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Proceedings of the Concawe Workshop for an Analytical Technology Exchange to meet Health & Environmental Regulatory Challenges for UVCBs





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ABSTRACT

These proceedings are a record of the Concawe workshop held in Helsinki, Finland at the European Chemicals Agency (ECHA) on the 8th November 2023.

The workshop aimed to increase the understanding of regulators, industry scientists, and academic scientists about the challenges in analysis of petroleum UVCB substance composition to support EU REACH human health & environment hazard assessments, particularly with regard to high boiling point and high-complexity petroleum substances. Posters from ten academic and independent testing laboratories were presented to demonstrate the current analytical capabilities with these substances.

The 130 attendees from ECHA, Member State competent authorities, the oil and chemical industries and analytical laboratories discussed both the chemical analysis requirements of the REACH regulations with presentations from ECHA and Concawe and the potential to provide information to meet these requirements with the current and evolving analytical technologies.

Discussions at the workshop highlighted the need for further work to clarify the analytical data required to comply with regulations. A number of limitations in the currently available analytical technologies are to be addressed including the extension of comprehensive and quantitative analysis of constituent groups with carbon numbers above C30 and the development of mass spectrometric output and data interpretation to allow both quantitative and structural information to be determined.



KEYWORDS

Workshop, UVCB, petroleum substance, chemical analysis, REACH, constituent, structural similarity, read across

INTERNET

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SUMMARY

These proceedings are a non-verbatim record of the Concawe workshop held in Helsinki, Finland at the European Chemicals Agency (ECHA) on the 8th November 2023.

The workshop aimed to increase the understanding of regulators, industry and academia about the challenges in analysis of petroleum UVCB substance composition to support EU REACH human health and environmental hazard assessment, particularly with regard to higher boiling point and more complex substances.

Participants included 130 attendees from ECHA, Member State competent authorities, the oil and chemical industries and analytical laboratories.

The meeting opened with presentations from ECHA and Concawe summarizing the chemical analysis requirements of the REACH regulations. A poster session followed with presentations from ten academic and independent analytical testing laboratories to demonstrate the current capabilities in petroleum substance characterisation across a range of technologies.

Breakout groups were formed to discuss the challenges laid out in the ECHA and Concawe presentations and the output of these discussions was summarised. A Concawe project (termed the "All-Constituent Challenge" (ACC)) was launched in a session for analytical laboratories immediately following the workshop. The ACC project aims to allow analytical laboratories to demonstrate their capabilities in providing as much compositional information as possible for a set of heavy (>C30) petroleum substances.

Discussions at the workshop highlighted the need to for further work to clarify the analytical data required to comply with EU REACH regulations. A number of limitations in the currently available analytical technologies are to be addressed including the extension of comprehensive and quantitative analysis of constituent groups above C30 and the development of mass spectrometric output and data interpretation to allow both quantitative and structural information to be determined in the absence of analytical standard reference compounds for most constituents.



1. INTRODUCTION

Concawe manages the EU REACH registration dossiers of over 140 registered petroleum UVCB (2) substances grouped into 20 categories ranging from light (*e.g.*, naphtha) to heavy (*e.g.* bitumen) substances. The EU REACH Regulation (1) requires registrants of UVCB substances to provide detailed and comprehensive, qualitative and quantitative information on the constituents present in these substances. This detailed information is required both to assess the potential environmental and human health impacts of these substances in normal use and, owing to the variation in their composition, to assess the degree of similarity between substances such that results obtained from toxicity tests can be applied from one substance to another ("read-across").

Naphthas (carbon chain length ~C4-C12), which contain a few hundred constituents, are relatively straightforward to characterise by gas chromatography (GC). Kerosines (~C9-C16), which contain several thousand constituents, and middle distillate substances such as diesel fuels (-C10-C26), which contain hundreds of thousands of constituents, can be characterised with sufficient granularity by comprehensive two-dimensional gas chromatography (GC \times GC). However, it becomes increasingly challenging to characterise the heavier (>C30) petroleum substances such as lubricating oils, heavy fuel oils and bitumens which can contain many millions of constituents. The complexity of such substances not only arises from the exponential increase in isomers with carbon number but also from the more varied chemical functional groups (and multi-functionality) within the constituents present.

ECHA accepts that, for read-across purposes, it might not be possible (or practical) to identify all the constituents present in some UVCB substances and in these cases other approaches for demonstrating similarity between substances can be applied (3). One suggested approach is "fingerprinting" the UVCB substance by providing a relative quantitative overview of the constituents present using an appropriate analytical technique, although a condition of such an approach is that the measurement should cover >95% of the individual constituents present.

There are many publications describing analytical techniques which provide information on the identity of constituents present in the heavier petroleum substances. However, from our perspective, these papers do not provide both qualitative and quantitative information and/or only provide such information for a small fraction of the total substance.

In addition to the need for comprehensive substance-level analysis, targeted analysis of specific constituents is also important and might provide further toxicological insights. Further, regulatory obligations for the analysis of degradation products of UVCB substances require a larger suite of analytical approaches to capture the evolving structures.

The main challenge, therefore, is how to provide detailed and comprehensive, qualitative and quantitative information on petroleum substances constituents, which can then be used for regulatory assessment.



The Concawe All-Constituent Challenge (ACC) project aims to:

- Determine specific analytical approaches that can most fully quantify constituents/constituent groups of hydrocarbon substance streams with carbon ranges >C30
- Determine methods for identifying constituents, in particular those of potential regulatory interest
- Provide information to regulators regarding the limits of analysis of hydrocarbon substance constituents.

Analytical laboratories will be invited to analyse the same set of hydrocarbon substance samples (*i.e.*, gas oil, residual aromatic extract, lubricant base oil, bitumen, heavy vacuum oil and paraffin wax) with the analytical approach of their choice to provide as much quantitative information as possible for the constituents within the samples. Data from each analytical approach will be collated and analysed by Concawe to determine the most appropriate analytical approaches for each of these petroleum substance types.



2. WORKSHOP PROGRAMME AND PRESENTATIONS

Details of the workshop programme and presentations are available in Appendices 2-10.

Regulatory Challenge Session

- Objectives and practicalities of the day. A scene setting presentation by Carol Banner (Science Executive for Substance Identification at Concawe), and the workshop facilitator Glen Carty (REACH & Regulatory Compliance Manager at Shell and chair of the Concawe REACH Management Group).
- What are the requirements for analytical data in REACH substance hazard assessment and the challenges faced with hydrocarbon UVCB substances? A joint presentation from Michał Skowron (Senior Scientific Officer at ECHA) and Carol Banner.
- Regulatory challenges. This panel discussion presented by Delina Lyon (Science Executive for Environment at Concawe) and Nicholas Synhaeve (Science Executive for Human Health at Concawe), engaged workshop participants with two questions:
 - What analytical information do we need to support health and environmental hazard assessments?
 - What criteria does the analytical information need to meet?

The Regulatory challenges session was concluded by a presentation of Michał Skowron "What is ECHA not seeing/not seeing clearly enough as input from Industry?"

All-Constituent Challenge Session

- All-Constituent Challenge: Overview of objectives, approach and participating analytical labs presented by Carol Banner. This was followed by a brief introduction to the workshop posters and analytical capabilities by each of the analytical laboratory representatives.
- Analytical laboratories presented posters describing their analytical capabilities in compositional analysis of petroleum substances. Details of posters are found in Appendix 10.



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Laboratory	Technology	
Biochemical Institute for Environmental Carcinogens (BIU)	Polycyclic Aromatic Hydrocarbons (PAH) by GC/MS	
Intertek (ITS) UK	Field desorption time-of-flight mass spectrometry (FD-TOFMS)	
JPEC Japan	Fourier-transform ion cyclotron resonance (FTICR) - mass spectrometry	
Lommatzsch and Säger	GCxGC and HPLC-GC	
SGS Germany	Derivatisation QTOF-MS, GCxGC FID	
SINTEF	Fourier-transform ion cyclotron resonance (FTICR) - mass spectrometry	
Texas A&M	Ion Mobility Mass Spectrometry (summary only)	
University of Glasgow	2-dimensional gas chromatography (GCxGC)-TOF-MS	
University of Plymouth	Range of chromatography/MS	
University of Southampton	Supercritical fluid chromatography (SFC)-MS, HPLC-MS, GCxGC-MS	
University of Warwick	Fourier-transform ion cyclotron resonance (FTICR) - mass spectrometry	

- An introduction to the breakout sessions was then presented by Glen Carty. Workshop participants in Helsinki were split into 4 groups and online participants into 2 groups to discuss the following questions:
 - What was your key learning from today?
 - Which current technologies can deliver the required data? (Short term delivery)
 - What are the priorities for development of analytical approaches? (Medium to long term delivery)
 - Are there potential synergies between laboratories and complementary approaches?
 - Which requirements still appear unattainable?
 - Feedback was provided by moderators of each of the six breakout groups and summarised by Concawe and ECHA



3. FEEDBACK FROM BREAKOUT GROUP DISCUSSIONS

3.1. REGULATORY CHALLENGES SESSION

There were 130 registered attendees to the meeting, both online and in person. Based on self-reporting during a Mentimeter survey, 6 identified as academia, 16 as regulators, 4 as CRO's, 48 as industry, and 1 with no stated affiliation. Two guiding questions were posed to the attendees:

Q: "What analytical information do we need to support human health and/or environmental hazard assessments?"

A: Workshop participants raised that the analytical information should be:

- Fit for purpose according to the end point being assessed (human health and environmental hazard assessment) and whether read across or direct substance assessment is being applied.
- Comprehensive, *i.e.*, describing the entire substance composition
- Provided for all registered petroleum substances, including heavier substances > C30.
- Describing constituent/constituent group structure (including molecular mass) and concentration.
- Describing the variability in concentration of constituents and/or constituent groups across samples of the same substance.
- Able to distinguish between a variety of structural isomers & presence of functional groups (*e.g.*, double bond equivalent and heteroatoms), hydrocarbon chain position and degree of branching of constituents. This is particularly relevant in support of environmental hazard assessment.
- Obtained with the application of marker substances (including synthetic standards) to provide a means to quantify petroleum substance constituents.
- Able to support an assessment of potential for exposure through constituent bioavailability (lipophilicity/hydrophobicity partitioning).
- Able to support the identification of metabolites and breakdown products of petroleum substances.
- Able to verify the doses of test substances in hazard assessment studies.
- Q: "What criteria does the analytical information need to meet?"

A: Workshop participants considered the following important:

• The analytical information requires sufficient granularity (detailed compositional information), although a definition of "sufficient" was not determined



- The interpretation of analytical data needs to take into consideration matrix effects which may impact the ability to identify / quantify individual or groups of constituents because they are poorly resolved or their ability to ionise is compromised by high concentrations of other constituents. For example, a constituent group may not be identified in a whole petroleum substance sample, but may be detected in a fraction of that same sample.
- The importance of analytical method repeatability and reproducibility was highlighted by participants. In cases where there are analyses of multiple samples per substance for the purposes of read across at a single laboratory in a single experiment, method repeatability and reproducibility may be less important than in cases where studies are done for the purposes of substance identification.
- Appropriate analytical methodology needs to be accompanied by expertise in analytical data interpretation in order to make sense of instrument output (*e.g.*, statistical analyses, multivariate data interpretation).
- A measurement of precision in quantitative analyses. No guidance had been provided on the requirements for precision.
- Speed of analysis was also considered to be important. With such complex substances, detailed analysis and data interpretation can take considerable time. A pragmatic approach is required in order to meet regulatory timelines.

3.2. BREAKOUT SESSION

Feedback from the six breakout groups for each of the five steering questions is summarised as follows:

3.2.1. What was your key learning from today?

The range of analytical capabilities presented by the laboratories at the workshop was acknowledged to be impressive and an open exchange between participants gave good insight into the strengths and weaknesses of each analytical approach. This valuable interaction between analytical laboratories, academia, industry and regulators was a good starting point to understand how such technologies may be applied to support hazard assessments. However, there are limitations in the current technologies such that regulatory needs for comprehensive quantitative analysis of all constituents / constituent groups are not met for the full range of petroleum substances, particularly those with a carbon number range beyond C30. Furthermore, targeted analysis to identify specific hazardous constituents or constituent groups still requires alignment of regulatory requirements with analytical capabilities.

Participants expressed a need to continue this discussion across sectors to further clarify the regulatory requirements in the context of what is practically feasible and to maintain awareness of evolving analytical capabilities.

The approach to be applied in the analysis of petroleum substance constituents needs to be fit-for-purpose. This relates to the specifics of the substance itself including the carbon number range which impacts the choice of analytical methods



(separation and detection). The specific hazard end point and whether read-across in hazard assessment is applied will also determine the required analytical characterisation, for example qualitative analysis of isomeric constituents may support Persistence and Bioaccumulation assessment, while quantitative information on constituent group concentration variability is required to support structural similarity as a basis for read across in hazard assessment.

With this diversity of requirements, further clarity was requested by participants as to what should be characterised (whole substance, groups of constituents, or individual constituents) and the basis for grouping of constituents.

The workshop helped highlight the differences in the analytical requirements to support Annex VI substance identification and sameness for registration within a joint submission and Annex XI Section 15 requirements for supporting substance structural similarity for read-across in hazard assessment. While Annex VI requires standard industry analytical methods applied by registrants to deliver basic quantitative information about carbon number and hydrocarbon class, Annex XI requires more granular information on the concentration of constituent groups and the variability in concentration of these constituent groups across multiple samples of the substance.

Participants at the workshop expressed the need for method standardisation for the methods applied to structural similarity assessment. This is currently possible for existing analytical approaches for substances <C30, *e.g.*, Detailed Hydrocarbon Analysis (DHA) of naphthas (C5-C12), but is not currently the case for analytical techniques such as two-dimensional gas chromatography (GC x GC) applied to gas oils (C12-C30). Analytical methods to support structural similarity of substances above C30 still need to be developed.

Given the complexity of petroleum substances, many with hundreds of thousands of constituents, the impact of matrix effects on analytical characterisation was highlighted at the workshop. Such effects mean that the ability to detect and measure a single constituent or constituent group (*i.e.*, analyte of interest) may be impacted by the presence and concentrations of other constituents. This may prevent effective separation of the analyte of interest from other constituents and/or impact its degree of ionisation and therefore detection by mass spectrometry. Such matrix effects may mean that an inaccurately lower concentration of a constituent or constituent group is measured in a sample of the full substance compared with a fraction of the same sample with fewer constituents.

3.2.2. Which current technologies can deliver the required data? (Short-term delivery)

Participants expressed that the achievement of short-term goals requires, from the outset, a structured approach together with an understanding of the data required by regulators, including key parameters of granularity of constituent group information and precision in quantification and the role of all parties involved (regulators, industry (eco)toxicologists and analytical chemists/data analysts).

The early development of a structured database for the collection, sharing and comparison of data across analytical technologies and sample types (full sample, constituent groups and individual constituents) was noted as a valuable tool in attaining the required characterisation of petroleum substance constituents.



Currently, comprehensive two-dimensional gas chromatography (GC x GC) for substances in the carbon range C6-C30 coupled with hydrocarbon space mapping (visual map of relative concentrations of constituent groups (hydrocarbon class per carbon number) across multiple samples per substance) can deliver what is understood to be the required data to assess substance similarity and compositional variability across samples to support read across and selection of "representative" or "worst-case" substances.

The main priority is on quantitation of petroleum substances constituents and constituent groups in the range >C30. There were diverse opinions expressed by participants on whether current technologies including Orbitrap-MS, ion mobility MS and Fourier Transform Ion Cyclotron Resonance MS can deliver the required data for these heavier substances. It was also considered that one technology alone is unlikely to provide the required data for all petroleum substances.

While whole substance fingerprinting with a range of mass spectrometric technologies can currently provide detailed molecular formulae for many thousands of constituents, in the absence of calibration standards (*e.g.*, synthetic reference compounds), quantitation of these detected molecules is not possible. Participants questioned whether the provision of molecular formulae is sufficient to meet regulatory requirements

The pre-fractionation of petroleum substance samples can help reduce the potential for matrix effects. However, concern was raised around the precision of the fractionation (does a saturate fraction only contain saturates?) and the integrity of fractions impacted by the potential for oxidation/photodegradation during the process and therefore the loss or modification of constituents. Some examples of short-term delivery based on pre-fractionation and coupling of analytical technologies are:

- GC x GC coupled with pre-fractionation by High Performance Liquid Chromatography (HPLC) and detection by mass spectrometry may be able to extend characterisation to the C50 range for alkane constituents such as in paraffin waxes. Aromatic constituents will have a more limited scope, possibly to C40.
- Field Ionisation Mass Spectrometry (FIMS) can be used to characterise saturate and aromatic fractions of Lubricant Base Oils (LBO) in the carbon range up to C40.

3.2.3. What are the priorities for development of analytical approaches? (Medium to long-term delivery)

Workshop participants expressed the following priorities in the medium to long term:

- A need to maintain dialogue across the respective technical disciplines and stakeholders in order to share approaches and understand method practicalities and limitations.
- A recognition that multiple analytical technologies will be required to address any regulatory question. Such developments could include:
 - \circ The application of Super Critical Fluid Chromatography with Flame Ionisation Detection and Mass Spectrometry (SFC FID/MS). This approach should allow



the identification and quantitation of constituents up to carbon number C138.

- The application of a Vacuum Ultraviolet (VUV) detection coupled to GC x GC could improve identification of functional groups and heteroatoms (sulphur and nitrogen containing molecules) within hydrocarbon blocks. Currently the ability to determine structural isomers and functional groups is limited by molecular size.
- The development of alternative ionisation sources for mass spectrometry such as Soft Ionization by Chemical Reaction In-Transfer (SICRIT) cold plasma ionisation and two-step laser ionisation (also known as post ablation ionisation) will also improve ionisation efficiencies of difficult-to-ionise hydrocarbon classes and substances.
- A recognition that high resolution analytical methods may only be available in a few specialised analytical laboratories and not necessarily available in the facilities where hazard testing is performed. In cases where a high-resolution analytical method is required for valid hazard testing, it may be challenging to perform the test under Good Laboratory Practice (GLP) since this generally requires in-house analytical methods and not the use of external laboratory results.
- Develop understanding of alternative approaches to compare data from different samples in assessment of structural similarity and variability.
- Develop better procedures for selection of "representative" and "worst-case" substances.
- Combine and integrate chemical analysis with in vitro and/or in vivo hazard assessment studies.
- Identify key constituents driving hazard effects and an understanding of their mechanism of action.
- A strong recognition of concern regarding the volumes of data that will be generated and to ensure this is aligned with regulatory requirements

3.2.4. Are there potential synergies between laboratories / complementary approaches?

Workshop participants expressed the following potential for synergies between laboratories and / or complimentary approaches

- Participants expressed interest in the range of analytical approaches presented and agreed the workshop and the subsequent All-Constituent Challenge provide an opportunity for groups to learn about the other methodologies which could be a catalyst for future collaborative work including a comparison of data generated using different analytical techniques.
- Further work is needed to understand how to transition in-house methodologies performed by few laboratories worldwide to industry standard methods available to meet the analytical needs to support hazard assessment



• A comparison of whole petroleum substance chemistry and hazard with that of specific hydrocarbon blocks (chemical functionality per carbon number) and that of individual constituents of concern needs to be fit for purpose.

3.2.5. Which requirements still appear unattainable?

The regulatory requirements that workshop participants considered to be currently unattainable were:

- Complete constituent and constituent group analysis in most petroleum substances, with the exception of low boiling point naphthas. The question was raised about the level of granularity required by regulators for comprehensive and quantitative analysis.
- Although possible to generate hundreds of thousands of molecular formulae for constituents present in a UVCB substance, we cannot confidently assign structures to the vast majority of these constituents
- The analytical ability to determine structural isomers and branching structure of individual constituents
- However, participants expressed that once a full understanding of the regulatory requirements is attained, adequate resources and time to address them will be required. Regardless, uncertainties will remain given the challenges highlighted at the workshop, including the lack of synthetic standards for all constituents and the impact of matric effects on constituent separation, identification and quantitation.

3.3. PANEL SUMMARY OF DISCUSSIONS

Anna Steneholm (of TKT Consulting for the Concawe Health Management Group) summarized that substance chemical analysis supports the ultimate goal to achieve effective hazard evaluation by grouping similar petroleum substances and thereby minimising of animal testing. She highlighted that the regulatory expectations were quite different in the contexts of substance similarity to justify read-across (requiring quantitative data on constituent groups for >95 weight % of substance) and of Substances of Very High Concern (SVHC) where as little as 0.02 weight % of a petroleum substance can be of interest.

Delina Lyon reflected that a more structured approach to analytical data generation is required based on the regulatory requirements and environmental hazard assessment needs. Further interdisciplinary and inter-sector discussion are needed to advance in this space. With regard to the analytical technology and hazard assessment output, better data analysis and integration is needed to maximise the value of this work and build a comprehensive understanding of the hazard profile of petroleum substance constituents.

Carol Banner saw potential in the analytical capabilities presented at the workshop to advance beyond C30 in terms of comprehensive and quantitative analysis of petroleum substance constituents or constituent groups. For example, GC x GC may be extended as far as C50 for non-aromatic constituents when coupled with HPLC, and SFC/FID MS may in the future permit the analysis up to C138.

While mass spectrometric detection can yield enormous amounts of molecular formulae (many hundreds of thousands of formulae as possible output from a single



petroleum substance sample), the regulatory requirements for this information are unclear and the challenges to extrapolate these formulae to definitive structures remain.

Quantitation of constituent and constituent group concentration to support structural similarity in read-across justification also remains a challenge. The role of fractionation in sample preparation may be an approach to help reduce matrix effects and improve the potential for identification of structures and possibly quantification. However, sample fractionation in itself impacts the sample integrity and therefore introduce uncertainties into the analysis.

The workshop has started the critical discussion between regulators (who own the information requirements), (eco)toxicologists (who aim to comply with those information requirements) and the analytical laboratories (who have the capabilities to provide the data to support those information requirements). Going forward there is a clear need to better define the requirements, particularly with regard to the granularity of quantitative information on constituent group concentrations to support read across and on the precision of that quantitation. In the longer term, a degree of standardisation in data output and reporting will aid the comparison of data obtained from different technologies to the benefit of all parties.

Michał Skowron of ECHA concluded that ECHA appreciated the exchange of information between analysts, industry and regulators which improves transparency and explains why the regulatory legal requirements exist. The workshop showed analytical developments that could push the current limitations such as the boiling point limitations of GC x GC and the ability to identify alkylated polyaromatic hydrocarbons (PAHs).

With regard to the question on the granularity of quantitative information required on constituent groups to support structural similarity in read-across, ECHA indicated that this required a step-by-step approach to understand what is achievable and then determine whether more resolution is required. Michal acknowledged the different analytical data requirements to support human health and environmental hazard assessment.

In the development of new analytical approaches, ECHA has identified the need to standardise certain methods such as GCxGC & FDMS, to provide a wider pool of industry standard methods (ASTM/IP/EN) for the purpose for generating data for human health & environmental risk assessment in the future. ECHA will continue to push for this but asks industry for their support.

Michał concluded by noting the need to communicate to the wider public in the appropriate terms that ECHA works towards safer use of everyday chemicals using the data discussed today.



4. CONCLUSIONS AND FURTHER WORK

The workshop brought together key stakeholders in the provision and use of analytical data to support the regulatory requirements for human health and environmental hazard assessment of petroleum substances. Discussions at the workshop highlighted the following key areas for further work:

- 1. A need to clarify the granularity of analytical data required to comply with regulations. The response of ECHA to the following questions will help clarify the regulatory requirements in regard to analytical data to support hazard assessment:
 - a. What endpoint specificities are there for analytical data to support hazard assessment?
 - b. What granularity in structural composition data is required for readacross?
 - c. What precision in quantification is required for substance constituents and constituent groups?
 - d. Are standardised methods required for analytical methods supporting hazard assessment?
- 2. Providing the required granular level of compositional information for UVCB substances is very complex. The analytical laboratories and capability of techniques available today may not fully address the requirements of the REACH regulation update from 2022 in this regard. The current limitations in analytical technologies that need to be addressed to maintain alignment with the regulatory framework include:
 - a. The extension of comprehensive and quantitative analysis of constituent groups above C30.
 - b. The development of mass spectrometric output and data interpretation to allow both quantitative and structural information to be determined in the absence of synthetic reference compounds for most constituents.
- 3. Further work in comparing the capabilities of a range of analytical approaches applied to the same set of petroleum substance samples could be supportive in such developments.

The Concawe All-Constituent Challenge project over the course of 2024 will ask analytical laboratories with a range of analytical capabilities in petroleum substance characterisation to provide as much compositional information as possible for the same set of heavy petroleum substance samples. Data provided by each of the laboratories will be compared by Concawe to identify analytical solutions for each substance type to meet the requirements for substance similarity assessment and the identification of hazardous individual constituents.



5. GLOSSARY

Term	Definition
Category	A Concawe system of grouping similar substances together based on process history and boiling point/carbon range
CLP	Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures
CMR	Carcinogenic, mutagenic or reprotoxic.
Constituent	Discrete chemical structure, which is separable from its stereo-, regio- and constitutional isomers
Concawe ACC project	Concawe All-Constituent Challenge project
ECHA	European Chemicals Agency
EINECS	European Inventory of Existing Commercial chemical Substances
Good Laboratory Practice (GLP)	The OECD Principles of Good Laboratory Practice (GLP) ensure the generation of high quality and reliable test data related to the safety of industrial chemical substances and preparations. The principles have been created in the context of harmonising testing procedures for the Mutual Acceptance of Data (MAD)
Hydrocarbon Block	A group of compounds linked by carbon number and/or hydrocarbon class
Mutual Acceptance of Data (MAD)	OECD has developed the Mutual Acceptance of Data (MAD) system, a multilateral agreement which allows participating countries (including non- members) to share the results of various non- clinical tests done on chemicals using OECD methods and principles.
РВТ	Persistent, Bioaccumulative and Toxic.
REACH	Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals.
Read-across hypothesis	Hypothesis on the basis of which property(ies) of target substance(s) may be predicted from source substance(s). This hypothesis must be based on a relationship between structural similarity and the predicted property(ies) and needs to be supported by read-across justification.
Read-across justification	The reasoning and associated supporting evidence that are provided to verify the scientific validity and robustness of the read-across hypothesis.
Soft Ionization by Chemical Reaction In Transfer (SICRIT)	SICRIT® (Soft Ionization by Chemical Reaction in Transfer) is the first real flow- through soft ionization technique in mass spectrometry. In conventional methods the analyte gets ionized before being introduced into the MS.



Substances of Very High Concern (SVHC)	Substance included in the Candidate List established in accordance with REACH Article 59(1).
UVCB	Substance of Unknown or Variable composition, Complex reaction products or Biological materials. Most petroleum substances are UVCBs.
vPvB	Very persistent and very bioaccumulative.

Terms not listed here should be taken as defined in the REACH and/or CLP Regulations.



6. ACKNOWLEDGEMENTS

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- 3. Annex VI substance identification and sameness for registration within a joint submission and Annex XI Section 15



APPENDIX 1: LIST OF PARTICIPATING COMPANIES

AG-HERA CONSULTING ANSES - FRENCH AGENCY FOR FOOD, ENVIRONMENTAL AND OCCUPATIONAL HEALTH & SAFETY BASF BAUA - GERMAN FEDERAL INSTITUTE OF OCCUPATIONAL SAFETY AND HEALTH **BE FPS HEALTH** BIOCHEMICAL INSTITUTE FOR ENVIRONMENTAL CARCINOGENS **BOOTMAN CHEMICAL SAFETY** BOREALIS BP BUREAU FOR CHEMICAL SUBSTANCES CEFAS CEFIC **CEPSA** CONCAWE ECHA - EUROPEAN CHEMICALS AGENCY ENI **ENVIPROADVICE EQUINOR ERA-CONSULT** EUROFINS AGROSCIENCES EUROPEAN COMMISSION DG ENV EUROPEAN COPPER INSTITUTE EUROPEAN WAX ASSOCIATION **EVONIK EXXONMOBIL GUNVOR** HELLENIO ENERGY HSPA - HYDROCARBON SOLVENT PRODUCERS ASSOCIATION HUNTSMAN **IBERCERAS SPECIALTIES IBN NAFEES MEDICAL CENTER IMARA MEDCARE** INA (MOL GROUP) **INTERTEK UK** JAPAN PETROLEUM ENERGY CENTER **JRF GLOBAL** KC PETRO-ANALYTICS LTD KPR&T LABORATORY LOMMATZSCH & SÄGER (LLS) LUKOIL NEFTOHIM BURGAS MOL NESTE NYNAS OWV PCK RAFFINERIE PENMAN CONSULTING



PETROCHINA PLYMOUTH UNIVERSITY RAIN CARBON GERMANY GMBH **REACH CENTRUM** RICARDO ROSNEFT SASOL SF ANALYTICON LIMITED SGS GERMANY SHELL SINTEF OCEAN TECHNICAL UNIVERSITY OF DENMARK TEXAS A&M UNIVERSITY TOTALENERGIES TOTSA TOXCEL TOXICOLOGY KNOWLEDGE TEAM UBA UNIVERSITY OF COPENHAGEN UNIVERSITY OF GLASGOW UNIVERSITY OF SOUTHAMPTON UNIVERSITY OF WARWICK **US EPA ZSCHIMMER & SCHWARZ**



APPENDIX 2: CONCAWE WORKSHOP PROGRAM



Concawe Workshop for an Analytical Technology Exchange to Meet Health & Environmental Regulatory Challenges for UVCBs

> 8 November 2023-ECHA offices, Helsinki & Online 08:30 - 17:30 EET

PROGRAMME

0830-09:00	Registration	Coffee	
09:00-09:15 Welcome & Introduction		Objectives and practicalities for the day	Concawe/ Facilitator
09:15-09:45	Regulatory expectations	egulatory pectations What are the requirements for analytical data in REACH substance hazard assessment and the challenges faced with hydrocarbon UVCB substances?	
• What kind a Regulatory needed and challenges • What valida analytical met		 What kind of analytical data may be needed and why? What validation is required for an analytical method? 	Panel Discussions
10:45-11:00		Coffee Break	
Regulatory challenges		What is ECHA not seeing/not seeing clearly enough as input from Industry?	ECHA



11:20-11:45	Exploring new technologies – introduction to the Concawe All Constituent Challenge	Overview of objectives, approach and participating analytical labs	
11:45-12:45		Networking Lunch	
12:45-13:45	Poster Session	Analytical labs present their capabilities to stakeholders, who build understanding of how Analytic analytical capabilities can address the above-identified laborator requirements.	
13:45-13:55	Meeting the challenges	e Introduction to breakout sessions	
13:55-14:45	Meeting the challenges: Breakout session	Breakout groups discuss how the analytical capabilities may meet the hazard assessment requirements	
1445-15:00		Coffee Break	
15:00-16:15		Breakout group feedback and summary of workshop learning	
16:15-16:30	Break	End of workshop for all except analytical labs	
16:30-17:30	Plenary with analytical labs/Concawe	Plenary with Kick-off analytical and practical considerations for the Concawe All abs/Concawe Constituent Challenge	



APPENDIX 3: OBJECTIVES AND PRACTICALITIES OF THE DAY



Concawe Workshop for an Analytical Technology Exchange to Meet Health & Environmental Regulatory Challenges for UVCBs

8th November 2023 – ECHA, Helsinki Carol Banner Reproduction permitted with due © Concave acknowledgement

Objectives

- Clearly identify the analytical challenges to support REACH requirements for hazard assessment of petroleum UVCB substances
 - Structural similarity for UVCB read across
 - PBT assessment
 - · Review the latest capabilities of analytical labs to meet those requirements



What can be achieved now, in the medium to long term with method development and what is not feasible

- Kick off the Concawe project "All-Constituent Challenge"
 - Analytical labs will demonstrate their capabilities to identify and quantify as many constituents and constituent groups as
 possible in the same set of samples

2

Widen our understanding of which technologies can be applied for different substances

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Requirements for composition data?



Scope of our discussions today

kyllä kiitos 🙂	ei kiitos 😕	
Requirements for analytical data to support hazard assessment	Substance sameness (Annex VI section 2 requirements)	
Analytical capabilities and potential		
	Data modelling	
Quantitation of constituent groups in C30+ petroleum UVCB substances	Classification / thresholds for classification	
Identification of individual constituents of interest in PBT assessment	Regulatory policy / strategy for testing	

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Workshop practicalities

• Emergency evacuation procedure



Workshop practicalities

Hybrid meeting

- Mobile microphones in room for participants in the meeting room
- Online participants enter questions and comments in chat, managed in the meeting room

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Concawe Workshop Morning Programme

09:00-09:15	Welcome & Introduction	Objectives and practicalities for the day	Concawe/ Facilitator
09:15-09:45	Regulatory expectations	What are the requirements for analytical data in REACH substance hazard assessment and the challenges faced with hydrocarbon UVCB substances?	ECHA/Concawe
09:45-10:45	Regulatory challenges	 What kind of analytical data may be needed and why? What validation is required for an analytical method? 	Panel Discussions
10:45-11:00		Coffee Break	
11:00-11:20	Regulatory challenges	What is ECHA not seeing/not seeing clearly enough as input from Industry?	ECHA
11:20-11:45	Exploring new technologies - introduction to the Concawe All Constituent Challenge	Overview of objectives, approach and participating analytical labs	Concawe
11:45-12:45		Networking Lunch	

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To review Posters online

Go to

https://www.concawe.eu/event/concaw e-workshop-for-an-analyticaltechnology-exchange-to-meet-healthenvironmental-regulatory-challengesfor-uvcbs/

or

Scan the QR code and click on Analytical laboratories to review the posters





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12:45-13:45	Poster Session	Analytical labs present their capabilities to stakeholders, who build understanding of how analytical capabilities can address the above-identified requirements	Analytical laboratories
13:45-13:55	Meeting the challenges	Introduction to breakout sessions	Facilitator
13:55-14:45	Meeting the challenges: Breakout session	Breakout groups discuss how the analytical capabilities may meet the hazard assessment requirements	All
14:45-15:00		Coffee Break	
15:00-16:15		Breakout group feedback and summary of workshop learning	Facilitator
16:15-16:30	Break	End of workshop for all except analytical labs	Concawe
16:30-17:30	Plenary with analytical labs/Concawe	Kick-off and practical considerations for the Concawe All Constituent Challenge	Concawe/ Analytical laboratories
		9	

Concawe Workshop Afternoon Programme

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Thank you for your attention



APPENDIX 4: CHALLENGES FACED WITH HYDROCARBON UVCB SUBSTANCES



Challenges faced by petroleum UVCB substances in meeting the requirements for analytical data in REACH substance hazard assessment

Concawe UVCB workshop-8th November 2023- Helsinki

Carol Banner

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Agenda

01

Petroleum UVCB substance characteristics

02

Progress to date and challenges ahead

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->C50+

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Substance grouping based on boiling/carbon range and manufacturing process







Petroleum substance characterization



Progress to date & challenges ahead

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Demonstrating petroleum substance structural similarity to support read across



- Justify why identification of all individual constituents is not technically possible or impractical
- Measure concentration of constituent groups
- Characterise the variability in constituent groups across5 samples
- Characterise >95% of constituent/groups of constituents



Demonstrating petroleum substance structural similarity to support read across



Predominant carbon number range	Technique / Method to demonstrate structural similarity
5-12	PIONADHA
9-16	GC x GC
12-30	GC x GC
20-40	?
20-50	?
20-40	?
30->100	?
	Predominant carbon number 5-12 9-16 12-30 20-40 20-50 20-40 30->100



Example: Hydrocarbon space map of gas oils

Mapping of applicability domain – all samples

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Example: Hydrocarbon space map of gas oils

Selection of representative samples for biological similarity assessment (human health)



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Example: Predictions of environmental toxicity

Selecting samples for testing by using analytical data to predict the most toxic

GCxGC analysisprovides compositional information a substance by dividing up the chemical space into hydrocarbor blocks and the nallocating ercentron centration to each block

Using the target lipid model to predict the toxicity of each hydrocar borblock, it is possible o sum up the toxic unitsperblock to predict the toxicity of the wholes ubstance



Comprehensive and quantitative compositional data on heavier petroleum substances remains a challenge



Category	Predominant carbon number range	Technique Method	/						
<mark>Paraffin Waxes</mark>	<mark>20-40</mark>	?							
Heavy Fuel Oils	<mark>20-50</mark>	<mark>?</mark>							
<mark>Lubricant Base</mark> Oils	<mark>20-40</mark>	?							
Bitumen	<mark>30->100</mark>	?							
Structural s basis for	similarity as read across								
Predicted									
14	environmental toxicity								

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Identification of specific constituent (sub)structures

REACH requires dentification of constituents which are Persistent, Bioaccumulative & Toxic (PBT) or very Persistent & very Bioaccumulativ (av PvB)

Thisrequires nunderstanding f the constituents indthe types of (sub) structures resent in the petrole un VCB substances

Improvedunderstandingf the diversity of availableubstructural featurescan aid in linkingproperties, like biodegradability specificconstituents/hydrocarb**b**hocks



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Thank you for your attention

Carol Banner carol.banner@concawe.eu



APPENDIX 5: REQUIREMENTS FOR ANALYTICAL DATA IN REACH SUBSTANCE HAZARD ASSESSMENT



Annex VI Section 2 – Analytical information

- → 2.3.5. All necessary qualitative analytical data specific for the identification of the substance, such as ultra-violet, infra-red, nuclear magnetic resonance, mass spectrum or diffraction data
- → 2.3.6. All necessary quantitative analytical data specific for the identification of the substance, such as chromatographic, titrimetric, elemental analysis or diffraction data

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Annex VI Section 2 - Composition of a substance

- → 2.3.2. Names of constituents and impurities
- → In the case of a substance of unknown or variable composition, complex reaction products or biological materials (UVCB):
 - names of constituents present at a concentration of ≥ 10 %;
 - names of known constituents present at a concentration of < 10 %;
 - for constituents that cannot be identified individually, description of groups of constituents based on chemical nature;
 - description of the origin or source and the manufacturing process
- → 2.3.3. Typical concentration and concentration range (in percentage) of constituents, groups of constituents that cannot be identified individually and impurities as specified in point 2.3.2

2

4

ECHA

Annex VI Section 2 – Analytical information

→ 2.3.7. Description of the analytical methods or the appropriate bibliographical references that are necessary for the identification of the substance (including the identification and quantification of its constituents and, where appropriate, its impurities and additives). The description shall consist of the experimental protocols followed and the relevant interpretation of the results reported under points 2.3.1 to 2.3.6. This information shall be sufficient to allow the methods to be reproduced

ECHA



5

6

Annex XI Section 1.5 – Structural similarity for UVCB substances

→ Structural similarity for UVCB substances shall be established on the basis of similarities in the structures of the constituents, together with the concentration of these constituents and variability in the concentration of these constituents. If it can be demonstrated that the identification of all individual constituents is not technically possible or impractical, the structural similarity may be demonstrated by other means, to enable a quantitative and qualitative comparison of the actual composition between substances.

ECHA

Annex XI - Structural similarity for UVCB substances

- → Structural similarity is a prerequisite for read-across
- → Establishing structural similarity for UVCB substances
 - Identification of constituents and their concentrations
 - · Variability in concentration of constituents



7

8

Annex XI - Structural similarity for UVCB substances

- → By understanding dis-/similarities in structures of constituents
 - Structures are the same/similar/not
 - · Concentrations are similar vs. different
 - · Variation of concentrations is similar vs. not

ECHA

Annex XIII - PBT assessment

- → Annex XIII: The identification shall also take account of the PBT/vPvB-properties of relevant constituents of a substance
- → R11 guidance Regardless of whether full substance identification is possible or not for the whole composition, the registrant should make efforts for carrying out a PBT/vPvB assessment for all constituents, impurities and additives present in concentrations above 0.1% (w/w). Section R.11.4.2.2 provides further insight into how to carry out PBT/vPvB assessment for fractions of the substance that cannot be fully identified by the registrant

ECHA



Composition - detail and context

- Linear alkanes (n-alkanes)
- Branched alkanes (iso-alkanes)
- Cyclic alkanes (Naphthenics) \rightarrow
 - Mono-cyclic
 Di-cyclic

 - Tri-cyclic
 - Tetra-cyclic
 - Aromatics

-

9

- Mono-aromatics .
- **Di-Aromatics** . **Tri-aromatics**
- Tetra-aromatics .
- Aromatics-Naphthenics
- Mono-aromatics-Naphtenics
- Di-aromatics-Naphthenics

Information on carbon number range for each class. Concentration (typical) and concentration ranges for each reported constituent (group of constituents). Additional information, e.g. PAHs

ECHA

	1	
mic	Thank you hal.skowron@echa.europ echa.europa.eu/subscribe Connect with us	a.eu e
echa.europa.eu/podcasts	in European Chemicals Agency	(O) @one_healthenv_eu
🤟 @EU_ECHA	f @evecha	EUchemicals



APPENDIX 6: REGULATORY CHALLENGES



Analytical technology exchange to meet health & environmental regulatory challenges for UVCBs

Regulatory challenges from Environment & Human Health Perspectives



November 8th, 2023 - Helsinki

Delina Lyon & Nicholas Synhaeve

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Mentimeter

<section-header><section-header><text><text><text><text><text>



Which sector best describes your affiliation?





Hazard assessment for UVCBs

There are 3 basic health & environmental hazard endpoints:









Due to the complexity of hydrocarbon UVCBs, it is not always possible to rely on whole substance hazard data. Based on regulatory guidance, we think about hydrocarbon UVCBs in 3 ways:

whole substance



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hydrocarbon blocks

2





constituents





Hazard assessment for UVCBs



	Toxicity (T)	Biodegradation/ Persistence (P)	Bioaccumulation (B)
Whole substance	- Overall composition for <mark>read-across</mark>	(same as for T)	(same as for T)
Hydrocarbon block (HCB)/Constituent group Arbon block (HCB)/Constituent group - Relative concentration of hydrocarbon blocks		- Relative concentration of HCBs - Structures of constituents within a HCB	(same as for P)
Constituent	- Identify specific constituents of concern	(same as for T) - Substructural features driving P	(same as for T)
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REACH and read-across

 REACH regulation allows for grouping of substances and use of read-across of data between similar substances to fill data gaps

4

- REACH Annex XI
 - General **rules for adaptation**of the standard testing regime set out in Annex VII to X
- Grouping: ECHA RAAF for UVCBs, 2017:
 - "For UVCBs, grouping on the basis of structural similarity may become even more complex, e.g. due to the presence of more constituents in the substances, potentially higher variations in the concentrations of the constituents and sometimes unknown constituents. Such grouping proposals also clearly require extensive explanations and justified criterifor group membership." (p30)



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REACH and read-across

• REACH regulation allows for grouping of substances and use of read-across of data between similar substances to fill data gaps(cont'd)

- Read-across: ECHA Advice on Using Read-Across for UVCB substances 2022:

- "If it can be demonstrated that the identification of all individual constituents is not technically
 possible or impractical, the structural similarity must be demonstrated by other means Therefore,
 the registrant must provide a justification explaining why the other means enable quantitative and
 qualitative comparison of the actual composition between substances." (p10)
- "An example of demonstrating structural similarity by other means could be"fingerprinting" of constituents and their concentrations in compositions using chromatographic methods to provide an overview (fingerprint) of the constituents, particularly where there are common constituents." (p10)
- "Key issues in evaluating the acceptability of the fingerprinting method will be: ... the provision of information on a sufficient proportion of constituents substance (i.e. covering >95 % of the constituents of a substance)..." (p10)
- "...the concentration of constituents in the east five independent samples of the substance aust be measured. The independent measurements must be from different production batches of the substance as produced by all the registrants." (p7)

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What analytical information would support structural (compositional) similarity for UVCBs?

- Whole substance composition for development of the hydrocarbon space map
- Comparison of whole substance compositions for selecting (worst-case) representative sample (s)
- Groups of relevant constituents
- Specific constituents of concern

6

• Other?

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Example: Hydrocarbon space map of gas oils

Selection of representative samples for biological similarity assessment (human health)



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Use of read-across for HH toxicity



Read-across justification for ENV toxicity

Tying chemistry to mechanism of toxicity

Have GCxGC-FID data (hydrocarbonblock) and biomimetic extractionSolid Phase Microextraction(BE-SPME) to measure bioavailability

- Use the hydrocarbonblock data for PetroTox predictions of aquatic and sediment/soil toxicity of available samples
- Use BE-SPME data to identify most bioavailable and thereforetoxic samples
- To allow a conservative assessment, the most toxic sample based on BE SPME and PetroTox will be selected for aquatic, sediment and terrestrial toxicity testing and read-across to the other category members





Without an analytical solution... no read-across

- Huge increase in number of (eco)toxicology tests needed
 I.e. on each substance within a category
- Significant increase of experimental animals needed
- Significant impact on timing and delivery of testing results
- Even in context of correct sample selection for toxicology testing (i.e. without underestimating the hazard), better understanding of (specific) constituents might be required









What kind of (additional to Annex VI) analytical data may be needed for hydrocarbon UVCB hazard assessment?

- e.g., GCxGC data to enable predictions of aquatic toxicity
- e.g., PAH content as key driver of toxicity
- Other?

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Hazard assessment for UVCBs







	Toxicity (T)	Biodegradation/ Persistence (P)	Bioaccumulation (B)
Whole substance	- Overall composition for read-across	(same as for T)	(same as for T)
Hydrocarbon block (HCB)/Constituent group	- Aromatic content (esp. PAHs) for Human Health - Relative concentration of hydrocarbon blocks	- Relative concentration of hydrocarbon blocks - Structures of constituents within a HCB	(same as for P)
Constituent	- Identify specific constituents of concern	(same as for T) - Substructural features driving P	(same as for T)

11

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Additional analytical data needs

Whole Substance

- Alternatives to GCxGC to get greater coverage of the whole hydrocarbon space to support read-across

Blocks

- Improve the justification for hydrocarbon blocking/grouping (e.g., identify chemical classes)

Constituents

- More information on (sub)structural features (e.g., branching)

- Detect and quantify specific constituents (e.g., PAHs, C&L marker substances, etc.)

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What kind of (additional) analytical data may be needed for hydrocarbon UVCB hazard assessment? 154 responses









What criteria does an analytical approach need to fulfil to support hazard assessment?

- Coverage
- Granularity
- Repeatability
- Others?

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Information of interest to Concawe

14

Coverage & granularity of the method

- General (sub)structures of constituents is normally sufficient
- Justify assessment of similarity, especially for use in readacross arguments

> Associated benefits & limitations

- Strengths vs weaknesses of each approach, e.g., mass spec is poorer at quantification
- Reliability / repeatability of a method
- How to confirm identity if standards are not available for (sub)structures



J1046374.pdf (ed.gov)

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APPENDIX 7: COMMENTS ON DATA SUBMITTED TO ECHA



Composition data

- → Where data is included (ideal section 1.2 of IUCLID)
- → Format (e.g. name of a group)
- → Grouping useful

2

- → Analytics format, interpretation, description of a method
- → Unknown constituents
- → What is measured (analyte)
- → Representative constituents of a group (possibility to derive SMILES)

ECHA







APPENDIX 8: INTRODUCTION TO BREAKOUT SESSION



Introduction to Breakout session

8th November 2023 – ECHA, Helsinki

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Breakout Session Questions

- 1. What was your key learning from today?
- 2. Which current technologies can deliver the required data? (short term delivery)
- 3. What are the priorities for development of analytical approaches? (medium to long term delivery)
- 4. Are there potential synergies between laboratories / complementary approaches?
- 5. Which requirements still appear unattainable?

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Breakout groups

Participants in the meeting room to scan the QR code provided Breakout groups F1, F2, F3 and F4 will meet in the four corners on this room

Online participants will be automatically placed in a breakout group Make a note of your breakout group name (V5 or V6) You will need this in case you become disconnected

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Concawe Workshop Afternoon Programme

3

12:45-13:45	Poster Session	Analytical labs present their capabilities to stakeholders, who build understanding of how analytical capabilities can address the above-identified requirements	Analytical labor ator ies
13:45-13:55	Meeting the challenges	Introduction to breakout sessions	Facilitator
13:55-14:45	Meeting the challenges: Breakout session	Breakout groups discuss how the analytical capabilities may meet the hazard assessment requirements	All
14:45-15:00		Coffee Break	
15:00-16:15		Breakout group feedback and summary of workshop learning	Facilitator
16:15-16:30	Break	End of workshop for all except analytical labs	Concawe
16:30-17:30	Plenary with analytical labs/Concawe	Kick-off and practical considerations for the Concawe All Constituent Challenge	Concaw e/ Analytical labor ator ies
		4	

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Scope of our discussions today

kyllä kiitos 🙂	ei kiitos 😕
Requirements for analytical data to support hazard assessment	Substance sameness (Annex VI section 2 requirements)
Analytical capabilities and potential	
	Data modelling
Quantitation of constituent groups in GO+ petroleum UVCB substances	Classification / thresholds for classification
Identification of individual constituents of interest in PBT assessment	Regulatory policy / strategy for testing



Breakout Session Questions

- 1. What was your key learning from today?
- 2. Which current technologies can deliver the required data? (short term delivery)
- 3. What are the priorities for development of analytical approaches? (medium to long term delivery)
- 4. Are there potential synergies between laboratories / complementary approaches?

6

5. Which requirements still appear unattainable?

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report no. 5/24





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Thank you for your attention



APPENDIX 9: CONCAWE ALL-CONSTITUENT CHALLENGE



Concawe All-Constituent Challenge

Concawe UVCB workshop – 8th November 2023 - Helsinki

Carol Banner

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Objectives

- Determinespecific analytical approaches that can most fully quantify constituents/constitue gtoups of petroleuntUVCB substance with carbon range > C30
- Identifyconstituents hat fill datagaps of potentia biodegradatioand bioaccumulatioand humantoxicology interest
- ProvideinformatiomegardinghelimitsofanalysiofpetroleumUVCBsubstanceonstituents

Reference box for additional comments

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Method

Analytical laboratories will be invited to analyse using technology of their choice the same set of hydrocarbon **petroleum** substance samples

- Gas oil
- Residual aromatic extract
- Lubricant base oil
- Paraffin wax
- Heavy vacuum oil
- Bitumen

And provide as much qualitative and quantitative information about constituents in these samples as possible.

Data from each analytical laboratory will be collated by Concawe to assess how well current technologies meet the requirements to support hazard assessment.

3

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Analytical capabilities at the workshop

Laboratory	Presenter	Technology
Biochemical Institute for Environmental Carcinogens (BIU)	Albrecht Seidel	Polycyclic Aromatic Hydrocarbons (PAH) by GC/MS
Glasgow University	CarolineGauchotteLindsay	2-dimensional gas chromatography (GCxGC)-TOF MS
Intertek (ITS) UK	Liam Mills	Field desorption time -of-flight mass spectrometry (FD-TOFMS)
JPEC Japan	Jun Akimoto	Fourier-transform ion cyclotron resonance (FTICR)- mass spectrometry
Lommatzsch and Säger	Martin Lommatzsch	GCxGC and HPLC-GC
Plymouth University	Paul Sutton	Range of chromatography/MS
SGS Germany	ThomasKüttler	Derivatisation QTOF-MS, GCxGC FID
SINTEF	Lisbet Sørensen	Fourier-transform ion cyclotron resonance (FTICR)- mass spectrometry
Texas A&M University	Ivan Rusyn	Ion Mobility Mass Spectrometry
University of Southampton	John Langley	Supercritical fluid chromatography (SFC)-MS, HPLC-MS, GCxGC-MS
University of Warwick	Mark Barro w	Fourier-transform ion cyclotron resonance (FTICR)- mass spectrometry

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4

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To review Posters online

Go to

https://www.concawe.eu/event/concaw e-workshop-for-an-analytical technology - exchange-to-meet-health environmental - regulatory - challenges for-uvcbs/

or

Scan the QR code and click on Analytical laboratories to review the posters







Regulatory challenge session output

5

6

To be considered when reviewing posters

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report no. 5/24





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Thank you for your attention

Carol Banner carol.banner@concawe.eu

APPENDIX 10: ANALYTICAL LABS POSTERS

-------Analytical-Labs-documents (5).zip



.



FIELD IONISATION / DESORPTION TIME OF FLIGHT MASS SPECTROMETRY

intertek caleb brett

AROMATICS

RESULTS

HIGHUGHTS High Mass Resolution: R=30,000 Wide Mass Range: 6000 M/Z High Mass Accuracy Soft Ionisation Ideal for MW Determination C10-C120 Analysis
DEGREE OF SATURATION
All organic compounds have non-integer molecular weights, including the mono-isotopic ions seen in mass spectra:
For example, the following compounds all have the same nominal integer mass of 380:
But accurate masses would be: 380.4382 C ₂₇ H ₅₆ (Z = +2)
380.4382 C ₂₂ H ₅₆ (Z = +2)
$380.2504 C_{29}H_{42} (Z = -26) \\ 380.3443 C_{20}H_{44} (Z = -12)$
380.1565 C ₃₀ H ₂₀ (Z = -105)
380.2504 C ₂₉ H ₃₂ (Z = -25)
380.2538 $C_{ab}H_{ab}$ (2 = -165) 380.1565 $C_{ab}H_{ab}$ (2 = -40) The general formula for hydrographons is presented as C H
Z represents the degree of unsaturation i.e. the number of rings and double bonds in a structure
Z = 2 - (2*RDBE) Z = 2 - (2*7) = 2-14 = -12
Mass Resolution
380.3443 380.4382 380.3443 380.4382 380.3443 380.4382
SAMPLE PREPARATION

In order to analyse samples should be separated into Saturates and Aromatics. This is typically conducted using Liquid Chromatography. A modified version of the method IP 368 allows good separation of most sample types in the analysis range.

Importantly the methodology uses Heptane as a mobile phase which needs removal prior to introduction to the FDMS. This is usually conducted by blowing down with a stream of nitrogen, therefore the sample should have a carbon distribution significantly away from C7, hence the analysis starts at C10.



Other separation techniques can be used and is dependent on the sample undertest. Trials are underway using Chromarods as a medium of separation of Bitumen and heavy residues.

INSTRUMENT

As per the figure above the sample fraction is applied directly to the filament, a current is passed across this filament. Molecules in the condensed phase are ionised to produce molecularions largely M_{τ} , and $[M_{\tau}H]_{\tau}$ ions

The field ionization source uses the same architecture but allows a GC column to be terminated in the proximity of the filament. Molecules in the gas phase are ionised to produce molecular ions largely M_{\star} and $[M_{\pm}H_{\pm}]$ ions

After ionisation the ions pass into the time of flight mass spectrometer.

SATURATES	
HYDROCARBON TYPE	Z NUMBER
Total Alkanes	2
Cycloalkanes	0
Bicycloalkanes	-2
Tricycloalkanes	-4
Tetracycloalkanes	-6
Pentacycloalkanes	-8
Hexacycloalkanes	-10
Heptacycloalkanes	-12
Octacycloalkanes	-14
Nonacycloalkanes	-16
Decacycloalkanes	-18
Undecacycloalkanes	-20
Dodecacycloalkanes	-22

Tridecacycloalkanes Sample data is tabulated into a matrix of Hydrocarbon type/2 number versus carbon number with a limit of detection of 100 ppm. Yield data from the initial separation can be used to factor up the analysis into the whole sample.

.24

HYDROCARBON TYPE	Z NUMBER			
Alkyl Benzenes	-6			
Indanes	-8			
Indenes	-10			
Naphthalenes	-12			
Acenaphthenes	-14			
Acenaphthylenes/ Fluorenes	-16			
Phenanthrenes	-18			
C, H ₂₅₋₂₀	-20 (-10S)			
C,H2622	-22			
C, H ₂₅₋₂₄	-24			
C, H ₂₆₋₂₆	-26 (-16S)			
C, H ₂₅₋₂₈	-28			
C,,H2,,30	-30			
C,,H20-32	-32 (-22S)			
C,,H _{25.34}	-34			
C, H _{20.36}	-36			
C _n H _{2n30}	-38			
C,,H ₂₀₄₀	-40			
C,H20-42	-42			
CnH20-44	-44			
С.Н	-46			



Alternatively, the data can be presented graphically



TARGETED ANALYSIS

We have the capability of performing targeted analysis for analytes such as PAHs to low levels with a GC-MS/MS. The instrument allows for multiple reaction monitoring (MRM) which leads to increased sensitivity for low level compounds in complex mixutures. If the sample is ameanable to direct right to risk of the sample of the sample perparation can be minimal, but the power of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds in the sample of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds is the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds to the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds is the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted compounds the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted set of the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted set of the same set of the MS/MS allows for potential sub-ppm level detection limits for targeted set of the same set of the same

FUTURE DEVELOPMENTS

The instrument is also capable of coupling to a GC, however Field Desorption cannot be used. Instead the instrument operates in Field Ionisation mode. Work is underway to produce a GCxCC-FI-TOF-MS methodology. Initial data using Kerosene type samples compares well with data taken from GCxGC-FID methods using internationally recognized standards.

The eventual goal is produce a method in which a sample can be tested from C10-C120 without separation















Comprehensive gas chromatography (GCxGC) with optional prefractionation into saturated & aromatic hydrocarbons via HPLC

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Method description in brief

The sample extracts are analysed via comprehensive gas chromatography (GCxGC).

Injection: PTV on-column Columns: Reversed setup (1st dimension: mid-polar, 2nd dim.: apolar) Modulation: Cryogenic Detection: FID or MS

The GCxGC is increasing the separation power by a second dimension. This enables a chromatographic separation of hydrocarbon subgroups. A quantification can be performed via FID with internal standards (one point calibration for target and non-target screenings) instead of conventional calibration. An identification of separated single substances and subgroups can be performed via TOF-MS.

Previous to GCxGC, a HPLC fractionation can be performed to separate saturated and aromatic hydrocarbons (MOSH/MOAH methodology). Additionally, the HPLC fractionation enables a clean-up for matrix components (e.g. triglycerides) in environmental and food samples.

Applicability of method Carbon number: C8 – C40 (*nC8 – nC50*)

Internal Standards (IS) with negligible coelution

Saturated hydrocarbons:

iso-Alkanes & n-alkanes (**n-/iso-P**) Monocyclo-alkanes (N) Dicyclo-alkanes (DN) Tricyclo-alkanes (TN)

Aromatic hydrocarbons: Monoaromatics (MoAr) Naphthenic Monoaromatics (NMoAr) Diaromatics (DiAr) Naphthenic Diaromatics (NDiAr) Triaromatics (TriAr) Tetraaromatics (TetAr)



3D GCxGC plot:



2D GCxGC plot









	n-P	Iso-P	N	DN	MoAr	NMoAr	DiAr	NDiAr	TriAr	TN	Total
C8	0.178	0.367	0.391	0.020	1.174						2.13
C9	0.352	1.249	0.879	0.274	3.279	0.253					6.29
C10	0.407	1.657	1.268	0.487	2.983	1.280	0.041	2			8.12
C11	0.509	1.543	1.230	0.485	1.840	2.318	0.220				8.15
C12	0.616	1.405	1.087	0.754	1.168	2.493	0.498	0.003			8.02
C13	0.880	1.593	1.445	1.007	0.886	1.938	1.074	0.028			8.85
C14	1.411	1.788	1.925	1.836	0.945	1.590	0.717	0.315	0.014		10.54
C15	2.098	2.685	2.444	1.529	0.911	1.441	0.647	0.341	0.045		12.14
C16	2.147	2.494	2.305	1.166	0.802	1.300	0.525	0.226	6		10.96
C17	1.844	2.387	2.243	0.935	0.673	0.794	0.413				9.29
C18	1.405	1.745	1.788	0.693	0.551	0.545					6.73
C19	0.966	1.910	1.129	0.315	0.359	0.231					4.91
C20	0.334	1.262	0.408	0.061		49.03.025	S				2.06
C21	0.041	0.185	0.081	0.005							0.31
C22	0.003	0.027									0.03
C23											0.00
Total	13.19	22.30	18.62	9.57	15.57	14.18	4.14	0.91	0.06	1.46	100.00



SGS Germany – Oil analysis

HIGH TEMPERATURE GC



- Using this method, molecules up to 120 carbons, 750 centigrade can be found
- Relative amounts can be given by integration in sections of boiling point

GCXGC

 Alkenes up to 36 carbons can be detected with this method, focused on Diesel

 Alkenes can be seperated from mono-, di- and tri-aromatics





DERIVATISATION AND HPLC

• Circumventing the problem of thermical evaporation the hydrocarbons can be derivatized to introduce polar groups.



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Quantification of bitumen constituents by FT-ICR-MS – is it achievable?

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The toolkit

SINTEF *Ocean and *Industry, Tro Concawe, Brussels, Belgium Nynas, Antworp, Belgium SF Analyticon, Cheshire, England

The challenge

- Bitumen, or asphalt is a highly viscous petroleum-derived substance. While it occurs naturally, it is commonly produced as a residue after distillation of crude oils. In essence, bitumen is a very complex mixture of (mostly) unresolved chemical constituents. A large fraction of bitumen is expected to be hydrocarbons (aliphatic and aromatic), but a fraction also contain nitrogen (N), sulfur (S) and oxygen (O)
- compounds. Due to the production method, it is expected that most chemical consitutents are 'heavy' (large, complex molecules with high boiling points). Most commonly used analytical techniques such as GC-MS and LC-MS are hardly applicable to bitumen due to either the high boling point (GC-MS) or the expected high content of apolar compounds (LC-MS).

Analytical strategy

- The primary aim of the presented work was to identify a suitable analytical strategy to unravel the chemical composition of bitumen. A secondary objective was to evaluate the potential for FT-ICRMS analysis to be used for *quantification* of relative compound or compound group concentrations within a sample. Two different approaches to SARA fractionation was applied:, 1) Methodology from ASTM D4124 and 2) *n*-hexane precipitation of asphaltenes followed by LC-separation of the maltene (SAR) fractions. The mass yield of each fraction was determined gravimatrically. Whole substance bitumen and all resulting fractions were analyzed by FT-ICRMS in both positive atmospharic pressume photiopolizion (ASPL) and negative alcreograve (FSL)
- positive atmospheric pressure photoionization (APPI+) and negative electrospray (ESI-) modes. Accurate mass data was converted to molecular formulae and exported for further manipulation in R software.

Repeatability of fractionation and analysis

- Fractionation and analysis was performed in triplicate with acceptable repeatibility. Relative standard deviations of gravimetric mass yield of fractions was in the ranges 1-S and 15-40% for the LC- and ASTM-method, respectively. For the APPI FT-ICRMS data, the mean standard deviation in determination of total abundance per chemical class was 7%, and the same for number of masses detected within each sample was 15%.

SARA who?

 The mass yield of each fraction by each method was compared to the data obtained using the TLC-fractionation (IP469(. 3² 51 three methods gave different results, with the largest discrepancy in distribution between the aromatics and resins fractions between the two methods applied in this work and the standard method.



Compositional data of bitumen and fractions

• In the current study, only APPI(+) mode analysis provided reasonable compositional data. ESI(-) had a low number of detected masses for all samples. This indicates low prese complex organic acids. In the following, only APPI data will be discussed.



- Fourier Transform Ion Cyclotron Resonance Mass Spectrometry (FT-ICRMS) with its to date not challenged mass resolution (>100,000), allows accurate mass determination Index of challenged mass resolution (100,000), allows accurate mass determination and elemental composition identification. Depending on the selected ionization technique, the method is applicable to a wide array of analyte sizes and polarities. As such, it lends itself to the *characterization* of very complex samples – and to compare variation in composition of such samples. It does not rely on compounds being both amenable to and stabile throughout an online chemical separation, overcoming challenges observed in e.g., gas chromatography-based techniques. When targeting detection of the highest number of compounds in a very complex sample – fractionation of the sample may be useful to simplify the matrix of each fraction – thus revealing the identity of the maximum number of analytes. **SRA** (saturates, aromatics, resins, asphaltenes) fractionation is a relatively simple industry standard method that has been applied to petrogenic samples for decades, and in combination with FT-ICRNS for years. Currently, SARA fractionation remains a standard method to characterise the composition of bitumen samples.

Matrix suppression?

- The number of detected masses resulting from the bitumen was overall higher after
- The number of detected masses resulting from the bitumen was overall higher after fractionation than when analysing the whole substance. The LC-method provided the highest number of masses, and also a higher total abundance of measured masses. A possible explanation is that the LC-method fractionation most evenly distributed bitumen mass between four fractions, meaning each fraction was less complex than bitumen and several of the ASTM fractions.



Figure 4 Comparison of total abundance of all m ses (right) m d number of ma

Elemental composition

The elemental composition of the bitumen sample was determined by standard The elemental composition of the buttlene sample was determined by standard methods including ASTM DS291 (Carbon, Hydrogen), ASTM DS768 (Nitrogen); MT/ELE/17 (Oxygen) and MT/ELE/05 (Sulfur). In addition, composition of each FT-ICR-MS identified constituents in combination with their relative abundance was used to calculate an approximated elemental composition of each fraction after analysis



he standard methods, and as det tributions of four SARA fractions Figure 5 Comparison of elemental composition as dete analysis of bitumen full substance or after summina

Observations

- ervations: N-compounds suppressed in full substance analysis, more 'visible' in fractions ASTM method "exaggerates" presence of nitrogen compared to other methods Sulfur least comparable between FT-ICRMS data and elemental analysis More oxygenated compounds in all APPI analysis than elemental analysis

Preliminary conclusions

- The methodology demonstrated good repeatability for both fractionation and analysis. The methodology demonstrated good repeatability for both fractionation and analysis Fractionation leads to higher total abundances and a different compositional picture compared to analysing the bitumen sample directly. Different fractionation techniques gives different results. So far this work has focused on proof-of-concept to one sample, and there is a lack of statistical power to draw conclusions.

Further work to tackle the challenge of quantification

- In an ideal (unrealistic) scenario there would standards and response factors for 'all' In an ideal (unrealistic) scenario there would standards and response factors for 'all' compounds or at least all 'representative' structures, but this is not achievable in the foreseeable term due to the number of potential chemicals and chemical groups in bitumen. To overcome this, whether or not a defendable semi-quantitative approach possible to achieve needs to be investigated. Further challenges that will to be addressed are 1) the extent of ion suppression and matrix effects by analysis of further bitumen samples, 2) dealing with ionization and response discrimination based on chemical structure with a selected subset of representative compounds spiked into varying matrix complexity. approach is

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