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# A rule-based screening environmental risk assessment tool derived from EUSES

Frederik A.M. Verdonck <sup>a,\*</sup>, Geert Boeije <sup>b</sup>, Veronique Vandenberghe <sup>a</sup>, Mike Comber <sup>c</sup>, Watze de Wolf <sup>d</sup>, Tom Feijtel <sup>b</sup>, Martin Holt <sup>e</sup>, Volker Koch <sup>f</sup>, André Lecloux <sup>g</sup>, Angela Siebel-Sauer <sup>h</sup>, Peter A. Vanrolleghem <sup>a</sup>

a Ghent University, BIOMATH, Applied Mathematics, Biometrics and Process Control,
Coupure Links 653, B-9000 Gent, Belgium

b Procter & Gamble, Temselaan 100, Strombeek-Bever B-1853, Belgium

c ExxonMobil, Hermeslaan 2, Machelen 1831, Belgium

d DuPont, A. Spinoystraat 6, Mechelen B-2800, Belgium

c ECETOC, Avenue van Nieuwenhuyse 4, Box 6, Brussels B-1160, Belgium

f Clariant, Dept Product Safety, Building D 787, Frankfurt am Main 65926, Germany

EURO CHLOR, Avenue Van Nieuwenhuyse 4, Box 2, Brussels B-1160, Belgium

h BASF, Ludwigshafen, Germany

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#### Abstract

Within the context and scope of the forthcoming European Union chemical regulations (REACH), there is a need to be able to prioritise the chemicals for evaluation. Therefore, a simple, pragmatic and adequately conservative approach for the identification of substances of very low or no immediate concern at an early stage is presented. The fundamental principles and basic concepts are derived from the EU Technical Guidance Document and EUSES, and are translated into an easy-to-use rule-based system. For this development, the effect on risk characterisation ratios (RCRs) of the key environmental parameters in EUSES was quantified (taking into account several standardised chemical release scenarios). Using statistical analysis, ranges were identified for each key parameter, within which the end result of the assessment was not significantly affected. This information was then translated into a lookup table from which environmental risk characterisation ratios can be directly read as a function of a few parameters.

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# 1. Introduction

\* Corresponding author. Fax: +32 9 264 5937. *E-mail address:* frederik.verdonck@biomath.ugent.be
(F.A.M. Verdonck).

Increasing concern that current EU chemicals policy does not provide sufficient protection and that less than 50 high priority substances underwent a risk assessment in the past 10 years (Bodar et al., 2003) led to an EU

Commission review of the current policy on chemicals. A new system called REACH (Registration, Evaluation, Authorization of CHemicals) has now been proposed (CEC, 2003). The aim of REACH is 'to establish a single coherent system focusing public resources on those substances where, according to experience, the involvement of authorities is indispensable and the added value in terms of provision of safety is substantial'.

Within the context and scope of the forthcoming chemical regulations (REACH), there is a need to be able to perform risk assessments on 30000 chemicals manufactured in or imported into Europe. Currently when the environmental exposure assessment is performed in accordance with the EU Technical Guidance Document (TGD) or via EUSES software requires many data acquisitions and consequently can absorb considerable time and resource allocation. Therefore, there is a need for a pragmatic and adequately conservative (i.e. no false negatives) approach, that shares the same fundamental principles and basic concepts and methodology as the TGD (and EUSES) but allows for a ready identification of substances of very low or no immediate concern. The goal of this paper is to quantify the effect that key environmental parameters in the EUSES model have on risk characterisation ratios (RCRs) of the compartment of concern, taking into account several standardised chemical release scenarios. Further, the paper will describe how this information was used to develop a pragmatic approach in the format of a simple lookup table with RCRs.

# 2. Methodology

#### 2.1. Key drivers of EUSES risk assessment

#### 2.1.1. Complexity of EUSES model

The fundamental principles and methodology of the EU Technical Guidance Document (TGD) for risk assessment of new and existing substances (EC, 1996b; ECB, 2003b) is implemented in the computer program EUSES (European Union System for the Evaluation of Substances). This was designed to be a decision-support system for the evaluation of the risks of substances to man and the environment. The documentation and program can be obtained from the European Chemicals Bureau, Ispra, Italy (EC, 1996a).

The main outputs of EUSES are local and regional risk characterisation ratios (RCRs) for several environmental compartments (air, surface water, sediment, soil, biota). A RCR is the ratio of the predicted environmental concentration (PEC) and the predicted no effect concentration (PNEC). A substance is potentially of concern when the RCR is larger than 1. The core EUSES model (without the embedded models Simple

Treat, Simple Box and the effect and risk characterisation) requires 466 input parameters, 961 connections between parameters and 132 defaults (Berding et al., 1999). In addition, the number of emission scenarios is large because an emission scenario is determined by a combination of one of the four main categories (MC), one of the 15 industry categories (IC) and one of the 55 use categories (UC). The MCs were intended originally to provide a general impression of the relevance of the exposure during the whole life-cycle of the chemical. In the context of environmental risk assessment, MCs are often used to characterise release scenarios for the estimation of emissions to the environment at individual stages of the life-cycle, i.e. at production, formulation and industrial/professional use. They can therefore be allocated to release fractions, which are used as default values where specific information is lacking. The four MCs are (I) "Use in closed systems", (II) "Use resulting in inclusion into or onto a matrix", (III) "Non-dispersive use" and (IV) "Wide dispersive use" (EC, 1996b; ECB, 2003b). The ICs (Industrial Categories) specify the branch of industry (including personal and domestic use, and use in the public domain) where considerable emissions occur by application of the substance as such, or by the application and use of preparations and products containing the substance. The UC (Use Category) specifies the specific function of the substance.

It can be concluded that EUSES is a highly complex model. Running this model appropriately requires a significant amount of substance-specific data as well as a thorough understanding of release and emissions scenarios. As such, in practice the EUSES model is only useable for priority substances (for which a large and complete data set is available), and can only be handled by experienced risk assessors.

#### 2.1.2. Key drivers of EUSES model

Some input parameters in EUSES have a more important contribution to the RCRs than others. Thus in attempting to simplify the exposure assessment these key drivers need to be identified. In literature, some sensitivity analysis on EUSES has already been performed to identify these key parameters.

In Jager et al. (1997, 1998, 2000), tonnage and the release fraction (based on the release scenario) were identified as important input parameters for the exposure assessment of the aquatic compartment (water and sediment), the sewage treatment plant and the atmospheric exposure. Biodegradability can be important in almost every compartment. The organic carbon—water partition coefficient ( $K_{oc}$ ) and the bioconcentration factor (BCF) are important in respectively the terrestrial compartment and the fish and worm eating predators. Both  $K_{oc}$  and BCF are highly correlated with the octanol—water partitioning coefficient ( $K_{ow}$ ) (Schrap and Opperhuizen, 1990).

Table 1 Parameters of the production and wide dispersive use scenario

Local	Point source or production scenario	Wide dispersive or private use scenario	Unit
Local direct emission to air	6.85E-3	0	kg/d
Local emission to wastewater	266.8E-3	0.542E - 3	kg/d
Number of days for emission	365	365	d
Fraction to air	0.025	0	[-]
Fraction to wastewater	0.974	0.99	[-]
Fraction to industrial soil	0.001	0.01	[-]
Fraction of the main local source <sup>a</sup>	1	0.002	[-]

<sup>&</sup>lt;sup>a</sup> Conversion factor from regional to local emission.

Berding (2000) carried out a local sensitivity analysis on the estimation of regional background concentrations for a number of substances. It was not possible to link classes of substances with particular physicochemical and biodegradation properties to sensitivities of input parameters. Nevertheless, some correlations between model parameters and sensitivities could be established (Berding, 2000). The lower the degradation rate in a compartment, the higher the sensitivity to the physicochemical data. The sewage treatment plant model plays only a minor part in calculating regional background concentrations. A sensitivity analysis on the local PEC, which is always higher and therefore more relevant than the regional PEC, was not performed.

Further, volatility is a critical parameter for the exposure assessment in case of highly volatile substances (as these substances will eventually end up in the atmospheric compartment rather than the aquatic or terrestrial).

Consequently, the key parameters for an environmental risk assessment are: on the exposure side: tonnage, release scenario, biodegradability, lipophilicity (octanol/water partitioning) and volatility; and on the effects side: ecotoxicity. Release scenario and biodegradability are specified in EUSES as categorical (respectively nominal and ordinal) parameters. All other key parameters are continuous variables.

#### 2.2. Effect of key parameters on EUSES output

#### 2.2.1. Release scenarios

In EUSES (and the TGD), a large number of release scenarios are defined (A/B Tables in the TGD, dealing with emissions at different life cycle stages, depending on a chemical's industry and use category). Essentially, these scenarios can be reduced to two distinct release options: point source and wide dispersive release. All release scenarios are effectively linear combinations of these 2 basic options, with a different weighting of the two (EC, 1996b; ECB, 2003b).

In this exercise, the two options for release were production (point source emission assuming 100% release) and wide dispersive use (private use, based on the

TGD detergent scenario IC5/UC9). The parameters of the two scenarios can be found in Table 1.

The release fractions presented in Table 1 can be overly conservative especially for particular uses such as intermediate chemicals for which emissions are extremely low. The release scenarios could therefore be more refined based on the Main Category (MC). In order to determine a conservative and representative release fraction for each MC, a quantification of all possible release fractions (defined in the A tables of the TGD) is needed. In Verdonck et al. (2003), an attempt was made to characterise the probability distribution of release fractions per MC. However, no information about the frequency of occurrence of specific scenarios (industry and use categories, tonnage, classes of physico-chemical properties) in the overall chemical universe was available. It was concluded that an extensive database of chemicals and their use scenarios would be needed to successfully conduct this analysis.

### 2.2.2. Parameters with linear effect

The effect of tonnage and ecotoxicity on RCR is easily predictable because the tonnage is linearly related to the RCR and the PNEC is inversely related to the RCR. If, for example, tonnage is doubled, RCR is also doubled. Similarly, if the predicted no effects concentration (PNEC) is decreased twofold, the RCR will be doubled. As the effect of these parameters is highly transparent, it was not further assessed in this paper. The PNEC for the aquatic compartment was set to 1 µg/l. PNECs for other compartments were calculated based on the partition distribution theory as described in the TGD. In this way, the PEC was always compared to its proper PNEC for each compartment.

#### 2.2.3. Parameters with non-linear effect

The lipophilicity (expressed in the octanol/water partitioning coefficient or in short  $K_{\rm ow}$ ) is a continuous variable, ranging for the log transformed value from less than 0 (highly hydrophilic) to larger than 6–7 (highly hydrophobic).  $\log K_{\rm ow}$  has a continuous effect on the RCR except for a step-increase in the RCR where

 $\log K_{\rm ow}$  equals 5 due to specific correction factors in the EUSES model that are activated if  $\log K_{\rm ow}$  is larger than or equal to 5 (EC, 1996b; ECB, 2003b).

Volatility (expressed as the air/water partition coefficient ( $K_{\rm aw}$ ) or dimensionless Henry's Law Constant (H)) is a continuous variable that ranges from very low (close to 0) to very high (order of magnitude 10E+6). The effect of H on the RCR is especially meaningful when the environmental compartment of concern is changed due to H. Henry's law constant is equal to the ratio of the vapour pressure and the water solubility (SOL). In the EUSES model the Vapour Pressure (VP) is used instead of the Henry's law constant.

The dependence of the water solubility (SOL) on the octanol-water partition coefficient ( $\log K_{\rm ow}$ ) was taken into account by using the QSAR of Hansch et al. (1968) to calculate solubility from  $K_{\rm ow}$ :

$$\log(SOL) = -1.214 * \log K_{ow} + 0.85$$

where SOL is the water solubility in mol/l.

This way, unrealistic combinations of  $\log K_{\text{ow}}$  and SOL were avoided.

For biodegradability, four standard options are available in EUSES: non-biodegradable, ultimately (inherently) biodegradable, readily biodegradable failing the 10-day window, and readily biodegradable. The effect of these four options was examined, and a first screening indicated that only two options really needed to be considered: readily biodegradable and non-biodegradable. The other two options are intermediates of these two extremes, with results closest to the 'non-biodegradable' option.

#### 2.2.4. Other (fixed) EUSES input parameters

The properties of the hypothetical substance 'hypotheticum' (as described in the publications on the SimpleTreat model, Struijs et al., 1991) were used. The EUSES default parameters were used as much as possible. The physico-chemical properties of hypotheticum, can be found in Table 2.

Table 2 Physico-chemical properties of hypotheticum

Physico-chemical properties	Symbol	Value	Unit
Melting point		-35	°C
Molecular weight		200	g/mol
Octanol-water	$\log K_{\rm ow}$	Variable	[-]
Water solubility	SOL	Dep on $K_{ow}$	mg/l
Vapour pressure	VP	Variable	Pa
Predicted no effect	PNEC	0.000001	kg/m <sup>3</sup>
concentration (aquatic) <sup>a</sup>			

<sup>&</sup>lt;sup>a</sup> PNECs for other compartments are calculated according to the partition distribution theory.

#### 3. Response analysis

#### 3.1. Response plots

Based on the identification of the EUSES key parameters, it was decided to investigate the effect of two release scenarios (wide dispersive use and point source), two biodegradation options (readily and non-biodegradable), the continuum of  $\log K_{\rm ow}$  and the continuum of  $\log {\rm VP}$  on the RCR<sub>max</sub>. RCR<sub>max</sub> is the maximum local RCR found for either the aquatic, the terrestrial or the sediment compartment, i.e. the compartment of most concern.

Response plots are three-dimensional displays of a response variable (RCR<sub>max</sub> in this case) on the regular grids of the explanatory variables ( $\log K_{\rm ow}$  and VP in this case). A Monte Carlo type of analysis was used to create response plots. Uniform distributions were assumed for  $\log K_{\rm ow}$  and  $\log$  VP with their respective ranges 0–7 and –2 to 6. Independent random samples are then taken from each distribution in several runs (using the efficient sampling algorithm Latin Hypercube (McKay, 1988)). In each run, RCR<sub>max</sub> is calculated using the EUSES model. The water solubility is also varied based on  $\log K_{\rm ow}$  as described above. After many runs, enough data is gathered to construct the response plots.

The result of these four scenarios is represented as a series of three-dimensional plots, representing the  $RCR_{max}$  (for a given tonnage, ecotoxicity, release scenario and biodegradability) in one axis as a function of  $log K_{ow}$  and log VP in the remaining axis in so-called response plots.

Next, based on the shape of the response plots, the continuum of combinations of  $\log K_{\rm ow}$  and VP was divided into a limited number of fields in the parameter space, within which distinctive groups of the RCR<sub>max</sub> occur. This division was the basis for the creation of the RCR<sub>max</sub> lookup table.

The EUSES program is a so-called 'closed software' making it impossible to perform an automatic Monte Carlo or sensitivity analysis (Berding, 2000) as the EUSES software needs to be controlled in order to automatically assign different values for  $\log K_{\rm ow}$  and  $\log {\rm VP}$ . For this, an unofficial spreadsheet version of EUSES was made available by RIVM for this research (RIVM, 2003) <sup>1</sup>. This EUSES spreadsheet was benchmarked against the official EUSES program, and was found to be a sufficiently accurate surrogate. The @RISK package (Palisade, 2002) was used for the Monte Carlo analysis in Microsoft Excel. The sampled inputs together with the simulated output (RCR<sub>max</sub>) are stored and after

<sup>&</sup>lt;sup>1</sup> RIVM does not take responsibility on the performance of the unofficial EUSES spreadsheet.

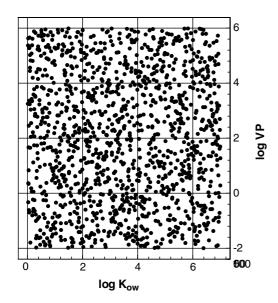


Fig. 1. Thousand sampled points in the  $\log K_{ow}$ - $\log VP$  space.

the simulations those data were introduced in Tecplot (Dundas Software, 2001) to obtain a three-dimensional view of the results. The number of Monte Carlo simulations was set at 1000. Fig. 1 shows 1000 combinations of  $\log K_{\rm ow}$  and  $\log {\rm VP}$  are sufficient to be randomly distributed over the parameter space of  $\log K_{\rm ow}$  and  $\log {\rm VP}$  while totally covering the range for all scenarios.

In Fig. 2, the effect of  $\log K_{\rm ow}$  and  $\log {\rm VP}$  on the RCR<sub>max</sub> is illustrated. On the basis of those figures a division is made in 4 distinct groups of the RCR<sub>max</sub>. For  $\log K_{\rm ow}$ , two distinct groups can clearly be discriminated:  $\log K_{\rm ow}$  larger and smaller than 5. For  $\log {\rm VP}$ , two groups can also be distinguished:  $\log {\rm VP}$  larger and smaller than 0, as for  $\log {\rm VP}$  larger than 0, the RCR<sub>max</sub> decreases significantly.

# 3.2. RCR lookup table

For each defined class of  $\log K_{\rm ow}$ ,  $\log {\rm VP}$ , release scenario and biodegradability, a distribution of RCR<sub>max</sub> values was found. The maximum, 95th percentile and median were calculated for each class. The RCR<sub>max</sub> summary statistics for two release scenarios (production and private use), two biodegradability classes (readily and non-biodegradable), two classes of  $\log {\rm VP}$  and two classes of  $\log K_{\rm ow}$  can be found in Table 3. Note that the RCR<sub>max</sub> values of the private use scenario differ approximately a factor of 0.002 compared to the RCR<sub>max</sub> values of the production scenario. This corresponds with the different fractions of the main local source (respectively 0.002 and 1).

The RCR<sub>max</sub>s in the lookup table were determined with a tonnage of 1 tonne/year and a PNEC of 1 µg/l.

But since the RCR is linearly related to tonnage and ecotoxicity, the RCR<sub>max</sub>s from the lookup table can easily be adjusted to other tonnages and PNEC<sub>aquatics</sub> by using the following simple transformation rule:

$$\begin{split} RCR_{max,tonnage,PNEC} = \frac{RCR_{max,lookuptable} \cdot 1 \ \mu g/l}{1 \ tonne/year} \\ \cdot \frac{tonnage \ (tonne/year)}{PNEC \ (\mu g/l)}. \end{split}$$

#### 3.3. Example

An example is given for the substance acrylaldehyde (CAS No. 107-02-8). Substance specific information on acrylaldehyde was downloaded from the EU Risk Assessment Report at the ECB website (2003a) and can be found in Table 4. The information needed for application of the lookup table is also listed. The RCR<sub>max</sub> from the lookup table is 2.12 (95th percentile is taken). Transforming this RCR<sub>max</sub> to a tonnage of 100000 tonnes/year and PNEC<sub>aquatic</sub> of 0.1  $\mu$ g/l gives an RCR<sub>max</sub> of 2120000. This indicates that further (more detailed) risk assessment is required. The example demonstrates that only a limited amount of information and only the simple lookup table and formula is needed to calculate a worst case risk characterisation ratio.

## 4. Preliminary validation

A preliminary validation was performed in order to explore the conservativeness of the developed lookup table. The approach was applied on 41 chemicals which were identified by the authorities as a priority for a detailed and comprehensive risk assessment. The data used were extracted from the current draft and finished EU Risk Assessment Reports (RAR) on these chemicals (downloaded from ECB, 2003a). The outcome was then compared with the risk assessment outcome based on the full EUSES assessment. The RARs indicated that all chemicals had a RCR<sub>max</sub> larger than one. The screener, based on the proposed lookup table (95th percentiles were used) indicated a potential concern for all chemicals and therefore required further assessment for all chemicals.

As such, the preliminary validation exercise has demonstrated that the substances that were selected as priority chemicals within the EU existing substances work, would also trigger further risk assessments when applying the lookup table approach. This indicates there may be a low risk of false negatives.

Clearly, a more extended validation study is needed based on a more diverse database of chemicals (with representatives from all main, industry and use categories and with different physico-chemical and biodegradation

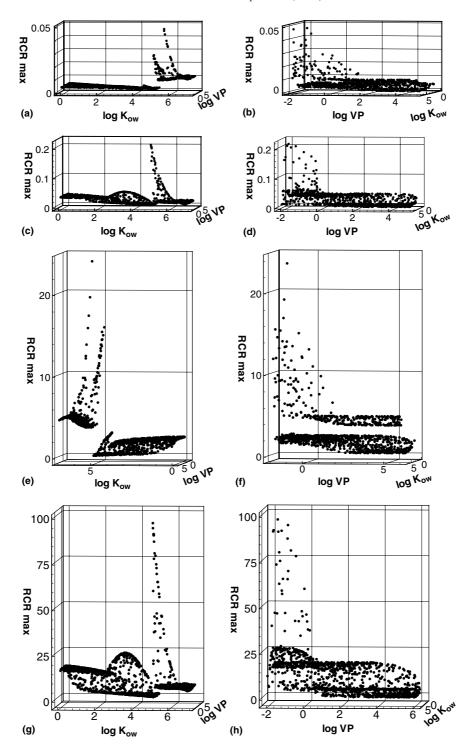


Fig. 2. Three-dimensional view of  $\log K_{\rm ow}$ ,  $\log {\rm VP}$  and RCR<sub>max</sub> (tonnage = 1 tonne/year, PNEC = 10  $\mu g/l$ ). (a,b) Private use, readily biodegradable; (c,d) private use, non-biodegradable; (e,f) production use, readily biodegradable; (g,h) production use, non-biodegradable.

properties) in order to further assess both absence of false negatives and the limited occurrence of false positives. In particular, the database should also contain chemicals of no concern, with  $RCR_{max}\ smaller$  than

 $\log K_{\rm ow}$ logVP Production scenario Private use scenario Readily biodegradable Non-biodegradable Readily biodegradable Non-biodegradable  $0 \rightarrow 5$  $-2 \rightarrow 0$ 2.01 - 2.24 - 2.6716.80 - 26.04 - 26.730.0040 - 0.0043 - 0.00500.034 - 0.052 - 0.054 $0 \rightarrow 6$ 1.51 - 2.12 - 2.196.29 - 16.82 - 21.530.0034 - 0.0043 - 0.00500.019 - 0.034 - 0.046 $5 \rightarrow 7$  $-2 \rightarrow 0$ 9.15 - 15.46 - 23.6116.81 - 91.14 - 97.660.0177 - 0.0384 - 0.04880.048 - 0.181 - 0.215 $0 \rightarrow 6$ 4.68 - 5.61 - 13.056.00 - 7.71 - 45.690.0096 - 0.0150 - 0.02760.011 - 0.017 - 0.061

Table 3  $RCR_{max}$  lookup table (median – 95th percentile – maximum) (based on 1000 shots, tonnage = 1 tonne/year, PNEC = 1  $\mu$ g/l)

Table 4 Key parameters of acrylaldehyde

Key parameter	Description/value	Lookup table information
Tonnage [tonne/year]	20 000-100 000	100 000
Release scenario	Chemical industry: used in syntheses	Production scenario
Biodegradability	Readily biodegradable	Readily biodegradable
Log(octanol/water partitioning)	-1.1	0–5
Log(vapour pressure [Pa])	4.5	0–6
Ecotoxicity (PNECaquatic [µg/l])	0.1	0.1

one, in order to check whether the lookup table is not overly conservative (and identifies a need for further assessment for essentially all chemicals). The availability of such database will also enable the determination of conservative and representative release fractions for each main category in order to further refine the lookup table.

#### 5. Conclusions

An easy-to-use, pragmatic and adequately conservative rule-based approach for the de-selection of substances of very low or no immediate environmental concern at an early stage was developed based on the principles and basic concepts from the EU Technical Guidance Document and EUSES. A simple lookup table gives environmental risk characterisation ratios (RCRs) for two groups of standardised chemical release scenarios, two biodegradability groups and two octanol-water partition coefficient and two vapour pressure groups. A simple transformation rule can then be used to calculate the RCR for specific tonnages and ecotoxicities (predicted no effect concentrations). The development of the rule-based screener and a preliminary validation, demonstrating its objectives, also indicated the need for an extensive and representative list of chemicals to further improve and validate the tool.

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Frederik Verdonck holds a PhD degree in Bio-engineering (environmental technology) obtained at Ghent University (Belgium) and is currently working at EURAS (EU Risk Assessment Services). His main expertise area comprises the implementation and application of statistical and modelling approaches in exposure, effects and risk assessment.

Geert Boeije, born in 1971, studied bio-engineering (focusing on environmental technology) at Ghent University, Belgium. In 1999, he got his PhD degree in Applied Biological Sciences at this University. Since then he has been active at Procter & Gamble's Fabric and Home Care business unit, initially as Environmental Toxicologist and currently as Product Safety and Regulatory Affairs manager.

Veronique Vandenberghe is a PhD student at the Faculty of Bioscience-engineering of the Ghent University, Belgium. The topic of her PhD thesis is "sensitivity and uncertainty analysis in river water quality modelling", the promotor is Prof. Vanrolleghem. She also focuses on design of monitoring networks for rivers. Further she is involved in the European CD4WC project, cost-effective development of urban waste water systems.

Mike Comber holds a PhD degree in Analytical Chemistry and Ecotoxicology, from the University of Plymouth. Dr. Comber's area of expertise is in understanding the environmental fate and effect of chemicals, through the appropriate use of data generated experimentally or through the application of models.

Watze de Wolf holds a PhD in environmental toxicology, and is a certified toxicologist. Via his work he gained significant experience in risk assessment of chemical substances. He currently heads the DuPont Europe programme on Health and Environmental Sciences, and is vice-president of Society of Toxicology and Chemistry (SETAC) a global organisation for environmental professionals.

Tom Feijtel studied at the University of Brussels and Gent where he obtained a Biology and Environmental Engineering degree. In 1986, he obtained a PhD in Biogeochemistry and Marine Sciences at Louisiana State University. He was associate professor from 1986 to 1989 at the Agricultural University of Wageningen (The Netherlands). In 1989, he joined Procter & Gamble. His current responsibilities include managing European policy and legislation on consumer & environmental protection, innovation and competitiveness and relationships with European NGOs. He is chairman of several working groups, task forces, technical or scientific committees; holds 2 patents, (co)authored more than 80 peer-reviewed journal articles, 4 reports and 2 books, and presented more than 100 platform and invited presentations at a variety of symposia and scientific meetings.

Volker Koch holds a PhD in Organic Chemistry obtained at the University of Stuttgart. His professional career started at Hoechst AG in Frankfurt (Germany) as manager Pesticide Development. He is currently working as Senior Expert for Environmental Risk Assessment and Regulatory Affairs at Clariant GmbH, Sulzbach (Germany). He was involved in a number of ECETOC and ERASM Task Forces and OECD Working Groups, the development of EU/OECD Substance Database IUCLID, the EU Technical Guidance Document for Risk Assessment and REACH Implementation Projects.

**Angela Siebel-Sauer** is a biologist, working at BASF's product safety as a product steward for ecological questions. Her main focus is ecological product evaluations including e.g. environmental classification and labelling and environmental risk assessment.

**Peter Vanrolleghem** is professor in model-based analysis and optimization of bioprocesses at Ghent University. He is bioengineer and has a PhD in environmental technology. Together with his BIOMATH research team he has published over 150 papers in international peer reviewed journals.