

REGISTRATION REPORT

Part A

Risk Management

**Product code: Copper Oxychloride 25% + Cymoxanil
4% WG**

Product name: CURAME 25WG

Active substances:

cymoxanil, 40 g/kg

copper (in the form of copper oxychloride), 250 g/kg

COUNTRY: FRANCE

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(new application)

Applicant: MANICA S.P.A.

Date: 2019-03-27

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PART A – Risk Management

The company MANICA S.P.A. has requested marketing authorisation in France for the product CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG), containing 40 g/kg cymoxanil and 250 g/kg copper (in the form of copper oxychloride), for use as a fungicide.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-7 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in Registration Report, Part B include assessment of further data or information as required at national registration by the EU peer review. It also includes assessment of data and information relating to CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) have been made using endpoints agreed in the EU peer reviews of both cymoxanil and copper (in the form of copper oxychloride).

This document describes the specific conditions of use and labelling required for France for the registration of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG).

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

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

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

1 DETAILS OF THE APPLICATION

1.1 Application background

The present registration report concerns the evaluation of MANICA S.P.A.'s application to market CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) in France as a fungicide (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the first authorisation of this product (following the renewal of authorisation after approval of copper oxychloride) of this product in France and in other MSs of the Southern zone.

1.2 Active substance approval

Cymoxanil

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

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

PART A

Only uses as fungicide may be authorised.

PART B

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on cymoxanil, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 28 October 2008 shall be taken into account.

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

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

— the protection of aquatic organisms and must ensure that the conditions of authorisation include risk mitigation measures such as buffer zones, where appropriate.

Commission Implementing Regulation (EU) 2017/195 of 3 February 2017 amending Implementing Regulation (EU) No 540/2011 as regards the extension of the approval periods of several active substances listed in Part B of the Annex to Implementing Regulation (EU) No 686/2012 (AIR IV renewal programme) extended the approval's expiration date to 31 August 2021.

An EFSA conclusion is available (EFSA Scientific Report (2008) 167, 1-116).

A Review Report is available (final SANCO/179/08 rev 1, 9 July 2010).

Copper compounds

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

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

PART A

Only uses as bactericide and fungicide may be authorised.

PART B

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

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

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

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

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

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

Commission Implementing Regulation (EU) 2018/84 of 19 January 2018 extended the approval's expiration date to

31 January 2019

.

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

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

A Review Report is available (SANCO/150/08 final, 26 May 2009, modified 10 October 2014) and a list of studies relied on (2018).

1.3 Regulatory approach

The present application (2014-3567) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses) in the context of the zonal procedure for all Member States of the Southern zone, taking into account the worst-case uses (“risk envelope approach”)¹ – the highest application rates over the Southern zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

The French Order of 4 May 2017² provides that:

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

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

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

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

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

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

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

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

² Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjoints visés à l'article L. 253-1 du code rural et de la pêche maritime <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGR1632554A/jo/texte>

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

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

⁵ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGR1407093A/jo>

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

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

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

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

1.5 Letter(s) of Access

The applicant has provided letter(s) of access for active substance data.

2 DETAILS OF THE AUTHORISATION

2.1 Product identity

| | |
|--------------------------------|--|
| Product name (code) | CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) |
| Authorisation number | 2180894 |
| Function | Fungicide |
| Applicant | MANICA S.P.A. |
| Composition | 40 g/kg cymoxanil 250 g/kg copper (in the form of copper oxychloride) |
| Formulation type (code) | Water-dispersible granule (WG) |
| Packaging | HDPE bottle containing 500 g product. Multilayer PET/aluminium/LDPE bag containing 1 kg product. Kraft paper bags or sacks containing 5 kg, 10 kg, 20 kg or 25 kg product. |

2.2 Classification and labelling

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

| | |
|------------------------------|--|
| Physical hazards | - |
| Health hazards | Acute toxicity, Inhalation, category 4. Serious eye damage/eye irritation, category 1. Reproductive toxicity, category 2. |
| Environmental hazards | Hazardous to the aquatic environment, Acute Hazard, Category 1. Hazardous to the aquatic environment, Chronic Hazard, Category 1. |

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

| | | | |
|--|--|--|--|
| Hazard pictograms | | | |
| Signal word | Danger | | |
| | H318 | Causes serious eye damage. | |
| Hazard statements | H332 | Harmful if inhaled. | |
| | H361fd | Suspected of damaging fertility. Suspected of damaging the unborn child. | |
| | H400 | Very toxic to aquatic life. | |
| | H410 | Very toxic to aquatic life with long-lasting effects. | |
| Precautionary statements – | <p><i>For the P phrases, refer to the extant legislation</i></p> | | |
| Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008) | EUH208 | Contains cymoxanil. May produce an allergic reaction. | |

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

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

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

| | |
|-------|--|
| SP 1 | Do not contaminate water with the product or its container. Do not clean application equipment near surface water. Avoid contamination via drains from farmyards and roads. |
| SPe 1 | To protect soil organisms, do not apply this product or any other product containing copper at an annual dose higher than 4 kg Cu/ha. |
| SPe 3 | To protect aquatic organisms, respect an unsprayed buffer zone of 50 metres ⁷ with a planted buffer strip of 20 metres to surface water bodies, for the use in vineyards |
| SPe 3 | To protect aquatic organisms, respect an unsprayed planted buffer zone of 20 metres ⁷ with a planted buffer strip of 20 metres to surface water bodies for the uses on tomato and melon |
| SPe 8 | To protect bees and pollinating insects, do not apply to crop plants during . |
| SPa 1 | To avoid the development of resistance of <i>Plasmopara viticola</i> to cymoxanil, the number of applications must be limited to two applications per crop cycle on grapevine. To manage the risk of resistance with the active substances belonging to the same mode of action (cyanoxamides), it is recommended to follow the limitations of use by chemical group recommended by the French official advice on resistance management of grapevine diseases. |

2.2.3 Other phrases linked to the preparation

Wear suitable personal protective equipment⁸: refer to the Decision in Appendix 1 for the details.

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

⁸ If a tractor with cab is used, wearing gloves during application is only required when working with the spray mixture

Re-entry period⁹: 48 hours

Pre-harvest interval¹⁰: grape: 20 days; tomato, melon and cucumber: 10 days.

Other mitigation measures: -

The label must include the following recommendations:

- The following phrase must appear: “EUH208: Contains cymoxanil. May produce an allergic reaction.”

The label must reflect the conditions of authorisation.

⁹ The legal basis for this is **Titre I Article 3** of the French Order of 4 May 2017 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]

¹⁰ According to the French Order of 4 May 2017, PHI cannot be lower than 3 days unless specifically stated in the assessment and decision.

2.3 Product uses

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

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

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

| | | | | | | | |
|-------------------------|---|--|--|--|----------------------|-------------------------------------|--|
| PPP (product name/code) | CURAME 25 WG/(Copper Oxychloride 25% + Cymoxanil 4% WG) | | | | GAP rev. | , date: 2019-03-27 | |
| active substance 1 | cymoxanil | | | | Formulation type: | | |
| active substance 2 | copper (in the form of copper oxychloride) | | | | Conc. of a.s. 1: | WG 40 g/kg | |
| Applicant: | MANICA S.P.A. | | | | Conc. of a.s. 2: | 250 g/kg | |
| Zone(s): | southern EU | | | | professional use | <input checked="" type="checkbox"/> | |
| Verified by MS: | yes | | | | non-professional use | <input type="checkbox"/> | |

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

| | | | | | | | | | | | | | | | |
|-------------------------|---|--|---|----------------------------|----|-------------------------|-------------------|--|---|---|--|----------|----------------------------------|----|------------|
| Grapes (wine and table) | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | <i>Plasmopara viticola</i> | WG | Copper 25% Cymoxanil 4% | Air blast sprayer | Post-flowering to harvest BBCH 66 to 85) | 2 | 8 | Copper 0.063-0.075 Cymoxanil 0.009-0.0120 (based on 1000 L water/ha) | 300-1000 | Copper 620-750 Cymox. 100-120 | 20 | Acceptable |
|-------------------------|---|--|---|----------------------------|----|-------------------------|-------------------|--|---|---|--|----------|----------------------------------|----|------------|

| | | | | | | | | | | | | | | | |
|--|---|--|-----|--|----|-------------------------|--------------------|------------|-----|------|--|---------|---------------------------------|----|---|
| Tomato (industrial and fresh) | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F/G | <i>Phytophthora infestans</i> , Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | All stages | 1-6 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Non acceptable (aquatic organisms) |
| Tomato (industrial and fresh) and eggplant | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F/G | <i>Phytophthora infestans</i> , Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 15-89 | 5 | 8 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Acceptable |
| Tomato (industrial and fresh) | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F/G | Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | All stages | 5 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (efficacy) |
| Potato | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F/G | <i>P. infestans</i> , bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | All stages | 5 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (MRL exceedence) |

| | | | | | | | | | | | | | | | |
|---|---|--|---|--|----|-------------------------|--------------------|------------|---|------|--|---------|------------------------------|----|---------------------------|
| Melon, water melon, pumpkin, and other cucurbits with inedible peel | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | <i>Pseudoperonospora cubensis</i> , bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 15-89 | 5 | 8 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Acceptable |
| Melon | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 15-89 | 5 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (efficacy) |
| Cucumber, zucchini, gherkins and other cucurbits with edible peel | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | <i>P. cubensis</i> , bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 15-89 | 4 | 8 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Acceptable |
| Cucumber | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 15-89 | 4 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (efficacy) |

| | | | | | | | | | | | | | | | |
|---------|---|--|---|-----------------------------------|----|-------------------------|--------------------|------------|-----|------|--|---------|---------------------------------|----|--|
| Lettuce | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | <i>Bremia lactucae</i> | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 13-49 | 1-6 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (MRL exceedence) |
| Lettuce | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | Bacterial diseases | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 13-49 | 1-6 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (MRL exceedence; efficacy) |
| Lettuce | S | 25% Copper Oxychloride + 4% Cymoxanil WG | F | <i>Microdochium panattonianum</i> | WG | Copper 25% Cymoxanil 4% | Field crop sprayer | BBCH 13-49 | 1-6 | 8-10 | Copper 0.078-0.093 Cymoxanil 0.012-0.015 (based on 800 L water/ha) | 600-800 | Copper 560-750 Cymox. 90-120 | 10 | Not acceptable (MRL exceedence; efficacy) |

N/A : Not applicable

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

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

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

3 RISK MANAGEMENT

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

3.1.1 Physical and chemical properties

Commercial packaging:

Bottles of 500 g capacity in PE.

Bags of 1 kg capacity in PET+Al+PE.

Bags of 5, 10, 20 and 25 kg capacity in kraft paper.

CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) is a water-dispersible granules formulation. All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is that of a green granulated solid, with mild odour. It has no oxidising properties, is not flammable and has a self-ignition temperature of 193.3 °C. In 1 % w/v aqueous solution, it has a pH value of 5.8 at 24.1 °C. There is no effect of high temperature on the stability of the formulation, since after 14 days at 54 °C, neither the active substances' content nor the technical properties were changed. The stability data indicate a shelf life of at least two years at ambient temperature when stored in multi-layer bag (with inner PE). Its technical characteristics are acceptable for a water-dispersible granule formulation.

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

Data required post authorisation:

Physical and chemical properties

- A validated method for the determination of relevant impurities (lead, cadmium, arsenic) in the product.
- Persistence of foaming and attrition resistance must be determined after storage for two years at ambient temperature.
- The product has an attrition resistance of < 98 % so the particle size of dust must be determined and information to explain the difference between the two tests is required.
- The persistence of foaming must be also performed at the maximum application rate (1.0 % w/v); if the volume is above 60 mL, evidence must be submitted showing there is no unacceptable risk to operators following use of the preparation through the appropriate application equipment.
- The suspensibility test must be performed at the maximum application rate (1 % w/v).

3.1.2.1 Analytical method for the formulation

Copper:

Analytical methods for the determination of the active substance copper oxychloride are available and validated.

No analytical method for the determination of its relevant impurities (lead, arsenic, cadmium) have been submitted: these are required.

Cymoxanil: -

3.1.2.2 Analytical methods for residues

Copper:

Analytical methods are available in the Draft Assessment Report (DAR) and in the dossier and validated for the determination of residues of copper in plants, water and soil.

Cymoxanil:

Analytical methods are available in the DAR and validated for the determination of residues of cymoxanil in plants (high-water-content commodities), soil, water (surface and drinking) and air.

3.1.2 Mammalian Toxicology

Endpoints used in risk assessment

| Active substance: copper oxychloride | | | |
|---|---|------------------------------|--|
| ADI | 0.15 mg kg bw/d | EU (2009) | |
| ARfD | Not applicable | | |
| AOEL | 0.072 mg/kg bw/d | | |
| Dermal absorption | Based on an <i>in vitro</i> human study performed on several formulations containing copper in different forms *: | | |
| | Concentrate (tested) | Diluted formulation (tested) | |
| Dermal absorption endpoints % | 1 | 9 | |

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

| Active substance: cymoxanil | | | |
|--------------------------------------|---|---|--|
| ADI | 0.013 mg kg bw/d | EU (2009) | |
| ARfD | 0.08 mg/kg bw | | |
| AOEL | 0.01 mg/kg bw/d | | |
| Dermal absorption | Based on an <i>in vitro</i> human study performed on a similar formulation (<i>pro rata</i> correction)* : | | |
| | Concentrate (tested) 450 g/kg (tested dose) | Diluted formulation (tested) 0.56 g/L (tested dose) | |
| <i>In vitro</i> (human) % | 0.06 | 2.6 | |
| | Concentrate (in formulation) 40 g/kg | Spray dilution (used in formulation) 0.12 g/L (in-use dilution (grapes)) | |
| Dermal absorption endpoints % | 2.6 | 12 | |

* Note: the applicant submitted a triple-pack approach based on dermal absorption studies performed on Cymoxanil 45 WG (= CYMBAL 45). The preparation CYMBAL 45 has been considered as a worst case in term of dermal absorption compared with CURAME 25 WG. Indeed, CYMBAL 45 WG is classified as a skin sensitisier (CURAME 25 WG is not classified for this end point), and contains a higher content in surfactants than CURAME 25 WG.

To derive the dermal absorption values, only the *in vitro* dermal absorption study performed on human skin was taken into account. The evaluation of this study by the zRMS gives the following results: 0.1 % for the concentrate

and 2.6 % for the dilution (0.56 g/L). The dermal absorption values proposed for CURAME 25 WG take into account the concentration of cymoxanil in the preparation (40 g a.s./kg) and the worst-case dilution requested in the field (1000 L/ha for grapes). A *pro rata* correction has been made for the dilution and the dermal absorption from the tested dilution (0.56 g/L) have been applied for the product (40 g/kg).

3.1.3.1 Acute Toxicity

CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG), containing 40 g/kg cymoxanil and 250 g/kg copper oxychloride, has a low acute oral and dermal toxicity, is not a skin sensitisier, is not irritating to the rabbit skin but is harmful if inhaled and is irritating to the rabbit eye.

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

3.1.3.2 Operator Exposure

Summary of critical use patterns (worst cases):

| Crop | F/G ¹¹ | Equipment | Application rate kg product/ha (g a.s./ha) | Spray dilution (L/ha) | Model |
|---|-------------------|---|---|-----------------------------|-------|
| Grapes | F | Tractor-mounted/trailed broadcast air-assisted sprayer | 3 kg CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG)/ha: (copper: 750 cymoxanil: 120) | 300-1000 | BBA |
| | F | Hand-held knapsack (high level) | | | BBA |
| Tomato (industrial ¹² and fresh) / potato / melon / cucumber / lettuce | F | Tractor-mounted/trailed boom sprayer, hydraulic nozzles | 600-800 | 600-800 | BBA |
| Tomato (industrial and fresh) | G | Hand-held sprayer | | | BBA |

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

| Crop | Equipment | PPE and/or working coverall | % AOEL copper | % AOEL cymoxanil |
|--------|---|---|------------------|---------------------|
| Grapes | Tractor-mounted broadcast air-assisted sprayer application outdoors to high crops | Working coverall and gloves during mixing/loading and application | 27 | 41 |

¹¹ Open field or glasshouse

¹² That is, for canning/processing

| Crop | Equipment | PPE and/or working coverall | % AOEL copper | % AOEL cymoxanil |
|---|--|-----------------------------|------------------|---------------------|
| Grapes | Hand-held knapsack to high crops | | 16 | 23 |
| Tomato (industrial and fresh) / potato / melon / cucumber / lettuce | Tractor mounted boom spray application outdoors to low crops | | 9.9 | 15 |
| Tomato (industrial and fresh) | Hand held sprayer | | 16 | 23 |

According to the model calculations, it may be concluded that the risk for the operator using CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) is acceptable with a working coverall (90 % protection factor) and gloves during mixing/loading and application.

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

3.1.3.3 Bystander Exposure

Bystander exposure was assessed according to EUROPOEM II. Exposure is summarised in the table below:

| Active substance | % AOEL | |
|---|--------|-----------|
| Uses/crops | copper | cymoxanil |
| Arable crops (potato) and vegetables < 50 cm (melon, lettuce) | 0.7% | 1.1% |
| Vegetables > 50 cm (tomato, cucumber) | 3.4% | 5.2% |
| Grapes | 6.0% | 9.0% |

It may be concluded that there is no unacceptable risk to the bystander after incidental short-term exposure to CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG).

3.1.3.4 Worker Exposure

Workers may have to enter treated areas after treatment for crop inspection/harvesting (worst case) activities. Therefore, estimation of worker exposure was calculated according to EUROPOEM II. Exposure is presented below:

| Uses/crops | Level of PPE | % AOEL copper | % AOEL cymoxanil |
|--------------------|--------------|------------------|---------------------|
| Potatoes | with PPE | 4.7 | 7.2 |
| Vegetables < 50 cm | | 19 | 29 |
| Vegetables > 50 cm | | 38 | 58 |
| Grape | | 56 | 86 |

It may be concluded that without taking into account a re-entry period, there is no unacceptable risk anticipated for workers wearing a working coverall and gloves, when re-entering crops treated with CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG).

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

3.1.3.5 Resident Exposure

Residential exposure was assessed according to Martin *et al* approach. Exposure is summarised in the table below:

| Uses/crops | % AOEL copper | | % AOEL cymoxanil | |
|--|---------------|------------|------------------|------------|
| | Adult | Child | Adult | Child |
| Field crops, tractor-mounted (FCTM): potato | 0.5 | 1.1 | 3.6 | 6.9 |
| High crops, tractor-mounted (HCTM): Vegetables and ornamentals < 50 cm: melon, lettuce | | | | |
| High crops, tractor-mounted (HCTM): Vegetables, ornamentals, berry fruits (> 50 cm): cucumber, tomato | 1.7 | 3.4 | 5.3 | 11 |
| High crops, tractor-mounted (HCTM) and hand-held (HCHH): grapes | | | | |

It may be concluded that there is no unacceptable risk to the resident exposed to CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG).

Based on the currently available data (2001-2006) in the report of the ORP (French pesticides residues observatory), the respiratory exposure of people living near sprayed areas was estimated:

CYMOXANIL

| | | % ADI | % AOEL |
|---|-------|-------|--------|
| Maximum daily measurement (3.22 ng/m ³) | Adult | 0.01 | 0.013 |
| | Child | 0.014 | 0.018 |
| Maximum weekly measurement (0.41 ng/m ³) | Adult | 0.001 | 0.002 |

3.1.4 Residues and Consumer Exposure

3.1.4.1 Residues

Table 1: Summary for cymoxanil

| Use- No.* | Crop | Plant metabolism covered? | Sufficient residue trials? | PHI sufficiently supported? | Sample storage covered by stability data? | MRL compliance SANTE/12049/20 17 | Chronic risk for consumers identified? | Acute risk for consumers identified? | Comments |
|--------------|----------------|------------------------------|---------------------------------|--------------------------------|---|--|--|--|---|
| 1 | Grape | Yes | Yes (4 NEU + 4 SEU) | Yes | Yes | Yes | No | No | |
| 2 | Tomato | Yes | Yes (4 SEU) | Yes | Yes | Yes | | No | |
| 3 | Potato | Yes | Yes (4 NEU + 15 SEU) | Yes | Yes | No | | - | |
| 4 | Melon | Yes | Yes (7 SEU) | Yes | Yes | Yes | | No | |
| 5 | Cucumber | Yes | Yes (4 indoor [I]) | Yes | Yes | Yes | | No | Additional outdoor trials are required post- authorisation |
| 6 | Lettuce | Yes | No (4 SEU + 0 NEU) | - | - | - | | - | |

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

For cucumber, additional data are required post-authorisation to confirm that a “no-residue” situation occurs in outdoor conditions.

As residues of cymoxanil do not exceed the trigger values defined in Reg. (EU) No 283/2013, there is no need to investigate the effect of industrial and/or household processing.

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

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

Summary for copper

| Use- No.* | Crop | Plant metabolism covered? | Sufficient residue trials? | PHI sufficiently supported? | Sample storage covered by stability data? | MRL compliance Reg. (EC) No 149/2008 | Chronic risk for consumers identified? | Acute risk for consumers identified? | Comments |
|--------------|----------|------------------------------|-------------------------------|--------------------------------|---|--|--|--|---|
| 1 | Grape | Yes | Y (13 SEU + 13 NEU) | Yes | Yes | Yes | No | n.a. | |
| 2 | Tomato | Yes | Yes | Yes | Yes | Yes | | n.a. | |
| 3 | Potato | Yes | Y (9 SEU + 9 NEU) | Yes | Yes | No | | n.a. | NEU trials lead to MRL exceedence |
| 4 | Melon | Yes | Y (8 SEU) | Yes | Yes | Yes | | n.a. | |
| 5 | Cucumber | Yes | Y (8 SEU + 4 NEU) | Yes | Yes | Yes | | n.a. | Residue trials only support four applications instead of six |
| 6 | Lettuce | Yes | Y (6 SEU + 8 I) | Yes | Yes | Yes | | n.a. | Residue trials only support four applications instead of six |

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

The effects of processing on the nature of copper residues have been investigated. Data on effects of processing on the amount of residue have been submitted. These data were considered for risk assessment.

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

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

Summary for CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG)

Table 3.1-1: Information on CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG)

| Crop | PHI for CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) requested by applicant | PHI/withholding period* sufficiently supported for | | PHI for CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) proposed by zRMS | zRMS Comments (if different PHI proposed) |
|------|---|--|--------|---|---|
| | | cymoxanil | copper | | |
| 1 | Grape | Yes | Yes | 20 | |
| 2 | Tomato | Yes | Yes | 10 | |
| 4 | Melon | Yes | Yes | 10 | |
| 5 | Cucumber | Yes | Yes | 10 | Additional outdoor trials are required post-authorisation |

NR: not relevant

* Purpose of withholding period to be specified

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

Waiting periods before planting succeeding crops: not relevant.

3.1.4.2 Consumer exposure

The data available are considered sufficient for risk assessment. Any exceedence of the current MRL for copper as laid down in Reg. (EU) 396/2005 is not expected on grape, tomato and melon.

For cucumber and lettuce, a fall-back GAP has been proposed since no residue trial was available to support the requested use. Based on this proposed GAP, an exceedence of the current MRL for copper is not expected.

For potato use, an exceedence of the current MRL for copper is not expected for the southern zone. Nevertheless, the use is not supported in France since distribution of data show that an exceedence of the extant MRL can be expected.

An exceedence of the current MRL for cymoxanil as laid down in Reg. (EU) 396/2005 is not expected on grape, tomato, potato, melon and cucumber. For lettuce, the MRL compliance cannot be checked since no NEU trial is available.

The chronic intake of copper residues is unlikely to present a public health concern.

The chronic and the short-term intakes of cymoxanil residues are unlikely to present a public health concern. As far as consumer health protection is concerned, France as zRMS agrees with the authorisation of the proposed uses.

Data gaps: none.

Data required post-authorisation

Cymoxanil: additional outdoor trials are required on cucumber to confirm a “no-residue” situation.

3.1.5 Environmental fate and behaviour

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

Copper:

The PEC value for copper in soil and surface water has been assessed using the endpoints established in the EU review or agreed in the assessment based on new data provided. PECsoil and PECsw values derived for this active substance are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

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

Cymoxanil:

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

PECsoil and PECsw values derived for this active substance and its metabolites are used for the ecotoxicological risk assessment.

For the intended uses on grapes, melons, cucumbers and tomatoes, PECgw values for cymoxanil and its metabolites do not occur at levels exceeding those mentioned in Regulation (EC) No 1107/2009 and guidance document SANCO 221/2000 on the relevance of metabolites in groundwater. Since no reliable PECgw values are available for lettuce uses, the risk assessment cannot be finalised for this use. For the intended use on potatoes, PECgw values provided for cymoxanil and its metabolites only cover applications on acidic soils. The risk assessment of groundwater contamination could not be finalised for applications on potatoes on neutral/alkaline soils ($pH \geq 6.4$) due to missing modelling (including modelling endpoints derived for alkaline/neutral conditions). For acidic soils ($pH < 6.4$), PECgw values for cymoxanil and its metabolites do not occur at levels exceeding those mentioned in Regulation (EC) No 1107/2009 and guidance document SANCO 221/2000.

Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses on grapes, tomatoes. For the intended use on potatoes, no unacceptable risk of groundwater contamination is expected (for applications on acidic soils only, with pH < 6.4).

3.1.6 Ecotoxicology

The risk assessment of the formulation CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) was performed according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review for active substance were used for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

Based on the guidance documents, the risks for birds, mammals, other non-target arthropods and micro-organisms are acceptable for all the requested uses.

For aquatic organisms, mitigation measures are needed to reduce entry via spray drift and runoff. Indeed, for these organisms, the risks are only acceptable when:

A 50 m no-spray buffer zone including a planted buffer strip of 20 m is applied.

A 20 m no-spray buffer zone including a planted buffer strip of 20 m is applied in tomato, potato, melon, cucumber and lettuce.

| Crop | Copper use pattern with the formulation | | | | | Buffer zone (m) | Planted filter strip (m) |
|-------------------------------|---|-----------------|----------|------------|-------------------|-----------------|--------------------------|
| | BBCH | Number of appl. | Interval | Appl. rate | Total annual rate | | |
| | Growth stage | (-) | (d) | (g/ha) | (g/ha) | | |
| Grapes | Post-flowering to harvest BBCH 66-85 | 5 | 8-10 | 750 | 3750 | 50 | 20 |
| Tomato (industrial and fresh) | All stages | 5 | 8-10 | 750 | 3750 | 20 | 20 |
| Potato | All stages | 5 | 8-10 | 750 | 3750 | 20 | 20 |
| Melon | BBCH 15-89 | 5 | 8-10 | 750 | 3750 | 20 | 20 |
| Cucumber | BBCH 10-89 | 5 | 8-10 | 750 | 3750 | 20 | 20 |
| Lettuce | BBCH 13-49 | 5 | 8-10 | 750 | 3750 | 20 | 20 |

For bees, according to new requirements of Reg. No. 284/2013, a chronic toxicity study for adult bees and data on effects on development of bees should have been submitted by the applicant as exposure of bees to the formulation cannot be excluded. Therefore, the risk to bees cannot be completely excluded. **Mitigation measures such as “to protect bees and other pollinating insects, do not apply during flowering”, and/or post registration request should be set at Member State level.**

3.1.7 Efficacy

Considering the data submitted:

The efficacy level of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) is considered satisfactory for all the requested uses on downy mildew. **Given the absence of efficacy data or possible extrapolation and no demonstration of the usefulness of cymoxanil in the association (i.e., co-formulation) with copper against bacterial diseases of tomato, the results of the evaluation for this use are considered to be not acceptable.**

The curative effect of cymoxanil and its usefulness in the association with copper was not fully demonstrated. Monitoring efficacy data are requested to demonstrate the usefulness of cymoxanil in the product on *Plasmopara viticola*.

On potato, tomato, melon, cucumber and lettuce, CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) brings two active substances: copper, efficacious against downy mildews as well as bacterial diseases, plus cymoxanil, efficacious against downy mildew only. Therefore, on potato, tomato, melon, cucumber and lettuce, the use of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) is justified on bacterial diseases only in the case of joint control against downy mildew. **No data were provided for other diseases of potato and lettuce, nor for bacterial diseases of the different requested crops. Consequently the evaluation of the level of efficacy of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) on these uses cannot be finalised.**

The phytotoxicity level of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG) is considered acceptable for all the requested uses.

The risks of negative impact on yield, propagation, succeeding and adjacent crops are considered acceptable. Risks with copper such as spotting of grape berries or on the processing procedure are known. However, these risks of negative impact are considered acceptable.

There is a risk of resistance developing or appearing to copper for bacterial diseases (*Xanthomonas* sp) on vegetable crops: this requires monitoring. There is a risk of resistance developing or appearing to cymoxanil for *Phytophthora infestans* on potato: this too requires monitoring. Considering the resistance situation for *Plasmopara viticola* to cymoxanil, monitoring is no longer necessary. However, to avoid the development of resistance of *P. viticola* to cymoxanil, the number of applications must be limited to two applications per crop cycle on grapevine.

Restrictions:

SPa 1: To avoid the development of resistance of *Plasmopara viticola* to cymoxanil, the number of applications must be limited to two applications per crop cycle on grapevine. To manage the risk of resistance with the active substances belonging to the same mode of action (cyanoxamides), it is recommended to follow the limitations of use by chemical group recommended by the French official advice on resistance management of grapevine diseases¹³.

Resistance monitoring data:

Monitoring of resistance to copper must be put in place for bacterial diseases on vegetables crops (one monitoring for all products based on copper). Monitoring of resistance to cymoxanil must be put in place for *Phytophthora infestans* on potato. Any new information which would change the resistance risk analysis should immediately be provided to Anses (France). In all cases a report on the results of the monitoring put in place must be provided at the time of the renewal of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG)'s authorisation.

¹³ http://www.vigneuin.com/fileadmin/users/ifv/2015_New_Site/Home_page/Fichiers/2018/Note_technique_commun_Vigne_2018.pdf

First set of conditions: A full dose of the product.

Second set of conditions: multi-site partner application of copper sulfate alone, but at the same dose as in the first method, with a long cycle (10-14 days).

Third set of conditions: a cymoxanil partner product applied alone, but at the same dose with CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG).

An analysis of strains in the field to determine the level of resistance in a relevant way in each trial must be carried out.

3.2 Conclusions arising from French assessment

Taking into account the above assessment, an authorisation **can be granted** for uses on grape, melon and cucumber to control downy mildew; and on tomato to control late blight, as proposed in Appendix 1 – Copy of the product Decision.

Taking into account the above assessment, an authorisation **cannot be granted** for use on tomato, potato, melon, cucumber and lettuce against other fungal and bacterial diseases, for reasons relating to efficacy, MRL exceedence, insufficient residues trials and groundwater contamination. A copy of the decision issued can be found in Appendix 1 – Copy of the product Decision.

3.3 Substances of concern for national monitoring

No information stated.

3.3.1 Post-authorisation monitoring

Monitoring of resistance to copper must be put in place for bacterial diseases on vegetables crops (one monitoring for all products based on copper). Any new information which would change the resistance risk analysis should immediately be provided to Anses (France). In all cases a report on the results of the monitoring put in place must be provided at the time of the renewal of CURAME 25WG (Copper Oxychloride 25% + Cymoxanil 4% WG)'s authorisation.

3.3.2 Post-authorisation data requirements

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

- Two open-field residues trials on cucumber to confirm a “no-residue” situation for cymoxanil.

3.3.3 Label amendments

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

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

Appendix 1 – Copy of the French Decision



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

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

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

Vu la demande d'autorisation de mise sur le marché du produit phytopharmaceutique CURAME 25WG

de la société MANICA S.P.A.
enregistrée sous le n°2014-3567

Vu les conclusions de l'évaluation de l'Anses du 19 décembre 2018,

Vu la décision du Directeur général de l'Anses du 28 décembre 2018,

Vu le recours gracieux formé le 22 février 2019 par la société MANICA S.P.A.,

Vu les éléments complémentaires transmis par la direction en charge de l'évaluation des produits réglementés de l'Anses le 7 mars 2019,

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

La présente décision abroge et remplace la décision du 28 décembre 2018 et s'applique sans préjudice des autres dispositions applicables.

Avertissement :

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



Informations générales sur le produit

| | |
|------------------|---|
| Nom du produit | CURAME 25WG |
| Type de produit | Produit de référence |
| Titulaire | MANICA S.P.A. Via all'Adige, 4 (loc, Borgo Sacco) 38068 ROVERETO (Trento) ITALIE |
| Formulation | Granulé dispersable (WG) |
| Contenant | 438,6 g/kg – oxychlorure de cuivre (équivalent à 250 g/kg de cuivre) 40 g/kg – cymoxanil |
| Numéro d'intrant | 9623-2014.01 |
| Numéro d'AMM | 2180894 |
| Fonction | Fongicide |
| Gamme d'usage | Professionnel |

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active qui arrivera à échéance le plus tôt. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 décembre 2019.

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

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

A Maisons-Alfort le,

27 MARS 2019

Françoise WEBER

Directrice générale déléguée

en charge du pôle produits réglementés

Agence nationale de sécurité sanitaire de

l'alimentation, de l'environnement et du travail (ANSES)



ANNEXE I : Modalités d'autorisation du produit

| Vente et distribution | |
|--|------------------------------|
| Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages : | |
| Emballage | Contenance |
| Bouteilles en polyéthylène haute densité | 500 g |
| Sacs en polyéthylène téréphtalate / aluminium / polyéthylène basse densité | 1 kg |
| Sacs en papier kraft | 5 kg ; 10 kg ; 20 kg ; 25 kg |

| Classification du produit | |
|---|---|
| La classification retenue est la suivante : | |
| Catégorie de danger | Mention de danger |
| Lésions oculaires graves et irritation oculaire - Catégorie 1 | H318 : Provoque des lésions oculaires graves |
| Toxicité aiguë par inhalation - Catégorie 4 | H332 : Nocif par inhalation |
| Toxiques pour la reproduction - Catégorie 2 | H361fd : Susceptible de nuire à la fertilité. Susceptible de nuire au fœtus |
| Dangers pour le milieu aquatique - Danger aigu, catégorie 1 | H400 : Très toxique pour les organismes aquatiques |
| Dangers pour le milieu aquatique - Danger chronique, catégorie 1 | H410 : Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme |
| EUH208 : Contient du cymoxanil. Peut produire une réaction allergique | |
| Pour les phrases P se référer à la réglementation en vigueur. | |
| Le titulaire de l'autorisation est responsable de la mise à jour de la fiche de données de sécurité et de la classification du produit en tenant compte de ses éventuelles évolutions. | |



Liste des usages autorisés

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

| Usages | Dose maximale d'emploi | Nombre maximum d'applications | Stade d'application BBCH | Délai avant récolte (jours) | Zone Non Traitée aquatique (mètres) | Zone Non Traitée arthropodes non cibles (mètres) | Zone Non Traitée plantes non cibles (mètres) | Mention abeilles |
|---|------------------------|-------------------------------|---|-----------------------------|-------------------------------------|--|--|------------------|
| 16323204 Concombre* Trr Part.Aer.* Mildiou(s) | 3 kg/ha | 4/an | entre les stades BBCH 15 et BBCH 89 | 10 | (dont DVP 20) | 20 | - | - |
| | | | Intervalle minimum entre les applications : 8 jours Diminution de 6 à 4 du nombre d'applications en raison des essais résidus fournis. | | | | | |
| 16753208 Melon* Trr Part.Aer.* Mildiou(s) | 3 kg/ha | 5/an | entre les stades BBCH 15 et BBCH 89 | 10 | (dont DVP 20) | 20 | - | - |
| | | | Intervalle minimum entre les applications : 8 jours Diminution de 6 à 5 du nombre d'applications en raison d'un risque d'effet inacceptable pour les organismes du sol. | | | | | |
| 16953201 Tomate* Trr Part.Aer.* Mildiou(s) | 3 kg/ha | 5/an | entre les stades BBCH 15 et BBCH 89 | 10 | (dont DVP 20) | 20 | - | - |
| | | | Également autorisé sous abri. Intervalle minimum entre les applications : 8 jours Diminution de 6 à 5 du nombre d'applications en raison d'un risque d'effet inacceptable pour les organismes du sol. | | | | | |
| 12703203 Vigne* Trr Part.Aer.* Mildiou(s) | 3 kg/ha | 2/an | entre les stades BBCH 66 et BBCH 85 | 20 | (dont DVP 20) | 50 | - | - |
| | | | Intervalle minimum entre les applications : 8 jours Diminution de 5 à 2 du nombre d'applications en raison d'un risque de développement de résistances. | | | | | |

DVP : Dispositif Végétalisé Permanent

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Liste des usages refusés

| Usages | Dose d'emploi | Nombre maximum d'applications | Délai avant récolte (jours) |
|--|---------------|-------------------------------|-----------------------------|
| 01116017 Concombre*Trt Part.Aer.* Bactérioses | 3 kg/ha | 6/an | 10 |
| | | | |
| 16613301 Laitue*Trt Part.Aer.* Bactérioses | 3 kg/ha | 6/an | 10 |
| | | | |
| 16603207 Laitue*Trt Part.Aer.* Mildiou(s) | 3 kg/ha | 6/an | 10 |
| | | | |
| 16701203 Laitue*Trt Sem. Plants* Champignons autres que Pythiacees | 3 kg/ha | 6/an | 10 |
| | | | |
| 16753301 Melon*Trt Part.Aer.* Bactérioses | 3 kg/ha | 6/an | 10 |
| | | | |

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Liste des usages refusés

| Usages | Dose d'emploi | Nombre maximum d'applications | Délai avant récolte (jours) |
|---|---------------|-------------------------------|-----------------------------|
| 15653201 Pomme de terre*Trit Part.Aer. *Mildiou(s) | 3 kg/ha | 6/an | 10 |
| Motivation du refus : L'usage est refusé en raison d'un risque de dépassement des limites maximales de résidus de cuivre. | | | |
| 15654201 Pomme de terre*Trit Prod. Réc.* Champignons autres que pythiacées | 3 kg/ha | 6/an | 10 |
| Motivation du refus : L'usage est refusé en raison d'un risque de dépassement des limites maximales de résidus de cuivre, ainsi qu'en raison de l'absence de données d'efficacité. | | | |
| 16953301 Tomate*Trit Part.Aer.* Bactérioses | 3 kg/ha | 6/an | 10 |
| Motivation du refus : L'usage est refusé en raison de l'absence de données d'efficacité. L'usage est également refusé car l'intérêt du cymoxanil contre les bactérioses n'est pas démontré | | | |



Conditions d'emploi du produit

Protection de l'opérateur et du travailleur

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

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

Pour l'opérateur, porter

Dans le cadre d'une application effectuée à l'aide d'une lance (usage sous abri / plein champ)

• pendant le mélange/chargement

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection de catégorie III type 4 ou 3 (selon le niveau de protection recommandé pendant la phase d'application) ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3);

OU

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

• pendant l'application : sans contact intense avec la végétation

Culture basse (< 50 cm)

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant ;
- Bottes de protection certifiées EN 13 832-3 ;

Culture haute (> 50 cm)

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection de catégorie III type 4 avec capuche ;
- Bottes de protection certifiées EN 13 832-3 ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3)

• pendant l'application : contact intense avec la végétation, cultures hautes et basses

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection de catégorie III type 3 avec capuche;
- Bottes de protection certifiées EN 13 832-3 ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3)



• pendant le nettoyage du matériel de pulvérisation

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection de catégorie III type 4 ou 3 (selon le niveau de protection recommandé pendant la phase d'application) ;

OU

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

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

• pendant le mélange/chargement

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

• pendant l'application - Pulvérisation vers le haut

Si application avec tracteur avec cabine

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

Si application avec tracteur sans cabine

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

• pendant le nettoyage du matériel de pulvérisation

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

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

• pendant le mélange/chargement

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

• pendant l'application - Pulvérisation vers le bas

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Si application avec tracteur avec cabine

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

Si application avec tracteur sans cabine

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

• pendant le nettoyage du matériel de pulvérisation

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

Dans le cadre d'une application avec un pulvérisateur à dos (plein champ)

• pendant le mélange/chargement

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection de catégorie III type 4 ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3) ;

• pendant l'application

- Combinaison de protection de catégorie III type 4 avec capuche ;
- Bottes de protection certifiées EN 13 832-3 ;
- Gants en nitrile certifiés EN 374-3 ;
- Lunettes ou écran facial certifié norme EN 166 (CE, sigle 3) ;

• pendant le nettoyage du matériel de pulvérisation

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de protection non tissée de catégorie III type 4.

Pour le travailleur, porter

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

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

- 48 heures

Respect des limites maximales de résidus (LMR)

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



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

Protection de l'eau

- SP 1 : Ne pas polluer l'eau avec le produit ou son emballage. Ne pas nettoyer le matériel d'application près des eaux de surface. Éviter la contamination via les systèmes d'évacuation des eaux à partir des cours de ferme ou des routes.

Protection de la faune

- SPe 1 : Pour protéger les organismes du sol, ne pas appliquer ce produit ou tout autre produit contenant du cuivre à une dose annuelle totale supérieure à 4 kg Cu/ha.
- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 20 mètres en bordure des points d'eau comportant un dispositif végétalisé permanent d'une largeur de 20 mètres pour les usages sur "tomate" "concombre" et "melon".
- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 50 mètres en bordure des points d'eau comportant un dispositif végétalisé permanent d'une largeur de 20 mètres pour les usages sur vigne
- SPe 8 : Pour protéger les abeilles et autres insectes pollinisateurs, ne pas appliquer durant la floraison.

Gestion des résistances

- Spa 1 : Pour éviter le développement de résistances à la substance cymoxanil, le nombre d'applications de ce produit est limité à 2 applications maximum par campagne contre le mildiou de la vigne.
Afin de gérer au mieux les risques de résistance, il est recommandé de suivre les limitations d'emploi par groupe chimique préconisées par la Note technique commune gestion de la résistance – maladies de la vigne.

Exigences complémentaires post-autorisation

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

| Détail de la demande post autorisation | Délai (mois) | Récurrence (mois) |
|--|--------------|-------------------|
| Fournir pour le cymoxanil, 2 essais résidu plein champ sur concombre. | - | - |
| Fournir des essais d'efficacité sur le mildiou de la vigne démontrant l'effet curatif du cymoxanil et déterminer le niveau de résistance au cymoxanil des souches de <i>Plasmopara viticola</i> présentes. | - | - |

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



CONDITIONS D'EMPLOI :

CURAME 25 WG est autorisée sur les cultures et aux doses suivantes.

| Culture | Maladie | Dose |
|----------------|-----------------------------|---------------|
| Laitue | Pourriture du collet | 2,25-3 kg /ha |
| Pomme de terre | Alternariose | 2,25-3 kg /ha |
| Tomate | | 2,25-3 kg /ha |
| Laitue | Bactériose | 2,25-3 kg /ha |
| Concombre | | 2,25-3 kg /ha |
| Melon | | 2,25-3 kg /ha |
| Laitue | | 2,25-3 kg /ha |
| Concombre | | 2,25-3 kg /ha |
| Melon | Mildiou | 2,25-3 kg /ha |
| Vigne | | 2,50-3 kg /ha |
| Pomme de terre | | 2,25-3 kg /ha |
| Tomate | | 2,25-3 kg /ha |

Le **CURAME 25 WG** est un fongicide associant le cuivre au cymoxanil qui a une action de contact et translaminaire qui doit être utilisé de façon préventive. Le nombre de traitements et leur cadence sont liés au développement de la végétation et aux précipitations.

Sur la vigne, 5 applications par saison peuvent être réalisées avec un intervalle de 8-10 jours entre chaque traitement. Le délai avant récolte est de 20 jours.

Sur les tomates, 6 applications par saison peuvent être effectuées avec une cadence de 8-10 jours. Le délai avant récolte est 10 jours pour les tomates industrielles et tomates fraîches

Sur les pommes de terres, 6 applications par saison peuvent être effectuées avec une cadence de 8-10 jours. Le délai avant récolte est 10 jours.

Sur le melon, 6 applications par saison peuvent être effectuées avec une cadence de 8-10 jours. Le délai avant récolte est 10 jours.

Sur le concombre, 6 applications par saison peuvent être effectuées avec une cadence de 8-10 jours. Le délai avant récolte est 10 jours.

Sur la laitue, 6 applications par saison peuvent être effectuées avec une cadence de 8-10 jours. Le délai avant récolte est 10 jours.

Aucune condition météorologique particulière n'a d'incidence sur l'application du **CURAME 25 WG** et il peut être appliqué à tout moment de la journée.

PREPARATION DE LA BOUILLIE :

Verser la quantité requise de **CURAME 25 WG** dans la cuve du pulvérisateur à moitié remplie d'eau, le système d'agitation fonctionnant.

Compléter avec le volume d'eau nécessaire à l'application en maintenant sous agitation.

RECOMMANDATIONS :

Il est recommandé de :

- traiter uniquement par temps calme,
- ne traiter que les cultures saines et non endommagées,
- prendre soin des cultures voisines.

PRECAUTIONS D'EMPLOI :

Stockage

Conserver les produits dans leur emballage d'origine, dans des locaux fermés à clé, hors de portée des enfants.

Conserver à l'écart des aliments et boissons, y compris ceux pour animaux.

Utilisation

Description des EPI :

Le port d'une combinaison de travail (cotte en polyester/coton 65%/35%, densité d'environ 250 g/m²) avec traitement déperlant est recommandé lors des phases de mélange/chargement, d'application, de nettoyage et en cas de réentrée dans la parcelle traitée.

Lors de phase de mélange/chargement : blouse de catégorie III (TYPE PB [3]), gants en nitrile conformes à la norme EN 374-3 (certifiés pour les risques chimiques), Bottes de protections certifiées EN 13832-3

Lors de la phase d'application :

Application avec lance ou pulvérisateur à dos : gants jetables en nitrile conformes à la norme EN 374-3 (certifiés pour les risques chimiques). Bottes de protections certifiées EN 13832-3

Application avec tracteur sans cabine : gants jetables en nitrile conformes à la norme EN 374-3 (certifiés pour les risques chimiques) jetables, y compris pendant les interventions éventuelles sur le matériel pendant la phase de pulvérisation.

Application avec tracteur avec cabine : gants jetables en nitrile conformes à la norme EN 374-3 (certifiés pour les risques chimiques).

Pendant les interventions éventuelles sur le matériel pendant la phase de pulvérisation, les gants ne devant être portés qu'à l'extérieur de la cabine et stockés après utilisation à l'extérieur de la cabine.

Les reliquats de produit (fond de cuve) sont dilués par rinçage en ajoutant dans la cuve du pulvérisateur un volume d'eau au moins égal à 5 fois le volume de ce fond de cuve. L'épandage de ce fond de cuve dilué est réalisé, jusqu'au désamorçage du pulvérisateur, sur la parcelle ou la zone venant de faire l'objet de l'application du produit en s'assurant que la dose totale appliquée au terme des passages successifs ne dépasse pas la dose maximale autorisée pour l'usage considéré.

Après utilisation

Emballage : éliminer les emballages via les collectes organisées par les distributeurs partenaires de la filière ADIVALOR (08 10 12 18 85, numéro Azur prix d'un appel local).

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

Les doses, usages, conditions et précautions d'emploi décrits ont été définis en fonction des caractéristiques du produit et des applications auxquelles il est destiné. Traitez en respectant ces recommandations selon la bonne pratique agricole tout en tenant compte, sous votre responsabilité, des facteurs particuliers liés à votre exploitation, tels que nature du sol, conditions météorologiques, méthodes culturales, variétés végétales, résistance des espèces... Ne pouvant contrôler le stockage, le transport, le mode d'utilisation, les façons culturales, le dosage, etc. et sachant que ces circonstances peuvent influencer l'action du produit et les réactions éventuelles de la culture, nous ne pouvons accepter aucune responsabilité en rapport avec une moindre efficacité ou des dommages qui pourraient résulter de l'application de notre produit. Le fabricant garantit la qualité du produit vendu dans son emballage d'origine ainsi que sa conformité à l'autorisation de vente du Ministère de l'Agriculture.

Appendix 3 – Letter(s) of Access

Provided upon request.