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Short Review

RIFM fragrance ingredient safety assessment, 2-ethyl-1,3,3-trimethyl-2--norbornanol, CAS Registry Number 18368-91-7

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Skin sensitization
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Local respiratory toxicity
Environmental safety

Version: 102820. This version replaces any previous versions.
Name: 2-Ethyl-1,3,3-trimethyl-2-norbornanol
CAS Registry Number: 18368-91-7
Additional CAS Numbers*:

(*continued on next column*)

(*continued*)

67952-68-5 Ethyl-1,3,3-trimethylbicyclo [2.2.1]heptan-2-ol
137255-07-3 Bicyclo[2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-*Included because the materials are isomers

(*continued on next page*)

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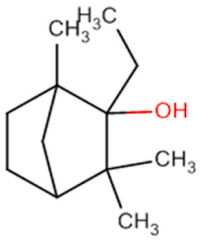

Abbreviation/Definition List:

2-Box Model - A RIFM, Inc. proprietary *in silico* tool used to calculate fragrance air exposure concentration
AF - Assessment Factor
BCF - Bioconcentration Factor
Creme RIFM Model - The Creme RIFM Model uses probabilistic (Monte Carlo) simulations to allow full distributions of data sets, providing a more realistic estimate of aggregate exposure to individuals across a population (Comiskey et al., 2015, 2017; Safford et al., 2015a, 2017) compared to a deterministic aggregate approach
DEREK - Derek Nexus is an *in silico* tool used to identify structural alerts
DRF - Dose Range Finding
DST - Dermal Sensitization Threshold
ECHA - European Chemicals Agency
ECOSAR - Ecological Structure-Activity Relationships Predictive Model
EU - Europe/European Union
GLP - Good Laboratory Practice
IFRA - The International Fragrance Association
LOEL - Lowest Observable Effect Level
MOE - Margin of Exposure
MPPD - Multiple-Path Particle Dosimetry. An *in silico* model for inhaled vapors used to simulate fragrance lung deposition
NA - North America
NESIL - No Expected Sensitization Induction Level
NOAEC - No Observed Adverse Effect Concentration
NOAEL - No Observed Adverse Effect Level
NOEC - No Observed Effect Concentration
NOEL - No Observed Effect Level
OECD - Organisation for Economic Co-operation and Development
OECD TG - Organisation for Economic Co-operation and Development Testing Guidelines
PBT - Persistent, Bioaccumulative, and Toxic
PEC/PNEC - Predicted Environmental Concentration/Predicted No Effect Concentration
Perfumery - In this safety assessment, perfumery refers to fragrances made by a perfumer used in consumer products only. The exposures reported in the safety assessment include consumer product use, but do not include occupational exposures.
QRA - Quantitative Risk Assessment
QSAR - Quantitative Structure-Activity Relationship
REACH - Registration, Evaluation, Authorisation, and Restriction of Chemicals
RfD - Reference Dose
RIFM - Research Institute for Fragrance Materials
RQ - Risk Quotient
Statistically Significant - Statistically significant difference in reported results as compared to controls with a $p < 0.05$ using appropriate statistical test
TTC - Threshold of Toxicological Concern
UV/Vis spectra - Ultraviolet/Visible spectra
VCF - Volatile Compounds in Food
VoU - Volume of Use
vPvB - (very) Persistent, (very) Bioaccumulative
WoE - Weight of Evidence

The Expert Panel for Fragrance Safety* concludes that this material is safe as described in this safety assessment.

This safety assessment is based on the RIFM Criteria Document (Api, 2015), which should be referred to for clarifications.

Each endpoint discussed in this safety assessment includes the relevant data that were available at the time of writing (version number in the top box is indicative of the date of approval based on a 2-digit month/day/year), both in the RIFM Database (consisting of publicly available and proprietary data) and through publicly available information sources (e.g., SciFinder and PubMed). Studies selected for this safety assessment were based on appropriate test criteria, such as acceptable guidelines, sample size, study duration, route of exposure, relevant animal species, most relevant testing endpoints, etc. A key study for each endpoint was selected based on the most conservative endpoint value (e.g., PNEC, NOAEL, LOEL, and NESIL).

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*The Expert Panel for Fragrance Safety is an independent body that selects its own members and establishes its own operating procedures. The Expert Panel is comprised of internationally known scientists that provide RIFM with guidance relevant to human health and environmental protection.

Summary: The existing information supports the use of this material as described in this safety assessment.

2-Ethyl-1,3,3-trimethyl-2-norbornanol was evaluated for genotoxicity, repeated dose toxicity, reproductive toxicity, local respiratory toxicity, phototoxicity/photoallergenicity, skin sensitization, and environmental safety. Data show that 2-ethyl-1,3,3-trimethyl-2-norbornanol is not genotoxic. The repeated dose, reproductive, and local respiratory toxicity endpoints were evaluated using the Threshold of Toxicological Concern (TTC) for a Cramer Class II material, and the exposure to 2-ethyl-1,3,3-trimethyl-2-norbornanol is below the TTC (0.009 mg/kg/day, 0.009 mg/kg/day, and 0.47 mg/day, respectively). The skin sensitization endpoint was completed using the Dermal Sensitization Threshold (DST) for non-reactive materials (900 μg/cm^2); exposure is below the DST. The phototoxicity/photoallergenicity endpoints were evaluated based on ultraviolet (UV) spectra; 2-ethyl-1,3,3-trimethyl-2-norbornanol is not expected to be phototoxic/photoallergenic. The environmental endpoints were evaluated; 2-ethyl-1,3,3-trimethyl-2-norbornanol was found not to be Persistent, Bioaccumulative, and Toxic (PBT) as per the International Fragrance Association (IFRA) Environmental Standards, and its risk quotients, based on its current volume of use in Europe and North America (i.e., Predicted Environmental Concentration/Predicted No Effect Concentration [PEC/PNEC]), are <1.

Human Health Safety Assessment

Genotoxicity: Not genotoxic. (RIFM, 2017b; RIFM, 2017a; RIFM, 2017c)

Repeated Dose Toxicity: No NOAEL available. Exposure is below TTC.

Reproductive Toxicity: No NOAEL available. Exposure is below TTC.

Skin Sensitization: No safety concerns at current, declared use levels; the exposure is below the DST.

Phototoxicity/Photoallergenicity: Not expected to be phototoxic/photoallergenic. (UV Spectra; RIFM Database)

Local Respiratory Toxicity: No NOAEC available. Exposure is below the TTC.

Environmental Safety Assessment

Hazard Assessment:

Persistence:
Screening-level: 2.16 (BIOWIN 3) (EPI Suite v4.11; US EPA, 2012a)

Bioaccumulation:
Screening-level: 148.5 L/kg (EPI Suite v4.11; US EPA, 2012a)

Ecotoxicity:
Screening-level: Fish LC50: 6.68 mg/L (RIFM Framework; Salvito, 2002)

Conclusion: Not PBT or vPvB as per IFRA Environmental Standards

Risk Assessment:

Screening-level: PEC/PNEC (North America and Europe) < 1 (RIFM Framework; Salvito, 2002)

Critical Ecotoxicity Endpoint: Fish LC50: 6.68 mg/L (RIFM Framework; Salvito, 2002)

RIFM PNEC is: 0.00668 μg/L

- **Revised PEC/PNECs (2015 IFRA VoU):** North America and Europe: Not applicable: Cleared at screening-level

1. Identification

Chemical Name: 2-Ethyl-1,3,3-trimethyl-2-norbornanol	Chemical Name: Ethyl-1,3,3-trimethylbicyclo [2.2.1]heptan-2-ol	Chemical Name: Bicyclo [2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-
CAS Registry Number: 18368-91-7	**CAS Registry Number:** 67952-68-5	**CAS Registry Number:** 137255-07-3
Synonyms: 2-Ethylfenchol; 2-Ethyl-1,3,3-trimethylbicyclo(2.2.1) heptan-2-ol; 2-Norbornanol, 2-ethyl-1,3,3-trimethyl-; 2-Ethyl-	**Synonyms:** Bicyclo [2.2.1]heptan-2-ol, ethyl-1,3,3-trimethyl-; Ethyl-1,3,3-trimethylbicyclo[2.2.1] heptan-2-ol	**Synonyms:** Bicyclo [2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-

(*continued on next page*)

(*continued*)

Chemical Name: 2-Ethyl-1,3,3-trimethyl-2-norbornanol	Chemical Name: Ethyl-1,3,3-trimethylbicyclo [2.2.1]heptan-2-ol	Chemical Name: Bicyclo [2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-
1,3,3-trimethyl-2-norbornanol		
Molecular Formula: $C_{12}H_{22}O$	**Molecular Formula:** $C_{12}H_{22}O$	**Molecular Formula:** $C_{12}H_{22}O$
Molecular Weight: 182.3	**Molecular Weight:** 182.3	**Molecular Weight:** 182.3
RIFM Number: 5101	**RIFM Number:** 5870	**RIFM Number:** 6931
Stereochemistry: Three chiral centers and 8 stereoisomers	**Stereochemistry:** Three chiral centers and 8 stereoisomers	**Stereochemistry:** Three chiral centers and 8 stereoisomers

2. Physical data

CAS # 18368-91-7	CAS # 67952-68-5	CAS # 137255-07-3
Boiling Point: 229.08 °C (EPI Suite)	**Boiling Point:** 229.08 °C (EPI Suite)	**Boiling Point:** Not Available
Flash Point: Not Available	**Flash Point:** Not Available	**Flash Point:** Not Available
Log K_{OW}: 3.8 (EPI Suite)	**Log K_{OW}:** 3.8 (EPI Suite)	**Log K_{OW}:** Not Available
Melting Point: 42.13 °C (EPI Suite)	**Melting Point:** 42.13 °C (EPI Suite)	**Melting Point:** Not Available
Water Solubility: 99.48 mg/L (EPI Suite)	**Water Solubility:** 99.48 mg/L (EPI Suite)	**Water Solubility:** Not Available
Specific Gravity: Not Available	**Specific Gravity:** Not available	**Specific Gravity:** Not Available
Vapor Pressure: 0.0043 mm Hg at 20 °C (EPI Suite v4.0), 0.00801 mm Hg at 25 °C (EPI Suite)	**Vapor Pressure:** 0.0043 mm Hg at 20 °C (EPI Suite v4.0), 0.00801 mm Hg at 25 °C (EPI Suite)	**Vapor Pressure:** 0.0043 mm Hg at 20 °C (EPI Suite v4.0)
UV Spectra: No significant absorbance between 290 and 700 nm; molar absorption coefficient is below the benchmark (1000 L mol^{-1} · cm^{-1})	**UV Spectra:** No significant absorbance between 290 and 700 nm; molar absorption coefficient is below the benchmark (1000 L mol^{-1} · cm^{-1})	**UV Spectra:** No significant absorbance between 290 and 700 nm; molar absorption coefficient is below the benchmark (1000 L mol^{-1} · cm^{-1})
Appearance/ Organoleptic: Not available	**Appearance/ Organoleptic:** Not available	**Appearance/ Organoleptic:** Not available

3. Volume of use (worldwide band)

1 .0.1–1 metric ton per year (IFRA, 2015)

4. Exposure to fragrance ingredient (Creme RIFM Aggregate Exposure Model v1.0)***

1. 95th Percentile Concentration in Hydroalcoholics: 0.020%	RIFM (2016)
2. Inhalation Exposure*: 0.00027 mg/kg/day or 0.019 mg/day	RIFM (2016)
3. Total Systemic Exposure**: 0.00051 mg/kg/day	RIFM (2016)

*95th percentile calculated exposure derived from concentration survey data in the Creme RIFM Aggregate Exposure Model (Comiskey, 2015, 2017; Safford, 2015a, 2017).

**95th percentile calculated exposure; assumes 100% absorption unless modified by dermal absorption data as reported in Section V. It is derived from concentration survey data in the Creme RIFM Aggregate Exposure Model and includes exposure via dermal, oral, and inhalation routes whenever the fragrance ingredient is used in products that include these routes of exposure (Comiskey, 2015, 2017; Safford, 2015a, 2017).

***When a safety assessment includes multiple materials, the highest exposure out of all included materials will be recorded here for the 95th Percentile Concentration in hydroalcoholics, inhalation exposure, and total exposure.

5. Derivation of systemic absorption

1. **Dermal:** Assumed 100%
2. **Oral:** Assumed 100%
3. **Inhalation:** Assumed 100%

6. Computational toxicology evaluation

1. **Cramer Classification:** Class II*, Intermediate (Expert Judgment)

Expert Judgment	Toxtree v3.1	OECD QSAR Toolbox v3.2
II	III	I

*Due to potential discrepancies with the current *in silico* tools (Bhatia et al., 2015), the Cramer class of the target material was determined using expert judgment based on the Cramer decision tree (Cramer et al., 1978). See the Appendix below for further details.

2. **Analogs Selected**:
   a. **Genotoxicity**: None
   b. **Repeated Dose Toxicity**: None
   c. **Reproductive Toxicity:** None
   d. **Skin Sensitization**: None
   e. **Phototoxicity/Photoallergenicity**: None
   f. **Local Respiratory Toxicity**: None
   g. **Environmental Toxicity**: None
3. **Read-across Justification**: None

7. Metabolism

No relevant data available for inclusion in this safety assessment.
Additional References: None.

8. Natural occurrence (discrete chemical) or composition (NCS)

2-Ethyl-1,3,3-trimethyl-2-norbornanol and additional materials ethyl-1,3,3-trimethylbicyclo[2.2.1]heptan-2-ol and bicyclo[2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)- are not reported to occur in foods by the VCF*.

*VCF (Volatile Compounds in Food): Database/Nijssen, L.M.; Ingen-Visscher, C.A. van; Donders, J.J.H. (eds). – Version 15.1 – Zeist (The Netherlands): TNO Triskelion, 1963–2014. A continually updated database containing information on published volatile compounds that have been found in natural (processed) food products. Includes FEMA GRAS and EU-Flavis data.

9. REACH dossier

No dossiers available as of 10/28/20.

10. Conclusion

The existing information supports the use of this material as described in this safety assessment.

11. Summary

11.1. Human health endpoint summaries

11.1.1. Genotoxicity

Based on the current existing data, 2-ethyl-1,3,3-trimethyl-2-norbornanol does not present a concern for genotoxicity.

11.1.1.1. Risk assessment. 2-Ethyl-1,3,3-trimethyl-2-norbornanol was assessed in the BlueScreen assay and found negative for both cytotoxicity (positive: <80% relative cell density) and genotoxicity, with and without metabolic activation (RIFM, 2013).

The mutagenic activity of 2-ethyl-1,3,3-trimethyl-2-norbornanol has been evaluated in a bacterial reverse mutation assay conducted in compliance with GLP regulations and in accordance with OECD TG 471 using the standard plate incorporation method (RIFM, 2017b). *Salmonella typhimurium* strains TA98, TA100, TA1535, TA1537, and *Escherichia coli* strain WP2uvrA were treated with 2-ethyl-1,3,3-trimethyl-2-norbornanol in dimethyl sulfoxide (DMSO) at concentrations up to 5000 μg/plate. A >3 fold increase in the mean number of revertant colonies was observed at concentrations ≥1600 μg/plate in TA1535 in the presence of S9 in the initial and confirmatory assays. A >3-fold increase was also observed at 1600 μg/plate in TA1535 in the absence of S9 only in the initial assay. No increases in the mean number of revertant colonies were observed at any tested concentration in the presence or absence of S9 in any other tester strain (RIFM, 2017b). Under the conditions of the study, 2-ethyl-1,3,3-trimethyl-2-norbornanol was considered to be mutagenic in the Ames test. In order to verify the biological relevance of the results in the *in vitro* Ames study, the genotoxic activity of 2-ethyl-1,3,3-trimethyl-2-norbornanol was evaluated in a combined *in vivo* COMET/micronucleus test conducted in compliance with GLP regulations. The test material was administered in corn oil via oral gavage to groups of male and female CD-1 mice. Doses of 125, 250, or 500 mg/kg were administered for 4 consecutive days. Mice from each dose level were euthanized at 3–4 h post last dose and blood was collected and examined for micronuclei evaluation; the liver was used for the COMET assay analysis. The test material did not induce a statistically significant increase in the incidence of micronucleated polychromatic erythrocytes in blood or induced a significant increase in DNA damage in the liver (RIFM, 2017c). Under the conditions of the study, 2-ethyl-1,3,3-trimethyl-2-norbornanol was considered to be non-genotoxic in the combined *in vivo* COMET/micronucleus test.

The clastogenic activity of 2-ethyl-1,3,3-trimethyl-2-norbornanol was evaluated in an *in vitro* micronucleus test conducted in compliance with GLP regulations and in accordance with OECD TG 487. Human peripheral blood lymphocytes were treated with 2-ethyl-1,3,3-trimethyl-2-norbornanol in DMSO at concentrations up to 1823 μg/mL in a dose range finding (DRF) study; micronuclei analysis was conducted at concentrations up to 162 μg/mL in the presence and absence of metabolic activation. 2-Ethyl-1,3,3-trimethyl-2-norbornanol did not induce binucleated cells with micronuclei when tested up to cytotoxic levels concentration in either the presence or absence of an S9 activation system (RIFM, 2017a). Under the conditions of the study, 2-ethyl-1,3,3-trimethyl-2-norbornanol was considered to be non-clastogenic in the *in vitro* micronucleus test.

Based on the data available, 2-ethyl-1,3,3-trimethyl-2-norbornanol does not present a concern for genotoxic potential.

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/26/20.

11.1.2. Repeated dose toxicity

There are insufficient repeated dose toxicity data on 2-ethyl-1,3,3-trimethyl-2-norbornanol or any read-across materials. The total systemic exposure to 2-ethyl-1,3,3-trimethyl-2-norbornanol is below the TTC for the repeated dose toxicity endpoint of a Cramer Class II material at the current level of use.

11.1.2.1. Risk assessment. There are no repeated dose toxicity data on 2-ethyl-1,3,3-trimethyl-2-norbornanol or any read-across materials that can be used to support the repeated dose toxicity endpoint. The total systemic exposure (0.51 μg/kg/day) is below the TTC for the repeated dose toxicity endpoint (9 μg/kg/day; Kroes, 2007).

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/12/20.

11.1.3. Reproductive toxicity

There are insufficient reproductive toxicity data on 2-ethyl-1,3,3-trimethyl-2-norbornanol or any read-across materials. The total systemic exposure to 2-ethyl-1,3,3-trimethyl-2-norbornanol is below the TTC for the reproductive toxicity endpoint of a Cramer Class II material at the current level of use.

11.1.3.1. Risk assessment. There are no reproductive toxicity data on 2-ethyl-1,3,3-trimethyl-2-norbornanol or any read-across materials that can be used to support the reproductive toxicity endpoint. The total systemic exposure (0.51 μg/kg/day) is below the TTC for the reproductive toxicity endpoint (9 μg/kg/day; Kroes, 2007; Laufersweiler, 2012).

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/21/20.

11.1.4. Skin sensitization

Based on the application of DST, 2-ethyl-1,3,3-trimethyl-2-norbornanol and its isomers, ethyl-1,3,3-trimethylbicyclo[2.2.1]heptan-2-ol and bicyclo[2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-, do not present a concern for skin sensitization under the current, declared levels of use.

11.1.4.1. Risk assessment. The chemical structures of 2-ethyl-1,3,3-trimethyl-2-norbornanol and its isomers, ethyl-1,3,3-trimethylbicyclo[2.2.1]heptan-2-ol and bicyclo[2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)-, indicate that they would not be expected to react with skin proteins directly (Roberts, 2007; Toxtree v3.1.0; OECD Toolbox v4.2). No predictive skin sensitization studies are available for these materials. Due to the absence of data, the reported exposure was benchmarked utilizing the non-reactive DST of 900 μg/cm^2 (Safford, 2008, 2011, 2015b; Roberts, 2015). The current exposure from the 95th percentile concentration is below the DST for non-reactive materials when evaluated in all QRA categories. Table 1 provides the maximum acceptable concentrations for 2-ethyl-1,3,3-trimethyl-2-norbornanol and its isomer that present no appreciable risk for skin sensitization based on the non-reactive DST. These levels represent maximum acceptable concentrations based on the DST approach. However, additional studies may show it could be used at higher levels.

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/03/20.

11.1.5. Phototoxicity/photoallergenicity

Based on the available UV/Vis spectra, 2-ethyl-1,3,3-trimethyl-2-norbornanol would not be expected to present a concern for phototoxicity or photoallergenicity.

11.1.5.1. Risk assessment. There are no phototoxicity studies available for 2-ethyl-1,3,3-trimethyl-2-norbornanol in experimental models. UV/Vis absorption spectra indicate no significant absorption between 290 and 700 nm. The corresponding molar absorption coefficient is well below the benchmark of concern for phototoxicity and photoallergenicity (Henry, 2009). Based on the lack of absorbance, 2-ethyl-1,3,3-trimethyl-2-norbornanol does not present a concern for phototoxicity or photoallergenicity.

11.1.5.2. UV spectra analysis. UV/Vis absorption spectra (OECD TG 101) were obtained. The spectra indicate no significant absorbance in the range of 290–700 nm. The molar absorption coefficient is below the benchmark of concern for phototoxic effects, 1000 L mol^{-1} · cm^{-1} (Henry, 2009).

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/18/20.

Table 1
Maximum acceptable concentrations for 2-ethyl-1,3,3-trimethyl-2-norbornanol, ethyl-1,3,3-trimethylbicyclo[2.2.1]heptan-2-, and bicyclo[2.2.1]heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)- that present no appreciable risk for skin sensitization based on non-reactive DST.

IFRA Category[a]	Description of Product Type	Maximum Acceptable Concentrations in Finished Products Based on Non-reactive DST	Reported 95th Percentile Use Concentrations of 2-ethyl-1,3,3-trimethyl-2-norbornanol in Finished Products	Reported 95th Percentile Use Concentrations of ethyl-1,3,3-trimethylbicyclo [2.2.1]heptan-2- in Finished Products	Reported 95th Percentile Use Concentrations of bicyclo[2.2.1] heptan-2-ol, 2-ethyl-1,3,3-trimethyl-, (1R,2R,4S)- in Finished Products
1	Products applied to the lips	0.069%	NRU[b]	NRU[b]	NRU[b]
2	Products applied to the axillae	0.021%	2.3×10^{-5}%	NRU[b]	NRU[b]
3	Products applied to the face using fingertips	0.41%	NRU[b]	NRU[b]	NRU[b]
4	Fine fragrance products	0.39%	2.4×10^{-4}%	0.020%	2.4×10^{-4}%
5	Products applied to the face and body using the hands (palms), primarily leave-on	0.10%	3.0×10^{-5}%	NRU[b]	3.0×10^{-5}%
6	Products with oral and lip exposure	0.23%	NRU[b]	NRU[b]	NRU[b]
7	Products applied to the hair with some hand contact	0.79%	NRU[b]	NRU[b]	NRU[b]
8	Products with significant ano-genital exposure	0.041%	No Data[c]	NRU[b]	No Data[c]
9	Products with body and hand exposure, primarily rinse-off	0.75%	4.4×10^{-4}%	0.0040%	6.5×10^{-4}%
10	Household care products with mostly hand contact	2.7%	NRU[b]	0.032%	NRU[b]
11	Products with intended skin contact but minimal transfer of fragrance to skin from inert substrate	1.5%	No Data[c]	No Data[c]	No Data[c]
12	Products not intended for direct skin contact, minimal or insignificant transfer to skin	No Restriction	0.05	1	0.0111

Note: [a]For a description of the categories, refer to the IFRA/RIFM Information Booklet.
[b] No reported use.
[c] Fragrance exposure from these products is very low. These products are not currently in the Creme RIFM Aggregate Exposure Model.

11.1.6. Local respiratory toxicity

The margin of exposure could not be calculated due to a lack of appropriate data. The exposure level for 2-ethyl-1,3,3-trimethyl-2-norbornanol is below the Cramer Class III TTC value for inhalation exposure local effects.

11.1.6.1. Risk assessment. There are no inhalation data available on 2-ethyl-1,3,3-trimethyl-2-norbornanol. Based on the Creme RIFM Model, the inhalation exposure is 0.019 mg/day. This exposure is 24.7 times lower than the Cramer Class III TTC value of 0.47 mg/day (based on human lung weight of 650 g; Carthew, 2009); therefore, the exposure at the current level of use is deemed safe.

*As per Carthew et al. (2009), Cramer Class II materials default to Cramer Class III for the local respiratory toxicity endpoint.

Additional References: None.

Literature Search and Risk Assessment Completed On: 02/26/20.

12. Environmental endpoint summary

12.1. Screening-level assessment

A screening-level risk assessment of 2-ethyl-1,3,3-trimethyl-2-norbornanol was performed following the RIFM Environmental Framework (Salvito, 2002), which provides 3 tiered levels of screening for aquatic risk. In Tier 1, only the material's regional VoU, its log K_{OW}, and its molecular weight are needed to estimate a conservative risk quotient (RQ), expressed as the ratio Predicted Environmental Concentration/Predicted No Effect Concentration (PEC/PNEC). A general QSAR with a high uncertainty factor applied is used to predict fish toxicity, as discussed in Salvito et al. (2002). In Tier 2, the RQ is refined by applying a lower uncertainty factor to the PNEC using the ECOSAR model (US EPA, 2012b), which provides chemical class-specific ecotoxicity estimates. Finally, if necessary, Tier 3 is conducted using measured biodegradation and ecotoxicity data to refine the RQ, thus allowing for lower PNEC uncertainty factors. The data for calculating the PEC and PNEC for this safety assessment are provided in the table below. For the PEC, the range from the most recent IFRA Volume of Use Survey is reviewed. The PEC is then calculated using the actual regional tonnage, not the extremes of the range. Following the RIFM Environmental Framework, 2-ethyl-1,3,3-trimethyl-2-norbornanol was identified as a fragrance material with no potential to present a possible risk to the aquatic environment (i.e., its screening-level PEC/PNEC <1).

A screening-level hazard assessment using EPI Suite v4.11 (US EPA, 2012a) identified 2-ethyl-1,3,3-trimethyl-2-norbornanol as possibly persistent but not bioaccumulative based on its structure and physical–chemical properties. This screening-level hazard assessment considers the potential for a material to be persistent *and* bioaccumulative *and* toxic, or very persistent *and* very bioaccumulative as defined in the Criteria Document (Api, 2015). As noted in the Criteria Document, the screening criteria applied are the same as those used in the EU for REACH (ECHA, 2012). For persistence, if the EPI Suite model BIOWIN 3 predicts a value $<$ 2.2 and either BIOWIN 2 or BIOWIN 6 predicts a value $<$ 0.5, then the material is considered potentially persistent. A material would be considered potentially bioaccumulative if the EPI Suite model BCFBAF predicts a fish BCF $\geq$2000 L/kg. Ecotoxicity is determined in the above screening-level risk assessment. If, based on

these model outputs (Step 1), additional assessment is required, a WoE-based review is then performed (Step 2). This review considers available data on the material's physical–chemical properties, environmental fate (e.g., OECD Guideline biodegradation studies or die-away studies), fish bioaccumulation, and higher-tier model outputs (e.g., US EPA's BIOWIN and BCFBAF found in EPI Suite v4.11).

12.1.1. Risk assessment

Based on the current Volume of Use (2015), 2-ethyl-1,3,3-trimethyl-2-norbornanol presents no risk to the aquatic compartment in the screening-level assessment.

12.1.2. Key studies

12.1.2.1. Biodegradation. No data available.

12.1.2.2. Ecotoxicity. No data available.

12.1.3. Other available data

2-Ethyl-1,3,3-trimethyl-2-norbornanol has been pre-registered for REACH with no additional information available at this time.

12.1.3.1. Risk assessment refinement. Ecotoxicological data and PNEC derivation (all endpoints reported in mg/L; PNECs in μg/L)

Endpoints used to calculate PNEC are underlined.

Exposure information and PEC calculation (following RIFM Environmental Framework: Salvito, 2002)

Exposure	Europe (EU)	North America (NA)
Log K_{OW} Used	3.8	3.8
Biodegradation Factor Used	0	0
Dilution Factor	3	3
Regional Volume of Use Tonnage Band*	<1	<1
Risk Characterization: PEC/PNEC	**<1**	**<1**

*Combined Regional Volume of Use for all CAS #s.

Based on available data, the RQ for this material is < 1. No further assessment is necessary.

The RIFM PNEC is 0.00668 μg/L. The revised PEC/PNECs for EU and NA are not applicable. The material was cleared at the screening-level; therefore, it does not present a risk to the aquatic environment at the current reported volumes of use.

Literature Search and Risk Assessment Completed On: 02/24/20.

13. Literature Search*

- **RIFM Database:** Target, Fragrance Structure-Activity Group materials, other references, JECFA, CIR, SIDS
- **ECHA:** https://echa.europa.eu/
- **NTP:** https://ntp.niehs.nih.gov/
- **OECD Toolbox:** https://www.oecd.org/chemicalsafety/risk-assessment/oecd-qsar-toolbox.htm
- **SciFinder:** https://scifinder.cas.org/scifinder/view/scifinder/scifinderExplore.jsf
- **PubMed:** https://www.ncbi.nlm.nih.gov/pubmed
- **National Library of Medicine's Toxicology Information Services:** https://toxnet.nlm.nih.gov/
- **IARC:** https://monographs.iarc.fr
- **OECD SIDS:** https://hpvchemicals.oecd.org/ui/Default.aspx
- **EPA ACToR:** https://actor.epa.gov/actor/home.xhtml
- **US EPA HPVIS:** https://ofmpub.epa.gov/oppthpv/public_search.publicdetails?submission_id=24959241&ShowComments=Yes&sqlstr=null&recordcount=0&User_title=DetailQuery%20Results&EndPointRpt=Y#submission
- **Japanese NITE:** https://www.nite.go.jp/en/chem/chrip/chrip_search/systemTop
- **Japan Existing Chemical Data Base (JECDB):** http://dra4.nihs.go.jp/mhlw_data/jsp/SearchPageENG.jsp
- **Google:** https://www.google.com
- **ChemIDplus:** https://chem.nlm.nih.gov/chemidplus/

Search keywords: CAS number and/or material names.

*Information sources outside of RIFM's database are noted as appropriate in the safety assessment. This is not an exhaustive list. The links listed above were active as of 05/31/20.

Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper. We wish to confirm that there are no known conflicts of interest associated with this publication and there has been no significant financial support for this work that could have influenced its outcome. RIFM staff are employees of the Research Institute for Fragrance Materials, Inc. (RIFM). The Expert Panel receives a small honorarium for time spent reviewing the subject work.

Appendix

Explanation of Cramer Classification

Due to potential discrepancies between the current *in silico* tools (Bhatia et al., 2015), the Cramer Class of the target material was determined using expert judgment, based on the Cramer decision tree.

Q1. Normal constituent of the body? No
Q2. Contains functional groups associated with enhanced toxicity? No
Q3. Contains elements other than C, H, O, N, and divalent S? No
Q5. Simply branched aliphatic hydrocarbon or a common carbohydrate? No
Q6. Benzene derivative with certain substituents? No
Q7. Heterocyclic? No
Q16. Common terpene? (see Cramer et al., 1978 for detailed explanation)? No
Q17. Readily hydrolyzed to a common terpene? No
Q19. Open chain? No

	(mg/L)	(*Daphnia*) (mg/L)	(Algae) (mg/L)			
RIFM Framework Screening-level **(Tier 1)**	6.68			1000000	0.00668	

Q23. Aromatic? No
Q24. Monocarbocyclic with simple substituents? No
Q25. Cyclopropane? No
Q26. Monocycloalkanone or a bicyclocompound? Yes, Class Intermediate (Class II)

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