IUCLID for microbial active substances





Microorganisms and IUCLID



IUCLID version 8.0

- > Validation rules for micro's
 - Not always appropriate IUCLID entrance checked
 - Business rules for less relevant input
 - E.g endpoint summary for study with only waivers
 - OHT's in IUCLID for non-obligatory DR for microbials

Microorganisms and IUCLID



	BR_PPP_ 016		Section 9. Fate and behaviour in the environment: At least one endpoint study summary must be provided for this section.
X	BR_PPP_ 016	10.2.4, Effects on aquatic macrophytes	Section 10.2.4 Effects on aquatic macrophytes: At least one endpoint study summary must be provided for this section.

From data requirements:

Relevant studies on pathogenic/infective effects on aquatic macrophytes shall be performed if the micro-organism is known to have an herbicidal mode of action, or to be closely related to a plant pathogen

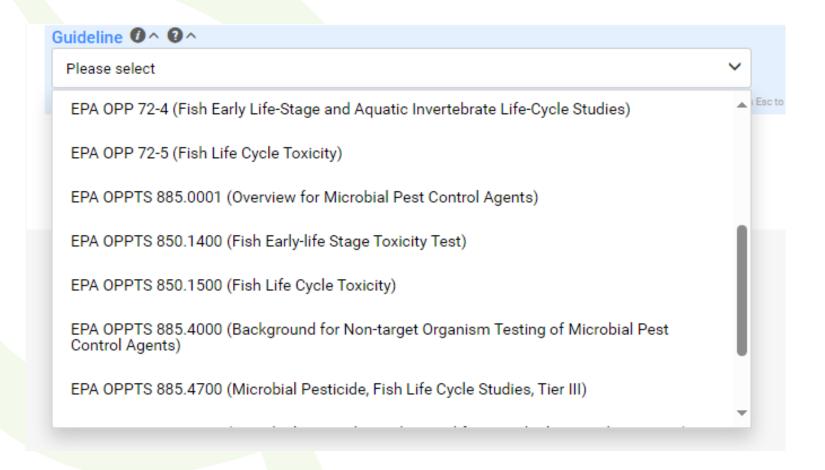


- Consequences of moving of the IUCLID requirements: guidelines not appropriate / up to date.
- Check units again. Some appropriate ones for m.o. missing (not only related to update)

Examples



Effects on aquatic organisms



Guidelines



Group C - Toxicology Test Guidelines

- 885.3000 Background--Mammalian Toxicity/Pathogenicity/Infectivity (February 1996)
- 885.3050 Acute Oral Toxicity/Pathogenicity (February 1996) [2]
- 885.3100 Acute Dermal Toxicity/Pathology (February 1996)
- 885.3150 Acute Pulmonary Toxicity/Pathogenicity (February 1996)
- 885.3200 Acute Injection Toxicity/Pathogenicity (February 1996)
- 885.3400 Hypersensitivity Incidents (February 1996) [2]
- 885.3500 Cell Culture (February 1996)
- 885.3550 Acute Toxicology, Tier II (February 1996)
- 885.3600 Subchronic Toxicity/Pathogenicity (February 1996) [2]
- 885.3650 Reproductive/Fertility Effects (February 1996) [2]

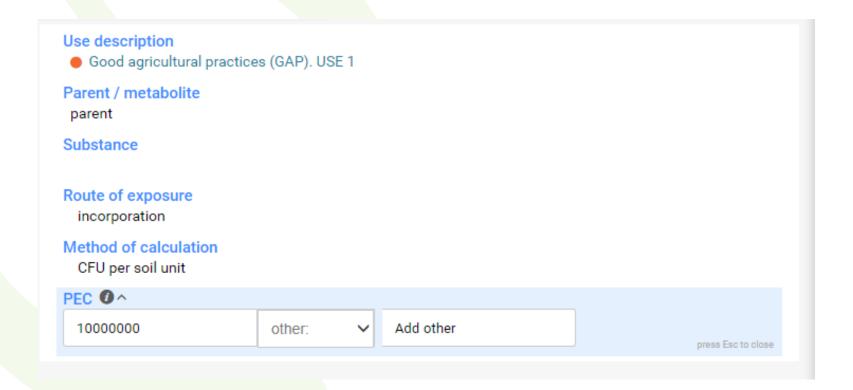
Group D - Nontarget Organism and Environmental Expression Test Guidelines

- 885.4000 Background for Nontarget Organism Testing of Microbial Pest Control Agents
- (February 1996) [2]
- 885.4050 Avian Oral, Tier I (February 1996)
- 885.4100 Avian Inhalation Test, Tier I (February 1996) [2]
- 885.4150 Wild Mammal Testing, Tier I (February 1996) [2]
- 885.4200 Freshwater Fish Testing, Tier I (February 1996)
- 885.4240 Freshwater Aquatic Invertebrate Testing, Tier I (February 1996)
- 885.4280 Estuarine and Marine Animal Testing, Tier I (February 1996) [7]
- 885.4300 Nontarget Plant Studies, Tier I (February 1996) [2]
- 885.4340 Nontarget Insect Testing, Tier I (February 1996)
- 885.4380 Honey Bee Testing, Tier I (February 1996) [Z]
- 885.4600 Avian Chronic Pathogenicity and Reproduction Test, Tier III (February 1996) [2]
- 885.4650 Aquatic Invertebrate Range Testing, Tier III (February 1996)
- 885.4700 Fish Life Cycle Studies, Tier III (February 1996)
- 885.4750 Aquatic Ecosystem Test (February 1996)



Appropriate Units

Environmental exposure





Appropriate Units Tox and ecotox

Nominal and measured concentrations

- Nominal test concentrations: 1 x 10⁴, 1 x 10⁵, 1 x 10⁶, 1 x 10⁶, 1 x 10⁷, and 1 x 10⁸ spores/g in diet. 1.1 x 10², 1.1 x 10³, 1.1 x 10⁴, 1.1 x 10⁵, and 1.1 x 10⁶ (Expected CFU in diet).

ect cor	ncentrations	+ New item	the Import file								
#	Key result	Duration	Dose descrip	Effect conc.	95% CI	Nominal / m	Conc. based	Life stage	Basis for eff	Remarks on	Actions
ij 1		10 d	NOEC	ca. 1000000000 other: spores/kg diet (migrated information)		nominal	act. ingr.		behaviour		
ij 2	<u> </u>	10 d	LC50	> 100000000000 other: spores/kg diet (migrated information)		nominal	act. ingr.		mortality		

Changes to IUCLID format



- Endpoint study summary template: information required for chemical safety assessment (header).
- ➤ a new box requiring data on studies. For most datapoints 3 requirements on short term, long term and higher tier studies. This is totally non-relevant for m.o.
- The dose descriptor is for lethal/toxic effects which is not appropriate for m.o. where infectivity/pathogenicity is the relevant endpoint. Entrance/units not appropriate.

The IUCLID set up as it was, was much more appropriate.

Changes to IUCLID format



Data descriptor

Key value for chemical safety assessment

Birds - short-term

Link to relevant study record(s)

Dose descriptor

Birds - long-term

Link to relevant study record(s)

Dose descriptor

Higher tier testing

Link to relevant study record(s)

Key information from higher tier testing

Effect concentration

Effect concentration

Changes to IUCLID format



Data descriptor

Key value for chemical safety assessment	Key v	alue fo	r chemical	safety	assessment
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Toxicity to bees - acute oral

Link to relevant study record(s)

Dose descriptor

Effect concentration

Toxicity to bees - acute contact

Link to relevant study record(s)

Dose descriptor

Effect concentration

Toxicity to bees - chronic

Link to relevant study record(s)

Dose descriptor

Effect concentration

Toxicity to bee larvae - chronic

Link to relevant study record(s)





- Submitting issues
 For applicants dependent on using the cloud
 - ✓ The IUCLID cloud is not updated to the latest version
 - ✓ Submission portal is the latest version
 - Not possible to submit dossier (version updated)
 - Business rules that need to be solved

IUCLID



Work around

- use the test portal
- see the BR and QLT
- go to the dataset and adapt
- generate dossier, create i6z file, upload in trial submission portal, submit again

This action cost like 20 minutes per cycle. As it appears hard to solve all issues at once (more colleagues on one dossier) it takes a lot of time

IUCLID



Message from ECHA:

Update of cloud version foreseen for the end of June only

Horror for dossiers ongoing with current short deadlines

Desktop version not solution with multiple experts





> Issues with existing dossiers after update

✓ The algorithm applied seems not appropriate.

Especially with the update to the new DR for m.o. in 2023

✓ Studies did not only end in obsolete but additionally in other sections. Some studies can be found multiple times at unlogic sections and headers.

Conclusion



- -For applicants each service update of IUCLID causes issues
 - the burden is hughe version control requirement stressed again
- -Turnaround time of dossiers must be shortened to avoid multiple updates
- -Changes to regulations should be better prepared before release





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