

REGISTRATION REPORT

Part A

Risk Management

Product code: IR6141 A

Product name: FANTIC A

Active substances:

Benalaxyl-M, 50 g/kg

**Copper (copper oxychloride and copper hydroxide),
300 g/kg**

COUNTRY: FRANCE

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(new authorisation)

Applicant: ISAGRO S.P.A.

Date: 2018/12/11 (Decision)

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PART A – Risk Management

The company ISAGRO S.P.A. has requested marketing authorisation in France for the product FANTIC A (formulation code: IR6141 A), containing 50 g/kg benalaxyl-M, 300 g/kg copper (in the form of copper oxychloride and copper hydroxide), for use as a fungicide.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-7 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in Registration Report, Part B include assessment of further data or information as required at national registration by the EU peer review. It also includes assessment of data and information relating to FANTIC A (IR6141 A) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of FANTIC A (IR6141 A) have been made using endpoints agreed in the EU peer reviews of both benalaxyl-M and copper.

This document describes the specific conditions of use and labelling required for France for the registration of FANTIC A (IR6141 A).

Appendix 1 of this document provides a copy of the French Decision.

Appendix 2 of this document is a copy of the draft product label as proposed by the applicant.

Appendix 3 of this document is a copy of the letter(s) of Access.

1 DETAILS OF THE APPLICATION

1.1 Application background

The present registration report concerns the evaluation of ISAGRO S.P.A.'s application to market FANTIC A (IR6141 A) in France as a fungicide (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the first authorisation of this product in France and in other MSs of the Southern zone.

1.2 Active substance approval

Benalaxyl-M

Commission Implementing Regulation (EU) No 1175/2013 of 20 November 2013 approving the active substance benalaxyl-M, in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council concerning the placing of plant protection products on the market, and amending the Annex to Commission Implementing Regulation (EU) No 540/2011.

Specific provisions of Regulation (EU) No 1175/2013 were as follows :

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on benalaxyl-M, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 3 October 2013 shall be taken into account.

In this overall assessment Member States shall pay particular attention to:

- the protection of workers at re-entry,
- the risk to groundwater from the metabolites BM-M2 (N-(malonyl)-N-(2,6-xylyl)-DL-alanine) and BM-M3 (N-(malonyl)-N-(2,6-xylyl)-D-alanine), when the substance is applied in regions with vulnerable soil and/or climatic conditions.

Conditions of use shall include risk mitigation measures, where appropriate.

An EFSA conclusion is available (EFSA Journal 2013; 11(4): 3148).

A Review Report is available (SANCO/12079/2013 rev 1, 3 October 2013).

Copper compounds

Commission Implementing Regulation (EU) No 2015/232 of 13 February 2015 amending and correcting Implementing Regulation (EC) No 540/2011 as regards the conditions of approval of the active substance copper compounds.

Specific provisions of Regulation (EU) No 2015/232 were as follows:

PART A

Only uses as bactericide and fungicide may be authorised.

PART B

In assessing applications to authorise plant protection products containing copper for uses other than on tomatoes in greenhouses, Member States shall pay particular attention to the criteria in Article 4(3) of Regulation (EC) No 1107/2009, and shall ensure that any necessary data and information is provided before such an authorisation is granted.

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on copper compounds, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 23 January 2009 shall be taken into account.

In this overall assessment Member States must pay particular attention to:

- the specification of the technical material as commercially manufactured which must be confirmed and supported by appropriate analytical data. The test material used in the toxicity dossiers should be compared and verified against this specification of the technical material,
- the operator and worker safety and ensure that conditions of use prescribe the application of adequate personal protective equipment where appropriate,
- the protection of water and non-target organisms. In relation to these identified risks risk mitigation measures, such as buffer zones, should be applied where appropriate,
- the amount of active substance applied and ensure that the authorised amounts, in terms of rates and number of applications, are the minimum necessary to achieve the desired effects and do not cause any unacceptable effect on the environment taking into account background levels of copper at the application site.

The notifiers shall present to the Commission, the Authority and the Member States a monitoring programme for vulnerable areas where the contamination of the soil and water (including sediments) by copper is a concern or may become one.

That monitoring programme shall be submitted by 31 July 2015. The interim results of such monitoring programme shall be submitted as interim report to the Rapporteur Member State, the Commission and the Authority by 31 December 2016. Final results shall be submitted by 31 December 2017.

There is an EFSA Conclusion on the peer review of the pesticide risk assessment of the active substance (EFSA Scientific Report (2008) 187, 1-101), as amended (EFSA Journal 2013;11(6):3235).

There is also an EFSA conclusion on the peer review of the pesticide risk assessment of the active substance copper compounds Copper(I), copper(II) variants namely copper hydroxide, copper oxychloride, tribasic copper sulfate, copper(I) oxide, Bordeaux mixture, EFSA Journal 2018;16(1):5152 where risks were identified for environmental organisms on the representative uses in vineyard, cucurbits and tomato as well as for workers in vineyard.

A Review Report is available (SANCO/150/08 final, 26 May 2009, modified 10 October 2014).

1.3 Regulatory approach

The present application (2014-0088) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses) in the context of the zonal procedure for all Member States of the Southern zone, taking into account the worst-case uses (“risk envelope approach”)¹ – the highest application rates over the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

According to the French law and procedures, specific conditions of use are set out in the Decision letter.

¹ SANCO document “risk envelope approach”, European Commission (14 March 2011). Guidance document on the preparation and submission of dossiers for plant protection products according to the “risk envelope approach”; SANCO/11244/2011 rev. 5

The French Order of 4 May 2017² provides that:

- unless formally stated in the product authorisation, the pre harvest interval (PHI) is at least three days;
- unless formally stated in the product authorisation, the minimum buffer zone alongside a water body is five metres;
- unless formally stated in the product authorisation, the minimum re-entry period is six hours for field uses and eight hours for indoor uses.

Drift reduction measures such as low-drift nozzles are not considered within the decision-making process in France. However, drift buffer zones may be reduced under some circumstances as explained in Appendix 3 of the above-mentioned French Order.

The current document (RR) based on Anses's assessment of the application submitted for this product is in compliance with Regulation (EC) no 1107/2009³, implementing regulations, and French regulations.

The data taken into account are those deemed to be valid either at European Union level or at zonal/national level. This part A of the RR presents a summary of essential scientific points upon which recommendations are based and is not intended to show the assessment in detail.

The conclusions relating to the acceptability of risk are based on the criteria indicated in Regulation (EU) No 546/2011⁴, and are expressed as “acceptable” or “not acceptable” in accordance with those criteria.

Finally, the French Order of 26 March 2014⁵ provides that:

- an authorisation granted for a “reference” crop applies also for “linked” crops, unless formally stated in the Decision
- the “reference” and “linked” crops are defined in Appendix 1 of that French Order.

Thus, at French national level, possible extrapolation of submitted data and the corresponding assessment from “reference” crops to “linked” ones are undertaken even if not clearly requested by the applicant in their dRR, and a conclusion is reached on the acceptability of the intended uses on those “linked” crops. The aim of this Order, mainly based on the EU document on residue data extrapolation⁶ is to supply “minor” crops with registered plant protection products.

Therefore the GAP table (Section 2.3) and Decision may include uses on crops not originally requested by the applicant.

The Decision, as reproduced in Appendix 1, takes also into account national provisions, including national mitigation measures.

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of FANTIC A (IR6141 A), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

1.5 Letter(s) of Access

The applicant has provided letter(s) of access.

² Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjuvants visés à l'article L. 253-1 du code rural et de la pêche maritime <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRGI632554A/jo/texte>

³ REGULATION (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC

⁴ COMMISSION REGULATION (EU) No 546/2011 of 10 June 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards uniform principles for evaluation and authorisation of plant protection products

⁵ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGRGI407093A/jo>

⁶ SANCO document “guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/ 7525/VI/95 - rev.9


2 DETAILS OF THE AUTHORISATION

2.1 Product identity

Product name (code)	FANTIC A (IR6141 A)
Authorisation number	2180834
Function	Fungicide
Applicant	ISAGRO S.P.A.
Composition	50 g/kg benalaxyl-M 300 g/kg copper (in the form of copper oxychloride and copper hydroxide)
Formulation type (code)	Water-dispersible granule (WG)
Packaging	Polyester/aluminium/LDPE sacks (1 kg, 2 kg, 5 kg, 10 kg, 25 kg)

2.2 Classification and labelling

2.2.1 Classification and labelling in accordance with Regulation (EC) No1272/2008

Physical hazards	-	
Health hazards	Acute toxicity (oral), Hazard Category 4 Sensitisation — Skin, Hazard Category 1 Serious eye damage, Hazard Category 1 Acute toxicity (inhalational), Hazard Category 3	
Environmental hazards	Hazardous to the aquatic environment, Acute Hazard, Category 1 Hazardous to the aquatic environment, Chronic Hazard, Category 1	
Hazard pictograms		
Signal word	Danger	
Hazard statements	H302	Harmful if swallowed.
	H317	May cause an allergic skin reaction.
	H318	Causes serious eye damage.
	H331	Toxic if inhaled.
	H400	Very toxic to aquatic life.
	H410	Very toxic to aquatic life with long-lasting effects.
Precautionary statements –	<i>For the P phrases, refer to the extant legislation</i>	
Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008)	-	-

See Part C for justifications of the classification and labelling proposals.

2.2.2 Other phrases in compliance with Regulation (EU) No 547/2011

The authorisation of the preparation is linked for professional uses only to the following conditions:

SP 1	Do not contaminate water with the product or its container. Do not clean application equipment near surface water. Avoid contamination via drains from farmyards and roads.
SPe 1	To protect soil organisms, do not apply this product or any other product containing copper at an annual dose higher than 4 kg Cu/ha.
SPe 2	To protect groundwater, do not apply this product to grape before growth stage BBCH 53.
SPe 2	To protect groundwater, do not apply this product to tomato, aubergine, onion, shallot and garlic before growth stage BBCH 40.
SPe 3	To protect aquatic organisms, respect an unsprayed buffer zone of 50 metres ⁷ and a planted buffer strip of 20 metres to adjacent surface water bodies for use in vineyards.
SPe 3	To protect aquatic organisms, respect an unsprayed buffer zone of 20 metres and a planted buffer strip of 20 metres to adjacent surface water bodies for uses on tomato, aubergine, onion, garlic and shallot..
SPa 1	To avoid the development of resistance of <i>Plasmopara viticola</i> of grape, the number of applications is limited to two applications per crop cycle on grape. To manage the risk of resistance to phenylamide active substances, it is recommended to follow the limitations of use by chemical group recommended by the notes on resistance management on grapevine diseases ⁸ .

2.2.3 Other phrases linked to the preparation

Wear suitable personal protective equipment ⁹ : refer to the Decision in Appendix 1 for the details		
Re-entry period ¹⁰ : 48 hours		
Pre-harvest interval ¹¹ :	Wine grape	40 days
	Table grape	28 days
	Tomato, aubergine	3 days
	Onion, shallot and garlic	3 days
Other mitigation measures: -		
The label may include the following recommendations: - It should be mentioned on the label that FANTIC A (IR6141 A) can cause visual damage (spotting for applications after fruit set, BBCH 71) on grape berries and impact the wine-making process. The label must reflect the conditions of authorisation.		

⁷ The legal basis for this is **Titre III Article 12** of the French Order of 4 May 2017 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]

⁸ Note technique commune gestion de la résistance, maladies de la vigne : mildiou, oïdium, pourriture grise, available at http://draaf.centre-val-de-loire.agriculture.gouv.fr/IMG/pdf/Note_technique_commune_Vigne_2018_validee_cle4a83f9.pdf.

⁹ If a tractor with cab is used, wearing gloves during application is only required when working with the spray mixture

¹⁰ The legal basis for this is **Titre I Article 3** of the French Order of 4 May 2017 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]

¹¹ According to the French Order of 4 May 2017, PHI cannot be lower than 3 days unless specifically stated in the assessment and decision.

2.3 Product uses

Please note: The GAP Table below reports the intended uses proposed by the applicant, and possible extrapolation according to French Order of 26 March 2014 (highlighted in green), evaluated and concluded as safe uses by France as zRMS. Those uses are then granted in France.

When the conclusion is “not acceptable”, the intended use is highlighted in grey and the main reason(s) reported in the remarks.

When a use is “acceptable” with GAP restrictions, the modifications of the GAP are in bold.

GAP, date: 2018-12-11

PPP (product name/code): **FANTIC A (IR6141 A)**

Formulation type: **WG** ^(a, b)

Active substance 1: benalaxyl-M

Conc. of a.s. 1: **50g/kg** ^(c)

Active substance 2: copper (in the form of copper oxychloride and copper hydroxide)

Conc. of a.s. 2: **150 g/kg** ^(c)

Conc. of a.s. 3: **150 g/kg** ^(c)

Applicant: **ISAGRO S.P.A.**

Professional use: ☒

Zone(s): southern ^(d)

Non-professional use: ☐

Verified by MS: yes

Field of use: fungicide

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use- No. ^(e)	Member state(s)	Crop and/ or situation (crop destination / purpose of crop)	F, Fn, Fpn G, Gn, Gpn or I	Pests or Group of pests controlled (additionally: developmental stages of the pest or pest group)	Application				Application rate			PHI (days)	Remarks: e.g. g safener/synergist per ha (f)
					Method / Kind	Timing / Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	g a.s./ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
Zonal uses (field or outdoor uses, certain types of protected crops)													
1	France	Grape	F	<i>Plasmopara viticola</i>	foliar spray	BBCH 13/53-81	a) 3 b) 3	10	a) 2.4 b) 7.2	a) 120+360+360 b) 360+1080+1080	200- 1000	28	Not acceptable (groundwater, resistance)
1	France	Grape	F	<i>Plasmopara viticola</i>	foliar spray	BBCH 53-81	a) 2 b) 2	10	a) 2 b) 4	a)100+300+300 b)200+600+600	200- 1000	28 (wine grape) 40 (table grape)	Acceptable
2	France	Potato	F	<i>Phytophthora infestans</i>	foliar spray	BBCH 21-85	a) 3 b) 3	7	a) 2.4 b) 7.2	a)120+360+360 b)360+1080+1080	300- 1000	7	Not acceptable (MRL, groundwater, resistance)

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use- No. ^(e)	Member state(s)	Crop and/ or situation (crop destination / purpose of crop)	F, Fn, Fpn G, Gn, Gpn or I	Pests or Group of pests controlled (additionally: developmental stages of the pest or pest group)	Application				Application rate			PHI (days)	Remarks: e.g. g safener/synergist per ha ^(f)
					Method / Kind	Timing / Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	g a.s./ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
3	France	Tomato, aubergine	F	<i>Phytophthora infestans</i>	foliar spray	BBCH 17-85	a) 3 b) 3	7	a) 2.4 kg b) 7.2 kg	a)120+360+360 b)360+1080+10 80	300- 1000	3	Not acceptable (groundwater)
3	France	Tomato, aubergine	F	<i>Phytophthora infestans</i>	foliar spray	BBCH 40-85	a) 3 b) 3	7	a) 2.4 kg b) 7.2 kg	a)120+360+360 b)360+1080+10 80	300- 1000	3	Acceptable
4	France	Onion, garlic, shallot	F	<i>Peronospora destructor</i> , <i>Phytophthora porri</i>	foliar spray	BBCH 20-48	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	300- 1000	3	Not acceptable (groundwater)
4	France	Onion, garlic, shallot	F	<i>Peronospora destructor</i> , <i>Phytophthora porri</i>	foliar spray	BBCH 40-48	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	300- 1000	3	Acceptable
5	France	Leek	F	<i>Peronospora destructor</i> , <i>Phytophthora porri</i>	foliar spray	BBCH 20-48	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	300- 1000	3	Not acceptable (MRL, groundwater)
6	France	Spring onion	F	<i>Peronospora destructor</i>	foliar spray	BBCH 20-48	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	300- 1000	3	Not acceptable (MRL, groundwater)
7	France	Lettuce	F	<i>Bremia lactucae</i>	foliar spray	BBCH 12-49	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	200- 1000	7	Not acceptable (MRL, groundwater)
8	France	Cucurbits with non- edible peel	F	<i>Pseudoperonospora cubensis</i>	foliar spray	BBCH 15-85	a) 2 b) 2	7	a) 2.4 kg b) 4.8 kg	a)120+360+360 b)240+720+720	600- 1000	7	Not acceptable (MRL, groundwater)

Remarks table heading:

(a) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
 (b) Catalogue of pesticide formulation types and international coding system CropLife International Technical Monograph n°2, 6th Edition Revised May 2008
 (c) g/kg or g/L

(d) Select relevant
 (e) Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1
 (f) No authorisation possible for uses where the line is highlighted in grey, Use should be crossed out when the notifier no longer supports this use.

Remarks columns:	1	Numeration necessary to allow references	7	Growth stage at first and last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
	2	Use official codes/nomenclatures of EU Member States	8	The maximum number of application possible under practical conditions of use must be provided.
	3	For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure)	9	Minimum interval (in days) between applications of the same product
	4	F: professional field use, Fn: non-professional field use, Fpn: professional and non-professional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application	10	For specific uses other specifications might be possible, e.g.: g/m ³ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
	5	Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named.	11	The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g, kg or L product / ha).
	6	Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench	12	If water volume range depends on application equipments (e.g. ULVA or LVA) it should be mentioned under “application: method/kind”.
		Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.	13	PHI - minimum pre-harvest interval
			14	Remarks may include: Extent of use/economic importance/restrictions

3 RISK MANAGEMENT

3.1 Reasoned statement of the overall conclusions taken in accordance with the Uniform Principles

3.1.1 Physical and chemical properties

FANTIC A (IR6141 A) is a water-dispersible granule formulation. All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is that of pastel turquoise spherical granules, with characteristic odour. The formulation is not explosive and has no oxidising properties. It is not flammable and has a self-ignition temperature of 188.7 °C. In 1 % aqueous solution, it has a pH value of 8.52 at room temperature. There is no effect of high temperature on the stability of the formulation, since after 14 days at 54 °C, neither the active substances content nor the technical properties were changed. The formulation's technical characteristics are acceptable for a water-dispersible granule formulation.

The formulation is not classified for the physico-chemical aspect.

3.1.2 Methods of analysis

3.1.2.1 Analytical method for the formulation

Analytical methods for the determination of the active substances in the formulation are available and validated. As the active substance benalaxyl-M does not contain any relevant impurity, no analytical method is required on this matter. No analytical method for the determination of the relevant impurities (lead, arsenic, cadmium) of the active substances copper oxychloride and copper hydroxide has been submitted; this is required at the renewal of copper's approval.

In the study Mori, V. (2012) Report No. 036/2012, the analytical method developed for the determination of IR6141 in the formulation uses a non-chiral column, consequently the methodology cannot separate both isomers of benalaxyl, so specific method for the determination of benalaxyl-M in the formulation is required post registration.

3.1.2.2 Analytical methods for residues

Analytical methods are available in the Draft Assessment Report (DAR) and in this dossier, and are validated for the determination of residues of benalaxyl-M, copper oxychloride and copper hydroxide in plants, foodstuffs of animal origin, soil, water (surface and drinking) and air.

3.1.3 Mammalian Toxicology

Endpoints used in risk assessment:

Active Substance: benalaxyl-M			
ADI	0.04 mg/kg bw/d		EU (2014)
ARfD	Not applicable		
AOEL	0.06 mg/kg bw/d		
Dermal absorption	Based on default values according to guidance on dermal absorption (Efsa 2012):		
		Concentrate (used in formulation) 50 g/kg	Spray dilution (used in formulation) 0.12 g/L
	Dermal absorption endpoints %	25	75

Active Substance: copper compounds			
ADI	0.15 mg/kg bw/d		EU (2009)
ARfD	Not applicable		
AOEL	0.072 mg/kg bw/d		
Dermal absorption*	Based on an several <i>in vitro</i> human studies performed on several formulations containing copper under different forms:		
		Concentrate (tested)	Diluted formulation (tested) 0.33 g Cu/L
	<i>In vitro</i> (human) %	1	9
		Concentrate (used in formulation) 300 g/kg	Spray dilution (used in formulation) 0.72 g/L
	Dermal absorption endpoints %	1	9

* The dermal absorption values are those accepted after the peer review of copper compounds (EFSA Journal 2018;16(1):5152, 119 pp. doi:10.2903/j.efsa.2018.5152)

3.1.3.1 Acute Toxicity

FANTIC A (IR6141 A), containing 50 g/kg of benalaxyl-M and 300 g/kg of copper (as copper hydroxide and copper oxychloride), has a low acute dermal, inhalational and oral toxicity. It is not irritating to the rabbit skin but is irritating to the rabbit eye and is a skin sensitiser.

The classification proposed in accordance with Regulation (EC) No 1272/2008 is shown in Section 2.2.

3.1.3.2 Operator Exposure

Summary of critical use patterns (worst cases):

Scenarios	Crop (indoor/field)	Application rate (g a.s./ha)	Spray dilution (L/ha)	Application equipment	Number of applications
1	Potato, tomato, aubergine	120 benalaxyl-M / 720 copper	300-1000	Hydraulic tractor- mounted field crop sprayer	3
	Onion, garlic, shallot, spring onion, leek		300-1000		2
	Lettuce		200*-1000		
	Cucurbits with non- edible peel		600-1000		3
2	Grapes	120 benalaxyl-M / 720 copper	200-1000	Tractor-mounted, broadcast air-assisted sprayer	3
3	Grapes	120 benalaxyl-M / 720 copper	200-1000	Hand-held sprayer	3

* Worst case use for calculations.

Considering the proposed uses, operator systemic exposure was estimated using the German BBA model:

Crop	Equipment	PPE and/or working coverall	% AOEL benalaxyl-M	% AOEL copper
Scenario 1	Hydraulic tractor-mounted field crop sprayer	Working coverall and gloves during mixing/loading and application	13	10
Scenario 2	Tractor-mounted, broadcast air-assisted sprayer		39	26
Scenario 3	Hand-held sprayer	Working coverall and gloves during mixing/loading and application	19	15

According to the model calculations, it may be concluded that the risk for the operator using FANTIC A (IR6141 A) is acceptable with a working coverall (90 % protection factor) and gloves during mixing/loading and application.

For details of personal protective equipment for operators, refer to the Decision in Appendix 1.

3.1.3.3 Bystander Exposure

Bystander exposure was assessed according to EUROPOEM II. Exposure is estimated to be 9.6 % and 5.8 % of the AOEL of benalaxyl-M and copper respectively.

It may be concluded that there is no unacceptable risk to the bystander after incidental short-term exposure to FANTIC A (IR6141 A).

3.1.3.4 Worker Exposure

Workers may have to enter treated areas after treatment for crop inspection/harvesting activities. Therefore, estimation of worker exposure was calculated according to EUROPOEM II. Exposure is estimated to be 90 % and 55 % of the AOEL of benalaxyl-M and copper respectively.

It may be concluded that without taking into account a re-entry period, there is no unacceptable risk anticipated for workers wearing a working coverall and gloves, when re-entering crops treated with FANTIC A (IR6141 A).

For details of personal protective equipment for workers, refer to the Decision in Appendix 1.

3.1.4 Residues and Consumer Exposure

The data available are considered sufficient for risk assessment. Any exceedence of the current MRL for benalaxyl-M as laid down in Reg. (EU) n° 396/2005 is not expected on grapes, tomato, potato and onion. However, the number of residue trials is not sufficient to support the intended uses on lettuce, leek, spring onion (with the intended PHI of three days) and cucurbits with non-edible peel.

An exceedence of the current MRL for copper as laid down in Reg. (EU) n° 396/2005 is not expected on grapes, tomato, onion, lettuce and cucurbits with non-edible peel. However, an exceedence of the current MRL on leek, potato and spring onion is expected.

The chronic and short-term intakes of copper and benalaxyl-M residues are unlikely to present a public health concern.

As far as consumer health protection is concerned, France as zRMS agrees with the authorisation of the proposed uses.

According to the available data, no specific mitigation measures should apply.

Summary for benalaxyl-M

Crop	Plant metabolism covered?	Sufficient residue trials?	PHI sufficiently supported?	Sample storage covered by stability data?	MRL compliance Reg. (EU) No 520/2011	Chronic risk for consumers identified?	Acute risk for consumers identified?	Comments
Wine grape	Yes	Yes (8 SEU + 7 NEU)	Yes (with a PHI of 40 d instead of 28 d)	Yes	Yes	No	n.r.	Northern trials only support a PHI of 40 days
Table grape	Yes	Yes (9 SEU)	Yes	Yes	Yes		n.r.	
Tomato, aubergine	Yes	Yes (11)	Yes	Yes	Yes		n.r.	
Potato	Yes	Yes (3 SEU+ 3 NEU)	Yes	Yes	Yes		n.r.	Residue levels < LOQ
Onion, shallot, garlic	Yes	Yes (6 SEU+ 4 NEU)	Yes	Yes	Yes		n.r.	Residue levels < LOQ
Lettuce	Yes	No (3 SEU)	-	-	-		n.r.	
Leek	Yes	No (0)	-	-	-		n.r.	
Spring onion	Yes	Yes for SEU (2 NEU + 3 SEU)	Yes (for a PHI of 28 days instead of three days)	Yes	Yes		n.r.	Residue levels < LOQ but trials only support a PHI of 28 days instead of three days
Cucurbits with non-edible peel	Yes	No (3 SEU)	-	-	-		n.r.	

As residues of benalaxyl-M exceed the trigger values defined in Reg. (EU) No 283/2013, data on the nature of residue are required. Data on effects of processing on the amount of residue have been submitted on grape, and

processing factors have been defined. These processing factors are however considered as indicative only, as the nature of the residue after processing was not investigated.

Residues in succeeding crops have been sufficiently investigated taking into account the specific circumstances of the cGAP uses being considered here. It is very unlikely that residues will be present in succeeding crops.

Considering dietary burden and based on the intended uses, no significant modification of the intake was calculated for livestock. Further investigation of residues as well as the modification of MRLs in commodities of animal origin are therefore not necessary.

Summary for copper

Crop	Plant metabolism covered?	Sufficient residue trials?	PHI sufficiently supported?	Sample storage covered by stability data?	MRL compliance Reg. (EU) No 520/2011	Chronic risk for consumers identified?	Acute risk for consumers identified?	Comments
Wine	Yes	Yes (13 SEU + 13 NEU)	Yes	Yes	Yes	No	n.r.	
Table grape	Yes	Yes (13 SEU + 13 NEU)	Yes	Yes	Yes		n.r.	
Tomato, aubergine	Yes	Yes	Yes	Yes	Yes		n.r.	
Potato	Yes	Yes (9 SEU + 9 NEU)	Yes (for a PHI of 14 days instead of seven)	Yes	No		n.r.	
Onion, shallot, garlic	Yes	Yes (4 SEU + 8 NEU)	Yes	Yes	Yes		n.r.	
Lettuce	Yes	Yes (10 SEU + 8 Indoor)	Yes	Yes	Yes		n.r.	
Leek	Yes	No (4 SEU + 0 NEU)	Yes	Yes	No		n.r.	
Spring onion	Yes	No (0)	-	-	-		n.r.	
Cucurbits with non-edible peel	Yes	Yes (10 SEU)	Yes	Yes	Yes		n.r.	

Since copper is a mineral compound, there is no need to investigate the effects of industrial and/or household processing on the nature of the residue. Data on effect of processing on the amount of residue have been submitted; processing factors have been defined and considered to refine consumer risk assessment.

Residues in succeeding crops have not been investigated. However, copper occurs naturally in soils. Copper can be used applied as fertiliser, and is also added to soil when spreading sewage sludge, animal manure and urban compost as part of normal agricultural practice. Finally, copper is a contact fungicide/bactericide. As a result, studies for residues in succeeding crops are not relevant.

Considering dietary burden and based on the intended uses, modification of the intake was calculated for livestock. However, the maximum daily intake defined for copper as a feed additive according to the Regulation (EC) n°479/2006 (06/03/23)¹² is not exceeded. The extant MRLs in foodstuffs of animal origin are not always compliant

¹² COMMISSION REGULATION (EC) No 479/2006 of 23 March 2006 as regards the authorisation of certain additives belonging to the group compounds of trace elements

with the level of copper that can be reached in animal tissues. However, MRLs have been reviewed in the frame of Article 12.

Chronic consumer exposure resulting from copper background in all food commodities and from water was calculated according to the EFSA PRIMo (rev2) model. Considering uses of copper as plant protection products, chronic exposure remains acceptable for all groups of consumers (maximum 77.54 % of the ADI for WHO cluster B).

Summary for FANTIC A (IR6141 A)

Crop	PHI for FANTIC A (IR6141 A) requested by applicant	PHI/withholding period* sufficiently supported for		PHI for FANTIC A (IR6141 A) proposed by zRMS	zRMS Comments (if different PHI proposed)
		Benalaxyl-M	Copper		
Wine grape	28	No	Yes	40	Trials with benalaxyl-M only support a 40-day PHI in northern Europe
Table grape	28	Yes	Yes	28	
Tomato, aubergine	3	Yes	Yes	3	
Onion (except spring onion), shallot, garlic	3	Yes	Yes	3	

* Purpose of withholding period to be specified

Waiting periods before planting succeeding crops: not relevant.

3.1.5 Environmental fate and behaviour

The fate and behaviour in the environment of the formulation has been evaluated according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review were used to calculate predicted environmental concentration (PEC) values for the active substances for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

The PEC values of copper, benalaxyl-M and its metabolites in soil, surface water and groundwater have been assessed according to FOCUS guidance documents, with standard FOCUS scenarios to obtain outputs from the FOCUS models, and the endpoints established in the EU conclusions or agreed in the assessment based on new data provided.

PEC_{SOIL} and PEC_{SW} values derived for both active substances and its metabolites are used for the ecotoxicological risk assessment and mitigation measures are proposed.

PEC_{GW} values for benalaxyl-M and its metabolites do not occur at levels exceeding those mentioned in Regulation (EC) No 1107/2009 and guidance document SANCO 221/2000 on the relevance of metabolites in groundwater when the following restrictions are applied for the intended uses. Therefore, no unacceptable risk of groundwater contamination is expected when the following restrictions are applied for the intended uses:

Individual crop	Proposed restriction BBCH
Grapes	53-81
Potatoes	40-85
Tomatoes, aubergines	40-85
Cucurbits with non-edible peel	40-85
Onions, garlics, shallots, leeks	40-48
Spring onions	
Lettuce	40-49

Compared with the natural background occurrence for copper, no unacceptable risk of groundwater contamination is expected for the intended uses.

Based on the compounds properties, no significant contamination of the air compartment is expected for the intended uses.

3.1.6 Ecotoxicology

The intended uses of FANTIC A (IR6141 A) lead to acceptable risks for all organisms. Mitigation measures are required to protect aquatic organisms, as the risk is led by copper (see SPe phrases and GAP table above).

3.1.7 Efficacy

Considering the data submitted:

- The efficacy level of FANTIC A (IR6141 A) is considered acceptable for the uses on leek and onion.
- The efficacy of FANTIC A (IR6141 A) is considered satisfactory for the uses on tomato, potato, lettuce, melon and grape. Nevertheless, because of the absence of significant gain in efficacy level when the preparation is applied at a rate of 2.4 kg/ha compared with the rate of 2 kg/ha for the control of downy mildew on grape, it would be appropriate to reduce the proposed rate from 2.4 kg/ha to 2 kg/ha for this use.
- The phytotoxicity level of FANTIC A (IR6141 A) is considered acceptable for all the requested uses.
- The risks of negative impact of FANTIC A (IR6141 A) on yield, propagating purposes, adjacent and succeeding crops are considered to be negligible.
Risks with copper such as spotting on table grape berries or on the wine-making process are known. However, these risks of negative impact are considered acceptable.
- The risk of resistance developing or appearing to copper does not require monitoring for the requested uses.
- There is a risk of resistance developing or appearing to benalaxyl-M for late blight in potato (*Phytophthora infestans*), requiring monitoring of resistance. On downy mildew in grapevine (*Plasmopara viticola*), the most important issue is to demonstrate if benalaxyl-M, in the context of widespread resistance, still has efficacy in the ready-mix product FANTIC A (IR6141 A) (comparing FANTIC A (IR6141 A) and straight-copper products applied at the same rate as FANTIC A (IR6141 A)).

3.2 Conclusions arising from French assessment

Taking into account the above assessment, an authorisation can be granted on grape, tomato, aubergine, onion, shallot and garlic as proposed in Appendix 1 – Copy of the product Decision.

An authorisation cannot be granted on potato, lettuce, leek, spring onion and cucurbits with non-edible peel, as proposed in Appendix 1 – Copy of the product Decision.

3.3 Substances of concern for national monitoring

No information stated.

3.4 Further information to permit a decision to be made or to support a review of the conditions and restrictions associated with the authorisation

3.4.1 Post-authorisation monitoring

Given the context of the resistance of *Plasmopara viticola* on grapevine to benalaxyl-M, characterised by high and stable resistance frequencies, the most important issue is to demonstrate if benalaxyl-M, in this context, still has an efficacy in the ready-mix product FANTIC A (IR6141 A) (by comparing FANTIC A (IR6141 A) with straight-copper products applied at the same rate as FANTIC A (IR6141 A) and if possible with a benalaxyl-M-only product).

Any new information which would change the resistance risk analysis should be provided to Anses (France) immediately. The data and results should in all cases be provided for the renewal of the product's authorisation.

3.4.2 Post-authorisation data requirements

The French Decision requests the submission of post-authorisation confirmatory pieces of information within 24 months regarding:

- A specific method for the determination of benalaxyl-M in the formulation.
- For benalaxyl-M, an additional residue trial to support the use on wine grape (to confirm MRL compliance).

3.4.3 Label amendments

The draft label proposed by the applicant in Appendix 2 may be corrected with consideration of any new element under points 2.2.1 (or 2.2.2), 2.2.3 and 2.2.4.

The label shall reflect the detailed conditions stipulated in the Decision.

Appendix 1 – Copy of the French Decision



Décision relative à une demande d'autorisation de mise sur le marché d'un produit phytopharmaceutique

Vu les dispositions du règlement (CE) N° 1107/2009 du 21 octobre 2009 et de ses textes d'application,

Vu le code rural et de la pêche maritime, notamment le chapitre III du titre V du livre II des parties législative et réglementaire,

*Vu la demande d'autorisation de mise sur le marché du produit phytopharmaceutique **FANTIC A***

de la société ISAGRO SPA

enregistrée sous le n°2014-0088

Vu les conclusions de l'évaluation de l'Anses du 27 novembre 2018,

La mise sur le marché du produit phytopharmaceutique désigné ci-après **est autorisée** en France pour les usages et dans les conditions précisés dans la présente décision et ses annexes.

La présente décision s'applique sans préjudice des autres dispositions applicables.

Avertissement :

Le non-respect des conditions décrites ci-dessous peut entraîner le retrait ou la modification de l'autorisation ainsi que toute action incluant des poursuites judiciaires.



Informations générales sur le produit	
Nom du produit	FANTIC A
Type de produit	Produit de référence
Titulaire	ISAGRO SPA Centro Uffici San Siro - Edificio D - Ala 3 Via Caldera, 21 20153 MILAN ITALIE
Formulation	Granulé dispersable (WG)
Contenant	300 g/kg – cuivre (sous forme d'oxychlorure de cuivre et d'hydroxyde de cuivre) 50 g/kg - béalaxyl-M
Numéro d'intrant	9631-2014.01
Numéro d'AMM	2180834
Fonction	Fongicide
Gamme d'usage	Professionnel

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active qui arrivera à échéance le plus tôt. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 janvier 2020.

Le dépôt d'une demande de renouvellement conformément à l'article 43 du règlement (CE) 1107/2009, dans les trois mois suivant le renouvellement de l'approbation de la substance active, prolonge de plein droit l'autorisation de mise sur le marché après son arrivée à échéance de la durée nécessaire pour mener à bien l'examen et adopter une décision sur le renouvellement.

La présente décision peut être retirée ou modifiée avant cette échéance si des éléments le justifient.

A Maisons-Alfort le,

11 DEC. 2018

Françoise WEBER
Directrice générale déléguée
en charge du pôle produits réglementés
Agence nationale de sécurité sanitaire de
l'alimentation, de l'environnement et du travail (ANSES)



ANNEXE I : Modalités d'autorisation du produit

Vente et distribution	
Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages :	
Emballage	Contenance
Sacs en polyester / aluminium / polyéthylène basse densité	1 kg ; 2 kg ; 5 kg ; 10 kg ; 25 kg

Classification du produit	
La classification retenue est la suivante :	
Catégorie de danger	Mention de danger
Toxicité aiguë par voie orale - Catégorie 4	H302 : Nocif en cas d'ingestion
Sensibilisants cutanés - Catégorie 1 sous-catégorie B	H317 : Peut provoquer une allergie cutanée
Lésions oculaires graves et irritation oculaire - Catégorie 1	H318 : Provoque des lésions oculaires graves
Toxicité aiguë par inhalation - Catégorie 3	H331 : Toxique par inhalation
Dangers pour le milieu aquatique - Danger aigu, catégorie 1	H400 : Très toxique pour les organismes aquatiques
Dangers pour le milieu aquatique - Danger chronique, catégorie 1	H410 : Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme
Pour les phrases P se référer à la réglementation en vigueur.	
Le titulaire de l'autorisation est responsable de la mise à jour de la fiche de données de sécurité et de la classification du produit en tenant compte de ses éventuelles évolutions.	



Liste des usages autorisés En l'absence de mention spécifique, les usages autorisés correspondent à une utilisation en plein champ. En l'absence de restriction, les usages sont autorisés sur l'ensemble des cultures de la portée de l'usage.									
Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles	
16803201 Oignon*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha	2/an	entre les stades BBCH 40 et BBCH 48	3	20 (dont DVP 20)	-	-	-	
	Intervalle minimum entre les applications : 7 jours. Modification du stade minimum d'application de BBCH 20 à BBCH 40 en raison d'un risque inacceptable de contamination des eaux souterraines.								
16953201 Tomate*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha	3/an	entre les stades BBCH 40 et BBCH 85	3	20 (dont DVP 20)	-	-	-	
	Intervalle minimum entre les applications : 7 jours. Modification du stade minimum d'application de BBCH 17 à BBCH 40 en raison d'un risque inacceptable de contamination des eaux souterraines.								
12703203 Vigne*Trt Part.Aer.*Mildiou(s)	2 kg/ha	2/an	entre les stades BBCH 53 et BBCH 81	40	50 (dont DVP 20)	-	-	-	
	Uniquement sur raisin de cuve. Intervalle minimum entre les applications : 10 jours. Modification de la dose maximale d'emploi de 2,4 kg/ha à 2 kg/ha et du nombre d'applications de 3/an à 2/an en raison d'une absence de gain significatif en efficacité et de la situation de résistance vis-à-vis du bénomyl-M. Non autorisé au stade d'application BBCH 13 en raison d'un risque inacceptable de contamination des eaux souterraines. Modification du délai avant récolte de 28 jours à 40 jours conformément aux essais résidus disponibles.								

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Liste des usages autorisés

En l'absence de mention spécifique, les usages autorisés correspondent à une utilisation en plein champ.
En l'absence de restriction, les usages sont autorisés sur l'ensemble des cultures de la portée de l'usage.

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles
12703203 Vigne*Trt Part.Aer.*Mildiou(s)	2 kg/ha	2/an	entre les stades BBCH 53 et BBCH 81	28	50 (dont DVP 20)	-	-	-

Uniquement sur raisin de table.

Intervalle minimum entre les applications : 10 jours.

Modification de la dose maximale d'emploi de 2,4 kg/ha à 2 kg/ha et du nombre d'applications de 3/an à 2/an en raison d'une absence de gain significatif en efficacité et de la situation de résistance vis-à-vis du bénomyl-M.

Non autorisé au stade d'application BBCH 13 en raison d'un risque inacceptable de contamination des eaux souterraines.

DVP : Dispositif Végétalisé Permanent.

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Liste des usages refusés			
Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
16603207 Laitue*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha Motivation du refus : L'usage est refusé en raison d'un manque d'essais résidus ne permettant pas d'exclure un risque de dépassement des limites maximales de résidus en bénalaxyl-M et d'un risque inacceptable de contamination des eaux souterraines pour certains stades d'application.	2/an	7
16753208 Melon*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha Motivation du refus : L'usage est refusé en raison d'un manque d'essais résidus ne permettant pas d'exclure un risque de dépassement des limites maximales de résidus en bénalaxyl-M et d'un risque inacceptable de contamination des eaux souterraines pour certains stades d'application.	2/an	7
00516002 Melon*Trt Part.Aer.*Stimul. Déf. naturelles	2,4 kg/ha Motivation du refus : L'usage est refusé puisque jugé non pertinent pour ce type de produit. L'usage est également refusé en raison d'un manque d'essais résidus ne permettant pas d'exclure un risque de dépassement des limites maximales de résidus en bénalaxyl-M et d'un risque inacceptable de contamination des eaux souterraines pour certains stades d'application.	2/an	7
16843201 Poireau*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha Motivation du refus : L'usage est refusé en raison d'un manque d'essais résidus ne permettant pas d'exclure un risque de dépassement des limites maximales de résidus en bénalaxyl-M et en cuivre, et d'un risque inacceptable de contamination des eaux souterraines pour certains stades d'application.	2/an	3
15653201 Pomme de terre*Trt Part.Aer.*Mildiou(s)	2,4 kg/ha Motivation du refus : L'usage est refusé en raison d'un risque de dépassement des limites maximales de résidus en cuivre, d'un risque inacceptable de contamination des eaux souterraines pour certains stades d'application et de la situation de résistance vis-à-vis du bénalaxyl-M.	3/an	7

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Conditions d'emploi du produit

Protection de l'opérateur et du travailleur

Des informations générales relatives aux bonnes pratiques de protection pourront être mises à disposition de l'utilisateur :

- l'utilisation d'un matériel adapté et entretenu et la mise en œuvre de protections collectives constituent la première mesure de prévention contre les risques professionnels, avant la mise en place de protections individuelles ;
- le port de combinaison de travail dédiée ou d'EPI doit être associé à des réflexes d'hygiène (ex : lavage des mains, douche en fin de traitement) et à un comportement rigoureux (ex : procédure d'habillage/déshabillage) ;
- les modalités de nettoyage et de stockage des combinaisons de travail et des EPI réutilisables doivent être conformes à leur notice d'utilisation.

Pour l'opérateur, porter

Dans le cadre d'une application effectuée à l'aide d'un pulvérisateur pneumatique (ou atomiseur)

• pendant le mélange/chargement

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée ;
- Protections respiratoires certifiées : demi-masque certifié (EN 140) équipé d'un filtre P3 (EN143) ou A2P3 (EN 14387) ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3) ;

• pendant l'application - pulvérisation vers le haut

Si application avec tracteur avec cabine

- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation. Dans ce cas, les gants ne doivent être portés qu'à l'extérieur de la cabine et doivent être stockés après utilisation à l'extérieur de la cabine ;

Si application avec tracteur sans cabine

- Combinaison de protection de catégorie III type 4 avec capuche ;
- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation ;

• pendant le nettoyage du matériel de pulvérisation

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée ;

Dans le cadre d'une application effectuée à l'aide d'un pulvérisateur à rampe

• pendant le mélange/chargement

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée ;



- Protections respiratoires certifiées : demi-masque certifié (EN 140) équipé d'un filtre P3 (EN143) ou A2P3 (EN 14387) ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3) ;

• pendant l'application

Si application avec tracteur avec cabine

- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation. Dans ce cas, les gants ne doivent être portés qu'à l'extérieur de la cabine et doivent être stockés après utilisation à l'extérieur de la cabine ;

Si application avec tracteur sans cabine

- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation ;

• pendant le nettoyage du matériel de pulvérisation

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée.

Pour le travailleur, porter

- Combinaison de travail (cotte en coton/polyester 35 %/65 % - grammage d'au moins 230 g/m²) avec traitement déperlant et, en cas de contact avec la culture traitée, des gants en nitrile certifiés EN 374-3.

Délai de rentrée en application de l'arrêté du 4 mai 2017 :

- 48 heures.

Respect des limites maximales de résidus (LMR)

Pour chaque usage figurant dans la liste des usages autorisés, les conditions d'utilisation du produit permettent de respecter les limites maximales de résidus.

Protection de l'environnement (milieux, faune et flore)

Protection de l'eau

- SP 1 : Ne pas polluer l'eau avec le produit ou son emballage. Ne pas nettoyer le matériel d'application près des eaux de surface. Éviter la contamination via les systèmes d'évacuation des eaux à partir des cours de ferme ou des routes.
- SPe 2 : Pour protéger les eaux souterraines, ne pas appliquer ce produit avant le stade BBCH 53 pour l'usage sur « vigne ».
- SPe 2 : Pour protéger les eaux souterraines, ne pas appliquer ce produit avant le stade BBCH 40 pour les usages sur « tomate » et « oignon ».



Protection de la faune

- SPe 1 : Pour protéger les organismes du sol, ne pas appliquer ce produit ou tout autre produit contenant du cuivre à une dose annuelle totale supérieure à 4 kg Cu/ha.

- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 50 mètres comportant un dispositif végétalisé permanent non traité d'une largeur de 20 mètres en bordure des points d'eau pour l'usage sur « vigne ».

- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 20 mètres comportant un dispositif végétalisé permanent non traité d'une largeur de 20 mètres en bordure des points d'eau pour les usages sur « tomate » et « oignon ».

Gestion des résistances

- Spa 1 : Pour éviter le développement de résistance du mildiou à la substance bénomyl-M, le nombre d'applications du produit est limité à 2 applications par campagne sur « vigne ».

Afin de gérer au mieux les risques de résistance, il est recommandé de suivre les limitations d'emploi par groupe chimique préconisées par la note technique commune relative à la gestion de la résistance des maladies de la vigne.

Exigences complémentaires post-autorisation

A défaut de transmission de ces données dans les délais impartis à compter de la date de la présente décision, la présente décision pourra être retirée ou modifiée.

Détail de la demande post autorisation	Délai (mois)	Récurrence (mois)
Fournir une nouvelle méthode pour la détermination de la substance active bénomyl-M dans le produit.	24	-
Fournir les résultats d'un essai sur raisins de cuve afin de confirmer le respect des limites maximales de résidus en bénomyl-M.	24	-
Mettre en place des essais d'efficacité en situation de résistance caractérisée au bénomyl-M pour le mildiou de la vigne, en comparant le produit avec des produits à base de cuivre seul et de bénomyl-M seul. Fournir, aux autorités compétentes, toute nouvelle information susceptible de modifier l'analyse du risque de résistance.	-	-

Recommandations relatives à l'étiquette du produit

Il est recommandé de faire figurer l'information suivante sur l'étiquette :

- Risque de marquage du raisin de table dans le cas d'applications après le stade BBCH 71.
- Risque d'impact sur le processus de vinification.

Appendix 2 – Copy of the draft product label as proposed by the applicant

FANTIC A WG

FONGICIDE SYSTÉMIQUE ET DE CONTACT INDICÉ POUR PROTÉGER LA VIGNE ET LES CULTURES DE POMMES DE TERRE, TOMATES, AUBERGINES, CUCURBITACÉES À PEAU NON COMESTIBLE, LAITUES, OIGNONS, CIBOULES, ÉCHALOTES, AILS, POIREAUX CONTRE LA PÉRONOSPORA (MILDIU)

FORMULATION : GRANULES HYDROSOLUBLES

5% w/w Bénéalaxyl-M 15 % w/w d'oxychlorure de cuivre et 15% w/w d'hydroxyde de cuivre

Distribué par:

Produit par:



CARACTERISTIQUES

FANTIC A WG contient 5% de Bénéalaxyl-M, 15% d'oxychlorure de cuivre et 15% d'hydroxyde de cuivre.

Le Bénéalaxyl-M est un fongicide systémique pouvant être utilisé pour protéger différentes cultures contre les maladies provoquées par différentes espèces de champignons de la famille des phycomycètes. Deux sels de cuivre agissant par contact viennent compléter la formule afin de fournir une protection à large spectre contre l'action pathogène de champignons et de bactéries. FANTIC A WG est un produit qui permet de lutter activement contre la péronospora (mildiou); grâce à son action systémique et persistante, il assure une excellente protection de toutes les parties vertes de la plante. Son action PREVENTIVE à la surface des plantes est associée à une action CURATIVE interne.

Suspendre les traitements selon les indications ci-après: vigne, ciboules : 28 jours, pommes de terre, laitues, cucurbitacées à croûte non comestible : 7 jours; tomates, aubergines, oignons, échalotes, ail et poireaux: 3 jours.

Dangereux pour les organismes aquatiques.

DOSES ET MODES D'UTILISATION

FANTIC A WG est un produit de traitement foliaire indiqué pour protéger les cultures ci-après contre la péronospora (mildiou).

VIGNE

Péronospora (*Plasmopara viticola*), dose 2-2,4 kg/ha

Application préventive: commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie, à partir du développement du feuillage / de l'inflorescence (BBCH 15/53) jusqu'au début de la maturation (BBCH 81). Si nécessaire, modifier l'intervalle d'application de 10 à 14 jours en fonction de l'impact de la maladie.

POMME DE TERRE

Péronospora (*Phytophthora infestans*), dose 2-2,4 kg/ha

Commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie et, quoi qu'il en soit, jamais après le début de la fermeture des rangs (BBCH 31). Commencer à traiter indépendamment du stade phénologique en cas de risque phytosanitaire avéré. Poursuivre les traitements à intervalle de 7 à 15 jours en fonction des conditions climatiques et du stade phénologique de la culture.

TOMATE/AUBERGINE

Péronospora (*Phytophthora infestans*), dose 2-2,4 kg/ha

Commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie et, quoi qu'il en soit, jamais au-delà du début de la floraison (BBCH 61). Poursuivre le traitement à intervalle de 7 à 14 jours en fonction des conditions climatiques et du stade phénologique de la culture.

LAITUE

Péronospora (*Bremia lactucae*), dose 2-2,4 kg/ha

Commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie. Ne jamais appliquer avant la deuxième feuille (BBCH 12). Les applications successives devront être effectuées à intervalle de 7 à 14 jours en fonction du développement de la maladie.

CUCURBITACES APEAU NON COMESTIBLE (MELON, PASTÈQUE, COURGE)

Péronospora (*Pseudoperonospora cubensis*) dose 2-2,4 kg/ha

Commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie et, quoi qu'il en soit, jamais après le début de la floraison (BBCH 61).

OIGNON/CIBOULE/ECHALOTE/AIL/POIREAU

Péronospora (*Peronospora destructor*, *Phytophthora porri*), dose 2-2,4 kg/ha.

Commencer le traitement lorsque les conditions s'avèrent favorables au développement de la maladie. Poursuivre le traitement à intervalle de 7 à 14 jours en fonction du développement de la maladie.

AVERTISSEMENTS D'ORDRE GENERAL A PROPOS DE L'UTILISATION DU PRODUIT

Eviter de préparer une quantité de mélange supérieure à la dose nécessaire pour une application immédiate. Verser le produit dans le réservoir à moitié rempli d'eau, après avoir activé le brasseur. Le cas échéant verser les autres produits et veiller à ce qu'ils soient bien dissous. Compléter avec la quantité d'eau nécessaire pour remplir complètement le réservoir. La quantité d'eau nécessaire par hectare varie en fonction du stade de croissance de la culture et du matériel utilisé. Appliquer le mélange au plus tard 2 heures après sa préparation. Veiller à répartir le produit de façon uniforme en faisant en sorte que toutes les plantes à traiter bénéficient du traitement moyennant un mouillage complet.

Appendix 3 – Letter(s) of Access

Provided upon request.