

REGISTRATION REPORT

Part B

Section 6: Ecotoxicological Studies

Detailed summary of the risk assessment

CLOSER (GF-2626)

120 g/L Sulfoxaflor

Southern Zone

Zonal Rapporteur Member State: France

(Field F)

CORE ASSESSMENT

Applicant: DOW AgroSciences

Date: October 2017

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IIIA 10 ECOTOXICOLOGICAL STUDIES

Introduction

This document summarises the ecotoxicological effects of the plant protection product GF-2626 containing the active substance sulfoxaflor, and where appropriate, the active substance and potentially relevant metabolites and evaluates the potential risk to various representatives of terrestrial, aquatic and soil organisms. A risk assessment according to Uniform Principles is provided which demonstrates that use of the product in accordance with the proposed label does not represent an unacceptable risk to the environment.

Sulfoxaflor is a new active substance which has been approved since 18/08/2015 in the EU. Ireland (Pesticide Registration and Control Division, PRCD) is the rapporteur Member State (RMS). A dossier for the active substance was submitted by Dow AgroSciences, under Regulation (EC) 1107/2009, to the RMS in July 2011.

The active substance submission followed a zonal approach where the evaluation was shared by four Member States participating under a work-share umbrella as follows: Ireland - RMS, lead reviewer for the sections Toxicology, Residues and Metabolism along with coordination of the work-share project. France: Lead reviewer for the sections Identity/Physical-Chemical properties, Methods of Analysis and Efficacy/Biology. Poland: Lead reviewer for the section Environmental Fate. Czech Republic: Lead reviewer for the section Ecotoxicology.

The Draft Assessment Report (DAR) on sulfoxaflor was finalised and distributed by Ireland in November 2012, with a recommendation for approval of the active substance according to Regulation (EC) 1107/2009. The EFSA peer review process was conducted and the EFSA conclusion was published in May 2014.

Dow AgroSciences submitted an EU MRL dossier to the RMS, Ireland, in April 2011. The EU MRL evaluation was integrated with the active substance evaluation under 1107/2009. The adoption of MRL/Import tolerances was therefore aligned with the same timing as that of the active substance approval.

There were two representative formulations for the EU active approval submission. These were GF-2372 (500 g/kg WG) and GF-2626 (120 g/L SC).

This current submission is for one of these two formulations, GF-2626. This is the first submission for authorisation of plant protection products containing sulfoxaflor in EU Member States. The proposed zonal RMS for Central Zone and Southern Zone are Ireland and France respectively.

Where appropriate, this document refers to the conclusions of the EFSA review report (EFSA Journal 2014; 12(5):3692) of sulfoxaflor. This will be where: the active substance data are relied

upon in the risk assessment of the formulation; or when the EU review concluded that additional data/information should be considered at national registration.

This Part B document only reviews data (active substance or plant protection product) and additional information that has not previously been considered within the EU review process, as part of the active approval decision. Studies for the active substance which have already been evaluated during the approval process are not summarised. New active substance data are only included if they are considered essential for the evaluation and a full study summary is provided.

Details of the active substance, the active approval Regulation and the Commission Review Report are provided in Table #-1.

Table #-1: Details for the active substance

Active Substance	Approval Regulation	Commission Review Report	EFSA Scientific Report
Sulfoxaflor	Reg. (EU) 2015/1295 (27 July 2015)	SANTE/10665/2015 rev 2 (29 May 2015)	EFSA Journal 2014; 12(5):3692

Information on the detailed composition of GF-2626 can be found in the confidential dossier of this submission (Registration Report - Part C).

According to Regulation (EU) 2015/1295, the applicant shall submit confirmatory information as regards:

- (a) the risk to honey bees via the different routes of exposure, in particular nectar, pollen, guttation fluid and dust;
- (b) risk to honey bees foraging in nectar or pollen in succeeding crops and flowering weeds;
- (c) the risk to pollinators other than honey bees;
- (d) the risk to bee brood.

The applicant shall submit that information to the Commission, the Member States and the Authority by 18 August 2017.

NOTE

Sulfoxaflor is also referred to as manufacture's code numbers X11422208, XR-208, XDE-208 and DE-208 in the section.

Table 10-2: Critical GAP for uses of the product GF-2626 in the southern zone of the EU

Crop and/or situation	F/G or I	Application			Application Rate per Treatment	PHI
		Stage BBCH	Max.	Interval	g a.s./ha	(d)

			Number	(d)	max	
Critical GAP for GF-2626 in the southern zone of the EU						
Citrus (lemons, mandrins, oranges, grapefruits)	F	BBCH 30-85 Mar-Oct	1	7	48	
			2		24	
Pome/stone fruit (peaches and nectarines, Pears, Apples, Plums and cherries)	F	BBCH 51-59 (pre-flowering) BBCH 69-85	1-	-	48	7
			2		24	
Fruiting vegetables (aubergine, cucurbits (cucumbers, courgettes, melon, pumpkin, watermelon)) Pepper, Tomatoes	F	BBCH 20-87 (apr, nov)	1	7	48	1
			2		24	
Brassicas (broccoli, cabbage, cauliflower, brussels sprout, leafy brassicas)	F	BBCH 20-49 Apr-Sept	1	-	24	7
Leafy vegetables (lettuce and other salads (brassicacea) spinach and similar)	F	BBCH 20-49 Apr-Sept	1	-	24	7
Potatoes	F	BBCH 20-95 May-Aug	2	21	24	7
Beans/Peas (fresh)	F	BBCH 40-85 Apr-Jul	2	21	24	14
Ornamentals (trees and bushes, rose), bulbs and flowers	F	BBCH 12-59 All year	1-2	7	24-48	1

F, G, I = Field, glasshouse, indoor

Appendix 1 of this document contains the list of references included in this document for support of the evaluation.

Appendix 2 of this document is the table of intended uses for GF-2626

Table 10-3: Agreed EU physical-chemical properties for sulfoxaflor used in this evaluation (EFSA Journal 2014; 12(5):3692)

Property	Sulfoxaflor
Molar mass	277.3 g/mol
Molecular formula	C ₁₀ H ₁₀ F ₃ N ₃ O S
Solubility in water	At 20°C, 99.7%: pH 5: 1380 mg/L pH 7: 568 mg/L pH 9: 551 mg/L
Vapour pressure	1.4 x 10 ⁻⁶ Pa (20°C, 99.7%)
log P _{OW}	At 20°C, 99.7%: pH 5: 0.806 pH 7: 0.802 pH 9: 0.799
Henry's Law Constant	At 20°C: Unbuffered: 5.77 10 ⁻⁷ Pa.m ³ /mol pH 5: 2.81 10 ⁻⁷ Pa.m ³ /mol pH 7: 6.83 10 ⁻⁷ Pa.m ³ /mol pH 9: 7.05 10 ⁻⁷ Pa.m ³ /mol
Photolytic stability	Compound is not prone to direct (in sterile buffered solution) and to direct and indirect (in natural water) aqueous photolysis
Hydrolytic stability	Compound hydrolytically stable at pH=5, pH=7 and pH=9

Consideration of metabolites

Table 10-4: Sulfoxaflor and its metabolites considered in the EU assessment to require risk assessment (EFSA Journal 2014;12(5):3692)

Code number/name	Compartment(s)
Sulfoxaflor	Soil, groundwater, surface water, sediment, air
X11719474	Soil, groundwater, surface water, sediment
X11519540	Soil, groundwater, surface water
X11579457	Groundwater

IIIA 10.1 Effects on Birds

Effects on birds for GF-2626 were evaluated as part of the EU review of sulfoxaflor. Therefore all relevant data were assessed in the EU review. Risk assessments for GF-2626 with the proposed use pattern are provided here and are considered adequate.

The risk assessment for effects on birds is carried out according to the EFSA guidance (2009)¹. The endpoints employed in the risk assessment for sulfoxaflor are provided in Table 10.1-1.

Table 10.1-1: EU Endpoints - Toxicity of sulfoxaflor, its metabolites and GF-2626 to birds

Compound	Test species	Endpoint	EU agreed endpoints*
Sulfoxaflor	Bobwhite quail	Acute oral LD ₅₀	676 mg/kg bw
GF-2626	Bobwhite quail	Acute oral LD ₅₀	>2000 mg prep./kg bw ^a
X11719474	Bobwhite quail	Acute oral LD ₅₀	>2250 mg/kg bw
X11721061	Bobwhite quail	Acute oral LD ₅₀	1038 mg/kg bw
Sulfoxaflor	Bobwhite quail	Short-term LDD ₅₀	>1152 mg/kg bw/day
Sulfoxaflor	Mallard duck	Short-term LDD ₅₀	>1049 mg/kg bw/day
Sulfoxaflor	Bobwhite quail	Reproduction NOEL	84.4 mg/kg bw/day
Sulfoxaflor	Mallard duck	Reproduction NOEL	25.9 mg/kg bw/day

* EFSA Journal 2014; 12(5):3692

^a: The endpoint is equivalent to >240 mg a.s./kg diet.

Endpoints used in the risk assessment are in **bold**.

A screening dietary assessment has been conducted on the basis of the proposed uses of GF-2626 as summarised in Table 10-2.

In addition, an assessment of the risk from exposure to potentially relevant metabolites and an assessment of the risk from consumption of contaminated drinking water risk assessment have been conducted.

Sulfoxaflor has a log P_{ow} value of 0.802 (at pH 7) indicating a low potential for bioaccumulation in earthworm and fish tissues. Risk assessments for birds feeding on fish and earthworms are not necessary for this active substance and have not been conducted.

IIIA 10.1.1 Acute toxicity exposure ratio (TER_A)

Screening assessment

The initial acute avian screening risk assessment is based on the toxicity value given in Table 10.1-1 and considers the worst-case exposure scenarios for the proposed uses of GF-2626 (Table

¹ European Food Safety Authority (2009). Guidance Document on Risk Assessment for Birds & Mammals on request from EFSA. EFSA Journal 2009, 7(12): 1438

10.1-2). The estimated daily dietary doses (DDD_s) and associated toxicity exposure ratios (TER_s) for the relevant indicator species are presented in the table below (Table 10.1.1-1).

Table 10.1.1-1: Acute screening risk assessment (TER_A) for birds from GF-2626 uses

Crop	Indicator bird	App. Rate (kg/ha)	Shortcut value (acute)	MAF	DDD (mg/kg bw)	LD ₅₀ (mg/kg bw)	TER _A [10]
Pulses, potatoes	Small omnivorous	0.024	158.8	1.2	4.57	676	148
Leafy vegetables	Small omnivorous	0.024	158.8	1.0	3.81		177
Fruiting vegetable	Small omnivorous	0.048	158.8	1.0	7.62		88.7
Orchards, ornamentals	Small insectivorous	0.048	46.8	1.0	2.25		301

MAF = multiple application factor (MAF for 21 day interval used as a worst-case for uses on pulses and potatoes)

DDD = daily dietary dose

Based on the screening assessment, the TER_A values are greater than the trigger of 10, indicating an acceptable acute risk to birds from sulfoxaflor following the proposed uses of GF-2626.

IIIA 10.1.2 Short and long-term toxicity exposure ratios (TER_{ST} and TER_{LT})

Short-term toxicity exposure ratio (TER_{ST})

There is no requirement for the calculation of TER_{ST} for birds under the EFSA birds and mammals guidance document (EFSA Journal 2009; 7(12): 1438) and, consequently, a risk assessment for short-term toxicity has not been conducted.

Long-term toxicity exposure ratio (TER_{LT})

Screening assessment

The initial long-term avian screening risk assessment is based on the toxicity value given in Table 10.1-1 and considers the worst-case exposure scenarios for the proposed uses of GF-2626 (Table 10.1-2). The estimated daily dietary doses (DDD_s) and associated toxicity exposure ratios (TER_s) for the relevant indicator species are presented in the table below (Table 10.1.2-1).

Table 10.1.2-1: Long-term screening risk assessment (TER_{LT}) for birds from GF-2626 uses

Crop	Indicator bird	App. rate (kg/ha)	Shortcut value (long-term)	f _{TWA}	MAF	DDD (mg/kg bw/day)	NOEC (mg/kg bw/day)	TER _{LT} [5]
Pulses, potatoes	Small omnivorous	0.024	64.8	0.53	1.4	1.15	25.9	22.4
Leafy vegetables	Small omnivorous	0.024	64.8	0.53	1.0	0.82		31.4
Fruiting vegetables	Small omnivorous	0.048	64.8	0.53	1.0	1.65		15.7
Orchards, ornamentals	Small insectivorous	0.048	18.2	0.53	1.0	0.46		55.9

MAF = multiple application factor (MAF for 21 day interval used as a worst-case for uses on pulses and potatoes)

DDD = daily dietary dose

f_{TWA} = time weighted average factor

Based on the screening assessment, the TER_{LT} value is greater than the trigger of 5, indicating an acceptable long-term risk to birds from sulfoxaflor following the proposed uses of GF-2626.

Metabolites

In accordance with the EFSA guidance document, the risk to birds from metabolites formed in plants and vertebrate compartments has to be considered.

Birds can be exposed *via* diet to environmental metabolites of sulfoxaflor, particularly from metabolites formed in plant matter tissues, insects, soil organisms or combinations thereof. There are two major metabolites formed in plant tissue: X11719474 and X11721061, and two major soil metabolites: X11719474 and X11519540.

Metabolite X11719474: The acute oral LD₅₀ of X11719474 was determined to be > 2250 mg/kg bw. The acute oral toxicity of sulfoxaflor was 676 mg/kg bw. Thus, X11719474 exhibits less toxicity than parent sulfoxaflor and the avian risk assessment for X11719474 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Metabolite X11519540: This metabolite is a major metabolite in aerobic soil (12.2%), but a minor metabolite in plants (2.1 - 6.9%). The relevant extent of the potential formation of X11519540 in plants and soil is approximately equivalent to the extent of formation in birds and mammals. In the goat metabolism study X11519540 was observed at up to 1.8% of initial parent residues and in the hen metabolism study at up to 6.8% of initial parent residues. Therefore, the toxicity of X11519540 can be considered to be accounted by toxicity studies in birds of the parent material sulfoxaflor and the avian risk assessment for X11519540 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Metabolite X11721061: The acute oral LD₅₀ of X11721061 was determined to be 1038 mg/kg bw. The acute oral toxicity of sulfoxaflor was 676 mg/kg bw. Thus, X11721061 exhibits less toxicity than parent sulfoxaflor and the avian risk assessment for X11721061 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Drinking water assessment

The EFSA Bird and Mammal Guidance Document (EFSA Journal 2009; 7(12):1438) proposes an assessment methodology for the risk to birds from active substances in drinking water using a small granivorous bird as an indicator species.

Leaf Scenario:

In accordance with the Guidance document (EFSA 2009), the leaf scenario is only relevant for acute exposure, due to infrequent formation of such pools in the crop. Since GF-2626 is applied on crops which are likely to create pools in the whorls like brassicas and leaf vegetables, therefore, the leaf scenario is considered relevant. The leaf scenario exposure is calculated using the following equation;

$$PEC_{\text{pool}} = C_{\text{spray}}/5$$

C_{spray} = concentration of active ingredient in the spray application solution

The drinking water rate for a small granivorous bird (15.3 g), considered a worst-case based on the low water content of their diet, is given as 7.0 ml/d or 0.46 L/kg bw/d in the Guidance document (EFSA 2009). This value is applied in the risk assessment to determine the daily dietary intake from water and compared to the acute toxicity endpoint in order to calculate the TER.

For GF-2626, the highest application rate for vegetable crops in which leaf whirl pools might occur is 0.024 kg a.s./ha in a minimum of 200 L/ha. This use is applied in the risk assessment as a worst-case exposure to encompass all other uses. The TER_A calculation is presented in the following table.

Table 10.1.9-01: Sulfoxaflor drinking water TER_A – leaf scenario for cabbage crops

Leaf scenario – drinking water		
Indicator species	Small granivorous bird	Reference
Application rate (g a.s./ha)	24	Proposed GAP cabbage
Spray volume (L/ha)	200	Proposed GAP cabbage
C _{spray} g/L	0.12	-
PEC _{pool} (mg/L)	24	-
DWR granivorous bird (L/kg bw/d)	0.46	Guidance document, EFSA 2009
Daily dose [= PEC _{pool} * DWR] (mg/d)	11.04	--
Endpoint (LD ₅₀) [mg a.s./kg b.w.]	676	EFSA Journal 2014; 12(5):3692
TER _{acute}	61.23	--
Trigger value [TER]	10	--
Comment	Risk acceptable	--

The acute TER for drinking water exposure to birds is above the trigger value of 10, indicating an acceptable risk to birds from this route of exposure following application of GF-2626.

Puddle scenario:

Due to the characteristics of the exposure scenario in connection with the standard assumptions for water uptake by animals, no specific calculations of exposure and TER are necessary since the ratio of effective application rate (in g/ha) to acute and long-term endpoint (in mg/kg bw/d) does not exceed 50 in the case of less sorptive substances ($K_{oc} < 500$ L/kg) or 3000 in the case of more sorptive substances ($K_{oc} \geq 500$ L/kg).

Sulfoxaflor has a K_{oc} of 14 - 35 L/kg. The proposed worst-case rate of use of GF-2626 is a 1 x 0.048 kg a.s./ha. The ratios of effective application rate to relevant endpoints are presented in the following table.

Table 10.1.2-2: Screening step for drinking water assessment– ratio of application rate to relevant endpoint for birds

Substance	Koc (L/kg)	Application rate (g a.s./ha)	Toxicity endpoint (mg a.s./kg bw)	Ratio	Trigger
Sulfoxaflor	14 - 35	48	Acute: 676	0.07	50
			Long-term: 25.9	1.85	

The ratios for acute and reproductive endpoints for sulfoxaflor do not exceed the threshold value of 50. Thus, no specific calculations of exposure for birds through drinking water are necessary. In conclusion, the risk through exposure *via* drinking water from the intended uses of GF-2626 is acceptable.

IIIA 10.1.3 Baits: Concentration of active substance in bait in mg/kg

GF-2626 is not formulated as a bait.

IIIA 10.1.4 Pellets, granules, prills or treated seed

GF-2626 is not formulated as pellets, granules, prills or treated seeds.

IIIA 10.1.4.1 Amount of active substance in or on each item

Not applicable.

IIIA 10.1.4.2 Proportion of active substance LD₅₀ per 100 items and per gram of items

Not applicable.

IIIA 10.1.5 Size and shape of pellet, granule or prill

GF-2626 is not formulated as pellets, granules or prills, therefore this information is not relevant.

IIIA 10.1.6 Acute toxicity of the formulation

The acute toxicity study with the formulation GF-2626 performed on the bobwhite quail summarised below was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.1.6/01, [REDACTED] (2011)
Title:	GF-2626: An Acute Oral Toxicity Study with the Northern Bobwhite Using a Sequential Testing Procedure
Document No:	Dow Study ID: 101304
Guidelines:	OECD test guideline 223 (adopted July 2010)
GLP	Yes (certified laboratory)

Study Comments: IIIA 10.1.6/01	Already reviewed in the EU DAR of Sulfoxaflor.
Agreed Endpoints: IIIA 10.1.6/01	Acute oral LD ₅₀ >2000 mg GF-2626/kg bw (equivalent to >240 mg Sulfoxaflor/L).

IIIA 10.1.7 Supervised cage or field trials

The above risk assessment demonstrated that the proposed uses of GF-2626 do not pose an unacceptable to birds, therefore further studies are not considered necessary.

IIIA 10.1.8 Acceptance of bait, granules or treated seeds (palatability testing)

The information concerned is not relevant since GF-2626 is intended for use as a spray.

IIIA 10.1.9 Effects of secondary poisoning

The EFSA birds and mammals guidance document (EFSA Journal 2009; 7(12): 1438) states that a $\log P_{ow} \geq 3$ is used to indicate that there might be a potential for bioaccumulation (see Section 5.6 Bioaccumulation and food chain behaviour). Sulfoxaflor has a $\log P_{ow}$ value of 0.802 (at pH 7) indicating a low potential for bioaccumulation in earthworm and fish tissues. Risk assessments for birds feeding on fish and earthworms are not necessary for this active substance and have not been conducted.

IIIA 10.2 Effects on Aquatic Organisms

The EU agreed endpoints for the effects of sulfoxaflor, its potentially relevant metabolites and GF-2626 to aquatic life are listed in Tables 10.2-1 and 10.2-2. No additional data have been submitted with this dossier.

Table 10.2-1: EU Endpoints - Toxicity of sulfoxaflor to aquatic species

Compound	Test species	Endpoint	EU agreed endpoints* (mg/L)
<i>Fish</i>			
Sulfoxaflor	<i>Cyprinodon variegatus</i>	96-h LC ₅₀	266 (mm)
X11719474	<i>Oncorhynchus mykiss</i>	96-h LC ₅₀	>478 (mm)
X11519540	<i>Oncorhynchus mykiss</i>	96-h LC ₅₀	>330 (mm)
Sulfoxaflor	<i>Cyprinodon variegatus</i>	38-d NOEC	1.21 (mm)
<i>Invertebrates</i>			
Sulfoxaflor	<i>Daphnia magna</i>	48-h EC ₅₀	>399 (mm)
X11719474	<i>Daphnia magna</i>	48-h EC ₅₀	>205 (mm)
X11519540	<i>Daphnia magna</i>	48-h EC ₅₀	>350 (mm)
Sulfoxaflor	<i>Daphnia magna</i>	21-d NOEC	12.5 (nom)
Sulfoxaflor	<i>Americamysis bahia</i>	96-h LC ₅₀	0.643 (mm)
X11719474	<i>Americamysis bahia</i>	96-h LC ₅₀	>114 (mm)
X11519540	<i>Americamysis bahia</i>	96-h LC ₅₀	>120 (mm)
Sulfoxaflor	<i>Americamysis bahia</i>	28-d NOEC	0.114 (mm)
X11719474	<i>Americamysis bahia</i>	28-d NOEC	2.12 (mm)
Sulfoxaflor	<i>Chironomus dilutus</i>	96-h LC ₅₀	0.622 (mm)
Sulfoxaflor	<i>Chironomus dilutus</i>	10-d LC ₅₀	0.119 mg/kg sediment (mm)
X11719474	<i>Chironomus dilutus</i>	96-h LC ₅₀	>281 (mm)
X11519540	<i>Chironomus dilutus</i>	96-h LC ₅₀	>360 (mm)
Sulfoxaflor	<i>Chironomus riparius</i>	28-d NOEC	0.0384 (mm)

Compound	Test species	Endpoint	EU agreed endpoints* (mg/L)
X11719474	<i>Chironomus riparius</i>	28-d NOEC	10.4 (mm)
X11519540	<i>Chironomus riparius</i>	28-d NOEC	10 (mm)
Algae			
Sulfoxaflor	<i>Navicula pelliculosa</i>	72-h E _b C ₅₀ 72-h E _y C ₅₀ 72-h E _r C ₅₀	85.7 (mm) >101 (mm) >101 (mm)
X11719474	<i>Navicula pelliculosa</i>	72-h E _y C ₅₀ 72-h E _r C ₅₀	>124 (mm) >124 (mm)
X11519540	<i>Navicula pelliculosa</i>	72-h E _y C ₅₀ 72-h E _r C ₅₀	>110 (mm) >110 (mm)
Higher plant			
Sulfoxaflor	<i>Lemna gibba</i>	7 day EC ₅₀	>100 (nom)

* EFSA Journal 2014; 12(5):3692.

Endpoints used in the risk assessment are in **bold**.**Table 10.2-2: EU Endpoints - Toxicity of GF-2626 to aquatic species**

Compound	Test species	Endpoint	EU agreed endpoints* (mg/L)
GF-2626	<i>Oncorhynchus mykiss</i>	96-h LC ₅₀	>840 (nom)
GF-2626	<i>Daphnia magna</i>	48-h EC ₅₀	>840 (nom)
GF-2626	<i>Americamysis bahia</i>	96-h LC ₅₀	3.79 (nom)
GF-2626	<i>Chironomus dilutus</i>	96-h LC ₅₀	>100 (nom)
GF-2626	<i>Navicula pelliculosa</i>	72-h E _y C ₅₀ 72-h E _r C ₅₀	>100 (nom) >100 (nom)

* EFSA Journal 2014; 12(5):3692

Endpoints used in the risk assessment are in **bold**.**Classification of the active substance:**

Active substances	Reference	New classification (CLP) 2 nd ATP to the regulation 1272/2008	
		Hazard category	Code H
Sulfoxaflor	zRMS proposal	Aquatic acute 1	H400 Very toxic to aquatic life
		Aquatic chronic 1	H410 Very toxic to aquatic life with long lasting effects.

Proposal of classification of the preparation

Preparation	Reference	New classification (CLP) 2 nd ATP to the regulation 1272/2008	
		Hazard category	Code H
GF-2626 (CLOSER)	zRMS proposal	Aquatic chronic 2 ¹	H411 Toxic to aquatic life with long lasting effects.

¹Determined by calculation based on the aquatic toxicity of the active substance and principal constituents of the preparation assuming a chronic M factor of 1.

The aquatic risk assessment has been conducted on the basis of the proposed uses of GF-2626 as summarised in Table 10-2.

For the predicted exposure concentrations of GF-2626, sulfoxaflor and its relevant metabolites in the aquatic environment, please refer to Section 5: Environmental Fate (IIIA 9.7 and 9.8). The FOCUS models do not have an ornamental crop included and applicant considered these uses covered by application on citrus, pome/stone fruit and fruiting vegetables (see section 5).

In this case zRMS retained worst-case mitigation measure from these scenarios for ornamental trees and bushes, and rose.

IIIA 10.2.1 Toxicity exposure ratios

IIIA 10.2.1.1 TER_A for fish

TER_A values for fish have been determined for the active substance and the metabolites using the maximum initial FOCUS Step 1 PEC_{sw} values for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). An acute TER_A for the product has also been calculated using the FOCUS drift PEC_{sw} at 3 m. The acute risk assessment for fish is summarised in the following table.

Table 10.2.1.1-1: Fish acute TER values after application of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{sw} (µg/L)	TER _A [100]
GF-2626	>840000	Spray drift in SWASH	36.8194*	>22814
Sulfoxaflor	266000	1	19.96	13327
X11719474	>478000	1	19.91	>24008
X11519540	>330000	1	1.75	>188571

*Highest calculated drift PEC_{sw} value for ditch and stream scenarios

The above TER_A values are greater than the trigger value of 100 demonstrating an acceptable acute risk to fish for the proposed uses of GF-2626.

IIIA 10.2.1.2 TER_{LT} for fish

A TER_{LT} value for fish has been determined for the active substance using the maximum initial FOCUS Step 1 PEC_{sw} value for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). The long-term risk assessment for fish is summarised in the following table.

Table 10.2.1.2-1 Fish long-term TER value after application of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{sw} (µg/L)	TER _{LT} [10]
Sulfoxaflor	1210	1	19.96	60.6

The above TER_{LT} value is greater than the trigger value of demonstrating an acceptable long-term risk to fish for the proposed uses of GF-2626.

IIIA 10.2.1.3 TER_A for *Daphnia*

TER_A values for *Daphnia* have been determined for the active substance and the metabolites using the maximum initial FOCUS Step 1 PEC_{sw} values for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). An acute TER_A for the product has also been calculated using the FOCUS drift PEC_{sw} at 3 m. The acute risk assessment for *Daphnia* is summarised in the following table.

Table 10.2.1.3-1 Aquatic invertebrate acute TER values after application of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{sw} (µg/L)	TER _A [100]
GF-2626	>840000	Spray drift in SWASH	36.8194*	>22814
Sulfoxaflor	>399000	1	19.96	>19990
X11719474	>205000	1	19.91	>10296
X11519540	>350000	1	1.75	>200000

*Highest calculated drift PEC_{sw} value for ditch and stream scenarios

The above TER_A values are greater than the trigger value of 100 demonstrating an acceptable acute risk to *Daphnia* for the proposed uses of GF-2626.

IIIA 10.2.1.4 TER_{LT} for *Daphnia*

A TER_{LT} value for *Daphnia* has been determined for the active substance using the maximum initial FOCUS Step 1 PEC_{sw} value for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). The long-term risk assessment for *Daphnia* is summarised in the following table.

Table 10.2.1.4-1: Aquatic invertebrate long-term TER value after application of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _{LT} [10]
Sulfoxaflor	12500	1	19.96	626

The above TER_{LT} value is greater than the trigger value of 10 demonstrating an acceptable long-term risk to *Daphnia* for the proposed uses of GF-2626.

IIIA 10.2.1.5 TER_A for aquatic insect

TER_A values for *Chironomus* have been determined for the active substance and its metabolites using the maximum initial FOCUS Step 1 PEC_{sw} for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). An acute TER_A for the product has also been calculated using the FOCUS drift PEC_{sw} at 3 m. For the active substance a second TER_A has been calculated based on the maximum initial FOCUS Step 1 PEC_{sed} value and an acute toxicity endpoint from a study exposing *Chironomus* to spiked sediment. The acute risk assessment for *Chironomus* is summarised in the following table.

Table 10.2.1.5-1: Aquatic insect acute TER values after application of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
GF-2626	>100000	Spray drift in SWASH	36.8194*	>2716
Sulfoxaflor	622	1	19.96	31.2
X11719474	>281000	1	19.91	>14114
X11519540	>360000	1	1.75	>205714
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A [100]
Sulfoxaflor	119	1	6.83	17.4

TERs shown in **bold** fall below the relevant trigger.

* Highest calculated drift PEC_{sw} value for ditch and stream scenarios

The above calculated TER_A values for the formulation and the relevant metabolites are greater than the trigger value demonstrating an acceptable risk to *Chironomus*. However, the TER_A values for the active substance are lower than the trigger value of 100 demonstrating that concern remains regarding the acute risk to *Chironomus* using the relevant FOCUS Step 1 PEC_{sw} and PEC_{sed} values for the proposed use of GF-2626 in pome fruit (worst-case FOCUS scenario). Therefore, TER_A values have been calculated using FOCUS Step 2 PEC_{sw} and PEC_{sed} values for all proposed uses (Tables 10.2.1.5-2 to 10.2.1.5-4), i.e. not only the worst-case use (pome fruit).

Table 10.2.1.5-2: Aquatic insect acute TER values after applications of GF-2626 in citrus

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
Sulfoxaflor	622	2	2.52	247
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A [100]
Sulfoxaflor	119	2	0.79	151

Table 10.2.1.5-3: Aquatic insect acute TER values after applications of GF-2626 in pome/stone fruit (early application)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
Sulfoxaflor	622	2	4.67	133
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A [100]
Sulfoxaflor	119	2	1.47	81.0

Table 10.2.1.5-4: Aquatic insect acute TER values after applications of GF-2626 in fruiting vegetables

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
Sulfoxaflor	622	2	0.44	1414
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A [100]
Sulfoxaflor	119	2	0.14	850

Table 10.2.1.5-5: Aquatic insect acute TER values after applications of GF-2626 in leafy vegetables

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A
Sulfoxaflor	622	2	0.22	2827
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A
Sulfoxaflor	119	2	0.07	1700

Table 10.2.1.5-6: Aquatic insect acute TER values after applications of GF-2626 in potatoes, beans and peas

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{sw} (µg/L)	TER _A [100]
Sulfoxaflor	622	2	0.34	1829
Substance	Critical endpoint (µg/kg sediment)	FOCUS SW Step	PEC _{sed} (µg/kg sediment)	TER _A [100]
Sulfoxaflor	119	2	0.11	1082

The above TER_A values are greater than the trigger value of 100 demonstrating an acceptable acute risk to *Chironomus* using the maximum FOCUS Step 2 PEC_{sw} and PEC_{sed} values for the proposed uses of GF-2626 in citrus, fruiting vegetables, leafy vegetables, potatoes, peas and beans. However, the TER_A for the active substance for the proposed use of GF-2626 in pome/stone fruit is still below the trigger value of 100 when using the relevant FOCUS Step 2 PEC_{sed} value demonstrating that concern remains regarding the acute risk to *Chironomus*. Therefore, the TER_A values have been calculated using the FOCUS Step 3 PEC_{sed} values after applications to pome/stone fruit (Table 10.2.1.5-7).

Table 10.2.1.5-7: Aquatic insect acute TER values after applications of GF-2626 in pome/stone fruit (early application)

Substance	Critical endpoint (µg/kg sediment)	PEC _{SED} (µg/kg)		TER _A [100]
		Scenario	Step 3	
Sulfoxaflor	119	D3 Ditch	0.464	256
		D4 Pond	0.185	643
		D4 Stream	0.082	1451
		D5 Pond	0.187	636
		D5 Stream	0.079	1506
		R1 Pond	0.169	704
		R1 Stream	0.164	726
		R2 Stream	0.140	850
		R3 Stream	0.314	379
		R4 Stream	0.181	657

The above TER_A values are greater than the trigger value of 100 demonstrating an acceptable acute risk to *Chironomus* using the maximum FOCUS Step 3 PEC_{sed} values for the proposed uses of GF-2626 in pome/stone fruit (early application).

IIIA 10.2.1.6 TER_{LT} for aquatic insect

TER_{LT} values for *Chironomus* have been determined for the active substance and its metabolites, using the maximum initial FOCUS Step 1 PEC_{sw} values for the proposed use of GF-2626 in

pome/stone fruit (early application, worst-case scenario). The long-term risk assessment for *Chironomus* is summarised in the following table.

Table 10.2.1.6-1: Aquatic insect long-term TER values after applications of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _{LT} [10]
Sulfoxaflor	38.4	1	19.96	1.92
X11719474	10400	1	19.91	522
X11519540	10000	1	1.75	5714

TER shown in **bold** falls below the relevant trigger.

The above calculated the TER_{LT} values for the metabolites are greater than the trigger value demonstrating an acceptable risk to *Chironomus*. However, the TER_{LT} value for the active substance is lower than the trigger value of 10 demonstrating that concern remains regarding the long-term risk to *Chironomus* using the relevant FOCUS Step 1 PEC_{SW} value for the proposed use of GF-2626 in pome fruit (worst-case FOCUS scenario). Therefore, TER_{LT} values have been calculated using FOCUS Step 2 PEC_{SW} values for all proposed uses (Table 10.2.1.6-2), i.e. not only the worst-case use (pome fruit).

Table 10.2.1.6-2: Aquatic insect long-term TER value after applications of GF-2626

Substance	Critical endpoint (µg/L)	Crop	FOCUS SW Step	PEC _{SW} (µg/L)	TER _{LT} [10]
Sulfoxaflor	38.4	Citrus	2	2.52	15.2
		Pome (early)		4.67	8.22
		Fruiting veg.		0.44	87.3
		Leafy veg.		0.22	175
		Potatoes, beans and peas		0.34	113

The above TER_{LT} values are greater than the trigger value of 10 for the proposed uses of GF-2626 in citrus, fruiting vegetables, leafy vegetables, potatoes, peas and beans. However, the TER_{LT} for the active substance for the proposed use of GF-2626 in pome/stone fruit is still below the trigger value of 10 demonstrating that concern remains regarding the chronic risk to *Chironomus*. Therefore, the TER_{LT} values have been calculated using the Step 3 and, when necessary, Step 4 PEC_{SW} values after applications to pome/stone fruit (Table 10.2.1.6-3).

Table 10.2.1.6-3: Aquatic insect long-term TER values after applications of GF-2626 in pome/stone fruit (early application)

Substance	Critical endpoint (µg/L)	PEC _{sw} (µg/L)		TER _{LT} [10]
		Scenario	Step 3	
Sulfoxaflor	38.4	D3 Ditch	3.726	10.3
		D4 Pond	0.227	169
		D4 Stream	3.505	11.0
		D5 Pond	0.227	169
		D5 Stream	3.698	10.4
		R1 Pond	0.227	169
		R1 Stream	3.014	12.7
		R2 Stream	3.999	9.60
		R3 Stream	4.264	9.01
		R4 Stream	3.032	12.7
		Scenario	Step 4 (5 m)	TER_{LT} [10]
		R2 Stream	3.436	11.2
		R3 Stream	3.664	10.5

TERs shown in **bold** fall below the relevant trigger.

The above TER_{LT} values are greater than the trigger value of 10 demonstrating an acceptable chronic risk to *Chironomus* using the maximum FOCUS Step 3 PEC_{sw} values for almost all scenarios, for the proposed uses of GF-2626 in pome/stone fruit (early application). For the R2 and R3 stream scenarios FOCUS Step 4 PEC_{sw} values have been used assuming a 5m spray drift buffer zone.

IIIA 10.2.1.7 TER_A for aquatic crustacean

TER_A values for *Americamysis bahia* have been determined for the active substance and its metabolites using the maximum initial FOCUS Step 1 PEC_{sw} values for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). An acute TER_A for the product has also been calculated using the FOCUS drift PEC_{sw} at 3 m. The acute risk assessment for *Americamysis bahia* is summarised in the following table.

Table 10.2.1.7-1: Aquatic crustacean acute TER values after applications of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
GF-2626	3750	Spray drift in SWASH	36.8194*	102
Sulfoxaflor	643	1	19.96	32.2
X11719474	>114,000	1	19.91	>5726
X11519540	>120,000	1	1.75	>68571

* Highest calculated drift PEC_{SW} value for ditch and stream scenarios

TER shown in **bold** falls below the relevant trigger

The above calculated TER_A values for the metabolites are greater than the trigger value demonstrating an acceptable risk to *Americamysis bahia*. However, the TER_A values for the active substance and the formulation are lower than the trigger value of 100 demonstrating that concern remains regarding the acute risk to *Americamysis bahia* using the relevant FOCUS Step 1 PEC_{SW} value for the proposed use of GF-2626 in pome fruit (worst-case FOCUS scenario). Therefore, TER_A values have been calculated using FOCUS Step 2 PEC_{SW} values for all proposed uses (Tables 10.2.1.7-2), i.e. not only the worst-case use (pome fruit).

Table 10.2.1.7-2: Aquatic crustacean acute TER value after applications of GF-2626

Substance	Critical endpoint (µg/L)	Crop	FOCUS SW Step	PEC _{SW} (µg/L)	TER _A [100]
Sulfoxaflor	643	Citrus	2	2.52	255
		Pome (early)		4.67	138
		Fruiting veg.		0.44	1461
		Leafy veg.		0.22	2923
		Potatoes, beans and peas		0.34	1891

The above TER_A values are greater than the trigger value of 100 demonstrating an acceptable acute risk to *Americamysis bahia* for all proposed uses of GF-2626.

IIIA 10.2.1.8 TER_{LT} for aquatic crustacean

TER_{LT} values for *Americamysis bahia* have been determined for the active substance and the metabolite X11719474 using the maximum initial FOCUS Step 1 PEC_{SW} values for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). The long-term risk assessment for *Americamysis bahia* is summarised in the following table.

Table 10.2.1.8-1: Aquatic crustacean long-term TER values after applications of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical	FOCUS SW	PEC _{SW} (µg/L)	TER _{LT}
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	endpoint (µg/L)	Step		[10]
Sulfoxaflor	114	1	19.96	5.71
X11719474	2120	1	19.91	106

TER shown in **bold** falls below the relevant trigger

The above calculated TER_{LT} for the metabolite X11719474 is greater than the trigger value of 10 demonstrating an acceptable risk to *Americamysis bahia*. However, the TER_{LT} for the active substance is lower than the trigger value of 10 demonstrating that concern remains regarding the long-term risk to *Americamysis bahia* using the relevant FOCUS Step 1 PEC_{sw} value for the proposed use of GF-2626 in pome fruit (worst-case FOCUS scenario). Therefore, the TER_{LT} values have been calculated using the FOCUS Step 2 PEC_{sw} values for all proposed uses (Table 10.2.1.8-2), i.e. not only the worst-case use (pome fruit).

Table 10.2.1.8-2: Aquatic crustacean long-term TER value after applications of GF-2626

Substance	Critical endpoint (µg/L)	Crop	FOCUS SW Step	PEC _{sw} (µg/L)	TER _{LT} [10]
Sulfoxaflor	114	Citrus	2	2.52	45.2
		Pome (early)		4.67	24.4
		Fruiting veg.		0.44	259
		Potatoes, beans and peas		0.34	335

The above TER_{LT} values are greater than the trigger value of 10 demonstrating an acceptable long-term risk to *Americamysis bahia* for the proposed uses of GF-2626.

IIIA 10.2.1.9 TER_A for aquatic gastropod mollusc

Not required.

IIIA 10.2.1.10 TER_{LT} for aquatic gastropod mollusc

Not required.

IIIA 10.2.1.11 TER_{LT} for algae

TER_{LT} values for algae have been determined the active substance and its metabolites using the maximum initial FOCUS Step 1 PEC_{sw} values for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). A TER_{LT} value for the product has also been calculated using the FOCUS drift PEC_{sw} at 3 m. The risk assessment for algae is summarised in the following table.

Table 10.2.1.11-1: Algal TER values after applications of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _{LT} [10]
GF-2626	>100000	Spray drift in SWASH	36.8194*	>2716
Sulfoxaflor	85700	1	19.96	4294
X11719474	>124000	1	19.91	>6228
X11519540	>110000	1	1.75	>1547

*Highest calculated drift PEC_{SW} value for ditch and stream scenarios

The above TER_{LT} values are greater than the trigger value of 10 demonstrating an acceptable risk to algae for the proposed uses of GF-2626.

IIIA 10.2.1.12 Risk for aquatic plants

A TER_{LT} value for aquatic plants has been determined for the active substance using the maximum initial FOCUS Step 1 PEC_{SW} value for the proposed use of GF-2626 in pome/stone fruit (early application, worst-case scenario). The risk assessment for aquatic plants is summarised in the following table.

Table 10.2.1.12-1: Aquatic macrophytes TER value after applications of GF-2626 in pome/stone fruit (early application, worst-case scenario)

Substance	Critical endpoint (µg/L)	FOCUS SW Step	PEC _{SW} (µg/L)	TER _{LT} [10]
Sulfoxaflor	>100000	1	19.96	>5010

The above TER_{LT} is greater than the trigger value of 10 demonstrating an acceptable long-term risk to aquatic plants for the proposed uses of GF-2626.

Conclusion for aquatic risk:

The risk to aquatic organisms is considered acceptable:

- Without mitigations measures for Aubergines, Beans, Brassicas, Bulbs, Ornamentals (< 50 cm), Flowers, Cucurbits, Grapefruit, Leaf vegetables, Peas, Pepper, Potatoes, Tomatoes, Lemons, Mandarins, Oranges,
- With a 5-m buffer zone for Apples, Peaches and Nectarines, Pears and Plums and Cherries, Ornamentals (Trees, bushes and roses²)

² The FOCUS models do not have an ornamental crop included and applicant considered these uses covered by application on citrus, pome/stone fruit and fruiting vegetables (see section 5). In this case zRMS retained worst-case mitigation measure from these scenarios for ornamental trees and bushes, and rose.

IIIA 10.2.2 Acute toxicity of the formulation**IIIA 10.2.2.1 Fish**

The following fish acute toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.2.2.1/01, [REDACTED] (2011a)
Title:	GF-2626: Acute Toxicity to the Rainbow Trout, <i>Oncorhynchus mykiss</i> , Determined Under Static Test Conditions.
Document No:	Dow Study ID: 101909
Guidelines:	OECD 203
GLP	Yes

Study Comments: IIIA 10.2.2.1/01	Already reviewed in the EU DAR for sulfoxaflor.
Agreed Endpoints: IIIA 10.2.2.1/01	Based on nominal concentrations, the 96-hour LC ₅₀ >840 mg GF-2626/L (equivalent to >101 mg sulfoxaflor/L).

IIIA 10.2.2.2 Aquatic invertebrates (*Daphnia*)

The following *Daphnia* acute toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.2.2.2/01, Bergfield, A. (2011b)
Title:	GF-2626: Acute Toxicity to the Water Flea, <i>Daphnia magna</i> , Determined Under Static Test Conditions.
Document No:	Dow Study ID: 101910
Guidelines:	OECD 202
Deviations:	None
GLP	Yes

Study Comments: IIIA 10.2.2.2/01	Already reviewed in the EU DAR for sulfoxaflor.
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Agreed Endpoints: IIIA 10.2.2.2/01	Based on nominal concentrations, a 48-hour EC ₅₀ is >840 mg GF-2626/L (equivalent to >101 mg sulfoxaflor/L).
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IIIA 10.2.2.3 Algae

The following algae toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.2.2.3/01, Rebstock, M. (2011)
Title:	GF-2626: Growth Inhibition Test with the Freshwater Diatom, <i>Navicula pelliculosa</i> .
Document No:	Dow Study ID: 101911
Guidelines:	OECD Guideline 201
GLP	Yes

Study Comments: IIIA 10.2.2.3/01	Already reviewed in the EU DAR for sulfoxaflor.
Agreed Endpoints: IIIA 10.2.2.3/01	Based on nominal concentrations, the 72-hour ErC ₅₀ and EyC ₅₀ is > 100 mg GF-2626/L (equivalent to >12 mg sulfoxaflor/L) and NOEC is 100 mg GF-2626/L (equivalent to >12 mg sulfoxaflor/L).

IIIA 10.2.2.4 Marine or estuarine organisms

The following toxicity study with the Mysid Shrimp performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.2.2.4/01, Bergfield, A. (2011c)
Title:	GF-2626: Acute Toxicity to the Mysid Shrimp, <i>Americamysis bahia</i> , Determined Under Static-Renewal Conditions.
Document No:	Dow Study ID: 101998.
Guidelines:	OPPTS 850.1035
GLP	Yes

Study Comments: IIIA 10.2.2.4/01	Already reviewed in the EU DAR for sulfoxaflor.
Agreed Endpoints: IIIA 10.2.2.4/01	Based on nominal concentrations, the 96-hour LC ₅₀ value was estimated to be 3.79 mg GF-2626/L (equivalent to 0.455 mg sulfoxaflor/L).

IIIA 10.2.2.5 Marine sediment invertebrates

Not required.

IIIA 10.2.3 Microcosm or mesocosm study

A microcosm or mesocosm study is not required for GF-2626 as the risk assessments above indicate an acceptable risk.

IIIA 10.2.4 Residue data in fish

Studies providing residue data in fish are not required for GF-2626 as the active substance has low potential to partition to or remain in fish tissues.

IIIA 10.2.5 Chronic toxicity to fish

IIIA 10.2.5.1 28 day study

Not required.

IIIA 10.2.5.2 Fish early life stage test

Not required.

IIIA 10.2.5.3 Fish life cycle test

Not required.

IIIA 10.2.6 Chronic toxicity to aquatic invertebrates

IIIA 10.2.6.1 21 day test (*Daphnia magna*)

Not required.

IIIA 10.2.6.2 Aquatic insect

The following acute toxicity study with the Midge, *Chironomus dilutus* performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.2.6.2/01, Gerke, A. (2010)
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Title:	GF-2626: Acute 96 Hour Toxicity to the Midge, <i>Chironomus dilutus</i> , Determined Under Static Test Conditions.
Document No:	Dow Study ID: 101303
Guidelines:	OECD Guideline 202, ASTM E729
GLP	Yes

Study Comments: IIIA 10.2.6.2/01	Already reviewed in the EU DAR for sulfoxaflor.
Agreed Endpoints: IIIA 10.2.6.2/01	Based on nominal concentrations, the estimated 96-hour LC ₅₀ was 100 mg GF-2626/L (equivalent to >12 mg sulfoxaflor/L).

IIIA 10.2.6.3 Aquatic gastropod mollusc

Not required.

IIIA 10.2.7 Accumulation in aquatic non-target organisms

Bioaccumulation of the active substance under natural conditions is not expected to occur (refer to Section 10.2.4) and a study is not necessary to determine bioaccumulation in aquatic non-target organisms.

IIIA 10.3 Effects on Terrestrial Vertebrates Other Than Birds

Effects on mammals for GF-2626 were evaluated as part of the EU review of sulfoxaflor. Acute mammalian toxicology data were not considered for GF 2626, however data for GF-2032 were available. GF-2032 is a SC formulation containing 22% wt/wt sulfoxaflor. The toxicity of GF-2032 is expected to be comparable to that of GF-2626.

The risk assessment for effects on mammals is carried out according to the European Food Safety Authority Guidance Document on Risk Assessment for Birds and Mammals (EFSA Journal 2009; 7(12): 1438).

The endpoints employed in the risk assessment for mammals are indicated in Tables 10.3-1.

Table 10.3-1: EU Endpoints - Toxicity of sulfoxaflor, its metabolites and GF-2032 to mammals

Compound	Test species	Endpoint	EU agreed endpoints*
Sulfoxaflor	Rat	Acute oral LD ₅₀	1000 mg/kg bw
Sulfoxaflor	Mice	Acute oral LD ₅₀	750 mg/kg bw
GF-2032	Rat	Acute oral LD ₅₀	>5000 mg prep./kg bw ^a
X11719474	Rat	Acute oral LD ₅₀	>5000 mg/kg bw
X11519540	Rat	Acute oral LD ₅₀	566 mg/kg bw
X11579457	Rat	Acute oral LD ₅₀	>2000 mg/kg bw
X11721061	Rat	Acute oral LD ₅₀	2000 mg/kg bw
Sulfoxaflor	Rat	2-generation reproduction NOAEL	6.63 mg/kg bw/day
X11719474	Rat	Reproduction screening NOAEL	396 mg/kg bw/day
X11719474	Rat	Developmental toxicity NOAEL	368 mg/kg bw/day

*EFSA Journal 2014; 12(5):3692

^a: The endpoint is equivalent to >1100 mg a.s./kg bw.

Endpoints used in the risk assessment are in **bold**

A screening dietary assessment has been conducted on the basis of the proposed uses of GF-2626 as summarised in Table 10-2. Where necessary, first tier and higher tier risk assessments have also been included.

In addition, an assessment of the risk from exposure to potentially relevant metabolites and an assessment of the risk from consumption of contaminated drinking water risk assessment have been conducted.

Sulfoxaflor has a log P_{ow} value of 0.802 (at pH 7) indicating a low potential for bioaccumulation in earthworm and fish tissues. Risk assessments for mammals feeding on fish and earthworms are not necessary for this active substance and have not been conducted.

IIIA 10.3.1 Toxicity exposure ratios**IIIA 10.3.1.1 Acute toxicity exposure ratio (TER_A)****Screening assessment**

The initial acute mammalian screening risk assessment is based on the toxicity value given in Table 10.3-1 and considers the worst-case exposure scenarios for the proposed uses of GF-2626 (Table 10-2). The estimated daily dietary doses (DDD) and associated toxicity exposure ratios (TERs) are presented in the table below (Table 10.3.1.1-1).

Table 10.3.1.1-1: Acute screening risk assessment (TER_A) for mammals from GF-2626 uses

Crop	Indicator mammal	App. rate (kg/ha)	Shortcut value (acute)	MAF	DDD (mg/kg bw)	LD ₅₀ (mg/kg bw)	TER _A [10]
Orchards (pome/stone fruit and citrus), fruiting vegetables, ornamentals	Small herbivorous	0.048	136.4	1.0	6.55	750	115
Leafy vegetables	Small herbivorous	0.024	136.4	1.0	3.27		229
Pulses	Small herbivorous	0.024	136.4	1.2	3.93		190
Potatoes	Small herbivorous	0.024	118.4	1.2	3.41		220

MAF = multiple application factor (MAF for 21 day interval used as a worst-case for uses on pulses and potatoes)

DDD = daily dietary dose

Based on the screening assessment, the TER_A values are greater than the trigger of 10, indicating an acceptable acute risk to mammals from sulfoxaflor following applications of GF-2626 at the proposed label rate.

IIIA 10.3.1.2 Short-term toxicity exposure ratio (TER_{ST})

There is no requirement for the calculation of TER_{ST} for mammals under the EFSA birds and mammals guidance document (EFSA Journal 2009; 7(12): 1438) and, consequently, a risk assessment for short-term toxicity has not been conducted.

IIIA 10.3.1.3 Long-term toxicity exposure ratio (TER_{LT})**Screening assessment**

The initial long-term mammalian screening risk assessment is based on the toxicity value given in Table 10.3-1 and considers the worst-case exposure scenarios for the proposed uses of GF-

2626 (Table 10-2). The estimated daily dietary doses (DDD) and associated toxicity exposure ratios (TERs) are presented in the table below (Table 10.3.1.3-1).

Table 10.3.1.3-1: Long-term screening risk assessment (TER_{LT}) for mammals from GF-2626 uses

Crop	Indicator mammal	App. rate (kg/ha)	Shortcut value (long-term)	f _{TWA}	MAF	DDD (mg/kg bw/day)	NOEL (mg/kg bw/day)	TER _{LT} [5]
Orchards (pome/stone fruit and citrus), fruiting vegetables, ornamentals	Small herbivorous	0.048	72.3	1	1.0	3.47	6.63	1.91
Leafy vegetables	Small herbivorous	0.024	72.3	1	1.0	1.74		3.82
Pulses	Small herbivorous	0.024	72.3	1	1.4	2.43		2.73
Potatoes	Small herbivorous	0.024	48.3	1	1.4	1.62		4.09

f_{TWA} = time weighted average factor. During the EU review (DAR, 2012) it was concluded that due to the short-term effects on pups observed in the mammalian reproduction study from which the endpoint has been derived, the default value of 0.53 cannot be used as a time weighted average factor and that in this case the most appropriate value is 1.

MAF = multiple application factor (MAF for 14 day interval used as a worst-case for uses on pulses and potatoes)

DDD = daily dietary dose

TERs shown in **bold** fall below the relevant trigger

Based on the screening assessment, all TER_{LT} values are lower than the trigger of 5, indicating that concern remains regarding the long-term risk to mammals from sulfoxaflor following application of GF-2626 at the proposed rates in citrus, orchards, fruiting vegetables, ornamentals, brassicas, peas, beans and potatoes.

Therefore, a long-term dietary first tier assessment has been conducted.

First-tier assessment

In the first tier risk assessment generic focal species are selected relevant to the proposed crop and growth stages. The first tier daily dietary doses (DDD) and associated toxicity exposure ratios (TERs) are presented in the table below.

Table 10.3.1.3-2: Long-term first tier risk assessment (TER_{LT}) for mammals from GF-2626 uses

Scenario	Generic focal species	App. rate (kg/ha)	Shortcut value (long-term)	f _{TWA}	MAF	DDD (mg/kg bw/day)	NOEL (mg/kg bw/day)	TER _{LT} [5]
Crop: Fruiting vegetables (BBCH 20-87)								
BBCH 71-89	Rat	0.048	25.2	1	1.0	1.21	6.63	5.48
BBCH > 20	Shrew		1.9			0.09		72.7
BBCH 10-49	Vole		72.3			3.47		1.91
BBCH >50	Vole		21.7			1.04		6.37
BBCH 10-49	Mouse		7.8			0.37		17.7
BBCH > 50	Mouse		2.3			0.11		60.1
Crop: Orchards (pome/stone fruit and citrus) (BBCH 30-85)								
BBCH 20-40	Vole	0.048	43.4	1	1.0	2.08	6.63	3.18
BBCH > 40	Vole		21.7			1.04		6.37
BBCH 71-79	Dormouse		22.7			1.09		6.08
BBCH 20-40	Lagomorph		8.6			0.41		16.1
BBCH > 40	Lagomorph		4.3			0.21		32.1
BBCH 20-40	Mouse		4.7			0.23		29.4
BBCH > 40	Mouse		2.3			0.11		60.1
Crop: Ornamentals (BBCH 12-59)								
To plant	Shrew	0.048	1.9	1	1.0	0.09	6.63	72.7
BBCH 40-49	Vole		72.3			3.47		1.91
BBCH > 50	Vole		36.1			1.73		3.83
BBCH 10-49	Mouse		7.8			0.37		17.7
BBCH > 50	Mouse		3.9			0.19		35.4
Crop: Leafy vegetables (BBCH 20-49)								
BBCH > 20	Shrew	0.024	1.9	1	1.0	0.05	6.63	145
BBCH 40-49	Vole		72.3			1.74		3.82
All season	Lagomorph		14.3			0.34		19.3
BBCH 10-49	Mouse		7.8			0.19		35.4
Crop: Potatoes (BBCH 20-95)								
BBCH > 20	Shrew	0.024	1.9	1	1.4	0.06	6.63	104
BBCH > 40	Vole		21.7			0.73		9.09
BBCH 10-40	Lagomorph		14.3			0.48		13.8

BBCH > 40	Lagomorph		4.3			0.14		45.9
BBCH 10-39	Mouse		7.8			0.26		25.3
BBCH > 40	Mouse		2.3			0.08		85.8
Crop: Pulses (BBCH 40-85)								
BBCH > 20	Shrew		1.9			0.06		104
BBCH 40-49	Vole		72.3			2.43		2.73
BBCH > 50	Vole		21.7			0.73		9.09
BBCH 10-49	Lagomorph	0.024	14.3	1	1.4	0.48	6.63	13.8
BBCH > 50	Lagomorph		4.3			0.14		45.9
BBCH 81-89	Mouse		6.6			0.22		29.9
BBCH 10-49	Mouse		7.8			0.26		25.3
BBCH > 50	Mouse		2.3			0.08		85.8

f_{TWA} = time weighted average factor. During the EU review (DAR, 2012) it was concluded that due to the short-term effects on pups observed in the mammalian reproduction study from which the endpoint has been derived, the f_{TWA} was set to 1.

MAF = multiple application factor (MAF for 21 day interval used as a worst-case for uses on pulses and potatoes)

DDD = daily dietary dose

TER(s) shown in **bold** fall below the relevant trigger

Based on the first tier assessment, the TER_{LT} values are greater than the trigger of 5 for almost all indicator species with the exception of one small herbivorous mammal “vole” scenario for one application between BBCH 20-40 in orchards (pome/stone fruit and citrus), one “vole” scenario for one application between BBCH 10-49 in fruiting vegetables, two “vole” scenarios for applications between BBCH 40-49 and > 50 in ornamentals, one “vole” scenario for one application between BBCH 40-49 in leafy vegetables and pulses for which the TER_{LT} is lower the trigger of 5, indicating that concern remains regarding the long-term risk to voles. Therefore, a long-term dietary refined assessment has been conducted.

zRMS comment:

zRMS considers that, for the present evaluation, the ‘vole’ is not a representative species for the following reasons:

- High fecundity and population recuperation of the vole.
- Primary source of food outside crops fields for the vole.
- Necessity of population control measures since the vole is considered a crop pest when high population levels are reached.

Consequently, voles are actively controlled by intense culturing, catching or by use of biocides/pesticides. In consideration of this, it is obvious that it is not possible to apply the same protection goal to the vole as to the other indicator species. Instead, it is more appropriate to use a lagomorph in combination to a small omnivorous species as representative generic focal species of herbivores.

For Orchards, Leafy vegetables, Potatoes and pulses crops, the TER values for large herbivorous mammals (lagomorphs) exceed the trigger and therefore indicate an acceptable risk to herbivorous mammals according to the proposed uses.

For Fruiting vegetables and Ornamentals, a refined risk assessment for small herbivorous mammals is necessary. Notifier refinement based on deposition factor is considered sufficient to show an acceptable risk to small herbivorous mammals and further considerations for lagomorph are not considered required.

Notifier proposal:

Higher tier long-term mammalian risk assessment

A higher tier long-term assessment is required for the following focal species and scenarios:

- Small herbivorous mammal (“vole”): fruiting vegetables (BBCH 10-49), ornamentals (BBCH 40-49 and BBCH >50), leafy vegetables (BBCH 40-49), pulses (BBCH 10-49) and orchards (pome/stone fruit and citrus) (BBCH 20-40)

The Bird and Mammal guidance (2009) proposes the common vole (*Microtus arvalis*) as the representative herbivorous focal species in orchards, fruiting vegetables, ornamentals, leafy vegetables and pulses. However, this species is not considered to be a representative habitant of these crops, but rather inhabits adjacent landscapes as summarised below:

Habitat of common voles

The preferred primary habitat of common voles is steppe, which comprises grassland, pasture and meadow with mixed grassland, herbs and weeds that provide appropriate cover to avoid predation (Le Louarn & Quere, 2003³). For common voles, many cropped areas are considered to be secondary habitats, and significant invasion into them occurs when there is a population outbreak (Stein, 1958⁴). In contrast to primary habitats, these secondary habitats cannot maintain common vole populations sustainably for long periods owing to the seasonal nature of farming, where populations are regularly disrupted by harvest and tilling (Ognev, 1947⁵; Jacob, 2003⁶).

The optimum habitat of common voles comprises large open, dry, uniform grassy areas (Stein, 1958; Schröpfer & Hildenhagen, 1984⁷).

Stein (1958) who provided one of the first comprehensive reviews of common vole biology distinguished prime habitats such as set-asides, grassy heath land, vegetated margins of ditches and farm tracks from secondary habitats, i.e. arable land. Based on results of more recent studies (e.g. Delattre *et al.* 1992⁸; Butet & Leroux 2001⁹) perennial crop cultivations, e.g. alfalfa and clover

³ Le Louarn, H. and Quere, J.P., Les Rongeurs de France. INRA Editions, Paris, France, 1–256 (2003).

⁴ Stein, G. H. W. 1958. Die Feldmaus (*Microtus arvalis* Pallas). Neue Brehm Bücherei Bd. 225 A. Ziemsen Verlag, Wittenberg Lutherstadt.

⁵ Ognev, S.J., The Mammals of the USSR and Adjacent Countries. Nauka, Moscow, USSR, 685 pp. (1947)

⁶ Jacob, J., Short-term effects of farming practices on populations of common voles. Agric Ecosyst Environ 95(1):321–325 (2003).

⁷ Schröpfer, R. & Hildenhagen, U. 1984. Die Säugetiere Westfalens. Feldmaus - *Microtus arvalis* (Pallas, 1779). Abhandlungen aus dem Westfälischen Museum für Naturkunde, 46(4): 204-215.

⁸ Delattre, P.; Giraudoux, P.; Baudry, J.; Musard, P.; Toussaint, M.; Truchetet, D.; Stahl, P.; Poule, M. L.; Artois, M.; Damange, P. & Quere, J.-P. 1992. Land use patterns and types of common vole (*Microtus arvalis*) population kinetics. Agriculture, Ecosystems and Environment 39: 153-169.

should be included as prime habitats. The prime habitats that generally are of smaller scale compared to surrounding secondary habitats are essential for the survival of local populations and serve as donor habitats for secondary habitats in years of mass occurrences in the prime habitats. Secondary habitats are characterized by periods of immigration of voles during mass occurrences (from prime habitats) and multi-annual periods of (almost) complete non-existence.

In a comprehensive field study in France (Delattre *et al.*, 1992) have categorised the population kinetics of common voles in dependence of agricultural land use. They stress the importance of permanent grassland in farmland for the population dynamics of common voles.

If grassland cover diminished so did populations of common voles and on the inverse an increase in grassland was followed by an enhancement of vole populations. Besides the proportion of permanent grassland in farmland, the existence of a highly connected grassy network along ditches, roads, tracks etc. abundantly and permanently covered with vegetation is a key factor for the occurrence of common voles.

In the eastern French department of Jura a two-year field study covering 18000 ha on the population dynamics of common voles has been conducted in different landscape types (Delattre *et al.* 1996¹⁰). Highest vole abundances were found on permanent grassland. Here mass occurrences of common voles are favoured.

In a nine-year field study in eastern France on rodent communities on abandoned agricultural land 11,624 rodents of 8 species were caught in a landscape consisting of forests and grassland with a proportion of less than 1% ploughed land. *Microtus arvalis* was the most common species. The conversion of agricultural land into permanent grassland resulted in a marked increase in populations of common voles (Giraudoux *et al.* 1994¹¹).

In a multi-annual field-study in Germany a total of 1,421 common voles were caught of which 7.1% were in sugar beets and cabbage, 13.9% in cereals, and 79% in an adjacent grassy ditch (Boye, 2000¹²).

Based on the results of a field study in an IPM apple orchard in Poland *Microtus arvalis* was the dominant rodent species with a proportion of 70% to 90% of the rodent population. During all seasons the least number of rodent colonies was found on plots with herbicidal weeding while the highest abundance was observed on those study plots with herbaceous plant cover not cut until autumn. Cutting the plant cover during summer reduced the numbers of voles to a level

⁹⁾ Butet, A. & Leroux, A. B. A. 2001. Effects of agriculture development on vole dynamics and conservation of Montagu's harrier in western French wetlands. *Biological Conservation* 100: 289-295.

¹⁰⁾ Delattre, P., Giraudoux, P., Baudry, J., Quéré, J. P. & Fichet, E. 1996. Effect of landscape structure on common vole (*Microtus arvalis*) distribution and abundance at several space scales. *Landscape Ecology* 11(5): 279-288.

¹¹⁾ Giraudoux, P., P. Delattre, J.-P. Quere, and P. Damange. 1994. Structure and kinetics of rodent populations, in a region under agricultural land abandonment. *Acta Ecologica* 15: 385-400.

¹²⁾ Boye, P. 2000. Populationsökologische Untersuchungen an Nagetieren in der Agrarlandschaft bei Bonn. PhD-Study. University of Rostock, Rostock.

comparable on plots with herbicidal weeding (Jaworska *et al.*, 1995¹³). This study again demonstrates the dependency of common voles on a permanent and undisturbed vegetation cover.

Refinements of the TER_{LT} calculation

Interception factor

This refinement is based on interception which was not considered in the first tier risk assessment. Worst case deposition factors (DFs) in line with the Generic Guidance for Tier 1 FOCUS Ground Water Assessments (2012) are used in the following refined risk assessment.

In the first tier risk assessment for small herbivorous mammals for the scenarios “orchards, BBCH 20-40”, “fruiting vegetables, BBCH 10-49”, “leafy vegetables, BBCH 40-49”, “ornamentals, BBCH 40-49” and “pulses, BBCH 40-49” the DFs incorporated in the short-cut value for long-term exposure are all 1 (see Appendix A, EFSA 2009) assuming no interception at these growth stages, except for orchards at BBCH 20-40 and BBCH ≥ 50 for which a DF of 0.6 and 0.5 is used and for the scenario “ornamentals, BBCH ≥ 50 ” the DF incorporated in the short-cut value for long-term exposure is 0.5 assuming 50% interception at this growth stage. However, in line with the Generic Guidance for Tier 1 FOCUS Ground Water Assessments (2012), minimum interception by citrus at BBCH 30-85 is assumed to be 70%, interception by pome/stone fruit at BBCH 51-85 is assumed to be 65%, , interception by fruiting vegetables at BBCH 20-87 is assumed to be 70%, interception by leafy vegetables at BBCH 20-49 is assumed to be 40%, interception by ornamentals at BBCH 12-59 is assumed to be 65% and interception by beans/peas at BBCH 40-85 is assumed to be 70%. Therefore, the refined long-term TERs are presented below (Table 10.3.1.3-3) using a deposition factor (DF) of 0.30, 0.35 0.30, 0.60, 0.35 and 0.30, respectively.

Calculated high tier long-term TERs for voles

Based on the DF values discussed in the above section the refined long-term TER values for the vole are provided in Table 10.3.1.3-3 below.

¹³ Jaworska, K., F. Polensy, W. Muller, and R. W. Olszak. 1995. The cover of herbaceous plants in an IPM apple orchard and its influence on the occurrence of rodents. *Acta Horticulturae* 422:431-432.

Table 10.3.1.3-3: Higher tier risk assessment (TER_{LT}) for small herbivorous mammal “vole”

Scenario	FIR/bw	RUD (long-term)	DF	MAF	f _{TWA}	DDD (mg/kg bw/day)	Endpoint (mg/kg bw)	TER _{LT} [5]
Application rate: 0.048 kg/ha								
Orchards (citrus) BBCH 20-40	1.33	54.2	0.30	1.0	1	1.04	6.63	6.39
Orchards (Pome/stone fruit) BBCH 20-40	1.33	54.2	0.35	1.0	1	1.21		5.47
Fruiting vegetables BBCH 10-49	1.33	54.2	0.30	1.0	1	1.04		6.39
Ornamentals BBCH 40-49 and BBCH ≥50	1.33	54.2	0.35	1.0	1	1.21		5.47
Application rate: 0.024 kg/ha								
Leafy vegetables BBCH 40-49	1.33	54.2	0.60	1.0	1	1.04	6.63	6.39
Pulses BBCH 40-49	1.33	54.2	0.30	1.4	1	0.73		9.12

f_{TWA} = time weighted average factor. During the EU review (DAR, 2012) it was concluded that due to the short-term effects on pups observed in the mammalian reproduction study from which the endpoint has been derived, the f_{TWA} was set to 1.

MAF = multiple application factor (MAF for 21 day interval used as a worst-case for uses on pulses)

DDD = daily dietary dose

DF = deposition factor (from FOCUS, 2012)

The above refined assessment demonstrates an acceptable long-term risk to small herbivorous mammals “voles” from the proposed uses of GF-2626 in fruiting vegetables, ornamentals, brassicas, peas, beans and citrus even under the worst case unrealistic assumption that a vole is obtaining 100% of its diet from these crops.

Metabolites

In accordance with the EFSA guidance document, the risk to mammals from metabolites formed in plants and vertebrate compartments has to be considered.

Mammals can be exposed *via* diet to environmental metabolites of sulfoxaflor, particularly from metabolites formed in plant matter tissues, insects, soil organisms or combinations thereof. There are two major metabolites formed in plant tissue: X11719474 and X11721061, and two major soil metabolites: X11719474 and X11519540.

Metabolite X11719474: The acute oral LD₅₀ of X11719474 in rats was determined to be > 5000 mg/kg bw. The acute oral toxicity of sulfoxaflor in rats was 1000 mg/kg bw and in mice was 750 mg a.s./kg bw. Regarding long-term effects, a number of mammalian studies have been conducted on X11719474. Most relevant to the evaluation for wild mammals are the rat reproduction screening test and the rat development toxicity study. In the rat reproduction screening test, the NOAEL for reproduction and developmental toxicity was 162 mg/kg bw/day, based on a weak treatment effect at PND1 and 4 at the highest dose tested - lowered pup survival that is outside concurrent and (revised) historical control data. In the rat developmental toxicity study, the NOAEL was 368 mg/kg bw/d, the highest level tested. There were no effects on neonatal survival or developmental alterations. Thus, X11719474 exhibits substantially less toxicity than parent sulfoxaflor and the mammalian risk assessment for X11719474 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Metabolite X11519540: The acute oral LD₅₀ of X11519540 in rats was determined to be 566 mg/kg bw. The acute oral toxicity of sulfoxaflor in rats was 1000 mg/kg bw and in mice was 750 mg a.s./kg bw. As the acute oral endpoints for X11519540 and the parent are within a factor of 2 (the trigger value for which endpoints are considered to be relevant in line with the Guidance Document on the Assessment of the Equivalence of Technical Materials of Substances Regulated under Regulation (EC) No. 1107/2009¹⁴) these two compounds are considered to be of comparable toxicity. Thus, the mammalian risk assessment for X11519540 may be based upon the results of the risk assessment for the parent sulfoxaflor.

The relative extent of potential formation of X11519540 in plants is approximately equivalent to the extent of formation in mammals (goat metabolism study). In soil, because of the low bioaccumulation potential of X11519540 (log K_{ow} = 0.7), the relative extent of formation of X11519540 in mammalian studies on the parent are likely to be representative of long-term exposures potentially occurring in soil organisms. Therefore, the long-term toxicity of X11519540 can be considered to be accounted for by the toxicity studies in mammals of the parent material sulfoxaflor and the long-term mammalian risk assessment for X11519540 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Metabolite X11721061: The extent of potential formation of metabolite X11721061 in plants, when considering the summed contribution of plant conjugates of X11721061 with that of free X11721061, substantially exceeds that observed in mammals and birds. Therefore, like X11719474, an acute oral toxicity study in rats was conducted to compare the relative potency of the metabolite to that of the parent. The acute oral LD₅₀ of X11721061 in rats was determined to be 2000 mg/kg bw. The acute oral toxicity of sulfoxaflor in rats was 1000 mg/kg bw and in mice was 750 mg a.s./kg bw. Thus, X11721061 exhibits substantially less toxicity than parent sulfoxaflor and the mammalian acute risk assessment for X11721061 may be based upon the results of the risk assessment for the parent sulfoxaflor.

Drinking water assessment

¹⁴ SANCO/10597/2003, 2012

The EFSA Bird and Mammal Guidance Document (EFSA Journal 2009; 7(12):1438) proposes an assessment methodology for the risk to mammals from active substances in drinking water using a small granivorous mammal as an indicator species. The relevant scenario for mammals is the puddle scenario which assumes a mammal taking drinking water from water on the soil surface after a heavy rainfall event follows application of the product.

Due to the characteristics of the exposure scenario in connection with the standard assumptions for water uptake by animals, no specific calculations of exposure and TER are necessary since the ratio of effective application rate (in g/ha) to acute and long-term endpoint (in mg/kg bw/d) does not exceed 50 in the case of less sorptive substances ($K_{oc} < 500$ L/kg) or 3000 in the case of more sorptive substances ($K_{oc} \geq 500$ L/kg).

Sulfoxaflor has a K_{oc} of 14 - 35 L/kg. The proposed worst-case rate of use of GF-2626 is a 1 x 0.048 kg a.s./ha. The ratios of effective application rate to relevant endpoints are presented in the following table.

Table 10.3.1.3-4: Screening step for drinking water assessment– ratio of application rate to relevant endpoint for mammals

Substance	Koc (L/kg)	Application rate (g a.s./ha)	Toxicity endpoint (mg a.s./kg bw)	Ratio	Trigger
Sulfoxaflor	14 - 35	48	Acute: 750	0.06	50
			Long-term: 6.63	7.24	

The ratios for acute and reproductive endpoints for sulfoxaflor do not exceed the threshold value of 50. Thus, no specific calculations of exposure for mammals through drinking water are necessary. In conclusion, the risk through exposure *via* drinking water from the intended uses of GF-2626 is acceptable.

IIIA 10.3.2 Other studies

IIIA 10.3.2.1 Acute oral toxicity of the preparation

The following acute rat oral toxicity study performed on GF-2032 was assessed in the EU review and is available in the DAR (2013) Annex B.6.

Acute toxicity studies have not been conducted on GF-2626 on the basis of animal welfare. It is possible to bridge from a similar formulation, GF-2032, which is a suspension concentrate (SC) containing 240 g/L sulfoxaflor. The nominal compositions of GF-2626 and GF-2032 are considered similar enough to allow GF-2032 acute toxicity data to be used as a surrogate in the absence of GF-2626. Because the concentration of sulfoxaflor in GF-2032 is double that in GF-2626, it can be considered a worst-case scenario. The comparison of both products can be seen in Part C, Confidential Information.

Report:	IIIA 10.3.2.1/01, [REDACTED] (2008)
Title:	Acute Oral toxic class method in Rats.
Document No:	Dow Study ID: 080048
Guidelines:	OPPTS 870.1200, OECD 402
GLP	Yes

Study Comments: IIIA 10.3.2.1/01	Already reviewed in the EU DAR for Sulfoxaflor.
Agreed Endpoints: IIIA 10.3.2.1/01	LD ₅₀ > 5000 mg GF-2032 /kg of body weight.

IIIA 10.3.2.2 Acceptance of bait, granules or treated seed (palatability testing)

GF-2626 is not formulated as a bait, granule or as treated seeds and, consequently, studies to determine palatability are not applicable.

IIIA 10.3.2.3 Effects of secondary poisoning

The EFSA birds and mammals guidance document (EFSA Journal 2009; 7(12): 1438) states that a $\log K_{ow} \geq 3$ is used to indicate that there might be a potential for bioaccumulation (see Section 5.6 Bioaccumulation and food chain behaviour). Sulfoxaflor has a $\log K_{ow}$ value of 0.802 (at pH 7), indicating a low potential for bioaccumulation in earthworm and fish tissues. Risk assessments for mammals feeding on fish and earthworms are not necessary for this active substance and have not been conducted.

IIIA 10.3.3 Supervised cage or field trials

Supervised cage/field trials with the formulation were not performed, since an acceptable risk to mammals indicates that further studies are not required.

IIIA 10.4 Effects on Bees

Overall summary

GF-2626 was one of the representative formulations in the EU review of sulfoxaflor. However new risk assessment parameters are now considered in the assessment of risk to bees and hence an appropriate risk assessment with the proposed use pattern is provided and is considered adequate. The risk assessment has been conducted in line with the Guidance Document on Terrestrial Ecotoxicology (SANCO/10329/2002 rev. 2 final).

The critical endpoints employed in the risk assessment for bees are indicated in Tables 10.4-1 to 10.4-3.

Table 10.4-1: EU Endpoints - Toxicity of sulfoxaflor and its metabolites to honeybees

Compound	Test species	Endpoint	EU agreed endpoints*
			Value (µg/bee)
Sulfoxaflor	<i>Apis mellifera</i>	Acute oral LD ₅₀	0.146
Sulfoxaflor	<i>Apis mellifera</i>	Acute contact LD ₅₀	0.379
X11719474	<i>Apis mellifera</i>	Acute oral LD ₅₀	> 100
X11519540	<i>Apis mellifera</i>	Acute oral LD ₅₀	> 91.2
X11579457	<i>Apis mellifera</i>	Acute oral LD ₅₀	45.7
X11721061	<i>Apis mellifera</i>	Acute oral LD ₅₀	> 103.5
GF-2032	<i>Bombus terrestris</i>	Acute oral LD ₅₀	0.027 (a.s.)
GF-2032	<i>Bombus terrestris</i>	Acute oral LD ₅₀	7.554 (a.s.)

* EFSA Journal 2014; 12(5):3692

Table 10.4-2: EU Endpoints - Toxicity of GF-2626 to honeybees

Compound	Test species	Endpoint	EU agreed endpoints*
			Value (µg a.s./bee)
GF-2626	<i>Apis mellifera</i>	Acute oral LD ₅₀	0.065
		Acute contact LD ₅₀	0.283

* EFSA Journal 2014; 12(5):3692

Table 10.4-3 EU Endpoints - semi-field tests

Test substance (location)	Study treatments	Findings	Reference *
GF-2626 (Germany)	Pre-flowering without bees: 1) 48 g a.s./ha Evening application after bee flight: 1) 24 g a.s./ha 2) 48 g a.s./ha Daytime application during bee flight: 1) 24 g a.s./ha	Negative effects on adult mortality: in evening application 24 g a.s./ha on day 0, in evening application 48 g a.s./ha on day 0-1, in daytime application on day 0-1. Negative effects on foraging activity: in evening application 48 g a.s./ha on day 0-2, in daytime application on day 0-1. Negative effects on bee brood cannot be excluded.	Schmitzer (2011a)
GF-2626 (Germany)	Pre-flowering without bees: 1) 48 g a.s./ha Evening application after bee flight: 1) 24 g a.s./ha Daytime application during bee flight: 1) 24 g a.s./ha	Negative effects on adult mortality: in evening application on day 0, in daytime application on day 0-1. Negative effects on foraging activity: in daytime application on day 0-1. Negative effects on bee brood cannot be excluded.	Schmitzer (2011b)

* EFSA Journal 2014; 12(5):3692

Both the active substance and formulation data have been used to calculate hazard quotients (HQs). A summary of the proposed GAP for GF-2626 is provided in Table 10-2. The maximum proposed rate of use (equivalent to 48 g a.s./ha) has been considered in the following risk assessment.

IIIA 10.4.1 Hazard quotients for bees

IIIA 10.4.1.1 Oral exposure Q_{HO}

The acute oral risk assessment for honeybees is summarised in the table below.

Table 10.4.1.1-1: Acute oral risk to bees from exposure to sulfoxaflor, metabolites and GF-2626

Test species	Test substance	Application rate (g a.s./ha)	LD ₅₀ (µg a.s./bee)	Q _{HO}
Honeybee	GF-2626	48	0.065	738
Honeybee	Sulfoxaflor		0.146	329
Honeybee	X11719474*		> 100	< 0.48
Honeybee	X11519540*		> 91.2	< 0.53
Honeybee	X11579457*		45.7	1.05
Honeybee	X11721061*		> 103.5	< 0.46

HQs shown in bold are above the relevant trigger

*Risk assessment conducted assuming 100% formation of metabolites as a worst-case approach

The above calculated oral hazard quotients for sulfoxaflor and GF-2626 are above the trigger of 50 indicating the need for a refined risk assessment.

The hazard quotients for all metabolites are less than the trigger of 50, indicating that all metabolites of sulfoxaflor pose an acceptable acute oral risk to bees.

IIIA 10.4.1.2 Contact exposure Q_{HC}

The acute contact risk assessment for honeybees is summarised in the table below.

Table 10.4.1.2-1: Acute contact risk to bees from exposure to sulfoxaflor and GF-2626

Test species	Test substance	Application rate (g a.s./ha)	LD ₅₀ (µg a.s./bee)	Q _{HC}
Honeybee	GF-2626	48	0.283	170
Honeybee	Sulfoxaflor		0.379	127

HQs shown in **bold** are above the relevant trigger

The above calculated contact hazard quotients for sulfoxaflor and GF-2626 are above the trigger of 50 indicating the need for a refined risk assessment.

Refined risk assessment (oral and contact exposure)

The first tier risk assessments demonstrate a potential acute risk to honeybees *via* oral and contact exposure following the proposed uses of GF-2626. Therefore, higher tier studies should be taken into consideration. A foliar residue contact laboratory study with the similar SC formulation GF-2032 (IIIA 10.4.3/01) and semi-field studies with GF-2626 (IIIA 10.4.7/01 to 10.4.7/03) are available. The available studies were all GLP compliant and conducted in line with standard guidelines.

Foliar residues contact laboratory study

The EFSA Conclusion (2014) states that *“The results of foliage residue contact laboratory test indicated that mortality is not expected when bees are exposed to dry residues (aged residues) on over sprayed foliage.”* In this study, the toxicity of GF-2032 residues on foliage to honeybees was assessed in a 24 hour study. Bees were exposed to alfalfa foliage sprayed with GF-2032 at a nominal rate of 200 g a.s./ha. The residues were allowed to weather in the field for 3, 6 and 24 hours before being placed in cages and the bees exposed in the laboratory. Contact time for the bees was 24 hours. No significant adverse effects on the bees were observed after exposure to foliar residues from application at a rate of 200 g a.s./ha, after ageing for 3, 6 or 24 hours. As this rate is over x4 the proposed maximum application rate (48 g a.s./ha), this study clearly demonstrates an acceptable risk to bees from contact exposure following the proposed uses of GF-2626.

Semi-field data

However, the EFSA Conclusion (2014) also states that *“increased mortality was observed in the tunnel tests when sulfoxaflor was applied on flowering Phacelia during bee flight, and also when the application was in the previous evening (after bee flight). The increase in mortality was only apparent on the day of the application or on the following day. Potential adverse effects on bee brood could not be excluded from the available data and assessment.”*

Further information is given on this in the DAR (2013), which states that; *“In two of the studies detailed assessments on brood following OECD 75 guideline and on colony condition and strength were made up to approximately 4 weeks after exposure. No adverse impacts on colony health or performance were noted between the control colonies and those exposed to applications of sulfoxaflor at any of the treatments tested, except for the parameter of brood termination rate with rather questionable results.”*

The results for brood termination rate were concluded to be questionable due to the relatively high loss of eggs in the control, high variability in the brood termination rate among individual replicates and poor statistical power of these measures.

Therefore, the results in terms of mortality and brood termination rate from each of the three semi-field studies have been considered in further detail below.

I) Schmitzer (2011a); IIIA 10.4.7/01

This study assessed the effects of GF-2626 on honeybee colonies, including brood development, when bees were enclosed within tunnels containing *Phacelia tana cetifolia* for 7 to 10 days. Observations then continued for up to 27 days after application. The following scenarios were assessed:

- 48 g a.s./ha - pre-flowering
- 24 and 48 g a.s./ha - evening application after bee flight
- 24 g a.s./ha - during bee flight

Only the first two scenarios will be focused on here, as GF-2626 is not proposed for use when bees are actively foraging. With regards mortality of worker bees the following results were found (refer to Table IIIA 10.4.7/01-2 for full details):

48 g a.s./ha before flowering:

No statistically significant differences in mortality compared to control up to day 7 a.a., statistically significant differences on day 9 a.a. (mean mortality of 0.0 and 6.0 in the control and treatment group, respectively) and also in mean days 8 to 27 a.a. (mean mortality of 2.2 and 3.53 bees in the control and treatment group, respectively) and mean days 0 to 27 a.a. (mean mortality of 7.1 and 10.9 bees in the control and treatment group, respectively).

24 g a.s./ha evening application after bee flight:

Statistically significant differences in mortality compared to control on day 0 (mean mortality of 17.3 and 79.3 in the control and treatment group, respectively) and on day 9 a.a. (mean mortality of 0.0 and 3.3 in the control and treatment group, respectively).

48 g a.s./ha evening application after bee flight:

Statistically significant differences in mortality compared to control on day 0 (mean mortality of 17.3 and 113.7 in the control and treatment group, respectively), on day 1 a.a. (mean mortality of 9.7 and 39.0 in the control and treatment group, respectively), on day 9 a.a. (mean mortality of 0.0 and 3.3 in the control and treatment group, respectively), on day 16 a.a. (mean mortality of 0.7 and 7.0 in the control and treatment group, respectively) and also in mean days 8 to 27 a.a. (mean mortality of 2.2 and 4.27 in the control and treatment group, respectively).

Although, there were some statistically significant effects observed, these levels of mortality were generally very low, falling within the range of the mean mortality observed pre-treatment in all test groups (8.3 to 31.7 bees) and within the mean mortality observed in the control group from day 0 to 27 a.a. (0.0 to 33.3 bees). Only mortality in the 24 and 48 g a.s./ha (after bee flight) treatment groups at day 0 were out-with these ranges (mean mortality of 79.3 and 113.7 bees). However, this mortality is still low, especially when the size of the colonies are considered; mean number of bees per colony in the six treatment groups one day before application was 2610 to 3600 per colony. Overall, these levels of mortality can be concluded not to be ecologically relevant.

With regards to effects on the brood termination rate, following the assessment of single cells from the egg stage to successfully hatched worker bees, the mean termination rate in the control was 56.39%. It was considered in the DAR (2013) that the surrounding conditions where colonies were exposed during such a trial lead to this relatively high number of loss of eggs. The reason for this was thought to be the artificial housing, colony size and limited space of the colonies as well as weather conditions.

The brood termination rate was similar in the test groups; 48 g a.s./ha pre-flowering (58.06%) and 24 and 48 g a.s./ha in the evening (70.56 and 47.22%, respectively). Refer to Table IIIA 10.4.7/01-8 for further details. There were no statistically significant differences in brood termination rate in any test item group compared to the control.

II) Schmitzer (2011b); IIIA 10.4.7/02

This study assessed the effects of GF-2626 on honeybee colonies, including brood development, when bees were enclosed within tunnels containing *Phacelia tana cetifolia* for 7 to 10 days. Observations then continued for up to 27 days after application. The following scenarios were assessed:

- 48 g a.s./ha - pre-flowering
- 24 g a.s./ha - evening application after bee flight
- 24 g a.s./ha - during bee flight

Only the first two scenarios will be focused on here, as GF-2626 is not proposed for use when bees are actively foraging. With regards mortality of worker bees the following results were found (refer to Table IIIA 10.4.7/02-2 for full details):

48 g a.s./ha before flowering:

Statistically significant differences in mortality compared to the control on day 9 a.a. (mean mortality of 1.7 and 8.7 in the control and treatment group, respectively) and also in mean days 0 to 7 a.a. (mean mortality of 20.4 and 29.17 in the control and treatment group, respectively)

24 g a.s./ha evening application after bee flight:

Statistically significant differences in mortality compared to the control on day 0 (mean mortality of 26.7 and 81.7 in the control and treatment group, respectively) and on day 12 a.a. (mean mortality of 0.0 and 3.3 in the control and treatment group, respectively).

Although there were some statistically significant effects observed, these levels of mortality were generally very low and comparable to the range of mean mortality observed pre-treatment in all test groups (6.0 to 24.7 bees) and within the mean mortality observed in the control group from day 0 to 27 a.a. (0.0 to 43.7 bees). Only mortality in the 24 g a.s./ha (after bee flight) treatment group at day 0 was out-with these ranges (mean mortality of 81.7 bees). However, this mortality is still low, especially when the size of the colonies are considered; mean number of bees per colony in the six treatment groups one day before application was 2460 to 3300 per colony. Overall, these levels of mortality can be concluded not to be ecologically relevant.

With regards effects on the brood termination rate, following the assessment of single cells from the egg stage to successfully hatched worker bees, the mean termination rate in the control was 65.28%. It was considered in the DAR (2013) that the surrounding conditions where colonies were exposed during such a trial lead to this relatively high number of loss of eggs. The reason for this was thought to be the artificial housing, colony size and limited space of the colonies as well as weather conditions.

The brood termination rate was similar or lower in the test groups; 48 g a.s./ha pre-flowering (65.56%) and 24 g a.s./ha in the evening (44.17%). There were no statistically significant differences in brood termination rate in any test item group compared to the control.

III) Schmitzer (2011c); IIIA 10.4.7/03

As this study only assessed daytime application during bee flight is has not been considered here. Furthermore, the reduced amount of brood stages in bee colonies, because of the progressed season, limits the utility of the study for evaluation of effects of the test substance on bee brood.

zRMS comment:

Based on semi-field studies, significant mortality on bees are observed at maximum rate of 48 g a.s./ha after bee flight and before flowering. The increase in mortality was only apparent on the day of the application or on the following day. Potential adverse effects on bee brood could also not be excluded from the available data and assessments.

Furthermore, a higher oral toxicity is observed with the similar formulation GF-2032 on bumble bee (0.027 µg a.s./bee) than on honey bee (0.146 µg a.s./bee). This indicates a possible higher sensibility of other pollinisators as bumble bees to sulfoxaflor.

The crop species in the GAP for GF-2626 include pome/stone fruits, fruiting vegetables, beans, leafy vegetables, potatoes, pulses and ornamentals. They are considered attractive for bees during flowering for both pollen and nectar.

Therefore, a position paper based on a study has been provided by the notifier during the reviewing of GF-2626 by Czech Republic for central zone (summaries presented below). zRMS France choose to take into account those informations in the refined risk for bees. According to central zone assessment:

“The position paper is mainly based on the semi-field study by Liepold (2011; IIIA 10.4.7/04; not evaluated in EU review) which investigated the residues of sulfoxaflor, and the main plant metabolite X11719474, in pollen, nectar and plants following application to *Phacelia*. GF-2626 was applied at 24 and 48 g a.s./ha (T1 and T2) before the onset of flowering (BBCH 58) in three replicate tunnels. In separate tunnels GF-2626 was applied at 24 and 48 g a.s./ha (T3 and T4) during flowering (BBCH 64) and honey bee foraging. In order to evaluate the magnitude of residues of the test item GF-2626 and metabolite X11719474, nectar stomachs from forager bees, pollen samples from pollen traps and plants of *Phacelia* were taken for analysis. Samples were taken on day 0 after the application and on days +5 and +6.

The results showed that, when applications of GF-2626 at 24 and 48 g a.s./ha were made 5 days before flowering, residues of sulfoxaflor and X11719474 were not detectable or were below the LOQ in pollen and nectar samples taken during full flowering. Additionally, following applications of GF-2626 during flowering, low levels of sulfoxaflor and X11719474 were present in nectar (maximum of 0.0889 mg/kg of sulfoxaflor), and these levels rapidly declined to be below the level of quantification in nectar at 6 days after application. In pollen, levels were slightly higher (maximum of 0.809 mg/kg) but also declined rapidly to 0.0325 mg/kg, when applied at 48 g a.s./ha. From this study it can be concluded that residues of sulfoxaflor are not persistent in plant material, and that honey bees will not be exposed to residues of sulfoxaflor in pollen and nectar following pre-flowering applications.”

It is concluded that the risk to honeybees is acceptable when the product is applied before flowering. Pre-flowering application made 5 days before flowering is considered sufficiently protective by zRMS. The following mitigation measure must be applied: Do not use where bees are actively foraging/ Do not apply 5 days before and during flowering.

Therefore, considering flowering plants other than crops, a mitigation measure is considered needed: “Do not apply when flowering weeds are present”

Finally, no information has been provided concerning the honeydew production and the possible way of transfert and exposure of Sulfoxaflor to bees. Then the following mitigation measure must be applied for all intended uses: “To protect bees and pollinating insects do not apply to crop plants when in flower or during the honeydew production period”.

This conclusion is considered conservative for bumble bees.

It is noted, that according to Regulation (EU) 2015/1295, the Notifier shall submit confirmatory information as regards: (a) the risk to honey bees via the different routes of exposure, in particular nectar, pollen, guttation fluid and dust; (b) risk to honey bees foraging in nectar or pollen in succeeding crops and flowering weeds; (c) the risk to pollinators other than honey bees; (d) the risk to bee brood. This information should be submitted by 18 August 2017

IIIA 10.4.2 Acute toxicity of the formulation to bees

IIIA 10.4.2.1 Oral

The following acute oral toxicity study with the honeybee performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.4.2.1/01, Vinall, S. (2010a)
Title:	Laboratory bioassay to determine the acute oral toxicity of GF-2626 to the honeybee, <i>Apis mellifera</i> .
Document No:	Dow Study ID: 10-11
Guidelines:	OECD 213
GLP	Yes

Study Comments: IIIA 10.4.2.1/01	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints: IIIA 10.4.2.1/01	48-hour oral LD ₅₀ = 0.539 µg GF-2626/bee (equivalent to 0.065 µg Sulfoxaflor/bee)

IIIA 10.4.2.2 Contact

The following acute contact toxicity study with the honeybee performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.4.2.2/01, Vinall, S. (2010b)
Title:	Laboratory bioassay to determine the acute contact toxicity of GF-2626 to the honeybee, <i>Apis mellifera</i> .
Document No:	Dow Study ID: 10-10
Guidelines:	OECD 214
GLP	Yes

Study Comments: IIIA 10.4.2.2/01	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints: IIIA 10.4.2.2/01	48-hour contact LD ₅₀ = 2.356 µg GF-2626/bee (equivalent to 0.283 µg Sulfoxaflor/bee)

IIIA 10.4.3 Effects on bees of residues on crops

The following toxicity of residues on foliage to the Honeybee performed on GF-2032 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.4.3/01, Lee, B. (2008)
Title:	GF-2032: Toxicity of Residues on Foliage to the Honeybee, <i>Apis mellifera</i> .
Document No:	Dow Study ID: 080082
Guidelines:	U.S. EPA FIFRA Subdivision L, Section 141-2 U.S. EPA OPPTS Guideline 850.3030
GLP	Yes

Study Comments: IIIA 10.4.3./01	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints:	No significant adverse effects to bees when exposed to foliar residues of GF-2032 treated 3, 6 or 24 hours previously at 200 g Sulfoxaflor/ha, were

IIIA 10.4. 3./01	determined
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IIIA 10.4.4 Cage tests

No data submitted.

IIIA 10.4.5 Field tests

No data submitted.

IIIA 10.4.6 Investigation into special effects

IIIA 10.4.6.1 Larval toxicity

No data submitted.

IIIA 10.4.6.2 Long residual effects

No data submitted.

IIIA 10.4.6.3 Disorienting effects on bees

No data submitted.

IIIA 10.4.7 Tunnel tests

The following toxicity of field tests with honeybee performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.4.7/01, Schmitzer, S (2011a)
Title:	Study on the Effect of GF-2626 on Honey Bee Brood (<i>Apis mellifera</i> L.) under Semi-Field Conditions - Tunnel Test.
Document No:	Dow Study ID: 80755
Guidelines:	OEPP/EPPO guideline No. 170 (3) (OEPP/EPPO, 2001) OECD No. 75 ENV/JM/MONO(2007)22.
GLP	Yes

Study Comments: IIIA 10.4.7/01	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints: IIIA 10.4. 7./01	The potential effects of GF-2626 on honey bee colonies including brood development was assessed by exposing honey bees under the realistic but severe conditions of a semi-field (tunnel) test. For honey bees and colonies exposed to pre-flower treatment with 48 g sulfoxaflor/ha, to dried residues applied at 24 and 48 g sulfoxaflor/ha after

	<p>bee flight and to direct exposure to 24 g sulfoxaflor/ha, no effects on mortality, flight intensity and behaviour were observed. Although significant effect on worker bee mortality on day 0 after application were observed in the 24 and 48 g a.s./ha after bee flight group and in the 24 g a.s./ha during bee flight group. In the 48 g a.s./ha after bee flight group and 24 g a.s./ha during bee flight group, the negative effects on mortality were observed also on the following day (day 1 a.a.). In these two test groups, significant effects on foraging activity were noticed on day 0 after application, observed also on days 1 and 2 a.a. in the 48 g a.s./ha after bee flight group and on day 1 a.a. in the 24 g a.s./ha during bee flight group.</p> <p>No effects on colony development, colony strength or bee brood were observed after exposure of the bees to pre-flower treatment with 48 g sulfoxaflor/ha, to dried residues applied at 48 g sulfoxaflor/ha after bee flight and to direct exposure to 24 g sulfoxaflor/ha. Following the application of 24 g sulfoxaflor/ha after the bee flight, brood termination rate of the bee colonies was higher compared to the control. Since this was not obvious in the higher rate with 48 g sulfoxaflor/ha and after direct application to the bees to 24 g sulfoxaflor/ha, this must be seen as not a test item related effect.</p> <p>No significant negative effects on pupae mortality, colony condition, colony strength and brood compensation index were noticed in any test item group compared to control.</p> <p>Clear adverse effects were observed in the reference item treated colonies (Insegar (300 g fenoxycarb/ha).</p> <p>No adverse effect on the overall survival of the colonies could be observed after application of GF-2626 at all rates and treatment scenarios.</p>
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Report:	IIIA 10.4.7/02, Schmitzer, S (2011b)
Title:	Study on the Effect of GF-2626 on Honey Bees and their Brood (<i>Apis mellifera</i> L.) under Semi-Field Conditions - Tunnel Test.
Document No:	Dow Study ID: 101599
Guidelines:	OEPP/EPPO guideline No. 170 (3) (OEPP/EPPO, 2001) OECD No. 75 ENV/JM/MONO(2007)22.
GLP	Yes

Study Comments: IIIA 10.4.7./01	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints: IIIA 10.4. 7./01	<p>The potential effects of GF-2626 on honey bee colonies including brood development was assessed by exposing honey bees under the realistic but severe conditions of a semi-field (tunnel) test.</p> <p>For honey bees and colonies exposed to pre-flower treatment with 48 g</p>

	<p>sulfoxaflor/ha, to dried residues applied at 24 and 48 g sulfoxaflor/ha after bee flight and to direct exposure to 24 g sulfoxaflor/ha, no effects on mortality, flight intensity and behaviour were observed. Although significant effect on worker bee mortality on day 0 after application were observed in the 24 and 48 g a.s./ha after bee flight group and in the 24 g a.s./ha during bee flight group. In the 48 g a.s./ha after bee flight group and 24 g a.s./ha during bee flight group, the negative effects on mortality were observed also on the following day (day 1 a.a.). In these two test groups, significant effects on foraging activity were noticed on day 0 after application, observed also on days 1 and 2 a.a. in the 48 g a.s./ha after bee flight group and on day 1 a.a. in the 24 g a.s./ha during bee flight group.</p> <p>No effects on colony development, colony strength or bee brood were observed after exposure of the bees to pre-flower treatment with 48 g sulfoxaflor/ha, to dried residues applied at 48 g sulfoxaflor/ha after bee flight and to direct exposure to 24 g sulfoxaflor/ha. Following the application of 24 g sulfoxaflor/ha after the bee flight, brood termination rate of the bee colonies was higher compared to the control. Since this was not obvious in the higher rate with 48 g sulfoxaflor/ha and after direct application to the bees to 24 g sulfoxaflor/ha, this must be seen as not a test item related effect.</p> <p>No significant negative effects on pupae mortality, colony condition, colony strength and brood compensation index were noticed in any test item group compared to control.</p> <p>Clear adverse effects were observed in the reference item treated colonies (Insegar (300 g fenoxycarb/ha).</p> <p>No adverse effect on the overall survival of the colonies could be observed after application of GF-2626 at all rates and treatment scenarios.</p>
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Report:	IIIA 10.4.7/03, Schmitzer, S (2011c)
Title:	Toxicity Testing of GF-2626 on Honey Bees (<i>Apis mellifera</i> L.) under Semi-Field Conditions - Tunnel Test.
Document No:	Dow Study ID: 101602
Guidelines:	OEPP/EPPO guideline No. 170 (3) (OEPP/EPPO, 2001)
GLP	Yes

Study Comments: IIIA 10.4.7./03	Already reviewed in the EU DAR for Sulfoxaflor (2013).
Agreed Endpoints: IIIA 10.4. 7./03	The development of the colony strength among the colonies in all treatment groups followed more or less the same pattern. Following the start of the study the colony strength was decreasing in all treatment groups. Given the time of the season it is clear that there is no large growth in bee brood. Since these patterns are very similar it can be

	<p>concluded that there was no test item related influence on the overall strength of the colonies. Strongest decrease was seen in both reference item treated groups.</p> <p>For honey bees and colonies exposed to GF-2626 applied at 4, 8 and 24 g sulfoxaflor/ha during bee flight no effects on mortality, flight intensity, behaviour or brood and overall colony condition were observed.</p>
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Following reports has been provided by the Notifier during the assessment by the Czech Republic of the Central Zone registration:

Report:	IIIA 10.4.7/04, Liepold K. (2011)
Title:	A Semi-field Study to Investigate Residues in Honeybee Products (<i>Apis mellifera carnica</i> L.; (Hymenoptera, Apidae) in <i>Phacelia tanacetifolia</i> in Germany in 2010.
Document No:	Study Code S10-01824. Dow AgroSciences unpublished report no. 2009317. DAS Study ID: 110414.
Guidelines:	IVA (BEUTEL et al., 1992), EU (1997)
GLP	Yes

Test material

Test item:	GF-2626
Purity:	128 g/L XDE-208 (analysed)
Description:	Off-white to tan liquid
Lot No./Batch No. :	E-3144-36

Test system

Organism (Species):	Honey bee, <i>Apis mellifera carnica</i> L. (Hymenoptera, Apidae)
Study Type:	Semi-field study
GLP Status:	GLP
Guidelines followed:	IVA (BEUTEL et al., 1992), EU (1997)
Guideline deviations reported by Study Director:	None.
Study design:	<p>Application before flowering in treatment groups T1 and T2 and application during flowering and during daily bee-flight in treatment groups T3 and T4. Nectar stomachs from forager bees, pollen samples from pollen traps and plants of <i>Phacelia tanacetifolia</i> were taken for analysis on day of application during bee flight, 5 and 6 days after application during bee flight. The condition of the colonies and bee brood was assessed once before set-up of the colonies in the tunnels.</p> <p>1 replicate (tunnel) per treatment group, each consisting of 1 honey bee colony.</p>
Test concentrations:	24 g a.i./ha (T1 and T3), 48 g a.i./ha (T2 and T4)

Methodology

This study included five treatment groups. The test item GF-2626 (active substance: XDE-208) was applied at rates of 24 g a.i./ha (treatment groups T1 and T3) and 48 g a.i./ha (treatment groups T2 and T4) in separated tunnels. A fifth group (tunnel) left untreated served as control. Applications in treatment group T1 and T2 were conducted before flowering; applications in treatment group T3 and T4 were made during flowering and during daily bee-flight. All applications were made with a rate of 400 L water/ha. The effect of the test item was examined on commercial bee colonies in tunnels (approx. 200 m²) placed on plots with *Phacelia tanacetifolia*. Condition of the colonies and the development of the bee brood were assessed once before the start of exposure of the honeybees in the tunnels. In order to evaluate the magnitude of residues of the test item GF-2626 nectar stomachs from forager bees, pollen samples from pollen traps and plants of *Phacelia tanacetifolia* were taken for analysis.

Results

The colony strength before set-up in the tunnels ranged from 17511 to 23888 honeybees in the different treatment groups and the control. Regarding the brood development, it can be stated that all colonies of all treatment groups (T1, T2, T3, T4 and control) had brood of all stages (eggs, larvae, sealed brood). Food (nectar and pollen) was also present in all colonies with a higher percentage of nectar (13.28 % to 37.50%) compared to pollen (7.34 % to 13.28 %).

No residues of XDE-208 and its metabolite X11719474 at or above the respective limit of detection (LOD) levels (0.003 mg/kg for plants, nectar and pollen) were found in any of the untreated control samples. In nectar samples from forager bees no residues of X11719474 were detected in all treatment groups for sampling 1 and 2. In sampling 3 (DAA6) residues were found in treatment group T2 and T4. However these residues were below the limit of quantification (LOQ 0.01 mg/kg). For treatment groups T1 and T2 no residues of XDE-208 were detected for all sampling dates. In treatment group T3 a mean (of 3 samples) of 0.0441 mg/kg was determined in sampling 1 (DAA0). In sampling 2 and 3 residues were below LOQ (0.01 mg/kg). Residues of XDE-208 in treatment group T4 were 0.0647 mg/kg (mean of 3 samples) in sampling 1 (DAA0), declined to 0.0109 in sampling 2 (DAA5) and were below LOQ for sampling 3 (DAA6).

In pollen samples from pollen traps no residues of XDE-208 and its metabolite X11719474 were determined in treatment group T1 for all samplings. In treatment group T2 residues of XDE-208 and X11719474 were below LOQ (0.01 mg/kg) or below LOD (0.003 mg/kg) for all sampling dates. No residues of the metabolite X11719474 were detected for all samplings in treatment group T3. The residues of XDE-208 in pollen in treatment group T3 ranged from 0.290 mg/kg to 0.0160 mg/kg. In treatment group T4 residues of XDE-208 declined from 0.809 mg/kg in sampling 1 (DAA0) to 0.0325 mg/kg in sampling 3 (DAA6) and residues of the metabolite X11719474 were below LOQ (0.01 mg/kg) or LOD (0.003 mg/kg).

In whole *Phacelia tanacetifolia* plants residues of XDE-208 and X11719474 in treatment group T1 were below LOQ (0.01 mg/kg) or LOD (0.003 mg/kg). In treatment group T2 residues of XDE-208 found in sampling 1 (DAA0) were 0.0342 mg/kg, whereas no residues were detected in the following samplings (DAA5 and DAA6). Residues of the metabolite X11719474 were below LOQ (0.01 mg/kg) for sampling 1 and 2; 0.0113 mg/kg were found in sampling 3 (DAA6). In treatment group T3 the residues of XDE-208 ranged from 0.516 to 0.0480 mg/kg. The metabolite X11719474 was not detectable in treatment group T3 for sampling 1 (DAA0) and was below the LOQ (0.01 mg/kg) for the subsequent samplings. In treatment group T4 residues of XDE-208 in plants were determined between 1.48 and 0.0507 mg/kg. The metabolite X11719474 was below LOQ (0.01 mg/kg) for sampling 1 (DAA0) and 2 (DAA5) and 0.0147 mg/kg for sampling 3 (DAA6).

A summary of the sulfoxaflor and X11719474 residues found in nectar, pollen and plants is presented in Tables 3, 4 and 5 below.

Table 3: Results of nectar analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	nd	nd
			nd	nd
			nd	nd
	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	nd
			nd	nd
			nd	nd
	T3	24	0.0438	nd
			0.0462	nd
			0.0424	nd
	T4	48	0.0889	nd
			0.0548	nd
			0.0503	nd
5 DAA	C	-	nd	nd
			nd	nd
			nd	nd
	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	nd
			nd	nd
			nd	nd
	T3	24	<LOQ (0.005)	nd
			<LOQ (0.005)	nd
			<LOQ (0.004)	nd
	T4	48	0.0106	nd
			0.0110	nd
			0.0111	nd
6 DAA	C	-	nd	nd
			nd	nd
			nd	nd
	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	<LOQ (0.004)
			nd	<LOQ (0.004)
			nd	<LOQ (0.004)
	T3	24	<LOQ (0.004)	nd
			<LOQ (0.004)	nd
			<LOQ (0.005)	nd
	T4	48	<LOQ (0.0097)	<LOQ (0.003)

			<LOQ (0.006)	<LOQ (0.004)
			<LOQ (0.008)	<LOQ (0.004)

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

Table 4: Results of pollen analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	<LOQ (0.005)	nd
	T3	24	0.290	nd
	T4	48	0.809	<LOQ (0.004)
5 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	nd	nd
	T3	24	<LOQ (0.003)	nd
	T4	48	0.0191	nd
6 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	nd	<LOQ (0.004)
	T3	24	0.0160	nd
	T4	48	0.0325	nd

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

Table 5: Results of whole plant analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	Nd	nd
	T1	24	<LOQ (0.009/0.009)	<LOQ (0.004/0.003)
	T2	48	0.0342	<LOQ (0.006)
	T3	24	0.516	nd
	T4	48	1.48	<LOQ (0.009)
5 DAA	C	-	nd/nd	nd/nd
	T1	24	<LOQ (0.004/0.004)	<LOQ (0.005/0.005)
	T2	48	nd/nd	<LOQ (0.0099/0.00999)
	T3	24	0.0274	<LOQ (0.004)
	T4	48	0.0520	<LOQ (0.009)
6 DAA	C	-	Nd	nd
	T1	24	Nd	<LOQ (0.009)

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
	T2	48	Nd	0.0113
	T3	24	0.0480	<LOQ (0.007)
	T4	48	0.0507	nd

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

Conclusions

Residues of XDE-208 and its metabolite X11719474 were determined in plant tissue after an application before and during flowering. In pollen samples quantifiable residues of XDE-208 were determined in treatment groups T3 and T4 with an application during flowering and daily bee-flight. Quantifiable residues of XDE-208 were determined in nectar samples at DAA0 in treatment group T3 (24 g a.i./ha) and at DAA0 and DAA5 in treatment group T4 (48 g a.i./ha). Residues of the parent are at the highest level in samples after application and decline in later samplings. Residues of the metabolite were measured at day 6 above LOQ.

Study Comments: IIIA 10.4.7/04	-
Agreed Endpoints: IIIA 10.4.7/04	The results show that, when applications of GF-2626 at 24 and 48 g a.s./ha were made 5 days before flowering, residues of sulfoxaflor and X11719474 were not detectable or were below the LOQ in pollen and nectar samples taken during full flowering. Additionally, following applications of GF-2626 during flowering, low levels of sulfoxaflor and X11719474 were present in nectar (maximum of 0.0889 mg/kg of sulfoxaflor), and these levels rapidly declined to be below the level of quantification in nectar at 6 days after application. In pollen, levels were slightly higher (maximum of 0.809 mg/kg) but also declined rapidly to 0.0325 mg/kg, when applied at 48 g a.s./ha.

Report:	IIIA 10.4.7/05, anonymous (2016)
Title:	Pre-Flowering Applications of Sulfoxaflor: Exposure and Effects on Honey bees
Document No:	-
Guidelines:	n.a.
GLP	n.a.

Summary

To investigate the risk of pre-flowering applications of sulfoxaflor to foraging honey bees, field trials were conducted to determine exposure in pollen and nectar, and to evaluate effects on mortality, foraging activity and brood development of bees. Residues were not detected (or were below the limit of quantification) in the pollen and nectar of flowering crops following an application of sulfoxaflor made 4 days before the onset of flowering. Based on the negligible exposure, the corresponding risk is also expected to be low.

This assumption of low risk has been confirmed in tunnel trials conducted in *Phacelia* that show pre-flowering applications of sulfoxaflor at 48 g a.s./ha had no effect on honey bee mortality, foraging activity and development of brood. The low risk to bees from pre-flowering applications can be explained by the short persistence of sulfoxaflor in plant material and soil combined with the low toxicity of metabolites formed.

1. Introduction

Sulfoxaflor has a short persistence in crop plants, having an average DT₅₀ of 7.5 days and a median DT₅₀ of 5.5 days based on an extensive data base that includes 29 different crops and 316 decline events on fruits, vegetables, leaves, forage, seeds, grain and root/tuber commodities. Persistence of sulfoxaflor in soil is also short with a maximum soil field DT₅₀ of 7.4 days.

Additionally, the metabolites of sulfoxaflor are known to have low toxicity to honey bees, as shown in the table below.

Table 1: Toxicity of sulfoxaflor and metabolites to honey bees (OECD 213 guideline studies conducted to GLP)

Test substance	Acute oral toxicity (LD ₅₀ µg a.s./bee)
Sulfoxaflor	0.146 (48h)
X11719474 (plant and major soil metabolite)	>100 (96h)
X11519540 (minor soil metabolite)	>91.2 (48h)
X11579457 (minor soil metabolite)	45.7 (48h)
X11721061 (plant metabolite)	>103.5 (48h)

It therefore follows that pre-flowering applications of sulfoxaflor are likely to show low risk to foraging honey bees. To investigate this assumption, pre-flowering applications of sulfoxaflor have been made to *Phacelia*; pollen and nectar have subsequently been collected from the crop when in flower and analysis of residues conducted. The effects of pre-flowering sulfoxaflor applications on the mortality and foraging activity of honey bees have also been investigated. This paper summarises the studies and provides a position on the acceptable risk to honey bees of pre-flowering sulfoxaflor applications.

2. Exposure of sulfoxaflor to bees in pollen and nectar following pre-flowering applications

A semi-field study has been conducted to investigate the residues of sulfoxaflor, and the main plant metabolite X11719474, in pollen, nectar and plants following application to *Phacelia* (Liepold, 2011¹⁵). A 120 g/L SC sulfoxaflor formulation (GF-2626) was applied at 24 and 48 g a.s./ha (T1 and T2) before the onset of flowering (BBCH 58) in three replicate tunnels. In separate tunnels GF-2626 was applied at

¹⁵ Liepold, K. (2011). GF-2626: A semi-field study to investigate residues in honeybee products (*Apis mellifera carnica* L.; Hymenoptera, Apidae) in *Phacelia tanacetifolia* in Germany in 2010. Dow AgroSciences internal report no. 2009317.

24 and 48 g a.s./ha (T3 and T4) during flowering (BBCH 64) and honey bee foraging. In order to evaluate the magnitude of residues of the test item GF-2626 and metabolite X11719474, nectar stomachs from forager bees, pollen samples from pollen traps and plants of *Phacelia* were taken for analysis. Samples were taken on day 0 after the application and on days +5 and +6. A summary of the application and sampling regime is presented in the table below and a full study summary is provided in the Appendix.

Table 2: Timing of GF-2626 application and sampling for residue analysis

Activity	DAA*	Date
Application before flowering (T1 and T2) BBCH 58	-10	15 Jul 2010
Brood assessment	-7	18 Jul 2010
Set up of the colonies in the tunnels	-6	19 Jul 2010
Application during flowering and bee-flight (T3 and T4) BBCH 64	0	25 Jul 2010
1st sampling of forager bees, pollen from pollen traps and whole plants	0	25 Jul 2010
2nd sampling of forager bees, pollen from pollen traps and whole plants	+5	30 Jul 2010
3rd sampling of forager bees, pollen from pollen traps and whole plants	+6	31 Jul 2010

*DAA: Days after application during bee flight

Colonies are generally moved into the tunnel when the crop has started to flower, it can therefore be assumed that, in this particular study, the pre-flowering application was made 4 days before the start of flowering. Additionally, the 1st sampling of pollen and nectar for residue analysis was made 10 days after the pre-flowering application.

A summary of the sulfoxaflor and X11719474 residues found in nectar, pollen and plants is presented in Tables 3, 4 and 5 below.

Table 3: Results of nectar analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	nd	nd
			nd	nd
			nd	nd
	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	nd
			nd	nd
			nd	nd
	T3	24	0.0438	nd
			0.0462	nd
			0.0424	nd
	T4	48	0.0889	nd
			0.0548	nd
			0.0503	nd
5 DAA	C	-	nd	nd
			nd	nd
			nd	nd

	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	nd
			nd	nd
			nd	nd
	T3	24	<LOQ (0.005)	nd
			<LOQ (0.005)	nd
			<LOQ (0.004)	nd
	T4	48	0.0106	nd
			0.0110	nd
			0.0111	nd
6 DAA	C	-	nd	nd
			nd	nd
			nd	nd
	T1	24	nd	nd
			nd	nd
			nd	nd
	T2	48	nd	<LOQ (0.004)
			nd	<LOQ (0.004)
			nd	<LOQ (0.004)
	T3	24	<LOQ (0.004)	nd
			<LOQ (0.004)	nd
			<LOQ (0.005)	nd
	T4	48	<LOQ (0.0097)	<LOQ (0.003)
			<LOQ (0.006)	<LOQ (0.004)
			<LOQ (0.008)	<LOQ (0.004)

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

Table 4: Results of pollen analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	<LOQ (0.005)	nd
	T3	24	0.290	nd
	T4	48	0.809	<LOQ (0.004)
5 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	nd	nd
	T3	24	<LOQ (0.003)	nd
	T4	48	0.0191	nd
6 DAA	C	-	nd	nd
	T1	24	nd	nd
	T2	48	nd	<LOQ (0.004)
	T3	24	0.0160	nd
	T4	48	0.0325	nd

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

Table 5: Results of whole plant analysis

Timing	Treatment	Application rate (g a.s./ha)	Sulfoxaflor residues (mg/kg)	X11719474 residues (mg/kg)
0 DAA	C	-	Nd	nd
	T1	24	<LOQ (0.009/0.009)	<LOQ (0.004/0.003)
	T2	48	0.0342	<LOQ (0.006)
	T3	24	0.516	nd
	T4	48	1.48	<LOQ (0.009)
5 DAA	C	-	nd/nd	nd/nd
	T1	24	<LOQ (0.004/0.004)	<LOQ (0.005/0.005)
	T2	48	nd/nd	<LOQ (0.0099/0.00999)
	T3	24	0.0274	<LOQ (0.004)
	T4	48	0.0520	<LOQ (0.009)
6 DAA	C	-	Nd	nd
	T1	24	Nd	<LOQ (0.009)
	T2	48	Nd	0.0113
	T3	24	0.0480	<LOQ (0.007)
	T4	48	0.0507	nd

DAA: days after application during bee flight

C: untreated; T1/T2/T3/T4: test item group 1/2/3/4

n.d.: not detected (residue value was less than 30% of the LOQ, 0.003 mg/kg)

Values between 0.003 mg/kg (30% of the LOQ) and 0.01 mg/kg (LOQ) are reported as < LOQ

The results show that, when applications of GF-2626 at 24 and 48 g a.s./ha were made 4 days before flowering, residues of sulfoxaflor and X11719474 were not detectable or were below the LOQ in pollen and nectar samples taken during full flowering. Additionally, following applications of GF-2626 during flowering, low levels of sulfoxaflor and X11719474 were present in nectar (maximum of 0.0889 mg/kg of sulfoxaflor), and these levels rapidly declined to be below the level of quantification in nectar at 6 days after application. In pollen, levels were slightly higher (maximum of 0.809 mg/kg) but also declined rapidly to 0.0325 mg/kg, when applied at 48 g a.s./ha. From this study it can be concluded that residues of sulfoxaflor are not persistent in plant material, and that honey bees will not be exposed to residues of sulfoxaflor in pollen and nectar following pre-flowering applications.

3. Effects of pre-flowering applications on bees

Two semi-field tunnel trials have been conducted to investigate the effects of applying sulfoxaflor before flowering on honey bees foraging on *Phacelia* in tunnels (Schmitzer, 2011a¹⁶ and 2011b¹⁷). In both studies, a 120 g/L SC sulfoxaflor formulation (GF-2626) was applied to the crop before flowering at 48 g

¹⁶ Schmitzer, S. (2011a). Study on the Effect of GF-2626 on Honey Bees and their Brood (*Apis mellifera* L.) under Semi-Field Conditions - Tunnel Test. Dow AgroSciences internal report no. 2009052.

¹⁷ Schmitzer, S. (2011b). Study on the Effect of GF-2626 on Honey Bee Brood (*Apis mellifera* L.) under Semi-Field Conditions - Tunnel Test. Dow AgroSciences internal report no. 2008981.

a.s./ha in three replicate tunnels. Five days after the application, bees were introduced to the tunnels as the crop started flowering and the exposure period lasted 10 days. Mortality, foraging activity, condition of the colonies and development of the brood was assessed until the end of the trial. In one trial 2 reference tunnels were used with fenoxycarb applied at 300 g a.s./ha and dimethoate applied at 600 g a.s./ha in separate tunnels, and in the second trial fenoxycarb was applied at 300 g a.s./ha. The results from both trials are summarised in Table 5 and 6 below.

Table 5: Effects of sulfoxaflor on honey bees and their brood under semi-field conditions (trial 1)

Parameter	Treatment ¹⁾			
	Control	Pre-flowering GF-2626 (48 g a.s./ha)	Reference Item Insegar (0.3 kg a.s./ha)	Reference Item Perfekthion (0.6 kg a.s./ha)
Mean mortality of worker bees / colony / day [%] during				
pre-application phase ²⁾	10.6	18.6 (n.s.)	12.8 (n.s.)	12.8 (n.s.)
exposure phase in the tunnels ²⁾	20.4	29.2 (n.s.)	22.5 (n.s.)	164.1 (*)
phase outside the tunnels ³⁾	2.5	2.6 (n.s.)	3.0 (n.s.)	5.9 (*)
overall after application	7.6	10.2 (n.s.)	8.5 (n.s.)	51.1 (*)
Total mortality of larvae and pupae [n] during				
pre-application phase ²⁾	4	0 (n.s.)	5 (n.s.)	1 (n.s.)
exposure phase in the tunnels ²⁾	7	5 (n.s.)	20 (n.s.)	1 (n.s.)
phase outside the tunnels ³⁾	0	1 (n.s.)	97 (*)	0 (n.s.)
overall after application	7	6 (n.s.)	117 (*)	1 (n.s.)
Mean foraging activity / m ² / colony / day [n] during				
pre-application phase	10.7	10.0 (n.s.)	7.3 (n.s.)	10.0 (n.s.)
exposure phase in the tunnels	14.3	12.9 (n.s.)	12.4 (n.s.)	0.5 (*)
Mean brood termination rate [%]	65.3	65.6 (n.s.)	98.6 (n.s.)	100.0 (n.s.)

1) Each with three tunnels (replicate)

2) mean number of dead honeybees per day and colony found in dead bee traps and on gauze strips in the tunnels

3) mean number of dead honeybees per day and colony found in dead bee traps, only

Statistic: Dunnett's t-test (mortality, foraging activity, termination rate), $\alpha=0.05$, one-sided greater or one-sided smaller (foraging activity, brood indices)

n.s. = not statistically significant compared to the control; * = statistically significant compared to the control

Table 6: Effects of sulfoxaflor on honey bees and their brood under semi-field conditions (trial 2)

Parameter	Treatment ¹⁾		
	Control	Pre-flowering GF-2626 (48 g a.s./ha)	Reference Item Insegar (0.3 kg a.s./ha)
Mean mortality of worker bees / colony / day [%] during			
pre-application phase ²⁾	15.2	16.7 (n.s.)	15.4 (n.s.)
exposure phase in the tunnels ²⁾	19.3	29.5 (n.s.)	19.3 (n.s.)
phase outside the tunnels ³⁾	2.2	3.5 (n.s.)	2.7 (n.s.)
overall after application	7.1	11.0 (n.s.)	7.4 (n.s.)
Total mortality of larvae and pupae [n] during			
pre-application phase ²⁾	0	0 (n.d.)	0 (n.d.)
exposure phase in the tunnels ²⁾	2	0 (n.s.)	2 (n.s.)
phase outside the tunnels ³⁾	0	5 (n.s.)	529 (*)
overall after application	2	5 (n.s.)	531 (*)
Mean foraging activity / m ² / colony / day [n] during			
pre-application phase	13.0	12.9 (n.s.)	12.7 (n.s.)
exposure phase in the tunnels	25.0	22.1 (n.s.)	24.6 (n.s.)
Mean brood termination rate [%]	56.4	58.1 (n.s.)	98.1 (*)

1) each with three tunnels (replicate)

2) mean number of dead honeybees per day and colony found in dead bee traps and on gauze strips in the tunnels

3) mean number of dead honeybees per day and colony found in dead bee traps, only

Statistic: Dunnett's t-test (mortality, foraging activity) or Student t-test (termination rate), $\alpha=0.05$, one-sided greater (mortality and termination rate) or one-sided smaller (foraging activity, brood indices)

n.s. = not statistically significant compared to the control; * = statistically significant compared to the control;

n.d. = not determined

The results from both semi-field tunnel trials show there were no effects on mortality of worker bees, larvae and pupae from pre-flowering applications of sulfoxaflor at 48 g a.s./ha. The control mean brood termination rate in both trials was high making a conclusion on brood development difficult, but the toxic standards clearly had a significant effect and sulfoxaflor was similar to the control, thus implying that if sulfoxaflor affected the brood it would have been identified in the study.

4. Conclusions

Sulfoxaflor is not persistent in plant material or soil, having a mean DT₅₀ in plants of 7.5 days and a maximum field DT₅₀ in soil of 7.4 days. The short persistence of sulfoxaflor is evident in the field work conducted to investigate the risk of pre-flowering applications to honey bees. Residues were not detected (or were below the limit of quantification) in the pollen and nectar of flowering crops following an application of sulfoxaflor made 4 days before the onset of flowering. The negligible exposure therefore means that subsequent risk to foraging bees will also be low. This has been confirmed in tunnel trials conducted in *Phacelia* that showed pre-flowering applications of sulfoxaflor at 48 g a.s./ha had no effect on honey bee mortality, foraging activity and development of brood.

Study Comments: IIIA 10.4.7/05	-
Agreed Endpoints: IIIA 10.4.7/05	It is concluded that the risk to honeybees is acceptable when the product is applied before flowering. Pre-flowering application made 5 days before flowering is considered sufficiently protective by ZcoRMS.

IIIA 10.5 Effects on Arthropods Other Than Bees

GF-2626 was one of the representative formulations in the EU review of sulfoxaflor. However new risk assessment parameters are now considered in the assessment of risk to non-target arthropods and hence an appropriate risk assessment with the proposed use pattern is provided and is considered adequate.

The critical endpoints employed in the risk assessment for non-target arthropods are indicated in the table below.

Table 10.5-1: EU Endpoints - Toxicity of GF-2626 to arthropods other than bees

Compound	Test species	Test substrate	EU agreed endpoints*	
Laboratory study				
GF-2626	<i>Aphidius rhopalosiphi</i>	Glass plate	Mortality: LR ₅₀ = 0.0209 g a.s./ha	
GF-2626	<i>Typhlodromus pyri</i>	Glass plate	Mortality: LR ₅₀ = 384 g a.s./ha	
Extended laboratory study				
GF-2626	<i>Aphidius rhopalosiphi</i>	Barley seedlings	Mortality: LR ₅₀ = 0.945 g a.s./ha Reproduction: ER ₅₀ > 1.02 g a.s./ha	
GF-2032	<i>Aleochara bilineata</i>	Sandy soil	Mortality: LR ₅₀ > 24 g a.s./ha Reproduction: ER ₅₀ > 24 g a.s./ha	
GF-2626	<i>Chrysoperla carnea</i>	<i>Phaseolus vulgaris</i> leaf discs	Mortality: LR ₅₀ > 48 g a.s./ha Reproduction: ER ₅₀ > 48 g a.s./ha	
Aged residue study				
GF-2626	<i>Aphidius rhopalosiphi</i>	Barley seedlings	<u>0 DAT</u>	<u>Corrected mortality:</u>
			400	100
			200	100
			58.33	100
			<u>7 DAT</u>	
			400	100
			200	83
			58.33	73
			<u>14 DAT</u>	
			400	53
			200	50
			58.33	23
			<u>21 DAT</u>	
			400	17
			200	4
			58.33	4
			<u>28 DAT</u>	10
			400	7
			200	
			<u>14 DAT</u>	<u>Corrected reproduction:</u>
			400	-
			200	3.6
			58.33	
			<u>21 DAT</u>	18.5
400	-13.6			
200	17.0			
58.33				
<u>28 DAT</u>	-5.4			
400	8.5			
200				
mL GF-				

			2626/ha	
Field or semi-field tests				
GF-2372	<p>Cereal field test - S.W. France</p> <p>GF-2372 applied once at a rate of 24 or 48 g Sulfoxaflor/ha, or twice at 24 g Sulfoxaflor/ha with a spray interval of 21 days, induced moderate and transient but statistically significant adverse effects on populations of certain orders (mainly Homoptera, Hymenoptera and few Diptera and Collembola). Recovery was seen for all these taxa within one or two months after the first application. There was no clear differentiation in effects related to test rate or application frequency. For few hymenopteran taxa the recovery period was slightly longer in the 2 x 24 g Sulfoxaflor/ha rate. One mite taxon (Stigmaeidae) showed a delayed but persistent adverse effect in the 2 x 24 g Sulfoxaflor/ha treatment, but differences compared to the control were statistically significant only on one sampling moment (<i>ca.</i> 3 months after the second application). These findings were confirmed by community analyses, although the observed responses of the arthropod communities were not statistically significant for any of the GF-2372 treatments tested.</p> <p>Based on De Jong <i>et al.</i> (2010), the effect of one application of GF-2372 at 24 or 48 g Sulfoxaflor/ha, or two applications at 24 g Sulfoxaflor/ha in a commercial cereal field in Southern Europe (France), would be classified as 3 (clear response of taxa, but full recovery within two months after the first application for all but one taxon, full recovery of the community within two months after the first application).</p> <p>Hence, no sustained adverse effects on arthropod communities prevailing in a commercial cereal field in Southern Europe (France) are likely to occur, when GF-2372 (active ingredient Sulfoxaflor) is applied at rates of up to 48 g Sulfoxaflor/ha.</p>			
GF-2372	<p>Cereal field test - the Netherlands</p> <p>GF-2372 applied once at a rate of 24 or 48 g Sulfoxaflor/ha, or twice at 24 g Sulfoxaflor/ha with a spray interval of 22 days, induced moderate but statistically significant adverse effects on populations of certain orders (mainly Homoptera, Diptera, Hymenoptera and Collembola), but recovery was seen for almost all these taxa within one or two months after the first application. There was usually no clear differentiation in effects related to test rate or application frequency. For few hymenopteran taxa the recovery period was slightly longer in the 2 x 24 g Sulfoxaflor/ha rate.</p> <p>Stronger effects were observed on aphids and a few associated specialist predators (Coccinellidae) and parasitoids (e.g. Aphelinidae). Aphid populations recovered within one month after application, before natural decline (migration). Related predators and parasitoids also disappeared from the field. It is expected that adverse effects observed for the specialist predators and parasitoids were at least partly due to indirect effects of reduced host availability.</p> <p>Multivariate analyses confirmed that recovery of the entire community occurred within approximately two months after the first application in all three GF-2372 treatments. Based on De Jong <i>et al.</i> (2010), the effect of one application of GF-2372 at 24 or 48 g Sulfoxaflor/ha, or two applications at 24 g Sulfoxaflor/ha in a commercial cereal field in Northern Europe (The Netherlands), would be classified as 3 (clear response of taxa, but full recovery within two months after the first application).</p> <p>Hence, no sustained adverse effects on arthropod communities prevailing in a commercial cereal field in Northern Europe (The Netherlands) are likely to occur, when GF-2372 (active ingredient Sulfoxaflor) is applied at rates of up to 48 g Sulfoxaflor/ha.</p>			

GF-2626	<p>NTA off-field test - S.W, France</p> <p>The impact of simulated drift events on arthropod populations and communities typical of grassy field margins in Southern Europe was evaluated for GF-2626 at exposures equivalent to 0.3, 0.6, 1.2, 2.4, 4.8 and 9.6 g Sulfoxaflor/ha.</p> <p>At the community level no consistent rate related response was noted. For some test item rates faint and transient responses could be observed, but the magnitude was not related to the dose rate. At the population level no consistent dose related adverse effects from GF-2626 treatments were found, except for the collembolan taxon Bourletiellidae and for aphids. In all rates populations of the family Bourletiellidae were recovered within one or two months after application. Hence, no sustained adverse effects on arthropod communities prevailing in grasslands in South-West France are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) is applied at rates of up to 9.6 g Sulfoxaflor/ha.</p>
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* EFSA Journal 2014; 12(5):3692

The critical GAP is summarised in Table 10-2.

Risk Assessment for Arthropods other than Bees

The risk assessment for effects to non-target arthropods for GF-2626 is based on the rates of 2 x 24 g a.s./ha or 1 x 48 g a.s./ha for non-target arthropod populations present in the in-field area. Another area of risk is to non-target arthropod populations present in the off-field area where these species are exposed to spray drift at the time of application.

First tier risk assessment

A risk assessment for these scenarios has been conducted using the Hazard Quotient approach in ESCORT 2 (Guidance Document on Terrestrial Ecotoxicology: SANCO/10329/2002).

From the results in Table 10.5-1, the LR₅₀ values for GF-2626 to the indicator species *T. pyri* and *A. rhopalosiph*, under laboratory conditions, were estimated to be 384 and 0.0209 g a.s./ha, respectively. These values will be taken to represent the realistic worst case end point for non-target arthropods exposed to GF-2626. The risk assessment is presented in the table below.

Table 10.5-3: Risk to non-target arthropods from applications of GF-2626 – laboratory data

Scenario	Species	Exposure (g a.s./ha)	Correction factor	VDF	LR ₅₀ (g a.s./ha)	HQ
Fruiting vegetables: 1 x 48 g a.s./ha (Field crops)						
In-field	<i>T. pyri</i>	48	N/A	N/A	384	0.125
	<i>A. rhopalosiphi</i>	48	N/A	N/A	0.0209	2297
Off-field, spray drift at 1 m (2.77%)	<i>T. pyri</i>	1.33	10	10	384	0.003
	<i>A. rhopalosiphi</i>	1.33	10	10	0.0209	63.6
Pome/stone fruits, citrus: 1 x 48 g a.s./ha (Fruit crops, early)						
In-field	<i>T. pyri</i>	48	N/A	N/A	384	0.125
	<i>A. rhopalosiphi</i>	48	N/A	N/A	0.0209	2297
Off-field, spray drift at 3 m (29.2%)	<i>T. pyri</i>	14.02	10	10	384	0.037
	<i>A. rhopalosiphi</i>	14.02	10	10	0.0209	670.6
Brassicas: 1 x 24 g a.s./ha (Field crops)						
In-field	<i>T. pyri</i>	24	N/A	N/A	384	0.063
	<i>A. rhopalosiphi</i>	24	N/A	N/A	0.0209	1148
Off-field, spray drift at 1 m (2.77%)	<i>T. pyri</i>	0.665	10	10	384	0.002
	<i>A. rhopalosiphi</i>	0.665	10	10	0.0209	31.8
Potatoes: 2 x 24 g a.s./ha (Field crops)						
In-field	<i>T. pyri</i>	40.8*	N/A	N/A	384	0.106
	<i>A. rhopalosiphi</i>	40.8*	N/A	N/A	0.0209	1952
Off-field, spray drift at 1 m (2.38%)	<i>T. pyri</i>	0.971	10	10	384	0.003
	<i>A. rhopalosiphi</i>	0.971	10	10	0.0209	46.5
Beans/peas: 2 x 24 g a.s./ha (Vegetables, height > 50 cm)						
In-field	<i>T. pyri</i>	40.8*	N/A	N/A	384	0.106
	<i>A. rhopalosiphi</i>	40.8*	N/A	N/A	0.0209	1952
Off-field, spray drift at 3 m (7.23%)	<i>T. pyri</i>	2.95	10	10	384	0.008
	<i>A. rhopalosiphi</i>	2.95	10	10	0.0209	141.1
Ornamentals: 1 x 48 g a.s./ha (Ornamentals, height > 50 cm)						
In-field	<i>T. pyri</i>	48	N/A	N/A	384	0.125
	<i>A. rhopalosiphi</i>	48	N/A	N/A	0.0209	2297
Off-field, spray drift at 3 m (8.02%)	<i>T. pyri</i>	3.85	10	10	384	0.010
	<i>A. rhopalosiphi</i>	3.85	10	10	0.0209	184.2

N/A: not applicable.

VDF: Vegetation distribution factor

* Application rate = 2 x 24 g a.s./ha; MAF = 1.7

Note: Correction factor of 10 is applied to off-field exposure in HQ calculation to account for unknown species of greater sensitivity (ESCORT 2).

HQs shown in **bold** are greater than the trigger value of 2

The in-field and off-field HQs for *T. pyri* are below the trigger value of 2, indicating an acceptable risk, and no further testing is required on this species. The in-field and off-field HQs for *A. rhopalosiphi* are greater than the trigger value of 2, indicating the need for a higher tier risk assessment.

Higher tier risk assessment

Under ESCORT 2, given that for one indicator species the in-field and off-field first tier HQ of 2 has been breached, in addition to further higher tier testing with the standard first tier indicator species, two additional crop relevant species are required to be tested. This requirement has been addressed by providing details of extended laboratory studies with the standard indicator species, plus the foliar dwelling predator *Chrysoperla carnea* and the ground dwelling parasitoid *Aleochara bilineata*. It is noted that, the study on *A. bilineata* was conducted with a different formulation (GF-2032, a SC formulation similar to GF-2626; containing 22% wt/wt Sulfoxaflor.). The results of the extended laboratory study with *A. bilineata* can be extrapolated to the formulation GF-2626.

In addition, details have been provided for laboratory ‘aged residue’ studies with *A. rhopalosiphi* and GF-2626, for two non-target arthropod field studies with GF-2372 conducted in cereals in south-west France and in Netherlands and a field study with GF-2626 simulating drift events on non-target arthropod communities of grassy field margins in south-west France.

Extended laboratory data

The extended laboratory data for *A. rhopalosiphi*, *A. bilineata* and *C. carnea* have been used in a higher tier risk assessment.

Under ESCORT 2, lethal and sublethal effects in extended laboratory of $\geq 50\%$ following exposure at predicted in-field and off-field exposure rates, indicate the need for a further assessment of the impact on non-target arthropod populations. The in-field and off-field predicted exposure rates (PER) and corresponding risk assessment are presented in the table below.

Table 10.5-4: Risk to non-target arthropods from applications of GF-2626 – Extended laboratory data – lethal and sublethal effects

Species	Endpoints (g a.s./ha)	In-field PER (g a.s./ha)	Risk acceptable Y/N	CF	VDF	Off-field drift rate	Off-field PER (g a.s./ha)	Risk acceptable Y/N
Fruiting vegetables: 1 x 48 g a.s./ha (Field crops)								
<i>A. rhopalosiph hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	48	N	5	1	2.77% (1 m)	6.65	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		0.66	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		0.66	Y
Pome/stone fruits, citrus: 1 x 48 g a.s./ha (Fruit crops, early)								
<i>A. rhopalosiph hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	48	N	5	1	29.2% (3 m)	70.1	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		7.01	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		7.01	Y
Brassicas: 1 x 24 g a.s./ha (Field crops)								
<i>A. rhopalosiph hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	40.8	N	5	1	2.77% (1 m)	3.32	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		0.33	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		0.33	Y
Potatoes: 2 x 24 g a.s./ha (Field crops)								
<i>A. rhopalosiph hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	40.8*	N	5	1	2.38% (1 m)	4.86	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		0.49	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		0.49	Y
Beans/peas: 2 x 24 g a.s./ha (Vegetables, height > 50 cm)								
<i>A. rhopalosiph hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	40.8*	N	5	1	7.23% (3 m)	14.8	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		1.47	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		1.47	Y

Ornamentals: 1 x 48 g a.s./ha (Ornamentals, height > 50 cm)								
<i>A. rhopalosiph</i> <i>hi</i>	LR ₅₀ = 0.945 ER ₅₀ > 1.02	48	N	5	1	8.02% (3 m)	19.3	N
<i>C. carnea</i>	LR ₅₀ > 48 ER ₅₀ > 48		Y		10		1.92	Y
<i>A. bilineata</i>	LR ₅₀ > 24 ER ₅₀ > 24		N		10		1.92	Y

* Application rate = 2 x 24 g a.s./ha; MAF = 1.7

VDF: Vegetation distribution factor. Only included for studies with a 2-D exposure system

CF: Correction factor

Note: Correction factor of 5 is applied to off-field exposure to account for interspecies variability

By comparison of the in-field and off-field exposure values (PER) to the extended laboratory endpoints an unacceptable in-field and off-field risk is indicated to *A. rhopalosiph* but an acceptable off-field risk was indicated to *A. bilineata*. An acceptable in-field risk was also indicated to *C. carnea*. However, an acceptable in-field risk could not be concluded for *A. bilineata* as the product GF-2032 was not tested at a high enough rate, i.e. 24 g a.s./ha. This indicates that an application of GF-2626 may be harmful to certain sensitive groups of non-target arthropod. Consequently further consideration is necessary for both in-field and off-field communities of non-target arthropods.

Aged residue studies and field tests

Laboratory and extended laboratory toxicity studies determined *A. rhopalosiph* to be the most sensitive (and the only adversely affected) tested species. These findings were confirmed by the results of the field studies.

Two field studies were conducted in cereals in south-west France and in Netherland using GF-2372, and another field study simulating drift events on non-target arthropod communities of grassy field margins was carried out in south-west France using GF-2626. Since similar levels of toxicity of GF-2626 and GF-2372 to NTA were proved in laboratory toxicity studies, an extrapolation of toxicity data may be made between the two formulations.

I) In-field risk assessment for NTA

Under ESCORT 2, lethal and sublethal effects in aged residue studies of ≤ 50% following exposure at predicted in-field and off-field exposure rates, indicate an acceptable risk. In an aged residue test on the most sensitive species, *A. rhopalosiph*, carried out with GF-2626 at test rates representative of in-field exposure (48 and 24 g a.s./ha), less than 50% effects were noted on mortality and parasitism when aged for 21 days. In comparison with 100% mortality when exposed to freshly treated foliage, a distinct decline in potential adverse effects with time after treatment is demonstrated. These findings are also supported by the results of the cereals field studies.

Two field tests were conducted to investigate in-field effect on non-target arthropods in commercial cereal field. One test was located in the Netherlands and the other in south-west

France. In both cases the test item was GF-2372 and was tested according to three different application scenarios. One treatment was applied twice with approximately a 3 week spray interval at a rate of 24 g a.s./ha. In addition two single application treatments were tested, at 24 g and at 48 g a.s./ha. The first applications for each test were performed in spring 2010 for all three treatment scenarios.

Effects were similar in both tests. GF-2372 applied once at a rate of 24 or 48 g a.s./ha, or twice at 24 g a.s./ha with a spray interval of 21 days, induced moderate and transient but statistically significant adverse effects on populations of certain orders (mainly Homoptera, Hymenoptera, Diptera and Collembola). Recovery was seen for all these taxa within one or two months after the first application. There was no clear differentiation in effects related to test rate or application frequency. For few hymenopteran taxa the recovery period was slightly longer in the 2 x 24 g a.s./ha rate. In the southern test one mite taxon (Stigmaeidae) showed a delayed but persistent adverse effect in the 2 x 24 g a.s./ha treatment, but differences compared to the control were statistically significant only on one sampling moment (*ca.* 3 months after the second application). This was not observed in the northern test. Stronger effects were observed on aphids and a few associated specialist predators (Coccinellidae) and parasitoids (e.g. Aphelinidae). Aphid populations recovered within one month after application, before natural decline (migration). Related predators and parasitoids also disappeared from the field. It is expected that adverse effects observed for the specialist predators and parasitoids were at least partly due to indirect effects of reduced host availability. Multivariate analyses confirmed that recovery of the entire community occurred within approximately two months after the first application in all three GF-2372 treatments for both tests.

Based on the results of two cereal field studies, and given the lack of persistence of effect from exposure to treated foliage (as demonstrated in the above mentioned aged residue studies with *Aphidius*), long-term adverse effects persisting to the following season are considered unlikely.

It is concluded that although the proposed use of sulfoxaflor may adversely affect some ‘in-field’ non-target arthropod populations, such effects are unlikely to be long-term, and the potential for re-colonisation and recovery within a year was demonstrated.

II) Off-field risk assessment for NTA

The impact of simulated drift events on arthropod populations and communities typical of grassy field margins in Southern Europe was carried out with GF-2626 at exposures equivalent to 0.3, 0.6, 1.2, 2.4, 4.8 and 9.6 g sulfoxaflor/ha. At the community level no consistent rate related response was noted. For some test item rates faint and transient responses could be observed, but the magnitude was not related to the dose rate. At the population level no consistent dose related adverse effects from GF-2626 treatments were found, except for the collembolan taxon Bourletiellidae and for aphids. The aphids are target pest organisms for using of GF-2626, therefore the adverse effects are expected. In all rates populations of the family Bourletiellidae were recovered within one or two months after application. Moreover, the effects of GF-2626 on Collembola are covered by the field study on micro-arthropods, as well (see IIIA 10.6.4), that concluded a lack of adverse effects on micro-arthropod field community, including Collembola, after proposed uses of formulated sulfoxaflor.

In an aged residue test on the most sensitive species, *A. rhopalosiphi*, carried out with GF-2626 at test rates representative of off-field exposure for use on pome/stone fruit and citrus at 48 g a.s./ha (7 g a.s./ha), less than 50% effects were noted on mortality and parasitism when aged for 14 days. In comparison with 100% mortality when exposed to freshly treated foliage, a distinct decline in potential adverse effects with time after treatment is demonstrated. These findings are in compliance with the results of the off-field study.

zRMS conclusions:

According to ESCORT 2 guidance, no effects on arthropods in off-field areas are tolerated. Then, the study of Bakker, F. 2011 show potential adverse effects on some arthropods populations at the lower tested rate (0.3 g Sulfoxaflor/ha) with a recovery of two months..As states in the EFSA Journal of Sulfoxaflor “No sustained adverse effects on familylevels of arthropod communities prevailing in grasslands in South-West France are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) is applied at rates of up to 9.6 g Sulfoxaflor/ha. Then, zRMS choose to use this endpoint as a NOAER = 9.6 g Sulfoxaflor/ha associated with an assesement factor.

An assesement factor of 3 is considered necessary to take into account :

- the toxicity of the preparation (HQ for *A. rhopalosiphi* = 2297),
- the fact that many arthropods populations observed in the study need a recovery period including Aphidiinae (effects not clearly dose related up to and including 2.4 g a.s./ha).

The off-field risk assesement for non-target arthropods, based on the endpoint NOAER = 9.6 g Sulfoxaflor/ha corrected with a factor 3 is presented in the following table:

Dose (g/ha)	Distance	Drift%	Exposure	NOAER corr	HQ	Trigger
Orchards, citrus, trees (>2m)						
48	1/3 m	29.20	14.016	3.2	4.38	1
	5 m	19.89	9.547		2.98	
	10 m	11.81	5.669		1.77	
	15 m	5.55	2.664		0.83	
Grapefruits						
48	1/3 m	8.02	3.850	3.2	1.20	1
	5 m	3.62	1.738		0.54	
Leafy vegetables, Fruiting vegetables, Potatoes.						
48	1/3 m	2.77	1.330	3.2	0.42	1

No vegetation distribution factor has been taking into account in the exposure calculation since the exposure in the off-field study is 3D and made on vegetalized fields.

Therefore, the off-risk assesement presented above is considered relevant for non vegetalized off-field areas.

The off-field risk to non-target arthropods is acceptable when GF-2626 is applied considering:

- an unsprayed buffer zone of 15 meters to non-agricultural land for uses on Orchards, Citrus and trees (>2m).
- an unsprayed buffer zone of 5 meters to non-agricultural land for uses on Grapevine.

- no mitigations measures for Leafy and Fruiting vegetables and Potatoes.

IIIA 10.5.1 Using artificial substrates

The following *Aphidius rhopalosiphi* glass-plate toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.1/01, Stevens, J. (2010a)
Title:	A rate-response laboratory test to determine the effects of GF-2626 on the parasitic wasp, <i>Aphidius rhopalosiphi</i> (Hymenoptera: Braconidae).
Document No:	Dow Study ID: 10-13
Guidelines:	Mead-Briggs <i>et al.</i> (2000)
GLP	Yes

Study Comments: IIIA 10.5.1/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.1/01	The 48-h LR ₅₀ = 0.174 mL formulation/ha (nominally 20.88 mg Sulfoxaflor/ha).

The following *Typhlodromus pyri* glass-plate toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.1/02, Fallowfield, L. (2010a)
Title:	A rate-response laboratory test to determine the effects of GF-2626 on the predatory mite, <i>Typhlodromus pyri</i> (Acari: Phytoseiidae).
Document No:	Dow Study ID: 10-12
Guidelines:	Blümel <i>et al.</i> (2000)
GLP	Yes

Study Comments: IIIA 10.5.1/02	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints:	7-day LR ₅₀ = 3200 mL GF-2626/ha (equivalent to 384 g Sulfoxaflor/ha).

IIIA 10.5.1/02	
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IIIA 10.5.2 Extended laboratory studies

The following extended laboratory toxicity study with *Aphidius rhopalosiphi* performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.2/01, Stevens, J. (2010b)
Title:	A rate-response extended laboratory bioassay to determine the effects of GF-2626 on the parasitic wasp, <i>Aphidius rhopalosiphi</i> (Hymenoptera, Braconidae).
Document No:	Dow Study ID: 10-29
Guidelines:	Mead-Briggs <i>et al.</i> (2009)
GLP	Yes

.Study Comments: IIIA 10.5.2/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.2/01	48-hour LR ₅₀ = 7.875 mL GF-2626/ha (equivalent to 0.945 g sulfoxaflor/ha)

The following extended laboratory toxicity study with *Aleochara bilineata* performed on GF-2032 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.2/02, Spincer, D. (2009)
Title:	An extended laboratory test to determine the effects of fresh residues of GF-2032 on the rove beetle, <i>Aleochara bilineata</i> (Coleoptera; Staphylinidae).
Document No:	Dow Study ID: 080089
Guidelines:	Grimm <i>et al.</i> (2000)
GLP	Yes

Study Comments: IIIA 10.5.2/02	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed	LR ₅₀ /ER ₅₀ >100 mL GF- 2032/ha (equivalent to 24 g Sulfoxaflor/ha)

Endpoints: IIIA 10.5.2/02	
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The following extended laboratory toxicity study with *Chrysoperla carnea* performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.2/03, Spincer, D. (2011)
Title:	A rate-response extended laboratory test to determine the effects of GF-2626 on the green lacewing, <i>Chrysoperla carnea</i> (Neuroptera, Chrysopidae).
Document No:	Dow Study ID: 101310;
Guidelines:	Vogt <i>et al.</i> (2000)
GLP	Yes

Study Comments: IIIA 10.5.2/03	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.2/03	LR ₅₀ /ER ₅₀ >400 mL GF-2626/ha (equivalent to 48 g Sulfoxaflor/ha)

Aged residue study

The following aged residue study with *Aphidius rhopalosiphi* performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.2/04, Stevens, J. (2011)
Title:	An aged-residue extended laboratory test to determine the effects of GF-2626 on the parasitic wasp, <i>Aphidius rhopalosiphi</i> (Hymenoptera, Braconidae).
Document No:	Dow Study ID: 10-14
Guidelines:	Mead-Briggs <i>et al.</i> (2009)
GLP	Yes

Study Comments: IIIA 10.5.2/04	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.2/04	<p>The effects of both fresh and field-aged foliar residues of GF-2626 on the parasitic wasp, <i>Aphidius rhopalosiphi</i>, were evaluated under extended laboratory test conditions. Although fresh residues of GF-2626 were harmful to the test insects at treatment rates of 58.33, 200 and 400 mL product/ha, the aged residues showed a clear decline in effects over time.</p> <p>At a treatment rate of 58.33 mL product/ha, the effects of residues were no longer unacceptable by 14 days after treatment. At treatment rates of 200 and 400 mL product/ha, the effects of residues were no longer unacceptable by 21 days after treatment.</p>

IIIA 10.5.3 Semi-field tests

No semi-field data submitted.

IIIA 10.5.4 Field tests

The following field test performed on GF-2626 in SW France was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.4/01, Bakker, F. (2011)
Title:	A “terrestrial mesocosm study” to assess the effects of GF-2626 (a 12 % SC formulation of Sulfoxaflor) on the non-target, surface- and plant-dwelling arthropod fauna of a grassland habitat in SW France, when exposed to low concentrations during spring.
Document No:	Dow Study ID: 101029;
Guidelines:	De Jong 2010 <i>et al.</i> (2010)
GLP	Yes

Study Comments: IIIA 10.5.4/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.4/01	The reported study is GLP compliant and conducted to a standard study protocol without any significant deviation. The test results are in compliance with the guideline’s validity criteria. It is acceptable for regulatory use.

	<p>At the population level no consistent dose related adverse effects from GF-2626 treatments were found, except for the collembolan taxon Bourletiellidae and for aphids. The aphids are target pest organisms for using of GF-2626, therefore the adverse effects are expected. In all rates populations of the family Bourletiellidae were recovered within one or two months after application. Moreover, the effects of GF-2626 on Collembola are covered by the field study on micro-arthropods, as well (see B.9.7.1.2), that concluded a lack of adverse effects on micro-arthropod field community, including Collembola.</p> <p>Hence, no sustained adverse effects on arthropod communities prevailing in grasslands in South-West France are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) is applied at rates of up to 9.6 g Sulfoxaflor/ha.</p>
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The following field test performed on GF-2372 in SW France was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.4/02, Roig, J. (2011)
Title:	A field trial to determine the effects of GF-2372 (a 50% WG formulation of Sulfoxaflor) on the non-target arthropod fauna of arable land after one and two applications to a wheat crop South West France.
Document No:	Dow Study ID: 101030;
Guidelines:	IOBC (Hassan, 1992), Anonymous (1992), ESCORT (Barrett et al., 1994), Brown (1998) and IOBC, BART and EPPO Joint Initiative (Candolfi et al., 2000), De Jong 2010 <i>et al.</i> (2010)
GLP	Yes

Study Comments: IIIA 10.5.4/02	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.4/02	<p>The reference item treatment (one application with dimethoate at 320 g a.s/ha and one application with lambdacyhalothrin at 40 g a.s./ha with a 21 day spray interval) induced severe and statistically significant effects on populations in all arthropod orders. At the end of the season the community as a whole had recovered, but at the population level some adverse effects persisted throughout the sampling period until spring next season.</p> <p>GF-2372 applied once at a rate of 24 or 48 g Sulfoxaflor/ha, or twice at 24 g Sulfoxaflor/ha with a spray interval of 21 days, induced moderate and transient but statistically significant adverse effects on populations of</p>

	<p>certain orders (mainly Homoptera, Hymenoptera and few Diptera and Collembola). Recovery was seen for all these taxa within one or two months after the first application. There was no clear differentiation in effects related to test rate or application frequency. For few hymenopteran taxa the recovery period was slightly longer in the 2 x 24 g Sulfoxaflor/ha rate. One mite taxon (Stigmaeidae) showed a delayed but persistent adverse effect in the 2 x 24 g Sulfoxaflor/ha treatment, but differences compared to the control were statistically significant only on one sampling moment (ca 3 months after the second application).</p> <p>These findings were confirmed by community analyses, although the observed responses of the arthropod communities were not statistically significant for any of the GF-2372 treatments tested.</p> <p>It is concluded, that no sustained adverse effects on arthropod communities prevailing in a commercial cereal field in Southern Europe (France) are likely to occur, when GF-2372 (active ingredient Sulfoxaflor) is applied at rates of up to 48 g Sulfoxaflor/ha.</p>
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The following field test performed on GF-2372 in the Netherlands was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.5.4/03, Bakker, F. (2011)
Title:	A field trial to determine the effects of GF-2372 (a 50% WG formulation of Sulfoxaflor) on the non-target arthropod fauna of arable land after one and two applications to a wheat crop in the Netherlands
Document No:	Dow Study ID: 101031
Guidelines:	IOBC (Hassan, 1992), Anonymous (1992), ESCORT (Barrett et al., 1994), Brown (1998) and IOBC, BART and EPPO Joint Initiative (Candolfi et al., 2000), De Jong 2010 <i>et al.</i> (2010)
GLP	Yes

Study Comments: IIIA 10.5.4/03	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.5.4/03	The reference item treatment (one application with dimethoate at 320 g a.s./ha and one application with lambdacyhalothrin at 40 g a.s./ha with a 21 day spray interval) induced severe and statistically significant effects on populations in all arthropod orders. At the end of the season the community as a whole had recovered, but at the population level some adverse effects persisted throughout the sampling period until spring next season.

	<p>GF-2372 applied once at a rate of 24 or 48 g Sulfoxaflor/ha, or twice at 24 g Sulfoxaflor/ha with a spray interval of 21 days, induced moderate and transient but statistically significant adverse effects on populations of certain orders (mainly Homoptera, Hymenoptera and few Diptera and Collembola). Recovery was seen for all these taxa within one or two months after the first application. There was no clear differentiation in effects related to test rate or application frequency. For few hymenopteran taxa the recovery period was slightly longer in the 2 x 24 g Sulfoxaflor/ha rate. One mite taxon (Stigmaeidae) showed a delayed but persistent adverse effect in the 2 x 24 g Sulfoxaflor/ha treatment, but differences compared to the control were statistically significant only on one sampling moment (ca 3 months after the second application).</p> <p>These findings were confirmed by community analyses, although the observed responses of the arthropod communities were not statistically significant for any of the GF-2372 treatments tested.</p> <p>It is concluded, that no sustained adverse effects on arthropod communities prevailing in a commercial cereal field in Southern Europe (France) are likely to occur, when GF-2372 (active ingredient Sulfoxaflor) is applied at rates of up to 48 g Sulfoxaflor/ha.</p>
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IIIA 10.6 Effects on Earthworms and Other Soil Non-target Macro-organisms

GF-2626 was one of the representative formulations in the EU review of sulfoxaflor. However new risk assessment parameters are now considered in the assessment of risk to earthworms and soil macro-organisms and hence an appropriate risk assessment with the proposed use pattern is provided and is considered adequate. The risk assessment has been conducted in line with the Terrestrial Guidance Document (SANCO/10329/2002, rev. 2 final).

The critical endpoints employed in the risk assessment for earthworms and other soil non-target organisms are indicated in the tables below.

Table 10.6-1: EU Endpoints - Toxicity of sulfoxaflor and relevant soil metabolites X11719474 and X11519540 to earthworms and soil macro-organisms

Compound	Test species	Test design	EU agreed endpoints* (mg/kg soil)
Earthworms			
Sulfoxaflor	<i>Eisenia fetida</i>	acute, 14 days (10% peat in test soil)	LC ₅₀ = 0.885
X11719474		acute, 14 days (10% peat in test soil)	LC ₅₀ >1000**
Sulfoxaflor	<i>Eisenia fetida</i>	chronic, 56 days (10% peat in test soil)	NOEC = 0.1
X11719474		chronic, 56 days (10% peat in test soil)	NOEC = 10**
X11519540		chronic, 56 days (10% peat in test soil)	NOEC = 10**
Other soil non-target organisms			
X11719474	<i>Folsomia candida</i>	chronic, 28 d (5% peat in test soil)	NOEC = 10**
X11519540			NOEC = 10**
X11519540	<i>Hypoaspis aculeifer</i>	chronic, 14 d (5% peat in test soil)	NOEC = 10**

* EFSA Journal (2014); 12(5):3692

** The highest concentration tested.

Endpoints used in the risk assessment are in **bold**.

The EPPO correction factor (2) does not need to be applied to the endpoints as the log Pow of sulfoxaflor is < 2

The available data for GF-2626 are summarised in the following table.

Table 10.6-2: EU Endpoints - Toxicity of GF-2626 to earthworms and soil macro-invertebrates

Compound	Test species	Test design	EU agreed endpoints*
GF-2626	<i>Eisenia foetida</i>	acute, 14 days (10% peat in test soil)	LC ₅₀ = 5.527 mg GF-2626/kg LC₅₀ = 0.66 mg Sulfoxaflor/kg
	<i>Eisenia foetida</i>	chronic, 56 days (10% peat in test soil)	NOEC = 0.75 mg GF-2626/kg NOEC = 0.09 mg Sulfoxaflor/kg
	<i>Folsomia candida</i>	chronic, 28 d (5% peat in test soil)	NOEC = 2.67 mg GF-2626/kg NOEC = 0.3204 mg Sulfoxaflor/kg
	<i>Hypoaspis aculeifer</i>	chronic, 14 d (5% peat in test soil)	NOEC = 100 mg GF-2626/kg NOEC = 12 mg Sulfoxaflor/kg

Field study on earthworms:

An earthworm field study was conducted to investigate effects of GF-2626 (SC formulation containing 120 g/L of Sulfoxaflor) and its metabolite X11719474 on the earthworm fauna in Southern Germany.

Three application scenarios were used in the study:

T1: first application of 4.8 g/ha X11719474 (plateau concentration 1) plus second application of 24 g Sulfoxaflor/ha applied as GF-2626 after one week

T2: first application of 9.6 g/ha X11719474 (plateau concentration 2) plus a second application of 24 g Sulfoxaflor/ha applied as GF-2626 after one week plus a third application of 24 g Sulfoxaflor/ha applied as GF-2626 four weeks after the first application

T3: first application of 9.6 g/ha X11719474 (plateau concentration 2) plus a second application of 48 g Sulfoxaflor/ha applied as GF-2626 after one week.

All validity criteria were met due to the high earthworm abundance, the presence of key earthworm species of different ecological types (epigeic, endogeic and anecic) and the homogeneity in abundance and species distribution at the field site. The effect of the toxic reference treatment indicated the sensitivity of the earthworm population. The time of applications during high activity of earthworms and additional irrigation in the time after the application guaranteed the exposure of earthworms to the test item and the toxic reference item.

After application of GF-2626 and its metabolite X11719474 applied to field plots no adverse effects on total earthworm numbers occurred in any of the samplings. No significant reductions in numbers and weights of earthworm species, groupings or totals were found in any of the samplings.

Hence, no sustained adverse effects on an earthworm field community are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) and its metabolite X11719474 are applied at rates of up to 48 g Sulfoxaflor/ha and 9.6 g X11719474/ha, respectively.

Field study on soil micro-arthropods:

A field study was conducted to assess possible effects of GF-2626 (SC formulation containing 120 g/L of Sulfoxaflor) and its metabolite X11719474 on soil living invertebrates (Collembola, Acari) under field conditions on a grassland in Southern Germany. For this purpose community composition and abundance of selected soil living invertebrates were monitored over the period of one year.

Three application scenarios were used in the study:

T1: first application of 4.8 g/ha X11719474 (plateau concentration 1) plus second application of 24 g Sulfoxaflor/ha applied as GF-2626 after one week

T2: first application of 9.6 g/ha X11719474 (plateau concentration 2) plus a second application of 24 g Sulfoxaflor/ha applied as GF-2626 after one week plus a third application of 24 g Sulfoxaflor/ha applied as GF-2626 four weeks after the first application

T3: first application of 9.6 g/ha X11719474 (plateau concentration 2) plus a second application of 48 g Sulfoxaflor/ha applied as GF-2626 after one week.

After application of GF-2626 and its metabolite X11719474 applied to field plots no adverse effects on soil living micro-arthropod numbers occurred in any of the samplings. No significant or persistent treatment related reductions were observed in any of the test item treatment.

Hence, no sustained adverse effects on soil micro-arthropod field communities are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) and its metabolite X11719474 are applied at rates of up to 48 g Sulfoxaflor/ha and 9.6 g X11719474/ha, respectively.

* EFSA Journal (2014); 12(5):3692

Endpoints used in the risk assessment are in **bold**.

The EPPO correction factor (2) does not need to be applied to the endpoints as the log Pow of sulfoxaflor is < 2

In accordance with the GAPs (Table 10-2), applications to pome/stone fruit, brassicas and potatoes are used as worst case scenarios.

PEC_{soil} values for sulfoxaflor and for its potentially relevant metabolites (X11719474 and X11519540) following applications to pome/stone fruit, brassicas and potatoes are summarised in Section 5, Points IIIA 9.4 and IIIA 9.5, respectively.

Table 10.6-4: TERs for earthworms and soil macro-organisms after applications of GF-2626 in pome/stone fruit and potatoes (worst-case scenarios)

Test substance	PEC (mg/kg)	Species	Timescale	LC ₅₀ or NOEC (mg/kg)	TER	Trigger value
GF-2626	0.022 (a.s.) (pome/stone fruit)	<i>E. foetida</i>	Acute	0.66 (a.s.)	30.0	10
		<i>E. foetida</i>	Long-term	0.09 (a.s.)	4.09	5
		<i>F. candida</i>	Long-term	0.3204 (a.s.)	14.6	5
		<i>H. aculeifer</i>	Long-term	12 (a.s.)	546	5
Sulfoxaflor	0.022 (a.s.) (pome/stone fruit)	<i>E. foetida</i>	Acute	0.885	40.2	10
		<i>E. foetida</i>	Long-term	0.1	4.55	5
X11719474	0.033 (potatoes)	<i>E. foetida</i>	Acute	>1000	> 30303	10
	0.043 (potatoes)	<i>E. foetida</i>	Long-term	10	233	5
		<i>F. candida</i>	Long-term	10	233	5
X11519540	0.007 (potatoes)	<i>E. foetida</i>	Long-term	10	1429	5
		<i>F. candida</i>	Long-term	10	1429	5
		<i>H. aculeifer</i>	Long-term	10	1429	5

TERs shown in **bold** fall below the relevant trigger.

A low acute and chronic risk to earthworms and other soil non-target organisms from sulfoxaflor, its relevant soil metabolites and GF-2626 formulation has been demonstrated with the exception of the long-term risk to earthworms and *Folsomia candida* from sulfoxaflor and GF-2626 for the proposed worst-case use in pome/stone fruit. However the results of field studies on earthworms and soil micro-arthropods that have been submitted, indicated a lack of adverse effects on earthworm and soil micro-arthropod field communities under field conditions when GF-2626 and its metabolite X11719474 are applied at rates of up to 48 g sulfoxaflor/ha and 9.6 g X11719474/ha, respectively. It can be concluded that the proposed uses of the representative formulation GF-2626 on citrus, pome/stone fruit, fruiting vegetables, brassicas, potatoes, beans/peas and ornamentals pose an acceptable risk to earthworms and other soil macro-organisms.

IIIA 10.6.1 Toxicity exposure ratios, TER_A and TER_{LT}**Acute risk**

Acute toxicity exposure ratios (TERs) for the proposed uses of GF-2626 in ornamentals (worst case scenarios) are presented in Table 10.6.1-1.

Table 10.6.1-1: Acute TER values for earthworms

Test compound	Crop	LC ₅₀ (mg a.s./kg)	PECsoil (mg a.s./kg)	TER _A	Trigger value
GF-2626	Ornamentals	0.66 (a.s.)	0.0576	11.5	10
Sulfoxaflor		0.885	0.0576	15.4	
X11719474		> 1000	0.127 (plateau)	>7000	

All the acute TER values are higher than the acute trigger value of 10, indicating that GF-2626 poses an acceptable acute risk to earthworms when applied according to the proposed uses of GF-2626 on pome/stone fruit, brassicas and potatoes.

Long-term risk

Long-term toxicity exposure ratios (TERs) for the proposed use of GF-2626 in pome/stone fruit, brassicas and potatoes (worst case scenarios) are presented in Tables 10.6.1-2 and 10.6.1-3.

Table 10.6.1-2: Chronic TER values for earthworms

Substance	Crop	NOEC (mg a.s./kg)	PECsoil (mg a.s./kg)	TER _{LT}	Trigger value
GF-2626	Ornamentals	0.09	0.0576	1.6	5
Sulfoxaflor		0.1	0.0576	1.7	
X11719474		10	0.127 (plateau)	78.7	
X11519540		10	0.032 (plateau)	312.5	

TERs in **bold** are below the trigger value

The resulting TER_{LT} values for sulfoxaflor and its soil metabolites are above the trigger value of 5 indicating an acceptable chronic risk to earthworms, except for application to pome/stone fruit. The TER_{LT} values for GF-2626 are below the trigger value of 5 for applications to pome/stone fruit and brassicas indicating a potential long-term risk to earthworms.

The results of the earthworm field study indicated a lack of adverse effects on earthworm field community under field conditions when GF-2626 and its metabolite X11719474 are applied at rates of up to 48 g sulfoxaflor/ha and 9.6 g X11719474/ha, respectively. Therefore, it can be concluded that the proposed uses of GF-2626 on citrus, pome/stone fruit, fruiting vegetables, brassicas, potatoes, beans/peas and ornamentals pose an acceptable risk to earthworms.

Table 10.6.1-3: Chronic TER values for soil macro-organisms

Substance	Crop	NOEC (mg a.s./kg)	PECsoil (mg a.s./kg)	TER _{LT}	Trigger value
Folsomia candida					
GF-2626	Ornamentals	0.3204	0.0576	5.5	5
X11719474		10	0.127 (plateau)	78.7	
X11519540		10	0.032 (plateau)	312.5	
Hypoaspis aculeifer					
GF-2626	Ornamentals	12	0.0576	208.3	5
X11519540		10	0.032 (plateau)	312.5	

TER in **bold** is below the trigger value

The resulting TER_{LT} for GF-2626 and sulfoxaflor soil metabolites are all above the trigger value of 5. Therefore, an acceptable sublethal risk to other soil macroorganisms can be concluded for all proposed uses of the active substance in the formulation GF-2626.

These findings are supported by the results of the field study on soil micro-arthropods (Collembola, Acari), that indicated a lack of adverse effects on soil micro-arthropod field communities under field conditions when GF-2626 and its metabolite X11719474 are applied at rates of up to 48 g sulfoxaflor/ha and 9.6 g X11719474/ha, respectively. Therefore, it can be concluded that the proposed uses of GF-2626 on citrus, pome/stone fruit, fruiting vegetables, brassicas, potatoes, beans/peas and ornamentals pose an acceptable risk to soil macro-organisms.

IIIA 10.6.2 Acute toxicity

The following acute toxicity study with earthworms performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.2/01, McCormac, A. (2010a)
Title:	Determination of acute toxicity of GF-2626 to the earthworm <i>Eisenia fetida</i> in an artificial soil substrate.
Document No:	Dow Study ID: 101913
Guidelines:	OECD 207
GLP	Yes

Study Comments: IIIA 10.6.2/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.6.2/01	LC ₅₀ = 5.527 mg GF-2626/kg soil dry weight (equivalent to 0.66 mg Sulfoxaflor/kg soil)

IIIA 10.6.3 Sublethal effects

The following chronic toxicity study with earthworms performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.3/01, McCormac, A. (2010b)
Title:	Determination of chronic (sub-lethal) toxicity of GF-2626 to the earthworm <i>Eisenia fetida</i> in an artificial soil substrate.
Document No:	Dow Study ID: 101304
Guidelines:	OECD 222
GLP	Yes

Study Comments: IIIA 10.6.3/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.6.3/01	In artificial soil containing 10% peat as the test substrate: 56-days NOEC = 0.75 mg GF-2626/kg soil dry weight (equivalent to 0.09 mg Sulfoxaflor/kg soil)

IIIA 10.6.4 Field tests

The following field study with earthworms performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.4/01, Klein, O. (2012)
Title:	Field Study to Evaluate the Effects of Sulfoxaflor (as GF-2626 12% SC formulation) and its primary soil metabolite X11719474 on Earthworms in Southern Germany.
Document No:	Dow Study ID: 110844
Guidelines:	Kula & Kula (1994 - BBA guideline for testing the effects of pesticides on earthworms in the field), ISO Guideline 11268-3 (1999), ISO Guideline 23611-1 (2006)
GLP	Yes

Study Comments: IIIA 10.6.4/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
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Agreed Endpoints: IIIA 10.6.4/01	After application of GF-2626 and its metabolite X11719474 applied to field plots no adverse effects on total earthworm numbers occurred in any of the samplings. No significant reductions in numbers and weights of earthworm species, groupings or totals were found in any of the samplings. No sustained adverse effects on an earthworm field community are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) and its metabolite X11719474 are applied at rates of up to 48 g Sulfoxaflor/ha and 9.6 g X11719474/ha, respectively.
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IIIA 10.6.5 Residue content of earthworms

Based on the acceptable risk to earthworms following the proposed uses of GF-2626 and on the low bioaccumulation tendency of Sulfoxaflor, studies to determine the residue content of earthworms are not required.

IIIA 10.6.6 Effects on other non-target macro-organisms

Data on effects on soil macro-organisms other than earthworms are only required where the field DT_{90} is > 100 days.

The maximum field DT_{90f} for sulfoxaflor is estimated to be 24.68 days (Section 5, Point IIIA 9.1). Therefore, studies on the effects of sulfoxaflor on other non-target macro-organisms are not triggered because the DT_{90f} is less than 100 days.

For the relevant soil metabolites X11719474 and X11519540 the maximum field DT_{90f} values are 1279 and 3838 days, respectively (Section 5, Point IIIA 9.1). Given that the DT_{90f} is > 100 days the need to address effects on other non-target macro-organisms is triggered and collembola (*Folsomia candida*) reproductive toxicity studies and gammasid mite (*Hypoaspis aculeifer*) reproductive toxicity studies for these metabolites have been provided. A study on the effects of metabolite X11719474 on the soil mite *Hypoaspis aculeifer* was not submitted as a higher tier litter bag study had been carried out with GF-2626 and metabolite X11719474 (ref to Section IIIA 10.6.7).

The following reproductive toxicity studies with collembola (*Folsomia candida*) and gammasid mite (*Hypoaspis aculeifer*) performed on GF-2626 were assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.6/01, Witte, B. (2010)
Title:	Effects of GF-2626 on Reproduction of the Collembola <i>Folsomia candida</i> in Artificial Soil with 5% Peat.
Document No:	Dow Study ID: 101311.
Guidelines:	OECD 232 (2009), ISO 11267 (1999)
GLP	Yes

Study Comments: IIIA 10.6.6/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.6.6/01	28 days NOEC = 2.67 mg GF-2626/kg soil dry weight (equivalent to 0.3204 mg Sulfoxaflor/kg).

Report:	IIIA 10.6.6/02, Witte, B. (2011)
Title:	GF-2626: Effects of GF-2626 on Reproduction of the Predatory Mite <i>Hypoaspis aculeifer</i> in Artificial Soil with 5% Peat.
Document No:	Dow Study ID: 102001
Guidelines:	OECD 226 (2008)
GLP	Yes

Study Comments: IIIA 10.6.6/02	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.6.6/02	14-day NOEC = 100 mg GF-2626/kg soil (equivalent to 12 mg sulfoxaflor/kg)

The following study on micro-arthropod field community performed on GF-2626 and the metabolite X11719474 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.6/03, Mack, P. (2012)
Title:	Field Study to Evaluate the Effects of Sulfoxaflor (as GF-2626 12% SC formulation) and its primary soil metabolite X11719474 on Soil Micro-Arthropods in Southern Germany.
Document No:	Dow Study ID: 110845
Guidelines:	ISO Guideline 23611-2 (2006), OECD 56 (2006)
GLP	Yes

Study Comments: IIIA 10.6.6/03	Already reviewed in the EU DAR for Sulfoxaflor (2013)
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Agreed Endpoints: IIIA 10.6.6/03	After application of GF-2626 and its metabolite X11719474 applied to field plots no adverse effects on soil living micro-arthropod numbers occurred in any of the samplings. No significant or persistent treatment related reductions were observed in any of the test item treatment. Hence, no sustained adverse effects on soil microarthropod field communities are likely to occur, when GF-2626 (active ingredient Sulfoxaflor) and its metabolite X11719474 are applied at rates of up to 48 g Sulfoxaflor/ha and 9.6 g X11719474/ha, respectively.
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IIIA 10.6.7 Effects on organic matter breakdown

Data on the impact on soil organic matter breakdown are only required where the field DT_{90} is >365 days.

The maximum field DT_{90f} for sulfoxaflor is estimated to be 24.68 days (Section 5, Point IIIA 9.1). Therefore, studies on the effects of Sulfoxaflor on organic matter breakdown are not triggered because the DT_{90f} is less than 100 days.

For the relevant soil metabolites X11719474 and X11519540 the maximum field DT_{90f} values are 1279 and 3838 days, respectively (Section 5, Point IIIA 9.1). Given the high soil persistence of the metabolites X11719474 and X11519540 (DT_{90} 's > 365 days), data on the impact on organic matter breakdown are required. A litter bag study carried out with GF-2626 and the metabolite X11719474 has been submitted. Since no impact on the organic matter breakdown was determined in this study (conducted up to 48 g sulfoxaflor/ha plus 9.6 g X11719474/ha), and given no effects of the metabolite X11519540 on the reproduction of Collembola and gamasid mites were reported, no further studies are needed.

The following study on effects on organic matter breakdown performed on GF-2626 and the metabolite X11719474 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.6.7/01, Mack, P. (2011)
Title:	Field Study to Evaluate the Effects of Sulfoxaflor (as GF-2626 12% SC formulation) and its primary soil metabolite X11719474 on the Decomposition of Organic Matter in the Field.
Document No:	Dow Study ID: 110602
Guidelines:	“EPFES” workshop, Lisbon, April 2002 (RÖMBKE et al. 2003), OECD 56 (2006)
GLP	Yes

Study Comments: IIIA 10.6.7/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
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Agreed Endpoints: IIIA 10.6.7/01	Sulfoxaflor (as GF-2626) and its metabolite X11719474 had no adverse effects on the breakdown of buried organic material (straw) compared to a water treated control after exposure of about 1, 3, 6 and 9 months
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IIIA 10.7 Effects on Soil Microbial Activity

Overall summary

Effects on soil microbial activity of GF-2626 were evaluated as part of the EU review of sulfoxaflor. An appropriate risk assessment has been conducted in line with the Terrestrial Guidance Document (SANCO/10329/2002, rev. 2 final) and is considered adequate.

The endpoints employed in the risk assessment for effects on soil microbial activity are indicated in Table 10.7-1.

Table 10.7-1: EU Endpoints – Effects of sulfoxaflor, GF-2626 and relevant soil metabolites on soil microbial activity

Compound	Test type	EU agreed endpoints*
Sulfoxaflor	N transformation	< 25 % effect at day 28 at 0.33 mg a.s./kg d.w. soil (240 g a.s./ha)
	C transformation	< 25 % effect at day 28 at 0.33 mg a.s./kg d.w. soil (240 g a.s./ha)
GF-2626	N transformation	< 25 % effect at day 28 at 2.85 mg prep./kg d.w. soil 0.32 mg a.s./kg d.w. soil (240 g a.s./ha)
	C transformation	< 25 % effect at day 28 at 2.85 mg prep./kg d.w. soil 0.32 mg a.s./kg d.w. soil (240 g a.s./ha)
X11719474	N transformation	< 25 % effect at day 28 at 0.16 mg a.s./kg d.w. soil (120 g a.s./ha)
	C transformation	< 25 % effect at day 28 at 0.16 mg a.s./kg d.w. soil (120 g a.s./ha)
X11519540	N transformation	< 25 % effect at day 28 at 0.32 mg a.s./kg d.w. soil (240 g a.s./ha)
	C transformation	< 25 % effect at day 28 at 0.32 mg a.s./kg d.w. soil (240 g a.s./ha)

* EFSA Journal (2014); 12(5):3692

In accordance with the GAPs (Table 10-2), applications to pome/stone fruit, brassicas and potatoes are used as worst case scenarios.

PEC_{soil} values for sulfoxaflor and for the potentially relevant metabolites (X11719474 and X11519540) following applications to ornamentals (worst-case scenarios) are summarised in Section 5, Points IIIA 9.4 and IIIA 9.5, respectively.

Conclusion

TERs are summarised in Table 10.7-2.

Table 10.7-2: Minimum TERs for soil microbial activity after uses of GF-2626 in pome/stone fruit, brassicas and potatoes (worst-case scenarios)

Substance	Test type	Timescale	Maximum PEC _{soil} (mg/kg soil)	NOEC (mg/kg soil)	TER
Ornamentals					
GF-2626	N transformation	28 days	0.0576	0.32 (a.s.)	5.6
	C transformation	28 days			
Sulfoxaflor	N transformation	28 days	0.0576	0.33	5.7
	C transformation	28 days			
X11719474	N transformation	28days	0.127	0.16	1.3
	C transformation	28 days			
X11519540	N transformation	28 days	0.032	0.32	10
	C transformation	28 days			

The TER values are all above 1, indicating that the predicted environmental concentrations of GF-2626, sulfoxaflor and the metabolites X11719474 and X11519540 from the proposed uses of GF-2626 on citrus, pome/stone fruit, fruiting vegetables, leafy vegetables, potatoes, beans, peas and ornamentals will have no unacceptable effects on soil microorganisms.

IIIA 10.7.1 Laboratory testing

The following soil microbial toxicity study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.7.1/01, Feil, N. (2011)
Title:	Effects of GF-2626 on the Activity of the Soil Microflora in the Laboratory
Document No:	Dow Study ID: 101912 & 101917
Guidelines:	OECD 216, 217
GLP	Yes

Study Comments: IIIA 10.7.1/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.7.1/01	The results indicate a lack of adverse effects on soil microbial respiration and nitrogen transformation at the maximum test dose of 2.85 mg GF-2626/kg soil dry weight, i.e. 0.32 mg Sulfoxaflor/kg soil dry weight (corresponding to the application rate of 2 L GF-2626/ha, i.e. equal to 240 g Sulfoxaflor/ha).

IIIA 10.7.2 Additional testing

No additional studies with GF-2626 are required.

IIIA 10.8 Effects on Non-Target Plants

IIIA 10.8.1 Terrestrial plants

Overall summary

GF-2626 was the one of the representative formulations in the EU review of sulfoxaflor. However new risk assessment parameters are now considered in the assessment of risk to terrestrial plants and hence an appropriate risk assessment with the proposed use pattern is provided and is considered adequate. The risk assessment has been conducted in line with the Terrestrial Guidance Document (SANCO/10329/ 2002, rev. 2 final).

The critical endpoints employed in the risk assessment for non-target plants are indicated in the table below.

Table 10.8.1-1: EU Endpoints - Toxicity of GF-2626 to terrestrial non-target plants

Compound	Most sensitive species	Endpoint	EU agreed endpoints*
GF-2626	All plant species tested	Vegetative vigour	ER ₅₀ > 96 g a.s./ha**
GF-2626	All plant species tested	Seedling emergence	ER ₅₀ > 96 g a.s./ha**

* EFSA Journal (2014); 12(5):3692

** The highest rate tested

Sulfoxaflor is not a herbicide, nor shows phytotoxic or growth regulating effects. The non-target plant study carried out with GF-2626 indicates that no significant adverse effects on 11 species of non-target plants were observed at a nominal application rate of up to 96 g sulfoxaflor/ha (formulated as GF-2626) in seedling emergence and vegetative vigour tests. The maximum field single application rate proposed for GF-2626 is 48 g Sulfoxaflor/ha. Since there is no data indicating > 50 % phytotoxic effects on any test species at the maximum application rate an acceptable risk to non-target plants can be concluded for the proposed uses of GF-2626.

Conclusion

An acceptable risk to non-target terrestrial plants has been demonstrated for the proposed uses of GF-2626 on citrus, pome/stone fruit, fruiting vegetables, leafy vegetables, potatoes, beans, peas and ornamentals.

IIIA 10.8.1.1 Seed germination

This is not an EC data requirement.

IIIA 10.8.1.2 Vegetative vigour

The following vegetative vigour study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.8.1.2/01, Rockliff, C. (2011a)
Title:	Evaluation of the phytotoxicity of GF-2626 (Sulfoxaflor, 120 g as/l, SC) GLP vegetative vigour test terrestrial non target plants (based on OECD Guideline 227) – Europe, 2011.
Document No:	Dow Study ID: 101951
Guidelines:	OECD 227
GLP	Yes

Study Comments: IIIA 10.8.1.2/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed Endpoints: IIIA 10.8.1.2/01	The results indicate a lack of adverse effects on vegetative vigour to any of the eleven test species at up to 96 g Sulfoxaflor/ha. The regulatory endpoint is EC ₅₀ for visual injury and foliar fresh weight >96 g Sulfoxaflor/ha (the highest rate tested) for all plant species tested.

IIIA 10.8.1.3 Seedling emergence

The following seedling emergence study performed on GF-2626 was assessed in the EU review and is available in the DAR (2013) Annex B.9.

Report:	IIIA 10.8.1.3/01, Rockliff, C. (2011b)
Title:	Evaluation of the phytotoxicity of GF-2626 (Sulfoxaflor, 120 g as/l, SC) GLP seedling emergence and seedling growth test terrestrial non-target plants (Based on OECD Guideline 208) – Europe, 2011.
Document No:	Dow Study ID: 101952
Guidelines:	OECD 208
GLP	Yes

Study Comments: IIIA 10.8.1.3/01	Already reviewed in the EU DAR for Sulfoxaflor (2013)
Agreed	The results indicate a lack of adverse effects on seedling emergence and

Endpoints: IIIA 10.8.1.3/01	growth to any of the eleven test species at up to 96 g Sulfoxaflor/ha. The regulatory endpoint is EC ₅₀ for fresh weight, seedling emergence and visual injury >96 g Sulfoxaflor/ha (the highest rate tested) for all plant species tested.
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IIIA 10.8.1.4 Field testing

No additional studies with GF-2626 are required.

IIIA 10.8.2 Aquatic plants

Please refer to Point IIIA 10.2.1.12

IIIA 10.8.2.1 *Lemna* growth test

No *Lemna* toxicity study has been performed with the formulation GF-2626.

IIIA 10.8.2.2 Field tests

Field studies are not required and have not been submitted.

IIIA 10.9 Other Non-Target Species (Flora and Fauna)

IIIA 10.9.1 Available preliminary data on other non-target species (flora and fauna)

No additional relevant data available.

IIIA 10.9.2 Critical assessment of relevance of preliminary test data

The potential impact on non-target organisms following the application of GF-2626 on the crops listed in the GAP can be assessed adequately based on the information presented in the preceding Annex points.

IIIA 10.10 Other/Special Studies

IIIA 10.10.1 Laboratory studies

No additional relevant data available.

IIIA 10.10.2 Field studies

No additional relevant data available.

IIIA 10.11 Summary and Evaluation of Points 9 and 10.1-10.10

IIIA 10.11.1 Predicted distribution and fate in the environment and time courses involved

The predicted distribution and fate of GF-2626 in the environment is described in Part B, Section 5.

IIIA 10.11.2 Non-target species at risk and extent of potential exposure

Birds and mammals

The avian risk assessment, conducted in accordance with the EFSA Bird and Mammal Guidance Document (2009), indicated acceptable acute and chronic risk to birds from sulfoxaflor following application of GF-2626 at all proposed label rates, based on a worst-case screening assessment. For mammals, a refined assessment is considered necessary for long term risk to small herbivorous mammal “vole”. A refined risk assessment was conducted (refinement of DF) which demonstrated an acceptable chronic risk to mammals for GF-2626 when applied to fruiting vegetables, orchards (citrus and pome/stone fruit), ornamentals, leafy vegetables and pulses.

In addition, the risk assessment for exposure *via* drinking water demonstrated an acceptable risk for all proposed uses of GF-2626.

Since sulfoxaflor does not have a log P_{ow} value ≥ 3 , risk assessments for birds and mammals feeding on fish and earthworms are not necessary for this active substance.

Aquatic organisms

The risk to aquatic organisms was assessed based on the Aquatic Guidance Document (Sanco/3268/2001). The results of the risk assessment demonstrated an acceptable risk to aquatic organisms from the proposed uses of GF-2626 :

- without mitigations measures for Aubergines, Beans, Brassicas, Bulbs, Ornamentals (< 50 cm), Flowers, Cucurbits, Grapefruit, Leaf vegetables, Peas, Pepper, Potatoes, Tomatoes, Lemons, Mandarins, Oranges,
- with a 5-m buffer zone for Apples, Peaches and Nectarines, Pears and Plums and Cherries, Ornamentals (Trees, bushes and roses)

Effects on bees

It is concluded that the risk to honeybees is acceptable when the product is applied before flowering. Pre-flowering application made 5 days before flowering is considered sufficiently protective by zRMS. The following mitigation measure must be applied: “Do not use where bees are actively foraging/ Do not apply 5 days before and during flowering.”

Therefore, considering flowering plants other than crops, a mitigation measure is considered needed: “Do not apply when flowering weeds are present”

Finally, no information has been provided concerning the honeydew production and the possible way of transfer and exposure of Sulfoxaflor to bees. Then the following mitigation measure must be applied for all intended uses: “To protect bees and pollinating insects do not apply to crop plants when in flower or during the honeydew production period”.

This conclusion is considered conservative for bumble bees.

Effects on other non-target arthropod species

The risk assessment for non-target arthropods was conducted in line with ESCORT 2 (Candolfi *et al.*, 2001), based on data for the proposed formulated product (GF-2626) as well as GF-2372 and GF-2032. It was considered appropriate to extrapolate toxicity data for these products to GF-2626, due to the comparable toxicity to non-target arthropods. The first tier risk assessment demonstrated acceptable off-field and in-field risks to *T. pyri* for all the proposed uses of GF-2626. However, the in-field and off-field HQs for *A. rhopalosiphii* indicated the need for a further risk assessment.

Field studies conducted with GF-2372 and GF-2626 demonstrated the potential for recovery of arthropod populations within a year. On this basis the in-field risk to non-target arthropods was considered acceptable.

The off-field risk to non-target arthropods is acceptable when GF-2626 is applied considering:

- an unsprayed buffer zone of 15 meters to non-agricultural land for uses on Orchards, Citrus and trees (>2m).
- an unsprayed buffer zone of 5 meters to non-agricultural land for uses on Grapevine.
- no mitigations measures for Leafy and Fruiting vegetables and Potatoes.

Effects on earthworms and other soil macro-organisms

The risk to earthworms and other soil macro-invertebrates was assessed in line with the Guidance Document on Terrestrial Ecotoxicology (SANCO/10329/2002). The calculated TER_A and TER_{LT} values were greater than the respective trigger values for sulfoxaflor and the potentially relevant metabolites X11719474 and X11519540, indicating acceptable acute and chronic risks to earthworms and other soil non-target organisms from the proposed uses of GF-2626. However, the TER_{LT} values for sulfoxaflor and GF-2626 were below the trigger value of 5 indicating a potential long-term risk to earthworms.

Based on the results of the field studies on earthworms and soil micro-arthropods (Collembola, Acari) it was concluded that all proposed uses of GF-2626 posed an acceptable risk to soil macro-organisms.

Effects on soil micro-organisms

The risk to soil micro-organisms was assessed in line with the Guidance Document on Terrestrial Ecotoxicology (SANCO/10329/2002). When applying GF-2626 according to the proposed representative GAPs on citrus, pome/stone fruit, fruiting vegetables, leafy vegetables, potatoes, beans, peas and ornamentals, no negative effects on microbial activities are to be expected.

Effects on non-target plants

The potential risk to non-target terrestrial plants from the proposed uses of GF-2626 was evaluated using the recommendations presented in the Guidance Document on Terrestrial Ecotoxicology (SANCO/10329/2002, rev. 2 final). Since there were no data indicating > 50 % phytotoxic effects on any test species at the maximum application rate an acceptable risk to non-target plants was concluded for the proposed uses of GF-2626.

IIIA 10.11.3 Short and long term risks for non-target species, populations, communities and processes

There are no additional European requirements for formulated products.

IIIA 10.11.4 Risk of fish kills and fatalities in large vertebrates or terrestrial predators

There are no additional European requirements for formulated products.

IIIA 10.11.5 Precautions necessary to avoid/minimise environmental contamination and to protect non-target species

Please see IIIA 10.11.12

Appendix 1: List of data submitted in support of the evaluation

The submitted studies are reported in the DAR of the Sulfoxaflor (2013)

Annex Point/ Reference Number	Author(s)	Year	Title Source (where different from the Company), Company, Report Number, GLP or GEP status (where relevant), Published or not	Data Protection claimed (Y/N)	Relied on ? Y/N	Owner
IIIA 10.4.7/04	Liepold, K.	2011	A Semi-field Study to Investigate Residues in Honeybee Products (<i>Apis mellifera carnica</i> L.; (Hymenoptera, Apidae) in <i>Phacelia tanacetifolia</i> in Germany in 2010. Eurofins Agrosience Services GmbH Eutinger Str. 24 D-75223 Niefern-Öschelbronn Germany DAS Study ID: 110414 GLP/GEP (Y/N): Y Published (Y/N): N	Y	Y	DAS
IIIA 10.4.7/05	Anonymous	2016	Pre-Flowering Applications of Sulfoxaflor: Exposure and Effects on Honey bees Dow AgroSciences DAS Study ID: - GLP/GEP (Y/N): n.a. Published (Y/N): N	Y	Y	DAS

APPENDIX 2: GAP

Appendix 2.1: Table of intended Core uses and GAP for GF-2626

Country	Crop
Bulgaria	Apples, Aubergines, Beans, Brassicas [Broccoli, Cabbage, Cauliflower, Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)] , Bulbs, Ornamentals, Flowers , Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Leaf vegetables and fresh herbs (lettuce and other salad plants, spinach and similar (leaves), others in crop group) , Peach, Nectarine, Pear, Pepper, Pea, Plums, Cherries, Potatoes, Tomatoes
Croatia	Apples, Aubergines, Peach, Nectarine, Pepper, Pears, Plums, Cherries, Tomatoes
Cyprus	Aubergines, Peach, Nectarine, Pepper, Tomatoes
France	Apples, Aubergines, Beans, Brassicas [Broccoli, Cabbage, Cauliflower, Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)] , Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Leaf vegetables and fresh herbs (lettuce and other salad plants, spinach and similar (leaves), others in crop group) , Grapefruits, Lemon, Mandarin, Orange, Peach, Nectarine, Pear, Plums, Cherries, Potatoes, Pepper, Peas, Plums, Cherries, Tomatoes
Greece	Apples, Aubergines, Beans, Brassicas [Broccoli, Cabbage, Cauliflower, Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)] , Bulbs, Ornamentals, Flowers , Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Leaf vegetables and fresh herbs (lettuce and other salad plants, spinach and similar (leaves), others in crop group) , Grapefruits, Lemon, Mandarin, Orange, Peach, Nectarine, Pear, Pea, Pepper, Plums, Cherries, Potatoes, Tomatoes
Italy	Apples, Aubergines, Beans, Brassicas [Broccoli, Cabbage, Cauliflower, Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)] , Bulbs, Ornamentals, Flowers , Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Leaf vegetables and fresh herbs (lettuce and other salad plants, spinach and similar (leaves), others in crop group) , Grapefruits, Lemon, Mandarin, Orange, Peach, Nectarine, Pear, Pea, Plums, Cherries, Potatoes, Pepper, Plums, Cherries, Tomatoes
Malta	Tomatoes, Pepper, Aubergines
Portugal	Apples, Aubergines, Beans, Bulbs, Ornamentals, Flowers, Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Grapefruits, Lemon, Mandarin, Orange, Peach, Nectarine, Pear, Potatoes, Pepper, Peas, Plums, Cherries, Tomatoes
Spain	Apples, Aubergines, Beans, Brassicas [Broccoli, Cabbage, Cauliflower, Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)] , Bulbs, Ornamentals, Flowers , Cucurbits (Cucumber, Water Melon, Zucchini, Melon, Pumpkin, Squash), Leaf vegetables and fresh herbs (lettuce and other salad plants, spinach and similar (leaves), others in crop group) , Grapefruits, Lemon, Mandarin, Orange, Peach, Nectarine, Pear, Peas, Plums, Cherries, Potatoes, Pepper, Tomatoes

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests	Formulation	Application	Application rate per treatment	PHI days (k)	Remarks (l)
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				controlled (c)	Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Num ber min max	Interval between applications (min)	kg as/hl min max	Water (l/ha) min max	kg as./ha min max		
Apples	South (FR, IT, PT, ES, BG, EL, HR)	GF- 2626	F	Aphids, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 51-59 (pre- flowering) Feb - BBCH 69-85 Mar-Sep	1-2	7	0.0016-0.016	300-1500	0.024- 0.048	7	Two applications of 24 g/ha rate would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible either pre or post flowering. No spray is allowed during the flowering.
Aubergines	South (FR, BG, EL, HR, CY, MA, IT, ES, PT)	GF- 2626	F	Aphids, Whiteflies	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20-87 Apr-Nov	1-2	7	0.0016- 0.0096	500 - 1500	0.024- 0.048 (see Remarks)	1	<u>Aphids</u> : One or two applications of 0.024 g a.s./ha. Two applications would be minimum 7 days interval. <u>Whiteflies</u> : Either two applications of 0.024 kkg a.s./ha with a minimum 7 days interval or only one application of 0.048 kg a.s./ha.
Beans (fresh, without pods), beans (fresh, with pods)	South (FR, ES, PT, BG, EL, IT)	GF- 2626	F	Aphids	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 40-85 Apr-Jul	1-2	21	0.004-0.016	150 - 1000	0.024	14	Two applications would be minimum 21 days interval
Brassicas [Broccoli, Cabbage, Cauliflower,	South (IT, ES, BG, EL, FR)	GF- 2626	F	Aphids	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20-49 Apr-Sep	1		0.004-0.012	200 - 1000	0.024	7	

Applicant (Dow)

Evaluator France
Date October 2017

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/ha min max	Water (l/ha) min max	kg as./ha min max		
Brussels sprouts, Leafy brassicas (Chinese cabbage, Kale, others)]															
Bulbs, Ornamentals, Flowers	South (IT, BG, EL, ES, PT)	GF-2626	F	Aphids, Whiteflies	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 12-59 All year	1-2	7	0.0012-0.024	200 - 2000	0.024-0.048 (see Remarks)	1	<u>Aphids</u> : One or two applications of 0.024 kg a.s./ha. Two applications would be minimum 7 days interval. <u>Whiteflies</u> : Either two applications of 0.024 kkg a.s./ha with a minimum 7 days interval or only one application of 0.048 kg a.s./ha.
Cucurbits (edible peel – cucumbers, courgettes, gherkins; inedible peel – melons, pumpkins/ squash, watermelons, zucchini)	South (FR, IT, ES, PT, BG, EL)	GF-2626	F	Aphids, Whiteflies	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20-87 Apr-Nov	1-2	7	0.0016-0.0096	500 - 1500	0.024-0.048 (see Remarks)	1	<u>Aphids</u> : One or two applications of 0.024 kg a.s./ha. Two applications would be minimum 7 days interval. <u>Whiteflies</u> : Either two applications of 0.024 kkg a.s./ha with a minimum 7 days interval or only one application of 0.048 kg a.s./ha.

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/ha min max	Water (l/ha) min max	kg as./ha min max		
Grapefruit	South (ES, IT, PT, FR, EL)	GF-2626	F	Aphids, Mealybugs, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 30-85 Mar-Oct	1-2	7	0.00096- 0.0096	500 - 2500	0.024 - 0.048 (see Remarks)	7	Two applications of 0.024 kg a.s./ha would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible in a year.
Leaf vegetables (Lettuce and other salad plants including Brassicacea, spinach and similar (leaves), herbs)	South (ES, IT, FR, BG, EL)	GF-2626	F	Aphids	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20-49 Apr-Sep	1		0.004-0.012	200-1000	0.024	7	
Lemons	South (ES, IT, FR, PT, EL)	GF-2626	F	Aphids, Mealybugs, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 30-85 Mar-Oct	1-2	7	0.00096- 0.0096	500 - 2500	0.024 - 0.048 (see Remarks)	7	Two applications of 0.024 kg a.s./ha would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible in a year.

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/hl min max	Water (l/ha) min max	kg as./ha min max		
Mandarins	South (ES, IT, FR, PT, EL)	GF-2626	F	Aphids, Mealybugs, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 30-85 Mar-Oct	1-2	7	0.00096-0.0096	500 - 2500	0.024 -0.048 (see Remarks)	7	Two applications of 0.024 kg a.s./ha would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible in a year.
Oranges	South (ES, IT, FR, PT, EL)	GF-2626	F	Aphids, Mealybugs, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 30-85 Mar-Oct	1-2	7	0.00096-0.0096	500 - 2500	0.024 -0.048 (see Remarks)	7	Two applications of 0.024 kg a.s./ha would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible in a year.
Peaches and Nectarines	South (ES, IT, FR, PT, GR, CY, BG, EL, HR)	GF-2626	F	Aphids, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 51-59 (pre-flowering) Feb BBCH 69-85 Mar-Sep	1-2	7	0.0016-0.016	300-1500	0.024-0.048 (see Remarks)	7	Two applications of 24 g/ha rate would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible either pre or post flowering. No spray is allowed during the flowering.

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/ha min max	Water (l/ha) min max	kg as./ha min max		
Pears	South (ES, IT, FR, PT, BG, EL, HR)	GF-2626	F	Aphids, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 51-59 (pre-flowering) Feb BBCH 69-85 Mar-Sep	1-2	7	0.0016-0.016	300-1500	0.024-0.048 (see Remarks)	7	Two applications of 24 g/ha rate would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible either pre or post flowering. No spray is allowed during the flowering.
Peas (fresh without pods), peas (fresh with pods)	South (BG, EL, IT, ES, PT, FR)	GF-2626	F	Aphids	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 40-85 Apr-Jul	1-2	21	0.004-0.016	150 - 1000	0.024	14	Two applications would be minimum 21 days interval
Pepper	South (BG, EL, CY, MA, IT, ES, PT, FR, HR)	GF-2626	F	Aphids, Whiteflies	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20-87 Apr-Nov	1-2	7	0.0016-0.0096	500 - 1500	0.024-0.048 (see Remarks)	1	<u>Aphids</u> : One or two applications of 0.024 g a.s./ha. Two applications would be minimum 7 days interval. <u>Whiteflies</u> : Either two

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/ha min max	Water (l/ha) min max	kg as./ha min max		
															applications of 0.024 kg a.s./ha with a minimum 7 days interval or only one application of 0.048 g a.s./ha.
Plums and Cherries	South (PT, ES, BG, EL, FR, HR, IT)	GF-2626	F	Aphids, Scales	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 51-59 (pre-flowering) Feb BBCH 69-85 Mar-Sep	1-2	7	0.0016-0.016	300-1500	0.024-0.048 (see Remarks)	7	Two applications of 24 g/ha rate would be minimum 7 days interval. If higher rate than 24 g/ha is applied, only one application is possible either pre or post flowering. No spray is allowed during the flowering.
Potatoes	South (BG, EL, IT, ES, PT, FR)	GF-2626	F	Aphids	SC	120 g/L	Ground applied foliar spray, broadcast	BBCH 20 - 95 May-Aug	1-2	21	0.004-0.012	200 - 600	0.024	7	Two applications would be minimum 21 days interval.
Tomatoes	South (FR, BG,	GF-	F	Aphids,	SC	120 g/L	Ground applied	BBCH 20-87	1-2	7	0.00160.0096	500 -	0.024-0.048	1	<u>Aphids</u> : One or two applications of 0.024 g

Crop and/or situation (a)	Member State or Country	Product Name	F or G (b)	Pests or Group of pests controlled (c)	Formulation		Application				Application rate per treatment			PHI days (k)	Remarks (l)
					Type (d-f)	Conc. of a.s. (i) g/L	Method Kind (f-h)	Growth stage (j)	Number min max	Interval between applications (min)	kg as/hl min max	Water (l/ha) min max	kg as/ha min max		
	EL, HR, MA, CY, IT, ES, PT)	2626		Whiteflies			foliar spray, broadcast	Apr-Nov				1500	(see Remarks)		a.s./ha. Two applications would be minimum 7 days interval. <u>Whiteflies</u> : Either two applications of 0.024 kg a.s./ha with a minimum 7 days interval or only one application of 0.048 g a.s./ha.

- (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 plant - 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) Indicate the minimum and maximum number of application possible under practical conditions of use
 (l) PHI - minimum pre-harvest interval
 (m) Remarks may include: Extent of use/economic importance/restrictions