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1 Multi-laboratory validation of a new marine
2 biodegradation screening test for chemical
3 persistence assessment

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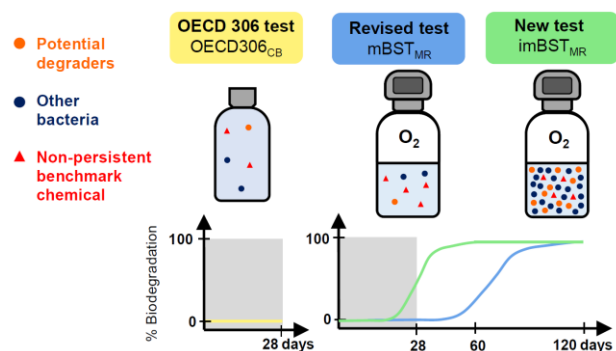
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36 ABSTRACT

37 Current biodegradation screening tests are not specifically designed for persistence assessment
38 of chemicals, often show high inter- and intra-test variability, and often give false negative
39 biodegradation results. Based on previous studies and recommendations, an international ring test
40 involving 13 laboratories validated a new test method for marine biodegradation with a focus on
41 improving the reliability of screening to determine the environmental degradation potential of
42 chemicals. The new method incorporated increased bacterial cell concentrations to better represent
43 the microbial diversity a chemical is likely to be exposed to in the sampled environments and ran
44 beyond 60 days, which is the half-life threshold for chemical persistence in the marine
45 environment. The new test provided a more reliable and less variable characterization of the
46 biodegradation behavior of five reference chemicals (sodium benzoate, triethanolamine, 4-
47 nitrophenol, anionic polyacrylamide, pentachlorophenol), with respect to REACH and OSPAR
48 persistence thresholds, than the current OECD 306 test. The proposed new method provides a cost
49 effective screening test for non-persistence that could streamline chemical regulation and reduce
50 the cost and animal welfare implications of further higher tier testing.

51 GRAPHICAL ABSTRACT



52

53 INTRODUCTION

54 Regulatory frameworks (REACH ¹, OSPAR ²) combined with standardised test guidelines
55 (OECD ³, ISO ⁴) help to protect the environment and human health from the risks and hazards
56 posed by globally manufactured chemicals. Within chemical risk assessment there has been a
57 philosophical shift towards prioritising chemicals based on the hazard of potential environmental
58 persistence, but regulatory tests have not reflected this change.⁵ Biodegradation screening tests
59 (BSTs) have not changed for over 30 years and are not effective at prioritising potential
60 environmental persistence; they are laboratory based short-term test whose duration is much less
61 than international half-life thresholds for persistence (60 days for seawater ⁶), they are variable ^{1,7-}
62 ⁹ and frequently report false negative outcomes.^{10,11} These outcomes can result in additional costly
63 biodegradation tests and potentially unnecessary bioaccumulation and toxicity tests of non-
64 persistent chemicals. It is estimated that effective persistence assessments may save upwards of
65 600 fish and \$75K per chemical reliably screened out earlier in the risk assessment process.¹²

66 BSTs' reliability can be increased by improving the representation of the environmental
67 microbial community in the test vessel through increasing microbial numbers and diversity in the
68 BSTs to more environmentally-relevant levels. It is hypothesised that this increases the likelihood
69 of including competent degraders in the test vessel; in comparison to previous tests that were
70 described as a "biodegradation lottery"; where small sample sizes can lead to variable test
71 outcomes.^{7,13-16} Intra-laboratory studies validated this concept for activated sludge and seawater
72 BSTs in a modified OECD 301B setup.^{7,17,18} Here, BSTs with more environmentally relevant cell
73 numbers improved the reliability and accuracy of identifying the relative biodegradation
74 classification of five radiolabeled benchmark chemicals. In addition, extended test durations
75 beyond 28 days resulted in a more reliable identification of non-persistent chemicals.

76 Following the findings from this research and a workshop on improvements to the marine BST
77 OECD 306 ¹⁶, an international ring test was performed to gather further scientific evidence towards
78 validating the impact of increased bacterial cell concentrations and prolonged test durations of a
79 new marine BST for chemical persistence assessment. The findings and recommendations of this
80 multi-laboratory study are presented here.

81

82 MATERIAL AND METHODS

83 Ring Test Organization.

84 The new marine BST was validated following the OECD guidance document 34 which
85 highlights fundamental aspects to consider when designing new test methods for regulatory
86 acceptance.¹⁹ The pre-validation^{7,17,18} and inter-laboratory ring test validation conformed to all
87 key factors recommended in chapter IV except that chemicals were not coded and sent blind to the
88 contract research organizations (CROs).¹⁹ Such coding was not used since only a restricted set of
89 reference chemicals were sent to each CRO, and to enable correct handling and use of the
90 chemicals in a way that conformed to health and safety policies.

91 For the ring test, the biodegradability of a group of reference chemicals was compared in three
92 different test setups (see below) at 13 CROs in Canada, Germany, Italy, Japan, Norway, UK and
93 USA (Supporting Information, Figure S1). The CROs (12/13 GLP accredited) conducted the
94 tests at their own expense under GLP, or GLP-like, conditions to a ring test design and protocols
95 developed by Newcastle University (NU) in collaboration with industry and regulatory bodies.
96 The ring test setups were as described below:

- 97 a. **OECD306CB:** Standard OECD 306 Closed Bottle Method with non-concentrated, aged
98 seawater over 28 days²⁰ as a benchmark, against which to compare the revised and new
99 test, plus one single measurement at day 60 to assess biodegradation potential and the
100 previously reported oxygen limitation in this test beyond 28 days²⁰
- 101 b. **mBST_{MR}:** Revised marine biodegradation screening test measuring biodegradation with
102 manometric respirometers (MRs) for 120 days with non-concentrated seawater to validate
103 use of MRs for marine BSTs and biodegradation potential beyond 60 days

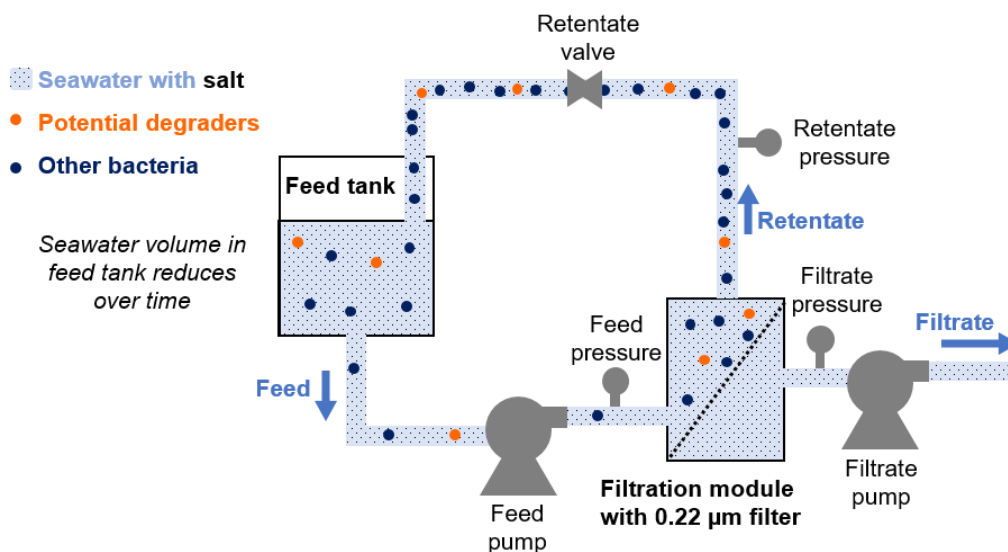
104 c. **imBST_{MR}**: A new (“improved”) marine biodegradation screening test measuring
105 biodegradation with MRs for 120 days with 100-fold nominally increased bacterial
106 concentrations in seawater to validate the effect of cell numbers and biodegradation
107 potential beyond 60 days¹⁸

108 **Sampling and Seawater Preparation.**

109 Seawater collection for all three tests followed the OECD 306 Closed Bottle Method protocol²⁰
110 with subsequent pretreatments varying according to the test. The OECD306_{CB} followed the
111 original protocol that allows filtration or sedimentation and ageing of the seawater to remove
112 coarse particles and reduce the content of dissolved organic material, respectively (Supplementary
113 Information, Table S1).²⁰ For both MR methods, raw seawater was pre-filtered through a 10- μ m
114 polypropylene filter bag (Cole-Parmer, Vernon Hills, USA), but not aged. Marine bacterial cell
115 numbers were increased 100-fold nominally by tangential flow filtration (TFF) for the new test
116 (imBST_{MR}) only. CROs were asked to measure pH, temperature (T), dissolved oxygen (DO),
117 conductivity, salinity and heterotrophic plate counts (HPC) in raw seawater (sample S1), post
118 10 μ m filtration (sample S2), post TFF bacteria concentration (sample S3) and post ageing (sample
119 S4) (Supplementary Information, Table S2). For CROs conducting the MR methods, NU took
120 samples to additionally measure total cell counts (TCC) in samples S1, S2 and S3. Additional
121 analysis included DNA sequencing for microbial community profiling from seawater samples
122 collected prior test setup (samples S1, S2 and S3) and post 120 day incubation, but this data is not
123 included here.

124 **Tangential Flow Filtration.**

125 Bacterial cell concentration was performed with a Pellicon 2 Mini TFF system (Merck,
126 Darmstadt, Germany), operated with five 0.1 m² surface 0.22 μm pore-size polyvinylidene
127 fluoride filters (Merck, Darmstadt, Germany), 3/8 in Tygon tubing (Merck, Darmstadt, Germany)
128 and two peristaltic pumps (Watson Marlow, Falmouth, UK) (Figure 1, Supplementary
129 Information, Figure S2).¹⁷



130
131 **Figure 1.** Schematic tangential flow filtration setup to increase bacterial cell numbers in seawater
132 (based on ²¹).

133 In TFF, water is pumped tangentially across the filter surface to reduce the chance of filter cake
134 formation. Seawater including salts passes the 0.22 μm filter membrane as a partial flow and is
135 removed as filtrate while bacteria remain in the retentate and are enriched in the feed tank. Using
136 relatively “open” membranes with a pore size of 0.22 μm , a filtrate pump reduces filtrate flow and
137 ensures a robust TFF process with reduced membrane wall concentrations and membrane
138 fouling.²¹

139 NU provided the CROs with the TFF equipment and a NU representative performed the
140 concentration and provided knowledge transfer of technical expertise to the host CRO. After the

141 first two test setups (CRO C and L), the permeate flow was reduced ($2.6 \text{ L min}^{-1} \text{ m}^{-2}$ to
142 $2.2 \text{ L min}^{-1} \text{ m}^{-2}$) at same feed flow ($6 \text{ L min}^{-1} \text{ m}^{-2}$) to operate the TFF more stably across
143 laboratories under varying seawater characteristics. Additionally, two recirculation steps with each
144 1 L of collected filtrate were included to flush any microorganisms sticking to the membrane in
145 the retentate. The filtrate was flushed through the system at maximum feed pump speed
146 ($6.7 \text{ L min}^{-1} \text{ m}^{-2}$ feed flow) and clamped filtrate tubing ($0 \text{ L min}^{-1} \text{ m}^{-2}$ permeate flow) for a cycle
147 of 2 min run, 1 min break and 2 min run.

148 The same TFF filters were used throughout the ring test. Prior to concentration, filters were
149 sanitized with 300 ppm sodium hypochlorite (NaOCl, pH 9, pH adjusted with 1 M hypochloric
150 acid) up to 30 min and permeability tested with the normalized water permeability (NWP) test to
151 assure filter cleanness and integrity. Following the manufacturers manual ²², NWP was calculated
152 recording feed, retentate and permeate pressure under a set flow rate with high quality water. The
153 initial NWP of the new membrane was used as the basis to determine membrane recovery, i.e. how
154 effectively the membrane was cleaned back to its original state. After concentration, filters were
155 cleaned with 300 ppm NaOCl, pH 9 for up to one hour and filter integrity was reassessed with the
156 NWP test, before storing the filters in a bacteriostatic solution of 0.1M H_3PO_4 , pH 2 at 4°C until
157 next usage.

158 **Flow Cytometry for TCC.**

159 TCC were measured by fluorescence staining of nucleic acids combined with quantitative flow
160 cytometry (FC) ^{23,24}, using a FACScan flow cytometer (Becton Dickinson, Franklin Lakes, USA)
161 with a 15 mW 488 nm air-cooled argon-ion laser. Seawater samples were collected and fixed in
162 absolute ethanol (1:1 v/v) at the CROs, transported at 4°C to NU within 3 days and then stored at
163 -20°C until use. Microbial cells in 1 mL of sample were stained with $10 \mu\text{L mL}^{-1}$ SYBR Green I

164 working solution (10,000 x concentrated SYBR Green I in DMSO, Sigma Aldrich, St. Louis, USA,
165 diluted 100 times in 10 mM Tris-HCL 1 mM EDTA, pH 8, Sigma Aldrich, St. Louis, USA) and
166 incubated in the dark at 38 °C for 13 min before measurement.²⁵ Where necessary, seawater
167 samples were diluted with filtered TE-buffer (0.22 µm; polyethersulfone membrane, Merck,
168 Darmstadt, Germany) before staining to achieve an event (defined as a single particle detected by
169 the instrument) rate between 200 and 800 bacteria/ s to avoid coincidence (i.e., two or more
170 bacteria being at the same time within the sensing zone).²⁶ Readings were collected in logarithmic
171 mode and analysed with Flowing Software 2.0, using electric gating to separate signals from
172 background.^{23,27}

173 **Test Chemicals.**

174 The following five test chemicals were selected to evaluate the limits of the tests (Supplementary
175 Information, Table S3 and S4): a positive (sodium benzoate: SB) and negative (pentachlorophenol:
176 PCP) reference chemical and three chemicals previously having shown variable degradation
177 (triethanolamine: TEA, 4-nitrophenol: 4NP and anionic polyacrylamide: APAM). Based on the
178 ECHA database and further literature (Supplementary Information, Table S4), chemicals were
179 assigned following reference persistence and biodegradation categories: non-persistent and rapidly
180 biodegradable (SB, TEA), non-persistent and inherently biodegradable (4-NP); or potentially
181 persistent (PCP). APAM was chosen as a representative chemical used in the marine environment.
182 As polymers are currently exempt from REACH regulation ²⁸, its biodegradability behaviour is
183 not classified in the ECHA database. Due to a lack of published reference biodegradation data for
184 APAM, it was not possible to assign an expected biodegradation classification for this test
185 chemical. Consequently, APAM results were reported separately to summaries of the SB, TEA,
186 4NP and PCP data.

187 **Test System Setup.**

188 The test setups were based on the capacity and ability of each CRO to perform either the
189 OECD306_{CB} or the MR methods, or both. In general, each CRO tested the positive and negative
190 reference chemical; for the three variable chemicals, 4NP and TEA were tested more often than
191 APAM, due to a greater volume of existing data for 4NP and TEA (Supporting Information, Table
192 S4-S5). CRO L also conducted a toxicity control for PCP as part of their imBST_{MR} setup (PCP +
193 SB).

194 OECD306_{CB} was prepared according to the original protocol, which uses natural seawater as the
195 sole source of microorganisms.²⁰ Briefly, sacrificial 300 mL biological oxygen demand (BOD)
196 bottles were filled with no headspace in triplicate for the oxygen blank and reference chemicals
197 (test concentration 2 mg L⁻¹) to measure biodegradation on day 0, 7, 14, 21, 28 and optional day
198 60 after incubation at 20°C in the dark.

199 An MR method, similar to OECD 301F²⁹, was selected for the revised (mBST_{MR}) and new test
200 (imBST_{MR}), using natural seawater for which increased microbial cells are used in the later. The
201 headspace in MRs provides more O₂, which is required for prolonged test durations and thus
202 renders ageing of seawater unnecessary to reduce background dissolved carbon content. At least
203 34-times more O₂ was available in MRs than in the OECD306_{CB} (Supplementary Information,
204 Table S6). Other advantages of MRs are that they require less seawater than sacrificial bottles,
205 continuous biodegradation curves can be monitored and that they are already accepted by
206 regulators.²⁹ However, it must be noted that MRs have a lower sensitivity compared to DO analysis
207 and require higher chemical test concentrations.²⁹ In the ring test, CROs used OxiTop Control/ IS
208 (WTW, Weilheim, Germany), CES (Coordinated Environmental Services, Kent, UK) and Micro-
209 Oxymax (Columbus Instruments, Columbus, USA) respirometers (Supplementary Information,

210 Table S1). Media were prepared following OECD 301F guidelines²⁹, with the only difference that
211 mineral and chemical stock solutions were diluted with filtered seawater (mBST_{MR}) or filtered,
212 100-fold concentrated seawater (imBST_{MR}) instead of water. The mineral medium was aerated
213 with clean compressed air for 20-60 min at 20 °C.²⁰ Triplicate MR units were filled with 250 mL
214 for the oxygen blank and reference chemicals (test concentration 75 mg ThOD_{NH3} L⁻¹) to measure
215 biodegradation continuously under stirred conditions over 120 days at 20°C in the dark. At the
216 first CRO (C), PCP was tested at its water solubility limit of 14 mg L⁻¹ (7.6 mg ThOD_{NH3} L⁻¹).
217 However, at subsequent setups, PCP was also added at 75 mg ThOD_{NH3} L⁻¹ to overcome MR
218 detection limits. OxiTop systems were backed up and reset at day 60 to allow data collection past
219 the system's memory capacity limit. Incubator temperatures were measured throughout the study
220 and media temperatures, dissolved oxygen and pH were also recorded in all MR units after test
221 termination.

222 **Biodegradation Determination and Interpretation.**

223 In all three tests, biodegradation of a chemical was measured indirectly as a function of O₂
224 consumption. While the OECD306_{CB} monitors DO in the liquid phase²⁰, MRs measure O₂
225 consumption either from the change in volume or pressure in the apparatus (OxiTop), or by
226 monitoring the quantity of O₂ produced electrolytically required to maintain constant gas volume
227 in the flask (CES), or by measuring the O₂ and CO₂ concentrations in the headspace via closed-
228 loop method (Micro-Oxymax). A solution of potassium hydroxide or another suitable absorbent
229 adsorbed the evolved CO₂ in the OxiTop and CES system.^{29,30} For all tests, biodegradation
230 calculation was based on theoretical oxygen demand (ThOD).²⁰ Briefly, net O₂ consumption was
231 calculated by subtracting the blank respiration from the O₂ depletion recorded in the test chemical
232 bottles. Percentage biodegradation was then determined by accounting for chemical test

233 concentration and $\text{ThOD}_{\text{NH}_3/\text{NO}_3}$ ($\text{ThOD}_{\text{NO}_3}$ for nitrogen containing TEA, 4NP, APAM). The
234 Micro-Oxymax MR measures O_2 consumption as well as CO_2 production. Consequently,
235 biodegradation was also calculated based on measured CO_2 with mineralization yield and ThCO_2 .

236 For the OECD306_{CB}, 7/9 CROs included a single measurement at day 60 to assess
237 biodegradation potential and previously reported O_2 limitation occurring in this test beyond 28
238 days.²⁰ Depending on the test setup and weekends, 4/7 CROs measured DO directly on day 60,
239 with the other three CROs conducting the measurement on day 62, 59 and 63. For the purpose of
240 comparing the tests with each other, all measurements were treated as if they took place on day
241 60. Following OECD 306 paragraph 4 and 15, blank BOD values on day 60 needed to be under
242 30% of that of the reference substances for the degradation measurements to be included in the
243 analysis.²⁰ For the MR methods, blank respiration was evaluated against the OECD 301F threshold
244 defined in paragraph 22 of 60 mg L^{-1} in 28 days.²⁹

245 Biodegradation outcome was assessed both on the marine REACH and OSPAR threshold for
246 persistence assessments. In REACH's integrated assessment and testing strategy (ITS), chemicals
247 are classified as non-persistent if they show $\geq 60\%$ biodegradation measured as ThOD over 60
248 days in an enhanced biodegradation screening tests.³¹ Biodegradation under 60% ThOD in 60 days
249 indicates potential persistence.³¹ OSPAR (§2.2, 57) considers a substance to be persistent if
250 "biodegradation is $< 20\%$ in OECD 306, Marine BODIS or any other accepted marine protocols
251 or $< 20\%$ in 28 days freshwater (ready test)".² Continuous biodegradation recording in MR systems
252 allowed the calculation of additional descriptors to assess the impact of increased bacterial cell
253 concentrations on degradation. For each test chemical in the mBST_{MR} and imBST_{MR} , time to reach
254 10% degradation i.e. lag time (t_L), time to reach 50% degradation (t_{50} , this descriptor is different
255 to the t_{50} descriptor mentioned in the OECD 306 that excludes the lag phase – see below) and dt_{50}

256 (t_{50-t_L} , this descriptor is equivalent to t_{50} as mentioned in OECD 306) were determined. The values
257 t_L , t_{50} and dt_{50} were only based on those replicates that showed degradation and excluded those
258 that did not degrade. The exclusion of such zero values therefore influences the observed variance,
259 median and mean values.

260 For biodegradation results to be valid, at least two out of three replicates needed to show
261 degradation. Biodegradation values over 120% were classified as outliers and excluded from the
262 analysis. Negative biodegradation values were set to zero to calculate the coefficient of variation
263 (CV) based on mean degradation and standard deviation from the triplicate test setups. Data
264 analyses and visualisation was performed using R.³²

265 The new test ($imBST_{MR}$) is based on the intra-laboratory validated marine environmentally
266 relevant BST ($erBST$).¹⁸ For a detailed description of test protocol modifications from the $erBST$
267 to the $imBST_{MR}$, see Supplementary Information, Methods M1.

268

269 RESULTS AND DISCUSSIONS

270 Seawater Pretreatment.

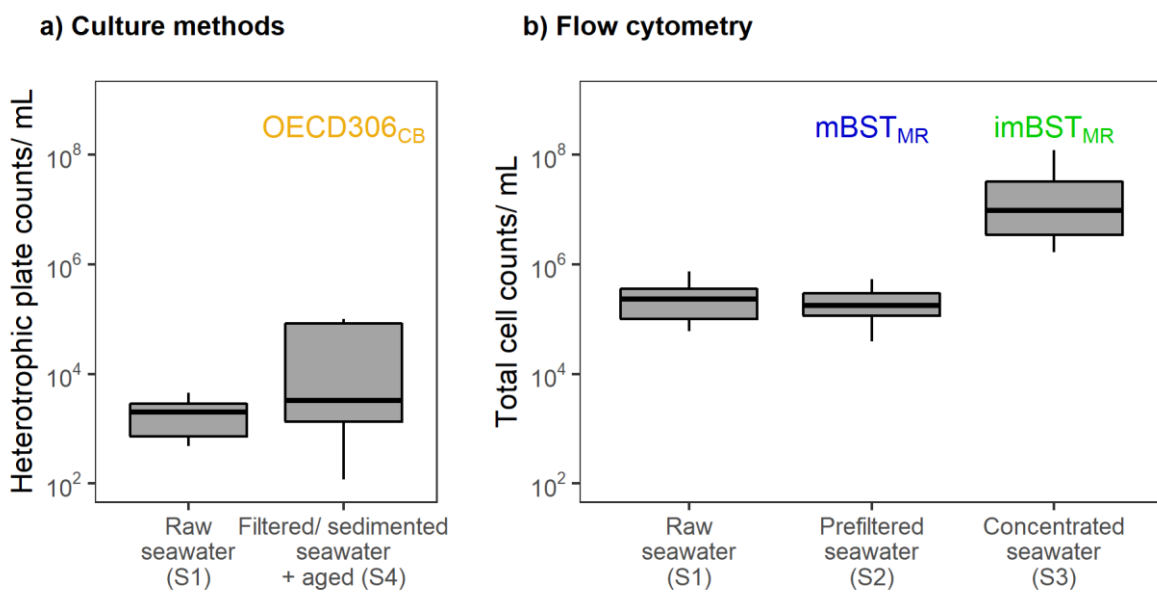
271 Following the OECD 306 guideline²⁰, seawater was collected from 0.5 - 60 m below the surface
272 and 40 - 5000 m offshore from March-August 2017 (Supplementary Information, Table S7)
273 depending on the CROs normal practices and sampling locations. For the OECD306_{CB}, CROs
274 followed their standard operating procedure (SOP) to pretreat seawater, providing an interesting
275 insight in test variation within the OECD 306. After 8/9 CROs removed coarse particles by
276 filtration or sedimentation, all CROs aged the seawater in the dark for 6-10 days with varying
277 aeration conditions at 18-21 °C (Supplementary Information, Table S1). With ageing not being
278 required, the MR tests were set up sooner after seawater collection (mean 2.8 ± 1.4 days, range
279 1 – 5 days) than the OECD306_{CB} tests (mean 8.2 ± 2.3 days, range 6 – 13 days).

280 7/9 CROs determined HPC for the OECD306_{CB}²⁰ (Supplementary Information, Table S2), with
281 NU measuring TCC at all MR test setups. Culture-dependent HPC only measures a small fraction
282 of TCC (0.01-1%³³), but a moderate positive correlation between both HPC and flow cytometry
283 methods (Supplementary Information Figure S3) allows comparison of the impact of ageing and
284 TFF on cell numbers in the OECD306_{CB} and imBST_{MR}, respectively. It should be noted that
285 different CROs used different media and methods for HPC culturing (Supplementary Information,
286 Table S2), which can affect the number and types of microorganisms recovered.³⁴ Therefore,
287 greater value can be placed on concentration changes within one CRO, rather than comparisons
288 across laboratories. The variation of bacterial concentrations in raw seawater collected from
289 different sites varied by an order of magnitude for both enumeration methods (HPC and TCC),
290 even if HPC on average only accounted for 7% of the TCC (Figure 2).

291 Ageing with preceding filtration/ sedimentation had a variable impact on bacterial numbers
292 (Figure 2). Depending on the CRO, OECD 306 pretreatment increased (up to 142-fold) or reduced
293 (80% lower) cell concentrations from raw seawater (based on HPC from raw (sample S1) to
294 filtered/ sedimented and aged seawater (sample S4), Supplementary Information, Table S8). This
295 variable change in cell numbers is not solely explained by the variation in pretreatment methods,
296 but probably also depends on the initial microbial composition of the seawater. Ageing has
297 previously shown to impose a selective pressure on the microbial community and change its
298 composition from the sampled environment.³⁵ When the test chemical is then added, the bacterial
299 community may have become atypical of the environment. This may lead to a higher or lower
300 biodegradation potential to be observed and consequently increases the uncertainty and inaccuracy
301 of extrapolating laboratory biodegradation data to the environment.³⁵

302 Based on TCC, raw and 10 µm filtered seawater across CROs conducting the new (imBST_{MR})
303 and revised (mBST_{MR}) tests contained on average 10⁵ bacterial cells mL⁻¹ (ranging from 10⁴ to 10⁵
304 bacterial cells mL⁻¹) with increased average bacteria concentrations after TFF processing of
305 10⁷ bacterial cells mL⁻¹ (ranging from 10⁶ to 10⁸ bacterial cells mL⁻¹). TFF increased the
306 concentration of bacteria at all CROs on average 107-fold, ranging from a 14-fold to 222-fold
307 increase (based on TCC from 10 µm filtered (sample S2) to concentrated (sample S3) seawater,
308 Supplementary Information Table S8). Due to time and logistical constraints, TFF was optimized
309 at NU and those conditions applied at each CRO. The process could be improved towards
310 achieving the intended 100-fold increase at all locations through optimizing the flow rates for each
311 seawater source. As expected, TFF did not increase salinity (Supplementary Information Table
312 S7). Martin *et al.* (2018) previously showed that TFF does not significantly change the relative
313 microbial community composition, with concentrated marine bacteria communities being a good

314 representation of the sampled environments.¹⁷ A chemical in the sea encounters a vast amount of
 315 microbes in a short amount of time with cell concentrations in the range of 10^{10} - 10^{11} TCC m^{-3} (as
 316 determined here), seawater turnover times in the order of 10^5 - 10^6 $m^3 s^{-1}$ ³⁶ and typical velocities in
 317 coastal oceans of 0.1 - 1 $m s^{-1}$.³⁷ For the imBST_{MR}, the test chemical is therefore introduced to a
 318 more environmentally relevant wider microbial community by increasing the bacterial numbers
 319 used in the test.



320

321 **Figure 2.** Boxplot showing the effect of pretreatment on bacterial concentrations for all three test
 322 setups. (a) Heterotrophic plate counts (determined by different culture methods) for OECD306_{CB}
 323 setups. (a) Total cell concentrations (determined by flow cytometry) for mBST_{MR} and imBST_{MR}
 324 setups.

325 **Chemical Classification.**

326 The new test (imBST_{MR}) was more accurate and less variable than the comparator-screening
 327 tests, the mBST_{MR} or OECD306_{CB} (Table 1, Supplementary Information, Figures S4-13, Tables

328 S9-16). According to the REACH biodegradability criterion in marine water, the imBST_{MR}
329 correctly classified 70% of the reference chemicals to their respective persistence category (non-
330 persistent or potentially persistent) and had a coefficient of variation of 30% between tests. In
331 contrast, the OECD306_{CB} only correctly classified 48% of the test chemicals and had a coefficient
332 of variation of 48%. Thus, the new test method has a much lower rate of false negatives according
333 to the REACH criterion compared to the current test method; 41% and 62%, respectively (Table
334 1). Within the non-persistent chemicals, SB degraded in almost all replicates with more variable
335 biodegradation results for TEA and 4NP (Supplementary Information, Table S15). While the new
336 test increased the correct classification of SB, TEA and 4NP as non-persistent ($55\% \pm 43\%$ based
337 on replicates) in comparison to the revised ($36\% \pm 55\%$) and current OECD 306 test ($37\% \pm 55\%$),
338 it shows that some non-persistent chemicals are still going to fail this new test. For instance, 4NP
339 degraded in 11% of the replicates in the new test according to the REACH criterion, but in no
340 replicates in the revised or OECD 306 test (Supplementary Information, Table S15). While 4NP
341 has been observed to fully degrade in activated sludge BSTs⁷, its biodegradation in marine BSTs
342 has been found to be more variable.^{9,18} This appears to be related to previous exposure to 4NP
343 where rapid biodegradation is observed with pre-adapted inocula.⁹
344 The variability in biodegradation results differed across CROs, test chemicals and test setups with
345 the lowest coefficient of variation value for SB in the OECD 306 test (5%) and the highest
346 coefficient of variation value for 4NP, also in the OECD 306 test (75%) (Supplementary
347 Information, Table S16).

348 Some erratic degradation behavior was observed in all three test setups for the negative control
349 (Supplementary Information, Figures S12-13). For the mBST_{MR} and imBST_{MR}, these anomalous
350 replicates may relate to solubility and toxicity issues associated with PCP at the test concentrations

351 employed to overcome MR detection limits. The toxicity control performed at one CRO showed
352 an inhibitory effect of PCP at the concentration employed in the MR tests (139 mg L⁻¹)
353 (Supplementary Information, Figure S14). PCP was the best possible choice out of over 30
354 chemicals investigated to find a negative reference chemical^{38,39}, but a measure of caution should
355 be taken when interpreting these biodegradation results. Neither, the new (imBST_{MR}) or revised
356 (mBST_{MR}) test showed any false positives under the criteria chosen for evaluation. This is
357 consistent with the intra-laboratory validation, where radiolabeled PCP was employed at test
358 concentrations below the solubility and toxicity threshold at 10 mg L⁻¹.¹⁸

359 False positives (33%) were only reported for the OECD306_{CB} method across CROs when using
360 the OSPAR persistence criterion, though based on some unusual biodegradation curves, since
361 often the value was a spike in all replicates at a single time point (Table 1, Supplementary
362 Information, Figure S13). It is unclear if this was due to the low test concentration of PCP applied,
363 the general increased variability of the OECD306_{CB}, and/or that the OSPAR criterion for
364 persistence is different than that used by REACH.

365 For all three tests, the REACH non-persistence criterion, with its higher biodegradation
366 threshold of 60% over 60 days, appeared to characterize the reference chemicals more accurately
367 and reliably than the OSPAR persistence criterion of <20% over 28 days (Table 1). Assessing the
368 biodegradation data based on the REACH threshold resulted not only in no false positives, but also
369 reduced false negative rates across all three tests in comparison to the OSPAR criterion (Table 1).
370 It is also worthwhile noting that within REACH a “result of >20% ThOD or DOC removal is
371 indicative of a potential for primary biodegradation in the marine environment”.¹

372 **Table 1.** Correct persistence assessment, false negatives and false positives in the three test setups
 373 across CROs as evaluated against two current regulatory thresholds for the reference chemicals
 374 according to their expected classification (Supplementary Information, Table S4). Test variation
 375 across three tests is described by the coefficient of variation (CV) including and excluding the
 376 negative control (for CVs per chemical, see Supplementary Information, Table S16).

	According to:	Current test OECD306 _{CB}	Revised test mBST _{MR}	New test imBST _{MR}
Correct persistence assessment: SB, TEA, 4NP are non-persistent and PCP is potentially persistent	OSPAR ^a	42%	55%	63%
	REACH ^b	48% ^c	59%	70%
False negatives: incorrect assessment of SB, TEA, 4NP as potentially persistent	OSPAR ^a	63%	62%	50%
	REACH ^b	62% ^c	57%	41%
False positives: incorrect assessment of PCP as non-persistent	OSPAR ^a	33%	0%	0%
	REACH ^b	0% ^c	0%	0%
Coefficient of variation including negative control		49%	42%	35%
Coefficient of variation excluding negative control		48%	47%	30%

377 ^a OSPAR: Biodegradation $\geq 20\%$ over 28 days = non-persistent; biodegradation $< 20\%$ over 28 days = persistent ²

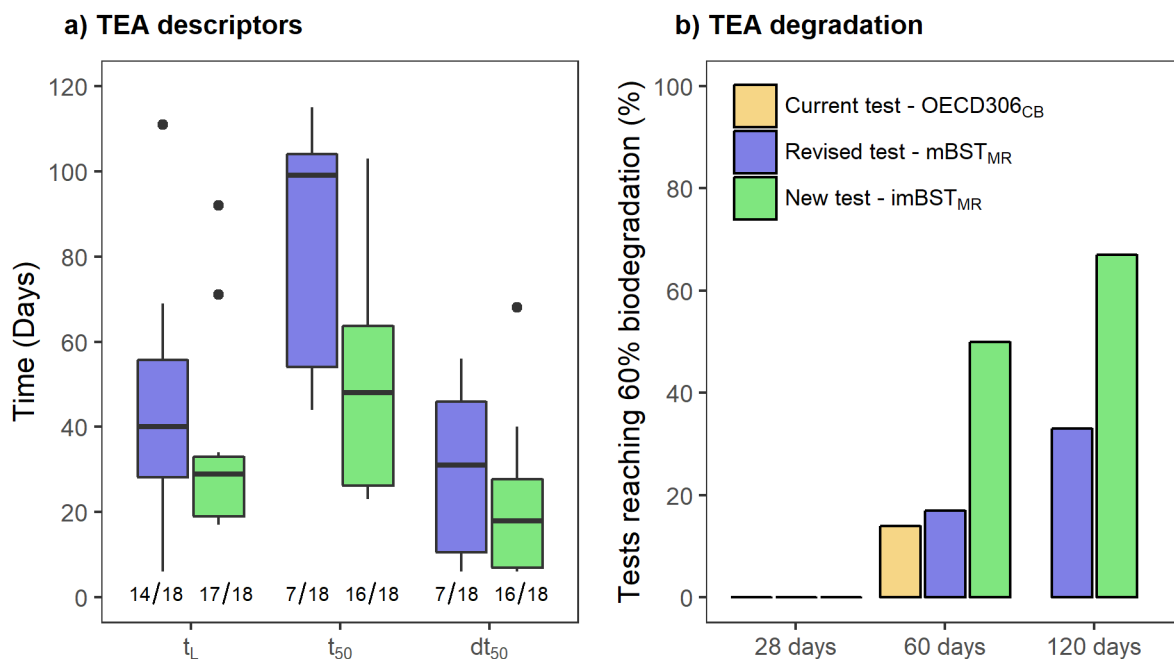
378 ^b REACH: Biodegradation $\geq 60\%$ over 60 days = non-persistent; biodegradation $< 60\%$ over 60 days = potentially
 379 persistent ³¹

380 ^c Test extended to 60 days in accordance with OECD 306 Closed Bottle Method § 4 and 15 ²⁰

381

382 The synthetic polymer APAM was tested as polyacrylamides (PAMs) are highly relevant to the
 383 marine environment. PAMs are widely used in several industrial fields such as for water treatment,
 384 agriculture and oil recovery.⁴⁰ As its biodegradability behavior is not classified in the ECHA
 385 database, and peer-reviewed scientific reference data is lacking, reference values for the
 386 comparison in Table 1 are not available and its degradation results are mentioned separately. For
 387 the revised and new test, APAM did not show any degradation under the OSPAR and REACH
 388 criteria. However, APAM was classified as non-persistent in 25% of CROs in the OECD306_{CB}
 389 according to the OSPAR persistence criterion, but not according to the REACH biodegradability

390 criterion (Supplementary Information, Figure S11, Table S9). These results should be evaluated
391 carefully considering the false positive PCP characterizations under the same assessment
392 conditions (OECD306_{CB} and OSPAR criterion). Additionally, APAM previously showed no
393 degradation in BSTs and studies found PAM macromolecules resistant to microbial attack,
394 requiring an initial physical-chemical break-down.^{41,42}



395
396 **Figure 3.** Example plots for triethanolamine (TEA). a) Increased cell numbers in the new test
397 reduce t_L (time to 10% degradation), t_{50} (time to 50% degradation) and dt_{50} ($t_{50} - t_L$). Boxplot based
398 on mBST_{MR} and imBST_{MR} replicates where descriptor values could be determined (indicated by
399 values under each boxplot) within the 120 day test period. In Figure S15, t_L , t_{50} and dt_{50} were set
400 to 121 days for non-degrading mBST_{MR} and imBST_{MR} replicates. b) Correct non-persistence
401 assessment increases with longer test durations.

402 Extended test durations in the mBST_{MR} and imBST_{MR} allowed the analysis of lag phases, which
403 extended beyond the standard 28-day test duration. These lag phases, particularly for TEA and

404 4NP, were often followed by fast and complete degradation of the test chemical (Figure 3a,
405 Supplementary Information, Figure S15) indicating the presence of an acclimated viable degrading
406 community. Acclimation is a common but poorly understood phenomenon that requires further
407 investigation in the context of regulatory biodegradation testing.⁴³⁻⁴⁵ In general, increased cell
408 numbers in the new test resulted in shorter and more consistent lag periods (Supplementary
409 Information, Tables S10-S13).

410 The probability of observing degradation increased with time so that for those chemicals that
411 have previously shown variable biodegradation results, 4NP and TEA, the 120-day duration gave
412 a more reliable characterization of the persistence category for a given chemical than the 60 and
413 28-day duration test (Figure 3b, Supplementary Information, Tables S11-S12). There was a
414 positive relationship between TCC and biodegradation potential (Pearson correlation, P(4NP) and
415 TCC 0.83, P(TEA) and TCC: 0.65 with $p < 0.01$). However, the greatest rates and extents of
416 degradation were not necessarily observed at the CROs with the highest cell concentrations,
417 suggesting that cell concentration is not the only factor influencing the degradation potential of an
418 environmental sample. Indeed further research is needed to investigate how microbial diversities
419 at different sampling locations affect biodegradation test outcome. Microbial community analysis
420 of seawater samples collected prior test setup and post 120 day incubation in the ring test will be
421 subject of a separate publication.

422 **Test system performance, anomalies, caveats and data quality checks.**

423 For the OECD306_{CB}, seawater ageing allowed the test to run past 28 days without oxygen
424 limitation occurring (blank BOD under 30%²⁰; Supplementary Information, Figure S16). It should
425 be noted that these results are not based on a time series but on only one sacrificial triplicate
426 measurement past 28 days at day 60. Blank readings for the mBST_{MR} and imBST_{MR} were within

427 the 60 mg L⁻¹ 28 days threshold defined in OECD 301F (Supplementary Information, Figure S17).
428 ²⁹ In closed system MRs, blank respiration remained under 60 mg L⁻¹ over 120 days for all CROs
429 except for CRO A in the imBST_{MR} setup. Interestingly, higher blank oxygen consumptions were
430 recorded for the oxygen replenishing MRs (CRO K and M) than in for the closed system MRs.

431 Incubator temperatures for all tests were within 20 ± 2°C.²⁰ However, at 7/9 CROs, temperature
432 increases over 22 °C were detected in MR bottle contents after 120 days, probably caused by
433 residual heat from the stirring motion in the MRs or from the stirring platforms on which they sit
434 (Supplementary Information, Figure S18). The water bath operated CES respirometer showed the
435 lowest temperature increase (mean 20.1 ± 0.2 °C). The use of water baths instead of incubators,
436 reducing stirrer speed, or incubation temperatures may help to mitigate such variation.

437 Out of 528 sacrificial OECD306_{CB} bottles, 18 bottles were excluded from the analysis at
438 CRO F with biodegradation values >120% and systematic anomalous results in all batches on day
439 7 (Supplementary Information, Figure S19). Out of 205 started MR units (mBST_{MR} 100, imBST_{MR}
440 105), eleven units were not included in the analysis (Supplementary Information, Figure S19). At
441 CRO I, two OxiTop units stopped working as batteries ran out of power within the first week. At
442 the first CRO C, all PCP units were excluded as the chemical was added at concentrations under
443 the detection limit. Three units in oxygen replenishing MR systems were excluded with
444 biodegradation values over 120% (Supplementary Information, Figure S20). To reliably assess the
445 mBST_{MR} and imBST_{MR} in the Micro-Oxymax at CRO M, the more robust CO₂ production data
446 instead of O₂ consumption biodegradation data was included in the analysis (Supplementary
447 Information, Figure S21). MRs proved suitable for monitoring biodegradation in seawater, but
448 reliability varied depending on the system used. In general, biodegradation values over 120% in
449 all three tests may have been caused by bottle contamination or calibration errors and negative

450 biodegradation values by test chemical inhibition or disproportionately high blank respiration (e.g.
451 contamination with organic debris/ protozoa).

452 **Practical aspects of tangential flow filtration.**

453 Concentration of bacterial cells in the ring test was performed with the previously tested and
454 optimized Pellicon 2 Mini TFF system (Merck, Darmstadt, Germany) ¹⁷, but other filtration
455 systems could also be employed for the new test as long as they do not alter the microbial
456 composition of the raw seawater. TFF costs vary depending on the required sample throughput
457 and manufacturer. The compact TFF setup as employed for the ring test costs around \$15K
458 (including holder, tubing, fitting kit, pressure gauges, filters) with additional costs of
459 approximately \$6K for the two peristaltic pumps. The time to increase bacterial cell concentrations
460 by a nominal 100-fold in seawater using TFF depends on following aspects: seawater volume to
461 filter (defined by test setup e.g. number of test chemicals, replicates and test volume), filter surface
462 and seawater characteristics (e.g. pollution status, particle content). For instance, performing the
463 new test (imBST_{MR}) with triplicate blank, positive control and test chemical would require
464 bacterial cells present in 300 L to be concentrated to 3 L. Filtering this water would take 5 h with
465 the compact “travel-friendly” ring test TFF setup (filter surface 0.5 m², conservative permeate flow
466 2.2 L min⁻¹ m⁻²), but only 20 min with a bigger system at same permeate flow (e.g. Pellicon
467 Cassette Acrylic Holder, filter surface 5 m²). For less viscous (clearer) seawater, permeate flow
468 can be increased to further reduce filtration time while maintaining conditions of minimal fouling
469 and operating a steady process.

470 **Regulatory Implications.**

471 The purpose of regulatory BSTs is to screen out those chemicals that degrade rapidly from those
472 that are potentially persistent. This ring test demonstrated that the new test (imBST_{MR}) provides a
473 more robust prioritization on potential persistence than the current OECD 306, improving the
474 reliability of BSTs by increasing bacterial cell numbers and extending test durations (Table 2), as
475 suggested by previous studies.^{7,13-15,18} This new test would provide more robust data and increase
476 confidence in biodegradation conclusions.

477 The findings of the ring test together with other research^{7,17,18} demonstrate that increasing
478 bacterial concentrations is a suitable modification to improve persistence assessment for
479 “enhanced screening tests”, despite its recent exclusion as an accepted approach in the REACH
480 endpoint specific guidance.^{1,18,46} While the new test better represents the microbiome of the
481 sampled environment by capturing 100-fold more bacteria in the test vessel¹⁷, it is still a
482 conservative screening test, being based on growth-linked biodegradation using unrealistically
483 high test chemical concentrations to overcome analytical constraints. In the ring test, standard
484 OECD 306 seawater pretreatment had a variable effect on bacterial concentrations, sometimes
485 increasing them by two orders of magnitude. This increase is comparable to cell concentrations in
486 the imBST_{MR}. However, in contrast to TFF¹⁷, the incubation conditions during ageing have been
487 documented to apply an unnatural selection pressure and alter the microbial community
488 composition from that in the original seawater sample.⁴⁷ The ratio of bacterial cells to test chemical
489 in the standard OECD 306 method were comparable to the new test given the one to two orders of
490 magnitude higher test chemical concentrations employed in the latter and the variable bacterial
491 cell concentration effects of ageing in the former. Previous studies have also shown that kinetics
492 in BSTs with increased bacterial cell concentrations can be indistinguishable from those in current
493 BSTs.⁷ In general, it should be highlighted that bacteria to test chemical ratios can vary greatly in

494 existing OECD BSTs with cell concentrations varying by five orders of magnitude and chemical
 495 concentrations varying by two orders of magnitude.^{20,29}

496 **Table 2.** Advantages and disadvantages of using the new test (imBST_{MR}) to screen for non-
 497 persistent chemicals in seawater (in comparison to the OECD306_{CB}).

Advantages	Disadvantages
<ul style="list-style-type: none"> • Increased reliability: New test is more reliable and less variable in screening for non-persistent or potentially persistent chemicals than OECD 306_{CB} method (based on tested reference chemicals); effective persistence assessment saves costs and reduces potentially unnecessary animal testing¹²; • Regulatory acceptance: MRs are already accepted by regulators to monitor biodegradation for the OECD 301F²⁹; some CROs already have MRs available and are familiar with their use; • Extended test durations: Headspace (and oxygen replenishing mechanisms) in MRs reduce oxygen limitation, render seawater ageing unnecessary and allow to extend test durations beyond 28 days; • Reduced maintenance: Once MRs are setup, biodegradation measurements can be recorded continuously and automatically; • Increased environmental relevance: While both, ageing (OECD306_{CB}) and TFF (new test) increased cell concentrations up to two orders of magnitude in the ring test, TFF has been shown previously to not alter the microbial community significantly¹⁷, in comparison to ageing;⁴⁷ 	<ul style="list-style-type: none"> • Higher test chemical concentrations: MRs are less sensitive than dissolved oxygen measurements in OECD306_{CB};^a • More seawater required: CROs have to collect 100-fold more seawater for the cell concentration step (note however, that less seawater is required to run non-destructive MR units than sacrificial OECD306_{CB} bottles);^b • Investment: CROs need to invest in a filtration system (and potentially MR units) and familiarize themselves with the equipment;^b • Testing poorly soluble and/or volatile chemicals: To expand on the scope of chemicals tested in the new test, modifications for poorly soluble chemicals as described in OECD 301 Annex III and by other methods^{48,49} might be necessary; some MR systems with plastic components might not be suitable to test volatile hydrocarbons due to abiotic losses⁵⁰;

498 ^a Radiolabeling could allow testing at lower test chemical concentrations; ^b Seawater

499 concentration could be performed at specialized facilities located near to the sea

500 To avoid the cost and animal welfare implications of additional potentially unnecessary testing,
501 it is crucial to reduce the variability, and thus number of false negatives in current first tier BSTs.⁷
502 Within the integrated testing strategy for persistence assessment, the new test (imBST_{MR}) could sit
503 at a tier lower than the more complex, costly and time-consuming simulation tests (OECD 307,
504 308 and 309³¹).

505 Better guidance is required on interpreting prolonged lag phases followed by quick degradation
506 observed in the ring test and other marine studies.^{18,51,52} It should be investigated whether these
507 long lag phases are likely to occur during the degradation of chemicals in the sea or whether they
508 are artefacts of the stringent but less environmentally relevant physico-chemical conditions in
509 BSTs. In the absence of such comparisons, the new test offers a practical and economical means
510 to improve the screening of chemicals likely to end up in the marine environment as part of the
511 current persistence assessment testing strategy.

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521 **Author Contributions**

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526 R.J.D. wrote the paper with critical feedback from all co-authors. All authors have given approval
527 to the final version of the manuscript.

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534 **Notes**

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547 **ABBREVIATIONS**

548	4NP	4-nitrophenol
549	APAM	anionic polyacrylamide
550	BOD	biological oxygen demand
551	BST	biodegradation screening test
552	CRO	contract research organization
553	CV	coefficient of variation
554	DO	dissolved oxygen
555	dt ₅₀	= t ₅₀ -t _L
556	FC	flow cytometry
557	HPC	heterotrophic plate counts
558	ITS	integrated assessment and testing strategy
559	imBST _{MR} :	new “improved” marine biodegradation screening test measuring biodegradation
560		with manometric respirometers
561	mBST _{MR} :	marine biodegradation screening test measuring biodegradation with manometric
562		respirometers
563	MR	manometric respirometer
564	NaOCl	sodium hypochlorite
565	NU	Newcastle University
566	NWP	normalized water permeability
567	OECD306 _{CB} :	OECD 306 Closed Bottle Method
568	PAM	polyacrylamide
569	PCP	pentachlorophenol
570	SB	sodium benzoate
571	SOP	standard operating procedure
572	t ₅₀	time to reach 50% degradation
573	T	temperature
574	TCC	total cell counts

575	TEA	triethanolamine
576	TFF	tangential flow filtration
577	ThOD	theoretical oxygen demand
578	t_L	lag phase; time to reach 10% degradation

579
580 **Supporting Information.**

581 This information is available free of charge via the Internet at <http://pubs.acs.org>. Test protocol
582 modifications in the imBST_{MR} from the pre-validated marine erBST. Location map of CROs
583 participating in the ring test. Photos of example TFF setup. Graph of HPC and TCC correlation in
584 seawater samples. Biodegradation plots and overview of chemical degradation data. Blank oxygen
585 uptake plots. Boxplots of temperatures measured in MR batches. Summary tables for water
586 analysis methods and measurements. Details on reference chemical properties, selection and
587 testing strategy. Calculations of available oxygen in different test setups. Table of pretreatment
588 effects on bacteria concentrations.

589

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1 Multi-laboratory validation of a new marine
2 biodegradation screening test for chemical
3 persistence assessment

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43

44 **SUPPORTING INFORMATION**

45 Pages: 38

46 Figures: 21

47 Tables: 16

48 **Methods M1: Test protocol modifications in the imBST_{MR} from the pre-validated marine**
49 **erBST.**

50 The new test (imBST_{MR}) was based on a previous intra-laboratory validated marine
51 environmentally relevant BST (erBST) ¹, but differed in following aspects to incorporate
52 recommendations from stakeholders and other studies:¹⁻³

- 53 • Terminology: While the microbiome in the erBST and imBST_{MR} aims to better represent
54 the samples environment, other BST conditions still do not represent the environment
55 well e.g. high test chemical concentrations and high incubation temperatures.
56 Consequently, the terminology “environmentally relevant” was replaced with
57 improved/new for the imBST_{MR}.
- 58 • Biodegradation measurement: To overcome potential biodegradation underestimations
59 in OECD 301B tests ^{1,4-6}, the imBST_{MR} monitored biodegradation with MRs in a
60 modified OECD 301F test.
- 61 • TFF: In the imBST_{MR}, the TFF protocol was optimized to incorporate an additional
62 filtrate pump to reduce membrane wall pressures. No backflushing was performed to
63 preserve membrane integrity.
- 64 • Test chemicals: Due to equipment and licensing limitations at CROs, test chemicals were
65 not radiolabeled (¹⁴C) in the ring test. Higher test chemical concentrations were
66 employed in the new and revised MR test in comparison to the pre-validation study.¹ In
67 MR tests, chemical stock solutions were prepared with seawater instead of OECD
68 mineral medium to circumvent seawater dilution in the test vessel (of bacterial cell
69 concentrations and salinity).¹ However, it should be noted that the high salt

70 concentrations in seawater can modify the solubility and related properties of some
71 organic chemicals.⁷

72 • Test medium: Phosphate nutrient additions (OECD mineral medium solution a) in the
73 MR tests followed the OECD 301F protocol ⁸ and were 10 × higher than in the pre-
74 validation study which followed the OECD 306 recipe.^{1,9} The OECD guidelines do not
75 explain this difference, but the OECD 306 method probably requires less phosphate due
76 to the natural buffering capacity of seawater ¹⁰ and lower test chemical concentrations
77 employed. To account for increased test chemical levels, more phosphate was added in
78 the MR tests. However, it should be noted that this alteration was expected to have little
79 or no effect as phosphate is added to excess in all OECD BSTs and no adverse effects
80 have been observed with increased phosphate levels in BSTs.^{10,11}

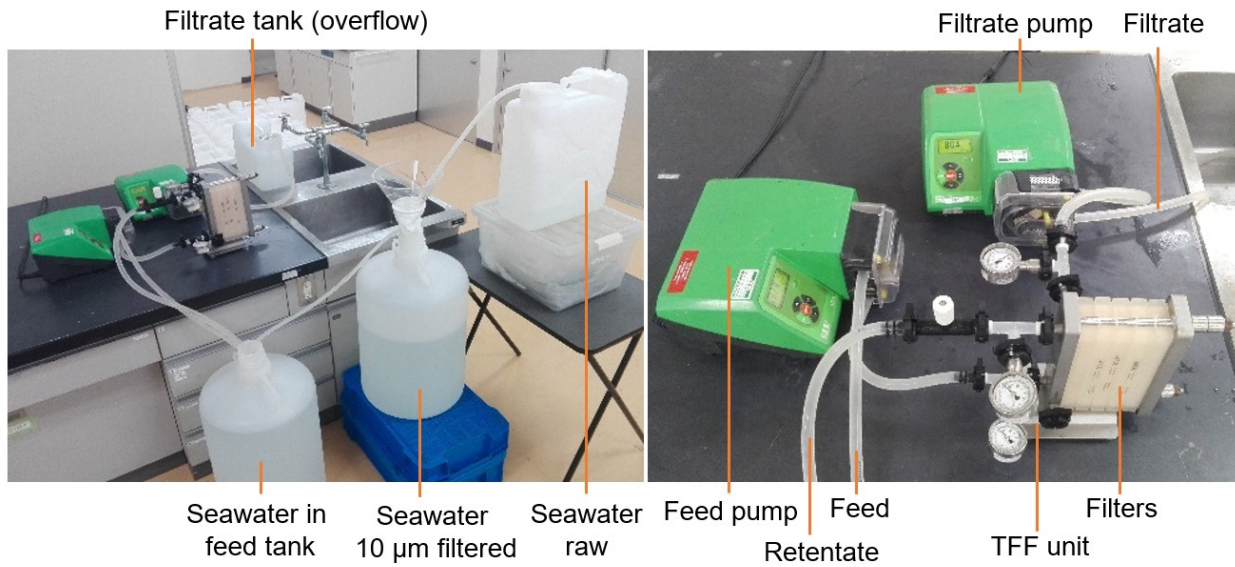
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83 **Figure S1.** Locations of laboratories participating in the ring test.

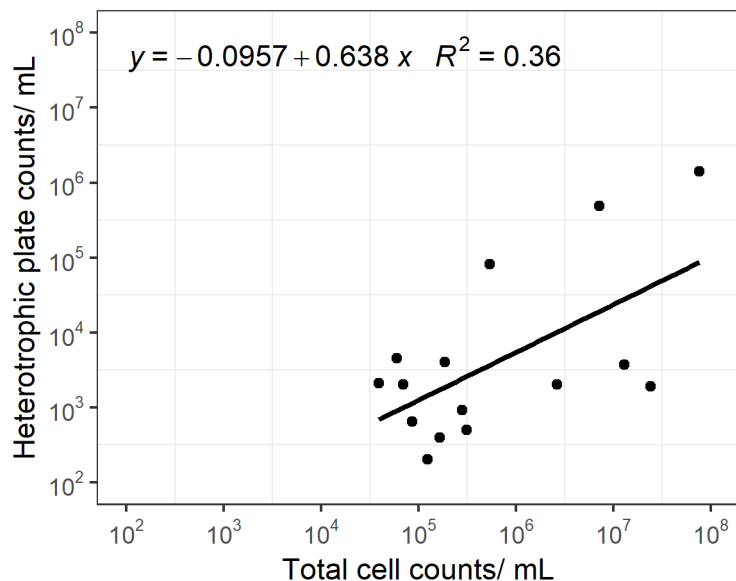
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86 **Figure S2.** Example tangential flow filtration setup to increase bacterial cell numbers in seawater.

87



88

89 **Figure S3.** Correlation and linear regression between heterotrophic plate counts (measured using different
 90 culture methods) and total cell concentrations (measured by flow cytometry) in seawater samples (S1, S2,
 91 S3) where both measurement methods were conducted.

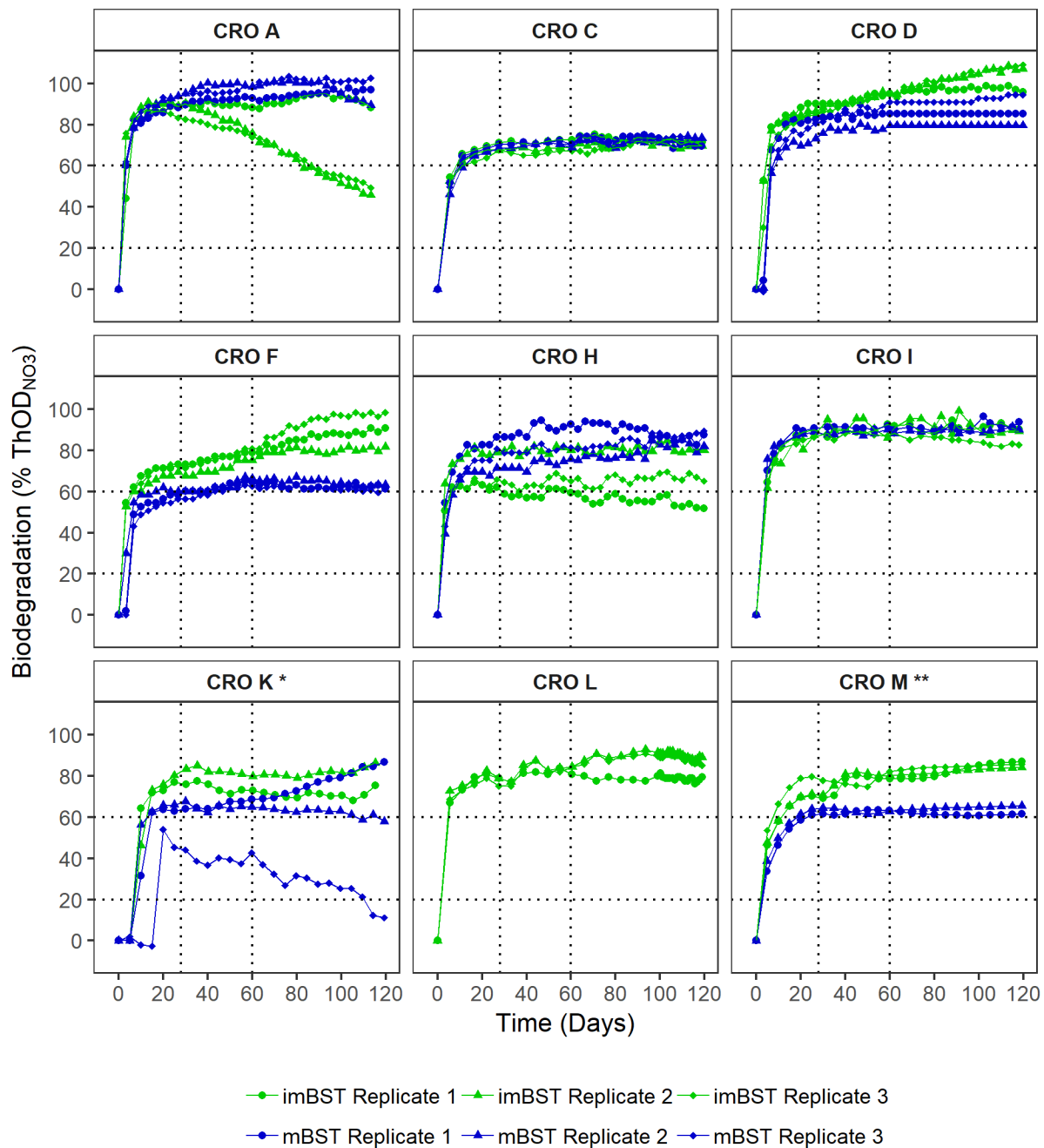
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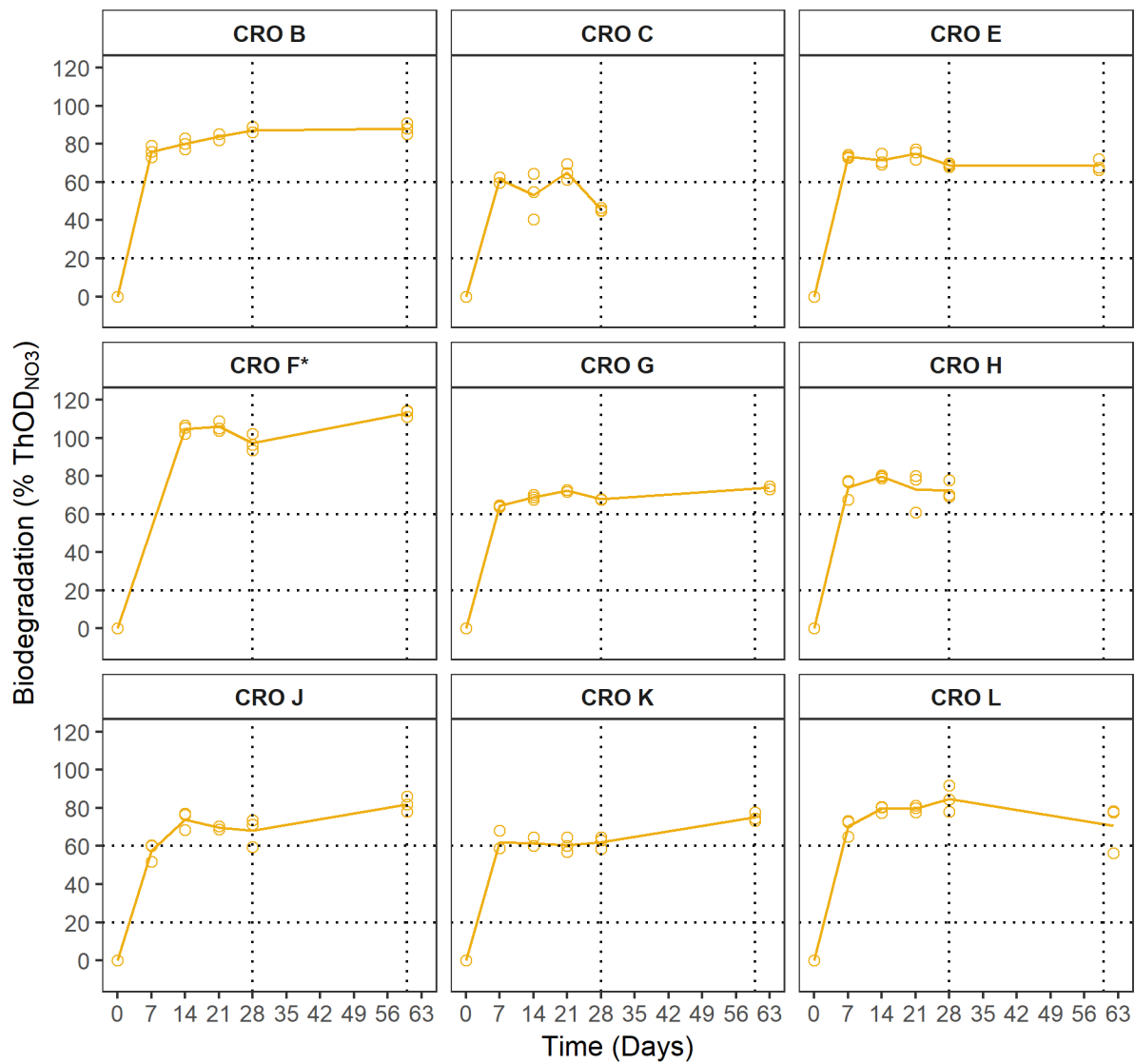
96 **Note:** For the following imBST_{MR} and mBST_{MR} biodegradation plots, every 20th data point was plotted for
 97 CRO A, C, D, F, H, K, L, M (automatic recordings every 4- 7 hours) and every 3rd data point for CRO I
 98 (manual daily recordings on weekdays). For the OECD306_{CB} biodegradation plots, individual
 99 measurements of the sacrificial BOD bottles are plotted together with a line representing the arithmetic
 100 mean.



101

102 **Figure S4.** Biodegradation of sodium benzoate in the mBST_{MR} and imBST_{MR}. * For removed outlier, see
 103 Figure S20. ** Biodegradation based on CO₂ production instead of O₂ consumption.

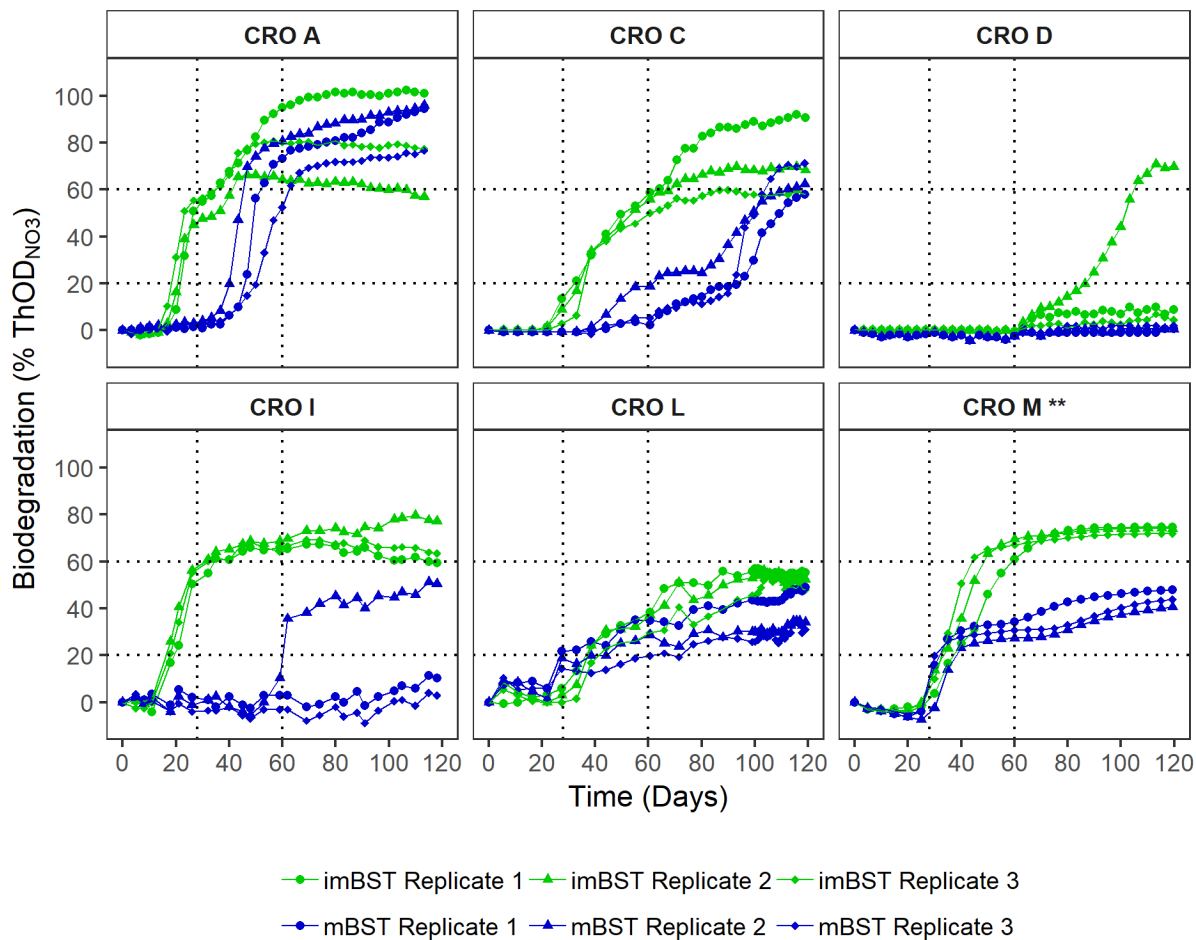
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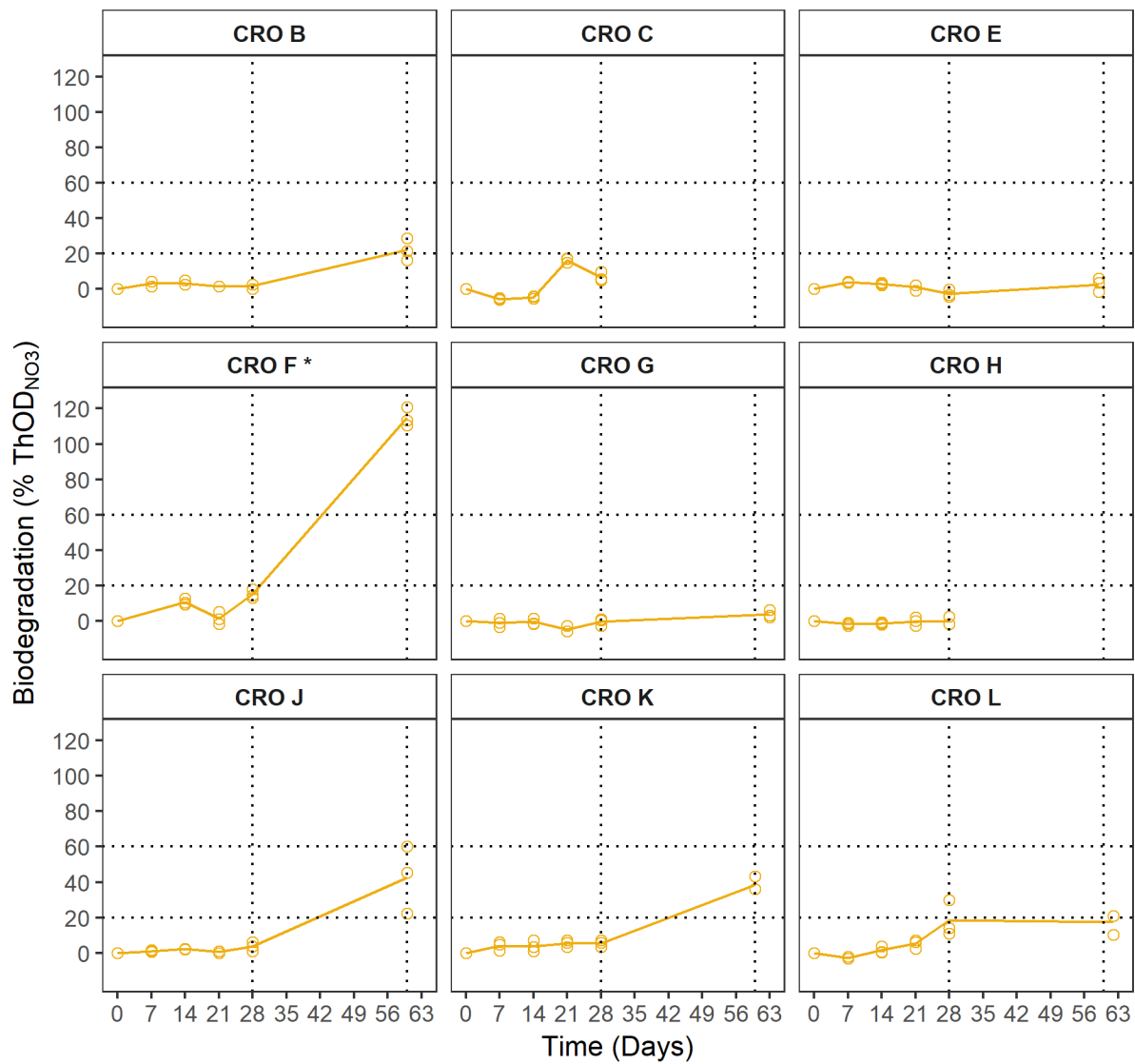
106 **Figure S5.** Biodegradation of sodium benzoate in the OECD306_{CB}. * For removed outlier, see Figure S19.

107



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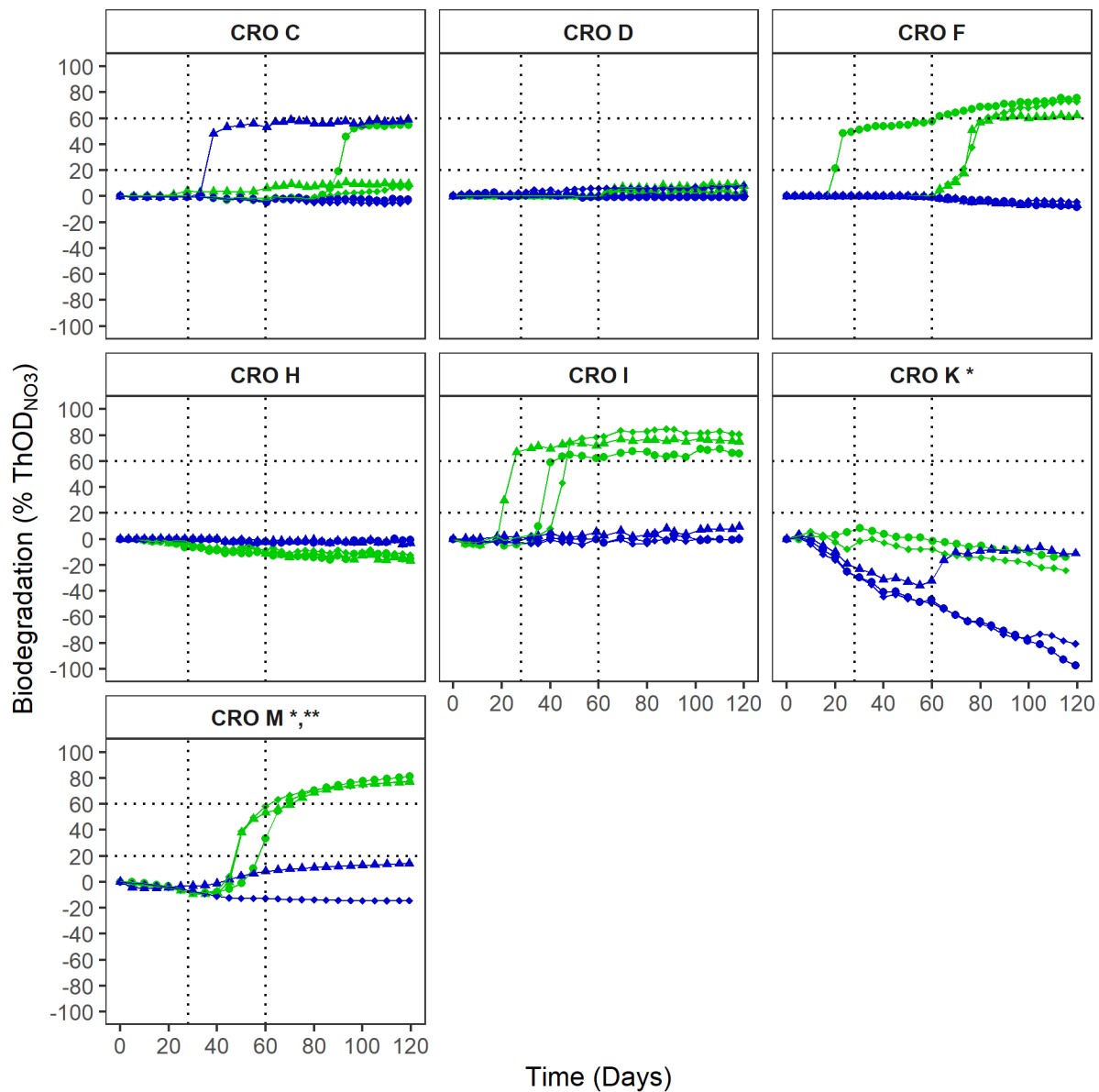
109 **Figure S6.** Biodegradation of triethanolamine in the mBST_{MR} and imBST_{MR}. ** Biodegradation based on
 110 CO₂ production instead of O₂ consumption.



111

112 **Figure S7.** Biodegradation of triethanolamine in the OECD306CB. * For removed outlier, see Figure S19.

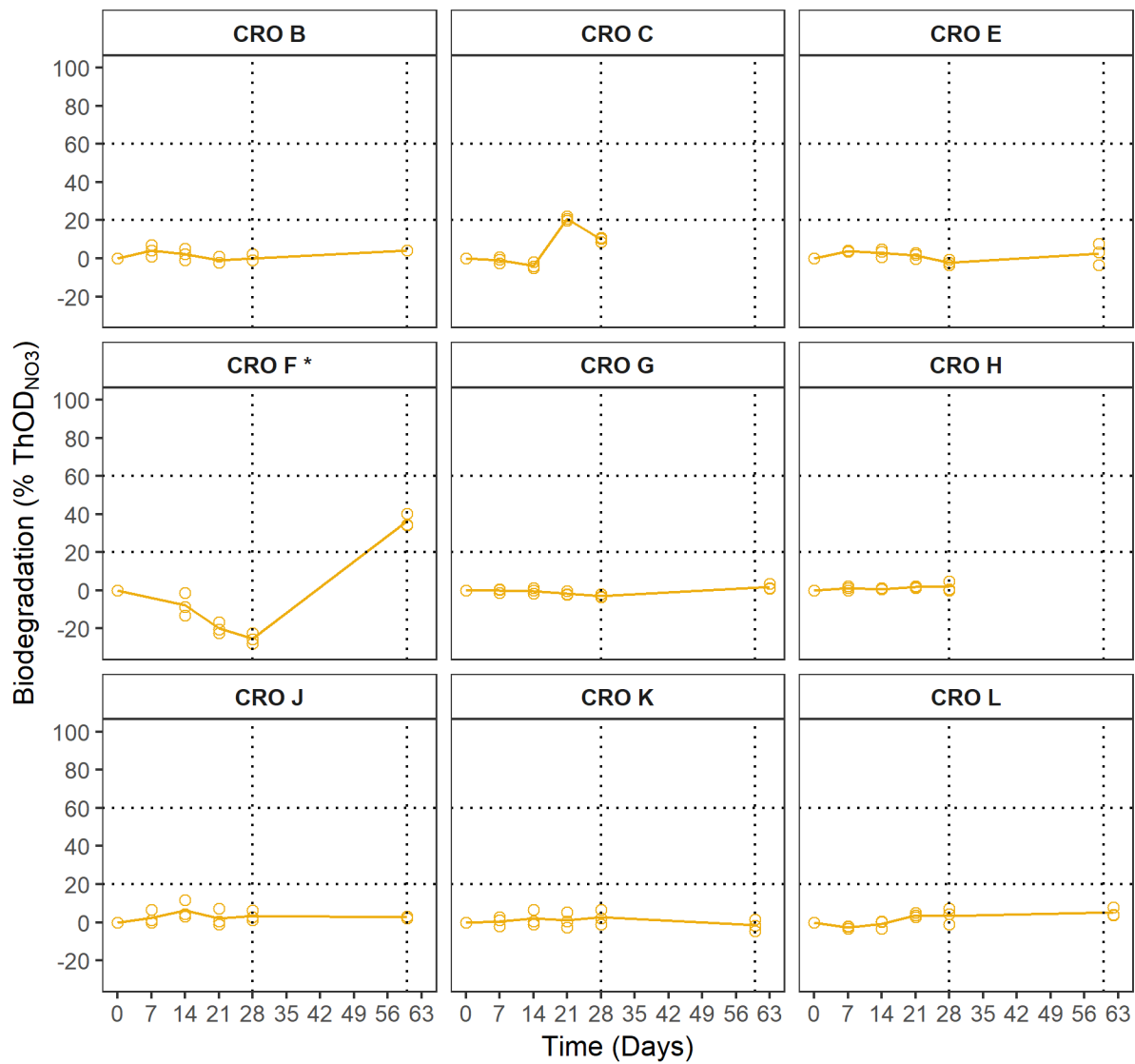
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◆ imBST Replicate 1 ▲ imBST Replicate 2 ◇ imBST Replicate 3
◆ mBST Replicate 1 ▲ mBST Replicate 2 ◇ mBST Replicate 3

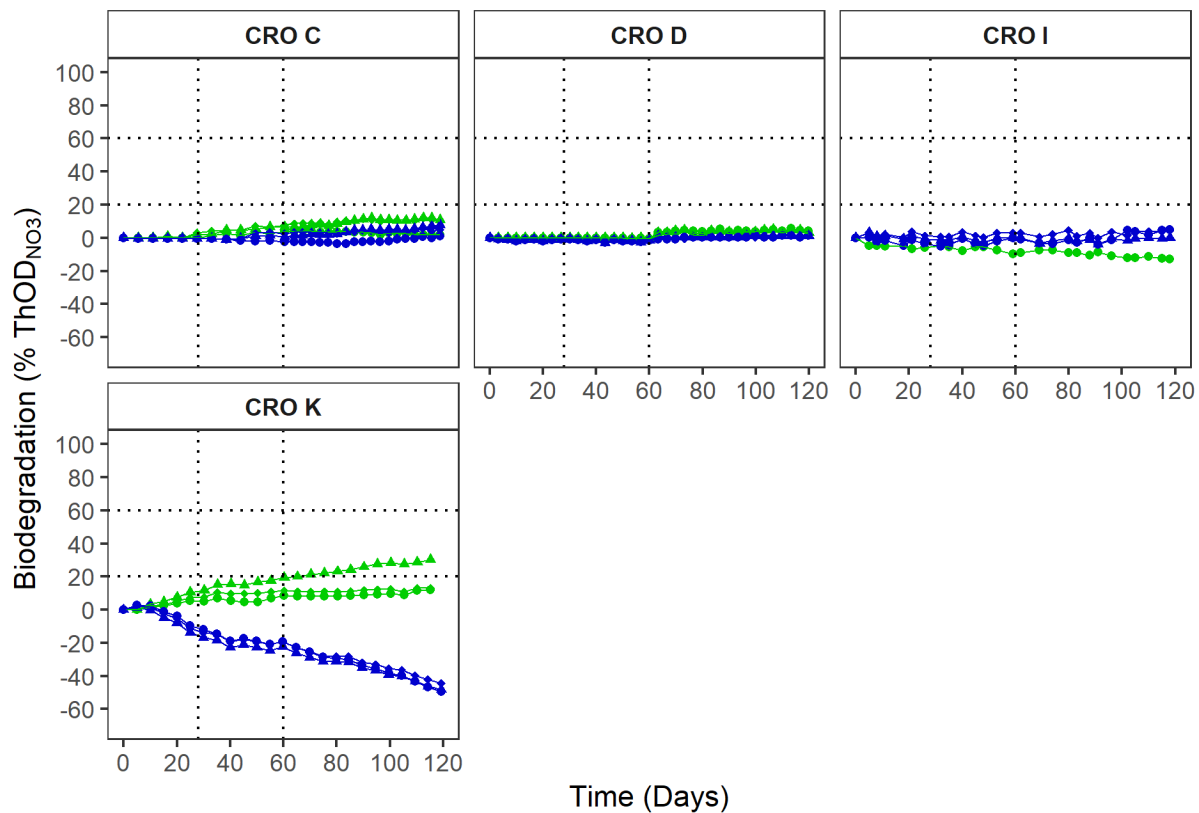
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115 **Figure S8.** Biodegradation of 4-nitrophenol in the mBST_{MR} and imBST_{MR}. * For removed outlier, see
 116 Figure S20. ** Biodegradation based on CO₂ production instead of O₂ consumption.



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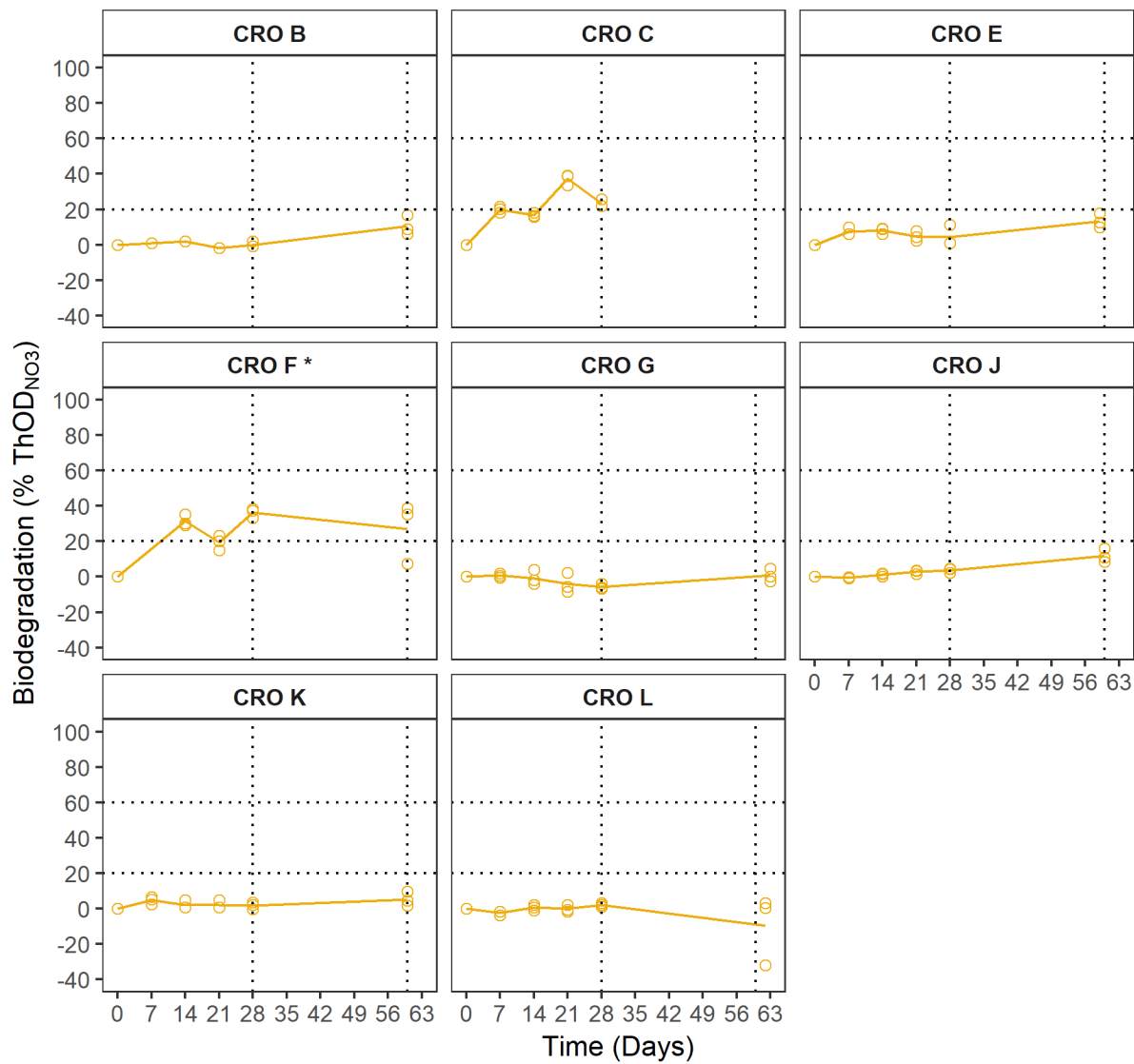
118 **Figure S9.** Biodegradation of 4-nitrophenol in the OECD306_{CB}. * For removed outlier, see Figure S19.



● imBST Replicate 1 ▲ imBST Replicate 2 ◆ imBST Replicate 3
● mBST Replicate 1 ▲ mBST Replicate 2 ◆ mBST Replicate 3

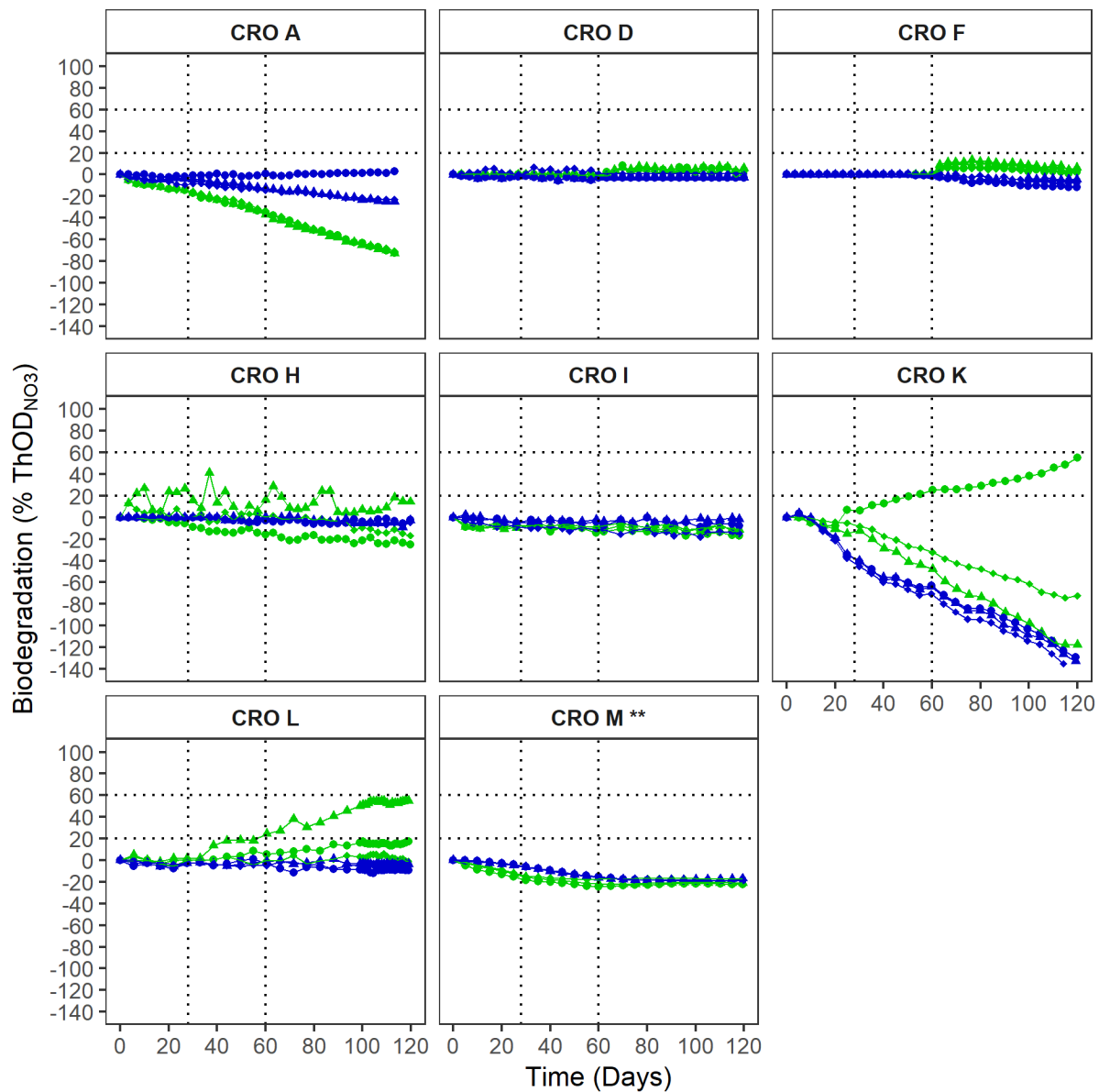
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120 **Figure S10.** Biodegradation of anionic polyacrylamide in the mBST_{MR} and imBST_{MR}.



121

122 **Figure S11.** Biodegradation of anionic polyacrylamide in the OECD306_{CB}. * For removed outlier, see
 123 Figure S19.

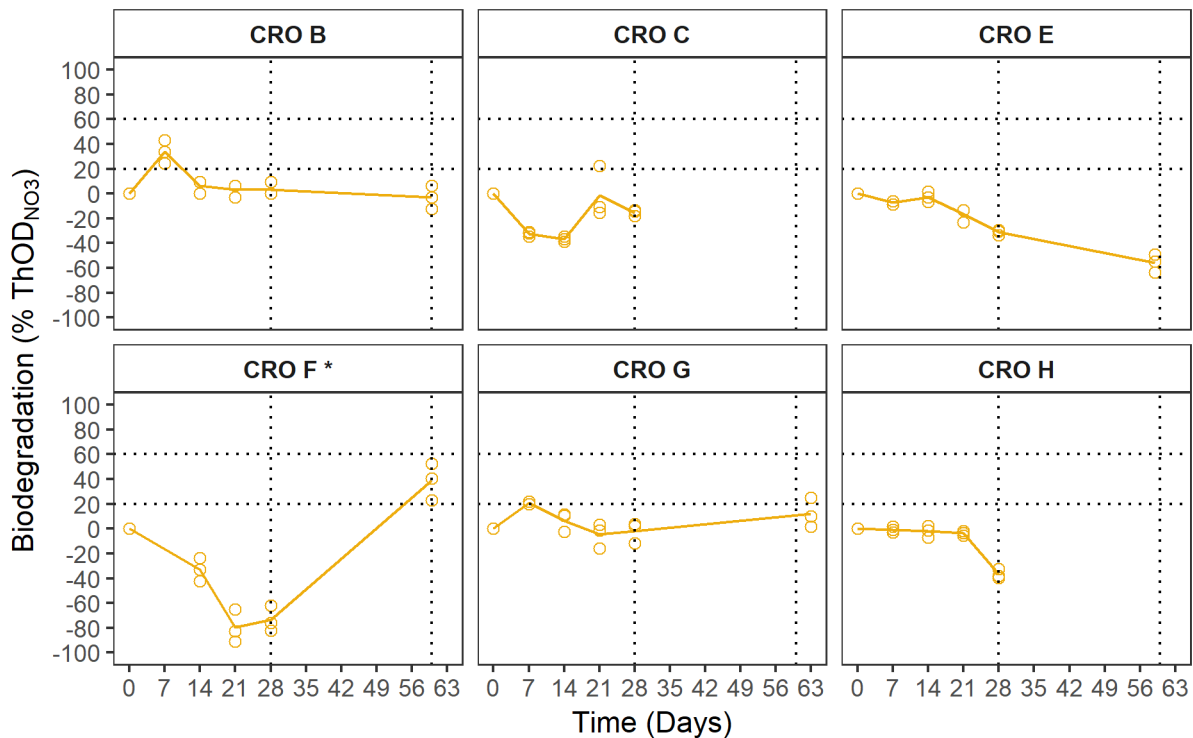


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125 **Figure S12.** Biodegradation of pentachlorophenol in mBST_{MR} and imBST_{MR}. ** Biodegradation based on
 126 CO₂ production instead of O₂ consumption.

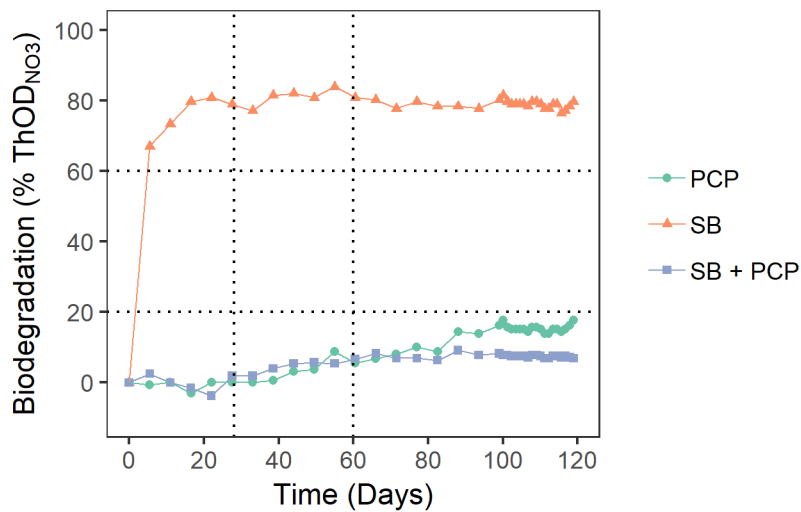
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129
 130 **Figure S13.** Biodegradation of pentachlorophenol in the OECD306_{CB}. * For removed outlier, see Figure
 131 S19.

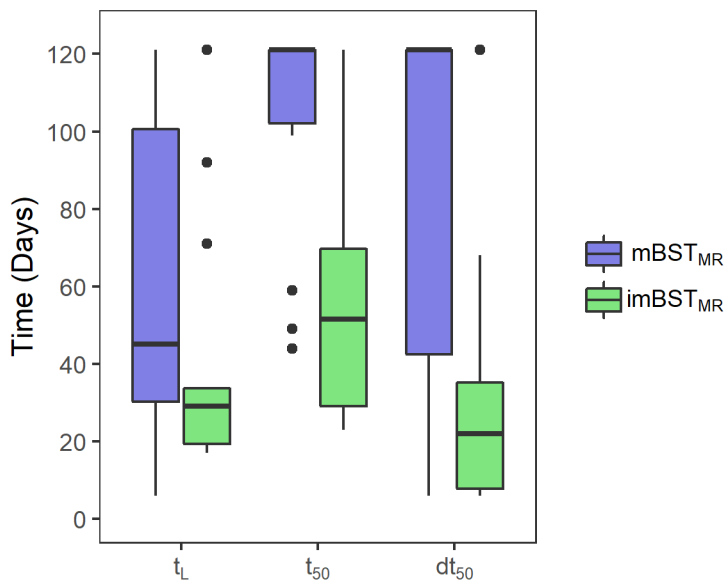
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 134 **Figure S14.** Pentachlorophenol (PCP) toxicity control with sodium benzoate (SB) for the imBST_{MR} by
 135 CRO L.

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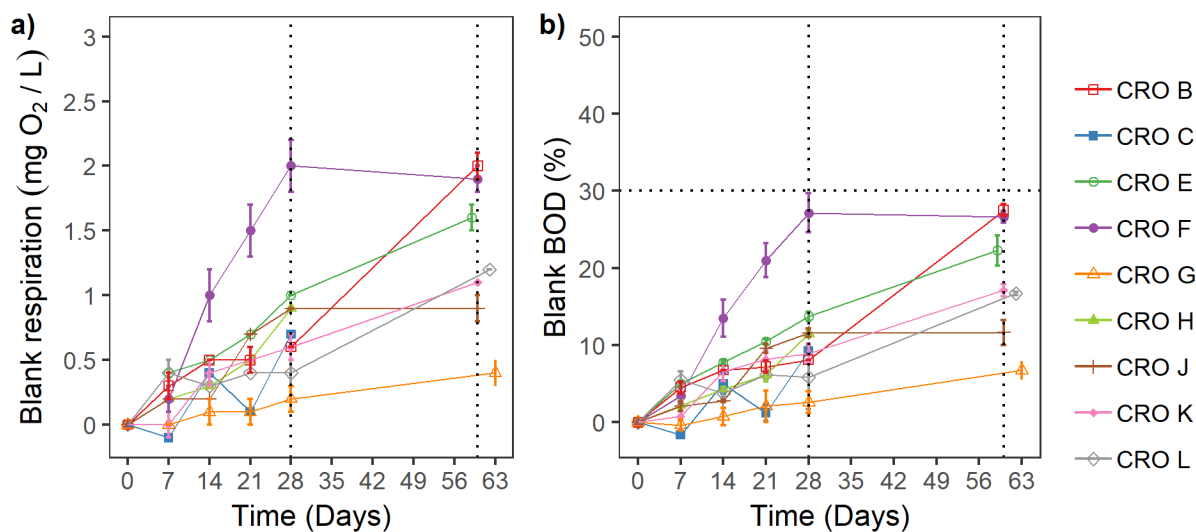
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139 **Figure S15.** Increased cell numbers in the new test reduce t_L (time to 10% degradation), t_{50} (time
 140 to 50% degradation) and dt_{50} ($t_{50} - t_L$) for triethanolamine. For non-degrading $mBST_{MR}$ and
 141 $imBST_{MR}$ replicates, descriptor values were set to 121 days.

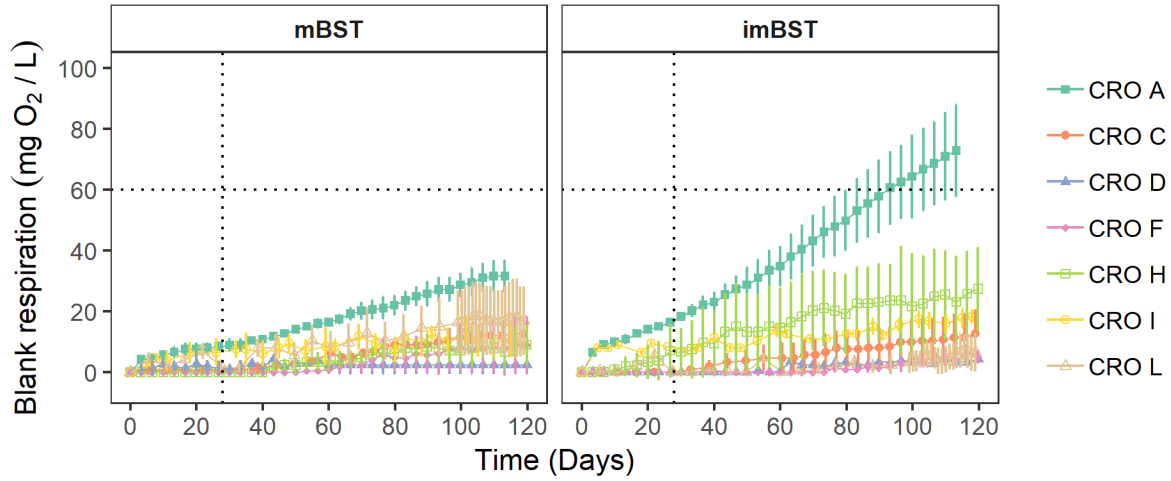
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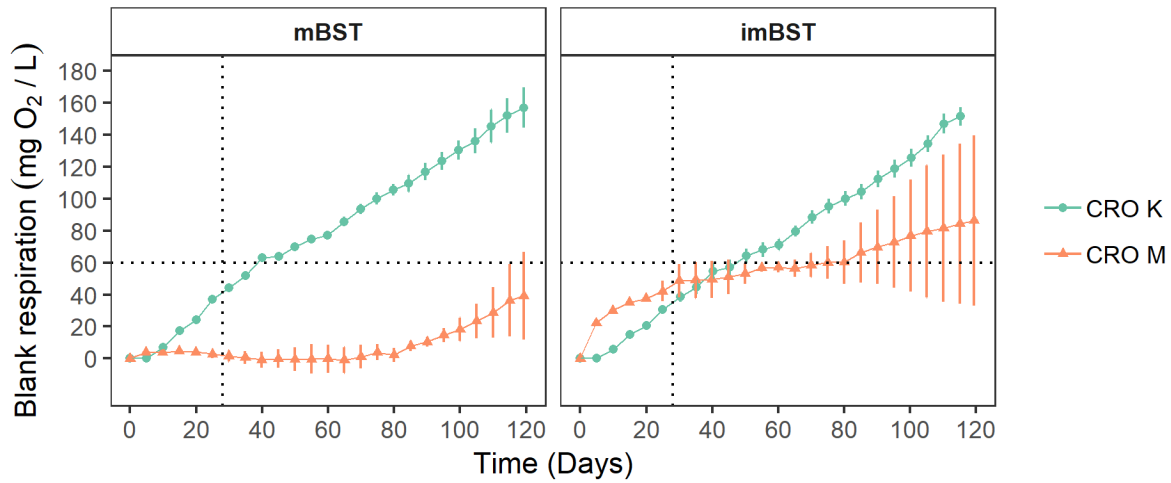
143

144 **Figure S16.** OECD306_{CB} blank respiration over 60 days across CROs expressed in $mg\ O_2\ L^{-1}$ (a) and %
 145 (b). Dotted horizontal line at 30% BOD (b) refers to blank threshold defined in test guideline OECD 306.⁹

a) Closed system manometric respirometers

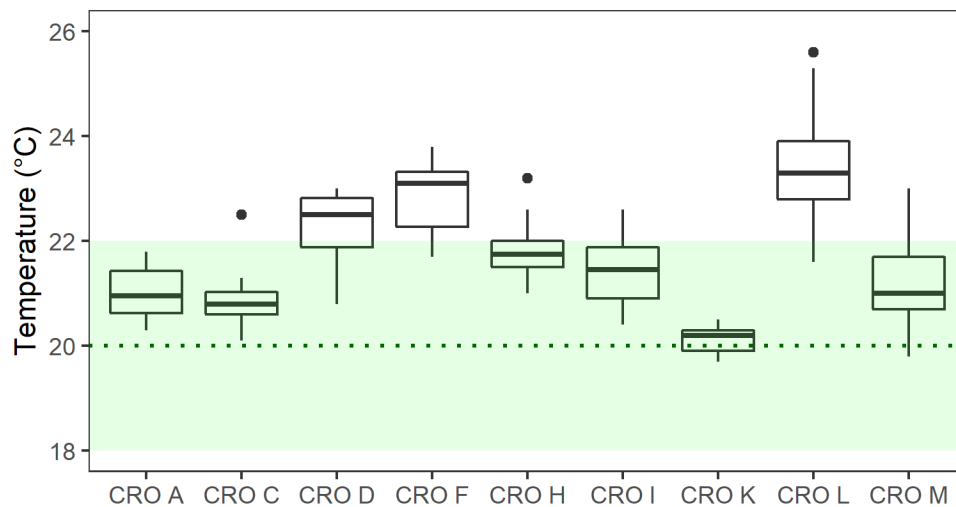


b) Oxygen replenishing manometric respirometers

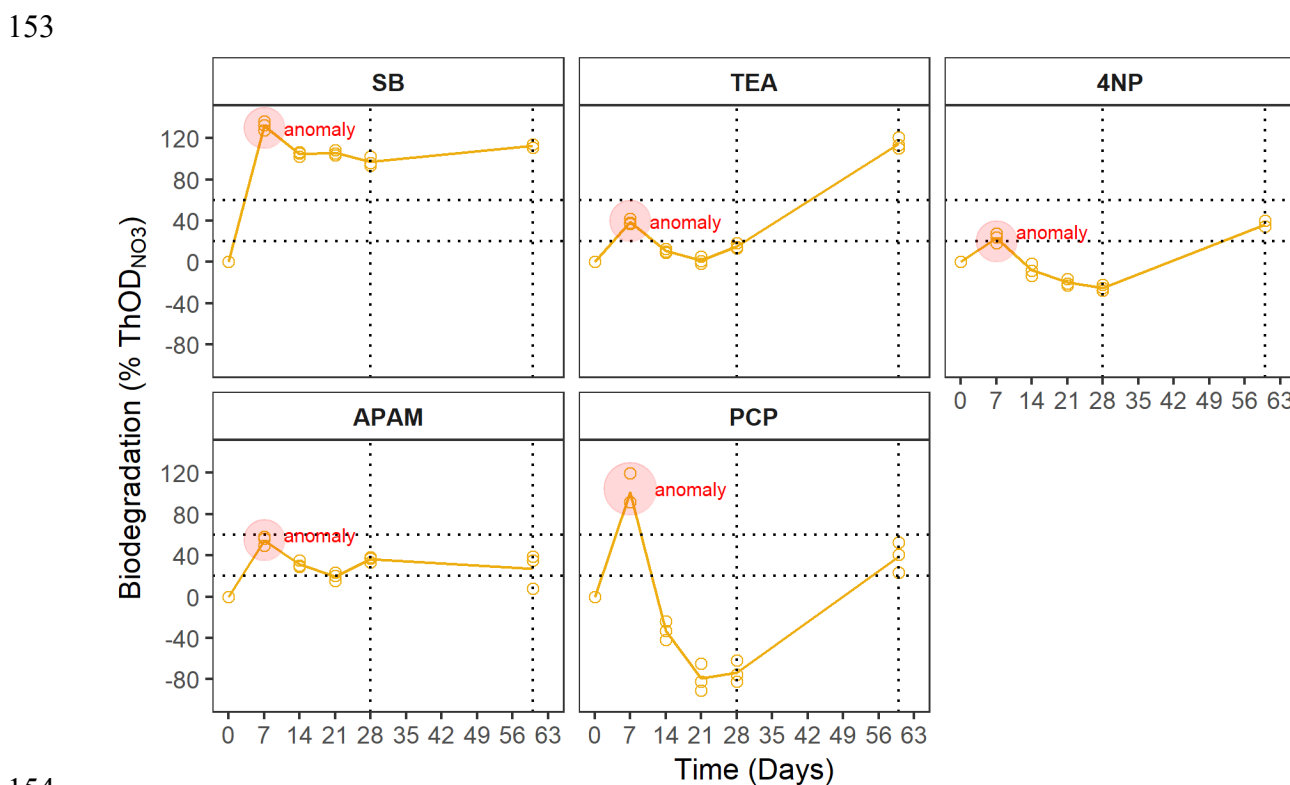


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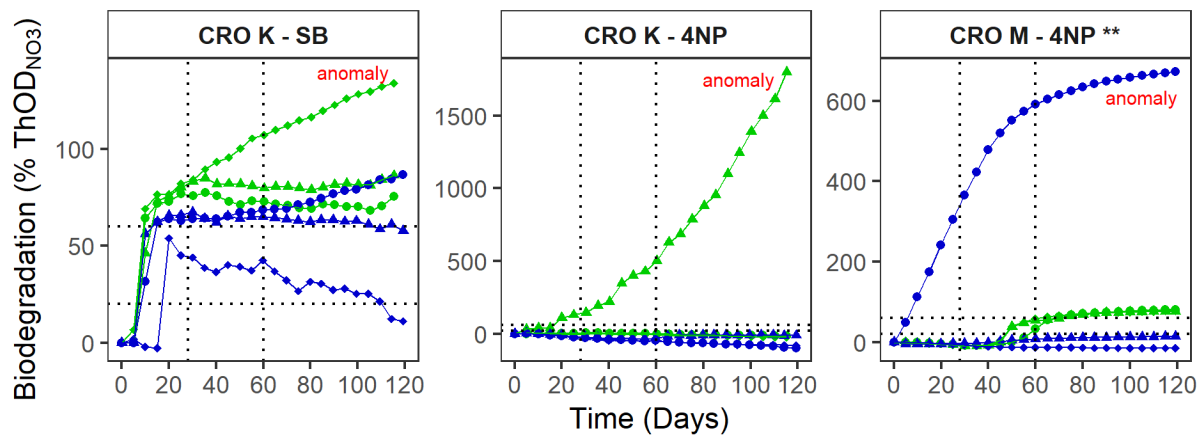
147 **Figure S17.** imBST_{MR} and mBST_{MR} blank respiration in closed manometric respirometer systems (a and
 148 b) and oxygen replenishing manometric respirometer systems (c and d). Dotted horizontal line at
 149 60 mg O₂ L⁻¹ blank respiration and 28 days refers to blank threshold defined in test guideline OECD 301F.⁸



150
 151 **Figure S18.** Boxplots showing temperatures measured in mBST_{MR} and imBST_{MR} test media after 120 day
 152 incubation period across CROs. Green indicates 20 ± 2°C range.



154
 155 **Figure S19.** Systematic anomalous results (marked with a red circle) observed in the OECD306_{CB} at CRO
 156 F. SB: sodium benzoate. TEA: triethanolamine. 4NP: 4-nitrophenol. APAM: anionic polyacrylamide. PCP:
 157 pentachlorophenol.



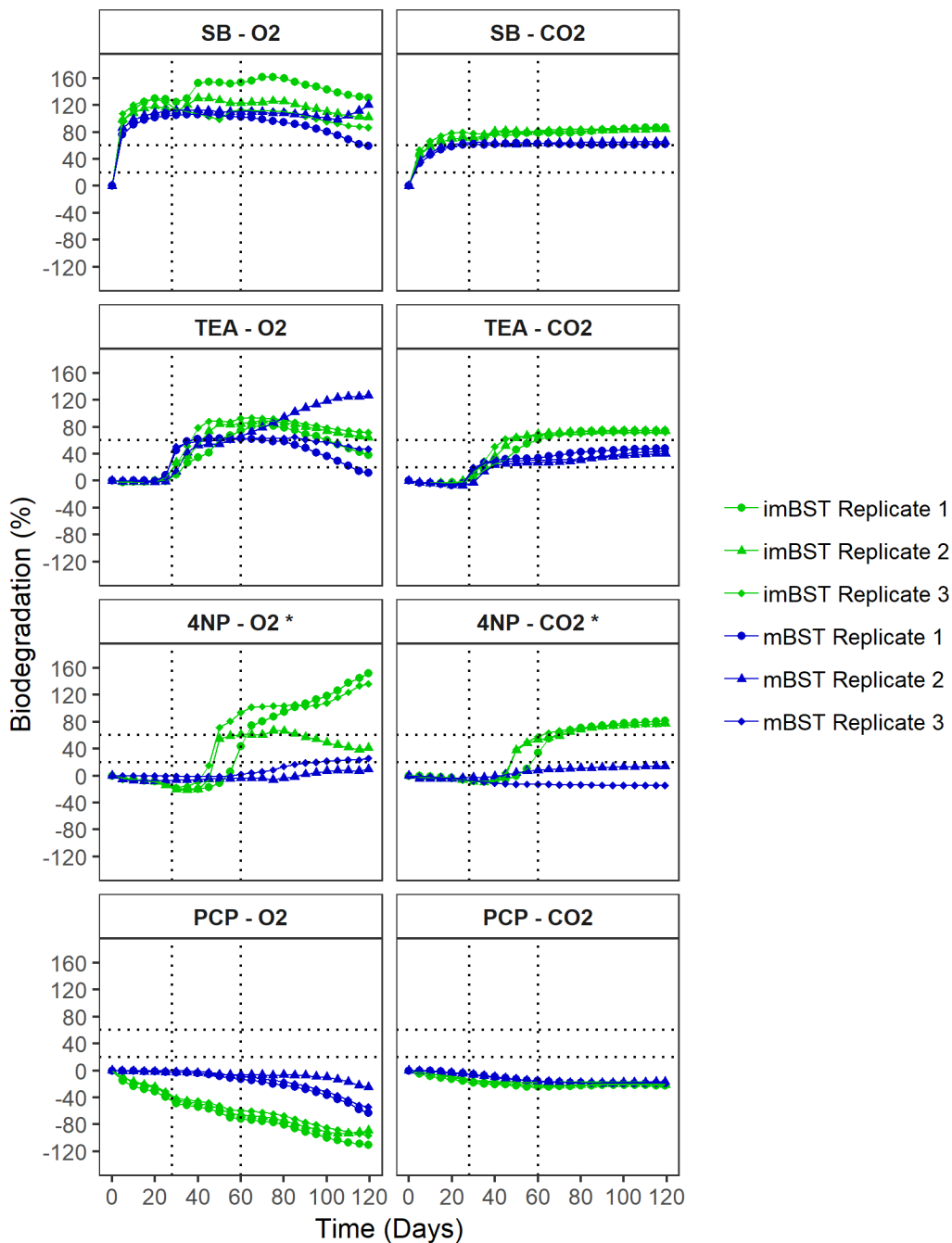
● imBST Replicate 1 ▲ imBST Replicate 2 ◆ imBST Replicate 3
 ● mBST Replicate 1 ▲ mBST Replicate 2 ◆ mBST Replicate 3

159

160 **Figure S20.** Outliers observed in the mBST_{MR} and imBST_{MR}. SB: sodium benzoate. 4NP: 4-nitrophenol.

161 ** Biodegradation based on CO₂ production instead of O₂ consumption.

162



163

164 **Figure S21.** Comparison of biodegradation values calculated based on O₂ consumption and CO₂ production
 165 for CRO M. SB: sodium benzoate. TEA: triethanolamine. 4NP: 4-nitrophenol. PCP: pentachlorophenol. *
 166 For removed outlier, see Figure S20.

167 **Table S1.** Instruments and methods employed at the CROs for the mBST_{MR}, imBST_{MR} and OECD306_{CB}.

CRO →	A	B	C	D	E	F	G	H	I	J	K	L	M
mBST_{MR} and imBST_{MR}													
Manometric respirometer	WTW OxiTop Control	————	WTW OxiTop Control	WTW OxiTop Control	————	WTW OxiTop IS	————	WTW OxiTop Control	WTW OxiTop Control	————	CES multi-channel aerobic respirometer	WTW OxiTop Control	Columbus Instrument Micro-Oxymax Respirometer
OECD306_{CB}													
Removing coarse particles		Filtration (11 µm)	Filtration (10 µm)		Filtration	Not performed	Sedimentation	Sedimentation		Sedimentation	Filtration (coarse filter paper)	Sedimentation and siphoning	
Ageing conditions	————	7 days ageing with 3 days aeration; 20°C; dark	6 days with full aeration; 20°C; dark	————	7 days with full aeration; 20°C; dark	7 days with full aeration; 20°C; dark	7 days with full aeration; 18°C ± 2°C; dark	7 days with full aeration; 20°C; dark	————	7 days with no aeration; 18.4-19°C; dark	10 days with full aeration; 21°C; dark	6 days with aeration for 2h 15 min; 20°C; dark	————
DO (mg/L)		YSI 58	Days 0-14: YSI DO; Days 21-28: Mettler Toledo SevenGo pro DO		Hach HQ40d LDO101	Winkler Titration Method	YSI Oximeter model 5100	WTW Oxi 1970i		Hach HQ30d	YSI Model 57	WTW inoLab Oxi 7310	

168 —: test setup not conducted. DO: dissolved oxygen.

169

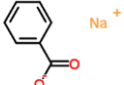
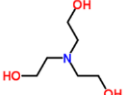
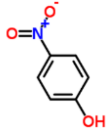
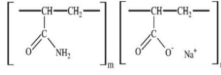
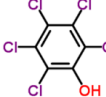
170 **Table S2.** Instruments and methods employed at the CROs to characterize the seawater.

CRO →	A	B	C	D	E	F	G	H	I	J	K	L	M
pH	WTW Multi 350i	Orion Star A111	Hanna HI113 pH/mV	HM-25R, DKK-TOA Corporation	Hach PHC101 probe	Fisher Scientific AP 115	WTW InoLab pH 730	Fisher Scientific Meter 0503	See CRO A as same seawater was used	Handylab pH	Hach HQ30D	WTW pH 340i, PHM220 lab pH	Orion Star A221
T (°C)	WTW Multi 350i	YSI Pro 30	Mercury thermometer	Alcohol thermometer	Hach CDC401 probe	Hach sension5	Total immersion glass thermometer	Thermo Scientific Orion Star		Testo 110	Hach HQ30D	WTW Multi 3430, WTW InoLab Oxi 7310	Alcohol thermometer
DO (mg/L)	Hach HQ 40d	YSI 58 DO Meter	YSI 55 DO	ID-150, Iijima Electronics	Hach LDO101 probe	Hach sension5	YSI Oximeter 5100	Fisher Scientific Meter 0503		Hach HQ30d	Hach HQ30D	WTW Multi 3430, WTW InoLab Oxi 7310	HQ40d meter LBOD101r
Conductivity (mS/cm)	WTW Multi 340i	YSI Pro 30	Mettler Toledo Seven Multi	CM-31P, DKK-TOA Corporation	Hach CDC401 probe	Hach sension5	Not measured	Fisher Scientific Meter 0503		WTW Conductometer	Hach HQ30D	WTW Multi 3430, WTW inoLab Terminal Level 3 Tetracon 325 probe	YSI 3200
Salinity (ppt)	WTW Multi 340i	YSI Pro 30	Mettler Toledo Seven Multi	CM-31P, DKK-TOA Corporation	Hach CDC401 probe	Hach sension5	Thermobalance Satorius MA35	Fisher Scientific Meter 0503		WTW Conductometer	Hach HQ30D	WTW Multi 3430, WTW inoLab Terminal Level 3 Tetracon 325 probe	YSI 3200
HPC/mL	DEV nutrient agar	Serial extinction marine broth bottle test	np.	Trypticase soy agar	Marine Agar	APHA Method 9215	Total viable count	Marine agar		np.	Trypticase soy agar	PCA with seawater	np.

171 DO: dissolved oxygen. HPC: heterotrophic plate counts. np: not performed. T: temperature.

172

173 **Table S3.** Chemical and physical properties of reference chemicals. All data for APAM provided by
 174 chemical supplier SNF. Information for other chemicals obtained from PhysProp¹², except for calculated
 175 ThCO₂ and ThOD_{NH₃/NO₃} values⁹ and chemical structures (obtained from ChemSpider¹³). All chemicals
 176 except APAM purchased from Sigma Aldrich, St. Louis, USA.

	Positive control: Sodium benzoate (SB)	Variable degradation:			Negative control: Pentachlorophenol (PCP)
		Triethanolamine (TEA)	4-Nitrophenol (4NP)	Anionic polyacrylamide (APAM)	
CAS	532-32-1	102-71-6	100-02-7	25937-30-8	87-86-5
Formula	C ₇ H ₅ NaO ₂	C ₆ H ₁₅ NO ₃	C ₆ H ₅ NO ₃	[C ₃ H ₃ NO] _m [C ₃ H ₃ NaO ₂] _l	C ₆ H ₅ Cl ₅ O
Purity	≥ 99.0%	98%	>=99%	/	97%
Structure					
Molecular weight (g/mol)	144.11	149.19	139.11	7.6 M Da	266.34
Water solubility (mg/L)	5.56 x 10 ⁵ at 25°C, exp.	1.00 x 10 ⁶ at 22°C, exp.	1.16 x 10 ⁴ at 20°C, exp.	100%	14 at 25°C, exp.
Vapour pressure (mm Hg)	3.67 x 10 ⁻⁹ at 25°C, est.	3.59 x 10 ⁻⁶ at 25°C, exp.	9.79 x 10 ⁻⁵ at 20°C, exp.	information not available	1.10 x 10 ⁻⁴ at 25°C, exp.
Henry's law constant at 25°C (atm·m ³ /mol)	1.09 x 10 ⁻⁷ , est.	7.05 x 10 ⁻¹³ , est.	4.15 x 10 ⁻¹⁰ , exp.	information not available	2.45 x 10 ⁻⁸ , exp.
Log K _{ow}	-2.27, est.	-1, exp.	1.19, exp.	-2.34, exp.	5.12, exp.
ThOD _{NH₃} and ThOD _{NO₃} (mg O ₂ /mg test substance)	1.67 1.67	1.61 2.04	1.15 1.61	1.25 1.88	0.54 0.54
ThCO ₂ (mg CO ₂ /mg test substance)	2.14	1.77	1.90	information not available	0.99

177 est: estimated data. exp: experimental data.

178

179 **Table S4.** Explanation on test chemical selection and assigned “correct” biodegradation classification to
 180 compare the results of the standard OECD 306 test, the revised test and the new test. Note that these
 181 assigned biodegradation classifications are not definitive as they are restricted by the quality and scope of
 182 the evaluated data.^{1,14}

Assigned reference biodegradation classification	Previously reported biodegradation data and explanation on test chemical selection
Sodium benzoate (SB); rapidly biodegradable – non persistent	<ul style="list-style-type: none"> – ECHA database: Readily biodegradable;¹⁵ – Comber and Holt (2010) grouped SB in bin 1 (would normally pass a BST and enhanced BST);¹⁶ – Positive control in BSTs OECD 301, 306, 310;^{4,8,9}
Triethanolamine (TEA); rapidly biodegradable – non persistent	<ul style="list-style-type: none"> – ECHA database: Readily biodegradable;¹⁷ – Recommended by regulators for testing in ring test; – Variable degradation observed in BSTs ranging from 0-100%: <ul style="list-style-type: none"> ○ Eide-Haugmo et al. (2012) found TEA to degrade 20% in 28 days in OECD 306 Closed Bottle test;¹⁸ ○ Unpublished results vary from under 20% to over 60% biodegradation after 28 days for OECD 306 Closed Bottle test (Cefas, personal communication, 2016); ○ Gerike and Fisher (1979) found TEA to degrade 91-100% in 28 days in Sturm test, 97% in 42 days in AFNOR test, 96% in 19 days in precursor to OECD 301E test, 0-2% in 14 days in MITI test and 0-9% in 30 days in Closed Bottle test;¹⁹
4-nitrophenol (4NP); inherently biodegradable – non persistent	<ul style="list-style-type: none"> – ECHA database: Inherently biodegradable;²⁰ – Comber and Holt (2010) grouped 4NP in bin 2 (would normally fail a current BST, but pass an enhanced BST);¹⁶ – Previously tested during intra-laboratory activated sludge and marine BST validation;^{1,21} – Variable degradation observed in BSTs ranging from 0-100%: <ul style="list-style-type: none"> ○ Nyholm and Kristensen (1987) found 4NP to degrade in OECD 306 Closed Bottle tests 38% in 28 days and 0-64% in 60 days; 4NP degraded in OECD 306 Shake Flask tests 35-54% in 28 days and 0-100% in 60 days (results from OECD 306 ring test 1984-85);^{22,23} ○ Ott et al. (2019) found 4NP to degrade 3-91% in 60 days in marine OECD 301B tests with varying cell concentrations;¹ ○ Martin et al. (2017) found 4NP to degrade 84-91% in 60 days in activated sludge OECD 301B tests with varying cell concentrations;²¹ ○ Gerike and Fisher (1979) found 4NP to degrade 90-98% in 28 days in Sturm test, 97% in 42 days in AFNOR test, 100% in 19 days in precursor to OECD 301E test, 1-3% in 14 days in MITI test and 0-60% in Closed Bottle test;¹⁹
Anionic polyacrylamide (APAM); no reference biodegradation classification assigned	<ul style="list-style-type: none"> – No information available in ECHA database as polymers are exempt from REACH;²⁴ – Recommended by industry for testing in ring test: polyacrylamides (PAMs) are widely used in several industrial fields such as for water treatment, agriculture and oil recovery;²⁵ – Previous research found PAM macromolecules resistant to microbial attack, requiring initial physical-chemical breakdown;^{26,27} – Unpublished biodegradability data shows no degradation for OECD 306 Closed Bottle test, marine BODIS test or Zahn Wellens test (SNF, personal communication, 2018); – Variable degradation reported in unpublished imBST_{MR}-similar industry study with 100-fold increased bacterial cell concentrations from seawater measuring O₂ consumption with MRs and 400 mg/L APAM (Equinor, personal communication, 2016): <ul style="list-style-type: none"> ○ Study 1, April: over 20% biodegradation measured in 120 days; ○ Study 2, November: no biodegradation detected in 90 days; – Due to a lack of peer-reviewed reference literature for APAM, it was not possible to assign a “correct” biodegradation classification; consequently, APAM results in the ring test were discussed separately to data of SB, TEA, 4NP and PCP;
Pentachlorophenol (PCP); potentially persistent	<ul style="list-style-type: none"> – Not registered under REACH²⁸, but the Finish Environment Institute (SYKE) database indicates potential persistence based on BST results;²⁹ – Comber and Holt (2010) grouped PCP in bin 3 (should normally fail a BST and enhanced BST);¹⁶ – Previously tested during intra-laboratory activated sludge and marine BST validation;^{1,21} – Variable degradation observed in different biodegradation test, depending on PCP concentration and adaptation: <ul style="list-style-type: none"> ○ Ott et al. (2019) found radiolabeled PCP at 10 mg/L to not degrade (0-1%) in 60 days in marine OECD 301B tests with varying cell concentrations;¹ ○ Martin et al. (2017) found radiolabeled PCP at 10 mg/L to not degrade (0-1%) in 60 days in activated sludge OECD 301B tests with varying cell concentrations;²¹ ○ Lapertot and Pulgarin (2006) found PCP to not degrade (0%) in 28 days in inherent test OECD 302B, but concluded that this may have been the result of substrate inhibition;³⁰ ○ Ingerslev et al. (1998) observed PCP degradation in shake flask simulation tests in unadapted systems only after long acclimation phases (14-85 days in river water tests), but PCP degradation rates increased in adapted systems; no or little degradation was observed at inhibitory PCP concentrations above 20 mg/L, but PCP degraded quickly (t₅₀ = 3-10 days) at concentrations under 2.5 mg/L;³¹ – Toxicity^{31,32} and low solubility concerns; however, PCP was most suitable negative control after screening 34 potential compounds proposed from regulators and recommendations from previous report;^{16,33}

184 **Table S5.** Chemical and test strategy. Overview of the test setups and chemicals tested at each anonymised
 185 CRO, labelled CRO A-M. The number of each test method, per chemical, is included in the last row
 186 of the table.

CRO	OECD306 _{CB}						mBST _{MR}						imBST _{MR}					
	B	SB	TEA	4NP	APAM	PCP	B	SB	TEA	4NP	APAM	PCP	B	SB	TEA	4NP	APAM	PCP
A							X	X	X			X	X	X	X			X
B	X	X	X	X	X	X												
C	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
D							X	X	X	X	X	X	X	X	X	X	X	X
E	X	X	X	X	X	X												
F	X	X	X	X	X	X	X	X		X		X	X	X		X		X
G	X	X	X	X	X	X												
H	X	X	X	X		X	X	X		X		X	X	X		X		X
I							X	X	X	X	X	X	X	X	X	X	X	X
J	X	X	X	X	X													
K	X	X	X	X	X	X	X	X		X	X	X	X	X		X	X	X
L	X	X	X	X	X		X		X			X	X	X	X			X
M							X	X	X	X		X	X	X	X	X		X
Total:	9	9	9	9	8	7	9	8	6	7	4	9	9	9	6	7	4	9

187 B: blank. SB: sodium benzoate. TEA: triethanolamine. 4NP: 4-nitrophenol. APAM: anionic
 188 polyacrylamide. PCP: pentachlorophenol.

189

190

191 **Table S6.** Oxygen available in the OECD306_{CB} and closed system MR systems.

Assumptions	
<ul style="list-style-type: none"> – “At 15°C and 20°C and 32 parts per thousand salinity (ocean water), the solubility of dissolved oxygen is about 8.1 and 7.4 mg/l, respectively.”⁹ – OECD306_{CB}: fill volume 300 mL, no headspace, incubation temperature 20°C; – mBST_{MR} and imBST_{MR}: fill volume 250 mL, headspace 260 mL, incubation temperature 20°C; – For the imBST_{MR} and mBST_{MR}, calculations are only relevant for closed MR systems (OxiTop), as the other MR systems (CES respirometer and Micro-Oxymax) replenish oxygen immediately after consumption; – Molecular mass O₂: 32 g/mol; 21% O₂ in air; ideal gas at 20°C, 1 atm: 24.04 L/ mol; 	
OECD306_{CB}:	mBST_{MR} and imBST_{MR}
<u>O₂ in liquid phase:</u> 0.3 L x 7.4 mg O ₂ /L = 2.22 mg O ₂ <u>O₂ in headspace:</u> /	<u>O₂ in liquid phase:</u> 0.25 L x 7.4 mg O ₂ /L = 1.85 mg O ₂ <u>O₂ in headspace:</u> Volume O ₂ in headspace: 0.26 L x 0.21 = 0.055 L O ₂ ; $n(\text{O}_2) = 0.055 \text{ L O}_2 \div 24.04 \text{ L/mol} = 2.29 \times 10^{-3} \text{ mol O}_2$ $m(\text{O}_2) = 32 \text{ g/mol} \times 2.29 \times 10^{-3} \text{ mol O}_2 = 7.33 \times 10^{-2} \text{ g}$ = 73.28 mg O ₂
Total O₂ in OECD306_{CB} bottle: 2.22 mg O ₂ + 0 mg O ₂ = <div style="text-align: right;">2.22 mg O₂</div>	Total O₂ in imBST_{MR} or mBST_{MR} bottle: 1.85 mg O ₂ + 73.28 mg O ₂ = <div style="text-align: right;">75.13 mg O₂</div>
$75.13 \text{ mg O}_2 \div 2.22 \text{ mg O}_2 = 33.84$ In this study, MR test setups provide at least 34-times more O ₂ than the OECD306 _{CB} test setup.	

192

193 **Table S7.** Raw and processed seawater characterization. CRO A and I used seawater collected and processed from the same source. All analysis
 194 except TCC performed by CROs (methods see Table S2). Temperature measurement S1 does not always represent original seawater temperature.

Description		CRO A	CRO B	CRO C	CRO D	CRO E	CRO F	CRO G	CRO H	CRO I	CRO J	CRO K	CRO L	CRO M	
Seawater collection	Collection date OECD306 _{CB}	_____	01.06.17	09.03.17	_____	30.05.17	01.05.17	23.05.17	06.04.17	See CRO A	02.06.17	24.04.17	14.03.17	_____	
	Collection date MR tests	27.03.17	_____	07.03.17	08.05.17	_____	01.05.17	_____	04.04.17		_____	24.04.17	14.03.17	14.08.17	
	Depth (m)	6	3	nr.	10	2	10	50	nr.		_____	10	nr.	60	0.5
	Distance offshore (m)	40-50	45	67	300	100	250	5000	nr.		_____	100	nr.	nr.	200
	Water appearance	Clear	Clear	Clear	Clear	Clear	Slightly turbid	Clear	Clear		_____	Clear	Clear	Clear	Clear
	Date setup OECD306 _{CB}	_____	14.06.17	15.03.17	_____	06.06.17	11.05.17	30.05.17	13.04.17		_____	09.06.17	04.05.17	21.03.17	_____
	Date setup MR tests	31.03.17	_____	08.03.17	13.05.17	_____	04.05.17	_____	06.04.17		31.03.17	_____	26.04.17	15.03.17	17.08.17
Raw seawater (S1)	pH	8.0	7.8	8	8.1	7.9	7.40	8	7.70	See CRO A	8.2	7.8	8	7.9	
	T (°C)	10.4	24.9	18.7	17.8	19.2	9.0	22.0	15.6		12.0	10.4	14.9	2.8	
	DO (mg/L)	10.3	6.0	8	9.5	9.19	7.9	7.4	7.85		9.6	11.1	7.9	12.	
	Conductivity (mS/cm)	24.0	44.1	45.3	44.3	46.7	45.0	np.	48.10		43.8	45.8	53.3	42.7	
	Salinity (ppt)	16.1	28.7	32.2	27.5	34.7	28.0	34.1	30.60		31.1	29.6	34.6	27.5	
	HPC x 10 ³ /mL	82	10	np.	0.92	0.48	0.5	2	4.5		np.	2	Not countable	np.	
	TCC x 10 ⁵ /mL	5.4 ± 0.4	_____	2 ± 0.094	2.8 ± 0.21	_____	3.1 ± 0.49	_____	0.6 ± 0.034		_____	0.7 ± 0.07	1.1 ± 0.04	7.5 ± 0.21	
10 μm filtered seawater for mBST _{MR} (S2)	pH	8.7	_____	8	_____	_____	_____	_____	7.80	See CRO A	_____	6.76	8.	8	
	T (°C)	19.1	_____	18.7	_____	_____	_____	_____	16.00		_____	19.7	10.7	0.9	
	DO (mg/L)	8.8	_____	8	np.	_____	np.	_____	7.72		_____	9.3	8.3	13.4	
	Conductivity (mS/cm)	24.5	_____	45.3	_____	_____	_____	_____	48.10		_____	48.4	53.5	41.1	
	Salinity (ppt)	16.7	_____	32.2	_____	_____	_____	_____	30.60		_____	30.3	34.4	26.3	
	HPC x 10 ³ /mL	Not countable	_____	np.	0.39	_____	0.2	_____	2.1		_____	0.65	4	np.	
	TCC x 10 ⁵ /mL	4.8 ± 0.36	_____	2.4 ± 0.37	1.6 ± 0.12	_____	1.2 ± 0.0094	_____	0.4 ± 0.02		_____	0.86 ± 0.12	1.87 ± 0.12	5.4 ± 0.15	
TFF processed seawater for	pH	8.8	_____	7.9	_____	_____	_____	_____	7.80	See CRO A	_____	7.1	8	7.6	
	T (°C)	19.0	_____	18.9	np.	_____	np.	_____	16.10		_____	19.8	12.6	6.0	
	DO (mg/L)	8.5	_____	8.1	_____	_____	_____	_____	7.23		_____	9	8.5	11.4	

Description		CRO A	CRO B	CRO C	CRO D	CRO E	CRO F	CRO G	CRO H	CRO I	CRO J	CRO K	CRO L	CRO M
imBST _{MR} (S3)	Conductivity (mS/cm)	24.4		45.7					48.00			48.1	53.6	42.6
	Salinity (ppt)	16.6		33.2					30.60			31.3	34.6	27.4
	HPC x 10 ⁴ / mL	140		np.	0.19		0.37		49			Not countable	20	np.
	TCC x 10 ⁷ / mL	7.6 ± 0.14		0.37 ± 0.041	2.4 ± 0.096		1.3 ± 0.035		0.71 ± 0.0036			0.16 ± 0.0054	0.26 ± 0.013	12 ± 0.99
Aged seawater for OECD306 _{CB} (S4)	pH		8.00	8		7.9	7.3	8	8.2		8.2	8.3	7.8	
	T (°C)		19.80	19.6		20.0	20.3	19.0	19.7		18.6	21.2	19.7	
	DO (mg/L)		7.40	7.5		9.0	7.7	6.4	7.6		7.8	9	7.6	
	Conductivity (mS/cm)	—	44.1	49.0	—	46.1	44.6	np.	48.8	—	43.6	44.6	52.5	—
	Salinity (ppt)		28.50	34.7		33.1	31.0	34.1	31.6		31.4	31.5	34.4	
	HPC x 10 ⁴ / mL		10	np.		6.8	0.012	0.06	0.3		np.	0.33	10	

195 —: test setup not conducted. HPC: heterotrophic plate counts. nr: not recorded. np: not performed. T: temperature. TCC: total cell counts.

196

197 **Table S8.** Effect of pretreatment on bacteria concentrations in OECD306_{CB} and imBST_{MR}. Coloring
 198 indicates fold cell increase (green) and fold cell reduction (red) between treatment steps. CRO A and I used
 199 the same seawater.

Test	Fold change	CRO A/I	CRO B	CRO C	CRO D	CRO E	CRO F	CRO G	CRO H	CRO J	CRO K	CRO L	CRO M
OECD306 _{CB}	S1→S4	—	94	np.	—	141.7	0.2	0.3	0.7	np.	1.7	25	—
imBST _{MR}	S1→S3	140.4	—	18.8	88	—	42	—	118.9	—	23.3	23.7	160.2
	S2→S3	156.2	—	14.8	148	—	103	—	180.6	—	19.1	14.1	221.8

200 —: test setup not conducted. S1: raw seawater. S2: 10 µm filtered seawater. S3: 10 µm filtered and TFF
 201 treated seawater to increase bacteria concentrations 100-fold nominally. S4: seawater after OECD 306
 202 pretreatment (filtered/sedimented and aged). np: analysis not performed.

203

204 **Table S9.** Chemical degradation of reference compounds in the three test systems in respect to CROs as
 205 evaluated against two regulatory persistence thresholds. Cursive brackets state the number of CROs out of
 206 all CROs where the reference compound degraded in at least 2/3 replicates to pass the stated persistence
 207 criteria and classify as non-persistent.

	Current test: OECD306 _{CB}		Revised test: mBST _{MR}		New test: imBST _{MR}	
	Not persistent under OSPAR ^a	Not persistent under REACH ^b	Not persistent under OSPAR ^a	Not persistent under REACH ^b	Not persistent under OSPAR ^a	Not persistent under REACH ^b
SB	100% (9/9)	100% (7/7)	100% (8/8)	100% (8/8)	100% (9/9)	100% (9/9)
TEA	0% (0/9)	14% (1/7)	0% (0/6)	17% (1/6)	33% (2/6)	50% (3/6)
4NP	11% (1/9)	0% (0/7)	0% (0/7)	0% (0/7)	0% (0/7)	14% (1/7)
APAM	25% (2/8)	0% (0/7)	0% (0/4)	0% (0/4)	0% (0/3)	0% (0/3)
PCP	33% (2/6)	0% (0/4)	0% (0/8)	0% (0/8)	0% (0/8)	0% (0/8)

208 ^a OSPAR: Biodegradation ≥ 20% over 28 days = non-persistent; biodegradation < 20% over 28 days =
 209 persistent³⁴

210 ^b REACH: Biodegradation ≥ 60% over 60 days = non-persistent; biodegradation < 60% over 60 days =
 211 potentially persistent³⁵

212

213 **Table S10.** Overview of sodium benzoate (SB) degradation in the three test systems based on replicates.
 214 The mean biodegradation values recorded on day 28, 60 and 120 are stated. Lag phase (t_L), time to reach
 215 50% degradation (t_{50}) and dt_{50} ($t_{50}-t_L$) were only determined for the $mBST_{MR}$ and $imBST_{MR}$ tests. Cursive
 216 values state the number of SB replicates out of all performed SB replicates, which were used to calculate
 217 the respective benchmark criteria.

	OECD306 _{CB}		$mBST_{MR}$		$imBST_{MR}$	
	Mean \pm SD	<i>R</i>	Mean \pm SD	<i>R</i>	Mean \pm SD	<i>R</i>
Day 28	73 \pm 15 %	27/27	73 \pm 14 %	22/22	77 \pm 9 %	26/26
Day 60	82 \pm 15 %	21/21	77 \pm 15 %	22/22	80 \pm 9 %	26/26
Day 120	ND		76 \pm 20 %	22/22	81 \pm 16 %	26/26
t_L	ND		4 \pm 3 d	22/22	2 \pm 1 d	26/26
t_{50}	ND		7 \pm 4 d	22/22	4 \pm 2 d	26/26
dt_{50}	ND		3 \pm 3 d	22/22	2 \pm 1 d	26/26

218 ND: not defined. R: replicate numbers. SD: standard deviation.

219

220 **Table S11.** Overview of triethanolamine (TEA) degradation in the three test systems in respect to
 221 replicates. The mean biodegradation values recorded on day 28, 60 and 120 are stated. Lag phase (t_L),
 222 time to reach 50% degradation (t_{50}) and dt_{50} ($t_{50}-t_L$) were only determined for the $mBST_{MR}$ and $imBST_{MR}$
 223 tests. Cursive values state the number of TEA replicates out of all performed TEA replicates, which were
 224 used to calculate the respective benchmark criteria.

	OECD306 _{CB}		$mBST_{MR}$		$imBST_{MR}$	
	Mean \pm SD	<i>R</i>	Mean \pm SD	<i>R</i>	Mean \pm SD	<i>R</i>
Day 28	6 \pm 7 %	27/27	4 \pm 6 %	18/18	20 \pm 24 %	18/18
Day 60	28 \pm 33 %	20/20	24 \pm 25 %	18/18	51 \pm 28 %	18/18
Day 120	ND		43 \pm 31 %	18/18	61 \pm 24 %	18/18
t_L	ND		42 \pm 19 d	14/18	32 \pm 20 d	17/18
t_{50}	ND		82 \pm 30 d	7/18	50 \pm 26 d	16/18
dt_{50}	ND		30 \pm 21 d	7/18	21 \pm 17 d	16/18

225 ND: not defined. R: replicate numbers. SD: standard deviation.

226

227 **Table S12.** Overview of 4-nitrophenol (4NP) degradation in the three test systems in respect to replicates.
 228 The mean biodegradation values recorded on day 28, 60 and 120 are stated. Lag phase (t_L), time to reach
 229 50% degradation (t_{50}) and dt_{50} ($t_{50}-t_L$) were only determined for the $mBST_{MR}$ and $imBST_{MR}$ tests. Cursive
 230 values state the number of 4NP replicates out of all performed 4NP replicates, which were used to calculate
 231 the respective benchmark criteria.

	OECD306 _{CB}		$mBST_{MR}$		$imBST_{MR}$	
	Mean ± SD	<i>R</i>	Mean ± SD	<i>R</i>	Mean ± SD	<i>R</i>
Day 28	3 ± 4 %	27/27	0 ± 1 %	20/20	6 ± 18 %	20/20
Day 60	8 ± 12 %	21/21	4 ± 13 %	20/20	21 ± 30 %	20/20
Day 120	ND		5 ± 13%	20/20	38 ± 36 %	20/20
t_L	ND		73 ± 38 d	3/20	53 ± 25 d	11/20
t_{50}	ND		39 d	1/20	56 ± 23 d	10/20
dt_{50}	ND		3 d	1/20	6 ± 3 d	10/20

232 ND: not defined. R: replicate numbers. SD: standard deviation.

233

234 **Table S13.** Overview of anionic polyacrylamide (APAM) degradation in the three test systems in respect
 235 to replicates. The mean biodegradation values recorded on day 28, 60 and 120 are stated. Lag phase (t_L),
 236 time to reach 50% degradation (t_{50}) and dt_{50} ($t_{50}-t_L$) were only determined for the $mBST_{MR}$ and $imBST_{MR}$
 237 tests. Cursive values state the number of APAM replicates out of all performed APAM replicates, which
 238 were used to calculate the respective benchmark criteria.

	OECD306 _{CB}		$mBST_{MR}$		$imBST_{MR}$	
	Mean ± SD	<i>R</i>	Mean ± SD	<i>R</i>	Mean ± SD	<i>R</i>
Day 28	9 ± 13 %	24/24	0 ± 0 %	12/12	3 ± 4 %	10/10
Day 60	10 ± 11 %	21/21	0 ± 1 %	12/12	6 ± 6 %	10/10
Day 120	ND		2 ± 2 %	12/12	8 ± 8 %	10/10
t_L	ND		ND	0/12	62 ± 30 d	5/10
t_{50}	ND		ND	0/12	ND	0/10
dt_{50}	ND		ND	0/12	ND	0/10

239 ND: not defined. R: replicate numbers. SD: standard deviation.

240

241 **Table S14.** Overview of pentachlorophenol (PCP) degradation in the three test systems in respect to
 242 replicates. The mean biodegradation values recorded on day 28, 60 and 120 are stated. Lag phase (t_L), time
 243 to reach 50% degradation (t_{50}) and dt_{50} ($t_{50}-t_L$) were only determined for the $mBST_{MR}$ and $imBST_{MR}$ tests.
 244 Cursive values state the number of PCP replicates out of all performed PCP replicates, which were used to
 245 calculate the respective benchmark criteria.

	OECD306 _{CB}		$mBST_{MR}$		$imBST_{MR}$	
	Mean ± SD	R	Mean ± SD	R	Mean ± SD	R
Day 28	1 ± 2 %	18/18	0 ± 0 %	24/24	1 ± 4 %	24/24
Day 60	13 ± 18 %	12/12	0 ± 0 %	24/24	3 ± 8 %	24/24
Day 120	ND		0 ± 0 %	24/24	6 ± 14 %	24/24
t_L	ND		ND	0/24	35 ± 29 d	6/24
t_{50}	ND		ND	0/24	ND	0/24
dt_{50}	ND		ND	0/24	ND	0/24

246 ND: not defined. R: replicate number. SD: standard deviation.

247
 248 **Table S15.** Chemical degradation of reference compounds in the three test systems in respect to replicates
 249 as evaluated against two regulatory persistence thresholds. Cursive brackets state the number of replicates
 250 out of all replicates where the reference compound degraded to pass the stated persistence criteria and
 251 classify as non-persistent.

	Current test: OECD306 _{CB}		Revised test: $mBST_{MR}$		New test: $imBST_{MR}$	
	Not persistent under OSPAR ^a	Not persistent under REACH ^b	Not persistent under OSPAR ^a	Not persistent under REACH ^b	Not persistent under OSPAR ^a	Not persistent under REACH ^b
SB	100% 27/27	100% 21/21	100% 22/22	95% 21/22	100% 26/26	100% 26/26
TEA	4% 1/26	11% 2/19	0% 0/18	11% 2/18	33% 6/18	50% 9/18
4NP	7% 2/27	0% 0/21	0% 0/21	0% 0/21	10% 2/20	15% 3/20
APAM	25% 6/24	0% 0/21	0% 0/12	0% 0/12	0% 0/10	0% 0/10
PCP	39% 7/18	0% 0/12	0% 0/24	0% 0/24	4% 1/24	0% 0/24

252 ^a OSPAR: Biodegradation ≥ 20% over 28 days = non-persistent; biodegradation < 20% over 28 days =
 253 persistent³⁴

254 ^b REACH: Biodegradation ≥ 60% over 60 days = non-persistent; biodegradation < 60% over 60 days =
 255 potentially persistent³⁵

256

257 **Table S16.** Test variation per chemical across tests described by the coefficient of variation.

	Current test: OECD306 _{CB}	Revised test: mBST _{MR}	New test: imBST _{MR}
SB	5%	11%	9%
TEA	55%	51%	25%
4NP	75%	69%	50%
APAM	57%	57%	36%
PCP	52%	21%	56%
Mean	49%	42%	35%
Mean excl. PCP	48%	47%	30%

258
259

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