

REGISTRATION REPORT
Part A
Risk Management

Product code: -

Product name: KINVARA

Chemical active substances:

**MCPA, 233 g/L
fluroxypyr, 50 g/L
clopyralid, 28 g/L**

National application: France

**NATIONAL ASSESSMENT FRANCE
(New application)**

**Applicant: Barclay Chemicals (R&D) Ltd
Date: 2021/02/23**

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PART A

RISK MANAGEMENT

1 Details of the application

The company Barclay Chemicals (R&D) Ltd has requested a marketing authorisation in France for the product KINVARA (no product code is allocated), containing 233 g/L MCPA¹, 50 g/L fluroxypyrr² and 28 g/L clopyralid¹, as a herbicide for professional uses.

The risk assessment conclusions provided in this document are based on the information, data and assessments provided in the Registration Report (RR), Part B Sections 1-10 and Part C. 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 KINVARA where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of KINVARA have been made using endpoints agreed in the EU peer reviews of MCPA, fluroxypyrr and clopyralid.

This document describes the specific conditions of use and labelling required for France for the registration of KINVARA.

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 Letters of Access.

1.1 Application background

The present registration report concerns the evaluation of Barclay Chemicals (R&D) Ltd's application to market KINVARA in France as a herbicide (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the first authorisation of this product in France and in other MSs of the Southern zone.

The present application (2018-3461) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses) in the context of a national procedure, taking into account the worst-case uses (“risk envelope approach”)³ – 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 1107/2009⁴, implementing regulations, and French regulations.

¹ 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.

² Commission Implementing Regulation (EU) 2017/856 of 18 May 2017 amending Implementing Regulation (EU) No 540/2011 as regards the conditions of approval of the active substance fluroxypyrr.

³ 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](#)

⁴ REGULATION (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC.

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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 on the acceptability of risk are based on the criteria provided in Regulation (EU) No 546/2011⁵, and are expressed as “acceptable” or “not acceptable” in accordance with those criteria.

1.2 Letters of Access

Not necessary for fluroxypyr: the applicant is part of the fluroxypyr task force, having supported the renewal of approval for fluroxypyr.

The applicant has provided letters of access for clopyralid and MCPA data. These letters of access are available upon request.

1.3 Justification for submission of tests and studies

According to the applicant: “*KINVARA was not the representative formulation for Annex I inclusion of MCPA, clopyralid and/or fluroxypyr and was not evaluated at EU level. However, KINVARA has been submitted & evaluated according to Uniform Principles to other Member States. Authorisation for KINVARA has been granted in the UK (MAPP 18436). Other Member State authorisation decisions are pending.*”

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of KINVARA, 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	None.
Product name in MS	KINVARA.
Authorisation number	N/A : no marketing authorisation granted
Low risk (article 47)	No.
Function	Herbicide.
Applicant	Barclay Chemicals (R&D) Ltd.

⁵ COMMISSION REGULATION (EU) No 546/2011 of 10 June 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards uniform principles for evaluation and authorisation of plant protection products

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Active substances (incl. content)	MCPA, 233 g/L ⁶ ; fluroxypyr, 50 g/L ⁷ ; cetylpyralid, 28 g/L ⁸ .
Formulation type	Micro-emulsion [ME]
Packaging	N/A : no marketing authorisation granted
Coformulants of concern for national authorisations	-
Restrictions related to identity	The maximum impurity content of the co-formulant, aromatic C10 hydrocarbons (EEC No. 918-811-1), in the product KINVARA must be respected (naphthalene < 1 %).
Mandatory tank mixtures	None.
Recommended tank mixtures	None.

2.2 Conclusion

The evaluation of the application for KINVARA resulted in the decision **to refuse the authorisation, risks cannot be excluded for groundwater and aquatic organism.**

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 classes, categories:	Acute Toxicity, category 4. Eye irritation, category 2. Skin Sensitisation, category 1. Hazardous to the aquatic environment, chronic hazard, category 2.
Hazard pictograms:	  GHS07 GHS09
Signal word:	Warning.
Hazard statement(s):	H302: Harmful if swallowed. H317: May cause an allergic skin reaction. H319: Causes serious eye irritation. H411: Toxic to aquatic life with long-lasting effects.

⁶ 277.3 g/L in the form of the potassium salt.

⁷ 72 g/L in the form of the methyl ester.

⁸ 36.9 g/L in the form of the ethanolamine salt.

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Precautionary statement(s):	<i>For the P phrases, refer to the existing legislation.</i>
Additional labelling phrases:	

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)

N/A : no marketing authorisation granted

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 2017⁹ 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 2014¹⁰ 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 extrapolation¹¹ 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

⁹ Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjutants visés à l'article L. 253-1 du code rural et de la pêche maritime, modifié par l'arrêté du 27 décembre 2019 : <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGR1632554A/jo/texte> ; <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000039686039&categorieLien=id>

¹⁰ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGR1407093A/jo>

¹¹ SANCO document “guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/ 7525/VI/95 - rev.9

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mitigation measures.

2.5.1 Restrictions linked to the PPP

N/A : no marketing authorisation granted

2.5.2 Specific restrictions linked to the intended uses

N/A : no marketing authorisation granted

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2.6 Intended uses (only NATIONAL GAP)

Please note: The GAP Table below reports the intended uses proposed by the applicant, and possible extrapolation according to French Order of 26 March 2014 (highlighted in green), evaluated by France as zRMS.. When the conclusion is "not acceptable", the intended use is highlighted in grey and the main reason(s) reported in the remarks.

			GAP rev. 1, date: 2021-02-23
PPP (product name/code):	KINVARA/-	Formulation type:	Micro-emulsion (ME) ^(a, b)
Active substance 1:	MCPA	Conc. of a.s. 1:	233 g/L ^(c)
Active substance 2:	fluroxypyr	Conc. of a.s. 2:	50 g/L ^(c)
Active substance 3:	clopyralid	Conc. of a.s. 3:	28 g/L ^(c)
Safener:	-	Conc. of safener:	-
Synergist:	-	Conc. of synergist:	-
Applicant:	Barclay Chemicals (R&D) Ltd	Professional use:	<input checked="" type="checkbox"/>
Zone(s):	Southern Zone ^(d)	Non-professional use:	<input type="checkbox"/>
Verified by MS:	Yes		
Field of use:	herbicide		

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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/Ki nd	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/ma x		
Zonal uses (field or outdoor uses, certain types of protected crops)													
1	FR	Wheat (winter & spring) (TRZSS), TTLSO, TRZSP Rye	F	Annual and perennial broadleaf weeds	Foliar spray	BBCH 24 - 39	a) 1 b) 1	-	a) 3 b) 3	a) 933 total* b) 933 *comprising: 699 g MCPA, 150 g fluroxypyr, and 84 g cypyralid	200 – 400	F	Not acceptable : risks for groundwater and aquatic organisms <i>Efficacy demonstrated against dicotyledonous weeds</i>
2	FR	Barley, Oat	F	Annual and perennial broadleaf weeds	Foliar spray	BBCH 24 - 39	a) 1 b) 1	-	a) 3 b) 3	a) 933 b) 933	200- 400	F	Not acceptable Risks for groundwater and aquatic organisms <i>Efficacy demonstrated against dicotyledonous weeds</i>

* As some standards may have undergone changes, it is the responsibility of the applicant to update the reference.

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.

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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 Background of authorisation decision and risk management

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

KINVARA is a micro-emulsion (ME) formulation. All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is a translucent reddish-brown liquid, without strong odour. It is not explosive and has no oxidising properties. The product is not flammable. It has a self-ignition temperature above 388 °C. In aqueous solution (1 %), it has a pH value of 5.87 at room temperature. There is no effect of low and high temperatures on the stability of the formulation, since after seven days at 0 °C and 14 days at 54 °C, neither the active substances' content nor the technical properties were changed. The stability data indicate a shelf life of two years at ambient temperature when stored in HDPE. The technical characteristics are acceptable for a micro emulsion (ME) formulation.

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

The stability in PET commercial packaging was not demonstrated. This packaging cannot therefore be accepted without accelerated storage or a two years' storage study of the product in PET packaging. Extrapolation from HDPE and f-HDPE is not possible.

3.2 Efficacy (Part B, Section 3)

Considering the data submitted:

3.3 Efficacy data

The efficacy level of KINVARA is considered satisfactory for all the claimed uses, for post-emergence application on dicotyledonous weeds.

3.3.1 Information on the occurrence or possible occurrence of the development of resistance

There is a risk of resistance developing or appearing to MCPA, fluroxypyr and clopyralid, in particular for *Papaver rhoes*. This requires monitoring on straw-based cereals.

Resistance monitoring data: monitoring of resistance to MCPA, fluroxypyr and clopyralid should be put in place on the basis of field efficacy failure in straw-based cereal crops, in particular for *Papaver rhoes*. Any new information which would change the resistance risk analysis should be provided to the competent authorities for all uses. The data and results should be provided for the re-authorisation of the product.

3.3.2 Adverse effects on treated crops

The selectivity level of KINVARA is considered acceptable for all the claimed uses.

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The risks of negative impact on yield, quality, transformation processes and propagation are considered acceptable.

3.3.3 Observations on other undesirable or unintended side-effects

The risk of negative impact on succeeding crops is considered acceptable. However, special attention should be paid to the conditions when sowing or planting succeeding and replacement crops.

The risk of negative impact on adjacent crops is considered acceptable. However, special attention should be paid to the conditions of application close to adjacent crops.

3.4 Methods of analysis (Part B, Section 5)

3.4.1 Analytical method for the formulation

Analytical methods for the determination of the active substances MCPA and clopyralid in the formulation are available and validated. As these active substances do not contain relevant impurities, no analytical method is required.

Analytical methods for the determination of the active substance fluroxypyr-meptyl and its relevant impurity N-methyl-2-pyrrolidone (NMP) in the formulation are available and validated.

3.4.2 Analytical methods for residues

Analytical methods are available in the Draft Assessment Report (DAR) and this dossier and validated for the determination of residues of MCPA, clopyralid and fluroxypyr-meptyl in plants, foodstuffs of animal origin, soil, water (surface and drinking) and air. Nevertheless, some data gaps were identified and information will be required at the renewal of the active substances' approvals.

Analytical methods for the determination of the active substances in body fluids and tissues will be required at the renewal of the active substances' approvals.

3.5 Mammalian toxicology (Part B, Section 6)

Endpoints used in risk assessment:

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Active substances (incl. content)	MCPA 233 g/L	Fluroxypyr 50 g/L	Clopyralid 28 g/L
AOEL systemic	0.04 mg/kg bw/d	0.8 mg/kg bw/d	1 mg/kg bw/d
AAOEL	none	none	none
Inhalation absorption (%)	100	100	100
Vapour pressure (Pa)	4×10^{-4} (32 °C)	3.8×10^{-9} (20 °C)	1.36×10^{-3} (25 °C)
Oral absorption (%)	100	100	100
Dermal absorption (%)	Concentrate: 19 Dilution: 11 (1.75 g/L) (Based on product)	Concentrate: 70 Dilution: 70 (Default)	Concentrate: 70 Dilution: 70 (Default)

3.5.1 Acute toxicity

KINVARA has a low acute, inhalational and dermal toxicity. It is not irritating to the rabbit skin. However, it appears to be harmful if swallowed, irritating to the rabbit eye and possibly a skin sensitisier (default classification).

3.5.2 Operator exposure

Considering the proposed uses, operator systemic exposure was estimated using the EFSA model¹²:

		MCPA	Clopyralid	Fluroxypyr
Model data	Level of PPE	% of systemic AOEL	% of systemic AOEL	% of systemic AOEL
Tractor-mounted boom spray application outdoors to cereals Application rate: 3 L product/ha (699 g MCRA/ha; 84 g clopyralid/ha; 150 g fluroxypyr/ha)				
EFSA calculator (75 th percentile, long-term exposure) Body weight: 60 kg	Work-wear and gloves during mixing and loading and application	24.5	0.61	1.2

According to the model calculations, it may be concluded that the risk for the operator using KINVARA is acceptable with a working coverall and gloves during mixing/loading and application.

3.5.3 Worker exposure

Workers may have to enter treated areas after treatment for crop inspection and/or irrigation tasks. Therefore, estimation of worker exposure was calculated according to the EFSA model. Exposure is summarised in the table below:

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

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		MCPA	Clopyralid	Fluroxypyr
Model data	Level of PPE	% of systemic AOEL	% of systemic AOEL	% of systemic AOEL
Inspection, irrigation Outdoor Work rate: 2 hours/day DT50: 30 days DFR: 3 µg/cm ² /kg a.s./ha Interval between treatments: 365 days				
Number of applications x application rate (g/ha):		1 x 699	1 x 84	1 x 150
EFSA calculator Body weight: 60 kg	Work wear TC: 1400 cm ² /person/h ⁽⁴⁾	46.5	0.82	1.8

There is no unacceptable risk anticipated for the worker re-entering into areas treated with KINVARA.

3.5.4 Bystander and resident exposure

➤ BYSTANDER EXPOSURE

Consideration of acute exposure should only be made where an AAOEL has been established during an approval, review or renewal evaluation of an active substance, i.e., no acute operator or bystander exposure assessments can be performed with the AOEM model where no AAOEL has been set¹³.

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.*”

➤ RESIDENT EXPOSURE

Residential exposure was assessed according to the EFSA model, incorporating a distance of 3 metres from the spray boom without drift-reduction technology. An acceptable risk was determined for residents (adult and child):

		MCPA	Clopyralid	Fluroxypyr
Model data		% of systemic AOEL	% of systemic AOEL	% of systemic AOEL
Tractor-mounted boom spray application outdoors to low crops (bare soil) Buffer zone: 2-3 (m) Drift-reduction technology: no DT ₅₀ : 30 days DFR: 3 µg/cm ² /kg a.s./ha				
Number of applications x application rate (g/ha)		1 x 699	1 x 84	1 x 150

¹³ 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)

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Resident child Body weight: 10 kg	Sum (mean)	66%	1.4%	3.0%
Resident adult Body weight: 60 kg	Sum (mean)	30%	0.58%	1.3%

3.5.5 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 was performed. At the first tier, combined exposure was 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:

Population groups and PPE		Estimated exposure / AOEL (HQ)
Operators	Cumulative risk operators (HI) Work-wear and gloves during M/L and application	0.26
Bystanders/ Residents	Cumulative risk bystanders/residents (child) (HI) ZNT = 3 m; no drift-reduction technology	0.71
	Cumulative risk bystanders/residents (adult) (HI) ZNT = 3 m; no drift-reduction technology	0.32
Worker	Cumulative risk workers (HI) Work-wear	0.49

The Hazard Index is < 1. Thus combined exposure to all active substances in KINVARA is not expected to present a risk for operators, workers, residents and bystanders. No further refinement of the assessment is required.

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

The data available are considered sufficient for risk assessment purposes. No exceedance of the current MRL of cereals for MCPA, fluroxypyr and clopyralid as laid down in Regulation (EU) No 396/2005 is expected.

The chronic and short-term intakes of MCPA, fluroxypyr and clopyralid 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 intended uses.

According to the available data, the following specific mitigation measures are recommended:

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- wait for 125 days after application to grow a new crop on which clopyralid is not authorised. Crops grown less than 125 days after application must not be treated with clopyralid.
- root and tuber crops should not be grown as rotational crops after an application of fluroxypyr before an elapsed time interval of 10 months.

Data gaps

None.

Summary of the evaluation

KINVARA contains MCPA, fluroxypyr and clopyralid.

Summary for KINVARA**Table 3.6-1: Information on KINVARA (KCA 6.8)**

Crop	PHI for KIN-VARA proposed by applicant	PHI/withholding period* sufficiently supported for			PHI for KIN-VARA proposed by zRMS	zRMS Comments (if different PHI proposed)
		MCPA	Fluroxypyr	Clopyralid		
Wheat (winter & spring) Rye Triticale	F (BBCH 24-39)	Yes	Yes	Yes		
Barley, Oat	F (BBCH 24-39)	Yes	Yes	Yes		

NR: not relevant

* A withholding period has not been specified by the applicant.

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

Table 3.6-2: Waiting periods before planting succeeding crops

	Waiting period before planting succeeding crops				Overall waiting period proposed by zRMS for KINVARA
	Crop group	Led by MCPA	Led by fluroxypyr	Led by clopyralid	
Crops on which clopyralid is authorised	Root vegetables	-	10 months	-	For root crops, a waiting period of 10 months after treatment with fluroxypyr before planting or sowing is required.
Crops on	Root vegetables	-	10 months	4 months	Do not grow

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which clopyralid is not authorised	Other crops	-	-	4 months	other crops in the treated field less than four months (10 months for root and tuber crops) after application of clopyralid
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NR: not relevant

3.7 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 predicted environmental concentration (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 values of MCPA, fluroxypyr and clopyralid 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} values derived for the active substances and their metabolites are used for the ecotoxicological risk assessment.

PEC_{sw} values derived for fluroxypyr and its metabolites, MCPA and clopyralid are used for the ecotoxicological risk assessment. **FOCUS STEP 3 PEC_{sw} values derived for metabolite PCOC¹⁴ cannot be used to finalise the risk assessment for aquatic organisms. This is because of major deviations identified in the calculations** (formation fractions in soil, surface water and sediment are not in line with the recommendations of the guidance document).

PEC_{gw} values for fluroxypyr and its metabolites, and MCPA do not occur at levels exceeding those mentioned in Regulation (EC) No 1107/2009 and guidance document SANCO 221/2000. **However, no acceptable PEC_{gw} calculations are available for metabolite PCOC and clopyralid. Therefore, the risk assessment for groundwater contamination cannot be finalised for the intended uses.**

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

3.8 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

¹⁴ PCOC: 4-chloro-2-methylpheno (metabolite formed from MCPA)

were highlighted and justified accordingly.

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

- To protect non-target plants, respect an unsprayed buffer zone of 5 metres to non-agricultural land.

For aquatic organisms, the risk assessment cannot be finalised, as no relevant information has been provided to refine the default Regulatory Acceptable Concentration (RAC) values for metabolite PCOC of MCPA.

Regarding bees, according to new requirements of Regulation (EU) No 284/2013, data on chronic effects on adult bees and on the development of bees should have been submitted by applicant as exposure of bees to the formulation cannot be excluded. In the Ehmke (2014b) study, provided information allow to consider that no effect on bee larvae is expected after application of KINVARA as intended. However, the study is not appropriate to fulfil the data requirement regarding chronic toxicity to adults. Therefore, the risk to bees cannot be completely fulfilled and thus the risk for bees is not finalised.

3.9 Relevance of metabolites (Part B, Section 10)

An assessment was conducted according to the Steps described in the SANCO/221/2000 guidance document. Please refer to 3.7 for conclusion on the risk of groundwater contamination.

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

The active substances MCPA, fluroxypyr and clopyralid are not approved as candidates for substitution, therefore a comparative assessment is not foreseen.

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 Post-authorisation monitoring

N/A : no marketing authorisation granted

5.2 Post-authorisation data requirements

N/A : no marketing authorisation granted

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Appendix 1 Copy of the product authorisation



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

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

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

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

de la société **BARCLAY CHEMICALS R&D LTD**
enregistrée sous le n°2018-3461

Vu les conclusions de l'évaluation de l'Anses du 26 novembre 2020.

Considérant qu'un risque inacceptable de contamination des eaux souterraines, lié à l'utilisation du produit, ne peut être exclu.

Considérant également qu'un risque d'effet inacceptable pour les organismes aquatiques, lié à l'utilisation du produit, ne peut être exclu.

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

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

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Informations générales sur le produit	
Nom du produit	KINVARA
Type de produit	Produit de référence
Titulaire	BARCLAY CHEMICALS R&D LTD Damastown Way, Damastown Industrial Park, Malahide, 15 DUBLIN Irlande
Formulation	Micro-émulsion (ME)
Contenant	36,9 g/L - cropyralid sel de monoéthanolamine (équivalent à 28 g/L de cropyralid) 277,3 g/L - MCPA sel de potassium (équivalent à 233 g/L de MCPA) 72 g/L - fluoxypyr-méthyl (équivalent à 50 g/L de fluoxypyr)
Numéro d'intrant	9984-2018.01
Numéro d'AMM	-
Fonction	Herbicide
Gamme d'usage	Professionnel

A Maisons-Alfort, le

23 FEV. 2021

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



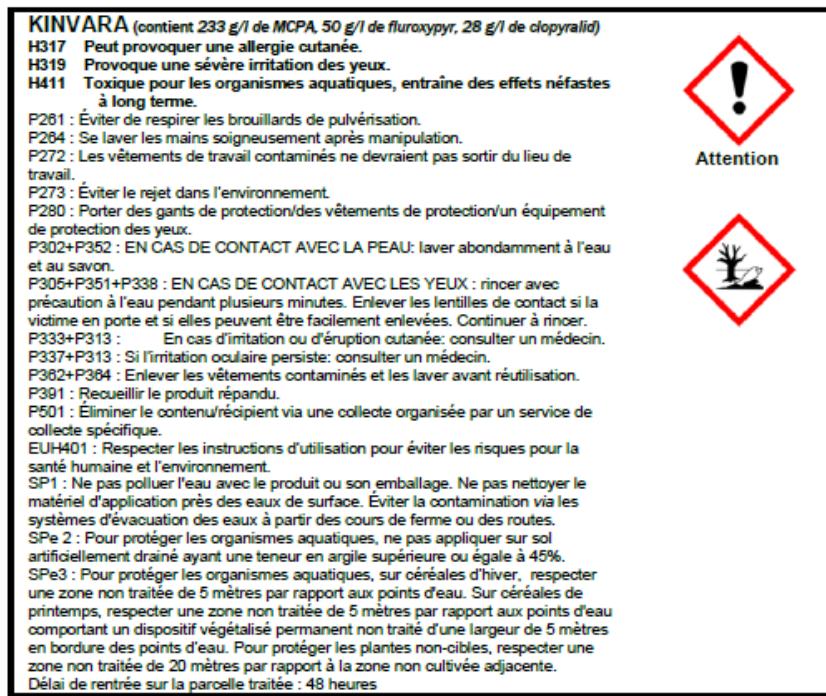
ANNEXE I : Conditions de mise sur le marché demandées

Liste des usages refusés

Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
15105911 Avoine*Désherbage	3 L/ha	1/an	F (BBCH 39)
Motivation du refus : L'usage est refusé car les données disponibles ne permettent pas d'exclure un risque d'effet inacceptable pour les organismes aquatiques ni d'exclure un risque inacceptable de contamination des eaux souterraines.			
15105912 Blé*Désherbage	3 L/ha	1/an	F (BBCH 39)
Motivation du refus : L'usage est refusé car les données disponibles ne permettent pas d'exclure un risque d'effet inacceptable pour les organismes aquatiques ni d'exclure un risque inacceptable de contamination des eaux souterraines.			
15105913 Orge*Désherbage	3 L/ha	1/an	F (BBCH 39)
Motivation du refus : L'usage est refusé car les données disponibles ne permettent pas d'exclure un risque d'effet inacceptable pour les organismes aquatiques ni d'exclure un risque inacceptable de contamination des eaux souterraines.			
15105915 Seigle*Désherbage	3 L/ha	1/an	F (BBCH 39)
Motivation du refus : L'usage est refusé car les données disponibles ne permettent pas d'exclure un risque d'effet inacceptable pour les organismes aquatiques ni d'exclure un risque inacceptable de contamination des eaux souterraines.			

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.



A.M.M. n° XXXXXX
 délivrée le DD/MM/YYYY

Micro-émulsion (ME)
 Substances actives :
 233 g/l de MCPA, 50g/l de
 fluoxypyrr, 28g/l de
 clopyralid

Kinvara est un herbicide
 systémique contre les
 dicotylédones dans les
 cultures de céréales d'hiver
 et de printemps

RÉSERVÉ À UN USAGE
 STRICTEMENT
 PROFESSIONNEL

1/22xxx-fx

1, 2, 2.5, 5, 10, 20 Litres



Fabriqué par : Barclay Chemicals Manufacturing Ltd.
 Damastown Way, Damastown Industrial Park, Mulhuddart, Dublin 15, Irlande
 Tél : +353 1 811 2900 Fax : +353 1 822 4678 E-mail : info@barclay.ie Site Internet : www.barclay.ie
 Débiteur de l'A.M.M. : Barclay Chemical Ltd.
 Damastown Way, Damastown Industrial Park, Mulhuddart, Dublin 15, Irlande
 Tél. : +353 1 811 2900 Fax : +353 1 822 4678 E-mail : info@barclay.ie Site internet : www.barclay.ie
 Copyright © Barclay Chemicals (R&D) Ltd, 2018.

Kinvara est une marque déposée de Barclay Chemicals (R&D) Ltd.

Distribué par: XXXX

N° de lot et date de fabrication : voir emballage

En cas d'urgence,appelez le 15 ou le centre anti-poison puis signalez vos symptômes au réseau Phyt'Attitude, N° vert 0 800 887 887 (appel gratuit depuis un poste fixe).

Fiche de données de sécurité disponible sur demande pour les professionnels : consulter notre site internet www.barclay.ie

Le fabricant garantit uniquement la qualité du produit. Ne pouvant contrôler l'application et l'emploi, il ne peut garantir les résultats et n'accepte aucune responsabilité pour les dégâts qui pourraient résulter de l'application.

USAGES ET DOSES AUTORISÉS

Culture	Organisme nuisible	Dose homologuée	Stade d'application	Nombre maximal de traitements par an	Délai avant récolte (DAR)	ZNT Organismes aquatiques
Blé d'hiver et de printemps, orge d'hiver et de printemps, avoine, seigle et triticale	dicotylédones annuelles et vivaces	3 L/ha	entre les stades BBCH 24 (4 talles) et 39 (dernière feuille étalée, ligule visible)	1	Application au stade BBCH 39 maximum	Céréales d'hiver : 5 m Céréales de printemps : 5 m avec dispositif végétalisé permanent de 5 m

RESPECT DES LIMITES MAXIMALES DE RESIDUS (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.

RESTRICTIONS

Ne pas appliquer KINVARA sur des cultures souffrant de stress dû à la sécheresse, à un excès d'eau, à de basses températures, à une attaque de parasites ou de maladie, à une carence en éléments nutritifs ou en chaux ou à tout autre facteur ralentissant la croissance des cultures.

Lors de l'application de KINVARA, respecter une distance de 20 mètres avec les plantes non ciblées.

CONTROLE DES ADVENTICES

KINVARA est un herbicide employé pour le contrôle de mauvaises herbes dicotylédones annuelles et vivaces dicotylédones dans les cultures de céréales. Ce produit se compose d'un mélange de trois substances actives, chacune imitant l'action de l'auxine - acideindole-3-acétique (IAA), mais présentant aussi un spectre d'activité légèrement différent. C'est la raison pour laquelle cette association offre un éventail herbicide plus important que chacune des substances actives utilisées individuellement.

Une application au stade plantule des adventices, en conditions poussantes, renforcera l'efficacité de KINVARA.

PREPARATION DE LA BOUILLIE

Porter des équipements de protection individuels pendant toutes les phases de mélange/chargement, de traitement et de nettoyage du matériel de pulvérisation (cf. Précautions de l'utilisateur).

Bien agiter le bidon avant utilisation. Remplir à moitié la cuve avec de l'eau et mettre en marche l'agitation. Verser la quantité nécessaire de KINVARA dans la cuve. Remplir la cuve avec de l'eau au volume requis. Maintenir l'agitation durant toute la durée de l'application.

APPLICATION

Utiliser un automoteur ou un pulvérisateur tracté. Pulvériser à moyen débit à 2-2,5 bars (30-35 psi), à raison de 200-400 L d'eau/ha pour couvrir entièrement les adventices ciblées. Augmenter le volume de bouillie sur les cultures denses ou si les adventices ont déjà bien poussé.

Appliquer sur feuillage sec. Ne pas pulvériser en cas de prévisions de pluies. Éviter toute dérive de pulvérisation sur les cultures et zones voisines. Ne pas laisser la bouillie dans la cuve du pulvérisateur pendant de longues périodes, par exemple le temps des repas.

Éviter les recroisements de pulvérisation.

CULTURES

Ne pas rouler ou herser les cultures dans les sept jours qui suivent une application de KINVARA.

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Sensibilité des mauvaises herbes

Le classement des mauvaises herbes dans le tableau suivant implique une bonne couverture de pulvérisation et de bonnes conditions de croissance.

Spectre d'activité sur les céréales :

Adventice		Sensibilité ¹
Arroche hastée	<i>Atriplex prostrata</i>	TS
Bleuet des champs	<i>Cyanus segetum</i>	TS
Bouton d'or	<i>Ranunculus repens</i>	S
Capselle bourse-à-pasteur	<i>Capsella bursa-pastoris</i>	TS
Chardon des champs	<i>Cirsium arvense</i>	S
Chénopode blanc	<i>Chenopodium album</i>	S
Chénopode hybride	<i>Chenopodium hybridum</i>	TS
Coquelicot	<i>Papaver rhoes</i>	MS
Datura officinale	<i>Datura stramonium</i>	MS
Delphinium ajacis L. Pied d'alouette	<i>Delphinium cossonianum</i>	S
Fumeterre des champs	<i>Fumaria agraria</i>	MS
Fumeterre officinal	<i>Fumaria officinalis</i>	S
Gaillet gratteron	<i>Galium aparine</i>	S
Galeopsis des champs	<i>Galeopsis intermedia</i>	TS
Galinsoga cilié	<i>Galinsoga quadriradiata</i>	MS
Géranium découpé	<i>Geranium dissectum</i>	TS
Sisymbrium sophia	<i>Descurainia sophia</i>	TS
Laiteron des champs	<i>Sonchus arvensis</i>	TS
Lamier amplexicaule	<i>Lamium amplexicaule</i>	MS
Lamier pourpre	<i>Lamium purpureum</i>	MS
Liseron des champs	<i>Convolvulus arvensis</i>	S
Matricaires	<i>Matricaria spp</i>	S
Morelle noire	<i>Solanum nigrum</i>	TS
Mouron des oiseaux	<i>Stellaria media</i>	S
Moutarde des champs	<i>Brassica sinapis</i>	TS
Myosotis des champs	<i>Myosotis arvensis</i>	S
Petite ciguë	<i>Aethusa cynapium</i>	TS
Petite ortie	<i>Urtica urens</i>	TS
Ravenelle	<i>Raphanus raphanistrum</i>	TS
Renoncule des marais	<i>Ranunculus philonotis</i>	S
Renouée des buissons	<i>Polygonum dumetorum</i>	MS
Renouées	<i>Polygonum spp</i>	S
Repousses de colza	-	TS
Séneçon commun	<i>Senecio vulgaris</i>	S
Spergule des champs	<i>Spergula arvensis</i>	TS
Véronique de Perse	<i>Veronica persica</i>	S
Violette des champs	<i>Viola arvensis</i>	MS

¹TS = très sensible (>95 %) ; S = sensible (85-94 %) ; MS = modérément sensible (70-84 %)

Spectre d'activité sur les prairies :

	Adventice	Sensibilité ¹
Mouron des oiseaux	<i>Stellaria media</i>	TS
Chardon des champs	<i>Cirsium arvense</i>	S
Lamier pourpre	<i>Lamium purpureum</i>	S
Bouton d'or	<i>Ranunculus repens</i>	MS
Patience sauvage	<i>Rumex obtusifolius</i>	S
Séneçon de Jacob	<i>Senecio jacobaea</i>	S
Pissenlit	<i>Taraxacum vulgare</i>	TS
Orties	<i>Urtica spp</i>	TS
Vesce à feuilles étroites	<i>Vicia sativa subsp. nigra</i>	TS

¹TS = très sensible (>95 %) ; S = sensible (85-94 %) ; MS = modérément sensible (70-84 %)

MESURES DE SÉCURITÉ

Il convient de rappeler que 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 complémentaires comme les protections individuelles.

En tout état de cause, 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.

PROTECTION DE L'OPÉRATEUR :

Éviter le contact du produit avec les yeux, la peau et les voies respiratoires.

Ne pas porter les gants ou tout autre objet souillé à la bouche.

Ne pas déboucher les buses du pulvérisateur en soufflant dessus.

Après application, rincer ses équipements de protection, jeter les gants avec les emballages vides (via une collecte organisée), se laver les mains au savon et prendre une douche.

Dans le cadre d'une application avec un pulvérisateur à rampe, l'opérateur doit porter :
 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

pendant l'application

Si application avec tracteur avec cabine fermée :

- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage d'au moins 230 g/m² avec traitement déperlant
- Gants en nitrile à usage unique certifiés EN 374-2, 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 d'au moins 230 g/m² avec traitement déperlant
- Gants en nitrile à usage unique certifiés EN 374-2, 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

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- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée

Travailleur

Dans les cas où le travailleur serait amené à intervenir sur les parcelles traitées, porter une combinaison de travail polyester 65%/coton 35% avec un grammage d'eau moins 230 g/m² avec traitement déperlant et des gants en nitrile certifiés EN 374-3.

PREMIERS SOINS

Enlever immédiatement les vêtements contaminés par le produit.

En cas de contact avec la peau: Laver abondamment à l'eau et au savon.

En cas d'inhalation: transporter la victime à l'extérieur et la maintenir au repos dans une position où elle peut confortablement respirer.

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.

En cas d'ingestion, ne PAS faire vomir. Appeler un médecin. Garder la victime au repos et la maintenir au chaud.

Dans tous les cas, si les symptômes persistent ou en cas de malaise, consulter un médecin et lui présenter l'étiquette et/ou la fiche de données de sécurité.

COMPATIBILITÉ

Les mélanges doivent être mis en œuvre conformément à la réglementation en vigueur et aux recommandations des guides de bonnes pratiques officiels.

CULTURES SUIVANTES

Respecter un délai de 4 mois entre l'application de KINVARA et le semis d'une nouvelle culture. De surcroît, mettre en œuvre les mesures nécessaires d'atténuation des risques, en l'occurrence s'assurer du bon compostage de la paille et de l'herbe coupée, afin d'éviter la présence de résidus de clopyralid dans les cultures alternées et/ou suivantes.

ENTRETIEN DU PULVERISATEUR

Les traces de substances résiduelles telles que le fluroxypyr dans la cuve peuvent abîmer les cultures sensibles. Après chaque jour d'utilisation de KINVARA, rincer abondamment le pulvérisateur à l'eau claire additionnée d'agent mouillant recommandé pour le nettoyage des pulvérisateurs. Veiller au rinçage complet de toutes les rampes et tuyaux.

STOCKAGE

Toujours conserver le produit dans son emballage d'origine. Le stocker dans un local réservé à cet usage, frais, sec, bien ventilé et fermant à clé, à l'abri du gel et de la chaleur.

EMBALLAGES VIDES ET SURPLUS DE TRAITEMENT

Éviter toute contamination de rivières, étangs et canaux d'irrigation avec le produit. Rincer les bidons, verser dans la cuve de pulvérisation et épandre les reliquats sur la parcelle traitée selon la réglementation en vigueur. Rendre inutilisables les emballages vides.

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

Ne pas réutiliser les emballages vides et les éliminer via une collecte organisée par les distributeurs partenaires de la filière Adivalor ou un autre service de collecte spécifique.

RÉSISTANCE

Il existe un risque général d'apparition de maladies résistantes aux herbicides. Afin de limiter ce risque, il convient de respecter les préconisations d'emploi de cette étiquette (dose, conditions d'application...) et, à chaque fois que c'est possible, de varier les substances chimiques et d'alterner avec des produits à mode d'action différent.

Le MCPA (acide phénol-carboxylique), le fluroxypyr et le clopyralid (acides pyridines-carboxyliques) appartiennent à la famille auxines synthétiques.

IMPORTANT

Respecter les usages, doses, conditions et précautions d'emploi mentionnés sur l'emballage qui ont été déterminés en fonction des caractéristiques du produit et des applications pour lesquelles il est préconisé. Conduire sur ces bases la culture et les traitements selon la bonne pratique agricole en tenant compte, sous votre responsabilité, de tous les facteurs particuliers concernant votre exploitation tels que la nature du sol, les conditions météorologiques, les méthodes culturelles, les variétés végétales, la résistance des espèces... Le fabricant garantit la qualité de ses produits vendus dans leur emballage d'origine, ainsi que leur conformité à l'autorisation de mise sur le marché délivrée par les autorités françaises compétentes. Compte tenu de la diversité des législations existantes, il est recommandé, dans le cas où les denrées issues des cultures protégées avec cette spécialité sont destinées à l'exportation, de vérifier la réglementation en vigueur dans le pays importateur.

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Appendix 3 Letter of Access

Provided upon request.

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