

REGISTRATION REPORT

Part A

Risk Management

Product code: COM 802 09 M RB

Product name(s): LIM'AGRO

Active Substance(s):

**15.5 g pure active/kg ferric phosphate dihydrated (12.5
g/kg ferric phosphate anhydrous)**

COUNTRY: FRANCE

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(renewal of authorisation (art. 43))

Applicant: COMPO France S.A.S.

Date: 2019-11-06

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PART A – Risk Management

The company COMPO France S.A.S. has requested renewal of the marketing authorisation in France for the product LIM'AGRO (product code: COM 802 09 M RB; marketing authorisation n° 2140252), containing 15.5 g pure active/kg ferric phosphate dihydrated (12.5 g anhydrous ferric phosphate/kg) for use as a molluscicide (non-professional use). Ferric Phosphate is a low risk active substance, therefore LIM'AGRO (COM 802 09 M RB) shall be authorized as a low risk plant protection product if compliant with article 47.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-7 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in Registration Report, Part B include assessment of further data or information as required at national registration by the EU peer review. It also includes assessment of data and information relating to LIM'AGRO (COM 802 09 M RB) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of LIM'AGRO (COM 802 09 M RB) have been made using endpoints agreed in the EU peer review(s) of ferric phosphate.

This document describes the specific conditions of use and labelling required for France for the registration of LIM'AGRO (COM 802 09 M RB).

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

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

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

1 DETAILS OF THE APPLICATION

1.1 Application background

The present registration report concerns the evaluation of COMPO France S.A.S.'s application to market LIM'AGRO (COM 802 09 M RB) in France as a molluscicide (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 renewal of authorisation after approval of the active substance of this product in France and in other MSs of the Southern zone.

1.2 Active substance approval

Ferric phosphate

Commission Implementing Regulation (EU) 2015/1166 of 15 July 2015 renewing the approval of the active substance ferric phosphate in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council concerning the placing of plant protection products on the market, and amending the Annex to Commission Implementing Regulation (EU) No 540/2011.

Specific provisions of Regulation (EU) No 2015/1166 were as follows:

For the implementation of the uniform principles, as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on ferric phosphate, and in particular Appendices I and II thereof, shall be taken into account.

The approval's expiry date was extended to 31 December 2030.

An EFSA conclusion is available (EFSA Journal 2015;13(1):3973).

A Review Report is available (List of information, tests and studies relied upon Version 2 (22 July 2015) and Final

review report, SANTE/10385/2015 Rev 1, 29 May 2015).

1.3 Regulatory approach

The present application (2016-1380 – renewal of authorisation; 2016-2738 and 2016-3440 – minor change in composition) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses) in the context of the zonal procedure for all Member States of the Southern zone, taking into account the worst-case uses (“risk envelope approach”)¹ – the highest application rates over the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

The French Order of 4th May 2017² provides that:

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

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

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

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

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

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

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

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

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

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

² Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs 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/AGRGI632554A/jo/texte>

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

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

⁵ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGRGI1407093A/jo>

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

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

1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of LIM'AGRO (COM 802 09 M RB), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

1.5 Letter(s) of Access

Not necessary: the applicant has provided equivalent studies to those essential for renewal of active substance via data matching table (DMT).

2 DETAILS OF THE AUTHORISATION

2.1 Product identity

Product name (code)	LIM'AGRO (COM 802 09 M RB)
Low risk product (article 47)	Yes
Authorisation number	2140252
Function	Molluscicide (non-professional use)
Applicant	COMPO France S.A.S.
Composition	15.5 g pure active/kg ferric phosphate dihydrated
Formulation type (code)	Ready to use bait (RB)
Packaging	<p>Cardboard box with a spout: 100 g ; 150 g ; 200 g ; 250 g ;300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg</p> <p>Cylindrical Cardboard box: 100 g ; 150 g ; 200 g ; 250 g ;300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg</p> <p>Cardboard box with inner refermable LDPE-bag and a pyramidal doser: 100 g ; 150 g ; 200 g ; 250 g ;300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg</p> <p>Paperboard box with inner refermable LDPE-bag: 100 g ; 150 g ; 200 g ; 250 g ;300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg</p> <p>HDPE box with a cap: 100 g ; 150 g ; 200 g ; 250 g ;300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g</p>

2.2 Classification and labelling

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

Physical hazards	-	
Health hazards	-	
Environmental hazards	-	
Hazard pictograms	-	
Signal word	-	
Hazard statements	-	-
	-	-
	-	-
Precautionary statements –	<i>For the P phrases, refer to the extant legislation</i>	
Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008)	-	-

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

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

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

	Do not discharge into the sink, gutter or any other water hole the non-used container leftovers.
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2.2.3 Other phrases linked to the preparation

Wear suitable personal protective equipment ⁷ : refer to the Decision in Appendix 1 for the details
Re-entry period ⁸ : Not applicable
Pre-harvest interval ⁹ : 1 day
Other mitigation measures: -
The label may include the following recommendations: -
The label must reflect the conditions of authorisation.

⁷ If a tractor with cab is used, wearing gloves during application is only required when working with the spray mixture

⁸ The legal basis for this is **Titre I Article 3** of the French Order of 4th May 2017 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]

⁹ According to the French Order of 4th May 2017, PHI cannot be lower than 3 days unless specifically stated in the assessment and decision.

2.3 Product uses

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

PPP (product name/code):	LIM'AGRO (COM 802 09 M RB)	Formulation type:	GAP rev. 1, date: 2019-11-06 RB ^(a, b)
Active substance 1:	Ferric phosphate dihydrated	Conc. of as 1:	15.5 g/kg ^(c)
Safener:	none	Conc. of safener:	- ^(c)
Synergist:	none	Conc. of synergist:	- ^(c)
Applicant:	COMPO France SAS	Professional use:	<input type="checkbox"/>
Zone(s):	southern ^(d)	Non professional use:	<input checked="" type="checkbox"/>
Verified by MS:	yes		
Field of use:	molluscicide		

1	2	3	4	5	6	7	8	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)	Conclusions (zRMS) Remarks (applicant):
					Method / Kind	Timing / Growth stage of crop & season	Max. number (min. interval between applications) a) per use b) per crop/ season	kg or L product / ha a) max. rate per appl. b) max. total rate per crop/season	g or kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		

1	2	3	4	5	6	7	8	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)	Conclusions (zRMS) Remarks (applicant):
					Method / Kind	Timing / Growth stage of crop & season	Max. number (min. interval between applications) a) per use b) per crop/ season	kg or L product / ha a) max. rate per appl. b) max. total rate per crop/season	g or kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
1	France	Vegetables	F	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	1	Acceptable Protection of emerging plants and reduction of leaf consumption.
2	France	Vegetables	G, I	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	1	Acceptable Protection of emerging plants and reduction of leaf consumption. On terrace and balcony treatment only in plant container.
3	France	Fresh herbs	F	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	1	Acceptable Protection of emerging plants and reduction of leaf consumption
5	France	Fruits (soft fruit,	F	Slugs	Spreading,	at beginning of	4 applications	a) 50 kg/ha	a) 625 g as/ha	n.a.	1	Acceptable

1	2	3	4	5	6	7	8	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)	Conclusions (zRMS) Remarks (applicant):
					Method / Kind	Timing / Growth stage of crop & season	Max. number (min. interval between applications) a) per use b) per crop/ season	kg or L product / ha a) max. rate per appl. b) max. total rate per crop/season	g or kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
		tree nuts, pome fruit, stone fruit)			uniformly broadcasted across cultivated area, only between plants, bait treatment	infestation	per year (1 day)	b) 200 kg/ha	b) 2500 g as/ha			
6	France	Fruits (soft fruit, tree nuts, pome fruit, stone fruit)	G, I	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	1	Acceptable On terrace and balcony treatment only in plant container.
7	France	Ornamentals	F	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	n.a.	Acceptable Protection of emerging plants and reduction of leaf consumption.
8	France	Ornamentals	G, I	Slugs	Spreading, uniformly broadcasted across cultivated area, only	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	n.a.	Acceptable Protection of emerging plants and reduction of

1	2	3	4	5	6	7	8	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)	Conclusions (zRMS) Remarks (applicant):
					Method / Kind	Timing / Growth stage of crop & season	Max. number (min. interval between applications) a) per use b) per crop/ season	kg or L product / ha a) max. rate per appl. b) max. total rate per crop/season	g or kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
					between plants, bait treatment							leaf consumption. On terrace and balcony treatment only in plant container.
9	France	Potatoes	F	Slugs	Spreading, uniformly broadcasted across cultivated area, only between plants, bait treatment	at beginning of infestation	4 applications per year (1 day)	a) 50 kg/ha b) 200 kg/ha	a) 625 g as/ha b) 2500 g as/ha	n.a.	1	Acceptable Protection of emerging plants and reduction of leaf consumption.

Remarks table heading:

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

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

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

3 RISK MANAGEMENT

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

3.1.1 Physical and chemical properties

LIM'AGRO (COM 802 09 M RB) is a ready to use bait formulation (RB). All studies have been performed in accordance with the current requirements and the results are deemed to be acceptable. The appearance of the product is a solid formulation with a light-bluish green colour and a characteristic odour. It is not explosive and has no oxidising properties. The product is not flammable. It has a self-ignition temperature of 409°C. In aqueous solution (1%), it has a pH value of 7.45 at 20°C. There is no effect of high temperature on the stability of the formulation, since after 14 days at 54°C, neither the active ingredient content nor the technical properties were changed. The stability data indicate a shelf life of at least 2 years at ambient temperature when stored in commercial packaging (carton with and without PE inside). Its technical characteristics are acceptable for a RB formulation.

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

3.1.2 Methods of analysis

3.1.2.1 Analytical method for the formulation

Analytical methods for the determination of the active substance and the relevant impurities in the formulation are available and validated. **Nevertheless, an analytical method for the specific determination of Fe³⁺ in the formulation is required in post-registration.**

3.1.2.2 Analytical methods for residues

No residues have to be monitored in crops and foodstuff of animal origin, as well as in soil, water and air. As a consequence, no analytical methods are proposed.

The active substance is neither toxic nor very toxic hence no analytical method is required for the determination of residues in biological fluids and tissues.

3.1.3 Mammalian Toxicology

Endpoints used in risk assessment

Active Substance: Ferric phosphate		
ADI	0.8 mg kg bw/d	EU (January 2016)
ARfD	Not applicable	
AOEL	0.4 mg/kg bw/d	
Dermal absorption	No relevant dermal absorption of FePO4 is expected (extremely low solubility in water and lipids). The oral absorption is an active energy dependent process which will not take place in the skin. A dermal absorption value of 10% is proposed as worst-case scenario. (EFSA 2015)	
		Concentrate (used in formulation) 15.5 g/kg dihydrated ferric phosphate)
	Dermal absorption endpoints %	10

3.1.3.1 Acute Toxicity

COM 802 09 M RB (LIM'AGRO) containing 15.5 g/kg ferric phosphate dihydrated has a low toxicity in respect to acute oral and dermal toxicity and is not irritating to the rabbit skin or eye and is not a skin sensitizer. Toxicity by inhalation is not expected as the formulation type of the product is granules. Moreover, the product is considered not dusty.

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

3.1.3.2 Operator Exposure

Summary of critical use patterns (worst cases):

Crop	F/G ¹⁰	Equipment	Application rate kg product/ha g product/10m ² (g as/ha g as/10m ²)	Spray dilution (L/ha)	Model
Vegetables, fresh herbs, fruits, ornamentals, potatoes*	F/G	Manual	50 kg /ha 50 g /10m ² (0.625 kg sa/ha)	NA	UPJ

*All crops for field, indoor or greenhouse use (potatoes: field use only)

Considering proposed uses, operator systemic exposure was estimated using the French study 2005 dedicated to amateur use:

Crop	Equipment	PPE and/or working coverall	% AOEL ferric phosphate
Vegetables, fresh herbs, fruits, ornamentals, potatoes*	Manual (F/G)	No PPE	4

*All crops for field, indoor or greenhouse use (potatoes: field use only)

According to the model calculations, it can be concluded that the risk for the operator using LIM'AGRO (COM 802 09 M RB) is acceptable without PPE.

The proposed packaging has been described in sufficient detail, and their compliance with the provisions of French regulation relating to the use of plant protection products by non-professional users can therefore be finalized.

3.1.3.3 Bystander Exposure

In the context of use by non-professionals, it is considered that the assessment for bystanders is covered by that for the operator.

3.1.3.4 Worker Exposure

COM 802 09 M RB (LIM'AGRO) is intended to be used by amateurs during home garden application.

As the worker is also the user of the product, it is considered that the assessment for workers is covered by the operator exposure assessment.

¹⁰ Open field or glasshouse

3.1.3.5 Resident Exposure

3.1.4 Residues and Consumer Exposure

3.1.4.1 Residues

In the framework of EU evaluation no residue definition has been proposed for ferric phosphate (EFSA, 2015). Furthermore ferric phosphate is included in Annex IV of Regulation (CE) No 396/2005 that groups active substances for which no MRL are necessary.

3.1.4.2 Consumer exposure

Indeed ferric phosphate is naturally present in soils where its availability to plants is slow, linked to the fact that it is strongly adsorbed to soil constituents, and is poorly soluble in water. It disappears slowly, and degradation products (iron and phosphates) are natural nutritive compounds, necessary for plants to insure their growth.

Moreover, ferric phosphate is used as food additive, and, has been considered as a « generally considered as safe » substance in the United States of America.

Last, considering the formulation as « granular baits », product is not applied directly to consumable parts of plants and if eventually present on the crop surface it will be easily removed by normal food processing e.g. washing.

For all these reasons consumer is not exposed to a specific risk considering intended uses of COM 802 09 M RB (LIM'AGRO) and no risk mitigation measure is deemed necessary to insure consumer safety.

All intended uses are then considered acceptable, and a PHI is not necessary for the intended uses on all edible crops under evaluation.

3.1.5 Environmental fate and behaviour

The fate and behaviour in the environment of the formulation has been evaluated according to the requirements of Regulation (EC) No 1107/2009. Ferric phosphate is a low-risk active substance. Appropriate endpoints from the EU review were used to calculate PECs for the active substance for the intended use patterns. The risk assessment for greenhouses uses is covered by the one provided for the outdoor uses.

Due to the natural occurrence in the environment of ferric phosphate and its dissociation products (iron ions and phosphate ions), no specific study to address the fate and behavior of active substance in environment is needed.

The PEC of ferric phosphate in soil has been assessed according to FOCUS guidance documents, with standard FOCUS recommendations. The results for PEC_{SOIL} for ferric phosphate are used for the eco-toxicological risk assessment.

Given the very low water solubility, the low soil mobility of ferric phosphate and the intended uses (home and garden uses; granular application), no PEC_{SW} were required.

For home and garden uses, no PEC_{GW} were required according to EU conclusions (EFSA, 2015). According to the guidance document SANCO221/2000¹¹, iron ions and phosphate ions are considered as compounds of no-concern. Given the very low water solubility and the low soil mobility of ferric phosphate, no unacceptable risk of groundwater contamination is expected for the intended uses.

As ferric phosphate is a non-volatile salt, no significant contamination of the air compartment is expected for the intended uses.

¹¹ Guidance document on the assessment of the relevance of metabolites in groundwater of substances regulated under Council directive 91/414/EEC. Sanco/221/2000-rev.10-final, 25 February 2003.

Implications for labelling resulting from environmental fate assessment: none.

3.1.6 Ecotoxicology

The ecotoxicological risk assessment of the formulation was performed according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review for active substance and preparation 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.

For home and garden uses of granular products, an ecotoxicological risk assessment is only considered relevant for terrestrial vertebrates. For aquatic organisms, the exposure is considered to be negligible, therefore, a risk assessment is not deemed necessary. For terrestrial vertebrates, the risk is considered acceptable for the intended uses.

Others phrases in compliance with Regulation (EC) No 547/2011:

Do not discharge into the sink, gutter or any other water hole the non-used container leftovers.

3.1.7 Efficacy

Considering the first registration of LIM'AGRO (COM 802 09 M RB) data and the new data submitted:

- the level of efficacy of LIM'AGRO (COM 802 09 M RB) when applied at the claimed dose of 50 kg/ha on several species of slugs on different crops is considered as satisfactory.
- the risk of negative impact on yield, quality, propagation, succeeding crops, adjacent crops is considered as negligible.
- the risk of resistance development or appearance to phosphate ferric is considered as very low.

3.2 Conclusions arising from French assessment

Taking into account the above assessment, **an authorisation can be granted** as proposed in Appendix 1 – Copy of the product Decision.

3.3 Substances of concern for national monitoring

No information stated.

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

3.4.1 Post-authorisation monitoring

No further information is required.

3.4.2 Post-authorisation data requirements

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

- An analytical method for the specific determination of Fe^{3+} in the formulation.

3.4.3 Label amendments

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

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

Appendix 1 – Copy of the French Decision



Décision relative à une demande de renouvellement de l'autorisation de mise sur le marché d'un produit phytopharmaceutique et des demandes associées

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 de renouvellement de l'autorisation de mise sur le marché, suite au renouvellement de l'approbation de la substance active phosphate ferrique, et des demandes associées du produit phytopharmaceutique LIM'AGRO

de la société COMPO FRANCE SAS

enregistrées sous les n°2016-1380, n°2016-2738 et n°2016-3440

Vu les conclusions de l'évaluation de l'Anses du 29 novembre 2018,

Vu la décision du Directeur général de l'Anses du 9 janvier 2019,

Vu le recours gracieux formé le 28 février 2019 par la société COMPO FRANCE SAS,

Vu les éléments complémentaires transmis par la direction en charge de l'évaluation des produits réglementés de l'Anses le 23 septembre 2019,

L'autorisation de mise sur le marché du produit phytopharmaceutique désigné ci-après **est renouvelée** en France, en intégrant la nouvelle composition, pour les usages et dans les conditions précisés dans la présente décision et ses annexes.

La présente décision abroge et remplace la décision du 9 janvier 2019 et s'applique sans préjudice des autres dispositions applicables.

Avertissement :

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



Informations générales sur le produit	
Noms du produit	LIM'AGRO STOP NET LIMACES
Type de produit	Produit de référence
Titulaire	COMPO FRANCE SAS Zone Industrielle 25220 ROCHE LEZ-BEAUPRE France
Formulation	Appât (prêt à l'emploi) (RB)
Contenant	15,5 g/kg - phosphate ferrique dihydraté (équivalent à 12,5 g/kg de phosphate ferrique)
Numéro d'intrant	2140460
Numéro d'AMM	2140252
Fonction	Molluscicide
Gamme d'usage	Amateur / emploi autorisé dans les jardins
Mention particulière	Produit à faible risque au sens de l'article 47 du règlement (CE) 1107/2009

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 décembre 2031.

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

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

A Maisons-Alfort le, 06 NOV. 2019

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

LIM'AGRO
AMM n°2140252

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ANNEXE I : Modalités d'autorisation du produit

Vente et distribution	
Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages :	
Emballage	Contenance
Boîtes en carton avec bec verseur	100 g ; 150 g ; 200 g ; 250 g ; 300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg
Boîtes en carton cylindrique	100 g ; 150 g ; 200 g ; 250 g ; 300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg
Boîtes en carton avec sac en polyéthylène basse densité refermable, avec doseur pyramidal	100 g ; 150 g ; 200 g ; 250 g ; 300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg
Boîtes en carton avec sac en polyéthylène basse densité refermable	100 g ; 150 g ; 200 g ; 250 g ; 300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ; 850 g ; 900 g ; 950g ; 1 kg ; 1,1 kg ; 1,2 kg ; 1,3 kg ; 1,4 kg ; 1,5 kg ; 1,6 kg ; 1,7 kg ; 1,8 kg ; 1,9 kg ; 2 kg ; 2,1 kg ; 2,2kg ; 2,3 kg ; 2,4 kg ; 2,5 kg ; 5 kg
Boîtes en polyéthylène haute densité avec bouchon	100 g ; 150 g ; 200 g ; 250 g ; 300 g ; 350 g ; 400 g ; 450 g ; 500 g ; 550 g ; 600 g ; 650 g ; 700 g ; 750 g ; 800 g ;

Les autres emballages sont refusés car ils ne permettent pas de garantir une exposition minimale de l'utilisateur non professionnel.

Classification du produit
La classification retenue est la suivante : Sans classement.
Pour les phrases P se référer à la réglementation en vigueur.
Le titulaire de l'autorisation est responsable de la mise à jour de la fiche de données de sécurité et de la classification du produit en tenant compte de ses éventuelles évolutions.



Liste des usages autorisés

En l'absence de mention spécifique, les usages autorisés correspondent à une utilisation en plein champ.

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles
11012903 Traitements généraux* Trt Sol* Limaces et escargots	5 g/m ²	4/an	-	1	-	-	-
Également autorisé sous abri. Application dès le début de l'infestation.							

LIM'AGRO
AMM n°2140252

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Conditions d'emploi du produit

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

- Non applicable.

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

Protection de l'eau

- Ne pas rejeter dans l'évier, le caniveau ou tout autre point d'eau les fonds de bidon non utilisés.

Exigences complémentaires post-autorisation

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

Détail de la demande post autorisation	Date limite	Récurrence (mois)
Fournir une méthode de détermination spécifique du Fe^{3+} dans le produit.	01/09/2021	-

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

Anti-Limaces Loches & Escargots

Lim'Agro®

Lim'Agro® est un nouvel agent anti-limaces contenant un principe actif : le phosphate ferrique, composé minéral présent naturellement dans le sol. Il permet de lutter efficacement contre toutes les espèces de limaces, loches et escargots qui envahissent vos potagers, serres, pelouses et massifs ornementaux.

Activés par l'apport des limaces, les limaces cessent de se nourrir après l'avoir consommé. Les grandes arénicoles agissent comme « capot-éliminateur » tout en bloquant le système de navigation. Les limaces se retirent et meurent dans leur abri évitant de laisser des traces métronomiques de mucus et sans que l'on ait besoin de ramasser les cadavres. De ce fait, les limaces mortes ne peuvent être mangées par les hérissons et les animaux domestiques.

AVANTAGES

- Une longue durée, dans le sol, le principe actif des granules non consommés est métabolisé par les micro-organismes en fer et en phosphate qui servent d'éléments nutritifs pour les plantes.
- La formulation permet de ne pas être préjudiciable aux animaux domestiques, hérissons, oiseaux et aussi vers de terre, abeilles et arthropodes utiles.
- Les granules sont résistants à la pluie et peu gras pour ne gêner ni le développement de moisissures.
- Équivalent à une action longue durée.
- Efficace aussi bien par temps humide que par temps sec et ne nécessitant pas d'être arrosé en cas de sécheresse.
- Pas de danger d'absorption pour l'animal.
- Utilisable en agriculture biologique (conformément au règlement CE n° 834/2007).
- Le produit bénéficie d'une technologie éprouvée dans le domaine des apports, issue des recherches menées par AlgoFlash.

MODE D'EMPLOI

Légende	Fruits	Plantes d'ornement
Granules	Limaces, loches et escargots	
Période d'emploi	Avant le début de la saison ou au début de la saison	
Dose d'emploi	20 g/m² soit environ 20 à 25 granules maximum à appliquer par m²	
Applications	Appliquez directement sur les légumes à protéger	Appliquez directement sur les plantes d'ornement

CONSEILS D'UTILISATION

- Porter des gants et une tenue de protection appropriée.
- Avant de traiter, égaler la surface du sol pour éviter que les granules ne disparaissent dans des poches ouverts.
- Égaler de manière homogène les granules entre les allées ou les rangs des cultures, tout en évitant l'application sur les allées.
- Préférer un traitement préventif. Il est recommandé de traiter rapidement dès l'apparition des premiers dégâts.
- L'apport des granules Anti-Limaces Lim'Agro® doit être effectué de préférence le matin, en fin d'après-midi ou au début de soirée, après une pluie ou un arrosage.
- Ne pas faire des tas avec les granules.
- En cas d'intensité grave, traiter également les cultures voisines où les limaces pourraient trouver refuge.
- Appliquer juste après la plantation si les limaces apparaissent déjà.
- En cas de forte infestation, les granules agiront pendant une semaine à deux semaines. Pénètre dans immédiatement un sous-sol, cela assure également une élimination de nouvelles générations de limaces.
- En cas de sol très sec, il est recommandé d'arroser légèrement le sol au préalable, ce qui rend les granules plus agréables pour les limaces.
- Ne faire saupoudrer les rangs après manipulation.
- Conserver uniquement dans l'emballage d'origine. Ne pas utiliser l'emballage vide.
- Maximum 4 traitements par culture et par an.
- Il n'y a pas de délai avant récolte.

PRATIQUE
DOSEUR INTÉGRÉ

SANITISABLE
REFERMABLE
EFFICACE PRÉVENTIF

PÉRIODE D'EMPLOI

J E M A S J J A S O N D

☐ Utilisation ciblée
☐ Utilisation possible
☐ Utilisation déconseillée

N° de lot / Date de fabrication : voir l'emballage.

ALGOFLASH
www.algoflash.fr

MAISE NETTE : 1000g
BIOLIMA1000A

3 167770 211214

159487

3 167770 211214

ALGOFLASH Naturesol

UTILISABLE EN AGRICULTURE BIOLOGIQUE**

Anti-Limaces Loches & Escargots

Granulés à base de phosphate ferrique

Anti-Limaces Loches & Escargots
Lim'Agro®

Granulés à base de phosphate ferrique

1000 g

****Conformément au règlement (CE) N° 834/2007**

Protège légumes, fruits, fleurs aux moisissures
Action rapide et longue durée
Ne cause pas de traces visibles de mucus

1000 g

****Conformément au règlement (CE) N° 834/2007**

Remarque :
N° d'avis : 2140252
Détenteur de l'avis : COMPO France SAS
21 - 25220 ROCHEFORT-DE-MEUR
Emploi autorisé dans les jardins.
Sans classement.

Composition : 12,5 g/kg (1,25 % (m/m)) de Phosphate ferrique.

Formulation : Agent granule prêt à l'emploi - Molécule.

Usages : Traitements généraux - Traitement du sol - Limaces et escargots.

Dose d'emploi : 5 g/m²
Nombre max. d'applications par an : 4
Appel en cas d'urgence : 15 ou centre anti-poison.

Lim'Agro®

P101 En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette.
P201 Tenir hors de portée des enfants.
P202 Ne pas manger, boire ou fumer en manipulant ce produit.
P273 Éviter le rejet dans l'environnement.
P501+P510 EN CAS D'URGENCE : appeler immédiatement un CENTRE ANTI-POISON ou un médecin.
P501 Éliminer le contenu / récipient dans une déchetterie ou par un organisme agréé.
E001 Respecter les instructions d'utilisation pour éviter les risques pour la santé humaine et l'environnement.
S01 Ne pas utiliser l'eau avec le produit ou son emballage.
Distribué par COMPO France SAS
Division Grand Public
21 - 25220 ROCHEFORT-DE-MEUR
Tél : 03 81 82 25 25

data-pack consulting
159487-818 326 FR-2014-BIOLIMA1000A-also

Printed: 355.500 X 419.500 mm Date: jeudi 19 février 2015

SONDAGE

Données collectées pour le sondage :

Données : 159487-818 326 FR-2014-BIOLIMA1000A-also

Printed: 355.500 X 419.500 mm Date: jeudi 19 février 2015

159487

3 167770 211214

Appendix 3 – Letter(s) of Access

Not applicable.