

REGISTRATION REPORT

Part A

Risk Management

Product code: AG-CM1-283 CS1

Product name: BODY

Active Substances:

clomazone, 33g/L

metazachlor, 250g/L

COUNTRY: FRANCE

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(New application)

Applicant: ADAMA FRANCE

Date: 15/04/2021

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PART A – Risk Management

The company ADAMA FRANCE has requested marketing authorisation in France for the product BODY (product code: AG-CM1-283 CS1), containing 33g/L clomazone and 250g/L metazachlor for use as an herbicide.

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 BODY (AG-CM1-283 CS1) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of BODY (AG-CM1-283 CS1) have been made using endpoints agreed in the EU peer reviews of both clomazone and metazachlor.

This document describes the specific conditions of use and labelling required for France for the registration of BODY (AG-CM1-283 CS1).

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 ADAMA FRANCE's application to market BODY (AG-CM1-283 CS1) (second trade name: SULTAN MAX) in France as an 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 first authorisation of this product in France and in other MSs of the Southern zone.

1.2 Active substance approval

Clomazone

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Specific provisions of regulation were as follows:

PART A

Only uses as herbicide may be authorised.

PART B

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 clomazone, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 9 October 2007 shall be taken into account.

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

- the operator safety and ensure that conditions of use prescribe the application of adequate personal protective equipment,
- the protection of non-target plants and must ensure that the conditions of authorisation include, where appropriate, risk mitigation measures such as buffer zones

An EFSA conclusion is available (EFSA Scientific Report (2007) 109, 1-7).

A Review Report is available (SANCO/2823/07 rev 2, 10 September 2007).

Metazachlor

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Commission Implementing Regulation (EU) No 127/2012 of 14 February 2012 amending Implementing Regulation (EU) No 540/2011 as regards an extension of the use of the active substance metazachlor.

Specific provisions of Regulation (EU) No 540/2011 were as follows:

PART A

Only uses as herbicide may be authorised; application max. of 1.0 kg/ha only every third year on the same field.

PART B

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 metazachlor, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 26 September 2008 shall be taken into account.

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

- the operator safety and ensure that conditions of use prescribe the application of adequate personal protective equipment,
- the protection of aquatic organisms,
- the protection of the groundwater, when the active substance is applied in regions with vulnerable soil and/or climatic conditions.

Conditions of authorisation shall include risk mitigation measures and monitoring programmes shall be initiated to verify potential groundwater contamination from the metabolites 479M04, 479M08, 479M09, 479M11 and 479M12 in vulnerable zones, where appropriate.

If metazachlor is classified under Regulation (EC) No 1272/2008 as ‘suspected of causing cancer’, the Member States concerned shall request the submission of further information on the relevance of the metabolites 479M04, 479M08, 479M09, 479M11 and 479M12 with respect to cancer.

They shall ensure that the notifiers provide that information to the Commission within six months from the notification of such a classification decision.

Specific provisions of Regulation (EU) No 127/2012 were to amend Part A above as follows:

PART A

Only uses as herbicide may be authorised. Applications shall be limited to a total dose of not more than 1.0 kg metazachlor/ha in a three-year period on the same field.

An EFSA conclusion is available (EFSA Scientific Report (2008) 145, 1-132 Conclusion on the peer review of metazachlor).

A Review Report is available (SANCO/140/08 – final rev. 2 24 January 2012).

1.3 Regulatory approach

The present applications (2012-0486 and 2015-0326 [modification of the declared information] for BODY (AG-CM1-283 CS1); 2012-0487 for SULTAN MAX) were evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses)¹ 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”)² – 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.

The French Order of 12 September 2006³ provides that:

- unless formally stated in the product authorisation, the pre harvest interval (PHI) is at least 3 days;
- unless formally stated in the product authorisation, the minimum buffer zone alongside a water body is 5 metres;
- unless formally 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, 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 1107/2009⁴, 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 546/2011⁵, and are expressed as “acceptable” or “not acceptable” in accordance with those criteria.

Finally, the French Order of 26 March 2014⁶ 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 extrapolation⁷ 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 French Food Safety Agency, Afssa, before 1 July 2010

² 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

³ <http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000425570>

⁴ 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

⁵ 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

⁶ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGR1407093A/jo>

⁷ SANCO document “guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/ 7525/VI/95 - rev.9

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of BODY (AG-CM1-283 CS1), 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 the supporting data in Document K; the ownership of the data is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7. A copy of the letter(s) of access is reproduced in Part A, Appendix 3.

2 DETAILS OF THE AUTHORISATION

2.1 Product identity

Product name (code)	BODY (AG-CM1-283 CS1); second trade name: SULTAN MAX
Authorisation number	2210036
Function	Herbicide.
Applicant	ADAMA FRANCE
Composition	33g/L clomazone 250g/L metazachlor
Formulation type (code)	A mixed formulation (ZC) of capsule suspension (CS) and suspension concentrate (SC)
Packaging	High-density polyethylene (HDPE) container containing 5 L product.

2.2 Classification and labelling

2.2.1 Classification and labelling under Directive 99/45/EC

Not applicable after 1st June 2015.

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

Physical hazards	-		
Health hazards	Carcinogenicity, Hazard Category 2 Sensitisation — Skin, Hazard Category 1		
Environmental hazards	Hazardous to the aquatic environment — Acute Hazard, Category 1 Hazardous to the aquatic environment — Chronic Hazard, Category 1		
Hazard pictograms			
Signal word	Warning		
Hazard statements	H351	Suspected of causing cancer	

	H317	May cause an allergic skin reaction
	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)	“Contains 1,2-benzisothiazol-3(2H)-one and 5-chloro-2-methyl-4-isothiazolin-3-one and 2-methyl-2H-isothiazol-3-one – may produce an allergic reaction.”	

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

2.2.3 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 groundwater, do not apply this or any other product containing clomazone more than once every third year.
SPe 1	To protect groundwater, do not apply this or any other product containing metazachlor more than once every 3 years at the application rate of 500 g / ha or more than once every 4 years at the dose of 750 g / ha.
SPe 2	To protect aquatic organisms, do not apply to artificially drained soil with clay content greater than or equal to 45 %.
SPe 2	To protect groundwater, do not apply this product on a field with referenced naturel well or gulf.
SPe 3	To protect aquatic organisms, respect an unsprayed buffer zone of 5 metres ⁸ incorporating an unsprayed vegetative buffer zone of 5 metres to surface water bodies.
SPe 3	To protect non-target plants, respect an unsprayed buffer zone of 5 metres to non-agricultural land.

2.2.4 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 : F- Application must be made pre-emergence of the crop.

⁸ The legal basis for this is **Titre III Article 11** of the French Order of 12 September 2006 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]

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 12 September 2006 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 12 September 2006, PHI cannot be lower than 3 days unless specifically stated in the assessment and decision.

Other mitigation measures:

- The product must be stored at a temperature below 40 °C.
- The product must be shaken well prior to use.
- For succeeding crops, respect the following plant back interval:
 - a waiting period of 365 days for leafy crops,
 - a waiting period of 120 days for root and tuber crops,
 - a waiting period of 90 days for crops having a short growth cycle (around 30 days between sowing/plantation and harvest).

The label must contain the following statement:

“Contains 1,2-benzisothiazol-3(2H)-one and 5-chloro-2-methyl-4-isothiazolin-3-one and 2-methyl-2H-isothiazol-3-one – may produce an allergic reaction.”

“Specify the measures limiting the transfer, in particular:

- In clayey soils with large shrinkage cracks, surface cultivation is necessary in order to limit rapid flow to groundwater.
- Use should be avoided in plots with areas of rapid infiltration (other than the referenced naturel well or gulf).
- In areas with karstic subsoils, the use of the active substance must be accompanied by measures to slow down its transfer to groundwater, such as grassing of sinkholes.”

The label must reflect the conditions of authorisation.

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.

PPP (product name/code)	BODY (AG-CM1-283 CS1)	Formulation type:	GAP rev. 1, date: 2021-04-15
active substance 1	clomazone	Conc. of a.s. 1:	A mixed formulation (ZC) of capsule suspension (CS) and suspension concentrate (SC)
active substance 2	metazachlor	Conc. of a.s. 2:	33 g/L
Applicant:	ADAMA FRANCE	professional use	250 g/L
Zone:	southern EU	non-professional use	<input checked="" type="checkbox"/> <input type="checkbox"/>
Verified by MS:	yes		

Crop and/or situation (a)	Zone	Product code	F G or I (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI (days) (l)	Remarks: (m)
					Type (d-f)	Conc. of a.s. (i)	method kind (f-h)	growth stage & season (j)	number min max (k)	interval between applications (min)	kg a.s./hL min max	water L/ha min max	kg a.s./ha min max		

General remark: max. of 1000 g metazachlor./ha every 3 years (EU restriction)															
Winter oilseed rape	FR	AG-CM1-283 CS1	F	Annual dicot. weeds, blackgrass, wind bentgrass, annual bluegrass	ZC *	33 g/L CLO 250 g/L MET	Spraying	Pre-emergence BBCH Crop: 08	1	-	CLO: 0.025-0.099 MET: 0.1875- 0.750	100-400	0.099 kg CLO/ ha 0.750 kg MET/ ha	F	3.0 L product/ha (max.) Acceptable

* Formulation: Mixture of CS + SC = ZC;

CLO: Clomazone;

MET: Metazachlor

Remarks:

- (a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure).
- (b) Outdoor or field use (F), glasshouse application (G) or indoor application (I).
- (c) e.g. biting and sucking insects, soil born insects, foliar fungi, weeds.
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR).
- (e) GCPF Codes - GIFAP Technical Monograph No 2, 1989.
- (f) All abbreviations used must be explained.
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench.
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.

- (i) g/kg or g/l.
- (j) Growth stage at 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.
- (k) The minimum and maximum number of application possible under practical conditions of use must be provided.
- (l) PHI - minimum pre-harvest interval.
- (m) 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

The formulation BODY (AG-CM1-283 CS1) is a light brown water-based liquid mixture (ZC) of capsule suspension (CS) + suspension concentrate (SC), with characteristic odour. All studies have been performed in accordance with the current requirements. It is not explosive and has no oxidising properties. It has a self-ignition temperature of 415°C and is not highly flammable. In aqueous solution (1 %), its pH is 6.6 at 20°C. Stability data indicate a shelf life of at least two years at ambient temperature (HDPE). Its technical characteristics are acceptable for a ZC formulation.

The product must be stored at a temperature below 40 °C and be shaken before use.

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.

3.1.2.2 Analytical methods for residues

Analytical methods are available in the Draft Assessment Reports and in this dossier and validated for the determination of residues of metazachlor and clomazone in plants (high-oil-content commodities), foodstuffs of animal origin, soil, water (surface and drinking) and air.

To update the dossier and to be in accordance with SANCO/825/00/rev8.1 the following analytical methods are required (at the renewal of approval of the active substance):

- A fully validated method with ILV for the determination of clomazone residue in kidney or liver.

The active substances are neither toxic nor very toxic, hence no analytical method is required for the determination of residues in biological fluids and tissues.

3.1.3 Mammalian Toxicology

3.1.3.1 Acute Toxicity

Acute toxicity studies were performed on BODY (AG-CM1-283 CS1) and yielded the following results:

- rat oral LD50 > 2000 mg/kg bw;
- rat dermal LD50 > 2000 mg/kg bw;
- rat inhalation LC50 > 1.35 mg/L/4h;
- no eye irritancy effect in rabbit;
- no skin irritancy effect in rabbit;
- skin sensitising effect in mice (local lymph node assay [LLNA]).

The non-radioactive cell count LLNA is not currently validated and no guideline is available. Since the threshold for positivity of 1.4 is not currently scientifically validated, no conclusion can be made on the category 1A or 1B for CLP classification. Although the method used is not currently validated, the test has been accepted since positive results were observed. On the basis of these experimental results and the classification of active substance and co-formulants, the classification of BODY (AG-CM1-283 CS1) is as shown in Section 2.2.

3.1.3.2 Operator Exposure

Dermal absorption

No percutaneous absorption study has been submitted for BODY (AG-CM1-283 CS1).

For clomazone, the risks to operators, bystanders and workers have been estimated on the basis of dermal absorption values of 100 % for the non-diluted and diluted formulation.

For metazachlor, the risks to operators, bystanders and workers have been estimated on the basis of dermal absorption values of 10 % for the non-diluted and diluted formulation, based on an *in vitro* study on human skin with a similar formulation.

Exposure assessment

The applicant made an estimate of operator exposure and recommendations for the prevention of risks to operators.

- **during mixing/loading**

- Gloves (nitrile, EN 374-3)
- Working coveralls 65% polyester / 35% cotton; minimum 230 g/m²; with water repellent treatment
- Partial PPE (long-sleeved aprons or overall) of Category III and Type PB (3), to wear over the coverall mentioned above;

- **during application**

If application with tractor with a cab

- Working coveralls 65% polyester / 35% cotton; minimum 230 g/m²; with water repellent treatment
- Disposable nitrile gloves certified EN 374-2, in the case of an intervention on application equipment during spraying is necessary. However, gloves should be worn only outside the tractor cab and stored after use outside the cab.

If application with tractor without cab

- Working coveralls 65% polyester / 35% cotton; minimum 230 g/m²; with water repellent treatment
- Disposable nitrile gloves certified EN 374-2, in the case of an intervention on application equipment during spraying is necessary.

- **During cleaning of spraying equipment**

- Nitrile gloves certified EN 374-3 ;
- Working coveralls 65% polyester / 35% cotton; minimum 230 g/m²; with water repellent treatment
- Partial PPE (long-sleeved aprons or overall) of Category III and Type PB (3), to wear over the coverall mentioned above.

Considering the proposed uses, operator systemic exposure was estimated using the BBA (German) Operator Exposure Model. with the following parameters:

- Tractor-mounted/trailed boom sprayer, hydraulic nozzles;
- Application rate: 3 L/ha (99 g clomazone/ha and 750 g metazachlor/ha);
- Average area treated per day: 20 ha (BBA);
- Duration of spraying: 6 hours.

Estimated exposure according to the German model (taking into account a protection factor of 90 % for the working coverall and gloves):

Crops	Equipment	Personal protection	% AOEL clomazone (0.133 mg/kg bw/d)	% AOEL metazachlor (0.2 mg/kg bw/d)
Oilseed rape	Tractor-mounted/trailed boom sprayer	With gloves during mixing and loading, and coverall	41	21

These results show that, with gloves during mixing and loading and a coverall, calculated exposure is < 100 % of the AOEL of clomazone and metazachlor. The health risk to operators is considered acceptable, with personal protective equipment.

3.1.3.3 Bystander Exposure

The estimation of bystander exposure to clomazone and metazachlor was calculated using data from EUROPOEM II.

Exposure is calculated as 0.53 % and 0.4 % of the AOELs of clomazone and metazachlor, respectively, considering a 60 kg person situated seven metres away from the spraying operation and exposed for five minutes. The health risk to bystanders is therefore considered acceptable.

3.1.3.4 Worker Exposure

BODY (AG-CM1-283 CS1) is applied pre-emergence, therefore worker intervention after treatment is not expected.

Re-entry exposure: a period of 48 hours should be recommended.

If the worker would have performed different tasks on the treated crops:

- Working coverall 65% polyester / 35% cotton; minimum 230 g/m²; with water repellent treatment.

3.1.4 Residues and Consumer Exposure

3.1.4.1 Residues

Primary crop metabolisms were sufficiently investigated to define residue of both active substances metazachlor and clomazone for enforcement and risk assessment purposes in the crops under consideration (oilseed brassicas/rapeseed).

Regarding the magnitude of residues in oilseed rape, a sufficient number of residue trials is available to support the intended GAPs in France. These data allow it to be considered that no quantifiable residues of metazachlor and clomazone will be present in grains, and to confirm that no MRL exceedence will result from the intended uses.

As residues of metazachlor and clomazone do not exceed the trigger value of 0.1 mg/kg in oilseed rape, there is no need to investigate the effect of industrial and/or household processing.

Residues in succeeding crops have been sufficiently investigated; the following mitigation measures are proposed :

- For succeeding crops, respect the following plant back interval:
 - a waiting period of 365 days for leafy crops,
 - a waiting period of 120 days for root and tuber crops,
 - a waiting period of 90 days for crops having a short growth cycle (around 30 days between sowing/plantation and harvest).

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

3.1.4.2 Consumer exposure

The toxicological profiles of metazachlor and clomazone were evaluated at EU level, which resulted in the proposal of ADIs (0.08 mg/kg for metazachlor and 0.133 mg/kg for clomazone) and an ARfD (0.5 mg/kg for metazachlor) that were considered in the framework of this evaluation. An ARfD was not deemed necessary for clomazone.

Based on EFSA PRIMo (rev2), chronic and acute exposures were considered acceptable for all groups of consumers.

3.1.5 Environmental fate and behaviour

The fate and behaviour in the environment of the formulation have been evaluated according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review were used to calculate PECs for the active substances and their 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.

The PEC of clomazone, metazachlor and their 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 review or agreed in the assessment based on new data provided.

PEC_{soil} and PEC_{sw} derived for the active substances and their metabolites are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

The PEC_{gw} calculated for clomazone, metazachlor and for one to three of its soil metabolites are below the threshold values defined in the guidance SANCO/221/2000¹², after the use of the preparation BODY (AG-CM1-283 CS1). The PEC_{gw} calculated for two to four metazachlor metabolites are above the threshold values defined in SANCO/221/2000, after the use of the preparation BODY (AG-CM1-283 CS1).

Additional data were provided with groundwater monitoring for the five soil metabolites of metazachlor, dedicated to the intended use on oilseed rape. The design of the monitoring study has been considered appropriate in terms of well selection (vulnerability and representativeness of the use of metazachlor on oilseed rape). The data show a groundwater contamination throughout the year for at least half of the selected wells for two non-relevant metabolites BH 479-8 (for which around 30 % of the analyses are above the threshold value of 0.1 µg/L) and BH 479-4 (for which 14 % of the analyses are above the threshold value of 0.1 µg/L).

The results from the PEC_{gw} calculations and the data from the French monitoring show groundwater contamination by metazachlor metabolites. Moreover, there are some uncertainties due to the limited number of analyses. Therefore, a significant groundwater contamination by the non-relevant metazachlor metabolites and a punctual exceedence of the regulatory threshold of 0.1 µg/L for the relevant metabolite BH 479-9 cannot be excluded.

Based on vapour pressures, information on volatilisation from plants and soil, and DT50 calculation, no significant contamination of the air compartment is expected for the intended uses.

Implications for labelling resulting from environmental fate assessment:

To protect groundwater, do not apply this or any other product containing clomazone more than once every third year.

To protect groundwater, do not apply this or any other product containing metazachlor more than once every 3 years at the application rate of 500 g / ha or more than once every 4 years at the dose of 750 g / ha.

To protect groundwater, do not apply this product on a field with referenced naturel well or gulf.

¹² Guidance document on the assessment of the relevance of metabolites in groundwater of substance regulated under Council directive 94/414/EEC. SANCO/2000-rev10-final, 25 February 2003.

3.1.6 Ecotoxicology

3.1.6.1 Effects on Terrestrial Vertebrates

The acute screening assessment for birds exposed to BODY (AG-CM1-283 CS1) revealed that the TER_A value is above the trigger of 10 indicating no potential acute risk for birds and mammals.

The long-term Tier 1 assessment for birds and mammals exposed to BODY (AG-CM1-283 CS1) revealed that the TER_{LT} values are above the trigger of 5, again indicating no potential reproductive risk for birds.

Due to the low log Pow (not greater than 3) bio-accumulation of clomazone and metazachlor is not expected and thus secondary poisoning through BODY (AG-CM1-283 CS1) via the food chain can be excluded. The estimation of potential risk for birds and mammals exposed to BODY (AG-CM1-283 CS1) through consumption of contaminated water from puddles on soil shows no unacceptable risk.

3.1.6.2 Effects on Aquatic Species

The TER values of clomazone, its main metabolites and metazachlor are above the trigger values when a 5-metre vegetative buffer strip is applied and a restriction to not use on artificially drained soils with clay content greater than or equal to 45 %.

3.1.6.3 Effects on Bees and Other Arthropod Species

All hazard quotients for oral (Q_{HO}) and contact exposure (Q_{HC}) are below the trigger of 50, indicating that the formulation and the active substances pose a low risk to bees. Therefore a low risk to bees is expected from the application of BODY (AG-CM1-283 CS1).

All hazard quotients (HQs) for *Typhlodromus pyri* are below the trigger of 2, indicating that the formulation poses a low risk to non-target arthropods other than bees. Based on the findings of the extended laboratory study performed on *Aphidius rhopalosiphi* no risk is indicated for the in-field area. Thus the risk is considered acceptable for non target arthropods.

3.1.6.4 Effects on Earthworms and Other Soil Macro-organisms

The acute and long-term TER values for earthworms are higher than the respective Uniform Principles' acute trigger value of 10 and 5. This indicates that BODY (AG-CM1-283 CS1) poses no acute and long-term risks to earthworms when applied according to the proposed use rates.

The long-term TER values for the two soil metabolites metazachlor-oxalic acid and metazachlor-sulphonic acid for the soil-dwelling collembolan species *Folsomia candida* are above the trigger of 5. Thus no risk to soil non-target macro-organisms is expected.

No tests on soil macro-organisms and organic matter breakdown for clomazone and metazachlor are required, since the field DT₉₀ is < 365 days for clomazone and metazachlor and only a single application is recommended every third year, indicating that there will be no long-term exposure or accumulation of residues.

3.1.6.5 Effects on organic matter breakdown

See preceding paragraph.

3.1.6.6 Effects on Soil Non-target Micro-organisms

BODY (AG-CM1-283 CS1) had no significant effect on soil micro-organisms at 21.91 mg product/kg dry weight (dw) soil. This is approximately 5 times higher than the maximum PEC_s of 4.392 mg BODY (AG-CM1-283 CS1)/kg dw soil. This supports the conclusion that under field conditions, use of BODY (AG-CM1-283 CS1) at the proposed rates poses no unacceptable risk to non-target soil micro-organisms.

3.1.6.7 Assessment of Potential for Effects on Other Non-target Organisms (Flora and Fauna)

The TER-values for terrestrial plants on vegetative vigour and seedling emergence are below the trigger value of 5 for one application in winter oilseed rape at 1 m distance, if applied as recommended in the use pattern. Thus, as a risk mitigation measure for non-target plants, a buffer zone of 5 m has to be applied.

3.1.7 Efficacy

This is a request for the authorisation of the fungicide product, BODY (AG-CM1-283 CS1), based on clomazone (33 g/L) + metazachlor (250 g/L). This application for authorisation has been made in France only, the zRMS.

The product complies with the Uniform Principles.

Considering the data submitted:

- The efficacy of BODY (AG-CM1-283 CS1) is considered satisfactory.
- The selectivity of BODY (AG-CM1-283 CS1) is considered satisfactory.
- The risk of negative impact (yield, quality, propagation, succeeding adjacent crops) is considered acceptable.
- The risk of resistance developing or appearing is considered low.

3.2 Conclusions arising from French assessment

Taking into account the above assessment, an authorisation **can be granted**. A copy of the decision issued can be found 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

Set up a monitor of relevant and irrelevant metabolites in groundwater, particularly those intended for human consumption.

If the water quality limit for human consumption is observed, notify the competent authorities and quickly put in place additional measures to protect the supply areas of the catchment areas.

3.4.2 Post-authorisation data requirements

No further information is required.

3.4.3 Label amendments (see label in Appendix 2):

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 et les demandes associées du produit phytopharmaceutique **BODY***

de la société ADAMA FRANCE SAS

enregistrées sous les n°2012-0486, 2012-0487 et 2015-0326

Vu les conclusions de l'évaluation de l'Anses du 2 mai 2016 et du 11 mars 2020,

Vu le procès-verbal de la réunion du comité de suivi des AMM en date du 24 septembre 2020,

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 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.



Informations générales sur le produit	
Noms du produit	BODY SULTAN MAX
Type de produit	Produit de référence
Titulaire	ADAMA FRANCE SAS 33 rue de Verdun 92156 SURESNES France
Formulation	Formulation mixte de suspension concentrée (SC) et suspension de capsule (CS) (ZC)
Contenant	33 g/L - clomazone 250 g/L - métazachlore
Numéro d'intrant	9907-2012.01
Numéro d'AMM	2210036
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 31 juillet 2022.

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 15 AVR. 2021

Caroline SEMAILLE
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
Bidons en polyéthylène haute densité	5 L

Classification du produit	
La classification retenue est la suivante :	
Catégorie de danger	Mention de danger
Sensibilisants cutanés - Catégorie 1B	H317 : Peut provoquer une allergie cutanée
Cancérogénicité - Catégorie 2	H351 : Susceptible de provoquer le cancer
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

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
15205901 Crucifères oléagineuses* Désherbage	3 L/ha	1/an	Jusqu'au stade BBCH 08	F (BBCH 08)	5 (dont DVP 5)	-	5	-

Uniquement sur colza d'hiver.

DVP : Dispositif Végétalisé Permanent.

BODY
AMM n°2210036



Conditions d'emploi du produit

Stockage et manipulation du produit

- Ne pas stocker le produit dans un local où la température peut dépasser 40 °C.
- Agiter le produit dans son emballage avant utilisation.

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 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 ;

• 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.

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.
- Afin d'éviter la présence de résidus dans les cultures suivantes, ne pas planter :
 - De cultures de légumes feuilles ou tiges moins de 365 jours après traitement,
 - De cultures de racines et tubercules moins de 120 jours après traitement,
 - De cultures à cycle court (environ 30 jours entre le semis/la plantation et la récolte) moins de 90 jours après traitement.

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 1 : Pour protéger les eaux souterraines, ne pas appliquer le produit ou tout autre produit contenant de la clomazachlore plus d'une fois tous les 3 ans.
- SPe 1 : Pour protéger les eaux souterraines, ne pas appliquer ce produit ou tout autre produit contenant du métazachlore plus d'une fois tous les 3 ans à la dose de 500 g métazachlore/ha ou plus d'une fois tous les 4 ans à la dose de 750 g métazachlore/ha.
- SPe 2 : Pour protéger les eaux souterraines, ne pas appliquer ce produit sur une parcelle comportant une bétioire référencée.

Protection de la faune

- SPe 2 : Pour protéger les organismes aquatiques, ne pas appliquer sur sol artificiellement drainé ayant une teneur en argile supérieure ou égale à 45 %.
- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 5 mètres comportant un dispositif végétalisé permanent non traité d'une largeur de 5 mètres en bordure des 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)	Référence (mois)
Mettre en place un monitoring des métabolites pertinents et non pertinents du métazachlore dans les eaux souterraines notamment celles destinées à la consommation humaine.	-	-
En cas de dépassement observé des limites de qualité de l'eau destinée à la consommation humaine, prévenir les autorités compétentes et mettre en place rapidement des mesures complémentaires de nature à protéger les aires d'alimentation de captage.	-	-



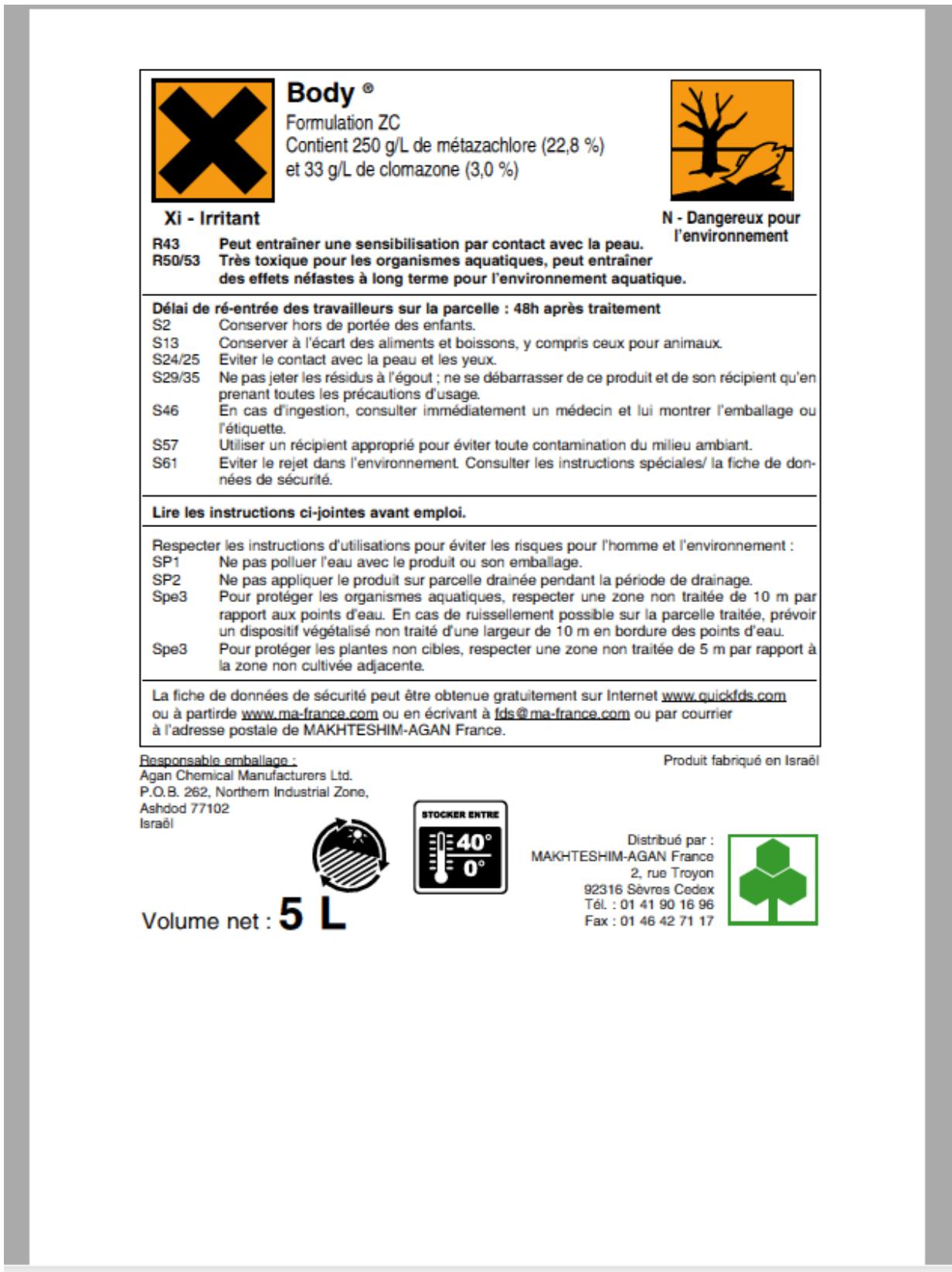
Recommandations relatives à l'étiquette du produit

Il est recommandé de faire figurer les informations suivantes sur l'étiquette :

- Contient de la 1,2-benzisothiazol-3-one, du 5-chloro-2-methyl-4-isothiazolin-3-one et du 2-methyl-2H - isothiazol-3-one, peut produire une réaction allergique.
- Préciser les mesures limitant le transfert du métazachlore et de ses métabolites, comme notamment :
 - Dans les sols argileux présentant des fentes de retrait importantes, un travail superficiel du sol est nécessaire afin de limiter les écoulements rapides vers les eaux souterraines.
 - L'utilisation est à éviter dans les parcelles qui présentent des zones d'infiltration rapide (autres que les bâties référencées).
 - Dans les zones karstiques, l'utilisation doit être accompagnée de mesures permettant de freiner les transferts vers les eaux souterraines (comme l'enherbement des dolines par exemple).

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





MODE D'ACTION – PROPRIÉTÉS :

Body® est herbicide anti-graminées anti-dicotylédones du colza (prélevé).
Body® agit par inhibition de la germination des graines des adventices

CHAMP D'ACTIVITÉ :

A une activité sur :

• Agrostis jouet du vent	• Matricaire camomille	• Tabouret des champs
• Bleuet des champs	• Matricaire inodore	• Trefle des champs
• Capeline irrégulière	• Mercuriale annuelle	• Véronique agreste
• Capselle bourse à pasteur	• Mouron des oiseaux	• Véronique de perse
• Chenopode album	• Myosotis des champs	• Véronique des champs
• Fumeterre des champs	• Passerage des champs	• Vesce
• Gaillet gratteron	• Patience sauvage	• Vulpie queue de rat
• Grande mauve	• Reconcule des marais	
• Lamier pourpre	• Renouée à feuilles de patience	

USAGES ET DOSES HOMOLOGUÉES :

Culture	Dose homologuée
Colza	3 L/ha

Les Limites Maximales de Résidus sont consultables à l'adresse suivante : <http://e-phy.agriculture.gouv.fr/>.
Les mélanges doivent être mis en œuvre conformément à la réglementation en vigueur et aux recommandations des guides de bonnes pratiques officiels.
Consulter le site : <http://e-phy.agriculture.gouv.fr>

Délai de ré-entrée des travailleurs sur la parcelle : 48h après traitement, conformément à l'arrêté du 12 septembre 2006 relatif à la mise sur le marché et à l'utilisation des produits visés à l'article L-253-1 du Code Rural.

Pour protéger les organismes aquatiques respecter une zone non traitée de 10 mètres par rapport aux points d'eau.

MODE D'EMPLOI :

PRÉCONISATIONS D'EMPLOI :

APPLICATION SUR COLZA

Body® est un désherbant de post-semis pré-levée du colza. Il est efficace contre de nombreuses adventices, dicotylédones et graminées.

En conditions normales : traitement en prélevée à la dose de 3 L/ha.

- Le semis se fait à date normale pour le terroir, dans des conditions climatiques favorables à la levée (sol frais), au peuplement et à l'enracinement.
- Le sol est bien préparé, finement grumeleux et non motteux.
- Le semis est bien recouvert, à une profondeur régulière de 2 à 3 cm.

Dans ces conditions, **Body®** est appliqué en un seul passage, dans les 3 jours après le semis.

PRÉCAUTIONS D'EMPLOI :

- Ne pas rouler après traitement
- Traiter par temps calme à une température ne dépassant pas 25°C à l'ombre.

CULTURES DE REMPLACEMENT :

En cas de retournement du colza dû à une cause accidentelle (gel, limaces ...) la plupart des cultures (à l'exception du ray-grass) peuvent être réensemencées :

En hiver : blé tendre et orge d'hiver, à condition de faire un bon labour préalable et de semer un peu plus dru.

Au printemps : A condition de faire un bon labour préalable et de semer un peu plus dru : maïs, pomme de terre.

Sans restriction (quel que soit le travail du sol préalable) : betterave, pois, lin à fibre, tourmesol.

A l'automne suivant : toutes cultures.

CONDITIONS D'EMPLOI :

Agiter avant emploi. Verser la quantité nécessaire de **Body®** dans la cuve du pulvérisateur remplie à moitié du volume d'eau nécessaire, le système d'agitation étant en marche, puis compléter avec la quantité d'eau nécessaire à l'application. Rincer trois fois les emballages et verser l'eau de rinçage dans la cuve du pulvérisateur.

Appliquer immédiatement la bouillie après sa préparation, et maintenir l'agitation pendant toutes les opérations de traitement.

Pulvériser les eaux de rinçage de la cuve sur la parcelle.

Porter un vêtement de protection approprié, des gants et un appareil de protection des yeux et du visage pendant toutes les opérations de traitement.

PRÉCAUTIONS GÉNÉRALES :

Gestion du risque d'apparition de résistance

L'utilisation répétée, sur une même parcelle, de préparations à base de substances actives de la même famille chimique ou ayant le même mode d'action, peut conduire à l'apparition d'organismes résistants.

Pour réduire ce risque, il est conseillé d'alterner ou d'associer, sur une même parcelle, des préparations à base de substances actives de familles chimiques différentes ou à modes d'action différents, tant au cours d'une saison culturelle que dans la rotation.

DANS LE CADRE DES BONNES PRATIQUES AGRICOLES :

Conditions de stockage : Conserver le produit dans son emballage d'origine, dans un local réservé à cet usage, à l'abri de la chaleur et à une température comprise entre 0° et 40°C.

Emballages vides : Réemploi de l'emballage interdit. Lors de l'utilisation du produit, bien vider et l'éliminer via les collectes organisées par les distributeurs partenaires de la filière ADIVALOR ou tout autre service de collecte spécifique.

Pour l'élimination des produits non utilisables, faire appel à une entreprise habilitée pour la collecte et l'élimination des produits dangereux.

Mesures d'urgence : En cas d'urgence, contacter le centre antipoison le plus proche de votre domicile ou appeler le 15.

Présentez aux secours la fiche de données de sécurité. Puis signalez vos symptômes au réseau Phyt'attitude : tél. 0 800 887 887 (numéro vert).

RECOMMANDATIONS : Respecter les usages, doses, conditions et précautions d'emploi mentionnés sur l'emballage et qui ont été déterminés en fonction des caractéristiques du produit et des applications pour lesquelles il est préconisé. Conduire sur ces bases la culture et les traitements selon la bonne pratique agricole en tenant compte, sous votre responsabilité, de tous les facteurs particuliers concernant votre exploitation, telles que la nature du sol, les conditions météorologiques, les méthodes culturelles, les variétés végétales, la résistance des espèces, la pression parasitaire... Le fabricant garantit la qualité de ses produits vendus dans leur emballage d'origine ainsi que leur conformité à l'autorisation de vente du Ministère de l'Agriculture. Compte tenu des législations existantes, il appartient à l'utilisateur, dans le cas où les denrées issues des cultures protégées avec cette spécialité sont destinées à l'exportation, de vérifier la réglementation en vigueur dans le pays importateur. Makhteshim Agan ne saurait être tenu en aucun cas pour responsable des conséquences inhérentes à toute copie (totale ou partielle) de cette étiquette, à sa diffusion ou son utilisation non autorisée.

Appendix 3 – Letter(s) of Access



ANSES
Direction des Produits Réglementés
UGAmm
14 rue Pierre et Marie Curie
94701 Maisons-Alfort Cedex

Sèvres, le 16 mars 2015

N/Réf. :054L2015AL.

Objet : Lettre d'accès relative au monitoring des eaux souterraines pour les métabolites du métazachlore en France.

Madame, Monsieur,

Nous vous prions de bien vouloir trouver ci-joint une lettre d'accès aux données qui ont été soumises par BASF concernant le monitoring des eaux souterraines pour les métabolites du métazachlore :

« *Groundwater Monitoring for Metabolites of Metazachlor in France, Final Report covering well selection and metazachlor use surveys (four years of sampling and analysis)* ». *Part 1: Agricultural practices surveys (BASF DocID: 2014/1261094)*

Part 2: Water sampling and analytical results (BASF DocID: 2014/1261095).

Cette lettre d'accès concerne les dossiers suivants en cours d'évaluation:

NOM PRODUIT	COMPOSITION	CODE DEMANDE	N° DOSSIER
SULTAN / BROTHER 500	500 g/L métazachlore	PREX	2012-0783
BODY	33 g/L clomazone + 250 g/L métazachlore	PAMM	2012-0486
BANDONEON	100 g/L quinmérac + 400 g/L métazachlore	PAMM	2012-1707

Ce document vous est fourni en deux exemplaires papier et un CD.

Nous restons à votre disposition pour toutes informations complémentaires et vous prions d'agrérer,
Madame, Monsieur, l'expression de nos salutations distinguées.

Gérald Huart
Directeur du Département Etudes, Développement et Affaires Réglementaires

ADAMA

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Tél. : +33(0)1 41 90 16 96 | Fax : +33(0)1 46 62 64 97 | www.adama.com
Société au capital de 250 000 € - Siren : 349 428 532 - R.C.S Nanterre - APE : 4675Z - TVA: FR12349428532



The Chemical Company

BASF SE, 67114 Limburgerhof, Deutschland

ANSES
Direction des Produits Réglementés
UGAmm
253, avenue du General Leclerc
94701 Maisons Alfort Cedex
France

March 3, 2015
APD/RE, LI 556
Dr. Sibylle Brosius
Tel.: ++49/(0)621/60-27447
Fax: ++49/(0)621/60-27559
E-mail: sibylle.brosius@bASF.com

LETTER OF ACCESS

BASF SE, D-67056 Ludwigshafen, Germany (hereinafter referred to as "BASF") hereby agrees that the reports:

Groundwater Monitoring for Metabolites of Metazachlor in France, Final Report covering well selection and metazachlor use surveys (four years of sampling and analysis)

Part 1: Agricultural practices surveys (BASF DocID: 2014/1261094)
Part 2: Water sampling and analytical results (BASF DocID: 2014/1261095)

related to the ground water monitoring study submitted by BASF on request of the competent French authority for the purpose of obtaining a registration of Metazachlor in France may be utilized by the competent regulatory authorities when considering an application of

ADAMA France s.a.s
6/8 avenue de la Cristallerie,
92316 Sèvres Cedex
France

for the purpose of obtaining, maintaining or renewing a registration of **plant protection products** containing Metazachlor as an active substance whether alone or in combination with other active substances.

However, nothing herein shall require BASF or its affiliates to file any additional data to the competent regulatory authorities.

The above agreement shall in no event be construed as granting ADAMA any property rights whatsoever in the data concerned.

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67117 Limburgerhof, Deutschland

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The Chemical Company

This Letter of Access does not authorize ADAMA to inspect documents submitted by BASF or its local affiliate in France or to receive any copies thereof. Nor shall ADAMA be entitled to authorize any third party to reference the above mentioned report and the data concerned.

BASF SE
Crop Protection

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European Regulatory Manager



ANSES

Direction des Produits Réglementés
UGAmm
253, avenue du Général Leclerc
94701 Maisons-Alfort Cedex

Sèvres, le 11 septembre 2013

N/Réf. :186L2013MG

Objet : Lettre d'accès relative au monitoring des eaux souterraines pour les métabolites du métazachlore en France.

Madame, Monsieur,

Nous vous prions de bien vouloir trouver ci-joint une lettre d'accès aux données qui ont été soumises par BASF concernant le monitoring des eaux souterraines pour les métabolites du métazachlore.

Cette lettre d'accès concerne les dossiers suivants :

NOM PRODUIT	COMPOSITION	CODE DEMANDE	N° DOSSIER
SULTAN / BROTHER 500	500 g/L métazachlore	PREX	2012-0783
BODY	33 g/L clomazone + 250 g/L métazachlore	PAMM	2012-0486
BANDONEON	100 g/L quinmérac + 400 g/L métazachlore	PAMM	2012-1707

Ce document vous est fourni en deux exemplaires papier et un CD.

Nous restons à votre disposition pour toutes informations complémentaires et vous prions d'agréer,
Madame, Monsieur, l'expression de nos salutations distinguées.



Marion Gagniarre
Responsable Homologation Herbicides
(Tel : +33 (0)1 46 62 64 97
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Filiale de : Makhteshim Chemical Works Ltd. Beer-Sheva, Israël ■ Agan Chemical Manufacturers Ltd, Ashdod, Israël



The Chemical Company

BASF SE, 67114 Limburgerhof, Deutschland

DGAL
SDQPV
251 rue de Vaugirard
75732 PARIS cedex
A l'Attention de Monsieur François HERVIEU
France

Aug. 12, 2013
APD/RE, LI 556
Dr. Sibylle Brosius
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LETTER OF ACCESS

BASF SE, D-67056 Ludwigshafen, Germany (hereinafter referred to as "BASF") hereby agrees that the reports:

Groundwater Monitoring for Metabolites of Metazachlor in France, 3rd Interim Report covering well selection and metazachlor use surveys (two years of sampling and analysis)

Part 1: Agricultural practices (BASF DocID: 2013/1210018)

Part 2: Water sampling and analytical results (BASF DocID: 2013/1210019)

related to the ground water monitoring study submitted by BASF on request of the competent French authority for the purpose of obtaining a registration of Metazachlor in France may be utilized by the competent regulatory authorities when considering an application of

Feinchemie Schwebda GmbH (FCS)
Edmund Rumpler Str. 6
51149 Köln
Germany

for the purpose of obtaining, maintaining or renewing a registration of plant protection products containing Metazachlor as an active substance whether alone or in combination with other active substances.

However, nothing herein shall require BASF or its affiliates to file any additional data to the competent regulatory authorities.

The above agreement shall in no event be construed as granting FCS any property rights whatsoever in the data concerned.

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