# REGISTRATION REPORT Part A Risk Management

**Product code: 1 38014 00** 

**Product name: COMPLEXUGEC** 

**Chemical active substances:** 

2,4-D, 275 g/L MCPA, 275 g/L

(as the dimethylamine salts)

Southern Zone
Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE (Authorisation renewal according to Art. 43)

**Applicant: PHYTEUROP** 

Date: 22/07/2025

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#### **zRMS NOTE**

To comply with the provisions of Regulation (EC) No 1107/2009 (Commission Implementing Regulation (EU) 2015/2033) and according to Art. 43 of Regulation (EC) No 1107/2009, and in accordance with the guidance document SANCO/2010/13170, the risk assessment conclusions only apply for the active substance 2,4-D following its renewal of approval.

# PART A RISK MANAGEMENT

#### 1 Details of the application

The company PHYTEUROP has requested renewal of marketing authorisation in France for the product COMPLEXUGEC (formulation code: 1 38014 00), containing 275 g/L 2,4-D and 275 g/L MCPA, as a herbicide for professional uses.

The risk assessment conclusions provided in this document are based on the information, data and assessments provided in the Registration Report, Part B Sections 1-10 and Part C, and where appropriate the addendum for France. The information, data and assessments provided in the Registration Report, Part B include assessment of further data or information as required at national registration by EU regulations. It also includes assessment of data and information related to COMPLEXUGEC (1 38014 00) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of COMPLEXUGEC (1 38014 00) have been made using endpoints agreed in the EU peer reviews of 2,4-D.

This document describes the specific conditions of use and labelling required for France for the registration of COMPLEXUGEC  $(1\ 38014\ 00)$ .

Appendix 1 of this document provides a copy of the product authorisation.

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

Appendix 3 of this document contains a copy of the Letter(s) of Access.

#### 1.1 Application background

The present registration report concerns the evaluation of PHYTEUROP's application to renew marketing authorisation of COMPLEXUGEC (1 38014 00) in France as a herbicide (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 renewal of authorisation after approval of the active substance 2,4-D of this product in France and in other MSs of the Southern zone.

The present application (2016-1295 and 2022-2946) 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")<sup>1</sup> – the highest application rates applied for in the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

The current document (RR) based on Anses's assessment of the application submitted for this product is in compliance with Regulation (EC) no 1107/2009<sup>2</sup>, 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

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

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

are based and is not intended to show the assessment in detail.

The conclusions on the acceptability of risk are based on the criteria provided in Regulation (EU) No 546/2011<sup>3</sup>, and are expressed as "acceptable" or "not acceptable" in accordance with those criteria.

#### 1.2 Letters of Access

The applicant has provided letters of access for the active substances.

#### 1.3 Justification for submission of tests and studies

According to the applicant: "Studies are submitted in accordance with Regulation 545/2011 and current Guidelines".

#### 1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of COMPLEXUGEC (1 38014 00), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

#### 2 Details of the authorisation decision

#### 2.1 Product identity

Product code 1 38014 00. Product name in MS COMPLEXUGEC. Authorisation number 6600501. Low risk (article 47) No. Function Herbicide. PHYTEUROP. **Applicant** Active substance(s) 2,4-D, 275 g/L. (incl. content) MCPA, 275 g/L. Formulation type Soluble concentrate [SL]. Packaging Container in HDPE (10 L). Professional. Coformulants of concern for national authorisations Restrictions related to identity Mandatory tank mixtures None. None. Recommended tank mixtures

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

#### 2.2 Conclusion

The evaluation of the application for COMPLEXUGEC (1 38014 00) resulted in the decision **to grant** continued authorisation.

#### 2.3 Substances of concern for national monitoring

Refer to 5.1.1.

#### 2.4 Classification and labelling

#### 2.4.1 Classification and labelling under Regulation (EC) No 1272/2008

The following classification is proposed in accordance with Regulation (EC) No 1272/2008:

Hazard class(es), categories:  Acute toxicity (oral), category 4.  Acute toxicity (inhalation) category 4.  Serious eye damage, category 1.  Hazardous to the aquatic environment - Chronic Hazard, category 2.					
Hazard pictograms:	GHS05 GHS07 GHS09				
Signal word: Danger.					
Hazard statement(s):	H302: Harmful if swallowed. H318: Causes serious eye damage. H332: Harmful if inhaled. H411: Toxic to aquatic life with long-lasting effects.				
Precautionary statement(s):	For the P phrases, refer to the existing legislation				
Additional labelling phrases:	To avoid risks to man and the environment, comply with the instructions for use [EUH401].				
	Contains 2,4-D. May produce an allergic reaction [EUH208].				

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

#### 2.4.2 Standard phrases under Regulation (EU) No 547/2011

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).
For other restrictions refer to 2.5.

### 2.4.3 Other phrases (according to Article 65 (3) of the Regulation (EU) No 1107/2009)

None.

#### 2.5 Risk management

According to the French law and procedures, specific conditions of use are set out in the Decision letter. The French Order of 4 May 2017<sup>4</sup> provides that:

- unless otherwise stated in the product authorisation, the pre harvest interval (PHI) is at least 3 days;
- unless otherwise stated in the product authorisation, the minimum buffer zone alongside a water body is 5 metres;
- unless otherwise stated in the product authorisation, the minimum re-entry period is 6 hours for field uses and 8 hours for indoor uses.

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

Finally, the French Order of 26 March 2014<sup>5</sup> 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 "related" ones are undertaken even if not clearly requested by the applicant in their dRR, and a conclusion is also reached on the acceptability of the intended uses on those "related" crops. The aim of this Order, mainly based on the EU document on residue data extrapolation<sup>6</sup> 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.

#### 2.5.1 Restrictions linked to the PPP

The authorisation of the PPP is linked to the following conditions:

Operator protection:							
- Refer to the Decision in Appendix 1 for the details.							
Worker protection:	Worker protection:						
- Refer to the Decision in Appendix 1 for the details.							
Bystander and resident protection							

<sup>&</sup>lt;sup>4</sup> 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 modifié par l'arrêté du 27 décembre 2019 : <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte">https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</

http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGRG1407093A/jo

<sup>&</sup>lt;sup>6</sup> SANCO document "guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs": SANCO/7525/VI/95 - rev.9

-	Respect an unsprayed zone of 10 meters from the extremity of the boom and: - areas where bystanders are present during treatment - areas where residents could be present at least 50% drift reduction equipment should be used.				
Integrated pest manage	ment (IPM)/sustainable use:				
	-				
Environmental protecti	on:				
SPe 3	To protect aquatic organisms, respect an unsprayed buffer zone of 5 metres to non-agricultural land/surface water bodies.				
SPe 3	To protect non-target plants, respect an unsprayed buffer zone of 5 metres to non-agricultural land.				
Other specific restrictions:					
Re-entry period:	24 hours.				

### 2.5.2 Specific restrictions linked to the intended uses

Some of the authorised uses are linked to the following conditions in addition to those listed under point 2.5.1 (mandatory labelling):

None.

#### 2.6 Intended uses (only NATIONAL GAP)

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" or "not finalised", 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.

Use should be crossed out when the applicant no longer supports this use.

GAP rev. 1, date: 2025-07-22 COMPLEXUGEC / 1 38014 00 Formulation type: Soluble concentrate (SL) (a, b)

Active substance 1: 2,4-D Conc. of a.s. 1:  $275 \text{ g/L}^{(c)}$  Active substance 2: MCPA Conc. of a.s. 2:  $275 \text{ g/L}^{(c)}$ 

 Applicant:
 PHYTEUROP
 Professional use:
 ∑

 Zone(s):
 Southern Zone (d)
 Non-professional use:
 □

Verified by MS: Yes

PPP (product name/code):

Field of use: herbicide

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1	2	3	4	5	6	7	8	9	10	11	12	13	14
					Application			Application rate			PHI	Remarks:	
No. (e)	state(s)	or situation (crop destination/purpose of crop)	Fn, Fpn G, Gn, Gpn or I	controlled  (additionally: developmental stages of	Method/Ki nd	Timing/Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	L 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/ma x	(days)	e.g. g safener/synergist per ha (f)
Zona	l uses (field	l or outdoor uses, c	ertain 1	types of protected crops)	)								
1	FR	Winter wheat (TRZAW), winter barley (HORVW), rye (SECCE), triticale (TTLSO, TTLWI), spelt (TRZSP)	F	Weeds (dicotyledonous, post-emergence)	Foliar spray	BBCH 21- <b>32</b>	a) 1 b) 1	n/a	a) 1.5 b) 1.5	412.5 g 2,4-D/ha + 412.5 g MCPA/ha	100- 300	F	Acceptable
2	FR	Spring wheat (TRZAS), spring barley (HORVS)	F	Weeds (dicotyledonous, post-emergence)	Foliar spray	BBCH 21- <b>32</b>	a) 1 b) 1	n/a	a) 1.3 b) 1.3	357.5 g 2,4-D/ha + 357.5 g MCPA/ha	100- 300	F	Acceptable

Remarks table heading:

- (a) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
  - ) 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

Remarks columns:

- 1 Numeration necessary to allow references
- 2 Use official codes/nomenclatures of EU Member States
- 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)
- 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
- 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.
- Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants type of equipment used must be indicated.

- (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.
- 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
- 8 The maximum number of application possible under practical conditions of use must be provided.
- 9 Minimum interval (in days) between applications of the same product
- For specific uses other specifications might be possible, e.g.: g/m³ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
- The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g, kg or L product/ha).
- 12 If water volume range depends on application equipments (e.g. ULVA or LVA) it should be mentioned under "application: method/kind".
- 13 PHI minimum pre-harvest interval
- 14 Remarks may include: Extent of use/economic importance/restrictions

### 3 Background of authorisation decision and risk management

#### 3.1 Physical and chemical properties (Part B, Section 2)

COMPLEXUGEC (1 38014 00) is soluble concentrate (SL). All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is a homogeneous amber-yellow limpid liquid, with a strong odour. It is not explosive and has no oxidising properties. The product is not flammable and has a flash point of up to  $131\,^{\circ}$ C. It is not considered autoflammable. It has a pH value of 6.76 at 20.5  $^{\circ}$ C. There is no effect of low and high temperatures on the stability of the formulation, since after seven days at 0  $^{\circ}$ C and 14 days at 54  $^{\circ}$ C, neither the active substances' content nor the technical properties were changed. The stability data indicate a shelf life of at least two years at ambient temperature when stored in HDPE packaging. The technical characteristics are acceptable for an SL formulation.

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

The stability of the dilution at the maximum in-use concentration (1.5 % v/v) is missing and is required post-authorisation.

#### 3.2 Efficacy (Part B, Section 3)

#### 3.2.1 Efficacy data

Considering the data submitted:

- The efficacy level of COMPLEXUGEC (1 38014 00) is considered satisfactory for all the requested uses.
- The selectivity level of COMPLEXUGEC (1 38014 00) is considered satisfactory for all the requested uses.
- The risks of negative impact on yield, quality, transformation processes, propagation, succeeding and adjacent crops are considered negligible.
- There is a risk of resistance developing or appearing to 2,4-D and MCPA for poppy in cereal crops, which requires monitoring. Resistance monitoring should be put in place.

#### 3.3 Methods of analysis (Part B, Section 5)

Analytical methodology for the determination of the active substances in the formulation is available and validated.

The relevant impurities of the active substance 2,4-D (dioxins and furans expressed as TCDD equivalent toxic < 10 ppb) cannot be formed during the production and storage of the product. The contents of relevant impurities are below the specifications in the active substance. The analytical methods for the determination

of these impurities in the technical active substance are validated. However, no analytical method for the determination of these relevant impurities has been submitted and confirmation of the applicability of the method for the technical a.s. to the product is therefore required post-authorisation.

#### **2,4-D:**

Analytical methods are available in the Draft Renewal Assessment Report (DRAR) and validated for the determination of residues of 2,4-D in plants (dry-content commodities), foodstuffs of animal origin, soil, water (surface and drinking) and air.

According to the EFSA conclusions, the validation of the methods provided in the DRAR of 2,4-D with regard to extraction efficiency and validation of the hydrolysis step are lacking, therefore a data gap has been identified and should be filled.

An analytical method is available in the DRAR and validated for the determination of residues of 2,4-D in tissues and body fluids.

#### MCPA:

Analytical methods are available in the Draft Assessment Report and in this dossier and validated for the determination of residues of MCPA in plants (dried plants), foodstuffs of animal origin, soil, water (surface and drinking) and air.

#### 3.4 Mammalian toxicology (Part B, Section 6)

Active substance: 2,4-D								
ADI	0.02 mg/kg bw/d							
ARfD	0.3 mg/kg bw		EU (2017)					
AOEL	0.02 mg/kg bw/d							
Dermal absorption	The formulation 600 g 2,4-D DMA/L SL and the formulation 1 38014 00 are not considered to be similar according to the guidance on dermal absorption of EFSA 2012 (due to an important variation of surfactants between the two formulations). The extrapolation is not considered acceptable. The values used for the assessment are default values (25 % for concentrate and 75 % for spray dilution)							
		Spray dilution (COMPLEXUGEC) 1.19 g ae/L						
	Dermal absorption endpoints %	75						
Active substance:	MCPA							
ADI	0.05 mg/kg bw/d							
ARfD	0.15 mg/kg bw	EU (2006)						
AOEL	0.04 mg/kg bw/d							
Dermal absorption	No dermal absorption study has been provided. According to guidance on dermal absorption (Efsa 2012), the values used for the assessment are:							

	Concentrate	Spray dilution
Dermal absorption endpoints %	25	75

#### 3.4.1 Acute toxicity

COMPLEXUGEC (1 38014 00), containing 275 g/L 2,4-D and 275 g/L MCPA, has low acute oral, inhalational and dermal toxicity, is not irritating to the rabbit skin and is not a skin sensitiser. It is irritating to the rabbit eye.

#### 3.4.2 Operator exposure

Summary of critical use patterns (worst cases):

Crop	F/G <sup>7</sup>	Equipment	Application rate in L product/ha (g a.s./ha)	Spray dilution (L/ha)	Model
Winter wheat	F	Tractor-	1.5 L product/ha	100-300	EFSA
(TRZAW),		mounted			
Winter barley			(412.5 g 2,4-D/ha)		
(HORVW), rye			(412.5 g MCPA/ha)		
(SECCE),					
triticale (TTLSO,					
TTL-WI), spelt					
(TRZSP)					
(BBCH 21-39)					

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

Crop	Equipment	PPE and/or working coverall	% AOEL 2,4-D	% AOEL MCPA
Cereals	Tractor- mounted	Working coverall and gloves during mixing/loading and application	58	28.8

According to the model calculations, it may be concluded that the risk for the operator using COMPLEXUGEC (1 38014 00) is acceptable with a working coverall (90 % protection factor) and gloves during mixing/loading and application.

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Open field or glasshouse

#### 3.4.3 Worker exposure

Application rate: 412.5 g a.s./ha (winter wheat)

Workers may have to enter treated areas after treatment for crop inspection activities. Therefore, estimation of worker exposure was calculated according to the EFSA model. Exposure is estimated to be 217 % of the AOEL of 2,4-D.

Application rate:357.5 g a.s./ha (spring wheat)

Workers may have to enter treated areas after treatment for crop inspection activities. Therefore, estimation of worker exposure was calculated according to the EFSA model. Exposure is estimated to be 188 % of the AOEL of 2,4-D.

It may be concluded that without taking into account a re-entry period, there is an unacceptable risk anticipated for workers wearing a working coverall and gloves, when re-entering crops treated with COMPLEXUGEC (1 38014 00) at an application rate of 357.5 g a.s./ha (spring wheat).

It may be concluded that without taking into account a re-entry period, there is an unacceptable risk anticipated for workers wearing a working coverall and gloves, when re-entering crops treated with COMPLEXUGEC (1 38014 00) at an application rate of 412.5 g MCPA/ha (winter wheat)

#### 3.4.4 Bystander and resident exposure

Considering that there is no acute AOEL assessed for active substances MCPA and 2,4-D, bystander exposure may be considered to be covered by that for resident exposure.

Residential exposure was assessed according to the EFSA model. Exposure is estimated to be 243 % (child) and 112 % (adult) of the AOEL of 2,4-D (considering spring wheat: 357.5 g a.s./ha drift reduction and buffer strip 10 metres<sup>8</sup>).

It may be concluded that there is an unacceptable risk to the resident exposed to COMPLEXUGEC (1 38014 00). Applying a buffer zone of 10 metres around the treated area as a risk mitigation measure does not change the conclusions of the risk assessment.

It may be concluded that there is thus an unacceptable risk to the bystander after incidental short-term exposure to COMPLEXUGEC (1 38014 00).

#### 3.5 Residues and consumer exposure (Part B, Section 7)

The data available are considered sufficient for risk assessment. No exceedence of the current MRLs of 0.05 mg/kg (barley and oat), 2 mg/kg (rye and wheat) for 2,4-D and 0.2 mg/kg (all crops considered in the dossier) for MCPA as laid down in Reg. (EU) 396/2005 is expected.

The chronic and short-term intakes of 2,4-D and MCPA residues are unlikely to present a public health concern. As far as consumer health protection is concerned, France agrees with continued authorisation of the intended uses.

<sup>&</sup>lt;sup>8</sup> Exposure estimation incorporates a distance of 10 metres from the spray boom and drift reduction (EFSA Journal 2014;12(10):3874)

#### **Summary of the evaluation**

The preparation 1 38014 00 (COMPLEXUGEC) contains 2,4-D and MCPA.

#### Toxicological reference values for the dietary risk assessment of 2,4-D and MCPA

Reference value	Source	Year	Value	Study relied upon	Safety factor			
2,4-D - Parent co	2,4-D - Parent compound							
ADI	EFSA	2014	0.05 mg/kg/day	2-year studies (mouse and rat)	100			
ARfD	EFSA	2014	0.75 mg/kg/day	Acute neurotoxicity, (rat)	100			
MCPA - Parent o	MCPA - Parent compound							
ADI	EC	2008	0.05 mg/kg bw/day	2 years, rat	100			
ARfD	EC	2005	0.15 mg/kg bw	Teratogenesis, rabbit	100			

It should be noted that toxicological reference values of 2,4-D have been recently revised at EU level in the light of the further consideration by the peer review experts of studies common to the evaluation of the active substances 2,4-D and 2,4-DB (of which 2,4-D in its turn is a major metabolite). Consequently it was decided to apply the toxicological reference values derived for 2,4-DB to 2,4-D (Standing Committee on Plants, Animals, Food and Feed, 6 October 2017).

Overview of the new toxicological reference values for 2,4-D:

	Source	Year	Value	Study relied upon	Safety factor
2,4-D					
ADI	EU	2017	0.02 mg/kg bw/d	Dog, 1-year (supported by rat, 2-year and 2- generation reproductive toxicity studies)	100
ARfD	EU	2017	0.3 mg/kg bw	Acute neurotoxicity study in rats	100

#### **Summary for 2,4-D**

Use- No.*	Crop	Plant metabolism covered?	Sufficient residue trials?	PHI sufficiently supported?	Sample storage covered by stabil- ity data?	MRL compliance	Chronic risk for consumers identified?	Acute risk for con- sumers identified?
1	Winter wheat, winter barley	Yes	Yes	Yes (BBCH 32 instead of	Yes	Yes	No	No
2	Spring wheat		Yes	39)				

<sup>\*</sup> Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1

#### **Summary for MCPA**

Use- No.*	Crop	Plant metabolism covered?	Sufficient residue trials?	PHI sufficiently supported?	Sample storage covered by stabil- ity data?	MRL compliance	Chronic risk for consumers identified?	Acute risk for con- sumers identified?
1	Winter wheat, winter barley	Yes	Yes	V	Vac	V	No	No
2	Spring wheat, spring wheat		Yes	Yes	Yes	Yes	No	No

<sup>\*</sup> Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1

The effects of processing on the nature of 2,4-D and MCPA residues have been investigated. Data on effects of processing on the amount of residue have been submitted. These data were not considered for risk assessment.

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 13801400 (COMPLEXUGEC)

#### Information on COMPLEXUGEC (1 38014 00) (KCA 6.8)

Crop	PHI for COMPLEX- UGEC	0.1	iod* sufficiently sup- ed for	PHI for COM- PLEXUGEC	zRMS Comments
	(1 38014 00) requested by applicant	2,4-D	МСРА	(1 38014 00) proposed by zRMS	(if different PHI proposed)
Cereals	F (application at BBCH 21-39)	Yes	Yes	F (application at BBCH 21-32)	No residue trials performed with application at BBCH 39.

NR: not relevant

#### 3.6 Environmental fate and behaviour (Part B, Section 8)

The fate and behaviour in the environment have been evaluated according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU conclusions were used to calculate predicted environmental concentration (PEC) values for the active substance 2,4-D and its metabolites 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.

In order to comply with the provisions of Regulation (EC) No 1107/2009 (Commission Implementing Regulation (EU) 2015/2033) and according to Art. 43 of Regulation (EC) No 1107/2009, and in accordance with the guidance document SANCO/2010/13170, this risk assessment report for the sections "Fate and behaviour in the Environment/Ecotoxicology" only applies for the active substance 2,4-D following its renewal of approval. For other active substance, provisions of the initial authorisation remain.

The PEC values of 2,4-D 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.

PECsoil and PECsw values derived for the active substance 2,4-D and its metabolites are used for the ecotoxicological risk assessment.

PECgw values for 2,4-D and its metabolite do not occur at levels exceeding those mentioned in Regulation (EC) No 1107/2009 and guidance document SANCO 221/20009.

During the peer review a data gap on the soil degradation for soils having a soil pH $_{\rm H2O}$  < 6.0 was identified in the EFSA review report (2014). As no further data were provided by the applicant to address the EFSA data gap concerning the behaviour of 2,4-D in acidic soils, FOCUS modelling cannot be extrapolated for soils having a soil pH $_{\rm H2O}$  < 6.0. Therefore, a restriction measure is proposed: Do not apply the active substance 2,4-D to acidic soils having a soil pH $_{\rm H2O}$  < 6.

<sup>\*</sup> Purpose of withholding period to be specified

<sup>\*\*</sup> F: PHI is defined by the application stage at last treatment (time elapsing between last treatment and harvest of the crop).

<sup>&</sup>lt;sup>9</sup> Guidance document on the assessment of the relevance of metabolites in groundwater of substances regulated under Council directive 91/414/EEC. Sanco/221/2000-rev10-final, 25 February 2003.

It should be noted that at French national level, a letter of access to a new study (Crabtree, 2015) showing that no pH-dependency of soil DT<sub>50</sub> values for 2,4-D exists, has been provided by the applicant after the commenting period. As a consequence, the PECgw value can be used for all soil conditions. At the French national level, no restriction is proposed.

Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses.

Based on vapour pressure, information on volatilisation from plants and soil, and DT<sub>50</sub> calculation, no significant contamination of the air compartment is expected for the intended uses.

#### 3.7 Ecotoxicology (Part B, Section 9)

To comply with the provisions of Regulation (EC) No 1107/2009 (Commission Implementing Regulation (EU) 2015/2033) and according to Art. 43 of Regulation (EC) No 1107/2009, and in accordance with the guidance document SANCO/2010/13170, this risk assessment report for the section "Ecotoxicology" only applies for the active substance 2,4-D following its renewal of approval. For the other active substance, provisions of the initial authorisation remain.

The ecotoxicological risk assessment of the formulation was performed according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review for active substances and their metabolites were used 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.

Based on the guidance documents, the risks for birds, mammals, aquatic organisms, bees and other non-target arthropods, earthworms and other soil macro- and micro-organisms and non-target plants are acceptable for the intended uses when mitigation measures are considered (refer to section 2.5.1).

The ongoing tests with the product COMPLEXUGEC (1 38014 00) on seedling emergence and vegetative vigour should be provided, together with an update of the risk assessment for non-target plants.

#### 3.8 Relevance of metabolites (Part B, Section 10)

Not relevant.

## 4 Conclusion of the national comparative assessment (Art. 50 of Regulation (EC) No 1107/2009)

The actives substances 2,4-D and MCPA are not approved as a candidate for substitution, therefore a comparative assessment is not foreseen.

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

When the conclusions of the assessment is "Not acceptable", please refer to relevant summary under point 3

#### **5.1.1** Post-authorisation monitoring

A monitoring of resistance to 2,4-D and MCPA should be put in place on poppy. Any new information which would change the resistance risk analysis should immediately be provided to Anses (France). In all cases a report on the results of the monitoring put in place should be provided at the time of the renewal of COMPLEXUGEC (1 38014 00)'s authorisation.

#### 5.1.2 Post-authorisation data requirements

The following data would have been required to update the dossier:

- The stability of the dilution at the maximum use concentration (1.5 % v/v).
- Confirmation of the applicability to the product of the analytical method for the determination of the relevant impurities, dioxins and furans, expressed as TCDD equivalent toxic (< 10 ppb) in the active substance 2,4-D (technical).
- Data for extraction efficiency and validation of the hydrolysis with regard to the animal and plant analytical methods of 2,4-D.
- The ongoing tests with the product COMPLEXUGEC (1 38014 00) on seedling emergence and vegetative vigour, together with an update of the risk assessment for non-target plants.

<sup>&</sup>quot;Background of authorisation decision and risk management".

#### **Appendix 1** Copy of the product authorisation

Docusign Envelope ID: C51FA574-0E62-47EC-AEC0-CF95F693697D





# Décision relative à une demande de renouvellement de l'autorisation de mise sur le marché d'un produit phytopharmaceutique et à la demande associée

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 règlementaire,

Vu les demandes de renouvellement de l'autorisation de mise sur le marché, suite au renouvellement de l'approbation de la substance active 2,4-D, et de modification des conditions d'autorisation du produit phytopharmaceutique **COMPLEXUGEC** 

de la société PHYTEUROP

enregistrées sous les n° 2016-1295 et 2022-2946

Vu les conclusions de l'évaluation de l'Anses du 19 octobre 2020 et du 3 février 2025,

L'autorisation de mise sur le marché du produit phytopharmaceutique désigné ci-après **est renouvelée** en France, sous réserve du respect de la composition du produit autorisée dans les conclusions de l'évaluation, pour les usages et dans les conditions précisés dans la présente décision et son annexe.

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.

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Informations générales su	r le produit
Nom du produit	COMPLEXUGEC
Type de produit	Produit de référence
Titulaire	PHYTEUROP 83 avenue de la Grande Armée 75016 PARIS France
Formulation	Concentré soluble (SL)
Contenant	275 g/L - 2,4-D (sous forme de sel de diméthylamine) 275 g/L - MCPA (sous forme de sel de diméthylamine)
Numéro d'intrant	6600501
Numéro d'AMM	6600501
Fonction	Herbicide
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 15 août 2027.

Le dépôt d'une demande de renouvellement conformément à l'article 43 du règlement (CE) n° 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 22/07/2025

Docusigned by: Charlotte Grastilleur AE281A955A42454...

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

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#### ANNEXE : 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					
Bidons en polyéthylène haute densité	10 L				

Mention de danger						
H302 : Nocif en cas d'ingestion						
H318 : Provoque des lésions oculaires graves						
H332 : Nocif par inhalation						
H411 : Toxique pour les organismes aquatiques entraîne des effets à long terme						
allergique						
Pour les phrases P se référer à la règlementation en vigueur.						

la classification du produit en tenant compte de ses éventuelles évolutions

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#### 1 38014 00/COMPLEXUGEC Part A - National Assessment FRANCE DEPR version

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#### Liste des usages autorisés

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)	Culture attractive en floraison (arrêté du 20/11/2021)		
	1,5 L/ha	1/an	entre les stades BBCH 21 et BBCH 32	F (BBCH 32)	5	5	-	non concerné		
15105912		ur céréales d'hiver stade limite d'appl	· lication de BBCH 39 á	BBCH 32 en c	ohérence avec les	données résidus d	isponibles.			
Blé*Désherbage	1,3 L/ha	1/an	entre les stades BBCH 21 et BBCH 32	F (BBCH 32)	5	5	-	non concerné		
		Uniquement sur céréales de printemps.  Diminution du stade limite d'application de BBCH 39 à BBCH 32 en cohérence avec les données résidus disponibles.								
	1,3 L/ha	1/an	entre les stades BBCH 21 et BBCH 32	F (BBCH 32)	5	5	-	non concerné		
15105913		Uniquement sur orge de printemps.  Diminution du stade limite d'application de BBCH 39 à BBCH 32 en cohérence avec les données résidus disponibles.								
Orge*Désherbage	1,5 L/ha	1/an	entre les stades BBCH 21 et BBCH 32	F (BBCH 32)	5	5	-	non concerné		
		Uniquement sur orge d'hiver.  Diminution du stade limite d'application de BBCH 39 à BBCH 32 en cohérence avec les données résidus disponibles.								
15105915 Seigle*Désherbage	1,5 L/ha	1/an	entre les stades BBCH 21 et BBCH 32	F (BBCH 32)	5	5	-	non concerné		
5	Diminution du	stade limite d'app	lication de BBCH 39 à	BBCH 32 en c	ohérence avec les	données résidus d	isponibles.			

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#### Conditions d'emploi du produit

#### Protection de l'opérateur et du travailleur

- Il convient au demandeur de se conformer à la norme applicable sur les EPI de type vestimentaire (EN ISO 27065). 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 à rampe

#### • pendant le mélange/chargement

- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus l'EPI vestimentaire précité ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3) ;

#### pendant l'application

Si application avec tracteur avec cabine

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1;
- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN ISO 374-2 (types A, B ou C) 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

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1;
- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN ISO 374-2 (types A, B ou C) 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 NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 :
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus l'EPI vestimentaire précité.

#### Pour le travailleur, porter

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 et, en cas de contact avec la culture traitée, des gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A).

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

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- 24 heures.



#### Protection des personnes présentes et des résidents (au sens du règlement (UE) n° 284/2013)

Respecter une distance d'au moins 3 mètres entre la rampe de pulvérisation et :

- l'espace fréquenté par les personnes présentes lors du traitement ;
- l'espace susceptible d'être fréquenté par des résidents.

#### 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.

#### Protection de la faune

- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 5 mètres par rapport aux points d'eau.

#### Protection de la flore

 SPe 3 : Pour protéger les plantes non cibles, respecter une zone non traitée de 5 mètres par rapport à la zone non cultivée adjacente.

#### 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 les études sur l'émergence et la vigueur végétative des plantes non cibles réalisées avec le produit ainsi qu'une mise à jour de l'évaluation des risques pour ces organismes.	24	-
Poursuivre le suivi de la résistance au 2,4-D. Fournir, aux autorités compétentes, toute nouvelle information susceptible de modifier l'analyse du risque de résistance.	-	-
Poursuivre le suivi de la résistance au MCPA. Fournir, aux autorités compétentes, toute nouvelle information susceptible de modifier l'analyse du risque de résistance.	-	-
Fournir des données sur la phase d'hydrolyse et le rendement d'extraction pour les méthodes d'analyses du 2,4-D dans les matrices animale et végétale.	24	-

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#### Copy of the product label Appendix 2

The draft product label as proposed by the applicant is reported below. The draft label may be corrected with consideration of any new element. The label shall reflect the detailed conditions stipulated in the Decision.

#### Complexugec NOM COMMERCIAL: COMPLEXUGEO 6600501 N° D'AMM: DETENTEUR DE L'AMM: TYPE D'ACTION: FORMULATION: COMPOSITION: Phyteurop (55 rue Raspail , 92300 Levallois-Perret CEDEX) Herbicide (HRAC: 0) Concentré soluble (5L) 275 g/l (24,44 %) 2,4-MCPA (sel de dimethylamine) 275 g/l (24,95 %) 2,4-D (sel de dimethylamine)

	Usages homologués	Doses	DAR	Max. apport	Stade d'application	ZNT
	Blé*Désherbage					
ı	Orge*Désherbage	Cultures de printemps : 1,3 Vha			De la fin du tallage	
	Seigle*Désherbage	Cultures d'hiver :1,5 l/ha	F*	1	au début de la montaison	5 m
-	,					

- L'utilisation de ce produit sur ses usages autorisés n'est recommendée que sur les cultures et cibles indiquées dans l'étiquette ci-dessous. PHYTEUROP décline en conséquence toute responsabilité en cas d'utilisation du produit sur des cultures ou pour des cibles non recommendées.
   L'imites maximales de résidus : se reporter aux LMR définies au niveau de l'Union Européenne, consultables à l'adresse : http://ec.curpop.eu/senco\_pesticides/public/index.dm.
- Les mélanges doivent être mis en œuvre conformément à la réglementation en vigueur.
- Délai de re trée : 24 heures.
- lication et/ou le cycle de croissance de la culture (>120 jours) permettent de respecter les LMR applicables.

COMPLEXUGEC, absorbé par le système foliaire, se déplace à l'intérieur de la plante et agit même sur les organes souterrains, si bien qu'il est actif à la fois sur les plantes annuelles jeunes ou développées et sur les espèces vivaces. Il agit essentiellement sur les mauvaises herbes présentes lors du traitment. Préfèrer une intervention à un state jeune des adventices.
COMPLEXUGEC, association de maléres actives complémentaires, est un herbicide antidicotyfédones à large champ d'action.
COMPLEXUGEC présente une efficacité satisfaisante sur : bleuet, capselle, chardons, chénopode, liserons, moutante des champs, revenelle, renoncule des champs, bouvet des champs.
Son efficacité est moyenne sur : amarante, amoche, coquelicol, mouron rouge, myosofis, renouée des oiseaux, renouée liseron, séneçon, vénorique à feuille de lierre, vénorique de Perse.

#### Périodes et doses d'emploi

Trailer en période de croissance active des mauvaises herbes, par temps doux.

COMPLEXUSEC est actif à partir de 10-12 °C. Ne pas braiter au-dessus de 25°C. Ne pas traiter par temps pluvieux, l'efficacité étant d'iminuée par une pluie suverennt moins de 5 heures après l'application. Eviler but braitement par temps hoid ou sur des cultures en mauvais état végétait.

Céragles, Récommandés un blês, seigles, orget, triticales et éperautre.

Respectez la doise de 1,3 lha pour les cultures de printemps et 1,5 lha pour les cultures d'hiver.

Trailer de la fin du tallage au début montaison. Des applications plus précoces peuvent être loxiques pour la céréale et elles peuvent, en outre, provoquer des déformations d'épis qui sont un inconvénient en production de semences.

Ne pas traiter au delà du stade 2 nœuds de la céréale.

#### Préparation

- ATTENTION DANGER POUR LES CULTURES VOISINES, RESPECTER STRICTEMENT LE MODE D'EMPLOI.
- ATTENTION DANGER POUR LES CULTURES VOISINES. RESPECTER STRICTEMENT LE MODE D'EMPLO.

  Porter un appareit de protection des yeux et du visage approprié pendant loutes les phases d'utilisation du produit.

  Sous l'influence de certains facteurs (situation, vent, température, etc.) Les homones herbicides risquent de provoquer au voisinage de la zone d'application du traitement des dégâts sur les cultures sensibles (vigne, arbres fruitiers, cultures légumières et omementales, pépinières, lin, colta, houresot, labose, légumineures, pommes de terre de plant, etc.).

  Il faut donc éviter l'entrainement du produit, en prenant les précautions suivantées:

   Employer un apparet à pression de l'aquide à jet projeté.

   Prétière le plat aux autres formes de jets.

   Régler la houteur de la rampe le plus près possible de la position assurant une pulvérisation régulière sur la culture.

   Toutes nos avécutions deuror d'été d'autont plus soincreusement respectées que la culture pensible sen proche de la culture braite et de l'aux des

- neger in neueru œ is rampe le plus pres possible de la position assurant une pulvéritation réguliére sur le culture.
   Toules ces pécaulions dévont être d'autant plus soigneusement respectiées que la culture sensible sera proche de la culture braitée et de l'axe des vents dominants à l'époque du traitement.
   Il convient, par ailleurs, de nethoyer très soigneusement et de rincer les pulvérisatieurs aussitét après le traitement. Dans toute la mesure du possible, il est préférable de réserver un apparet uniquement pour les braitements de déschrébage.
   Toujours conserver les produits dans leur emballage d'origine. Les stocker dans un local réservé à cet usage, frais, sec, bien ventilé et fermant à clé, à l'abn'd ugle et de la chaleur.
   Réservé à un usage professionnel.

- Reserve à un wags produit et de l'emballage :
  Pour l'élimination des produits non utilisables, faire appel à une entreprise habilitée pour la collecte et l'élimination des produits dangereux.

  Réemploi de l'emballage interdit. Lors de l'utilisation du produit, bien vider et rincer le bidon en veillant à verser l'eau de rincage dans la cuve du pulvérisateur. Eliminer les emballages vides via les collectes organisées par les distributeurs partenaires de la filière ADIVALOR.

  Eliminer les fonds de cuve conformément à la réglementation en vigueur.

IMPORTANT: Respectez les usages, doses, conditions el précautions d'emploi mentionnés sur l'emballage qui ont été déteminés en fonction des caractéristiques du produit et des applications pour lesquelles il est pércoiné. Conduiser sur ces bases, la culture et les trattements selon la bonne pretique agricole en terent compte, sous les voix en esponsables, de bus les fracteurs perfoules contenent votre exploitation lettes que les précules contenent votre exploitation lettes que le précultation métérologiques perfoules contenent votre exploitation lettes que le précultation dans leur emballage de direit de la conformité de la conf



Ne pas manger, boire ou fumer en manipulant ce produit. Éviter le rejet dans l'environnement.

Porter des gants de protection/des vêtements de protection/un

pement de protection des yeux/ du visage. EN CAS D'INGESTION: appeler immédiatement un CENTRE ANTIPOISON ou un médecin.

P305+P351+P338 EN CAS DE CONTACT AVEC LES YEUX: rincer avec précaution à l'eau pendant plusieurs minutes. Enlever les lentilles de contact si la victime en porte et si elles peuvent être facilement enlevées.

SP1 Ne pas polluer l'eau avec le produit ou son emballage. [Ne pas nettoyer le iel d'application près des eaux de surface. Éviter la contam via les systèmes d'évacuation des eaux à partir des cours de ferme ou des routes.]

de 5 mètres par rapport aux points d'eau.

SPe 3 Pour protéger les plantes non-cibles, respectez une zone non traitée de

20 métres par rapport à la zone non cultivée adjacente Pour protéger les arthropodes non-cibles, respectez une zone non traitée de 5 mètres par rapport à la zone non cultivée adjacente

EUH 401 Respectez les instructions d'utilisation pour éviter les risques pour la santé humaine et l'environnement.

Distribué par : PHYTEUROP - 55, rue Raspail - 92300 Levallois-Perret Cedex Tél.: 01 47 59 77 00. Fax.: 01 47 37 54 52 - www.phyteurop.com

- - Après contact avec la peau : Laver immédiatement et abondamment à l'eau et au savon
- Après contact avec les yeux : Rincer les yeux pendant plusieurs minutes, sous l'eau courante en écartant bien les paupières.

  Après ingestion : Rincer la bouche à l'eau. Ne pas faire vomir.
- tous les cas, si les symptomes persistent ou en cas de malaise, consulter un cin et lui présenter l'étiquette et/ou la fiche de données de sécurité.

medech et su presente l'esqueux eurou la titure de données de sécurité. La fiche de données de sécurité peut être obtenue gratuitement sur internet à l'adresse www.quickfds.com.



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### Appendix 3 Letter of Access

Provided upon request.