REGISTRATION REPORT

Part A

Risk Management

Product code: Difenoconazole 10.7 + Folpet 360 SC

Product name: DIFOL 360

Chemical active substances:

difenoconazole, 10.7 g/L
folpet, 360 g/L

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(new application)

Applicant: Globachem NV

Date: 28/03/2020

Table of Contents

PART A

RISK MANAGEMENT

1 Details of the application

The company Globachem NV has requested a marketing authorisation in France for the product DIFOL 360 (formulation code: Difenoconazole 10.7 + Folpet 360 SC), containing 10.7 g/L difenoconazole and 360 g/L folpet, as a fungicide for professional uses.

The risk assessment conclusions provided in this document are based on the information, data and assessments provided in the Registration Report, Part B Sections 1-10 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in the Registration Report, Part B include assessment of further data or information as required at national registration by EU regulations. It also includes assessment of data and information related to DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC), where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) have been made using endpoints agreed in the EU peer reviews of difenoconazole and folpet.

This document describes the specific conditions of use and labelling required for France for the registration of DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC).

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

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

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

1.1 Application background

The present registration report concerns the evaluation of Globachem NV's application to market DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) 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 in France and in other MSs of the Southern zone.

The present application (2016-2023) 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 applied for in the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

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

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

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

1.2 Letters of Access

The applicant has provided letters of access for active substance and PPP data.

1.3 Justification for submission of tests and studies

According to the applicant: "*As Difenoconazole 10.7 + Folpet 360 SC is a mixture of two active substances and was not the lead formulation during the Annex I inclusion of Difenoconazole and Folpet, it is not possible to refer to the DAR and the EFSA conclusions on Difenoconazole and Folpet with regard to the formulation studies. Therefore, studies on the plant protection product Difenoconazole 10.7 + Folpet 360 SC had to be generated for authorisation purposes in the Southern zone.*"

1.4 Data protection claims

Where protection for data is *being* claimed for information supporting registration of DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

2 Details of the authorisation decision

2.1 Product identity

Product code	Difenoconazole 10.7 + Folpet 360 SC.
Product name in MS	DIFOL 360.
Authorisation number	N/A : no marketing authorisation granted
Low risk (article 47)	No.
Function	Fungicide.
Applicant	Globachem NV.
Active substance(s) (incl. content)	10.7 g/L difenoconazole + 360 g/L folpet.
Formulation type	Suspension concentrate [code: SC].
Packaging	N/A : no marketing authorisation granted.
Coformulants of concern for national authorisations	None.
Restrictions related to identity	None.
Mandatory tank mixtures	None.
Recommended tank mixtures	None.

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

2.2 Conclusion

The evaluation of the application for DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) resulted in the decision **to refuse** the authorisation.

2.3 Substances of concern for national monitoring

Refer to 5.1.1.

2.4 Classification and labelling

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

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

Hazard class(es), categories:	Acute toxicity (inhalation), category 4. Skin sensitisation, category 1A. Serious eye damage, category 1. Carcinogenicity, category 2. Hazardous to the aquatic environment - Chronic Hazard, category 2. Hazardous to the aquatic environment - Acute Hazard, category 1.
Hazard pictograms:	 GHS05 GHS07 GHS08 GHS09
Signal word:	Danger
Hazard statement(s):	H332 Harmful if inhaled. H317 May cause an allergic skin reaction. H318 Causes serious eye damage. H351 Suspected of causing cancer. H400 Very toxic to aquatic life. H411 Toxic to aquatic life with long-lasting effects.
Precautionary statement(s):	***For the P phrases, refer to the existing legislation***
Additional labelling phrases:	To avoid risks to man and the environment, comply with the instructions for use [EUH401].
	Contains 1,2-benzisothiazol-3(2H)-one.

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

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

N/A : no marketing authorisation granted

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

1107/2009)

None.

2.5 Risk management

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

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

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

Finally, the French Order of 26 March 2014[5] provides that:

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

Thus, at French national level, possible extrapolation of submitted data and the corresponding assessment from “reference” crops to “related” ones are undertaken even if not clearly requested by the applicant in their dRR, and a conclusion is also reached on the acceptability of the intended uses on those “related” crops. The aim of this Order, mainly based on the EU document on residue data extrapolation[6] is to supply “minor” crops with registered plant protection products.

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

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

2.5.1 Restrictions linked to the PPP

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

N/A : no marketing authorisation granted.

2.5.2 Specific restrictions linked to the intended uses

Some of the authorised uses are linked to the following conditions in addition to those listed under point

[4] Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjuvants visés à l'article L. 253-1 du code rural et de la pêche maritime https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte

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

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

2.5.1 (mandatory labelling):

None.

2.6 Intended uses (only NATIONAL GAP)

Please note: The GAP Table below reports the intended uses proposed by the applicant, and possible extrapolation according to French Order of 26 March 2014 (highlighted in green), evaluated and concluded as safe uses by France as zRMS. Those uses are then granted in France.
When the conclusion is "not acceptable" or "not finalised", the intended use is highlighted in grey and the main reason(s) reported in the remarks.
When a use is "acceptable" with GAP restrictions, the modifications of the GAP are in bold.
Use should be crossed out when the applicant no longer supports this use.

9

PPP (product name/code):	DIFOL 360/Difenoconazole 10.7 + Folpet 360 SC	Formulation type:	Suspension concentrate (SC)
Active substance 1:	difenoconazole	Conc. of a.s. 1:	10.7 g/L
Active substance 2:	folpet	Conc. of a.s. 2:	360 g/L
Applicant:	Globachem NV	Professional use:	☒
Zone(s):	Southern	Non-professional use:	☐
Verified by MS:	yes		
Field of use:	fungicide		

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use-No. [e]	**Member state(s)**	**Crop and/ or situation** **(crop destination / purpose of crop)**	**F, Fn, Fpn G, Gn, Gpn or I**	**Pests or Group of pests controlled** (additionally: developmental stages of the pest or pest group)	**Application**				**Application rate**			**PHI** (days)	**Remarks:** e.g. g safener/synergist per ha [f]
					Method / Kind	Timing / Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	L product / ha a) max. rate per appl. b) max. total rate per crop/season	g a.s./ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		

Zonal uses (field or outdoor uses, certain types of protected crops)													
1	FR	Apple	F	Apple scab (*Venturia inaequalis*)	Broadcast air-assisted spraying	When first symptoms occur, up to PHI	a) 3 b) 3	a) 10 days b) 10 days	a) 3.5 L/ha b) 10.5 L/ha	a) 37.5 g difenoconazole/ha + 1260 g folpet/ha b) 113 g difenoconazole/ha + 3780 g folpet/ha	300 - 1000	**120**	Not acceptable (risk for worker,efficacy, bees)
2	FR	Pear	F	Pear scab (*V. pyrina*)	Broadcast air-assisted spraying	When first symptoms occur, up to PHI	a) 3 b) 3	a) 10 days b) 10 days	a) 3.5 L/ha b) 10.5 L/ha	a) 375 g difenoconazole/ha + 1260 g folpet/ha b) 113 g difenoconazole/ha + 3780 g folpet/ha	300 - 1000	**120**	Not acceptable (risk for worker)

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
2 Use official codes/nomenclatures of EU Member States
3 For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure)
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
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.
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.
7 Growth stage at first and last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
8 The maximum number of application possible under practical conditions of use must be provided.
9 Minimum interval (in days) between applications of the same product
10 For specific uses other specifications might be possible, e.g.: g/m³ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
11 The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g, kg or L product / ha).
12 If water volume range depends on application equipments (e.g. ULVA or LVA) it should be mentioned under “application: method/kind”.
13 PHI - minimum pre-harvest interval
14 Remarks may include: Extent of use/economic importance/restrictions

3 Background of authorisation decision and risk management

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

DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) is a suspension concentrate (SC). All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is a uniform creamy white liquid, with a sweet odour. It is not explosive, has no oxidising properties, is not flammable and has no flash point below 100 °C. It has no self-ignition temperature below 400 °C. In 1 % aqueous solution, it has a pH value of 4.84 at 20 °C. There is no effect of low and high temperature on the stability of the formulation, since after seven days at 0 °C and eight weeks at 40 °C, neither the active substances' content nor the technical properties were changed. The stability data indicate a shelf life of at least two years at ambient temperature when stored in HDPE/PA and HDPE/EVOH. As the formulation is an SC, HDPE packaging can be considered acceptable. The technical characteristics are acceptable for an SC formulation.

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

The product must be stored at a temperature below 40 °C.

3.2 Efficacy (Part B, Section 3)

It should be noted that the trials provided were carried out with a product yielding 3 % more difenoconazole and 10 % more folpet per hectare than when DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) is applied.

Considering the data submitted:

- the efficacy level of the product tested is considered satisfactory for all the requested uses. **However, given the absence of data with DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC), the evaluation cannot be finalised**.
- the phytotoxicity level of the tested product, and by extrapolation of DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC), is considered acceptable for all the requested uses.
- the risks of negative impact on yield, quality, propagation and adjacent crops are considered negligible. As regards cider-making, in the absence of specific data, a risk of negative impact cannot be excluded. Users should be warned on the label about this risk.
- the risk of resistance developing or appearing to folpet does not require a monitoring for the requested use. There is a risk of resistance developing or appearing to difenoconazole for *Venturia inaequalis*, which requires monitoring. To avoid the development of resistance of *V. inaequalis* to difenoconazole, the number of applications is limited to three per crop cycle on apple and pear.

Restrictions:
SPa 1: To avoid the development of resistance of *Venturia inaequalis* to difenoconazole, the number of applications is limited to three per crop cycle on apple and pear. To manage the risk of resistance with DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) it is recommended to follow the limitations of use by chemical group in the official advice on resistance management on *V. inaequalis*.

Resistance monitoring data:
Monitoring of resistance to difenoconazole must be put in place on *V. inaequalis* (one monitoring for all products based on difenoconazole). 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 DIFOL 360's (Difenoconazole 10.7 + Folpet 360 SC) authorisation.

3.3 Methods of analysis (Part B, Section 5)

3.3.1 Analytical method for the formulation

Analytical methods for the determination of the active substances and the relevant impurities in the formulation are available and validated.

3.3.2 Analytical methods for residues

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

As the active substances are not toxic/very toxic, an analytical method for their determination in tissues and body fluids is not necessary.

3.4 Mammalian toxicology (Part B, Section 6)

Endpoints used in risk assessment

Active substance: difenoconazole			
ADI	0.01 mg kg bw/d		EU (2009)
ARfD	0.16 mg/kg bw		
AOEL	0.16 mg/kg bw/d		
Dermal absorption	Based on default values according to guidance on dermal absorption (Efsa 2012):		
		Concentrate (used in formulation) 10.7 g/L	Spray dilution (used in formulation) 0.03745 g/L
	Dermal absorption endpoints %	**75**	**75**

Active substance: folpet		
ADI	0.1 mg/kg bw/d	EU (2008)
ARfD	0.2 mg/kg bw	
AOEL	0.1 mg/kg bw/d	
Dermal absorption	Based on an *in vitro* human study performed on a similar formulation according to guidance on dermal absorption (Efsa 2012):	

		Concentrate (tested) 500 g/L	Diluted formulation (tested) 1.5 g/L
	In vitro (human) %		
		Concentrate (used in formulation) 360 g/L	Spray dilution (used in formulation) 1.57 g/L
	Dermal absorption endpoints %	**3**	**3**

3.4.1 Acute toxicity

DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC), containing 360 g/L folpet and 10.7 g/L difenoconazole, has a low acute oral and dermal toxicity, is not irritating to the rabbit skin but is irritating to the rabbit eye and a skin sensitiser.

3.4.2 Operator exposure

Summary of critical use patterns (worst cases):

Crop	F/G[7]	Equipment *Application method*	Maximum application rate L/ha (g a.s./ha)	Minimum volume water (L/ha)
Apple and pear	F	Vehicle-mounted *Upward spraying*	3.5 L product/ha (37.45 g difenoconazole/ha + 1260 g folpet/ha)	300

Considering the proposed uses, operator systemic exposure was estimated using the EFSA model[8]:

Crop	Equipment	PPE and/or working coverall	% AOEL difenoconazole	% AOEL folpet
Apple and pear	Vehicle-mounted	Working coverall and gloves during mixing/loading and application	4.61	13.35

According to the model calculations, it may be concluded that the risk for the operator using DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) is acceptable with a working coverall and gloves during mixing/loading and application.

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

[7] Open field or glasshouse
[8] AOEM – Agricultural Operator Exposure Model (EFSA Journal 2014:12 (10):3874)

3.4.3 Worker exposure

EFSA model: Workers may have to enter treated areas after treatment for crop searching, reaching and picking activities. Therefore estimation of worker exposure was calculated according to the AOE model. Exposure is estimated to be 38 % of the AOEL of difenoconazole, with PPE, and 82.45 % of the AOEL of folpet, with PPE. It may be concluded that there is no unacceptable risk anticipated for the worker.

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

3.4.4 Bystander and resident exposure

EFSA model (without AAOEL): Consideration of acute exposure should only be made where an AAOEL has been established during an approval, review or renewal evaluation of an active substance, i.e. no acute operator or bystander exposure assessments can be performed with the AOE model where no AAOEL has been set[9].

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

EFSA model: Residential exposure was assessed according to the EFSA model. An acceptable risk was determined for residents (adult and/or child) without drift reduction technology but with 10 metres buffer zone mitigation measures :

Model (AOEM) - All pathways (mean)	**% AOEL difenoconazole**	**% AOEL folpet**
Resident (children)	12.45	29.56
Resident (adults)	6.58	14.21

3.4.5 Combined exposure

Currently no EU-harmonised guidance is available on the risk assessment of combined exposure to multiple active substances. Most assessment approaches employed up to now make use of the Hazard Index (HI) concept. It is therefore suggested to use this as a first tier assessment.

A cumulative assessment for operators, bystanders/residents and workers has been performed. At the first tier, combined exposure is calculated as the sum of the component exposures without regard to the mode of action or mechanism/target of toxicity.
Hazard quotients (HQ) for each active substance and the HI (sum of hazard quotients) are:

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

Population groups and PPE		Active ingredient	Estimated exposure / AOEL (HQ)
Operators	Working coverall and gloves during mixing/loading and application	**Difenoconazole**	0.0461
		Folpet	0.1335
	Cumulative risk operators (HI)		**0.21796**
Bystanders /Residents	Children - All pathways (mean)	**Difenoconazole**	0.1245
		Folpet	0.2956
	Cumulative risk bystanders/residents (child) (HI)		**0.4201**
	Adults - All pathways (mean)	**Difenoconazole**	0.0658
		Folpet	0.1421
	Cumulative risk bystanders/residents (adult) (HI)		**0.2079**
Worker	Working coverall and gloves	**Difenoconazole**	0.3829
		Folpet	0.8245
	Cumulative risk workers (HI)		**1.2074**

For operators and bystanders/residents, the Hazard Index is < 1.
Thus combined exposure to all active substances in DIFOL 360 (Difenoconazole 10.7 + Folpet 360 SC) is not expected to present a risk for operators, residents and bystanders. No further refinement of the assessment is required.

Combined exposure for workers to both active substances folpet and difenoconazole is unacceptable.
The Hazard Index is > 1 for workers.

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

Overall conclusion

The data available are considered sufficient for risk assessment. Any exceedence of the current MRLs for folpet and difenoconazole as laid down in Reg. (EU) 396/2005 is not expected.

The chronic and short-term intakes of folpet and difenoconazole residues resulting from the uses proposed in the framework of this application 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, provided that a longer PHI of 120 days than that requested (95 days) be applied, due to NEU data on folpet.

According to the available data, no specific mitigation measures should apply.

Data gaps: none.

Data required post-authorisation: none.

Summary for DIFENOCONAZOLE 10.7 + Folpet 360 SC (DIFOL 360)

Information on DIFENOCONAZOLE 10.7 + Folpet 360 SC

Crop	PHI for Difenoconazole 10.7 + Folpet 360 SC requested by applicant	PHI/withholding period* sufficiently supported for		PHI for Difenoconazole 10.7 + Folpet 360 SC proposed by zRMS	zRMS Comments (if different PHI proposed)
		Difenoconazole	Folpet		
Apple/pear	95 days	Yes	No	120 days	For France, a fall-back GAP with a longer PHI is proposed based on NEU trials.

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.

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

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

The PEC of difenoconazole, folpet and their metabolites in soil, surface water and groundwater have been assessed according to FOCUS guidance documents, with standard FOCUS scenarios to obtain outputs from the FOCUS models, and the endpoints established in the EU conclusions or agreed in the assessment based on new data provided.
PEC soil and PECsw derived for the active substances and their metabolites are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

PECgw for both actives substances and their metabolites do not occur at levels exceeding those mentioned in regulation EC 1107/2009 and guidance document SANCO 221/2000[10].
Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses.

As several azole active substances can be applied on a same field. Considering that 1,2,4-triazole can be formed from most of these azole active substances, an exceedance of the regulatory limit of 0.1 µg/L cannot be excluded. In order to ensure that the regulatory limit in groundwater is not exceeded for 1,2,4-triazole, all applicants of azole-based products are requested to set up a groundwater monitoring dedicated to this metabolite within two years.
Based on vapour pressure, information on volatilisation from plants and soil, and DT_{50} calculation, no significant contamination of the air compartment is expected for the intended uses.

[10] Guidance document on the assessment of the relevance of metabolites in groundwater of substances regulated under Council directive 91/414/EEC. Sanco/221/2000-rev10-final, 25 February 2003.

3.7 Ecotoxicology (Part B, Section 9)

The ecotoxicological risk assessment of the formulation was performed according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU conclusions for the active substances and their metabolites were used for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

Based on the guidance documents, the risks for birds, aquatic organisms, mammals, bees and other non-target arthropods, earthworms, other soil macro-organisms and micro-organisms and terrestrial plants are acceptable for the intended uses. Risk mitigations are required for aquatic organisms.

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

3.8 Relevance of metabolites (Part B, Section 10)

The difenoconazole metabolites CGA71019 and CGA205375, and the folpet metabolites phthalimide, phthalamic acid and phthalic acid are predicted to occur in groundwater at concentrations below 0.1 µg/L (see dRR Part B Section 8). Assessment of the relevance of these metabolites according to the stepwise procedure of the EC guidance document SANCO/221/2000 –rev.10 is therefore not required.

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

Difenoconazole is an identified candidate for substitution.

Step 2 (French guidance document 27 July 2015):

The identification of alternatives was carried out on the uses for which the substitution was not excluded at the end of step 1 of this French guidance document.

In accordance with Article 50(1) (b) of Regulation (EC) No 1107/2009:

- Taking into account the agronomic usefulness of other solutions:

In the absence of any other available solution showing a similar agronomic interest [i.e., usefulness] (product formulated with a similar mixture of a.s.s) and not presenting any major practical or economic inconvenience for the user, **substitution will not be considered for the use in question on pome fruits against scab(s)**.

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

When the conclusions of the assessment is “Not acceptable”, please refer to relevant summary under point 3 “Background of authorisation decision and risk management”.

5.1.1 Post-authorisation monitoring

N/A : no marketing authorisation granted.

5.1.2 Post-authorisation data requirements

N/A : no marketing authorisation granted.

Appendix 1 Copy of the product authorisation

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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 règlementaire,

Vu la demande d'autorisation de mise sur le marché du produit phytopharmaceutique ***DIFOL 360***

de la société *GLOBACHEM NV*

enregistrée sous le *n°2016-2023*

Vu les conclusions de l'évaluation de l'Anses du 13 novembre 2019,

Considérant que l'utilisation du produit peut présenter un risque d'effet nocif pour le travailleur,

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

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

DIFOL 360
AMM n°-

Page 1 sur 3

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Informations générales sur le produit	
Nom du produit	DIFOL 360
Type de produit	Produit de référence
Titulaire	GLOBACHEM NV Brustem Industriepark Lichtenberglaan 2019, 3800 Sint-Truiden, Belgique
Formulation	Suspension concentrée (SC)
Contenant	10,7 g/L - difénoconazole 360 g/L - folpel
Numéro d'intrant	577-2016.01
Numéro d'AMM	-
Fonction	Fongicide
Gamme d'usage	Professionnel

A Maisons-Alfort le, 28 MAI 2020

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

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ANNEXE I : Conditions de mise sur le marché demandé

Liste des usages refusés

Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
12603203 Pommier*Trt Part.Aer.* Tavelure(s)	3,5 L/ha	3/an	95
	Motivation du refus : L'usage est refusé en raison d'un risque d'effet nocif pour les travailleurs et au motif que les données fournies ne sont pas suffisantes pour démontrer l'efficacité du produit.		

Appendix 2 Copy of the product label

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

Globachem nv
Brustem Industriepark • Lichtenberglaan 2019
BE-3800 Sint-Truiden • Belgium
Tel. +32 (0)11 78 57 17 • Fax +32 (0)11 68 15 65
E-mail: globachem@globachem.com • Website: www.globachem.com
BTW: BE 0473.590.226 • H.R. Hasselt: 105.213 • BIC: KREDBEBB
Bank: KBC 735-0020421-39 • IBAN: BE13 7350 0204 2139

Projet d'étiquette

DIFOL 360

Fongicide foliaire en pommier, poirier.

Contient 10.7 g/L (0.9 % p/p) de difenoconazole et 360 g/L (30.32%) de folpet sous forme de suspension concentrée (SC)

DANGER

H317: Nocif en cas d'ingestion
H318: Provoque des lésions oculaires graves
H332: Nocif par inhalation
H351: Susceptible de provoquer le cancer
H410: Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme
P201: Se procurer les instructions avant utilisation
P280: Porter des gants de protection, des vêtements de protection, un équipement de protection des yeux, un équipement de protection du visage
P305+P351+P338: EN CAS DE CONTACT AVEC LES YEUX: rincer avec précaution à l'eau pendant plusieurs minutes. Enlever les lentilles de contact si la victime en porte et si elles peuvent être facilement enlevées. Continuer à rincer
P308+P313: En cas d'exposition prouvée ou suspectée : consulter un médecin
P333+P313 : En cas d'irritation ou d'éruption cutanée : consulter un médecin
P310 : Appeler immédiatement un centre antipoison ou un médecin
P501: Éliminer le contenu/récipient selon les Directives nationales
EUH401: Respectez les instructions d'utilisation pour éviter les risques pour la santé humaine et l'environnement.
SP1 : Ne pas polluer l'eau avec le produit ou son emballage
SPe3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 50 m avec dispositif végétalisé de 20 m par rapport aux points d'eau
SPe3 : Pour protéger les arthropodes non-cibles, respecter une zone non traitée de 5 m par rapport à la zone non cultivée adjacente.
Délai de rentrée dans la culture : 24 heures en application de l'arrêté du 12 septembre 2006.

En cas d'urgence appelez le 15 ou le centre antipoison puis signalez vos symptômes au réseau Phyt'attitude, numéro vert 0800 887 887 (appel gratuit depuis un poste fixe).

Conserver le produit dans l'emballage original et fermé dans un endroit sec, frais et sombre, à l'abri du gel. Bien agiter avant l'emploi

N° du lot et date de fabrication : voir sur le bidon

Contenu: 5 litres

Globachem

Détenteur d'AMM:
Globachem NV
Brustem Industriepark, Lichtenberglaan 2019, 3800 Sint-Truiden
Belgique
Tel. +32 (0)11 78 57 17
Fax. +32 (0)11 68 15 65

Fiche de données de sécurité disponible sur simple appel au 04 78 83 40 66 ou sur le site www.quickfds.com, 24h/24 Numéro d'appel d'urgence : 0032 14 58 45 45

CHAMP D'ACTIVITE

DIFOL 360 est un fongicide composé de difenoconazole, matière active appartenant à la famille chimique des triazoles (code FRAC 3) et de folpet, matière active appartenant à la famille chimique des phthalimides (code FRAC M4).

USAGES, DOSES D'EMPLOI ET CONDITIONS D'APPLICATION

Usage	Cultures cibles recommandées	Cibles	Dose autorisée (L/ha)	Nombre d'applications max/an	Délai avant récolte (DAR)
Pommier* Trt Part.Aer.*Tavelure(s)	Pommier, Poirier,	Tavelures (*Venturia inaequalis* et *Venturia pyrina*)	3.5	3	95 jours

L'utilisation du DIFOL 360 sur ces usages autorisés n'est recommandée que sur les cultures mentionnées dans le tableau ci-dessus. Globachem N.V. décline en conséquence toute responsabilité en cas d'utilisation du produit sur des cultures ou pour des cibles non recommandées.

Traiter en fonction des avertissements et selon les recommandations de votre distributeur et au plus tard lors de l'apparition des premiers symptômes.
Volume d'eau : 300 à 1000 L/ha
Les limites maximales de résidus sont consultables à l'adresse suivante : http://ec.europa.eu/food/plant/protection/pesticides/index_fr.htm

MODE D'EMPLOI PAR CULTURE

Pommier, poirier : selon les avertissements agricoles.

PREPARATION DE LA BOUILLIE

Verser DIFOL 360 dans la cuve du pulvérisateur à moitié remplie d'eau. Compléter le volume d'eau par la suite. Pulvériser immédiatement après la préparation de la bouillie. Maintenir une bonne agitation durant le remplissage et le temps du traitement.

COMPATIBILITE

Les mélanges doivent être mis en œuvre conformément à la réglementation en vigueur et aux recommandations des guides de bonnes pratiques officiels. En cas d'utilisation en mélange avec un autre produit, il est obligatoire de réaliser un test préalable pour vérifier la compatibilité physique et biologique selon les conditions particulières de l'exploitation. Notre société décline toute responsabilité sur les conséquences résultant du mélange de différents produits.

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GESTION DU RISQUE DE RÉSISTANCE

L'utilisation répétée, sur une même parcelle, de préparations à base de substances actives de la même famille chimique ou ayant le même mode d'action, peut conduire à l'apparition d'organismes résistants.
Pour réduire ce risque, il est conseillé d'alterner ou d'associer, sur une même parcelle, des préparations à base de substances actives de familles chimiques différentes ou à modes d'action différents, tant au cours d'une saison culturale que dans la rotation. En l'occurrence, il convient de limiter le nombre d'application d'IDM à trois par saison dans le cadre de la lutte contre la tavelure du pommier.
En dépit du respect de ces règles, on ne peut pas exclure une altération de l'efficacité de cette préparation liée à ces phénomènes de résistance. De ce fait, Globachem NV décline toute responsabilité quant à d'éventuelles conséquences qui pourraient être dues à de telles résistances.
Consultez votre distributeur pour connaître les cas avérés de résistance au niveau de votre région.

PRECAUTIONS D'EMPLOI

Pendant le stockage :
• Conserver le produit uniquement dans l'emballage d'origine, à l'abri de l'humidité, du gel, dans un endroit frais, aéré et ventilé, à l'écart des aliments et boissons y compris ceux pour animaux. Conserver hors de la portée des enfants.

Pendant la préparation de la bouillie et en cours d'application :
• Ne pas manger, boire, fumer.
• Porter un vêtement de protection approprié, des gants et un appareil de protection des yeux et du visage, selon la règlementation en vigueur.
• Vérifier régulièrement et maintenir le bon état et le réglage du matériel d'application, en conformité avec la législation.
• Surveiller le remplissage de la cuve du pulvérisateur et ajuster le volume de bouillie (clapet anti-retour, dispositif de surverse).
• Ne pas souffler dans les buses pour tenter de les déboucher.
• En cas de contact avec la peau et les yeux, laver immédiatement et abondamment avec de l'eau et consulter un spécialiste.
• En cas d'ingestion consulter immédiatement un CENTRE ANTIPOISON ou un médecin et lui montrer l'emballage ou l'étiquette.
• Ne pas respirer les vapeurs, ni le brouillard de pulvérisation.
• Ne pas pulvériser à proximité des points d'eau (mares, cours d'eau, fossés...).
• Ne pas traiter en présence de vent afin de respecter les cultures voisines.
• En présence d'un léger vent (3/4 m/s) préférer les buses à limitation de dérive

Après application :
• Eliminer les fonds de cuve et les eaux de rinçage conformément à la réglementation en vigueur.
• Ne pas conserver la bouillie de pulvérisation dans la cuve plus de 48 heures.
• Nettoyer très soigneusement avec un produit adapté (type Phytnet) et rincer le pulvérisateur aussitôt après le traitement conformément à la réglementation en vigueur.
• Immédiatement après l'application, nettoyer les équipements de protection, se laver les mains à l'eau savonneuse, prendre une douche et changer de vêtements.

PROTECTION DE L'OPERATEUR ET DU TRAVAILLEUR

A ajouter sur base de la décision

ELIMINATION DU PRODUIT ET DES EMBALLAGES

Lors de l'utilisation du produit, rincer le bidon 3 fois en veillant à verser l'eau de rinçage dans la cuve du pulvérisateur. Pour l'élimination des produits non utilisables, faire appel à une entreprise habilitée pour la collecte et l'élimination des produits dangereux. Réutilisation de l'emballage interdite. Eliminer les emballages vides via une collecte organisée par un service de collecte spécifique.

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IMPORTANT

Respectez les usages, doses, conditions et précautions d'emploi mentionnées sur l'emballage, qui ont été déterminées en fonction des caractéristiques du produit et des applications pour lesquelles il est autorisé. Conduisez sur ces bases, la culture et les traitements selon la bonne pratique agricole, en tenant compte, sous votre responsabilité, de tous les facteurs particuliers concernant votre exploitation, tels que la nature du sol, les conditions météorologiques, les méthodes culturales, les variétés végétales, la résistance des espèces, …
Compte tenu de la diversité des législations existantes, il est recommandé, dans le cas où les denrées protégées avec cette spécialité sont destinées à l'exportation, de vérifier la réglementation en vigueur dans le pays importateur. Le fabricant garantit la qualité de ses produits vendus dans leur emballage d'origine ainsi que leur conformité à l'autorisation de vente du Ministère de l'Agriculture. Globachem NV ne saurait être tenu en aucun cas responsable des conséquences inhérentes à toute copie de cette étiquette et la diffusion ou à l'

GARANTIE

Le fabricant ne donne aucune garantie, explicite ou implicite, relative à l'utilisation du produit d'une autre manière que celle indiquée sur l'étiquette. L'utilisateur sera responsable des risques liés à l'utilisation et/ou la manipulation et/ou l'entreposage de ce produit en cas de non-respect des recommandations de l'étiquette.

RESPONSABILITES

En cas de non-respect de la garantie ou de négligence, le recours de l'utilisateur sera limité au remboursement de dommages et intérêts, à concurrence du prix d'achat, à l'exclusion de tout autre dommage.

Appendix 3 Letter of Access

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