

REGISTRATION REPORT
Part A
Risk Management

Product code: GWN-3189B
Product name: CLARY

Chemical active substance(s):
tri-allate, 450g/L

Southern Zone
Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE
(New application)

Applicant: GOWAN FRANCE SAS
Date: 08/08/2019

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PART A

RISK MANAGEMENT

1 Details of the application

The company GOWAN FRANCE SAS has requested a marketing authorisation in France for the product CLARY (formulation code: GWN-3189B), containing 450g/L tri-allate 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 CLARY (GWN-3189B) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of CLARY (GWN-3189B) have been made using endpoints agreed in the EU peer review of tri-allate.

This document describes the specific conditions of use and labelling required for France for the registration of CLARY (GWN-3189B).

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 is the list of data considered for national authorisation.

1.1 Application background

The present registration report concerns the evaluation of GOWAN FRANCE SAS's application submitted (2017-2989) to market CLARY (GWN-3189B) in France (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 Member States (MSs) of the Southern zone.

The current Registration Report (RR) based on Anses's assessment of the application submitted for this product is in compliance with Regulation (EC) no 1107/2009¹, implementing regulations, and French regulations.

The data taken into account are those deemed to be valid either at European level (Review Report and EFSA conclusion) 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 on the acceptability of risk are based on the criteria provided in Regulation (EU) No 546/2011², and are expressed as "acceptable" or "not acceptable" in accordance with those criteria.

¹ 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.

² 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.

1.2 Letters of Access

Not necessary: the applicant is the owner of data which support the approval of the active substance.

1.3 Justification for submission of tests and studies

According to the applicant: « The submission of the dossier GWN-3189B concerns an authorisation of a formulation. The tests and studies submitted were necessary for the evaluations of the registration process in France. ».

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of CLARY (GWN-3189B), 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

GWN-3189B	GWN-3189B
CLARY in MS	CLARY
Authorisation number	N/A : no marketing authorisation granted
Kind of use	Professional
Low risk product (article 47)	No
Function	Herbicide
Applicant	GOWAN France SAS
Active substance(s) (incl. content)	Tri-allate (450g/L)
Formulation type	Caspule suspension (CS)
Packaging	-
Coformulants of concern for national authorisations	Not applicable
Restrictions related to identity	Not applicable
Mandatory tank mixtures	None
Recommended tank mixtures	None

2.2 Conclusion

The evaluation of the application for CLARY (GWN-3189B) resulted in the decision **to refuse** the 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:	Skin sensitisation, category 1B Specific target organ toxicity - Repeated exposure, category 2 Hazardous to the aquatic environment - Chronic Hazard, category 2		
Hazard pictograms:	 SGH07 SGH08 SGH09		
Signal word:	Warning		
Hazard statement(s):	H317: May cause an allergic skin reaction. H373: May cause damage to organs through prolonged or repeated exposure via the oral route H411: Toxic to aquatic life with long lasting effects.		
Precautionary statement(s):	<i>For the P phrases, refer to the existing legislation</i>		

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

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

N/A: Not registered in France.

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

N/A: Not registered in France.

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 2017³ 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 for products applied through spraying or dusting;

³ Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjuvants visés à l'article L. 253-1 du code rural et de la pêche maritime <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGR1632554A/jo/texte>.

- 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 2014⁴ 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 extrapolation⁵ 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

N/A: Not registered in France.

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.

⁴ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGR1407093A/jo>.

⁵ SANCO document “guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/ 7525/VI/95 - rev.9.

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2.6 Intended uses (only NATIONAL GAP)

Please note: The GAP Table below reports the intended uses proposed by the applicant, evaluated and concluded as safe uses by France as zRMS. Those uses are then granted in France. When the conclusion is "not acceptable", the intended use is highlighted in grey and the main reason(s) reported in the remarks.

GAP rev. 1, date: 2019-08-08

PPP: CLARY / GWN-3189B

Active substance 1: tri-allate

Applicant: GOWAN FRANCE SAS

Zone(s): Southern Zone ^(d)Formulation type: CS ^(a, b)Conc. of a.s. 1: 450g/L ^(c)Professional use: Non-professional use:

Verified by MS: Yes

Field of use: Herbicide

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use- No. ^(e)	Member state(s)	Crop and/ or situation (crop destination / pur- pose of crop)	F, Fn, Fpn G, Gn, Gpn or I	Pests or Group of pests con- trolled (additionally: developmen- tal stages of the pest or pest group)	Application				Application rate			PHI (days)	Remarks: e.g. g saf- ener/synergist per ha ^(f)
					Method / Kind	Timing / Growth stage of crop & season	Max. num- ber a) per use b) per crop/ season	Min. inter- val between applications (days)	L product / ha a) max. rate per appl. b) max. total rate per crop/season	kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		

Zonal uses (field or outdoor uses, certain types of protected crops)

1	FR	Winter soft wheat Winter durum wheat Spring soft wheat Spring durum wheat Triticale Spelt	F	Weeds	Broadcast	BBCH 00-09 (Post-sowing, pre-emer- gence of crop)	a) 1 b) 1	-	a) 3.6 b) 3.6	a) 1.62 a) 1.62	100- 400	n.a.	Not acceptable (risk for resident (child), ground- water)
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Remarks	(a) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR).	(d) Select relevant.
table	(b) Catalogue of pesticide formulation types and international coding system CropLife International Technical Monograph n°2, 6th Edition Revised May 2008.	(e) Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1.
heading:	(c) g/kg or g/l.	(f) No authorization possible for uses where the line is highlighted in grey, Use should be crossed out when the notifier no longer supports this use.
Remarks	1 Numeration necessary to allow references.	7 Growth stage at first and last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application.
columns:	2 Use official codes/nomenclatures of EU Member States.	8 The maximum number of application possible under practical conditions of use must be provided.
	3 For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure).	9 Minimum interval (in days) between applications of the same product.
	4 F: professional field use, Fn: non-professional field use, Fpn: professional and non-professional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application.	10 For specific uses other specifications might be possible, e.g.: g/m ³ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
	5 Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named.	11 The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g, kg or L product / ha).
	6 Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.	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)

CLARY (GWN-3189B) is a capsule suspension (CS). All studies have been performed in accordance with the current requirements and the results are deemed to be acceptable. The appearance of the product is a homogeneous brown fluid with a characteristic odour. It is not explosive and has no oxidising properties. The product is not flammable and has a self-ignition temperature of 372°C. In aqueous solution (1% dilution), it has a pH value of 8.64 at 24.8°C. There is no effect of low and high temperature on the stability of the formulation, since after 7 days at 0°C; 8 weeks at 40°C, neither the active ingredient content nor the technical properties were changed. Without the final results of the stability study after 2 years in HDPE/A, the acceptable maximum content in NDIPA (0.0084mg/kg in the formulation) cannot be checked. Therefore, shelf life of the formulation CLARY (GWN-3189B) should be limited to 12 months after the date of manufacture.

Its technical characteristics are acceptable for a CS formulation.

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

The preparation must be stored at temperatures $\leq 40^\circ\text{C}$.

The preparation must not be stored more than 12 months after the date of manufacture.

3.2 Efficacy (Part B, Section 3)

Considering the data submitted:

- the efficacy level of CLARY (GWN-3189B) is considered satisfactory for all the claimed uses.
- the selectivity level of CLARY (GWN-3189B) is considered acceptable for the claimed uses on winter crops. Given the absence of data on spring crops, the evaluation of the selectivity level of CLARY (GWN-3189B) on these uses cannot be acceptable.
- The risk of negative impact on yield, quality, transformation procedures and multiplication are considered acceptable
- the risk of negative impact on succeeding crops is considered acceptable. Nevertheless, specific attention should be paid to susceptible succeeding crops.
- the risk of negative impact on adjacent crops is considered acceptable. Nevertheless, specific attention should be paid to susceptible adjacent crops.
- the risk of resistance development or appearance to tri-allate does not require a monitoring for the claimed use.

3.3 Methods of analysis (Part B, Section 5)

3.3.1 Analytical method for the formulation

Analytical methods for the determination of the active substance and the relevant impurity N-nitrosodiisopropylamine (NDIPA) in the formulation are available and validated.

3.3.2 Analytical methods for residues

Analytical methods are available in the Draft Assessment Report and this dossier and validated for the determination of residues of Tri-allate in plants (dry and no group commodities), food of animal origin, soil, water (surface and drinking) and air.

3.4 Mammalian toxicology (Part B, Section 6)

Endpoints used in risk assessment

Active Substance: Tri-allate		
ADI	0.025mg/kg body weight/day	EU (2010)
ARfD	0.6mg/kg body weight	
AOEL	0.032mg/kg body weight/day	
Dermal absorption		
	Based on an <i>in vitro</i> human study performed on formulation or on a similar formulation:	
		Concentrate (tested) 450g/L
		Diluted formulation (tested) 3.6g/L
	<i>In vitro</i> (human) %	0.4
		11
		Concentrate (used in formulation) 450g/L
		Spray dilution (used in formulation) 4.05g/L
	Dermal absorption endpoints %	0.4
		11
Oral absorption		50%

3.4.1 Acute toxicity

CLARY (GWN-3189B) containing 450g/L tri-allate has a low toxicity with respect to acute oral, inhalation and dermal toxicity and is not irritating to the rabbit skin or eye and is considered as a skin sensitiser.

3.4.2 Operator exposure

Summary of critical use patterns (worst cases):

Crop type	F/G ⁶	Equipment <i>Application method</i>	Maximum application rate (kg as /ha)	Minimum volume water (L/ha)
Cereals	F	Vehicle mounted <i>Downward spraying</i>	1.62 (1 application)	100-400

Considering proposed uses, operator systemic exposure was estimated using the EFSA model⁷:

Crop	Equipment	PPE and/or working coverall	% AOEL Tri-allate
Cereals	Vehicle mounted	Working coverall and gloves during mixing/loading and application	8.0 %

According to the model calculations, it can be concluded that the risk for the operator using CLARY (GWN-3189B) is acceptable with a working coverall and gloves during mixing/loading and application.

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

3.4.3 Worker exposure

Workers may have to enter treated areas after treatment for crop inspection/irrigation activities. Therefore, estimation of worker exposure was calculated according to AOEM model. Exposure is estimated to 80.0% of the AOEL of tri-allate with PPE.

It is concluded that there is no unacceptable risk anticipated for the worker.

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

3.4.4 Bystander and resident exposure

Consideration of acute exposure should only be made where an AAOEL has been established during an approval, review or renewal evaluation of an active substance, i.e. no acute operator or bystander exposure assessments can be performed with the AOEM model where no AAOEL has been set⁸.

Only resident exposure is provided since, according to EFSA Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products (EFSA Journal 2014;12(10):3874): “*No bystander risk assessment is required for PPPs that do not have significant acute toxicity or the potential to exert toxic effects after a single exposure. Exposure in this case will be determined by average exposure over a longer duration, and higher exposures on one day will tend to be offset by lower exposures on other days. Therefore, exposure assessment for residents also covers bystander exposure.*”

⁶ Open field or glasshouse.

⁷ AOEM – Agricultural Operator Exposure Model (EFSA Journal 2014;12 (10):3874).

⁸ Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products (SANTE-10832-2015 rev. 1.7, 2017).

Residential exposure was assessed according to EFSA model. An **unacceptable risk was determined for residents (child)** when drift reduction technology and mitigation measures such as a buffer zone of 10 meters are taken to reduce the resident exposure:

Model (AOEM) - All pathways (mean)	% AOEL Tri-allate
Resident (children)	102,3 %
Resident (adults)	46.9 %

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

Overall conclusion

The **data available are not considered sufficient** for risk assessment, due to the lack of data on the magnitude of residues in plant commodities. The chronic and the short-term intakes of tri-allate residues comprising relevant metabolites resulting from the uses intended in the framework of this application could not be estimated.

As far as consumer health protection is concerned, France disagrees with the authorization of the intended uses.

Data gaps

/

Data required in post-authorization

/

Waiting period before planting crop to be protected

Pre-emergence.

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 PEC values for the active substance 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.

The PEC of tri-allate 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 were provided.

PECsoil and FOCUS STEP 1-4 PECsw derived for the active substance are used for the ecotoxicological risk assessment and mitigation measures are proposed.

The estimated concentrations of active substance in the groundwater do not occur at levels exceeding those mentioned in regulation EC 1107/2009 for all intended uses. However, the PECgw of both metabolites TCPSA and DIPA were not considered reliable due to a major deviation identified in the selection of the

parameter “Plant uptake factor”. This parameter is not derived according to the recommendations of the current guidance documents. **Thus, the PECgw of both metabolites are considered underestimated.**

Considering an application only every 3 years, based on the ‘underestimated’ PECgw calculations, an exceedance of the value of 10 µg/L cannot be excluded for the metabolite TCPSA (maximum value of 9.94µg/L). Moreover, the ‘underestimated’ PECgw for the metabolite DIPA exceed the value of 10µg/L for one scenario at least (maximum value of 20.4µg/L). Furthermore, the results from a monitoring study conducted in Italy is not likely to refine the risk assessment for both metabolites at the national level since no information was provided on the extrapolability of these results to the French agro-climatic conditions.

The notifier also provided preliminary results from a ongoing groundwater monitoring study conducted in France in tri-allate using areas. However, the results are not likely to refine the risk assessment for tri-allate and its metabolites because results for only one sampling are available.

As a consequence, the assessment of the risk of groundwater contamination for both metabolites cannot be acceptable.

3.7 Ecotoxicology (Part B, Section 9)

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 and mammals, other non-target arthropods, earth-worms and other soil macro-organisms, micro-organisms are acceptable for the intended uses.

According to new requirements of Reg. No. 284/2013, information on chronic effects on adult bees and on development of bees should have been submitted as exposure of bees to the formulation cannot be excluded. In absence of these data, the risk for bees cannot be acceptable.

The risk assessment for aquatic organisms cannot be acceptable.

For terrestrial non-target plants, the risks are acceptable when a buffer zone is applied:

- an unsprayed buffer zone of 10m ,
- or a buffer zone of 5m associated with 50% drift reducing nozzles,
- or the use of 90% drift reducing nozzles.

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)

CLARY (GWN-3189B) contains tri-allate which is approved as a candidate for substitution because it fulfills two of PBT criteria (Persistant and Toxic).

Preliminary Step / Request for derogation from comparative assessment:

The information submitted to comply with Article 50(3) of Regulation (EC) No 1107/2009 is considered acceptable. Where it is necessary to acquire experience first through using the product in practice, comparative assessment will not be put in place for any of the requested uses.

In such cases, the authorisation would be granted once only, for a period not exceeding five years.

5 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 “Background of authorisation decision and risk management”.

5.1.1 Post-authorisation monitoring

N/A: Not registered in France.

5.1.2 Post-authorisation data requirements

N/A: Not registered in France.

Appendix 1 Copy of the product authorisation



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

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

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

Vu la demande d'autorisation de mise sur le marché du produit phytopharmaceutique CLARY

de la société GOWAN FRANCE
enregistrée sous le n°2017-2989

Vu les conclusions de l'évaluation de l'Anses du 14 juin 2019,

Considérant que l'exposition liée à l'utilisation du produit est supérieure au niveau acceptable d'exposition au triallate pour le résident enfant,

Considérant qu'il existe un risque inacceptable de contamination des eaux souterraines,

Considérant également que des risques d'effet nocif pour le consommateur et des risques inacceptables pour les organismes aquatiques et les abeilles ne peuvent pas être exclus,

Considérant qu'il ne peut pas être établi que les exigences mentionnées à l'article 29 du règlement (CE) n°1107/2009 sont respectées,

La mise sur le marché du produit phytopharmaceutique désigné ci-après **n'est pas autorisée** en France.

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Informations générales sur le produit

Nom du produit	CLARY
Type de produit	Produit de référence
Titulaire	GOWAN FRANCE 5 Rue du Gué 77139 PUISIEUX France
Formulation	Suspension de capsules (CS)
Contenant	450 g/L - triallate
Numéro d'intrant	1090-2017.01
Numéro d'AMM	-
Fonction	Herbicide
Gamme d'usage	Professionnel

A Maisons-Alfort le,

08 AOUT 2019

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 : Conditions de mise sur le marché demandées

Liste des usages refusés

Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
15105912 Blé "Désherbage	3,6 L/ha	1/an	-
Motivation du refus : L'usage est refusé en raison d'un risque d'effet nocif pour le résident enfant et d'un risque inacceptable de contamination des eaux souterraines. L'usage est également refusé car des risques d'effet nocif pour le consommateur et des risques inacceptables pour les organismes aquatiques et les abeilles ne peuvent pas être exclus.			

Appendix 2 Copy of the product label

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.

CLARY

CLARY est un herbicide sélectif de post-semis/prélevée sur blé tendre, blé dur, épeautre et triticale.

Autorisation de Mise sur le Marché (A.M.M.) N° XXXXXXXX

Délivrée le XX/XX/XXXX

Détenteur de l'A.M.M. : Gowan France S.A.S.
 5 rue du Gué, 77139 Puisieux, France

Suspension de capsules (CS)
 contenant 450 g/L (39.47% m/m) de triallate.

CLARY





SGH07

SGH08

SGH09

ATTENTION

H317	Peut provoquer une allergie cutanée.	
H373	Risque présumé d'effets graves pour les organes à la suite d'expositions répétées ou d'une exposition prolongée par voie orale	
H410	Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme.	
EUH401	Respectez les instructions d'utilisation pour éviter les risques pour la santé humaine et l'environnement.	
P260		Ne pas respirer les brouillards de pulvérisation.
P273		Éviter le rejet dans l'environnement.
P280		Porter des gants de protection/des vêtements de protection.
P302 + P352		EN CAS DE CONTACT AVEC LA PEAU : laver abondamment à l'eau et au savon.
P333 + P313		En cas d'irritation ou d'éruption cutanée: Consulter un médecin.
P501		Eliminer le contenu/récipient conformément à la réglementation locale/régionale/nationale/internationale.
SPe3		Pour protéger les organismes aquatiques, respecter une zone non traitée de 5 mètres par rapport aux points d'eau.
SPe3		Pour protéger les plantes non cibles, respecter une zone non traitée de 10 mètres par rapport à la zone non cultivée adjacente.
SP1		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. Une attention particulière doit être apportée pour éviter la dérive de pulvérisation sur les cultures non-cibles adjacentes à la culture traitée.

Distribué par: GOWAN France SAS - 5, rue du Gué - 77139 PUISIEUX
 Tél : 01 64 36 61 61 - Fax : 01 60 44 70 61

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En cas d'urgence,appelez le 15 ou le centre anti-poison puis signalez vos symptômes au réseau Phyt'attitude, N° vert 0 800 887 887 (appel gratuit depuis un poste fixe).
 Fiche de Données de Sécurité disponible sur le site internet : www.quickfds.com.

N° de lot et date de fabrication : voir emballage
 5 ou 10 L e

Lire attentivement les recommandations d'emploi avant toute utilisation.

Tableau des usages :

Cultures	Usage	Dose d'emploi	Volume d'eau	Nombre maximal d'applications	Délai avant récolte (DAR)	Zone Non Traitée (ZNT)
Blé tendre, blé dur (printemps et hiver), épeautre, tritcale.	Désherbage	3.6 L/ha	100 – 400 L/ha	1	F*	5 m d'un point d'eau 10 m d'une zone non cultivée

* le délai avant récolte est couvert par les conditions d'application et le cycle de croissance de la culture.

Les limites maximales de résidus sont consultables à l'adresse suivante :
<http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/>

Efficacité et mode d'action

- CLARY est particulièrement efficace contre les principales graminées adventices : agrostide jouet du vent, ray-grass, vulpin des champs et folle avoine.
- CLARY agit sur les mauvaises herbes au moment de leur germination, il est absorbé par le coléoptile et empêche leur développement. Une application homogène du produit sur un sol finement préparé est indispensable pour obtenir des performances maximales.

Conditions d'emploi

Appliquer CLARY en post-semis/prélevé à la dose de 3.6 L/ha contre les graminées sur céréales d'hiver et de printemps (blé tendre, blé dur, épeautre et tritcale). L'application du CLARY peut être effectuée immédiatement après le semis et il est important d'appliquer le produit CLARY avant la levée des céréales et des adventices.

Recommandations pour les mélanges

Pour la gestion des adventices dicotylédones, CLARY doit être utilisé en programme avec les produits complémentaires adaptés à chaque type de flore et à chaque culture.
 En cas de forte infestation et afin d'améliorer son efficacité contre les graminées, CLARY peut être inclus dans un programme ou dans un mélange avec d'autres antigraminées, tout en veillant à respecter la réglementation en vigueur.

Respecter la réglementation en vigueur et les recommandations des guides officiels de bonnes pratiques.
 En cas de mélange de préparations, la plus forte valeur pour chacun des critères (Délai Avant Récolte, Zone Non Traitée, Délai de Rentrée) s'applique. Pour tous renseignements complémentaires, consultez votre conseiller technique habituel.

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Précautions d'emploi :

Pendant le mélange/chargement, porter :

- Gants en nitrile certifiés pour la protection chimique EN 374-3,
- Combinaison de travail en polyester 65% / coton 35% avec un grammage de 230 g/m² ou plus avec traitement déperlant,
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée,
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3).

Pendant l'application porter :

- Combinaison de travail en polyester 65% / coton 35% avec un grammage de 230 g/m² ou plus avec traitement déperlant ;

Si application avec tracteur sans cabine :

- Gants en nitrile certifiés pour la protection chimique EN 374-2 à usage unique.

Si application avec tracteur avec cabine :

- Gants en nitrile certifiés pour la protection chimique EN 374-2 à usage unique dans le cadre 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.

Pendant le nettoyage du matériel de pulvérisation, porter :

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

Pour protéger le travailleur :

Dans les cas où le travailleur serait amené à intervenir sur les parcelles traitées :

- Gants en nitrile certifiés pour la protection chimique EN 374-3 en cas de contact avec la culture traitée,
- Combinaison de travail en polyester 65% / coton 35% avec un grammage de 230 g/m² ou plus avec traitement déperlant.

Préparation de la bouillie

Avant de commencer le remplissage de la cuve du pulvérisateur, s'assurer que celle-ci est propre et ne contient aucun résidu d'un traitement précédent.

Bien agiter le bidon avant emploi. Verser la quantité nécessaire de CLARY dans la cuve du pulvérisateur à demi remplie d'eau. Compléter le remplissage en faisant fonctionner le système d'agitation. Ne préparer que la quantité de bouillie nécessaire à l'application.

Lorsque le bidon est vide, rincer soigneusement 3 fois le bidon en veillant à verser l'eau de rinçage dans la cuve du pulvérisateur.

Volume d'eau à l'hectare : 100 à 400 litres. Veiller à assurer une couverture homogène du sol avec la bouillie.

Possibilité de remplacement d'une culture accidentée (climat, parasites, ...):

Dans le cas d'un nouveau semis intervenant après l'application du produit CLARY, ressemer du blé d'hiver ou de printemps, de l'orge d'hiver ou de printemps, du pois protéagineux de printemps, de la betterave, du tournesol ou du maïs. Cependant, quelles que soient les conditions de ré-implantation, il existe toujours un risque de ne pas atteindre le rendement escompté.

Cultures suivantes :

Ne pas semer d'avoine ou toute autre culture de graminées moins d'un an après un traitement avec CLARY. Ne pas semer sous couvert de graminées dans les cultures qui ont été traitées avec CLARY. Il peut être semé du trèfle ou d'autres légumineuses en toute sécurité.

Bonnes pratiques phytosanitaires :

Les symptômes sur les cultures dus aux chevauchements de rampe lors de la pulvérisation sont en général transitoires. Éviter toutefois les chevauchements de rampe et les surdosages, cela pouvant entraîner des dégâts sur la culture et affecter les rendements.

Éviter la dérive de pulvérisation sur les cultures adjacentes, en particulier pour l'avoine et autres cultures de graminées, levées ou sur le point de lever, car elles sont particulièrement sensibles.

Nettoyage du pulvérisateur :

Après chaque traitement avec CLARY, nettoyer soigneusement l'extérieur du pulvérisateur. Rincer soigneusement la cuve du pulvérisateur à l'eau claire conformément à la législation en vigueur. Il est conseillé d'effectuer 3 rinçages, le dernier rinçage s'effectuant avec de l'eau additionnée d'un nettoyant (recommandé pour le nettoyage des pulvérisateurs).

Élimination du 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 rinçage dans la cuve du pulvérisateur. Éliminer les emballages vides via par un service de collecte spécifique (exemple : ADIVALOR, 08 10 12 18 85, numéro Azur prix d'un appel local).
- Éliminer les fonds de cuve conformément à la réglementation en vigueur.

Premiers secours

En cas d'inhalation :

Transporter la victime à l'air libre et la garder au chaud et au repos.

Appeler immédiatement un médecin ou un centre Anti-poison.

En cas de contact avec les yeux :

Laver abondamment avec de l'eau douce et propre durant au minimum 15 minutes en maintenant les paupières écartées. Retirer les lentilles de contact si la victime en porte après 5 minutes de rinçage.

En cas d'irritation, consulter un médecin.

En cas de contact avec la peau :

Enlever les vêtements imprégnés et laver soigneusement la peau avec de l'eau et du savon ou utiliser un nettoyant connu. Ne pas utiliser de solvants ou de diluants.

En cas d'irritation, consulter un médecin.

En cas d'ingestion :

Rincer la bouche avec de l'eau et consulter un médecin ou un centre anti-poison. Montrer l'étiquette. Garder au repos.

Ne pas faire vomir.

Résistance

Les adventices résistantes et en particulier les graminées sont devenues un problème majeur pour de nombreuses cultures. Le principal atout du triallate est son mode d'action différent des familles herbicides les plus utilisées. Le triallate est un inhibiteur de la synthèse lipidique ; il appartient au groupe N tel que défini par le HRAC (Herbicide Resistance Action Committee).

Le triallate est utilisé depuis plus de quarante ans dans de nombreux pays. À ce jour, en France et en Europe, aucune population de graminées n'a développé de résistance au triallate. Cependant, dans la mesure du possible, varier les substances chimiques et alterner avec des produits ayant des modes d'action différents.

IMPORTANT: Respectez les usages, doses, conditions et précautions d'emploi mentionnés sur l'emballage qui ont été déterminés en fonction des caractéristiques du produit et des applications pour lesquelles il est préconisé. Conduisez 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 tels que la nature du sol, les conditions météorologiques, les méthodes culturales, les variétés végétales, la résistance des espèces... Le fabricant garantit la qualité de ses produits vendus dans leur emballage d'origine ainsi que leur conformité à l'autorisation de vente des autorités compétentes.

Appendix 3 Letter of Access

Letter(s) of access and, if necessary, an argumentation according to art. 62.4 of Reg (UE) No 1107/2009 have been submitted and are available under request.