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4 **Guideline on the environmental risk assessment of**
5 **medicinal products for human use**
6 **Draft**

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7
8 This guideline replaces 'Guideline on the environmental risk assessment of medicinal products for
9 human use (EMEA/CHMP/SWP/4447/00 corr 2)'.

10 Comments should be provided using this [template](#). The completed comments form should be sent to
11 ERA_DG@ema.europa.eu

12 **Keywords** *Environmental risk assessment, ERA, Human medicinal products, PBT*



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14 **medicinal products for human use**

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56 **Executive summary**

57 The purpose of this guideline is to describe the assessment of the potential environmental risks and
58 hazards of human medicinal products (HMP). It specifies the scope and legal basis for assessment. It
59 outlines general considerations and the recommended step-wise procedure of assessment. The general
60 outline of the Environmental Risk Assessment Report is included, and for products for which risks
61 cannot be excluded, this guideline outlines the possible precautionary and safety measures.

62 **1. Introduction (background)**

63 It is mandatory for the dossier for the marketing authorisation of HMP to include an environmental risk
64 assessment (ERA). This ERA is based on the use of the product and the physico-chemical,
65 ecotoxicological, and fate properties of its active substance. This guideline describes how to perform
66 this ERA and how to evaluate potential risks to the environment arising from the use of the medicinal
67 product, with the aim of protecting aquatic and terrestrial ecosystems including surface water,
68 groundwater, soil and secondary poisoning - and the microbial community in sewage treatment plants.
69 Furthermore, the identification of potential hazards of the active substance of a medicinal product is
70 described. The guideline also includes consideration of potential precautionary and risk mitigation
71 measures, and provides guidance on how to report the findings in an Environmental Risk Assessment
72 Report.

73 **2. Scope and legal basis**

74 In accordance with Article 8(3) of Directive 2001/83/EC, as amended, the evaluation of the potential
75 environmental risks posed by the use of medicinal products shall be submitted, their environmental
76 impact shall be assessed and, on a case-by-case basis, specific arrangements to limit this impact shall
77 be considered. However, in any event this impact should not constitute a criterion for refusal of a
78 marketing authorisation.

79 An ERA is required for all new marketing authorisation applications for a medicinal product through a
80 centralised, mutual recognition, decentralised or national procedure.

81 For type II variations, the ERA dossier should be updated if there is an anticipated increase in the
82 environmental exposure, e.g. a new indication which results in an increase in the extent of the use. For
83 extension applications according to Annex II of Commission Regulation (EC) No 1085/2003, ERA is also
84 required if there is an anticipated increase in the environmental exposure, e.g. an extension application
85 of an oral medicinal product to include a dermal patch. The environmental data previously submitted in
86 the original dossier of the same marketing authorization holder (MAH) may serve as a basis for the
87 revised ERA for the variation or extension application.

88 An ERA is not required for renewals of marketing authorisations or Type IA/IB variations. For further
89 details, please refer to the Agency's pre-authorisation guidance, Q&A No 3.4.2.

90 According to Directive 2001/83/EC, applicants are required to submit an ERA irrespective of the legal
91 basis. Generic medicinal products are therefore not exempted from providing an ERA. However, cross
92 reference to the ERA dossier of the originator is permitted with consent from the originator.

93 This guideline does not apply to medicinal products consisting of genetically modified organisms
94 (GMOs). Applicants are referred to the guideline on "Environmental Risk Assessment for Human
95 Medicinal Products containing, or consisting of, genetically modified organisms (GMOs) (Module 1.6.2)
96 (EMEA/CHMP/473191/06 - Corr)".

97 For marketing authorisation applications for radio-pharmaceutical precursors for radio-labelling and
98 radio-pharmaceuticals, additional requirements on emission standards for radiation set by Council
99 Directives 2013/59/Euratom should be taken into account.

100 Excipients do not generally require an ERA unless there is a specific toxicological effect to suggest an
101 environmental risk under the product's conditions of use.

102 **3. General Principles**

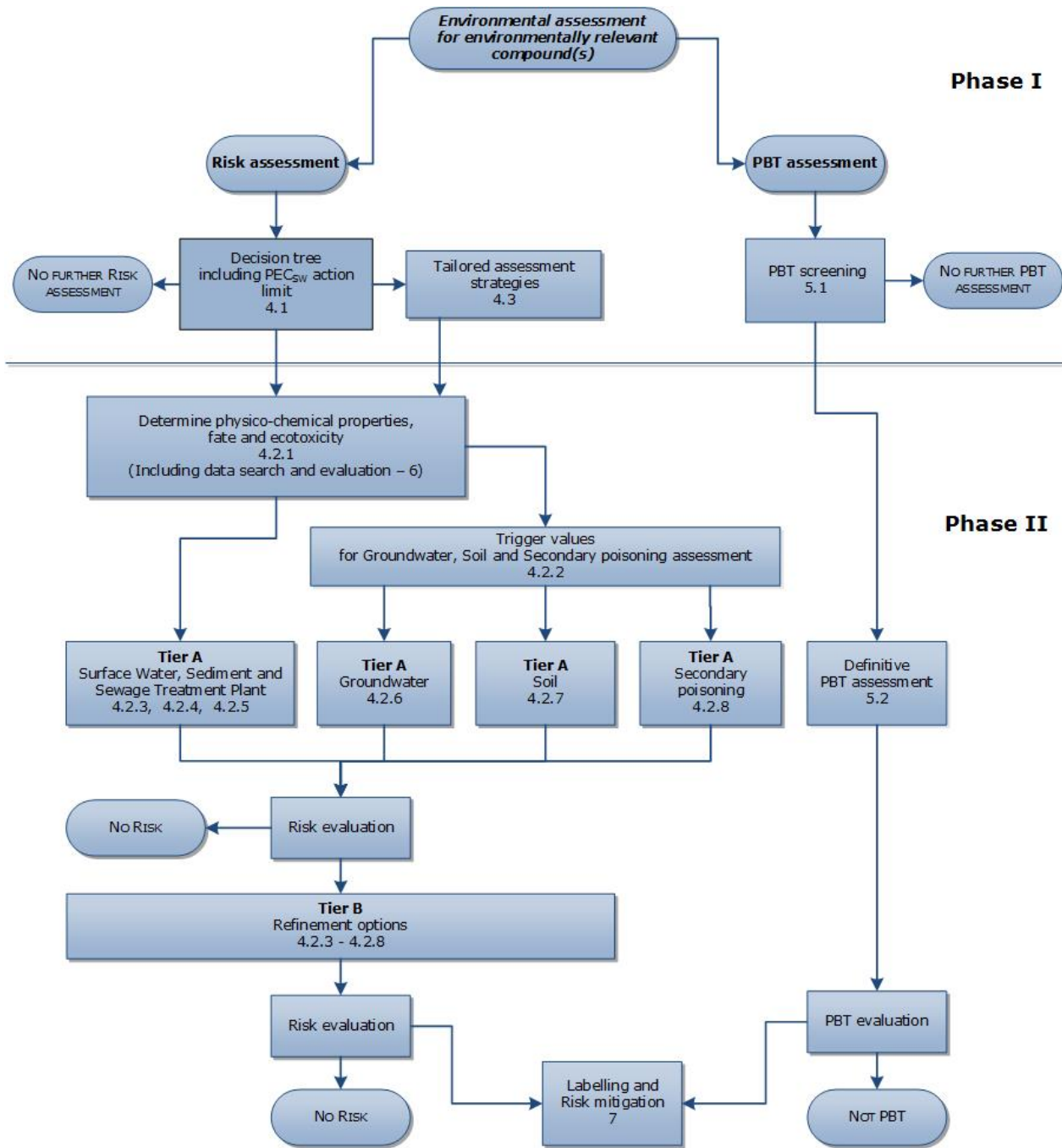
103 ***3.1. Overview of the risk assessment and PBT assessment***

104 For each medicinal product, both a risk assessment and a specific hazard assessment for persistent,
105 bioaccumulative and toxic (PBT) properties is required (see Figure 1). The risk assessment reflects the
106 possibility of an effect occurring, and is an evaluation of both exposure of organisms in the
107 environment to the active substance and ecotoxicity. For some substances with specific classifications
108 (e.g. endocrine active substances (EAS), antibiotic substances), a tailored risk assessment is
109 necessary. The PBT assessment concerns the intrinsic properties of a specific group of active
110 substances, which are potentially harmful to the environment regardless of the levels of exposure.
111 Active substances that do not degrade well in the environment (persistent), accumulate in organisms
112 (bioaccumulative), and are toxic, are identified in the PBT/vPvB (very persistent and very
113 bioaccumulative) assessment.

114 The ERA may consist of a justification for not submitting ERA studies. However, this only applies to
115 certain cases which are specified in section 4.1 and 5.1.

116 In the interest of animal welfare the principles of 3Rs (Replacement, Reduction and Refinement) in
117 accordance with Directive 2010/63/EU should be implemented whenever possible.

118 **Figure 1:** Overview of the environmental risk and PBT assessment including references to section
 119 numbers in the main text.



120

121

122 3.1.1. Risk assessment

123 In Phase I, a decision tree (**Figure 2**, section 4.1) is followed to identify the products that require a
 124 Phase II assessment. The Phase I decision tree concludes with the calculation of a Predicted
 125 Environmental Concentration in surface water (PEC_{sw}), based on the predicted use of the product.
 126 When this PEC is ≥ the action limit of 0.01 µg/L, a Phase II assessment (section 4.2) should be
 127 performed. Some substances (e.g. endocrine active substances and antiparasitics) should enter Phase
 128 II regardless of their PEC value (see decision tree, **Figure 2**), because they may affect organisms in
 129 the environment at concentrations < 0.01 µg/L.

130 The Phase II risk assessment starts with studies on physico-chemical properties, and on the
131 environmental fate and ecotoxicological effects of the active substance. For some groups of
132 substances, a tailored risk assessment strategy should be followed that addresses their specific
133 mechanism of action (section 4.3). In Tier A, the PEC is compared to an acceptable environmental
134 concentration, the Predicted No Effect Concentration (PNEC). When a risk is identified in Tier A, a Tier
135 B assessment with PEC refinement and if warranted further effect studies should be performed.

136 The studies that should be performed in Phase II Tier A on physico-chemical characteristics, fate and
137 ecotoxicity are described in section 4.2.1. The requirement for a risk assessment for certain
138 environmental compartments (soil and groundwater) depends on whether trigger values are met by
139 the outcome of these studies. Information on data search and evaluation is provided in section 6.

140 The Phase II risk assessment for the surface water compartment including options for risk refinement
141 is described in section 4.2.3. Sections 4.2.4. - 4.2.7. give guidance on Phase II risk assessment and
142 risk refinement for sediment, functioning of sewage treatment plants (STP), soil and groundwater,
143 respectively. The assessment of risk to predators eating contaminated prey (secondary poisoning) is
144 described in section 4.2.8.

145 **3.1.2. PBT assessment**

146 The PBT (Persistent, Bioaccumulative and Toxic) assessment concerns the identification of certain
147 intrinsic properties of the active substance. These properties make the long-term risks to the
148 environment unpredictable; hence environmental exposure should be prevented as much as possible.
149 As the PBT assessment concerns intrinsic properties of the active substance subsequent exposure is
150 not considered. The assessment of PBT and vPvB properties is described in section 5. Compounds
151 entering the screening phase (section 5.1) are identified in the first part of the decision tree (Question
152 1-3). Depending on the outcome of the screening phase, a definitive assessment may be required.
153 (section 5.2).

154 In exceptional cases for substances which do not meet the trigger for PBT assessment ($\log K_{ow} > 4.5$)
155 an assessment of PBT/vPvB properties may be required. This will be the case if the results obtained in
156 Phase II of the risk assessment demonstrate that the B- and T-criteria are met, or if the vB-criteria is
157 met (see **Table 16**).

158 **3.1.3. Finalization of risk and PBT assessment**

159 When a risk is identified and/or a substance is classified as PBT/vPvB, this information should be
160 included in the SmPC and risk mitigation measures should be discussed. These are described in section
161 7.

162 The structure of the risk assessment report is described in section 8.

163 **3.2. General considerations**

164 The ERA should be performed for the environmentally relevant chemical species, which in most cases
165 is the parent compound.

166 **3.2.1. Total residue approach**

167 The ERA is based on a 'total residue approach', i.e. the assumption that the active substance is
168 completely excreted as parent substance without metabolism or assuming that metabolites have
169 similar or lower toxicity than that of the parent substance.

170 Metabolism of the active substance may be taken into account in Phase II, see section 4.2.3.2.

171 For a **prodrug**, the most environmentally relevant substance will generally be the pharmacologically
172 active metabolite. However, there may be instances where a prodrug is incompletely converted to the
173 active (<50%), or excreted largely (>50%) intact or via metabolic pathways that do not generate the
174 active moiety. In these cases, the selection of the environmentally relevant chemical species should be
175 justified. In some cases, assessment of both prodrug and active may be necessary.

176 For **fixed combination products**, the ERA is performed separately for each compound within the
177 product.

178 **3.2.2. Test guidelines**

179 Experimental studies performed by or on behalf of the applicant should be GLP-compliant and
180 preferably follow the most recent test guidelines issued by the Organization for Economic Co-operation
181 and Development (OECD) or comparable international validated test guidelines. QSARs (Quantitative
182 Structure-Activity Relationships) and read-across cannot replace the studies requested in this
183 guideline.

184 A number of methods used in this guideline are based on methods described in the REACH (e.g. ECHA,
185 2016; ECHA, 2017a-d) and Water Framework Directive EQS (European Communities, 2011) guidelines,
186 as well as OECD guidance documents and technical guidelines. In case of future revisions of these
187 guidelines, the revised version of the relevant method or test guideline should be used.

188 **3.2.3. Publicly available data**

189 For active substances that are already marketed, information may be available in the public domain.
190 To prevent repetition of (animal) studies and allow identification of signals emerging from
191 environmental monitoring and research, the Applicant should provide a complete literature review (See
192 section 6.1 on data search). When other marketing authorisation holders have already performed
193 relevant studies, they are encouraged to share data with the Applicant, in order to minimise the
194 number of tests having to be re-performed. Public Assessment Reports (PARs and EPARs) and reviews
195 or summary data from other regulatory frameworks cannot be used in the ERA dossier without the
196 underlying study reports. All data submitted (whether study reports or peer reviewed literature) should
197 contain enough information to permit assessment of the reliability of the study performed (See section
198 6.2 on evaluation of studies).

199 **4. Risk Assessment**

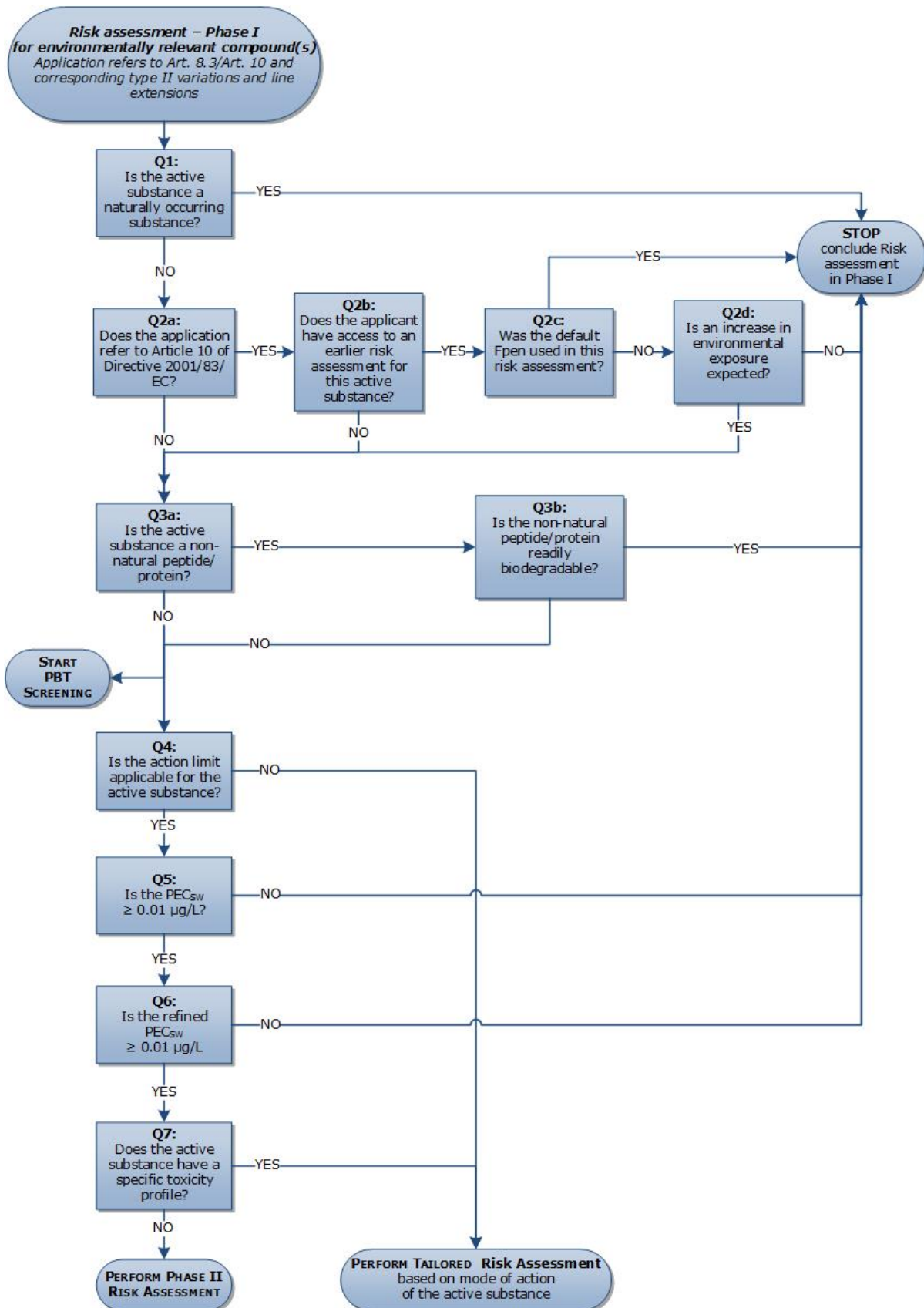
200 **4.1. Phase I Risk Assessment**

201 This section presents guidance on how to conduct the Phase I risk assessment. The potential for
202 environmental exposure is assessed based on the nature of the active substance and the intended use.
203 In Phase I, products that require a more extensive Phase II risk assessment – either standard or
204 tailored - are identified. It is assumed that active substances with limited use and/or limited
205 environmental exposure will have limited environmental effects, and thus the risk assessment will stop
206 in Phase I.

207 The Phase I risk assessment consists of a decision tree (**Figure 2**). The questions in the decision tree
208 are described in detail below **Figure 2**. The outcome of Phase I may be that the risk assessment stops,
209 or that a Phase II risk assessment is required. When at least one of the Phase I criteria to stop the risk

210 assessment has been met, the applicant should produce a report on the ERA, discussing the basis for
 211 the decision.

212 **Figure 2: Phase I Decision tree (Q: question)**



213

214 **Questions in Phase I Decision tree (Figure 2):**

215 **Q1: Is the active substance a naturally occurring substance?**

216 In the case of medicinal products comprised of naturally occurring substances such as vitamins,
217 electrolytes, amino acids, peptides, proteins, nucleotides, carbohydrates and lipids as active
218 pharmaceutical ingredient(s) (API), the ERA may consist of a justification for not submitting ERA
219 studies, e.g. that due to the physico-chemical nature of the API these products are unlikely to pose a
220 risk to the environment or based on the environmental fate and/or common presence in the
221 environment these products are unlikely to alter the concentration or distribution of the substance in
222 the environment.

223 The same criteria applies to herbal medicinal products as defined in Directive 2004/24/EC. However,
224 there may be exceptional cases where further justification for the absence of studies might be
225 necessary, e.g., when a compound is classified as being a carcinogen, mutagen, or toxic for
226 reproduction (CMR) or PBT (see section 5), or if a risk has been identified in another framework.

227 Vaccines are unlikely to result in a risk to the environment and the ERA may consist of a justification
228 for not submitting ERA studies. Adjuvants contained in vaccines may however require additional
229 justification for the absence of ERA studies according to the principles outlined above.

230 **Q2a: Does the application refer to Article 10 of Directive 2001/83 EC as amended?**

231 According to Directive 2001/83/EC as amended, applicants are also required to submit an ERA for
232 applications under Art 10(1) and 10(2) -generic medicinal products, Art 10(3)-hybrid, Art 10a-well
233 established use/bibliographical, Art 10b fixed combinations, Art 10c informed consent and Art 10(4)
234 similar biological applications.

235 **Q2b: Does the applicant have access to an earlier ERA for the active substance?**

236 In order to avoid unnecessary repetition of studies, and in particular animal studies, applicants are
237 encouraged to share their data. If the current applicant has access to an ERA that was performed
238 earlier by another marketing authorisation holder, this ERA (including study reports) may be
239 submitted, including a letter of access. If the reference ERA is not complete in accordance with the
240 current guideline (e.g. studies are missing, or increased environmental exposure may be anticipated)
241 the applicant should conduct the missing studies and/or update the ERA.

242 **Q2c: Was the default market penetration factor (F_{pen}) used in this risk assessment?**

243 If the default F_{pen} (0.01) was used in this earlier risk assessment, and provided that the indication is
244 the same, the outcome of the risk assessment will not change and the risk assessment stops.
245 However, if a refined F_{pen} was used, this F_{pen} may change and thus the outcome of the risk
246 assessment may change.

247 **Q2d: Is an increase in environmental exposure expected?**

248 An increase in environmental exposure may be expected when e.g., a new indication or a new patient
249 population is added, the maximum daily dose is increased, a new route of administration or a new
250 pharmaceutical form is added or a marketing authorisation is applied for in a member state with a
251 higher prevalence of the disease. If a refined F_{pen} was used in the previous ERA, an applicant applying
252 for a marketing authorization in a new member state should compare the prevalence in this new
253 member state with the prevalence used to refine F_{pen} in the previous ERA. If the environmental
254 exposure for any reason is increased compared to the environmental exposure used in the previous
255 ERA, the ERA should be updated accordingly.

256 **Q3a: Is the active substance a non-natural peptide/protein?**

257 Peptides and proteins that have been structurally modified using non-natural amino acids to increase
258 biostability are considered non-natural.

259 Protein-drug conjugates including natural proteins do not belong to this group and would require
260 standard assessment of the non-protein-moiety.

261 **Q3b: Is the non-natural peptide/protein readily biodegradable?**

262 For non-natural peptides/proteins, an additional screening step should be performed to demonstrate
263 that they will be quickly degraded in the environment and will not enter the STP.

264 When the non-natural peptide/protein is demonstrated to be excreted in amounts < 10% of the dose,
265 or shown to be readily biodegradable in an OECD 301 test, the ERA stops.

266 **Q4: Is the PEC_{SW} action limit of 0.01 µg/L applicable for the active substance?**

267 For active substances that can affect environmental organisms at concentrations < 0.01 µg/L, the
268 action limit may not be applicable. Examples include endocrine active substances (EAS) and
269 antiparasitics. For EAS, a tailored risk assessment is required. More information on identification and
270 tailoring of studies for EAS and other specific active substances can be found in section 4.3.

271 **Q5: Is the $PEC_{SW} \geq 0.01 \mu\text{g/L}$?**

272 In Phase I, the predicted environmental concentration (PEC) calculation is restricted to the surface
273 water compartment. The PEC_{SW} is calculated using default values and the following assumptions:

- 274
- 1% of a population receive the active substance daily.
 - The sewage system is the main route of entry of the active substance into the surface water.
 - There is no biodegradation or retention of the active substance in the sewage treatment plant (STP).
 - There is no metabolism in the patient.

279 The PEC_{SW} concentration can be calculated using the following formula in Equation 1:

$$PEC_{SW} = \frac{DOSE_{AS} \times F_{PEN}}{WASTEW_{INHAB} \times DILUTION} \quad \text{Eq. 1}$$

281

282 Parameters used in Eq 1:

Parameter	Description	Unit	Default value
PEC_{SW}	Predicted environmental concentration for surface water calculated in Phase I	[mg L ⁻¹]	-
$DOSE_{AS}$	Maximum daily dose of the active substance consumed per inhabitant	[mg inh ⁻¹ d ⁻¹]	-
F_{PEN}	Fraction of a population receiving the active substance	[--]	0.01
$WASTEW_{INHAB}$	Amount of wastewater per inhabitant per day	[L inh ⁻¹ d ⁻¹]	200
DILUTION	Dilution factor	[--]	10

283

284 If the PEC_{SW} value is < 0.01 µg/L and no other environmental concerns are apparent, it is assumed
285 that the medicinal product is unlikely to represent a risk for the environment following its prescribed
286 usage in patients and no further risk assessment is required.

287 **Q6: Is the refined PEC_{SW} ≥ 0.01 µg/L?**

288 PEC_{SW} may be refined by refining the F_{PEN} value based on prevalence data and/or based on the
289 treatment regimen. For medicinal products, which can be used for more than one indication, the
290 calculation of refined PEC_{SW} should take into account all designated indications for the product. The
291 total PEC_{SW} is the sum of the PEC_{SW} for each indication, which should be calculated using the maximum
292 prescribed dose for each indication. The other default values representing a realistic worst case
293 environmental exposure scenario should not be replaced by other data. If the refined PEC_{SW} value is <
294 0.01 µg/L, and no other environmental concerns are apparent (e.g. the compound is a potential EAS or
295 paraciticide), it is assumed that the medicinal product is unlikely to represent a risk for the
296 environment following its prescribed usage in patients and no further risk assessment is required.

297 Prevalence: The F_{PEN} can be refined by submitting European disease prevalence data for the sought
298 indication(s). Such data should be published by a reliable and independent source, e.g. a peer-
299 reviewed scientific journal or the World Health Organization (WHO) (e.g., the International Agency for
300 Research on Cancer (IARC)). It is assumed that 100% of the patient population is taking the medicinal
301 product for the relevant disease(s) daily and thus the F_{pen} reflects the prevalence of the disease. If
302 regional differences exist, the F_{PEN} should be calculated for the member state or region with the highest
303 prevalence of the disease. This member state should be one of the member states included in the
304 authorisation procedure. Prevalence data at subnational level (i.e. for regions smaller than a country)
305 can also be used in the risk assessment, provided they are of good quality as described above and
306 justification for use in the risk assessment is provided. Prevalence data should be as recent as
307 possible, preferably not older than 5 years. The use of older data should be justified. For orphan drug
308 submissions, the F_{PEN} can be refined based on the prevalence for which the medicinal orphan drug
309 designation was based, as adopted by the Committee for Orphan Medicinal Product (COMP). One year
310 prevalence data should be used unless other prevalence data (e.g. multiple year prevalence, lifetime
311 prevalence or incidence if appropriate) can be justified considering epidemiologic and posology data
312 available for the supported indication.

313 Treatment regimen: The F_{PEN} may be refined taking the worst-case treatment period (t_{TREATMENT}) and
314 worst-case number of treatment repetitions per year (n_{TREATMENT}) into consideration. This is easily done
315 for products intended for single use (e.g. during surgery, diagnostics, etc.) or other products with a
316 well-defined treatment regimen. For example, an anti-cancer drug administered for five days in
317 monthly cycles, t_{TREATMENT} equals 5 days and n_{TREATMENT} would be 12 year⁻¹. The posology should be
318 clearly reflected in the SmPC. For other treatment patterns, F_{pen} refinement based on an intermittent
319 treatment regimen should be based on clinical considerations and justified by a reliable and
320 independent source. In exceptional cases, refinement based on clinical considerations is possible
321 without the presence of public literature. This is only acceptable if these clinical considerations are
322 well-described and based on clinical data in the dossier; for instance, in the case of anti-cancer
323 treatment with a maximum number of treatments per year (e.g. once every 3 weeks) where severe
324 adverse effects prevent an increase in treatment regimen. Refinement based on treatment regimen is
325 not justified for pharmaceuticals dosed 'as needed' unless this is based on published scientific
326 literature.

327 The following approach may be used for the refinement of F_{PEN} by prevalence data and /or by
328 treatment regimen:

329

$$F_{PEN-REFINED} = \frac{P_{REGION} \times t_{TREATMENT} \times n_{TREATMENT}}{Nd} \quad \text{Eq. 2}$$

330
331 The $F_{PEN-REFINED}$ should be used for the calculation of refined PEC_{SW} using Equation 3:

$$PEC_{SW} = \frac{DOSE_{AS} \times F_{PEN-REFINED}}{WASTE_{INHAB} \times DILUTION} \quad \text{Eq. 3}$$

332
333
334 Parameters used in Eq.2 and 3:

Parameter	Description	Unit	Default value
$F_{PEN-REFINED}$	Refined fraction of a population receiving the active substance during a given time	[--]	
P_{REGION}	Prevalence for the region with the highest prevalence, as described above	[--]	
$t_{TREATMENT}$	Duration of one treatment period	[d]	
$n_{TREATMENT}$	Number of treatments per year	[yr ⁻¹]	
Nd	Number of days per year	[d yr ⁻¹]	365
PEC_{SW}	Predicted environmental concentration in surface water based on $F_{PEN-REFINED}$	[mg L ⁻¹]	
$DOSE_{AS}$	Maximum daily dose of the active substance consumed per inhabitant	[mg inh ⁻¹ d ⁻¹]	
$WASTE_{INHAB}$	Amount of wastewater per inhabitant per day	[L inh ⁻¹ d ⁻¹]	200
$DILUTION$	Dilution factor	[--]	10

335
336 If the PEC_{SW} value based on a refined F_{PEN} is < 0.01 µg/L, and no other environmental concerns are
337 apparent, it is assumed that the medicinal product is unlikely to represent a risk for the environment
338 following its prescribed usage in patients and no further risk assessment is required.

339 **Q7: Does the active substance have a specific toxicity profile?**

340 A tailored risk assessment is needed for compounds with a specific mode of action (e.g., endocrine
341 active substances, antibiotics), see section 4.3.

342 **4.2. Phase II Risk Assessment**

343 **4.2.1. Determination of physico-chemical properties, fate and ecotoxicity**

344 Physico-chemical properties of active substances are important drivers for fate and toxicity. The
345 determination of some of these properties is therefore mandatory for the assessment. **Table 1** gives
346 an overview of the mandatory and non-mandatory studies on physico-chemical properties, fate and
347 ecotoxicity. This base set of data cannot be omitted even if studies such as OECD 303A and OECD
348 314B show degradation in sewage treatment plants (STPs), because the availability of STPs varies
349 across Europe and removal efficiencies for pharmaceuticals vary considerably. A description of the
350 studies is provided below.

351 Experimental studies should preferably follow the test guidelines issued by the OECD or the European
 352 Commission. It is recognised that there are other test guidelines, approaches and methods, which are
 353 capable of providing an equivalent environmental risk assessment. If methods other than those
 354 described in this section are used, a justification should be included in the Environmental Risk
 355 Assessment Report.

356 **Table 1:** Studies to be performed for Phase II Tier A assessment

Study	Guideline
<i>Physico-chemical properties (4.2.1.1)</i>	
Water solubility	OECD 105
Octanol/Water Partitioning (#)	OECD 107 or 123
Dissociation in Water	OECD 112
UV-Visible Absorption Spectrum (*)	OECD 101
Melting Point/Melting Range (*)	OECD 102
Vapour Pressure (*)	OECD 104
<i>Fate properties (4.2.1.2)</i>	
Adsorption - Desorption Using a Batch Equilibrium Method with 3 soils and 2 sludges	OECD 106
Ready Biodegradability Test	OECD 301
<i>Aquatic toxicity (4.2.1.3)</i>	
Algae, growth inhibition	OECD201
Daphnia sp. reproduction	OECD 211
Fish, Early life stage toxicity	OECD 210
<i>Functioning of STP (4.2.5.1)</i>	
Activated sludge, respiration inhibition	OECD 209
<i>Sediment toxicity (choose one of the tests below) (4.2.1.3)</i>	
Lumbriculus sp., spiked sediment	OECD 225
Chironomus, sediment-water toxicity	OECD 218/219
Chironomus, sediment-water life-cycle toxicity	OECD 233

357 (*) Not mandatory.
 358 (#) Study also requested for Phase I PBT screening.

359

360 **4.2.1.1. Physico-chemical characteristics**

361 **Water solubility**

362 The solubility of the active substance should be determined experimentally, using the most appropriate
 363 method according to the OECD 105 test guideline. For dissociating compounds, the test should be
 364 performed at pH 5, 7 and 9. The results of this test are used to verify exposure concentrations in fate
 365 and ecotoxicity tests. Additionally, solubility should be compared to the octanol/water partitioning
 366 value, to evaluate the plausibility of the results.

367 **Octanol/water partitioning coefficient (Kow)**

368 The octanol/water partitioning coefficient, Kow, should be determined experimentally using the shake-
369 flask method (OECD 107) or the slow-stirring method (OECD 123). A calculated value is generally not
370 acceptable. The results from the HPLC screening method (OECD 117) may only be used for indicative
371 purposes, e.g. for compounds, which are highly soluble and have a predicted log Kow < 1 at all
372 environmentally relevant pH values.

373 For compounds with log Kow > 4, the shake-flask method cannot be used and only the slow - stirring
374 method is acceptable. This range of applicability is based on OECD guidelines 123 and 107.

375 For dissociating compounds, an ion-corrected log Dow for the neutral molecule should be reported
376 together with the respective pKa value(s). The ion-corrected Dow is equal to Kow.

377 Log Dow values should be determined as a function of pH covering an environmentally relevant pH-
378 range (at least 3 pH values ranging from pH 5 to 9) e.g. by measuring the pH-lipophilicity profile
379 (log D as function of pH). If the Dow value (for dissociating substances) at any pH value between pH 5
380 and pH 9 meets the trigger values for assessment of secondary poisoning (log Kow ≥ 3) or PBT
381 assessment (log Kow > 4.5), further assessment is required (see Section 4.2.8 and 5).

382 **Dissociation constant**

383 The dissociation constant should be determined for dissociating compounds. The results of this study
384 are used to verify exposure concentrations in fate and ecotoxicity tests. Additionally, the information is
385 required to determine the octanol/water partitioning coefficient.

386 **4.2.1.2. Fate studies**

387 Along with mandatory studies on physico-chemical properties, mandatory fate studies should be
388 included in the ERA in order to evaluate the fate and predict the environmental exposure of the
389 medicinal product. These mandatory studies are listed in **Table 1**.

390 **Sorption to soil and sludge**

391 Adsorption/desorption studies generate essential information on the mobility of the active substance
392 and its distribution in the soil and water compartments. This is a complex process depending on many
393 factors including chemical properties, characteristics of the soil and climatic factors. Therefore,
394 different sludge and soil types should be used in order to cover as widely as possible the interactions of
395 the active ingredient with sludge and soils.

396 A study according to OECD 106 using 2 types of sludge and 3 soil types, differing in organic carbon
397 content, and soil texture is preferred. The results are used to evaluate the requirement for soil and
398 groundwater assessment (section 4.2.2) and to perform PEC calculations for soil and sediment in
399 Phase II Tier A. In Phase II Tier B, adsorption data for at least 2 types of sludge, preferably from two
400 different STPs are necessary for PEC_{SW} refinement (SimpleTreat modelling, section 4.2.3.2). Adsorption
401 data for at least 3 soils are needed for equilibrium partitioning calculations in the sediment risk
402 assessment (Section 4.2.4) and refinement of PEC_{GW} in Tier B (section 4.2.6.2). An overview of Phase
403 II risk assessment steps where adsorption data are needed is listed in **Table 2** below.

404 The targeted endpoint for adsorption studies should be the distribution coefficient (Kd), defined as the
405 ratio between the content of the substance in the soil/sludge phase and the mass concentration of the
406 substance in the aqueous solution, under the test conditions, when adsorption equilibrium is reached.
407 The organic carbon normalized adsorption coefficient (Koc) relates the distribution coefficient Kd to the
408 organic carbon content of the soil sample.

409 **Table 2:** Use of adsorption data in Phase II risk assessment

Adsorption needed in Phase II	Tier A	Tier B
Surface water	Not needed	SimpleTreat - Input: lowest $K_{OC_{SLUDGE}}^*$ for partition coefficient in raw sewage (K_{p_s}) and activated sludge ($K_{p_{AS}}$) Refined PEC_{SW} -calculation: Lowest $K_{OC_{SOIL}}$ for FACTOR (sorption on suspended matter in surface water)
Sediment	PEC_{SED} -calculation: K_{SUSP_WATER} with highest $K_{OC_{SOIL}}^{**}$	Not needed
Groundwater	Trigger: lowest $K_{OC_{SLUDGE}}^*$	SimBaFi - Input: lowest $K_{d_{SOIL}}^{**}$
Soil	Trigger: highest $K_{OC_{SLUDGE}}^*$ SimpleTreat - Input: highest $K_{OC_{SLUDGE}}^*$ for partition coefficient in raw sewage (K_{p_s}) and activated sludge ($K_{p_{AS}}$)	Not needed

410 * $n_{SLUDGE} \geq 3$: geometric mean, $n_{SLUDGE}=2$: worst case

411 ** $n_{SOIL} \geq 4$: geometric mean, $n_{SOIL} = 3$: worst case

412

413 In order to extract the active substance from sludge or soil, the best available extraction techniques
414 should be used. This means that various extraction methods should be used with increasing strength,
415 e.g. according to the methodology as proposed by ECETOC (2013b). The evaluation of the feasibility of
416 various extraction techniques should be reported in the final study report. Usually, a direct method
417 with radiolabelling provides the most robust information.

418 **Ready biodegradability**

419 The readily biodegradability of a substance should be determined according to OECD 301. The
420 microbial community should not be pre-exposed to the test compound in this test, and addition of
421 more inoculum is not allowed. OECD 301 can be waived if OECD 314 B (for PEC refinement in Phase II
422 Tier B) or OECD 308 (for PBT assessment or PEC refinement for groundwater) is performed. The
423 results of OECD 301 are used for triggering soil and groundwater assessment and in the Simple Treat
424 calculation. Substances classified as not readily biodegradable are considered potentially persistent.

425 **4.2.1.3. Ecotoxicity studies**

426 To determine the aquatic ecotoxicity, chronic ecotoxicity data i.e. No Observed Effect Concentration
427 (NOEC) or 10% effect concentration (EC10) for species from three trophic levels are required (See
428 **Table 1**). The risk assessment for the aquatic and sediment compartment is based on chronic
429 exposure and effects because the emission of pharmaceutical residues into surface water is continuous.

430 Studies with other aquatic test species and/or studies providing other endpoints than the standard
431 OECD endpoints (growth, mortality, reproduction)¹ may also be used, provided they are relevant for
432 population dynamics (according to the description in the Water Framework Directive EQS (European
433 Communities, 2011).

434 The ecotoxicity tests should be performed under the conditions as described in their respective test
435 guidelines. Validity criteria as described in the test guidelines should be reported and if these are not
436 met, the test should be repeated.

437 Concentrations should be measured analytically and results should be based on measured
438 concentrations when measured concentrations are not within 80-120% of nominal concentrations.
439 When a reliable concentration-response curve is observed, the NOEC as well as the EC10 should be
440 reported. The EC10 is preferred over the NOEC for PNEC derivation, even if the former is higher than
441 the latter.

442 A limit test, as defined in the respective OECD ecotoxicity guidelines, may be used to determine the
443 correct exposure concentrations. This can only replace a definitive test when no effects are observed at
444 the limit concentration and no risk is identified. If a PNEC is based on an 'unbounded' value, e.g., a
445 higher than- NOEC (NOEC > X mg/L), the RQ (PEC/PNEC) would also become unbounded (PEC/PNEC <
446 XX). If this RQ is ≥ 1 , a risk is identified and a concentration-response relationship should always be
447 established using an appropriate concentration range, resulting in a 'bounded' value for the PNEC and
448 a subsequent concrete RQ. Similarly, when several concentrations are tested but no EC10 or NOEC can
449 be determined because there is a significant effect at the lowest test concentration, the test should be
450 repeated with lower test concentrations in order to establish a correct concentration-response
451 relationship.

452 Regarding the algal test, the use of a green alga is generally recommended for OECD 201. For some
453 compounds, such as antibiotics, the use of cyanobacteria is more appropriate (See section 4.3.1). In
454 both situations, initial growth rate is the preferred endpoint, even if the endpoint biomass (yield)
455 results in lower (no-)effect concentration (see also section R.7.8.4.1. in ECHA, 2017b). The high
456 growth rate of algal cells makes it possible for algal population to recover within the 72 h test duration
457 as a result of a decline in exposure concentration (e.g. through hydrolysis and photolysis). However,
458 recovery should be disregarded, as algae act as a model organism for all aquatic photoautotrophic
459 organisms, including aquatic macrophytes with a much longer generation time.

460 For endocrine active substances (EAS), the fish early life stage (FELS) test should be replaced by
461 other, more sensitive test(s), see section 4.3.2.

462 **4.2.2. Trigger values for soil, groundwater, and secondary poisoning**

463 For substances entering Phase II risk assessment, the surface water, sediment and STP compartments
464 always require assessment. If the active substance meets certain trigger values, the risk assessment
465 should also be performed for soil, groundwater and/or secondary poisoning. These trigger values are
466 outlined below.

467 ***Soil***

468 Active substances with high affinity for organic carbon have a greater likelihood of accumulating in
469 sludge and ending up in the soil, unless the active substance is readily biodegradable. However,
470 substances with lower adsorption affinity may also be present in sludge at high concentrations, when

¹ Behaviour is an example of an ecotoxicological endpoint not yet established as a reliable and standardised endpoint. It may however be very relevant for neuro-active substances and when standardised guidelines become available, be taken up in a tailored risk assessment scheme for neuro-active substances.

471 the release to sewage treatment plants is high. Hence, the final exposure of soil organisms depends on
 472 both main parameters, i.e. the properties of the pharmaceutical (Koc value) and the total release to
 473 the wastewater flow, which again depends on the dose and the fraction of a population receiving the
 474 active substance during a given time. The PEC_{SW} calculated in Phase I, reflects directly these
 475 parameters, as it disregards processes such as biodegradation or retention of the active substance in
 476 the STP. Hence, the PEC_{SW} is used in combination with Koc to trigger assessment for the soil
 477 compartment, see **Table 3** and section 4.2.6.

478 **Table 3:** Combined trigger values for substances entering a risk assessment for soil organisms

Koc_{SLUDGE}^* [L kg ⁻¹]	PEC_{SW} [µg L ⁻¹]
$Koc_{SLUDGE} \geq 10,000$	Trigger irrespective of PEC_{SW}
$5,000 \leq Koc_{SLUDGE} < 10,000$	≥ 1
$2,500 \leq Koc_{SLUDGE} < 5,000$	≥ 2
$1,000 \leq Koc_{SLUDGE} < 2,500$	≥ 3
$Koc_{SLUDGE} < 1000$	No trigger – irrespective of PEC_{SW}

479 * $n_{SLUDGE} \geq 3$: geometric mean, $n_{SLUDGE}=2$: worst case

480

481 **Groundwater**

482 A risk assessment for groundwater is required when the Koc_{SLUDGE} is $\leq 10,000$ L kg⁻¹, unless the
 483 substance is readily biodegradable (see section 4.2.6).

484 **Secondary poisoning**

485 A secondary poisoning risk assessment is required if the octanol/water partition coefficient (log Kow) is
 486 ≥ 3 (see section 4.2.8).

487 **4.2.3. Surface water**

488 To determine a potential risk to the surface water compartment, the PEC_{SW} (as calculated in Phase I) is
 489 compared to the $PNEC_{SW}$. This PNEC is derived using experimental chronic ecotoxicity data for fresh
 490 water species (**Table 1**) because continuous exposure of the aquatic environment via effluents from
 491 STPs is assumed. When the $PEC/PNEC$ ratio is ≥ 1 , a risk to the aquatic compartment as a whole (not
 492 a particular sensitive group of species) is indicated. If a risk is identified in Phase II Tier A, a refined
 493 assessment may be performed in Phase II Tier B.

494 **4.2.3.1. Phase II Tier A assessment for surface water**

495 Exposure assessment for surface water

496 The final PEC_{SW} as calculated in Phase I should be used (see Eq. 1-3).

497 Effect assessment for surface water

498 To derive a PNEC, chronic ecotoxicity data for species from at least three trophic levels (algae, Daphnia
 499 and fish) are required, as described in section 4.2.1.

500 The $PNEC_{SW}$ is calculated by applying an assessment factor (AF) of 10 to the lowest EC10 or NOEC
 501 value from the aquatic test species. The AF is an expression of the degree of uncertainty in the
 502 extrapolation from a limited number of test species to complex ecosystems in the actual environment
 503 and accounts for, inter-species variations in sensitivity, intra-species variability and laboratory data to
 504 field impact extrapolation.

505 **Table 4:** Ecotoxicological studies used in the effect assessment for surface water

Study	Endpoint ^a	Guideline
Aquatic toxicity (4.2.1.3)		
Algae, growth inhibition	EC10 or NOEC [mg L ⁻¹]	OECD 201
Daphnia sp. reproduction	EC10 or NOEC [mg L ⁻¹]	OECD 211
Fish, Early life stage toxicity	EC10 or NOEC [mg L ⁻¹]	OECD 210

506 ^a EC10 values are preferred over NOECs in the risk assessment.

507

508 Risk characterisation

509 Using the PNEC_{SW}, the risk quotient (RQ) for the surface water is determined (equation 4).

510

$$RQ_{SW} = \frac{PEC_{SW}}{PNEC_{SW}} \quad \text{Eq. 4}$$

511

512 If the surface water RQ is < 1, then further testing in surface water is not required and it can be
513 concluded that the active substance is unlikely to represent a risk to surface water.

514 If the surface water RQ is ≥1, a Tier B assessment is required.

515 **4.2.3.2. Phase II Tier B assessment for surface water**

516 When a risk is established in Tier A, the PEC_{SW} may be refined using one or more of the options below:

517 • F_{pen}, if not refined in Phase I Tier A. For more information, see Q6 in section 4.1.

518 • Consumption data

519 • Metabolism

520 • Potential removal in the STP.

521 Refinement of PEC_{SW} using consumption data

522 At the renewal of a marketing authorisation for a medicinal product, consumption data on the active
523 substance may be used to refine F_{PEN} (equation 5) and the PEC_{SW}, with the possibility of a
524 consequential impact on the conclusion of the previous ERA. The data used should come from a reliable
525 and publicly available source and demonstrate a stable consumption over the last 3 or more years. A
526 market share of 100% is always assumed. If regional differences exist, data from the member state
527 with the highest calculated F_{PEN} should be used.

528

$$F_{PEN-REFINED} = \frac{\text{Consumption}}{DOSE_{AS} \times \text{Inhabitants} \times 365} \quad \text{Eq. 5}$$

529

530 Parameters used in Eq. 5:

Parameter	Description	Unit
$F_{PEN-REFINED}$	Refined fraction of a population receiving the active substance during a given time	[--]
Consumption	Consumption of active substance in geographic region per year	[mg year ⁻¹]
$DOSE_{AS}$	Maximum daily dose of the active substance consumed per inhabitant	[mg inh ⁻¹ d ⁻¹]
Inhabitants	Number of inhabitants in the region covered by the consumption data.	[inh]

531

532 Refinement of PEC_{SW} using metabolism data

533 If a potential risk for the medicinal product to the environment has been identified based on the total
 534 residue approach, then the total residue approach may be abandoned and the risk may be refined by
 535 subtracting the fractions of metabolites. If the total residue approach is abandoned, a full Phase II risk
 536 assessment is required for each metabolite constituting $\geq 10\%$ of the administered dose. The PEC is
 537 then calculated separately for the parent compound and these metabolites and all resulting PEC/PNEC
 538 ratios are summed for the evaluation of environmental risk of the product. If it is not possible to
 539 perform the ERA for the metabolites excreted in fractions $\geq 10\%$ of the dose, the total residue
 540 approach should be used. If a risk is identified and it is not possible to refine the risk by testing the
 541 metabolites, the ERA should be concluded with the statement that the use of the product is expected
 542 to result in a risk to the environmental compartment(s) concerned.

543 The following approach may be used for this refinement:

544

$$PEC_{SW-REFINED} = \frac{DOSE_{AS} \times F_{PEN} \times F_{EXCRETA}}{WASTE_{INHAB} \times DILUTION} \quad \text{Eq. 6}$$

545

546 Parameters used in Eq. 6:

Parameter	Description	Unit	Default value / reference
$PEC_{SW-REFINED}$	Predicted environmental concentration in surface water refined in Phase II Tier B	[mg L ⁻¹]	-
F_{PEN}	Fraction of a population receiving the active substance during a given time, from Tier A	[--]	See Eq. 1-3
$F_{EXCRETA}$	Fraction of substance excreted	[--]	-
$DOSE_{AS}$	Maximum daily dose of the active substance consumed per inhabitant	[mg inh ⁻¹ d ⁻¹]	-
$WASTE_{INHAB}$	Amount of wastewater per inhabitant per day	[L inh ⁻¹ d ⁻¹]	200
DILUTION	Dilution factor	[--]	10

547

548 Refinement of PEC_{SW} with STP modelling using the SimpleTreat model

549 Refinement of PEC_{SW} may also be performed by a model simulation using the latest version of
 550 SimpleTreat. (Download: https://www.rivm.nl/en/Topics/S/Soil_and_water/SimpleTreat; instruction:
 551 [https://www.umweltbundesamt.de/publikationen/application-of-simpletreat-40-in-european-](https://www.umweltbundesamt.de/publikationen/application-of-simpletreat-40-in-european-substance)
 552 substance) by incorporating:

- 553 • Adsorption of the active substance to sewage sludge in STPs, using the data from the estimation of
 554 the adsorption coefficient (OECD 106)
- 555 • Test for ready biodegradability in the STP (OECD 301)/measured removal rates using the OECD
 556 314 B study.

557 **Table 5:** Fate studies used in Phase II Tier B refinement of PEC_{SW}

Study	Endpoint	Guideline
<i>Fate properties (4.2.1.2)</i>		
Adsorption - Desorption Using a Batch Equilibrium Method in sludge and soil	K _{OC} _{SLUDGE} (L kg ⁻¹) K _{OC} _{SOIL} , K _d _{SOIL} (L kg ⁻¹)	OECD 106
Ready Biodegradability Test	Information if readily/not readily biodegradable	OECD 301

558

559 Calculation of emission of active substance per day

560 For local scale assessments, it is assumed that one point source is releasing its wastewater to one STP.
 561 The concentration in the influent of the STP, i.e. the untreated wastewater, can be calculated from the
 562 local release to wastewater and the influent flow to the STP. The influent flow equals the effluent
 563 discharge.

564

$$E_{local_WATER} = DOSE_{AS} \times F_{EXCRETA} \times F_{PEN} \times CAPACITY_{STP} \quad \text{Eq. 7}$$

565

566 Calculation of the STP influent concentration

567 For local scale assessments, it is assumed that one point source is releasing its wastewater to one STP.
 568 The concentration in the influent of the STP, i.e. the untreated wastewater, can be calculated from the
 569 local release to wastewater and the influent flow to the STP. The influent flow equals the effluent
 570 discharge.

571

$$C_{local_INF} = \frac{E_{local_WATER}}{WASTEW_{INHAB} \times CAPACITY_{STP}} \quad \text{Eq. 8}$$

572

573 Calculation of the STP-effluent concentration

574 The concentration of the effluent of the STP is given by the fraction directed to the effluent and the
 575 concentration in untreated wastewater as follows:

576

$$C_{local_EFF} = C_{local_INF} \times F_{stp_WATER} \quad \text{Eq. 9}$$

577

578 The fraction of the active substance discharged to the water phase in STP (F_{stp_WATER}) can be modelled
579 with SimpleTreat (current version 4.0). The model is used to estimate chemical emission from STPs
580 and exposure to surface water. The following input parameters are essential:

- 581
- Molecular mass, water solubility, vapour pressure (consideration of volatilization)
 - **Adsorption** of the active substance to sewage sludge in STPs, the K_{oc} values derived for sludge by the batch equilibrium method (OECD 106) is required. K_{oc} derived from soil or sediment cannot be considered. The lowest K_{oc} derived from sludge should be used ($n=2$). If 3 or more types of sludge are available ($n \geq 3$) the geometric mean can be used.
 - Biodegradation in activated sludge as input for Simple Treat can be estimated by three different methods:
 - 588 - Method 1: estimated from OECD/EU standardized biodegradability tests according to OECD 301
589 series, 310 or 302 series (recommended). The aquatic first order degradation constant
590 k_{biodeg} [h^{-1}] should be used.
 - 591 - Method 2: active substance is biodegradable in activated sludge batch test according to OECD
592 314B. The first order degradation constant k_{biodeg} [h^{-1}] valid for combined aqueous
593 phase/sludge should be used.
 - 594 - Method 3: active substance is biodegradable in activated sludge simulation test according to
595 OECD 303B. The first order degradation constant k_{biodeg} [h^{-1}] valid for aqueous phase should
596 be used.

597 No changes of the default values for the operational parameters of the sewage treatment (facility type:
598 municipal) are needed. In the output-sheet the distribution is given for four compartments:

- 599
- Air [%]
 - 600 • Water [%] = F_{stp_WATER} [%], needed for refinement of PEC_{SW}
 - 601 • Primary settler [%]
 - 602 • Surplus sludge [%]

603 F_{stp_SLUDGE} is the sum of primary settler and surplus sludge [%]

604 Calculation of the refined surface water concentration

605 The starting point for the calculation is the concentration of the active substance in the STP effluent.
606 Dilution in the receiving surface water and adsorption to suspended matter are then considered.

607 The partition coefficient between suspended matter and water, K_{p_SUSP} , may be estimated from the K_{oc}
608 of the active substance, determined for soil by taking into account different organic carbon contents of
609 the media. The lowest K_{oc} derived from soil should be used. If 4 or more soils are available the
610 geometric mean may be used. If K_d/K_f does not correlate with oc , the K_f/K_d –value should be used as
611 K_{p_SUSP} .

612

$$K_{p_SUSP} = F_{oc_SUSP} \times K_{oc_SOIL} \quad \text{Eq. 10}$$

613

$$FACTOR = 1 + K_{p_SUSP} \times SUSP_{WATER} \quad \text{Eq. 11}$$

614

$$PEC_{SW-REFINED} = \frac{C_{local_EFF}}{DILUTION \times FACTOR} \quad \text{Eq. 12}$$

615

616 Parameters used in Eq. 7-12:

Parameter	Description	Unit	Default value / reference
E_{local_WATER}	Local release rate to influent wastewater during episode	[kg d ⁻¹]	-
$DOSE_{AS}$	Maximum daily dose of the active substance consumed per inhabitant	[mg inh ⁻¹ d ⁻¹]	-
$F_{EXCRETA}^*$	Fraction of active substance excreted	[--]	-
F_{PEN}	Fraction of a population receiving the active substance during a given time	[--]	See Eq. 1-3
$CAPACITY_{STP}$	Capacity of the STP (inhabitants)	[inh]	10,000
C_{local_INF}	Concentration in untreated wastewater	[mg L ⁻¹]	-
$WASTE_{W_INHAB}$	Amount of wastewater per inhabitant per day	[L inh ⁻¹ d ⁻¹]	200
C_{local_EFF}	Concentration of active substance in the STP effluent	[mg L ⁻¹]	-
F_{stp_WATER}	Fraction of release directed to water by STP	[--]	See output sheet of SimpleTreat
K_{p_SUSP}	Solids/water partition coefficient for suspended matter	[L kg ⁻¹]	-
F_{OC_SUSP}	Fraction of organic carbon in suspended matter	[--]	0.1
K_{OC_SOIL}	Partition coefficient between organic carbon and water derived from soil	[L kg ⁻¹]	See Table 2
$FACTOR$	Factor taking the adsorption to suspended matter into account	[--]	-
$SUSP_{WATER}$	Concentration of suspended matter (dry weight)	[mg L ⁻¹]	15
$PEC_{SW-REFINED}$	Predicted environmental concentration in surface water refined in Phase II Tier B	[mg L ⁻¹]	-
$DILUTION$	Dilution factor	[--]	10

617 *This should include unchanged active substance and the fractions of dose excreted as metabolites unless the total residue approach
618 is abandoned

619

620 Risk characterisation621 The risk quotient (RQ) for the surface water is determined using the $PNEC_{SW}$ (equation 13).

622

$$RQ_{SW} = \frac{PEC_{SW-REFINED}}{PNEC_{SW}} \quad \text{Eq. 13}$$

623

624 If the RQ for surface water is < 1, it may be anticipated that the active substance in the medicinal
625 product will not pose a risk to the aquatic environment.

626 When a risk to the surface water ecosystem cannot be excluded, the applicant should propose
627 adequate precautionary and safety measures to protect surface water ecosystems (see also section 7).

628 4.2.4. Sediment

629 For the sediment risk assessment, PEC_{SED} is derived from PEC_{SW} as calculated in phase I (see equation
630 1-3) using equilibrium partitioning (EqP) between water and sediment consisting of freshly deposited
631 suspended matter. A $PNEC_{SED}$ is derived using tests with sediment dwelling organisms. Both PEC and
632 PNEC should be based on sediment with equal (normalized) organic carbon content and on a dry
633 weight basis.

634 4.2.4.1. Phase II Tier A assessment for sediment

635 Exposure assessment for sediment

636 Koc should be determined for a minimum of three soils (see section 4.2.1.2). If four or more Koc
637 values are available, then the geometric mean should be used. Otherwise, the highest Koc should be
638 used. If the adsorption to soil does not correlate with the organic carbon the solid-water partitioning
639 coefficient should be used as Kp_{SUSP} (highest $Kd = Kp_{SUSP}$).

640 **Table 6:** Fate study used in Phase II Tier A PEC_{SED} calculation

Study	Endpoint	Guideline
Fate properties (4.2.1.2)		
Adsorption - Desorption Using a Batch Equilibrium Method in soil	Koc_{SOIL} , Kd_{SOIL} [$L\ kg^{-1}$]	OECD 106

641

642 The concentration of the active substance in sediment is calculated according to equation 14.

643

$$644 \quad PEC_{SED} = \frac{K_{SUSP-WATER}}{RHO_{SUSP}} \times PEC_{SW} \times 1000 \quad \text{Eq. 14}$$

645

646 The partitioning coefficient between suspended matter and water is calculated according to equation
647 15.

648

$$649 \quad K_{SUSP-WATER} = F_{water_{SUSP}} + (F_{solid_{SUSP}} \times Kp_{SUSP} \times RHO_{SOLID} \times 10^{-3}) \quad \text{Eq. 15}$$

650

651 If the adsorption to soil does not correlate with the organic carbon the solid-water partitioning
652 coefficient should be used as Kp_{SUSP} (highest $Kd = Kp_{SUSP}$).

653

$$654 \quad Kp_{SUSP} = FOC_{SUSP} \times KOC_{SOIL} \quad \text{Eq. 16}$$

655

656

654

655 Parameters used in Eq. 14-16:

Parameter	Description	Unit	Default value
PEC _{SED}	Predicted environmental concentration in sediment related to wet weight	[mg kg ⁻¹ w.w.]	-
K _{SUSP-WATER}	Partitioning coefficient between suspended matter and water	[--]	See Eq. 15
RHO _{SUSP}	Density of suspended matter	[kg m ⁻³]	1,150
PEC _{SW}	Predicted environmental concentration in surface water calculated in Phase I	[mg L ⁻¹]	See Eq. 1-3
F _{water} _{SUSP}	Fraction of water in suspended matter	[--]	0.9
F _{solid} _{SUSP}	Fraction of solids in suspended matter	[--]	0.1
K _p _{SUSP}	Solids/water partition coefficient for suspended matter	[L kg ⁻¹]	See Eq.16
RHO _{SOLID}	Density of the solid phase	[kg m ⁻³]	2,500
F _{oc} _{SUSP}	Weight fraction of organic carbon in suspended solids	[kg kg ⁻¹]	0.1
K _{oc} _{SOIL}	Partition coefficient between organic carbon and water derived from soil	[L kg ⁻¹]	See Table 2. Determined using OECD 106

656

657 PEC_{SED} is related to **wet** sediment, which is expressed as freshly deposited suspended solid matter with
658 an organic carbon content of 10%. The PEC_{SED} based on dry weight is obtained by equation 17.

659

$$PEC_{SED_DW} = PEC_{SED} \times CONV_{SUSP}$$

660

$$PEC_{SED_DW} = \frac{PEC_{SED} \times RHO_{SUSP}}{F_{solid_SUSP} \times RHO_{SOLID}} \quad \text{Eq. 17}$$

661

$$PEC_{SED_DW} = PEC_{SED} \times 4.6$$

662

663 Parameters used in Eq. 17:

Parameter	Description	Unit	Default value / reference
PEC _{SED_DW}	Predicted environmental concentration in sediment related to dry weight	[mg kg ⁻¹ d.w.]	-
PEC _{SED}	Predicted environmental concentration in sediment related to wet weight	[mg kg ⁻¹ w.w.]	See Eq. 13
CONV _{SUSP}	Conversion factor	[kg _{ww} kg _{DW} ⁻¹]	4.6
RHO _{SUSP}	Bulk density of (wet) suspended matter	[kg m ⁻³]	1,150
F _{solid} _{SUSP}	Fraction of solids in suspended matter	[--]	0.1
RHO _{SOLID}	Density of the solid phase	[kg m ⁻³]	2,500

664

665 The fraction bound residue that may have been determined in fate studies, may not be subtracted
 666 from the PEC_{SED} .

667 **Effect assessment for sediment**

668 To determine a $PNEC_{SED}$, a minimum of one study with sediment dwelling organisms should be
 669 performed using a sediment-water test system (**Table 7**). In general, tests using a spiked sediment
 670 procedure are preferred. However, if the characteristics of the test substance make it impossible to
 671 spike sediment in a reliable manner (e.g. high water solubility, low binding affinity to sediment) it may
 672 be more appropriate to use the spiked water procedure.

673 For ionisable compounds, care should be taken that testing is performed at an environmentally
 674 relevant pH (5-9). For these compounds, a tailor-made approach may be followed if it can be
 675 substantiated and is well reported.

676 **Table 7:** Ecotoxicological standard tests with benthic species useful for the effect assessment in
 677 sediment

Study	Endpoint ^a	Guideline
Chironomid, spiked water/sediment	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 218/219
Chironomid, life-cycle study	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 233
<i>Lumbriculus sp.</i> , sediment-water toxicity	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 225

678 ^a EC10 values are preferred over NOECs in the risk assessment.

679

680 If data from a single chronic sediment test is available, an assessment factor of 100 should be applied
 681 to the EC10 or NOEC in order to derive the PNEC. If two long-term tests with species representing
 682 different living and feeding conditions are available, an assessment factor of 50 may be applied to the
 683 lowest EC10 or NOEC to obtain the $PNEC_{SED}$.

684 Results from sediment toxicity tests should be recalculated into a standard sediment with an organic
 685 carbon content of 10% (fraction of 0.1) according to Eq. 18.

686

$$EC10 \text{ or } NOEC_{ST\ SED} = EC10 \text{ or } NOEC_{TEST\ SED} \times \frac{FOC_{ST\ SED}}{FOC_{TEST\ SED}} \quad \text{Eq. 18}$$

687

688 Parameters used in Eq. 18:

Parameter	Description	Unit	Default value
$FOC_{ST\ SED}$	Fraction of organic carbon in standard sediment	[--]	0.1
$FOC_{TEST\ SED}$	Fraction of organic carbon in test sediment	[--]	-

689

690 **Risk characterization**

691 Using PEC_{SED} and $PNEC_{SED}$, the RQ for the sediment compartment is determined using equation 19.

692

$$RQ_{SED} = \frac{PEC_{SED}}{PNEC_{SED}} \quad \text{Eq. 19.}$$

693

694 If the risk quotient is ≥ 1 , risk refinement may be performed in Phase II - Tier B.

695 **4.2.4.2. Phase II Tier B assessment for sediment**

696 If a risk is identified in Tier A, refinement of PEC_{SW} (see section 4.2.3.2) may also be used for Tier B
697 sediment assessment. If a risk to sediment organisms still cannot be excluded, the applicant should
698 propose adequate precautionary and safety measures to protect sediment ecosystems (see also
699 section 7).

700 **4.2.5. Sewage Treatment Plant**

701 The functioning of STPs is essential for good water quality management. Substances with anti-
702 microbial activity may affect microbial communities. The-microbial community most likely exposed to
703 the highest concentrations of the substance(s) is the activated sludge community. In order to evaluate
704 the anti-microbial effects of anti-microbial-substances, the activated sludge respiration inhibition test
705 (OECD 209) should be used.

706 **4.2.5.1. Phase II Tier A assessment for STP**

707 Exposure assessment for STPs

708 To determine the risk for STPs, PEC_{SW} as calculated in phase I (see Eq. 1-3) should be recalculated into
709 a PEC_{STP} . This is achieved by multiplying the PEC_{SW} with a factor of 10, as there is no dilution of
710 effluent with surface water.

711 Effect assessment for STP

712 The PNEC is based on the respiration inhibition test for activated sludge (OECD 209), by applying an
713 assessment factor of 10 to the EC10 or NOEC value.

714 **Table 8:** Ecotoxicological study used in the effect assessment for STP

Study	Endpoint ^a	Guideline
<i>Functioning of STP</i>		
Activated sludge, respiration inhibition	EC10 or NOEC [mg L^{-1}]	OECD 209

715 ^a EC10 values are preferred over NOECs in the risk assessment.

716

717 Risk characterisation

718 Using the $PNEC_{MICROORGANISMS}$, the risk quotient (RQ) for the STP is determined (equation 20).

719

$$RQ_{MICROORGANISMS} = \frac{PEC_{STP}}{PNEC_{MICROORGANISMS}} \quad \text{Eq. 20}$$

720

721 When the risk quotient is ≥ 1 , risk refinement options as described for surface water may be used in
722 Phase II Tier B.

723 **4.2.5.2. Phase II Tier B assessment for STP**

724 The exposure concentration in the aeration tank of the SimpleTreat model ($PEC_{\text{AERATION TANK}}$) should be
725 used to refine the risk quotient for microorganisms. $PEC_{\text{AERATION TANK}}$ is equal to $C_{\text{local EFF}}$, see also Eq. 9
726 in 4.2.3.2.

727 Explanation of Parameters:

Parameter	Description	Unit	Default value/ Reference
PEC_{STP}	Predicted environmental concentration in the STP effluent	[mg L ⁻¹]	-
$PEC_{\text{AERATION TANK}}$	Predicted environmental concentration in the aeration tank of the sewage treatment plant.	[mg L ⁻¹]	Equal to $C_{\text{local EFF}}$ (see Eq. 7)

728

729 **4.2.6. Groundwater**

730 Entry into the groundwater is considered to be via bank filtration, except for substances with an
731 average $K_{oc} > 10,000 \text{ L kg}^{-1}$ or for substances that are readily biodegradable. It is assumed that the
732 exposure of groundwater via sewage sludge incorporated into soil can be disregarded with reference to
733 the high sorption affinity of these active substances to the soil.

734 **4.2.6.1. Phase II Tier A assessment for groundwater**

735 Exposure assessment for groundwater

736 The groundwater PEC (PEC_{GW}) is based on the PEC_{SW} as calculated in phase I (see eq. 1-3) and is
737 estimated by a simple equation.

738

$$PEC_{\text{GW}} = 0.25 \times PEC_{\text{SW}} \quad \text{Eq. 21}$$

739

740 Effect assessment for groundwater

741 The $PNEC_{\text{GW}}$ is based on the $PNEC_{\text{SW}}$ (see 4.2.3.1) and an additional assessment factor. Groundwater
742 ecosystems are fundamentally different to surface water ecosystems and therefore may be more
743 vulnerable as they lack the ability to recover from perturbations. Consequently, an additional
744 assessment factor of 10 should be applied to extrapolate the $PNEC_{\text{GW}}$ from the $PNEC_{\text{SW}}$ (Eq. 22 below).

745

$$PNEC_{\text{GW}} = \frac{PNEC_{\text{SW}}}{10} \quad \text{Eq. 22}$$

746

747 **Risk characterization**

748 The risk quotient (RQ) for the groundwater compartment is determined using the PNEC for
749 groundwater (equation 23).

750

$$RQ_{GW} = \frac{PEC_{GW}}{PNEC_{GW}} \quad \text{Eq. 23}$$

751

752 If the risk quotient is ≥ 1 , risk refinement options should be used in Phase II Tier B as described
753 below.

754 **4.2.6.2. Phase II Tier B assessment for groundwater**

755 If the RQ_{GW} is ≥ 1 , further evaluation is needed in Tier B using one or more of the options below.

- 756 • Calculate the PEC_{SW} , refined as described in chapter 4.2.3.2.
- 757 • Groundwater modelling for a realistic worst case scenario according to SiMBaFi – a bank filtration
758 simulation model. The model and a detailed description can be downloaded here:
759 www.uba.de/simbafi

760 The following parameters are needed:

- 761 • $PEC_{SW-REFINED}$ as described in section 4.2.3.2.
- 762 • Adsorption of the active substance to soil derived from batch equilibrium test (OECD 106). SiMBaFi
763 requires the non -oc-normalized K_d or K_f – value (K_f - Freundlich adsorption coefficient) as input.
764 The lowest K_d/K_f derived from soil should be used ($n=3$). If 4 or more soils are available the
765 geometric mean may be used. K_d derived from sludge cannot be used.
- 766 • Degradation as DT 50 value derived from an OECD 308 study (total system, calculated using single
767 first order kinetics, normalised to 12°C, highest value of 2 test systems).

768 **Table 9:** Fate studies used for groundwater risk assessment

Study	Endpoint	Guideline
Fate properties (4.2.1.2)		
Adsorption - Desorption Using a Batch Equilibrium Method in soil	K_{dSOIL}/K_{fSOIL} [L kg ⁻¹]	OECD 106
Aerobic Transformation in Aquatic Sediment Systems	DT50 value (total system, SFO, 12°C normalisation, highest value of 2 test systems)	OECD 308

769

770 For the calculation of the PEC_{GW} the “realistic worst case” determined in SiMBaFi should be used, i.e. a
771 groundwater flow time of 5 days between the surface water and the groundwater well. For calculation
772 four steps are needed as described below:

773 Calculation of retardation:

$$Rf = 1 + \left(\frac{1-n}{n}\right) \times \rho_s \times K_{dSOIL} \quad \text{Eq. 24}$$

774

775 Calculation of flow time for the active substance

776 SiMBaFi combines the calculation of active substance transport velocity and transport time for the
777 active substance for the distance between bank line and production well to the following equation (eq.
778 25):

779

$$t_{AS} = t_{GW} \times Rf \quad \text{Eq. 25}$$

780

781 Calculation of concentration at production well

782 This step considers elimination by biological degradation of the active substance during their transport
783 from the surface water to the production well with an exponential equation (eq. 26):

784

$$PEC_{PRODUCTION\ WELL} = PEC_{SW-REFINED} \times e^{\left(\frac{-\ln 2}{DT_{50}} \times t_{as}\right)} \quad \text{Eq. 26}$$

785

786 As the percentage of bank filtrate at the production well is assumed to be 100 % the resulting PEC_{GW}
787 equals the calculated concentration in the production well (eq. 27).

788

$$PEC_{GW-REFINED} = PEC_{PRODUCTION\ WELL} \quad \text{Eq. 27}$$

789

790 Parameters used in Eq. 24-27:

Parameter	Description	Unit	Default value / Reference
Rf	Retardation factor	[--]	-
n	Porosity – the default value is typical for an aquifer composed of sand and gravel	[--]	0.35
ρ_s	Solid density – the default value representing characteristic density for quartz as the main component of porous aquifer systems.	[g cm ⁻³]	2.65
Kd_{SOIL} / Kf_{SOIL}	Adsorption coefficient (not oc normalized)	[L kg ⁻¹]	See Table 2. Determined using OECD 106
t_{AS}	Flow time of the active substance	[d]	-
t_{GW}	Groundwater flow time - the default value representing a realistic worst case for flow time between surface water and well	[d]	5
$PEC_{PRODUCTION\ WELL}$	Predicted environmental concentration at production well	[mg L ⁻¹]	-
$PEC_{SW-REFINED}$	Predicted environmental concentration in surface water, refined in Phase II Tier B	[mg L ⁻¹]	See 4.2.3.2
DT50	Half-life for biological transformation, water/sediment total system:	[d]	-
$PEC_{GW-REFINED}$	Predicted environmental concentration in the groundwater after entry by bank filtration, refined in Phase II Tier B	[mg L ⁻¹]	-

791

792 Risk characterisation

793 The refined RQ_{GW} should be recalculated using the refined PEC_{GW} and the PNEC value from Phase II
794 Tier A.

795 When a risk to the groundwater ecosystem cannot be excluded, the applicant should propose adequate
796 precautionary and safety measures to protect groundwater ecosystems (see section 7).

797 **4.2.7. Soil**

798 A combined trigger for the soil compartment (see 4.2.2 and **Table 3**) aims to ensure a soil assessment
799 for substances with high release to the sewage treatment plants, even if the adsorption is lower than a
800 K_{oc} value of 10 000 L kg^{-1} indicates.

801 To determine a possible risk to the soil compartment, the PEC_{SOIL} is compared to the $PNEC_{SOIL}$. This
802 $PNEC_{SOIL}$ is derived using experimental long-term ecotoxicity data for soil microorganisms, soil dwelling
803 invertebrates and plant species (**Table 11**). Since sludge associated active pharmaceutical residues
804 may be available in soil compartment for a long time, short-term effect tests are inappropriate for risk
805 assessment. When the $PEC/PNEC$ ratio is ≥ 1 , a risk to the entire soil compartment (not a particular
806 sensitive group of species) is indicated. If a risk is identified in Phase II Tier A, a refined assessment
807 may be performed in Phase II Tier B.

808 **4.2.7.1. Phase II Tier A assessment for soil**

809 **Tier A Exposure assessment for soil**

810 The Tier A exposure assessment considers sludge application as the major entry path for the active
811 substance to be released to the soil environment. In a first step, the initial concentration in soil after
812 the first application is calculated using the predicted concentration of the active substance in sludge.
813 For substances which accumulate and are not easily degraded, the concentration in soil after repeated
814 sludge application should also be assessed. In order to consider the biodegradation of the active
815 substance in soil in between sludge applications a study on degradation in soil (OECD 307) is required.

816 **Table 10:** Fate studies used in Phase II Tier A exposure assessment for soil

Study	Endpoint	Guideline
Adsorption - desorption using a Batch Equilibrium Method in sludge	$K_{ocSLUDGE}$ [L kg^{-1}]	OECD 106
Degradation in soil*	DT50 [d]	OECD 307

817 * In case three soils or more were tested in OECD 307, using the geometric mean DT50 value is appropriate. In
818 case of fewer soils were tested the highest value should be used as DT50 in the calculation. Studies must reflect
819 environmental temperatures in Europe and therefore preferably be conducted at 12°C or extrapolation of
820 degradation half-lives to 12°C should be considered. See section 5.2.2.1 for more information.

821

822 Concentration in soil after the first sludge application

823 The initial concentration of the active substance in soil (PEC_{SOIL}) after the first sludge application ($t=0$)
824 is shown in Equation 28. The default mixing depth and sludge application rates are in compliance with
825 the procedure in the ECHA Environmental Assessment (R16) (EU, 2016).

826

$$PEC_{SOIL} = \frac{C_{SLUDGE} \times Appl_{SLUDGE}}{Depth \times Density} \quad \text{Eq. 28}$$

827
828 The concentration in sewage sludge (C_{sludge}) is calculated using equation 29.
829

$$C_{\text{SLUDGE}} = \frac{F_{\text{stpSLUDGE}} \times E_{\text{localWATER}}}{\text{Sludgerate}} \times 1000000 \quad \text{Eq. 29}$$

830
831 Parameters used in Eq. 28-29:

Parameter	Description	Unit	Default value/Reference
PEC _{SOIL}	Predicted environmental concentration in soil after the first application	[mg kg ⁻¹ w.w.]	-
C _{SLUDGE}	Concentration in sludge	[mg kg ⁻¹ w.w.]	-
Appl _{SLUDGE}	Yearly sludge application rate	[kg m ⁻²]	0.5
Depth	Mixing depth	[m]	0.2
Density	Bulk density of wet soil	[kg m ⁻³]	1,700
F _{stpSLUDGE}	Fraction found in sludge	[--]	Calculated by SimpleTreat using K _{OC_{SLUDGE}} , see also Table 2
E _{localWATER}	Local release rate to influent wastewater during episode	[kg d ⁻¹]	See Eq. 7, with F _{EXCRETA} = 1
Sludgerate	Rate of sewage sludge production	[kg d ⁻¹]	710*

832 *Default value taken from the ECHA Exposure Assessment Guideline (R16) (EU, 2016).

833 The emission rate to influent wastewater (E_{localWATER}) of the active substance is estimated by Eq. 7
834 using a default value of 1 for F_{EXCRETA}.

835 Long-term accumulation in soil

836 If the active substance is not easily degraded, it may accumulate in soil over time resulting from
837 repeated sludge application. It will continue to accumulate until a steady state level is reached. The
838 number of years to reach steady state depends on the half-life of the substance. The concentration in
839 the steady-state year can be calculated by equation 30.

$$PEC_{\text{SOIL(SS)}} = \frac{PEC_{\text{SOIL}}}{1 - F_{\text{acc}}} \quad \text{Eq. 30}$$

841
842 The fraction accumulating after one year is calculated by Eq 31.

$$F_{\text{acc}} = e^{-365 \times k} \quad \text{Eq. 31}$$

844
845 The first rate removal rate can be calculated if the removal rates for degradation, leaching and
846 volatilisation are known, i.e. $k = k_{\text{VOLAT}} + k_{\text{LEACH}} + k_{\text{BIODEGRADATION}}$.

847 However, removal by volatilisation and leaching ($k_{\text{VOLAT}} + k_{\text{LEACH}}$) may be disregarded assuming that
848 biodegradation is the main removal constant. Otherwise, guidance for calculating $k_{\text{VOLAT}} + k_{\text{LEACH}}$ may

849 be found in ECHA Exposure Assessment (Equations R16-47 and R16-48) (ECHA, 2016). The removal
 850 by biodegradation is calculated by Eq. 32.

851

$$k_{\text{BIODEGRADATION}} = \frac{\ln 2}{DT50} \quad \text{Eq. 32}$$

852

853 Parameters used in Eq. 30-32:

Parameter	Description	Unit	Default value
PEC _{SOIL(SS)}	Predicted environmental concentration in soil in a steady-state situation	[mg kg ⁻¹ w.w.]	-
PEC _{SOIL}	Predicted environmental concentration in soil after the first application	[mg kg ⁻¹ w.w.]	See Eq.28
Facc	Fraction accumulating in soil over one year	[--]	-
k	First rate removal (dissipation) rate from soil	[d ⁻¹]	-
DT50	Half-life for biodegradation in soil	[d]	-

854

855 PEC_{SOIL} is related to **wet** soil. The PEC_{SOIL} based on dry weight is obtained by equation 33.

856

$$PEC_{\text{SOIL}_{\text{DW}}} = PEC_{\text{SOIL}} \times CONV_{\text{SOIL}} =$$

857

$$PEC_{\text{SOIL}_{\text{DW}}} = \frac{PEC_{\text{SOIL}} \times RHO_{\text{SOIL}}}{F_{\text{solid}_{\text{SOIL}}} \times RHO_{\text{SOLID}}} = \quad \text{Eq. 33}$$

858

$$PEC_{\text{SOIL}_{\text{DW}}} = PEC_{\text{SOIL}} \times 1.13$$

859

860 Parameters used in Eq. 33:

Parameter	Description	Unit	Default value / reference
PEC _{SOIL_DW}	Predicted environmental concentration in soil related to dry weight	[mg kg ⁻¹ d.w.]	
PEC _{SOIL}	Predicted environmental concentration in soil related to wet weight	[mg kg ⁻¹ w.w.]	See Eq. 28 and 30
CONV _{SOIL}	Conversion factor	[kg _{ww} kg _{DW} ⁻¹]	
RHO _{SOIL}	Bulk density of wet soil	[kg m ⁻³]	1,700
Fsolid _{SOIL}	Fraction of solids in soil	[--]	0.6
RHO _{SOLID}	Density of the solid phase	[kg m ⁻³]	2,500

861

862 Tier A Effect Assessment for soil

863 Four tests on different trophic levels are required for the soil compartment, including a functional test
 864 with soil microorganisms and ecotoxicological tests with soil dwelling invertebrates and plant species

865 (**Table 11**). The long-term toxicity to soil organisms should be assessed as active substances in soils
 866 may persist for a long time, or accumulation of the substance may occur when sludge is applied over
 867 consecutive years. The PNEC_{soil} is calculated by applying an assessment factor (AF) of 10 to the lowest
 868 EC10 or NOEC value from the soil test species.

869 **Table 11:** Ecotoxicological studies used in the risk assessment for soil organisms

Study	Toxicity endpoint ^a	Guideline
Nitrogen Transformation (28 days)*	< 25% of control**	OECD 216
Terrestrial plants***	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 208
Earthworm / Enchytraeid	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 222/OECD
Collembola	EC10 or NOEC [mg kg ⁻¹ dry weight]	OECD 232

870 * Studies should be conducted at 1X and 10X the maximum PEC.

871 ** An assessment factor is not relevant to this endpoint – when the difference in rates of nitrate formation between the lower
 872 treatment (i.e. the maximum PEC) and control is equal to or less than 25% at any sampling time before day 28, the active
 873 ingredient can be evaluated as having no long-term influence on nitrogen transformation in soils.

874 ***Six plant species from six different families should be tested. It is highly recommended to use species belonging to six different
 875 families of four dicotyledonous (including a Brassica species) and two monocotyledonous species, which represent the types of
 876 plants grown on agricultural land, which would receive a sludge application.

877 ^a EC10 values are preferred over NOECs in the risk assessment.

878

879 Risk characterisation

880 Using the appropriate PEC_{SOIL} and the PNEC_{SOIL}, the RQ for the soil compartment is determined by
 881 equation 34.

882

$$RQ_{SOIL} = \frac{PEC_{SOIL}}{PNEC_{SOIL}} \quad \text{Eq. 34.}$$

883

884 If the risk quotient is ≥ 1 , the risk assessment proceeds to Phase II – Tier B.

885 4.2.7.2. Phase II Tier B Assessment for soil

886 Tier B Exposure assessment for soil

887 If a risk for soil organisms has been identified in Tier A, it is possible to refine the emission rate to
 888 influent wastewater by using consumption data and metabolism data as performed in Tier B for surface
 889 water (see 4.2.3.2).

890 The refined emission rate to influent wastewater is used to recalculate the sludge concentration C_{SLUDGE}
 891 and the relevant PEC_{SOIL}, as described above for Tier A.

892 Tier B Effect Assessment for soil

893 If the RQ_{SOIL} from nitrogen transformation in Tier A is still ≥ 1 , further evaluation of the PNEC may be
 894 possible in Tier B by extending the microorganisms Nitrogen Transformation Test (OECD 216) to 100
 895 days (**Table 12**).

896 **Table 12:** Effect studies used for Tier B assessment for soil organisms

Study	Endpoint	AF	Guideline
Nitrogen Transformation (100 days – extension of Tier A study)	≤ 25% of control	*	OECD 216

897 * An assessment factor is not relevant to this endpoint – when the difference in rates of nitrate formation between the lower
 898 treatment (i.e., the maximum PEC) and control is ≤ 25% at any sampling time before day 100, the substance can be evaluated as
 899 having no long-term influence on nitrogen transformation in soils.

900 **Risk characterisation**

901 The refined RQ_{SOIL} should be recalculated using the refined PEC_{SOIL} and the refined PNEC value if
 902 applicable. If a risk to the soil ecosystem cannot be excluded at this stage, the applicant should
 903 propose adequate precautionary and safety measures to protect soil ecosystems (see also section 7).

904 **4.2.8. Secondary poisoning**

905 Secondary poisoning is a toxic effect on birds and mammals resulting from consumption of
 906 contaminated prey (fish or other aquatic organisms). It is relevant for compounds that accumulate
 907 through the food chain, mainly lipophilic compounds. Thus, when $\log Kow$ is ≥ 3 , the potential for
 908 secondary poisoning should be evaluated. First, a bioconcentration factor in fish (BCF_{FISH}) should be
 909 determined experimentally (**Table 13**). It should be noted that a lack of accumulation in mammals
 910 does not exclude a potential for accumulation in fish and other aquatic species. Accumulation may
 911 occur as a result of decreased activity of enzymes involved in the transformation of xenobiotics in fish
 912 and/or lower trophic levels, differences in exposure routes (e.g. air via lungs vs. water via gills),
 913 differences in metabolism, different excretion routes, etc.

914 When the BCF_{FISH} is $> 100 \text{ L kg}^{-1}$, the potential for secondary poisoning should be further assessed
 915 using a calculation method. The BCF_{FISH} , together with mammalian toxicity data from the non-clinical
 916 safety assessment of the active substance are used to derive a $PNEC_{BIOTA}$. No further experimental
 917 work in mammalian species is requested. When mammalian toxicity data are not available further
 918 assessment (i.e. calculation of a $PNEC_{BIOTA}$) can be waived.

919 When BCF_{FISH} is > 2000 , the B-criterion according to **Table 16** (PBT assessment) is fulfilled. In this
 920 case, it should also be checked whether the T-criterion (**Table 16**) is fulfilled. In this case, the P-
 921 criteria (**Table 16**) should be also assessed, either by using the study on degradation in soil (if soil
 922 assessment was triggered) or by performing an aquatic degradation study (OECD 308 or 309). In case
 923 of a BCF-value > 5000 , degradation should be assessed using the vP criteria (**Table 16**).

924 Bioconcentration factor

925 The BCF is determined in fish using the OECD 305 test guideline (these results may also be used for
 926 the PBT assessment, see section 5.2). Aqueous exposure is the preferred methodology when
 927 technically feasible because dietary exposure yields a biomagnification factor (BMF) rather than a BCF,
 928 which then should be estimated from the depuration rate constant. The kinetic calculation of BCF
 929 (based on uptake and elimination rates and taking dilution due to fish growth into account) is preferred
 930 over the steady state calculation (based on concentrations in fish and water) and BCF values should be
 931 normalized to 5% lipid content. A minimized study design is also described in OECD 305 but this may
 932 only be used for screening purposes. It may not be used to determine an accurate BCF value because
 933 it cannot be determined whether steady state is reached (see OECD guidance document No. 264, 2017
 934 for additional information).

935 **Table 13:** Trigger for secondary poisoning assessment

Study	Endpoint	Guideline	Trigger for further assessment of secondary poisoning
Bioaccumulation in fish	$BCF_{FISH} [L\ kg^{-1}]$	OECD 305	100

936

937 Input values

938 Inputs for the calculation of secondary poisoning potential are the BCF_{FISH} and the most relevant
 939 mammalian toxicity data from the non-clinical part of the dossier, i.e. preferably the lowest no
 940 observed adverse effect level (NOAEL) from a chronic repeat-dose toxicity study (minimum of 28 days)
 941 in the most sensitive species. This NOAEL is converted to a no-effect-concentration in food, (NOEC).
 942 This NOEC may be normalised to the caloric content in food according to the Water Framework
 943 Directive EQS (European Communities, 2018), and is then used to derive a $PNEC_{BIOTA}$. When only acute
 944 studies are available an additional assessment factor is applied to the derivation of the $PNEC_{BIOTA}$ (see
 945 ECHA, 2017c; European Communities, 2011) for guidance).

946 Calculation of secondary poisoning potential

947 $PNEC_{BIOTA}$ may be converted into a $PNEC_{SW, SECPOIS}$ by dividing it by the BCF_{FISH} and BMF. Using this
 948 approach, when the $PNEC_{SW, SECPOIS}$ is higher than the PEC_{SW} , a risk due to secondary poisoning is
 949 identified.

950 Alternatively, the risk of secondary poisoning for predators in the aquatic food chain may be calculated
 951 as the ratio of the concentration of the contaminant in the predator's food (PEC_{BIOTA}) and the no-effect-
 952 concentration for the oral intake ($PNEC_{BIOTA}$). If this risk quotient is ≥ 1 , a risk of secondary poisoning is
 953 identified. PEC_{BIOTA} is then derived from PEC_{SW} multiplied by BCF_{FISH} (experimental data) and BMF
 954 (default value). The BMF is defined as the relative concentration in a predator compared to the
 955 concentration in its prey ($C_{PREDATOR}/C_{PREY}$). The default BMF value is based on the experimental BCF_{FISH}
 956 and derived according to (ECHA, 2017c, ECHA, 2016 and Water Framework Directive EQS (European
 957 Communities, 2011)).

958 **4.3. Tailored assessment for active substances with a specific mode of**
 959 **action**

960 For certain groups of active substances, a tailored assessment is required for the aquatic compartment
 961 due to their specific mode of action. This concerns compounds for which the action limit does not
 962 apply, such as endocrine active substances (see section 4.3.2), but may also concern compounds for
 963 which the action limit applies, such as antibiotics (see section 4.3.1).

964 For all active substances that require a tailored risk assessment, an ERA Phase II assessment is
 965 required for all compartments, including fate aspects. For the aquatic compartment, OECD ecotoxicity
 966 tests are available for a number of species that may replace standard test species, depending on the
 967 mode of action. For soil and sediment, tailoring with regard to the choice of test species is often not
 968 possible.

969 **4.3.1. Antibiotics**

970 For active substances with an antibacterial mode of action, and no other known pharmacological
 971 targets, a targeted effect assessment should be performed for the aquatic compartment. Scientific
 972 knowledge and empirical data demonstrate that a tailored risk assessment focused on the effects on

973 lower trophic levels including bacteria, algae and aquatic invertebrates is sufficiently sensitive for
974 antibacterials and fish tests are not required.

975 **Table 14** lists the required studies for active substances with an antibacterial mode of action in Tier A.

976 **Table 14:** Required tests in the tailored Tier A assessment for active substances with an antibacterial
977 mode of action

Test	Test species [§]	Endpoint*
OECD 201	<i>Anabaena flos-aquae</i> (Cyanobacteria)	EC10 or NOEC
OECD 201	<i>Synechococcus leopoliensis</i> (Cyanobacteria)	EC10 or NOEC
OECD 201	<i>Raphidocelis subcapitata</i> # (Green algae)	EC10 or NOEC
OECD 211	<i>Daphnia magna</i> (Invertebrate)	EC10 or NOEC

978 [§] The test species recommended in the OECD 201 may be replaced by other species within the same taxonomic group provided it is
979 scientifically and practically justified

980 *For the OECD 201 test, the average specific growth rate is the relevant endpoint to use. The culture should be in exponential
981 growth during all time intervals of the experiment. For the OECD 211, various endpoints (e.g., related to survival or reproduction)
982 are relevant. For both tests: The EC10 value is preferred over the NOEC value if a reliable dose/response curve is generated with
983 concentrations around the EC10 and is hence used for the PNEC derivation when both are available.

984 # *Raphidocelis subcapitata* formerly known as *Pseudokirchneriella subcapitata*

985

986 4.3.2. Endocrine active substances (EAS)

987 Some drug substances may affect the reproduction or development of vertebrate or lower animals at
988 concentrations < 0.01 µg/L. Many studies on the endocrine system published in the peer-reviewed
989 literature document that endogenous hormones can act in vivo at concentrations as low as pg/L.
990 Changes of developmental and reproductive parameters can be major drivers of alterations in
991 population growth. EAS particularly affect developmental and reproductive properties and effects on
992 these parameters are of particular relevance when assessing environmental risk.

993 **Identification of EAS**

994 If there is evidence that the active substance can exert an effect on development or reproduction by
995 directly interacting or interfering with receptors, hormone levels or activities of oestrogens, androgens
996 or other steroid hormones, that active substance should be assessed in Phase II regardless of the
997 predicted environmental concentration. A tailored risk assessment that addresses its specific
998 mechanism of action should be used.

999 An active substance whose intended pharmacological action targets the endocrine system as described
1000 above is considered to be an EAS and should be assessed in Phase II using a tailored risk assessment.

1001 For other active substances, information on potential non-intended endocrine activity should be
1002 obtained from the respective part of the dossier. This includes both in vitro and in vivo information.
1003 Endocrine-related effects relevant for identification of an EAS include agonism, antagonism and
1004 modulation of steroid receptors, steroid hormone levels and changes in steroidogenic tissues (adrenals
1005 and gonads), steroidogenic enzyme inhibition and direct interaction with the hypothalamic–pituitary–
1006 gonadal axis. The following information should be evaluated using a weight of evidence approach to
1007 decide if the substance should be considered to be an EAS and assessed in Phase II using a tailored
1008 risk assessment:

1009 In vitro data

1010 • EC50/IC50 in agonist or antagonist mode at levels < 1µM at steroid hormone receptors

1011 • IC50 at levels below 1µM for inhibition of steroidogenic enzymes

1012 In vivo data

1013 • Endocrine-related adverse effects at the lowest observed adverse effect level (LOAEL) in pivotal
1014 toxicology, carcinogenicity or reproductive toxicology studies

1015 Changes in steroid hormone levels and changes in steroidogenic tissues (adrenals and gonads) in
1016 mammals are considered to be relevant effects. Other relevant effects can include decreases in sperm
1017 function and reproductive capability, premature or delayed puberty, changes in oestrous cycles,
1018 carcinogenicity in endocrine organs and mammary glands and changes in developmental landmarks, if
1019 there is evidence of an endocrine mode of action. An integrated assessment with awareness of
1020 possible species-specific effects that do not predict environmental risk is expected. As examples,
1021 effects secondary to the role of inhibition or induction of drug metabolising isozymes or
1022 dopaminergic/anti-dopaminergic effects on the hypothalamo-prolactin axis would generally not be
1023 regarded as mechanisms which would warrant evaluation as an EAS.

1024 Evidence from other sources

1025 Evidence from scientific literature may be used. Relevant information on altered parameters includes
1026 effects on reproduction such as intersex, sex ratio and feminisation or masculinisation of fish; effects
1027 on spawning for molluscs; developmental effects on invertebrates, amphibia and/or fish. Where the
1028 evidence demonstrates that endocrine adverse effects would be expected at levels below 0.01 µg/L,
1029 the active substance should be further assessed as an EAS and the trigger value does not apply.

1030 **Tailored testing of EAS**

1031 For all EAS, the assessment depends on the mode of action (MoA) of the compound. If it can be
1032 scientifically justified, the effect assessment may be tailored to specific groups of organisms of the
1033 aquatic compartment, e.g. fish and/or amphibians. A Phase II assessment should be performed
1034 irrespective of the PEC action limit. Studies on environmental fate are required for all EAS. However,
1035 waiving of some effect tests may be applicable according to MoA, e.g. focus on specific long-term fish
1036 tests and, with justification, not include activated sludge and/or algae.

1037 In addition to substances identified as EAS, a tailored risk assessment should also be performed for
1038 active substances where the scientific literature shows evidence of endocrine adverse effects at
1039 concentrations near or above the predicted PEC_{SW} as evidenced e.g. by intersex, sex ratio,
1040 feminisation or masculinisation, or effects at the population level in fish or amphibians. This
1041 information should be used for selecting the most appropriate chronic ecotoxicity study.

1042 A fish early life stage test (OECD 210) may not provide the most relevant ecotoxicological information
1043 for EAS since this test is rather short and it does not cover the relevant life stages like sexual
1044 maturation and reproduction. Thus, the design of a study should include the appropriate exposure
1045 time, the sensitive life-stage(s) and the relevant endpoints necessary to detect adverse effects and
1046 underlying modes of action.

1047 A tiered testing strategy should be followed, e.g., an in vivo screening test (OECD 229 or OECD 230)
1048 may be performed if effects on the oestrogen or androgen receptor are expected. These tests also
1049 evaluate secondary sexual characteristics in fathead minnow or medaka (OECD 229 or 230) or gonad
1050 histopathology (OECD 229). As stated in the test guidelines, both are screening tests only, and are
1051 therefore not suitable for a quantitative risk assessment. In case it is already known from e.g.

1052 mammalian toxicity studies that estrogenic or androgenic receptors are targeted, the screening assay
 1053 (OECD 229 or 230) will become redundant. If effects are observed in such a test, long-term adverse
 1054 effects should then be characterised in a fish sexual development test or a fish full life cycle test. Even
 1055 if the mode of action is known, it may still be necessary to perform a fish full life cycle test, for
 1056 instance, when the screening or partial lifecycle tests do not cover all endpoints or life stages, which
 1057 are at risk. If the mode of action or the most sensitive endpoints are not known, a fish full life cycle
 1058 study should be performed.

1059 The table below summarises tests that may be appropriate for different MoA. The applicant should
 1060 develop a test proposal based on MoA considerations, possibly covering test species other than those
 1061 listed below.

1062 **Table 15:** Overview of recommended effect studies for active substances with an endocrine
 1063 mechanism of action and thyroid hormone agonist and antagonists

Mechanism of Action	Recommended Effect Test
Oestrogen Receptor Agonistic	Fish full life-cycle test (DRP no. 95 / OECD 240)
Oestrogen Receptor Antagonistic	Fish sexual development test (OECD 234) or Fish full life-cycle test (DRP no. 95 / OECD 240)
Androgen Receptor Agonistic	Fish sexual development test (OECD 234) or Fish full life-cycle test (DRP no. 95 / OECD 240)
Androgen Receptor Antagonistic	Fish full life-cycle test (DRP no. 95 / OECD 240)
Aromatase Inhibition	Fish sexual development test (OECD 234) or Fish full life-cycle test (DRP no. 95 / OECD 240)
Thyroid hormone agonists and antagonists ^a	Larval amphibian growth and development assay (OECD 241)
Other mechanisms are subject to expert judgement	

1064 ^a: Although not covered by the definition for EAS, tailored testing of thyroid hormone agonists and antagonists is recommended.
 1065

1066 It may be appropriate to conduct a range finding study to determine the appropriate concentrations of
 1067 drug substance to use in the definitive study.

1068 If there is still uncertainty as to which test is most appropriate based on the possible mode(s) of action
 1069 of compound the applicant is encouraged to seek scientific advice regarding the detailed study design,
 1070 particularly before conducting fish or amphibian tests.

1071 5. PBT assessment

1072 PBT /vPvB substances are substances which will bioaccumulate in organisms and persist in the
 1073 environment. Due to their physico-chemical characteristics, it is not possible to predict the
 1074 environmental fate of these substances or the kind of adverse effects that could occur over long
 1075 periods of time. Chronic exposure and long term cumulative adverse effects may lead to uncertainty
 1076 when calculating the PEC via established exposure models, and/or establishing the PNEC from standard
 1077 laboratory tests. Because the PBT assessment is a hazard assessment, every active substance should
 1078 be assessed for its PBT properties regardless of its PEC. A tiered PBT testing strategy should be
 1079 followed, beginning with a screening step in Phase I (determination of log Kow), followed by a

1080 definitive assessment in Phase II when the trigger value of log Kow > 4.5 is met. The definitive
1081 assessment consists of sequentially testing and evaluating persistence, then bioaccumulation, then
1082 toxicity.

1083 Annex XIII of the REACH regulation (Regulation (EC) No 1907/2006) lays down the criteria for the
1084 identification of PBT and vPvB substances (see **Table 16**). To ensure a harmonised approach, these
1085 criteria together with the methodology in the current REACH guidance on PBT-assessment (Guidance
1086 on information requirements and chemical safety assessment Chapter R.11: PBT Assessment and
1087 Chapters R7.a, 7.b, and R7.c on endpoints specific guidance) (ECHA 2017 a-d) should be followed. The
1088 REACH guidance documents may be obtained from the ECHA website.

1089 For substances for which a Phase II risk assessment including assessment of the soil compartment is
1090 performed, no additional testing is required for the PBT assessment. Otherwise, a simulation
1091 degradation study in soil, water/sediment or water according to OECD guideline 307, 308, or 309
1092 should be performed.

1093 When log Kow for the active substance is ≥ 3 , a bioconcentration factor (BCF) should be determined
1094 experimentally according to OECD 305 in order to evaluate the potential for secondary poisoning (see
1095 section 4.2.8). When this study results in a BCF-value > 2000, and the T-criterion according to **Table**
1096 **16** is fulfilled, a simulation degradation study should be performed in order to check whether the
1097 substance should be classified as PBT substance. In case of a BCF-value > 5000 a simulation
1098 degradation study should be performed and evaluated against the vPvB criteria.

1099 As for the risk assessment, the PBT assessment is performed for the environmentally relevant
1100 compound (e.g., in case of a pro-drug, the PBT assessment may be required for the active compound).

1101 **5.1. PBT Screening**

1102 A PBT screening should be performed for all active ingredients identified in the decision tree in section
1103 4.1 (**Figure 2**), regardless of whether or not the trigger for the Phase II risk assessment is met. A PBT
1104 assessment is not required for those compounds that do not require assessment according to Q1-Q3 of
1105 the Phase I decision tree (4.1).

1106 The PBT screening consists of the determination of an octanol/water partitioning coefficient (log Kow).
1107 In case of a dissociating compound, partitioning should be determined at three different pH values and
1108 the log D_{OW} for the neutral molecule should be determined (see section 4.2.1.1). When the trigger
1109 value of log Kow > 4.5 is met, a definitive PBT assessment should be performed.

1110 **5.2. Definitive PBT assessment**

1111 **5.2.1. PBT criteria**

1112 The criteria for the assessment of P, B and T properties (**Table 16**) are specified in REACH Annex XIII.

1113 **Table 16:** PBT and vPvB criteria (Annex XIII to the REACH Regulation taken from ECHA, Chapter R.11:
1114 PBT/vPvB assessment, Version 3.0 – June 2017)

Property	PBT criteria	vPvB criteria
Persistence	A substance fulfils the persistence criterion (P) in any of the following situations: (a) the degradation half-life in marine water is higher than 60 days; (b) the degradation half-life in fresh or estuarine water is higher than 40 days; (c) the degradation half-life in marine sediment is higher than 180 days; (d) the degradation half-life in fresh or estuarine water sediment is higher than 120 days; (e) the degradation half-life in soil is higher than 120 days.	A substance fulfils the “very persistent” criterion (vP) in any of the following situations: (a) the degradation half-life in marine, fresh or estuarine water is higher than 60 days; (b) the degradation half-life in marine, fresh or estuarine water sediment is higher than 180 days; (c) the degradation half in soil is higher than 180 days.
Bioaccumulation	A substance fulfils the bioaccumulation criterion (B) when the bioconcentration factor in aquatic species is higher than 2000.	A substance fulfils the “very bioaccumulative” criterion (vB) when the bioconcentration factor in aquatic species is higher than 5000.
Toxicity	A substance fulfils the toxicity criterion (T) in any of the following situations: (a) the long-term no-observed effect concentration (NOEC) or EC10 for marine or freshwater organisms is less than 0.01 mg/L; (b) substance meets the criteria for classification as carcinogenic (category 1A ² or 1B ³), germ cell mutagenic (category 1 or 1B), or toxic for reproduction (category 1A ⁴ , 1B ⁵ or 2 ⁶) according to Regulation EC No 1272/2008 ⁷ (c) 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.	

1115

1116 5.2.2. Performing the PBT assessment

1117 The REACH guidance on PBT assessment should be followed as much as possible, and deviations
1118 should be scientifically justified. It should be noted that for the REACH PBT assessment a tiered
1119 approach is followed, since REACH chemicals do not necessarily contain all required information in the

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

³ Substances presumed to have carcinogenic potential for humans (animal studies)

⁴ Known human reproductive toxicant (human evidence)

⁵ Presumed human reproductive toxicant (animal studies)

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

⁷ Regulation on classification, labelling and packaging (CLP-Regulation (EC) No 1272/2008)

1120 dossier. Note that the screening approaches used in REACH such as ecotoxicity QSARs are not
 1121 applicable to human pharmaceuticals because of the specific modes of action. In order to avoid
 1122 unnecessary animal testing, testing for the P, B and T criteria is conducted sequentially. For medicinal
 1123 products for which Phase II of the risk assessment is performed, most data are available (except for
 1124 persistence when soil assessment is not required) and a stepwise approach is not necessary.

1125 **5.2.2.1. Persistence**

1126 If the active substance is readily biodegradable (OECD301) and is not P then no further testing is
 1127 required. If this is not the case, an OECD 308 and/or OECD 307 or OECD 309 study should be
 1128 performed to evaluate the P criterion. If a Phase II risk assessment is not required, a surface water
 1129 simulation study (OECD 309) may be preferable. A soil simulation study (OECD 307) may be used for
 1130 PBT assessment, and is required if a terrestrial risk assessment is triggered.

1131 Persistence studies should reflect environmental temperatures in Europe and therefore preferably be
 1132 conducted at 12°C. According to the REACH PBT/vPvB assessment guideline (ECHA, 2017d) if studies
 1133 are conducted at different temperatures, degradation half-lives should be extrapolated to 12°C.

1134 The Arrhenius equation is used to extrapolate degradation half-life values from the experimental
 1135 temperature (e.g. 20°C) to 12°C:

1136

$$DT50_{T1} = DT50_{T2} \times e^{\left(\frac{E_A}{R} \times \left(\frac{1}{T_1} - \frac{1}{T_2}\right)\right)}$$

1137

1138 Parameters used in the Arrhenius equation

Parameter	Description	Unit	Default value
DT50 _{T1}	degradation half-life value at reference temperature	[d]	–
DT50 _{T2}	degradation half-life value at test temperature	[d]	–
E _A	activation energy for degradation	[J mol ⁻¹]	65,400
R	gas constant	[J mol ⁻¹ K ⁻¹]	8.314
T ₁	Reference temperature (12°C)	[K]	285
T ₂	Test temperature (e.g. 20°C)	[K]	–

1139

1140 If no experimentally determined value for E_A for degradation of the active compound is available, the
 1141 default value for E_A (activation energy) should be 65.4 kJ mol⁻¹⁸ corresponding to a Q₁₀ of 2.58, as
 1142 specified in the EFSA guidance for use in FOCUS (EFSA, 2007).

1143 For most persistent substances, removal from the aqueous phase is determined by dissipation due to
 1144 partitioning to sediment rather than by true degradation. For this reason, degradation half-life values
 1145 for the total system and sediment are considered most appropriate to describe the degradation half-life
 1146 of a substance in the aquatic environment. Thus, half-life values for the water phase, when
 1147 determined in water-sediment simulation studies, should only be used for the assessment of
 1148 persistence when justified.

⁸ 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 kJ mol⁻¹.

1149 To determine degradation rates (instead of dissipation rates) the formation of non-extractable residues
1150 should not be confused with degradation. Degradation studies should be preferably performed with
1151 radio labelled compounds and using the best possible extraction methods. Only in exceptional cases
1152 may acceptable degradation data be produced using an unlabelled test substance
1153 (EMA/CVMP/ERA/349254/2014; Reflection paper on poorly extractable and/or non-radiolabelled
1154 substances), since the mass balance requirement cannot be met.

1155 The highest sediment or total system degradation half-life value derived from the OECD 307 and/or
1156 308 and/or 309 tests should be used for the PBT assessment.

1157 **5.2.2.2. Bioaccumulation**

1158 The results of the OECD 305 (bioaccumulation in fish) study may be used for the assessment of
1159 bioaccumulation. This study is also required for risk assessment for secondary poisoning In Phase II
1160 (section 4.2.8). Since the B criterion is based on bioconcentration in aquatic species, the test species
1161 may also be other species than fish (e.g., mussels).

1162 It should be noted that a lack of accumulation in mammals does not automatically exclude a potential
1163 for accumulation in fish and other aquatic species. The reasons for this are decreased activity of
1164 enzymes involved in the transformation of xenobiotics in fish and/or lower trophic levels and other
1165 factors such as different exposure routes (e.g. via gills), differences in metabolism, different excretion
1166 routes, etc.

1167 For comparison with the B and vB criteria, the measured bioconcentration value(s) (BCF) should be
1168 normalised to 5% lipid content, including a correction for growth dilution as recommended by the
1169 OECD test guideline 305 and REACH guidance (ECHA, 2017d).

1170 Bioaccumulation studies should preferably be performed with radio labelled compounds and using the
1171 best possible extraction methods. Remaining residues in biota should be taken into account after the
1172 experimental depuration phase.

1173 **5.2.2.3. Toxicity**

1174 A substance fulfils the T criterion if it meets any of the toxicity criteria outlined in **Table 16**.
1175 Information on carcinogenicity, mutagenicity, reproductive and chronic toxicity for mammals should be
1176 available in other parts of the dossier and may also be obtained from the CLP inventory. This
1177 information should also be compared to the criteria in **Table 16**.

1178 When toxicity data as mentioned above do not show that the compound fulfils the T criteria, for
1179 welfare reasons normally the testing order based on chronic data is algae/cyanobacteria, then Daphnia
1180 and then fish. If the T-criterion is fulfilled (**Table 16**) by the chronic algae/cyanobacteria or Daphnia
1181 data, a chronic fish test is not necessary for the PBT assessment. If further aquatic toxicity studies
1182 other than the available studies are considered necessary to conclude on the T criteria, and if there are
1183 indications that representative species from one taxonomic group are more sensitive than species from
1184 other taxonomic groups, the most sensitive group should be chosen for chronic testing.

1185 For those substances where a Phase II assessment is triggered, sufficient toxicity studies are already
1186 available to verify whether the T criterion is met.

1187 **6. Search and evaluation of data**

1188 **6.1. Data Search**

1189 If of acceptable quality, data from published literature on the active substance may be employed in the
1190 ERA as

- 1191 • an alternative or supplement to the recommended standard experimental studies
- 1192 • a support for a proposed tailored approach
- 1193 • help with the interpretation of experimental data

1194 To be acceptable for use in risk and/or PBT assessment, literature studies should be of sufficient
1195 reliability and include a description of all relevant aspects of the study. Besides meeting reliability
1196 criteria (see section 6.2), literature studies used as alternatives to experimental studies should be
1197 comparable in design to the recommended study designs of the studies recommended in this guideline
1198 (e.g. OECD technical guideline study designs). GLP status is not an absolute requirement for studies in
1199 the published literature.

1200 Applicants may not refer to Public Assessment Reports (PARs or EPARs) reports or reviews or summary
1201 data from other regulatory frameworks without submitting a letter of access to the underlying studies.

1202 **6.2. Evaluation of studies**

1203 The approach used to assess the reliability and relevance of a study should be based on scientific
1204 argumentation and all studies, whatever their source, should be assessed in the same manner. A
1205 standardized assessment method designed for toxicological/ecotoxicological studies, such as the
1206 Klimisch (Klimisch et al, 1997) or CRED method (Moermond et al, 2016), is therefore recommended.
1207 All studies should be assigned a reliability category as according to the assessment method used
1208 (usually spanning 3 to 4 levels of reliability ranking), and be accompanied by a short study summary.

1209 **7. Labelling and risk mitigation**

1210 When the possibility of environmental risks cannot be excluded, specific arrangements to limit the
1211 environmental impact shall be made. The applicant should propose and to discuss a strategy for risk
1212 mitigation. Appropriate mitigation measures should generally aim at minimising the quantity
1213 discharged into the environment.

1214 Precautionary and safety measures may consist of:

- 1215 • An indication of potential risks presented by the medicinal product for the environment.
- 1216 • Appropriate product storage and disposal
- 1217 • Appropriate measures regarding the use of the medicinal product (e.g. to avoid the discharge of
1218 formulations such as patches and other devices into the sewage).

1219 Precautionary and safety measures should be practical and realistic given the anticipated use of the
1220 product.

1221 Appropriate disposal of unused pharmaceuticals, e.g. when shelf life has expired, is considered
1222 important to reduce the exposure of the environment. In order to enhance environmental protection, it
1223 is therefore recommended that – even medicinal products that do not require special disposal
1224 measures are appropriately labelled. See **Table 17**.

1225 Additional measures:

1226 The analytical verification of the active substance is part of the study description for the aquatic
 1227 toxicity studies and some fate studies. This information is essential for water managers, who wish to
 1228 monitor substances of concern. Thus, applicants are encouraged to share details on analytical
 1229 verification of their active substances in the form of a report on analytical verification on their websites
 1230 or in a general database, especially for those active substances with a risk to the environment. The
 1231 same applies for information on fate and ecotoxicological effects as well as for any other environmental
 1232 information on the active pharmaceutical substance resp. the medicinal product obtained at any time.

1233 **Table 17:** Proposed labelling aimed at minimising discharge of unused medicine into the environment

ERA category	SmPC 5.3	SmPC 6.6	Labelling (10)	PL (5)
<p>No significant risk to the environment</p> <p>or</p> <p>Current ERA data do not suggest a potential risk to the environment</p>	No statement	Any unused medicinal product or waste material should be disposed of in accordance with local requirements.	No statement	Do not throw away any medicines via wastewater <or household waste>. Ask your pharmacist how to throw away medicines you no longer use. These measures will help protect the environment.
<p>ERA has identified a potential risk to the environment.</p>	<p><i>Information to be driven by conclusion of the assessment e.g.:</i></p> <p><Environmental risk assessment studies have shown that <act.subst> has the potential to be persistent, bioaccumulative and toxic to the environment.></p> <p>or</p> <p><Environmental risk assessment studies have shown that <act.subst> may pose a risk for <environmental compartment(s)>.></p> <p>></p> <p>(See section 6.6)</p>	<p>This medicinal product may pose a risk to the environment. (See section 5.3)</p> <p>Any unused medicinal product or waste material should be disposed of in accordance with local requirements.</p>	No statement*	Do not throw away any medicines via wastewater <or household waste>. Ask your pharmacist how to throw away medicines you no longer use. These measures will help protect the environment.*

1234 * The actual information provided in the labelling and the PL should be considered on a case-by-case basis depending on the specific
1235 risk. In the package leaflet, this could lead to a specific advice regarding disposal. In the labelling, a relevant statement, if any,
1236 should be as short as possible, e.g. "Disposal: Read the package leaflet".

1237 **8. Scientific advice from the EMA or national competent** 1238 **authorities**

1239 The applicant may request scientific advice on issues related to environmental risk assessment and on
1240 possible precautionary and safety measures to be taken with respect to the use and disposal of a
1241 medicinal product.

1242 **9. Structure of the ERA report**

1243 The ERA report should be presented in Module 1.6 of the eCTD dossier. The full study reports and
1244 references should be provided in the annex of the ERA.

1245 The ERA report should start with a clear identification of the active ingredient, including company
1246 name/code, IUPAC name, CAS number, empirical formula, structural formula, SMILES code, and
1247 molecular weight.

1248 There may be cases in which the absence of environmental studies could be justified, as specified in
1249 section 4.1. In these cases, the expert should provide a rationale for the absence of studies in addition
1250 to the identification as mentioned above.

1251 The report should contain summaries of all studies used.

1252 A dated signature of the author, information on the author's educational, training and occupational
1253 experience, and a statement of the author's relationship with the applicant, shall be included.

1254 **10. References**

1255 EC (European Communities) (2011), Technical Guidance for Deriving Environmental Quality Standards.
1256 Common Implementation Strategy for the Water Framework Directive (2000/60/EC). Guidance
1257 Document No.27, Technical Report-2011–055.

1258 ECETOC, 2013. Understanding the relationship between extraction technique and bioavailability. 159
1259 Technical Report No. 117, Brussels, May 2013, ISSN-0773-8072-117.

1260 ECHA (2016), Guidance on Information Requirements and Chemical Safety Assessment: Chapter R.16:
1261 Environmental exposure assessment. Version 3.0, 2016

1262 ECHA (2017a), Guidance on Information Requirements and Chemical Safety Assessment: Chapter
1263 R.7a: Endpoint specific guidance. Version 4.0, 2017

1264 ECHA (2017b), Guidance on Information Requirements and Chemical Safety Assessment: Chapter
1265 R.7b: Endpoint specific guidance. Version 3.0, 2017

1266 ECHA (2017c), Guidance on Information Requirements and Chemical Safety Assessment: Chapter
1267 R.7c: Endpoint specific guidance. Version 3.0, 2017

1268 ECHA (2017d), Guidance on Information Requirements and Chemical Safety Assessment: Chapter
1269 R.11: PBT/vPvB assessment. Version 3.0, 2017

1270

1271 **Definitions**

1272	AF	Assessment factor
1273	BCF	Bioconcentration factor
1274	BMF	Biomagnification factor
1275	CHMP	Committee for Medicinal Products for Human Use
1276	CMR	Carcinogen, mutagen or reprotoxic (when chronic exposure) classification
1277	DT50	Degradation half-life of substance (in a given compartment)
1278	EAS	Endocrine active substance
1279	EC10	Effective concentration representing 10% of maximum effect
1280	EC50	Effective concentration representing 50% of maximum effect
1281	ECHA	European Chemicals Agency
1282	EPAR	European public assessment report
1283	ERA	Environmental risk assessment
1284	FELS	Fish early life stage (test)
1285	EQS-WFD	Environmental quality standard according to the Water framework directive
1286	FOCUS	FORum for the Co-ordination of pesticide fate models and their USE
1287	F _{PEN}	Market penetration factor
1288	GLP	Good Laboratory Practice
1289	HMP	Human medical product
1290	K _d	Adsorption distribution coefficient
1291	K _{oc}	Organic carbon normalized adsorption partition coefficient
1292	LOAEL	Lowest observed adverse effect level
1293	Log K _{ow}	Logarithm of octanol/water partitioning coefficient
1294	MoA	Mode of Action ((eco)toxicological)
1295	NOEC	No observed effect concentration
1296	OECD	Organization for Economic Co-operation and Development
1297	PAR	Public assessment report
1298	PEC	Predicted environmental concentration (in a given compartment)
1299	PNEC	Predicted no effect concentration (for a given species in a given compartment or
1300		organism)
1301	PBT	Persistent, Bioaccumulative and Toxic (substance classification)
1302	QSAR	Quantitative structure–activity relationship
1303	REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals

1304	RQ	Risk quotient (for a given compartment)
1305	SmPC	Summary of product characteristics
1306	STP	Sewage treatment plant
1307	vPvB	Very persistent and very bioaccumulative (substance classification)
1308		