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4 **Guideline on the assessment of persistent,**  
5 **bioaccumulative and toxic (PBT) or very persistent and**  
6 **very bioaccumulative (vPvB) substances in veterinary**  
7 **medicinal products**

8 Draft

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15	very bioaccumulative (vPvB) substances in veterinary	
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## 40 **Introduction**

41 Persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB)  
42 substances, are substances of very high concern because of their persistence, their ability to  
43 accumulate in living organisms and their toxicity. Due to the combination of these intrinsic  
44 properties, they can pose serious concerns for the environment.

45 The requirement to perform a PBT/vPvB screening for veterinary medicinal products (VMPs) is  
46 specified in the current CVMP guideline on 'Environmental impact assessment for veterinary  
47 medicinal products in support of the VICH guidelines GL6 and GL38'  
48 (EMA/CVMP/ERA/418282/2005-Rev.1). In the CVMP guideline it is stated that the cut-off values  
49 for each of these criteria (persistence, toxicity and bioaccumulation) are given in the EU technical  
50 guidance document (EU TGD, 2003) for industrial chemicals and biocides. However, no further  
51 guidance is given on how to perform a PBT assessment for VMPs. Moreover, the EU technical  
52 guidance document referred to is no longer in use and the legal framework under which it was  
53 written has been replaced by new legislation, in particular the new legislation on chemicals and  
54 supporting guidance (Regulation (EC) No 1907/2006 on the Registration, Evaluation, Authorisation  
55 and Restriction of Chemicals (REACH)).

56 Annex XIII of Regulation (EC) No 1907/2006 (as amended by Regulation (EC) 253/2011) lays  
57 down the criteria for the identification of PBT/vPvB substances, and together with the supporting  
58 technical guidance are used as a point of reference for the assessment of the PBT/vPvB of a  
59 substance/product within different legislative frameworks in the EU (e.g. for pesticides or  
60 biocides), and serve as harmonised criteria.

## 61 **Scope**

62 This guideline is intended to provide guidance on how PBT/vPvB substances are screened and  
63 assessed in accordance with Annex XIII of Regulation (EC) No 1907/2006 and its guideline  
64 documents (ECHA 2012a-d), with focus on the scientific data/information, parameters and default  
65 values that should be used for the assessment. This guideline has been developed taking into  
66 account, in particular, which scientific data/information is expected to be available for the VMPs for  
67 which a PBT/vPvB screening will be required.

68 This guideline also addresses general principles on how VMPs containing a substance that has been  
69 identified as PBT should be further assessed, within the context of the environmental risk  
70 assessment and benefit-risk assessment of the product concerned.

71

## 72 **PART 1. IDENTIFICATION OF PBT/VPVB SUBSTANCES**

### 73 **1. General considerations regarding the identification of** 74 **potential PBT or vPvB substances contained in VMPs**

75 PBT/vPvB substances are substances which will bioaccumulate in organisms and persist in the  
76 environment. Due to their physico-chemical characteristics, it is neither possible to predict the  
77 environmental fate of these substances nor the kind of adverse effects that could occur over long  
78 periods of time. The concern is that even if the emission of such a substance into the environment  
79 is stopped, this may not necessarily result in a reduced concentration of the substance in the  
80 environment and, subsequently, in biota. Chronic exposure and long term and cumulative adverse  
81 effects may lead to uncertainty when calculating the predicted environmental concentration (PEC)  
82 via established exposure models, and/or establishing the predicted no effect level (PNEC) from  
83 standard laboratory tests.

84 Within the authorisation procedure for VMPs, an environmental risk assessment (ERA) is required  
85 to assess the potential for VMPs to affect non-target species in the environment, including both  
86 aquatic and terrestrial species.

87 The ERA is performed according to the VICH (International Cooperation on Harmonisation of  
88 Technical Requirements for Registration of Veterinary Medicinal Products) guideline GL 6:  
89 Environmental impact assessment (EIAs) for veterinary medicinal products (VMPs) – Phase I  
90 (CVMP/VICH/592/1998), (VICH 2000), the CVMP/VICH guideline GL 38 on environmental impact  
91 assessment for veterinary medicinal products - Phase II (CVMP/VICH/790/03-FINAL) (CVMP/VICH  
92 2005), and the guideline on environmental impact assessment for veterinary medicinal products in  
93 support of the VICH guidelines GL6 and GL38 (EMA/CVMP/ERA/418282/2005-Rev.1) (CVMP  
94 2008).

95 The ERA is based on the accepted principle that risk is a product of the exposure, fate and effects  
96 assessments of the VMP for the environmental compartments of concern. The Phase II ERA is  
97 based on a RQ approach, which is the ratio of the predicted environmental concentration (PEC)  
98 and the predicted no effect concentration (PNEC) on non-target organisms. The RQ (PEC/PNEC) is  
99 compared against a value of 1, and a value less than 1 indicates that no further testing is  
100 recommended. If this assessment results in a possible risk to the environment ( $RQ > 1$ ), several  
101 steps can be taken to refine the risk assessment. If an unacceptable risk is identified at the end of  
102 the assessment, appropriate mitigation measures should be proposed in order to reduce the risk to  
103 an acceptable level.

104 For the assessment of PBT/vPvB, it is very difficult to predict fate and environmental  
105 concentrations, and thus bioaccumulation and effects of PBT/vPvB substance in the environment.  
106 Therefore, in addition to the required quantitative environmental risk assessment as describe  
107 above, it is also necessary to conduct a hazard based PBT/vPvB assessment which focuses on  
108 intrinsic properties of substances only.

109 Annex XIII of the REACH regulation (Regulation (EC) No 1907/2006) lays down the criteria for the  
110 identification of PBT and vPvB substances. To ensure a harmonised approach, these criteria  
111 together with the methodology in the current REACH guidance on PBT-assessment (Guidance on  
112 information requirements and chemical safety assessment Chapter R.11: PBT Assessment and

113 Chapters R7.a, 7.b, and R7.c on endpoints specific guidance) should be followed. The REACH  
114 guidance documents can be obtained from the ECHA website<sup>1</sup>.

## 115 **1.2. Identification of PBT/vPvB properties**

116 The CVMP guideline in support of the VICH guidelines (EMA/CVMP/ERA/418282/2005-Rev.1),  
117 introduces the concept of screening individual substances for PBT properties. As the Phase I  
118 assessment does not require any specific environmental data the PBT screening can only be  
119 conducted as part of the Phase II assessment. However, there are provisions as set out as in the  
120 last paragraph of the introduction of VICH GL 6, that allows further assessment of environmental  
121 risk if there are particular concerns over the activity and use of the product or active substance  
122 (the so called 'however clause'). Therefore, where a competent authority has evidence, or strong  
123 suspicion that an active substance of a product that would otherwise stop in phase I potentially  
124 has PBT/vPvB properties, a PBT/vPvB assessment could be required. For example this could be the  
125 case for substances with a valid octanol/water coefficient  $K_{ow} \geq 4$  or that has been assessed as  
126 PBT/vPvB in other regulatory frameworks. A PBT/vPvB assessment should not be requested for  
127 products for non-food producing species, for products containing natural substances, or if the  
128 substance is shown to be extensively metabolized in the animal, as defined in the Phase I decision  
129 tree.

130 The objective of the PBT/vPvB assessment is to determine if the substance fulfills the criteria  
131 (specified in REACH Annex XIII) for persistence, bioaccumulation and toxicity. As a starting point  
132 the assessment will be based on all the relevant data available, regardless of the compartment in  
133 which they have been derived.

134 As the emission to the environment will be different for VMPs for use in terrestrial animals and  
135 those for use in aquaculture, a differentiation is made in the assessment strategy.

136 Table 1 provides an overview of the criteria for the identification of PBT or vPvB substances, as  
137 outlined in Annex XIII of Regulation (EC) 1907/2006. As explained in the relevant REACH guidance  
138 (ECHA, 2012d), two sets of criteria exist, one for PBT substances and a second for vPvB  
139 substances. The second set was developed with the understanding that for substances that are  
140 very persistent and very bioaccumulative, high but unpredictable levels may be reached in wildlife  
141 and/or humans over extended time periods. For such substances, it is not necessary to  
142 demonstrate toxicity in laboratory testing as long-term effects can be anticipated.

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<sup>1</sup> <http://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment>

**Table 1: PBT and vPvB criteria (taken from table R. 11-1 in ECHA (2012d): Guidance on information requirements and chemical safety assessment Chapter R.11: PBT Assessment).**

Property	PBT-criteria	vPvB-criteria
<p><b>Persistence</b> The assessment of the persistency in the environment shall be based on available half-life data collected under the adequate conditions, which shall be described by the registrant.</p>	<ul style="list-style-type: none"> <li>- <math>T_{1/2}^* &gt; 60</math> days in marine water, or</li> <li>- <math>T_{1/2} &gt; 40</math> days in fresh- or estuarine water, or</li> <li>- <math>T_{1/2} &gt; 180</math> days in marine sediment, or</li> <li>- <math>T_{1/2} &gt; 120</math> days in fresh- or estuarine sediment, or</li> <li>- <math>T_{1/2} &gt; 120</math> days in soil.</li> </ul>	<ul style="list-style-type: none"> <li>- <math>T_{1/2} &gt; 60</math> days in marine, fresh- or estuarine water, or</li> <li>- <math>T_{1/2} &gt; 180</math> days in marine, fresh- or estuarine sediment, or</li> <li>- <math>T_{1/2} &gt; 180</math> days in soil.</li> </ul>
<p><b>Bioaccumulation</b> The assessment of bioaccumulation shall be based on measured data on bioconcentration in aquatic species. Data from freshwater as well as marine water species can be used.</p>	BCF > 2000 L/kg	BCF > 5000 L/kg
<p><b>Toxicity</b></p>	<ul style="list-style-type: none"> <li>- NOEC/EC<sub>10</sub> (long-term) &lt;0.01mg/L for marine or freshwater organisms, or substance meets the criteria for classification as carcinogenic (category 1A<sup>2</sup> or 1B<sup>3</sup>), germ cell mutagenic (category 1 or 1B), or toxic for reproduction (category 1A<sup>4</sup>, 1B<sup>5</sup> or 2<sup>6</sup>) according to Regulation EC No 1272/2008** or there is other evidence of chronic toxicity, as identified by the substance meeting the criteria for classification: specific target organ toxicity after repeated exposure (STOT RE category 1 or 2) according to Regulation EC No 1272/2008.</li> </ul>	Not applicable

\* $T_{1/2}$  is the degradation half-life.

\*\* Regulation on classification, labelling and packaging (CLP-Regulation (EC) No 1272/2008)

<sup>2</sup> Substances known to have carcinogenic potential for humans (epidemiological and/or animal data)

<sup>3</sup> Substances presumed to have carcinogenic potential for humans (animal studies)

<sup>4</sup> Known human reproductive toxicant (human evidence)

<sup>5</sup> Presumed human reproductive toxicant (animal studies)

<sup>6</sup> Suspected human reproductive toxicant (some evidence from humans or experimental animals, not sufficiently convincing to place the substance in category 1)

146 **1.2.1. Persistence**

147 **1.2.1.1. Assessment of persistence in the soil compartment**

148 The persistence of a substance is a key parameter to predict the potential for long-term exposure  
149 of organisms, as well as the potential for the substance to reach the aquatic environments and to  
150 be transported to distant geographical areas. It is expected that VMPs for use in terrestrial species  
151 will primarily enter the environment via spreading of manure onto agricultural land, or via direct  
152 excretion by animals on pasture. The VICH GL 38 requires an aerobic and anaerobic  
153 transformation study in soil (according to OECD guideline 307), to investigate the rate of  
154 degradation of the active substance(s) and all relevant transformation products. Persistent  
155 substances can also reach the water phase by run off or direct entry. Therefore, if besides ERA  
156 Phase II typical tier A studies on degradation studies on soil, additional information on degradation  
157 half-lives for sediment or total water/sediment system are available in the dossier, these are also  
158 relevant for PBT assessment of VMPs for use in terrestrial species. In line with REACH Annex XIII,  
159 the P criterion is considered to be fulfilled if it is met for any of the compartments (soil, sediment,  
160 water or total water/sediment system).

161 Persistence studies should reflect environmental temperatures in Europe and therefore preferably  
162 be conducted at 12°C, as this is the temperature established as the average EU outdoor  
163 temperature according to the EC technical guidance document on risk assessment (EC, 2003). If  
164 studies are conducted at different temperatures, extrapolation of degradation half-lives to 12°C  
165 should be considered.

166 The following Arrhenius equation can be used to extrapolate the degradation half-life from e.g.  
167 20°C to 12°C:

168

$$169 \quad DT_{50T1} = DT_{50T2} \exp \left( \frac{E_a}{R} \left( \frac{1}{T_1} - \frac{1}{T_2} \right) \right)$$

170

171 Where  $DT_{50T1}$  and  $DT_{50T2}$  are the half-lives at temperatures  $T_1$  and  $T_2$ , respectively,  $E_a$  is  
172 activation energy ( $\text{kJ mol}^{-1}$ ) and  $R$  is the gas constant ( $0.008314 \text{ kJ K}^{-1} \text{ mol}^{-1}$ ). As long as no  
173 specific guidance on default values is given in the REACH guidance, the default value for  $E_a$   
174 (activation energy) should be  $65.4 \text{ kJ/mol}^7$ , as specified in the EFSA guidance for use in FOCUS  
175 (EFSA, 2007).

176 To determine degradation rates (instead of dissipation rates) the formation of bound residues  
177 should not be confused with degradation. Degradation studies should be preferably performed with  
178 radio-labelled compounds and using the best possible extraction methods, although it could be  
179 possible to produce acceptable degradation data using an unlabelled test substance. The highest  
180 degradation half-life from the OECD 307 test should be used for the PBT assessment, until further  
181 guidance on evaluation of simulation test data on biodegradation is provided by REACH.

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<sup>7</sup> This value is the latest revised value and should be used instead of the one recommended value in the 'CVMP/VICH revised Guideline on Environmental Impact Assessment for Veterinary Medicinal Products in support of the VICH Guidelines 6 and 38' of  $68.9 \text{ kJ mol}^{-1}$ .

### 182 **1.2.1.2. Assessment of persistence in the aquatic compartment**

183 For VMPs that are intended for use in aquaculture, persistence in the water/sediment system is  
184 considered most relevant. The VICH GL 38 requires an aerobic and anaerobic transformation study  
185 in aquatic sediment systems (according to OECD guideline 308), to investigate behaviour and  
186 degradation rate of the active substance(s) and all relevant transformation products that are used  
187 in aquaculture systems. The water/sediment simulation studies will provide half-lives in the water  
188 phase, the sediment phase and in the total system.

189 For most persistent substances, removal from the aqueous phase is determined by dissipation due  
190 to partitioning to sediment rather than by true degradation. For this reason, degradation half-lives  
191 for the total system and sediment are considered most relevant to determine the degradation half-  
192 life of a substance in the aquatic environment. Thus, half-lives in water only should not be used for  
193 the assessment of persistence. However, the P criterion is considered to be fulfilled if it is met for  
194 any of the compartments (sediment, water or whole system).

195 A temperature extrapolation to the average EU outdoor temperature of 12°C should be applied for  
196 surface water and sediment, in a similar way to the soil compartment (see section 2.1.1). For  
197 marine water, an extrapolation to 9°C should be applied.

198 For VMPs used in the marine environment, the VICH GL 38 recommends carrying out the  
199 degradation study for the aquatic system under saltwater conditions (for instance according to  
200 OECD GL 308), including all aspects as mentioned above for freshwater.

### 201 **1.2.2. Bioaccumulation**

202 In accordance with the VICH guidance a  $\log K_{ow} \geq 4$  is used as a criterion for an assessment of  
203 bioaccumulation. When this criterion is met, evidence from metabolism/residues/excretion studies  
204 and molecular mass should be considered to see whether there is the potential for bioaccumulation  
205 to occur. If a potential for bioaccumulation is established, or if there is not sufficient data to  
206 conclude that the substance will not bioaccumulate, then a bioaccumulation study in fish (in  
207 accordance with OECD guideline 305) should be performed. However, it should be noted that a  
208 lack of accumulation in mammals does not automatically exclude a potential for accumulation in  
209 fish and other aquatic species. Reasons for this are decreased activity of enzymes involved in the  
210 transformation of xenobiotics in fish and/or lower trophic levels and other factors such as different  
211 exposure routes (e.g. via gills), differences in metabolism, different excretion routes, etc.

212 For comparison with the B and vB criteria, the measured BCF value(s) should be normalised to 5%  
213 lipid content as recommended by the OECD GL 305 and REACH, including a correction for growth  
214 dilution.

### 215 **1.2.3. Toxicity**

216 For animal welfare reasons it is recommended that the evaluation of persistence and  
217 bioaccumulation is carried out first. When the criteria for persistence and/or bioaccumulation are  
218 not met, there is no requirement to carry out evaluation of the T criterion.

219 A substance is considered to potentially meet the criteria for T when an acute E(L)C50 value from  
220 a standard (acute *Daphnia* and fish studies) E(L)C50 toxicity test is less than 0.1 mg/l. The T  
221 criterion for PBT assessment cannot be concluded on the basis of acute studies alone. If the above

222 criteria is met (screening criterion), the substance is referred to definitive T testing and chronic  
223 studies are required to confirm that the substance is indeed T (unless the E(L)C50 < 0.01 mg/l,  
224 when the substance can be concluded to be T). Normally, and for welfare considerations, the  
225 testing order for conclusion on T based on chronic data is Daphnia and then fish. If the T-criterion  
226 is fulfilled (Table 1) by the chronic algae or *Daphnia* data, a chronic fish test is not necessary. If  
227 further aquatic toxicity other than the available studies is considered necessary to conclude on the  
228 T criteria, and if there are indications that representative species from one taxonomic group are  
229 more sensitive than species from other taxonomic groups, this sensitive group should be chosen  
230 for chronic testing.

231 It can be assumed that for VMPs for which a Phase II assessment is necessary, information on  
232 carcinogenicity, mutagenicity, reproductive and chronic toxicity for mammals is available in other  
233 parts of the dossier. This information can also be found in MRL summary report.

234

## 235 **PART 2. ASSESSMENT OF PRODUCTS CONTAINING A PBT** 236 **SUBSTANCE**

237 vPvB substances are resistant to environmental degradation and consequently they have been  
238 known to persist in the environment, transport long distances, bioaccumulate in human and in  
239 animal tissue, and bioconcentrate. Thus, given the potential significant impacts on human health  
240 and the environment it seems unlikely that an authorisation for a vPvB substance in a veterinary  
241 medicinal product where the substance will be released to the environment could be granted.  
242 Therefore, Part II of this guideline is based on the assessment of VMPs containing PBT substances  
243 only, with no reference to vPvBs.

### 244 **2.1. Emission assessment**

245 The terms persistent, bioaccumulative and toxic (PBT) refer to substances of very high concern for  
246 the environment because of their persistence, their ability to accumulate in living organisms and  
247 their toxicity. Carrying out an environmental risk assessment for veterinary medicinal products  
248 containing (potential) PBT substances poses challenges in relation to the technical methodology,  
249 for the emission as well as the effects assessment. A long term and cumulative adverse effects  
250 lead to uncertainty when calculating environmental concentration (PEC) via established exposure  
251 models and/or establishing the predicted no effect level (PNEC) from standard laboratory tests.  
252 Hence, the standard approach where a risk is characterised calculating the PEC/PNEC ratio to  
253 determine the risk quotient, is not well suited for products containing a substance with PBT  
254 properties.

255 For such products the risk characterisation will be different because of the intrinsic properties of a  
256 PBT substance, and the actual or expected emission scenarios. It will be necessary to consider  
257 knowledge on the aspects of the specific product and its use that contribute to the actual emission  
258 in the environment, e.g. application route (injection/oral/topical treatment), husbandry conditions  
259 (indoor/outdoor/confined), terrestrial/aquaculture, closed/open water systems, individual animal  
260 treatment/flock treatment, confinement of the VMP during use, control of environmental release,  
261 waste management, metabolism in the target animal, etc.

262 An applicant for a product containing a PBT substance should explore all possibilities regarding  
263 emissions of the product in order to allow for a tailor-made assessment of the PBT- containing  
264 product. All relevant exposure scenario(s) should be used to obtain emission estimations.  
265 Calculations of the (maximum) entry load or emission into the environment should be made  
266 initially followed by more refined calculations, if necessary, and where suitable data are available.  
267 Robust metabolism data from the dossier could be used to refine the environmental emission  
268 scenarios, e.g. if the PBT substance is extensively metabolised (see definition in VICH guideline  
269 GL6) or if metabolites can be shown to no longer fulfil the PBT criteria.

270 Documented knowledge of the product and its potential uses could allow refinement of scenarios,  
271 e.g. if certain default values are clearly out of scope for the specific VMP (refer to VICH GL 6),

272 Where experimental data are available, in general these data should take precedence over models  
273 and predictions.

274 Generally, the risk characterisation for the environment considers predicted or actual emissions to  
275 estimate the incidence or severity of potential adverse effects likely to occur in environmental

276 compartments. Given that characterising the risk to specific environmental compartments by  
277 deriving the PEC/PNEC ratio is not possible for PBT substances, a qualitative evaluation of the  
278 likelihood that an effect is occurring under specific conditions of exposure or will occur under the  
279 expected conditions of exposure is then needed. Therefore, if the release is controlled and the  
280 environmental compartment is not exposed, the PBT assessment can stop here. If concerns  
281 remain, further information/testing (e.g., other knowledge of the substance/ product concerned,  
282 e.g. any knowledge about pharmacokinetics or metabolism of the active substance known from  
283 other parts of the dossier, should be taken into consideration to come to more firm conclusions  
284 regarding the true ability for persistence or bioaccumulation) may be needed to refine the  
285 classification of the substance, or determine additional risk mitigation measures that would  
286 effectively lower environmental exposure.

287 The outcome of the assessment emission scenario should clarify the potential for an environmental  
288 impact, the need for further studies where indispensable data are missing or inconclusive, and the  
289 need for risk management measures for the product.

## 290 **2.2. Risk Management**

291 PBT substances pose concerns in the environment due to their intrinsic problematic properties.  
292 However, in veterinary medicine some pathogens are difficult to treat, and long-lasting, toxic  
293 compounds may be necessary to combat the disease for the animal. Therefore, competent  
294 authorities should not base their risk management decisions solely on hazard based PBT  
295 classification, but explore all available knowledge.

296 The purpose of risk management is to control and limit the environmental emission as much as  
297 possible for PBT substances, for example by limiting certain uses of the product, using different  
298 application methods, by setting appropriate risk mitigation measures and by communicating the  
299 hazard clearly to the end users. The Applicant must justify the benefits of the products in relation  
300 to the risks, and the control of these risks.

### 301 **2.2.1. Risk mitigation measures**

302 Adverse effects on the environment from PBT substances should be prevented through the  
303 application of appropriate risk mitigation measures to ensure that any risks from the uses of a  
304 substance are adequately controlled, and with a view to progressively substituting these  
305 substances with a suitable safer substance, where feasible. For any substance fulfilling the P, B  
306 and T criteria, measures should always be taken to minimise, as far as technically and practically  
307 possible, emissions with a view to minimising the likelihood of adverse effects. Measures to ensure  
308 adequate control should be clearly described in the SPC and product literature when relevant, and  
309 in the conditions to the marketing authorisation, e.g. as Risk Management plans, periodic review  
310 or specific post-authorisation monitoring.

311 While it is recognised that for PBT substances it will be difficult to assess appropriate risk  
312 mitigation measures, as the emission quantification is difficult, effective risk mitigation measures  
313 should be explored that minimise release into the environment.

314 Targeted sampling / post-marketing monitoring in the environment following treatment in risk  
315 management plans could be envisaged to allow measurement of effectiveness of risk mitigation  
316 measures. However, experience with this is limited at present.

317 Each product must be evaluated according to its intended use, and all options for reduction of  
318 environmental release of the PBT substance must be used. This could be limitations in use of the  
319 product, for example:

- 320 • treatment only by injection, to avoid spillage or run-off
- 321 • treatment only while animals are in the stable, to avoid direct emission to the environment
- 322 • avoid the animals' access to water ponds or streams for a specified period after treatment,  
323 where excretion is high
- 324 • use only in small water tanks where waste water can be collected and safely managed,  
325 etc.

326 Such limitations should be based on robust justifications and data to ensure the effectiveness of  
327 the environmental protection.

### 328 **2.3. Risk communication in SPC and labelling**

329 For products containing PBT substances, information on bioaccumulation, persistence and  
330 degradability must be given in the SPC and leaflet, where available and appropriate. Information  
331 should also be provided for hazardous transformation products arising from the degradation of  
332 substances, if relevant. The information shall be consistent with the information provided in the  
333 dossier.

334 Where environmental risks have been identified, information on toxicity using data from tests  
335 performed on aquatic and/or terrestrial organisms must be provided, where relevant. This includes  
336 relevant available data on aquatic toxicity, both acute and chronic for fish, crustaceans, algae and  
337 other aquatic plants. In addition, toxicity data on soil micro- and macro-organisms and other  
338 environmentally relevant organisms, such as birds, bees and plants must be included, where  
339 relevant. This information must be reflected in the package leaflet so the end user can respect the  
340 risk mitigation measures adequately.

341 The octanol-water partition coefficient ( $K_{ow}$ ) and bioconcentration factor (BCF) of the substance  
342 should be included in the SPC, if available.

343 The SPC and leaflet text must be clear on the environmental risks, in particular specifying under  
344 which conditions the risk is a particular problem and what the consequences may be. The text  
345 must also explain if there are unknown scenarios, which may confer additional risks and therefore  
346 should be avoided, if relevant.

### 347 **2.4. Benefit-Risk considerations**

348 A PBT screening should not be understood as an automatic non-ability to authorise a VMP, as it  
349 constitutes a screening, particularly if based only on a minimum set of data.

350 For a product containing a PBT substance, an authorisation should only be granted if it is shown  
351 that the risks can be adequately controlled, or if the therapeutic benefits outweigh the risks to  
352 human and animal health and the environment arising from the use of the substance, and if there  
353 are no suitable alternative substances or technologies. This decision should only be taken after  
354 consideration of all of the following elements and taking into account all available knowledge:

355 (a) the hazard posed by the uses of the substance, including the appropriateness and effectiveness  
356 of the risk management measures proposed;

357 (b) the therapeutic benefits arising from its use and the implications of a refusal to authorise as  
358 demonstrated by the applicant or other interested parties;

359 (c) the analysis of the alternatives or any possibility to substitute the substance, as provided by  
360 the applicant or other interested parties;

361 (d) available information on the risks to human health or the environment of any alternative  
362 substances or technologies.

363 Furthermore, marketing authorisations could be subject to conditions, e.g. a Risk Management  
364 Plan (RMP) with time-limited review whose periods would be determined on a case-by-case basis,  
365 specific monitoring and specific pharmacovigilance requirements. The RMP could include targeted  
366 sampling and/or post-marketing monitoring in the environment following use/treatment to obtain  
367 a better understanding of the actual environmental exposure.

368 The final benefit-risk evaluation must take into account all available data from quality, safety and  
369 efficacy to ensure that the expected benefits outweigh the potential risks of the product.

370

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## 423 List of abbreviations

424	B criterion:	Bioaccumulative criterion
425	BCF:	Bioconcentration Factor
426	CLP:	Regulation on Classification, Labelling and Packaging
427	CVMP:	Committee for Medicinal Products for Veterinary Use
428	DT <sub>50T1</sub> :	Degradation half-lives at temperatures T <sub>1</sub>
429	DT <sub>50T2</sub> :	Degradation half-lives at temperatures T <sub>2</sub>
430	E <sub>a</sub> :	Activation energy (kJ mol <sup>-1</sup> )
431	EC:	European Commission
432	EC <sub>50</sub> ; EC <sub>(X)</sub> :	The concentration of a test substance which results in 50% (X%) of the test animals
433		being adversely affected, i.e., both mortality and sub-lethal effects
434	ECHA:	European Chemicals Agency
435	EFSA:	European Food Safety Authority
436	EIA:	Environmental impact assessment
437	EMA:	European Medicines Agency
438	EMEA:	Old acronym for European Medicines Agency (replaced by EMA)
439	ERA:	Environmental risk assessment
440	EU:	European Union
441	EU TGD:	European Union technical guidance document
442	FOCUS:	Forum for the co-ordination of pesticide fate models and their use
443	exp:	Exponential function
444	GL:	Guideline
445	K <sub>ow</sub> :	Octanol-water partition coefficient
446	LC <sub>50</sub> :	The concentration of a test substance which results in a 50% mortality of the test
447		species.
448	NOEC:	No Observed Effect Concentration
449	OECD:	Organisation for Economic Co-operation and Development
450	P criterion:	Persistent criterion
451	PBT:	Persistent Bioaccumulative Toxic (chemical)
452	R:	Gas constant (0.008314 kJ K <sup>-1</sup> mol <sup>-1</sup> )
453	REACH:	Registration, Evaluation, Authorisation and Restriction of Chemicals
454	STOT RE:	Specific Target Organ Toxicity after Repeated Exposure
455	T criterion:	Toxicity criterion

456	T <sub>1</sub> :	Temperature 1
457	T <sub>1/2</sub> :	Degradation half-life
458	T <sub>2</sub> :	Temperature 2
459	VICH:	International Cooperation on Harmonisation of Technical Requirements for
460		Registration of Veterinary Medicinal Products
461	VMP:	Veterinary medicinal product
462	vPvB:	Very persistent and very bioaccumulative