sand; pH=5.5-8; OC%=0.5-2.5%



### Critical points:

High recovery in the study  
At least 4 soils, to use a geomean value  
 $DT_{50}$  derived according SFO (FOCUS guideline)



## WHICH KINETICS?

### Which criteria?

- The SFO kinetics, where possible, is the preferred mode for deriving a proper  $DT_{50}$
- For PEC calculations:
  - **Geometric mean value** when there are no dependence on soil properties such as clay or pH.
  - Parameters derived by **best-fit kinetics** from lab (**normalised to 12°C**). If not SFO, longest phase to be used
- As input for exposure modelling of higher tier:  
**Geometric mean value** derived by **SFO kinetics** from laboratory (**normalised to 20°C**); for higher-tier modelling also bi-phasic kinetics possible.



## ADSORPTION TO SOIL

### Soil adsorption/desorption studies (OECD 106)

- $K_d$  : distribution coefficient, simple ratio of sludge or soil to solution concentration at equilibrium

$$K_d = \frac{C_{soil}}{C_{water}}$$

- For neutral organic compounds often the  $K_d$  is related to the organic content of sludge or soil. In these cases the  $K_d$  is normalised

$$K_{oc} = \frac{K_d}{\text{percentage organic carbon}} \times 100$$

- Aim: to determine the strength of sorption of a.s. to soil

## ADSORPTION TO SOIL

# Soil adsorption/desorption studies (OECD 106)

### CRITICAL POINTS

- ☐ High recovery range for labelled substances
- ☐ At least 4 soil to be selected according to the guidance
- ☐ Attention when:
  - Active substance shows a weak sorption
  - Active substance is adsorbed on the test vessel
  - Active substance declines during the study



## ADSORPTION TO SOIL

### OECD 121

- ❖ Useful for chemicals difficult to study (i.e. substances volatile, not soluble in water at a concentration which can be measured analytically, with a high affinity to the surface of incubation systems)
- ❖ A minimum of six reference points, at least one above and one below the expected value of the test substance should be used.

**More reliable than a QSAR evaluation**



## PHASE II A PEC– TERRESTRIAL ANIMALS

### Phase I PEC recalculation

**Experimental data:** may lower or increase PECs

Recalculation based on metabolism

**Reduction of excreta:**  
lower  $PEC_{soil}$   
lower  $PEC_{sw}$   
lower  $PEC_{gw}$

Recalculation based on degradation in soil for persistent compound ( $PEC_{soil \text{ plateau}}$ )

**higher  $PEC_{soil}$   
higher  $PEC_{sw}$   
higher  $PEC_{gw}$**

Recalculation based on  $DT_{50}$  in soil under multiple applications

**Applicable in few cases;  
lower  $PEC_{soil}$**



## PHASE II A PEC– TERRESTRIAL ANIMALS

### Phase I PEC recalculation

#### Groundwater

- ❖ Recalculation  $PEC_{pw}$  and  $PEC_{pw \text{ plateau}}$

#### Surface water and sediment

- ❖  $PEC_{sw} = 1/3 PEC_{\text{groundwater}}$
- ❖  $PEC_{sed}$  from  $PEC_{sw}$  – Equilibrium partitioning



## PHASE II A PEC– AQUACULTURE

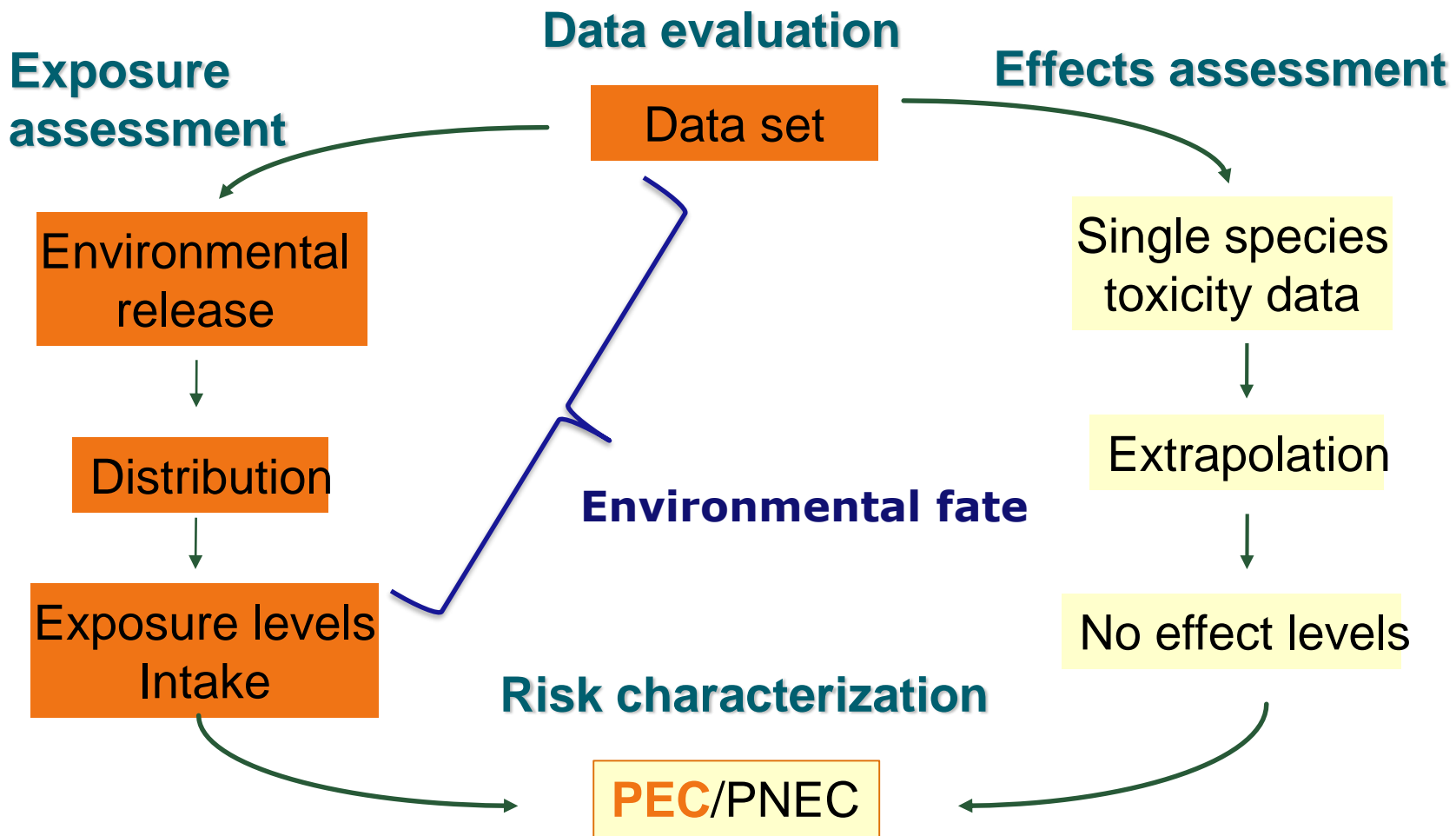
### Phase I PEC recalculation

#### **Aquaculture (freshwater and marine)**

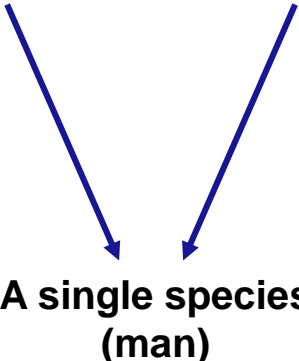
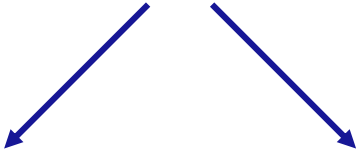
- ❖ There are no advanced models accepted at EU level which can be suggested for the refinement of the exposure for marine and freshwater aquaculture.
- ❖ In Phase I it is assumed that there is no retention in the system.
- ❖ In Phase II, for freshwater aquaculture, this could be considered as a further PEC refinement.
- ❖ An applicant could also present further assessment, using other modelling tools, more studies or relevant arguments provided that these models, studies and/or arguments are scientifically underpinned.



# ENVIRONMENTAL RISK ASSESSMENT



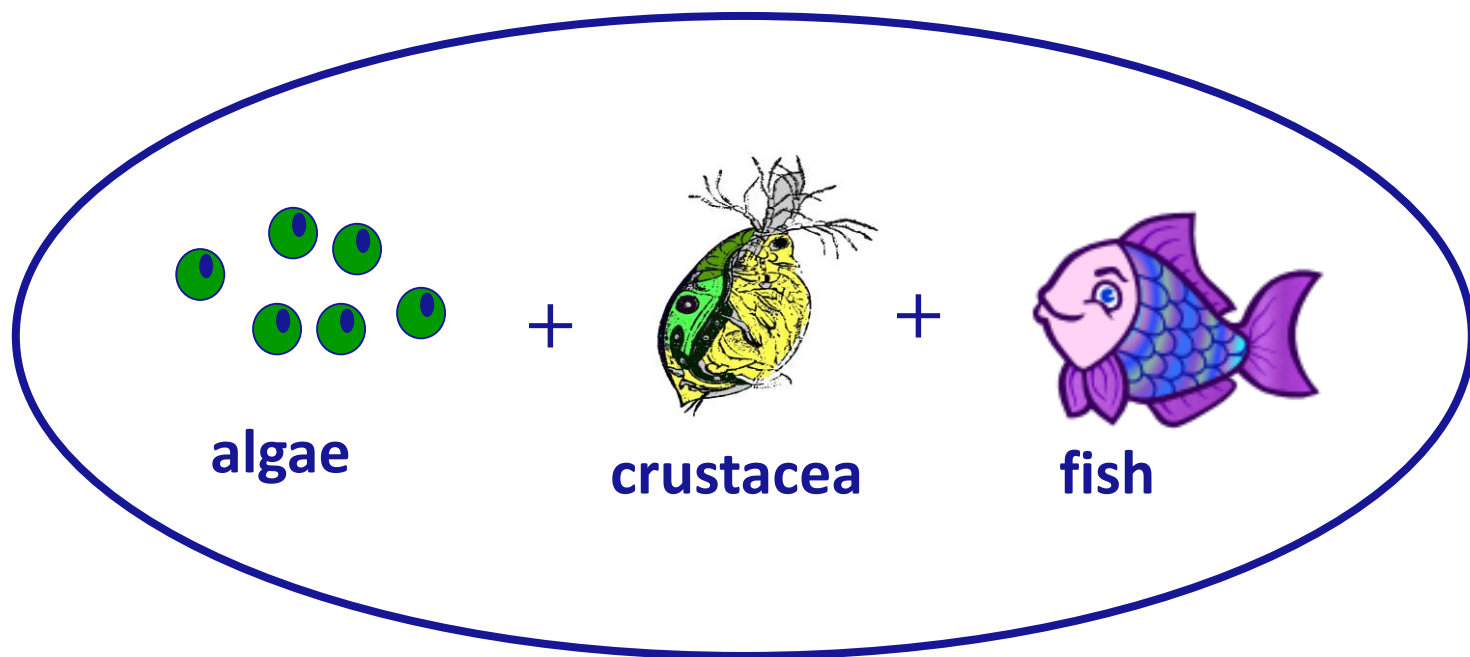
# DIFFERENCES BETWEEN TOX AND ECOTOX

		Toxicology	Ecotoxicology
<b>Methods</b>	<p>Tests on a small number of indicator organisms</p> <p><i>Extrapolation to</i></p>	<p>Rat, rabbit, dog, monkey, etc.</p>  <p>A single species (man)</p>	<p>Aquatic (algae, Daphnia Fish)</p> <p>Terrestrial ( plants, bee earthworm, birds)</p>  <p>All existing species of biological communities and ecosystems</p>

<b>Objectives</b>		Protection of individuals	Maintaining structure and function of ecosystems
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## PHASE II A: EFFECT ASSESSMENT

- various trophic levels
- laboratory testing (single species; standardised test)





## PHASE II A: EFFECT ASSESSMENT

### ERA - Considered organisms

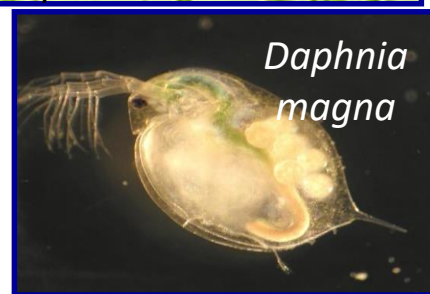
#### Terrestrial Organisms

- Earthworms
- Soil micro-organisms
- Non-target plants



#### Aquatic Organisms

- Fish
- Aquatic invertebrates
- Algae



#### Sediments

Sediment dwellings



## PHASE II A: EFFECT ASSESSMENT

### **Predicted No Effect Concentration (PNEC)**

Critical review of the reliability of test results (often based on OECD criteria)

An extensive literature search may provide information on the safety of the feed additive under the proposed conditions of use for the environment.

Selection of key studies with lowest reliable  $LC_{50}$ /  $EC_{50}$ / NOEC

Application of Appropriate Assessment Factor (1000/100/50/10)



## PHASE II A: EFFECT ASSESSMENT

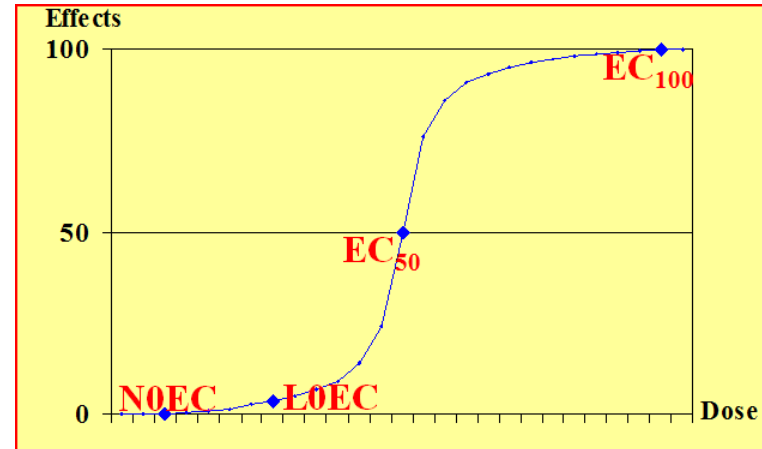
# Predicted No Effect Concentration (PNEC)

### Why a safety factor?

- Variation intra- and inter-species
- Variation intra- and inter-laboratory
- Extrapolation short-term to long-term
- Extrapolation laboratory to field
  - bioavailability, ageing
  - competition, food web interaction
  - adaptation, recovery

## PHASE II A: EFFECT ASSESSMENT

### Acute toxicity tests



### Laboratory defined & controlled conditions

- Range of test concentrations, doses, rates + control(s) or limit test
- Covers range 100 to 0 % effect (often, but not always mortality)
- Endpoints: LC/EC<sub>50</sub> - LD<sub>50</sub> - LR/ER<sub>50</sub> (Conc which is expected to produce an effect in 50% of the test population)

## PHASE II A: EFFECT ASSESSMENT

### Terrestrial environment

Study	Toxicity endpoint	AF	Remark
Nitrogen Transformation (28 days) – <b>OECD 216</b>	$\leq 25\%$ of control	1	Exposure 1X and 10X $PEC_{max}$
Terrestrial plants (14-21 d) <b>OECD 208</b>	$EC_{50}$	100	The most sensitive endpoint (emergence, biomass or height of sprout) of all plant species tested
Earthworm acute (14 d) <b>OECD 207</b>	$LC_{50}$	1,000	-



## PHASE II A: EFFECT ASSESSMENT

### OECD 207 – Earthworms

LC<sub>50</sub> mg/kg dry weight soil

Test duration: 14 days

One concentration resulting in no mortality and one resulting in total mortality should be used

Validity criteria: mortality in the controls ≤10 %



## PHASE II A: EFFECT ASSESSMENT

### OECD 208 – Terrestrial plants

- ❖ 6 species (at least two monocot and two dicot species)
- ❖ Duration: 14-21 days after 50% control plants emerged
- ❖ Validity criteria: control seedling emergence  $\geq 70\%$ , no visible phytotoxic effects mean survival of emerged seedlings  $\geq 90\%$
- ❖ Endpoints: emergence, mortality, growth (weight, height), visual phytotoxicity



## PHASE II A: EFFECT ASSESSMENT

### OECD 216 - Nitrogen Transformation

Decisive parameter: the magnitude of effects compared to the untreated control, and the time-course of recovery.

The critical level is  $\leq 25\%$  difference from control after 28 days.

Larger deviation will require further refinement.

It is recommended to compare directly the test concentrations to the PEC values before to conclude on potential risk.



## PHASE II A: EFFECT ASSESSMENT

### Freshwater compartment (including sediment)

Study	Toxicity endpoint	AF	Remark
Algal growth inhibition* <b>OECD 201</b>	72h $E_rC_{50}^{**}$	1,000	$E_yC_{50}^{***}$ may be used if $E_rC_{50}$ not reported
Daphnia immobilization <b>OECD 202</b>	48-h $EC_{50}$	1,000	-
Fish acute toxicity <b>OECD 203</b>	96-h $LC_{50}$	1,000	-

- \* In case problems arise with coloured additives, *Lemna* ([OECD 221](#)) can be used
- \*\*  $E_rC_{50}$ : the concentration of test substance which results in a 50 percent reduction in growth rate;
- \*\*\*  $E_yC_{50}$ : the concentration of the test substance with results in a 50% reduction of yield.

## PHASE II A: EFFECT ASSESSMENT

### OECD 201: Freshwater alga

- ❖ At least 5 tested concentration plus control, 3 replicates per treatment
- ❖ Duration 72 h
- ❖ Endpoint: growth rate inhibition  $E_rC_{50}$
- ❖ Validity criteria:
  - Exponential growth of biomass in control (at least  $16 \times$  in 72-h)
  - Coefficient of variation of control growth rate  $< 7\%$
- ❖ Analytical measurements mandatory (pH, oxygen, test substance)

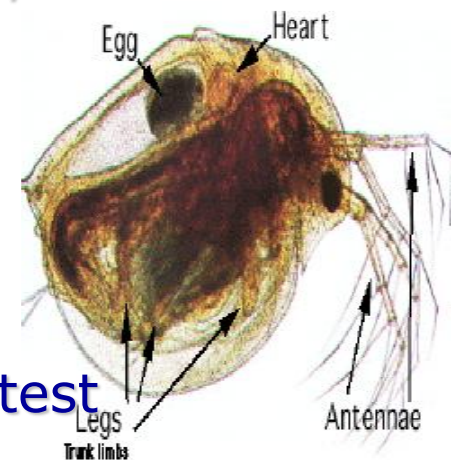




## PHASE II A: EFFECT ASSESSMENT

### OECD 202: *Daphnia magna* acute

- ❖ At least 5 tested concentration plus control, 4 replicates for tested level, 5 daphnids for replicate.
- ❖ Duration: 48 h
- ❖ Validity criteria:
  - mortality in control  $\leq 10\%$
  - dissolved oxygen  $\geq 3$  mg/L in control and test vessel
- ❖ Considered observations: immobilisation ( $EC_{50}$ ).
- ❖ Analytical measurements mandatory (pH, oxygen, test substance)



## PHASE II A: EFFECT ASSESSMENT

### OECD 203 – Fish acute toxicity test

- ❖ At least 5 tested concentration plus control, 7 fish for tested level.
- ❖ Validity criteria:
  - mortality in control  $\leq 10\%$
  - constant conditions maintained
  - dissolved oxygen at least 60%
- ❖ Endpoint: mortality ( $LC_{50}$ )
- ❖ Analytical measurements mandatory (pH, oxygen, test substance)



## PHASE II A: EFFECT ASSESSMENT

### Sediments

$\log K_{oc}$  or  $\log K_{ow} \geq 3$  for an organic chemical: **trigger value for sediment effect assessment.**

$PNEC_{sed}$  for freshwater sediment-dwelling organisms derived on basis of the Phase IIA  $PNEC_{sed}$  for aquatic organisms and through Equilibrium Partitioning (EqP) concept

$$PNEC_{sed} = \frac{K_{susp-water}}{RHO_{susp}} \times PNEC_{surface\ water} \times 1000 \times CONV_{susp}$$

$K_{oc}$

Substance specific

## PHASE II A: EFFECT ASSESSMENT

# Invertebrates in marine environment

Study	Toxicity endpoint	AF	Remark
<b><i>Corophium volutator</i> (ISO 16712)</b>	10-d LC <sub>50</sub>	1,000	Recommended marine species
<b>Second marine/estuarine benthic species (Table 8)*</b>	10-d LC <sub>50</sub>	1,000	At least another taxonomic group than Crustacea is required in the data set
<b>Third benthic marine/estuarine or freshwater species (Table 8 and 9)*</b>	10-d LC <sub>50</sub>	1,000	At least another taxonomic group than Crustacea is required in the data set

\*If in the near future ISO and/or OECD guidelines for short-term toxicity tests with marine/estuarine benthic species become available, these protocol tests are preferred.

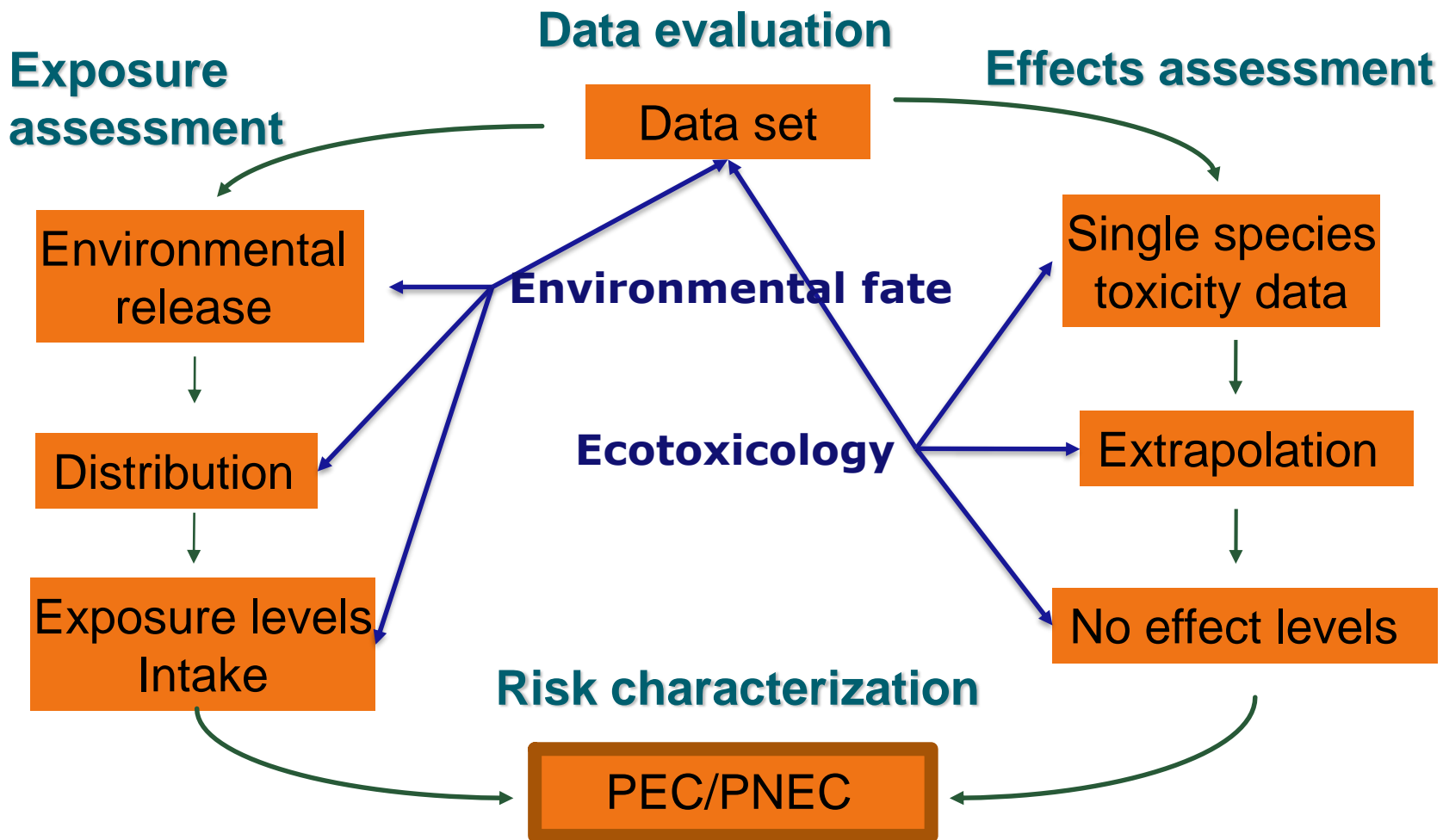


**10 days duration, 3 replicates**

**Validity criteria: control survival (mean) ≥ 85%**

**Endpoint: mortality (LC<sub>50</sub>)**

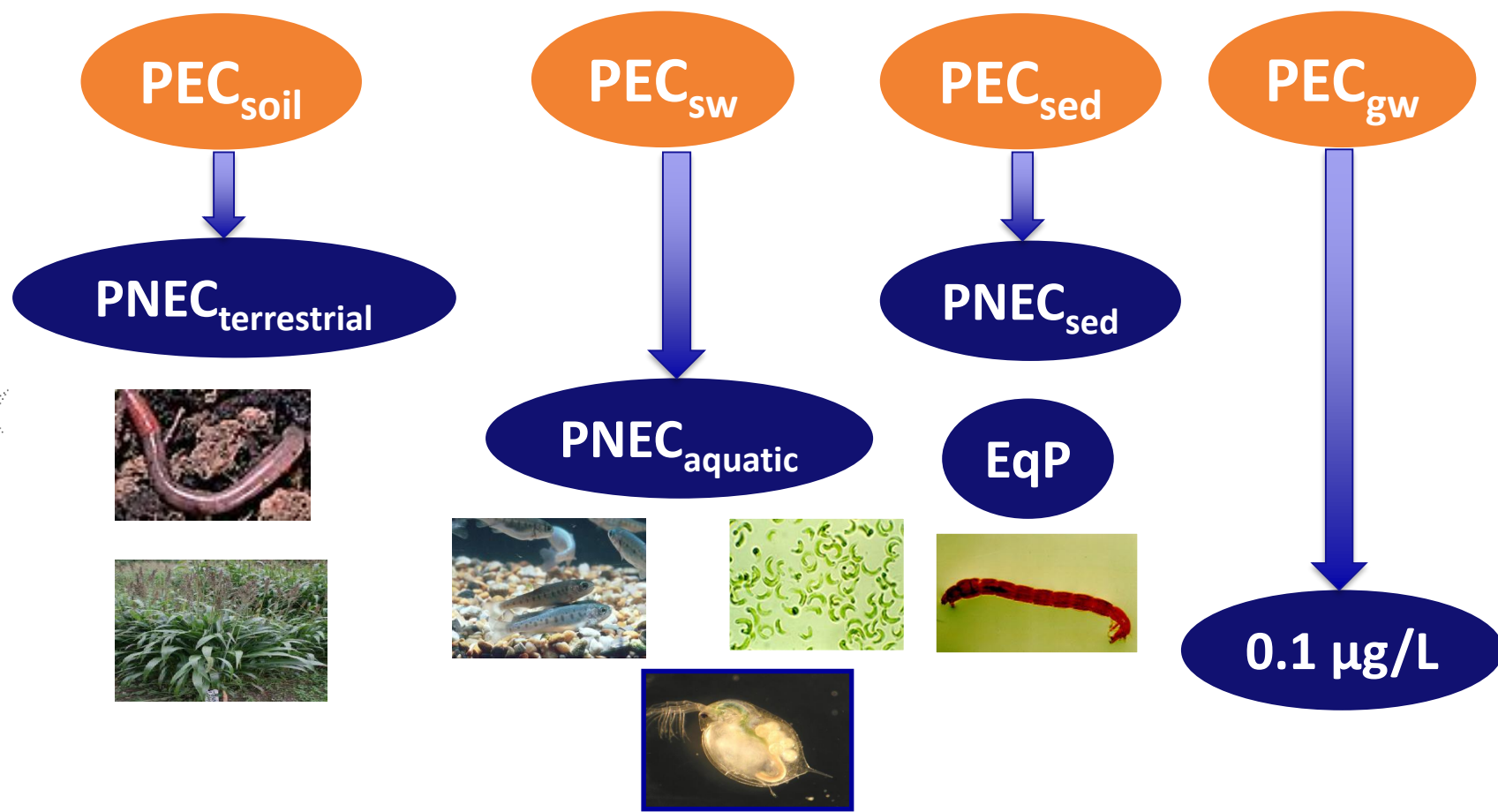
# ENVIRONMENTAL RISK ASSESSMENT





# WHICH PEC? WHICH PNEC?

## Terrestrial animals



# WHICH PEC? WHICH PNEC?



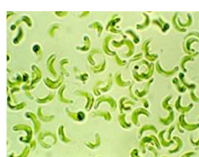
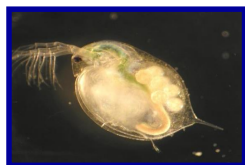
## Aquaculture

Land-based aquaculture

$PEC_{swaq}$



$PNEC_{aquatic}$



Sea cages

$PEC_{marine\ sed}$



$PNEC_{sed}$



## WHICH PEC? WHICH PNEC?

**Proper comparison between the  $PEC_{soil}$   
and /or  $PEC_{sed}$  and relative PNEC**



Correction for soil properties: the toxicity tests underlying the PNEC need to be normalised to the OC content used to derive the  $PEC_{soil}$

Correction for sediment OC content: properties the toxicity tests underlying the PNEC need to be normalised to the OC content of suspended solids used to derive the  $PEC_{sediment}$



## PHASE II A

# Risk assessment for secondary poisoning

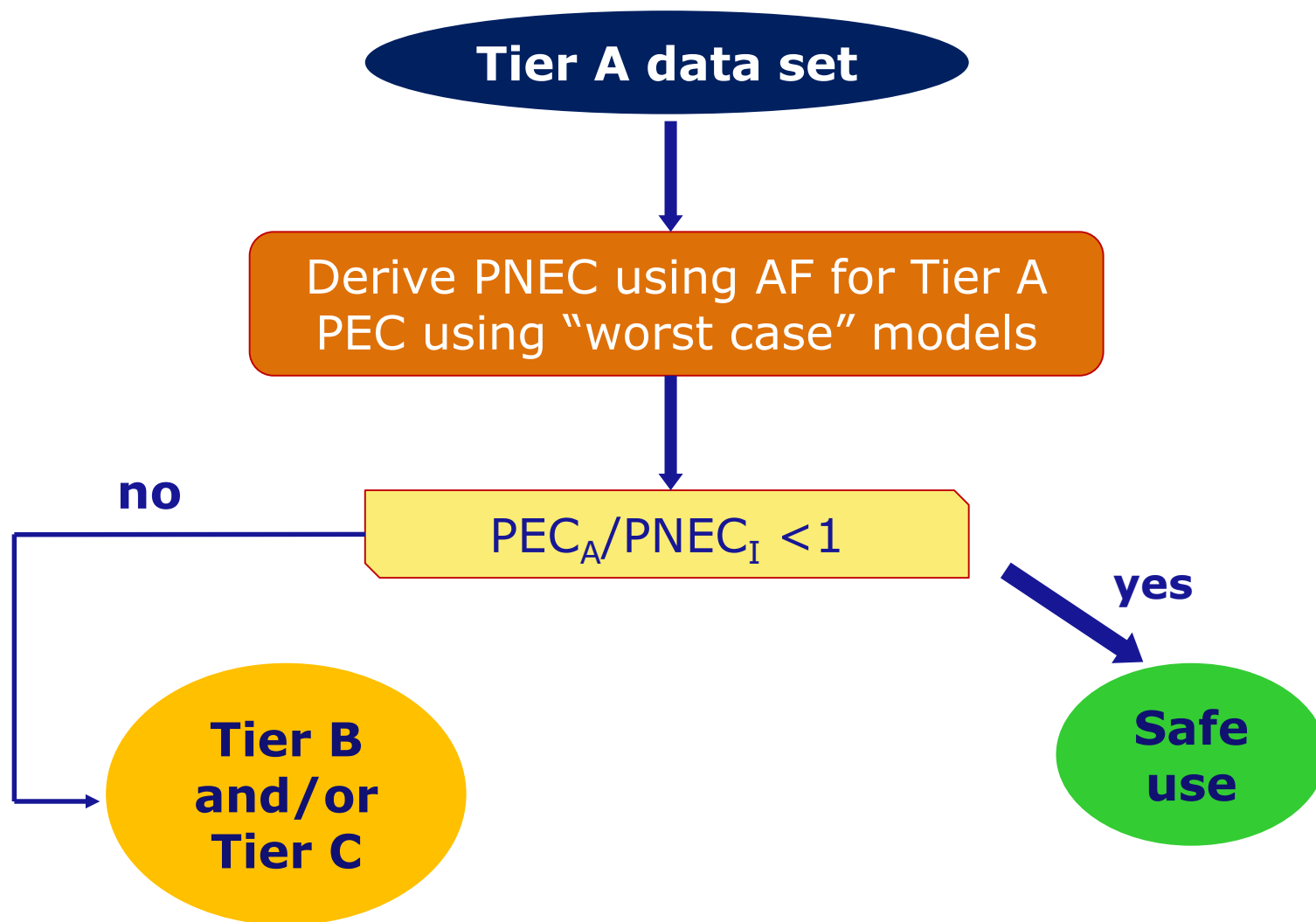
If a substance has a  $\log K_{ow} \geq 3$  the risk for secondary poisoning (food web transfer) has to be assessed.

QSAR evaluation for BCF

Guideline on environmental impact assessment for veterinary medicinal products in support of the VICH guidelines GL6 and GL38, Rev. 1



## PHASE II A: RISK CHARACTERISATION





## PHASE II B: EXPOSURE REFINEMENT

### **PEC<sub>B</sub> refinement for soil**

Refinement based on degradation in manure  
(EMA Guideline 2011)

PEC<sub>manure</sub> to be calculated for a storage time  
similar to one animal production cycle

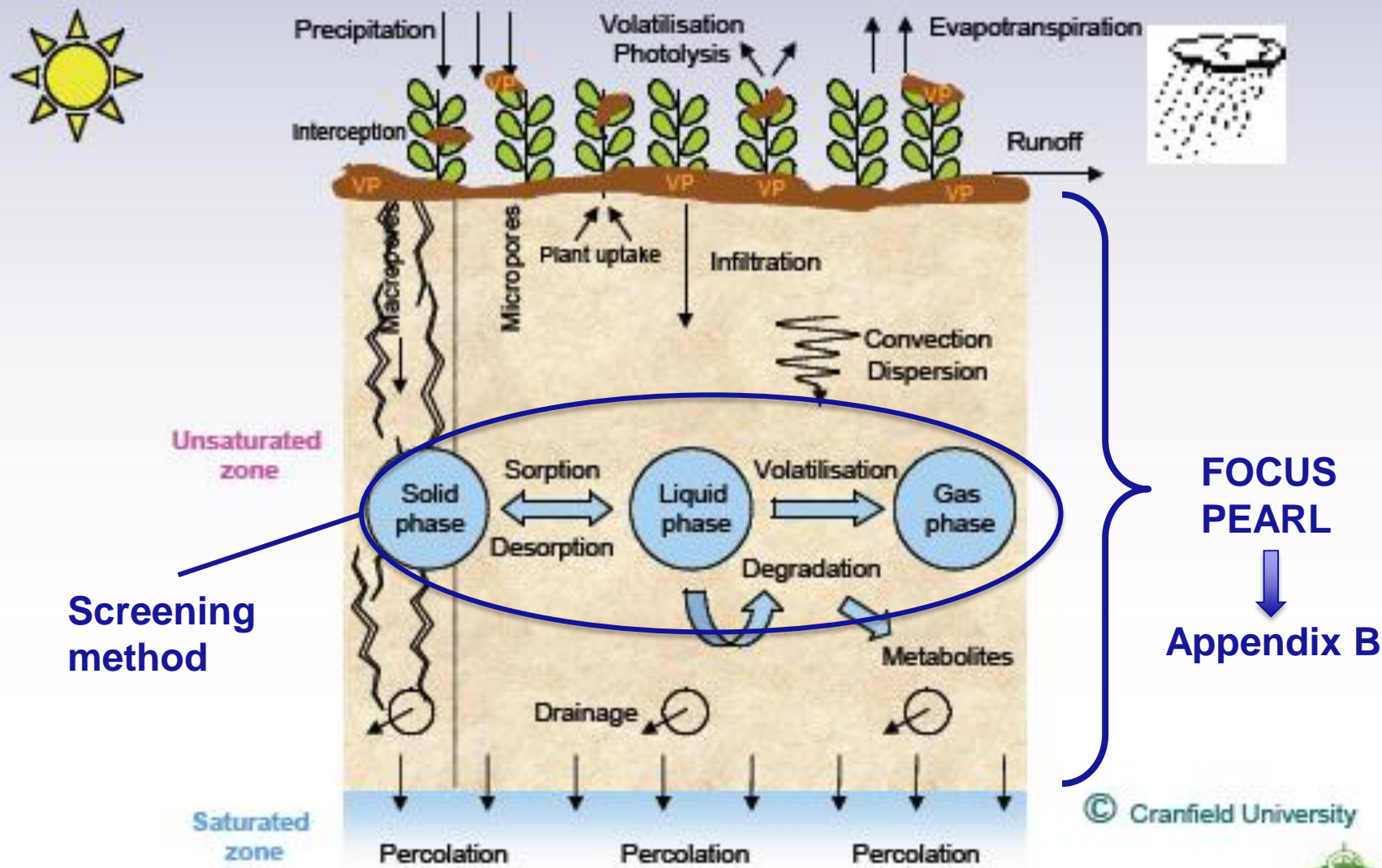
### **PEC<sub>B</sub> refinement for groundwater**

C <sub>FOCUS</sub> (µg L <sup>-1</sup> )	Requirement for the K <sub>OM</sub>
<0.001 - 0.01	K <sub>OM</sub> > -5.9 + 9.1 DT <sub>50</sub>
0.01 - <0.1	K <sub>OM</sub> > -5.9 + 6.5 DT <sub>50</sub>
≥0.1 – 1	K <sub>OM</sub> > -5.9 + 3.8 DT <sub>50</sub>
1 – 10	K <sub>OM</sub> > -5.9 + 1.2 DT <sub>50</sub>

### **Higher PEC<sub>B</sub> refinement for GW/SW**

FOCUS modelling

# Fate and transport processes in soil



© Cranfield University





# FOCUS GW

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## Ground Water

The FOCUS groundwater scenarios became available around 1 January 2001. They are used to assess the potential movement of active substances and metabolites of plant protection products to groundwater. They form a part of the review process for active substances in the EU in the context of Directive 91/414/EEC.

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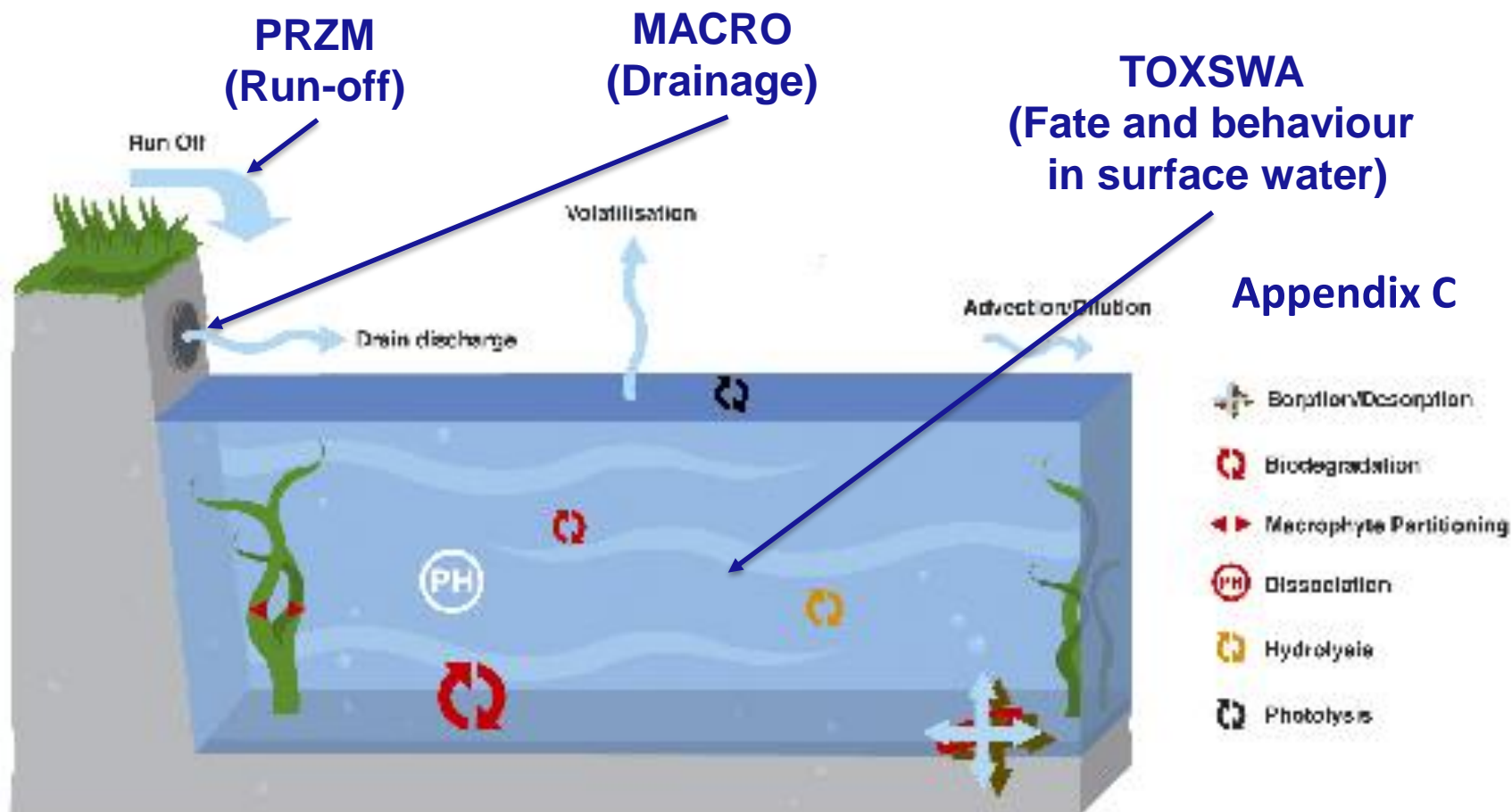
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## PHASE II B: EXPOSURE REFINEMENT

# FOCUS surface water models







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## Surface Water

Surface water is the second environmental compartment covered by the activities of FOCUS.

The possibilities of contamination of surface waters by the application of plant protection products (PPP) are already recognised for a long time. Main processes involved in the loading of surface waters with plant protection products are e.g. drift, drainage and run-off. The estimation of the concentration of the active substance of PPP is therefore required in the registration process in the European Union according to Directive 91/414/EEC.

The activities to determine the Predicted Environmental Concentration (PEC) in surface waters were distinguished into two parts. Firstly, the inventory of possible mathematical models suitable for this task and secondly, the development of a tiered approach to estimate these PECs for the benefit of the registration. The first part has been carried out from 1995 through 1996 and the second part from 1997 through 2002 (see Documentation of FOCUS Surface water).

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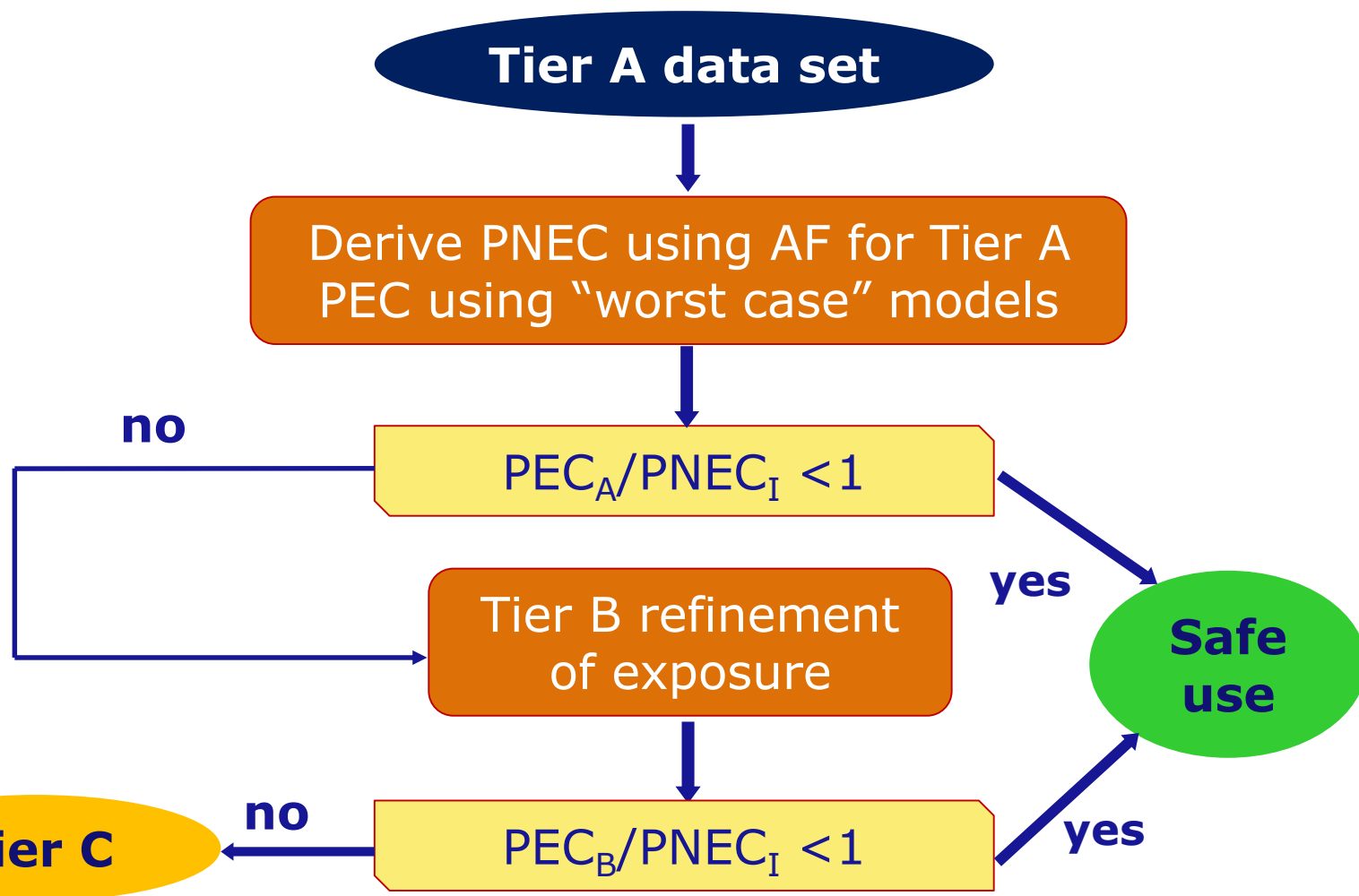
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## PHASE II C: EFFECT REFINEMENT



## PHASE II C: EFFECT REFINEMENT

### ERA – Chronic Toxicity Testing

Chronic – long-term lab studies

- ❖ Range of test concentrations (rates/doses) + control, maybe chosen by range finding or acute toxicity data, rarely done as limit tests
- ❖ Endpoints:  $EC_{10}$ /NOEC/LOEC based on survival, growth, development, reproduction (ecologically relevant parameters)



## PHASE II C: EFFECT REFINEMENT

### PNEC<sub>R</sub> derivation for s

Duration 56 days

EC<sub>10</sub>/NOEC

28 days (growth and *mortality*),

56 days reproduction

Study	Toxicity endpoint	AF	Remark
Terrestrial plants	14-21d EC <sub>10</sub> (or NOEC)	10	Most sensitive end point of all tested species
Earthworm subacute/reproduction OECD 220/222	56-d EC <sub>10</sub> (or NOEC)	10	
Collembolan reproduction test (OECD 232) or Predatory mite reproduction test (OECD 226)	28-d EC <sub>10</sub> (or NOEC) 14-d EC <sub>10</sub> (or NOEC)	10	not required if the EC <sub>10</sub> /NOEC of most sensitive plant is at least 10 times lower than that of the earthworm
Nitrogen Transformation (100 days)	≤25% of control	1	Exposure 1x and 10x PEC <sub>max</sub> Section 3.5.1.3

Same study of Phase IIA,  
different endpoint (EC<sub>10</sub>)

Same study of Phase IIA,  
longest period

Recommended  
*Hypoaspis aculeifer*  
14 days  
Mortality, reproduction  
(EC<sub>10</sub>/NOEC)

Recommended  
*Folsomia candida*  
28 days  
Mortality, reproduction  
(EC<sub>10</sub>/NOEC)

## PHASE II C: EFFECT REFINEMENT

# PNEC<sub>R</sub> derivation: fresh water compartment

Study	Toxicity endpoint	Remark
Algal growth inhibition <b>OECD 201</b>	72-96 h E <sub>r</sub> C <sub>10</sub> or NOE <sub>r</sub> C	E <sub>y</sub> C <sub>10</sub> or NOE <sub>y</sub> C may be used if E <sub>r</sub> C <sub>10</sub> or NOE <sub>r</sub> C not reported
Daphnia reproduction <b>OECD 211</b>	21-d EC <sub>10</sub> or NOEC	
Fish early life-cycle test <b>OECD 210</b>	EC <sub>10</sub> or NOEC	Duration of test dependent on test species

Same study of Phase IIA, different endpoint (E<sub>r</sub>C<sub>10</sub>)

Duration: 21 days  
Number of offspring per parent at the end of test (EC<sub>10</sub>/NOEC)

Duration: variable  
Success in hatching and survival; growth (length/weight) behaviour and development (EC<sub>10</sub>/NOEC)



## PHASE II C: EFFECT REFINEMENT

# PNEC<sub>R</sub> derivation: fresh water compartment

Available data	AF	Remark
One long-term EC <sub>10</sub> /NOEC algae	100	An AF of 100 to the EC <sub>10</sub> (NOEC) of the algae can only be applied if based on acute L(E)C <sub>50</sub> data there is evidence that algae are at least one order of magnitude more sensitive than <i>Daphnia</i> and fish.
Two long-term EC <sub>10</sub> /NOECs (algae and <i>Daphnia</i> or fish)	50	Species tested should cover the most sensitive from the acute data set (Section 3.3.6.2). The lowest value should be used to derive the PNEC
Three long-term EC <sub>10</sub> /NOECs	10	The lowest value should be used to derive the PNEC

## PHASE II C: EFFECT REFINEMENT

# **$PNEC_{R;sed}$ for freshwater sediment-dwelling organisms**

**EqP approach based on the PNEC for freshwater pelagic organisms revised based on the Phase IIC  $PNEC_{R;sw}$**

**When a risk is triggered**

**Experimental studies**

## PHASE II C: EFFECT REFINEMENT

# **PNEC<sub>R;sed</sub> for freshwater sediment-dwelling organisms**

Study	Toxicity endpoint	Remark
Sediment-Water Chironomid Toxicity Test	28-d EC <sub>10</sub> or NOEC	<u>OECD 218</u>
Sediment-Water Lumbriculus Toxicity Test	28-d EC <sub>10</sub> or NOEC	<u>OECD 225</u>
Chronic test with other benthic freshwater or marine/ estuarine species	EC <sub>10</sub> or NOEC	Table 19
Available data	AF	Remark
One long-term EC <sub>10</sub> /NOEC (Chironomus)	100	Sediment-Water Chironomid Toxicity Test currently is a data requirement
Two long-term EC <sub>10</sub> /NOEC (Chironomus and Lumbriculus)	50	-
Three long-term EC <sub>10</sub> /NOECs (Table 19 of the guidance)	10	Overview of freshwater and estuarine or marine benthic test species for which protocol tests are available

## PHASE II C: EFFECT REFINEMENT

# PNEC<sub>Rsed</sub> derivation: Marine compartment

Study	Toxicity endpoint	Remark
Marine/estuarine crustacean	EC <sub>10</sub> or NOEC	
Second marine/estuarine benthic invertebrate	EC <sub>10</sub> or NOEC	At least another taxonomic group than Crustacea is required in the data set
Third benthic marine/estuarine or freshwater invertebrate	EC <sub>10</sub> or NOEC	At least another taxonomic group than Crustacea is required in the data set

Available data	AF	Remark
One long-term EC <sub>10</sub> /NOEC	100	Species tested should cover the most sensitive species from the acute data set (Section 3.3.6.3)
Two long-term EC <sub>10</sub> /NOEC values (different taxonomic groups)	50	Species tested should cover the most sensitive species from the acute data set (Section 3.3.6.3).
Three long-term EC <sub>10</sub> /NOECs	10	Table 20

## PHASE II C: REFINEMENT

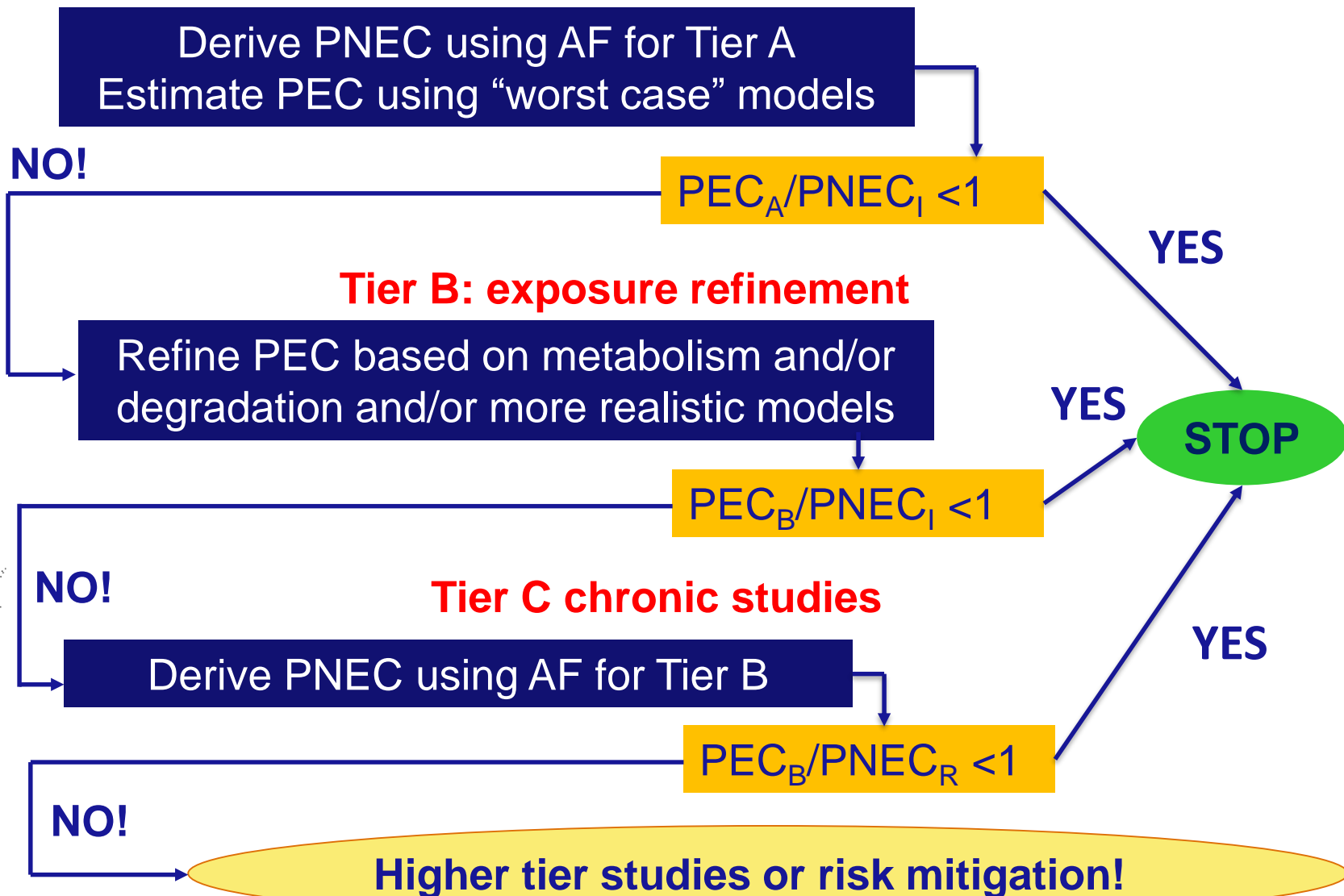
### **Risk assessment for secondary poisoning**

The QSAR estimate of the BCF value can be replaced by an experimental value determined in a study conducted according the OECD TG 305 to further refine the assessment of secondary poisoning when in phase IIB still a risk has been identified



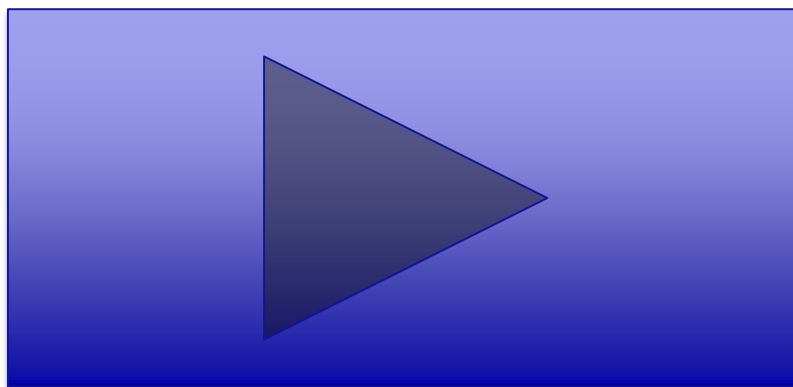


## PHASE II C: EFFECT REFINEMENT



## EXCEL TOOL

# Same model, same results





**THANK YOU FOR  
YOUR ATTENTION**



**ANY QUESTIONS,  
ASK GOOGLE**