

## **REGISTRATION REPORT**

### **Part A**

### **Risk Management**

**Product code: Bordeauxmix 124 SC**

**Product name: LIMPIC 124SC**

**Active substance:**

**copper (Bordeaux mixture), 124 g/L**

**COUNTRY: FRANCE**

**Southern Zone**

**Zonal Rapporteur Member State: France**

**NATIONAL ASSESSMENT FRANCE**

**(new application)**

**Applicant: SAPEC AGRO S.A.**

**Date: 2018/11/05 (Decision)**

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## **PART A – Risk Management**

The company SAPEC AGRO S.A. has requested marketing authorisation in France for the product LIMPIC 124SC (product code: Bordeauxmix 124 SC), containing 124 g/L copper (in the form of Bordeaux mixture), for use as a fungicide.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-7 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in Registration Report, Part B include assessment of further data or information as required at national registration by the EU peer review. It also includes assessment of data and information relating to LIMPIC 124SC (Bordeauxmix 124 SC) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of LIMPIC 124SC (Bordeauxmix 124 SC) have been made using endpoints agreed in the EU peer review(s) of copper.

This document describes the specific conditions of use and labelling required for France for the registration of LIMPIC 124SC (Bordeauxmix 124 SC).

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 SAPEC AGRO S.A.'s application to market LIMPIC 124SC (Bordeauxmix 124 SC) in France as a fungicide (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the first authorisation of this product in France and in other MSs of the Southern zone.

#### **1.2 Active substance approval**

##### **Copper compounds (Bordeaux mixture)**

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

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

##### **PART A**

Only uses as bactericide and fungicide may be authorised.

##### **PART B**

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

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

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

— the specification of the technical material as commercially manufactured which must be confirmed and

supported by appropriate analytical data. The test material used in the toxicity dossiers should be compared and verified against this specification of the technical material,

- the operator and worker safety and ensure that conditions of use prescribe the application of adequate personal protective equipment where appropriate,
- the protection of water and non-target organisms. In relation to these identified risks risk mitigation measures, such as buffer zones, should be applied where appropriate,
- the amount of active substance applied and ensure that the authorised amounts, in terms of rates and number of applications, are the minimum necessary to achieve the desired effects and do not cause any unacceptable effect on the environment taking into account background levels of copper at the application site.

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

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

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

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

A Review Report is available (SANCO/150/08 final, 26 May 2009, modified 10 October 2014).

### 1.3 Regulatory approach

The present applications (2013-0639 [new application] and 2015-0697 [second trade name]) were evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses)<sup>1</sup> 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”)<sup>2</sup> – the highest application rates over the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

The French Order of 4 May 2017<sup>3</sup> 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

<sup>1</sup> French Food Safety Agency, Afssa, before 1 July 2010

<sup>2</sup> 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

<sup>3</sup> 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>

compliance with Regulation (EC) no 1107/2009<sup>4</sup>, 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 546/2011<sup>5</sup>, and are expressed as “acceptable” or “not acceptable”. in accordance with those criteria.

Finally, the French Order of 26 March 2014<sup>6</sup> 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 extrapolation<sup>7</sup> is to supply “minor” crops with registered plant protection products.

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

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

#### 1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of LIMPIC 124SC (Bordeauxmix 124 SC), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

#### 1.5 Letter(s) of Access

The applicant has provided letter(s) of access.

## 2 DETAILS OF THE AUTHORISATION

### 2.1 Product identity

<b>Product name (code)</b>	LIMPIC 124SC (Bordeauxmix 124 SC)
<b>Authorisation number</b>	2180671
<b>Function</b>	Fungicide
<b>Applicant</b>	SAPEC AGRO S.A.
<b>Composition</b>	124 g/L copper (in the form of Bordeaux mixture)
<b>Formulation type (code)</b>	Suspension concentrate (SC)
<b>Packaging</b>	Bottle HDPE (1 L, 5 L, 20 L) Bottle HDPE/EVOH (1 L)

<sup>4</sup> 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

<sup>5</sup> 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

<sup>6</sup> <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGRG1407093A/jo>

<sup>7</sup> SANCO document “guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/ 7525/VI/95 - rev.9

## 2.2 Classification and labelling

### 2.2.1 Classification and labelling in accordance with Regulation (EC) No 1272/2008

<b>Physical hazards</b>	-	
<b>Health hazards</b>	Sensitisation — Skin, Hazard Category 1	
<b>Environmental hazards</b>	Hazardous to the aquatic environment — Acute Hazard, Category 1 Hazardous to the aquatic environment — Chronic Hazard, Category 1	
<b>Hazard pictograms</b>		
<b>Signal word</b>	Warning	
<b>Hazard statements</b>	H317	May cause an allergic skin reaction.
	H400	Very toxic to aquatic life.
	H410	Very toxic to aquatic life with long-lasting effects.
<b>Precautionary statements –</b>	<i>For the P phrases, refer to the extant legislation</i>	
<b>Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008)</b>	-	Contains 1,2-benzisothiazol-3(2H)-one.

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

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

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

SP 1	Do not contaminate water with the product or its container (Do not clean application equipment near surface water/Avoid contamination via drains from farmyards and roads).
SPe 1	To protect soil organisms, do not apply this product or any other product containing copper at an annual dose higher than 4 kg Cu/ha.
SPe 3	To protect aquatic organisms, respect an unsprayed buffer zone of 50 metres <sup>8</sup> and a planted buffer strip of 20 metres to adjacent surface water bodies for four applications per year at 744 g Cu/ha in vineyards.

### 2.2.3 Other phrases linked to the preparation

Wear suitable personal protective equipment <sup>9</sup> : refer to the Decision in Appendix 1 for the details.
Re-entry period <sup>10</sup> : 48 hours.
Pre-harvest interval <sup>11</sup> : 21 days.
The label must reflect the conditions of authorisation.

<sup>8</sup> The legal basis for this is **Titre III Article 12** 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]

<sup>9</sup> If a tractor with cab is used, wearing gloves during application is only required when working with the spray mixture

<sup>10</sup> 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]

<sup>11</sup> 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

GAP rev. 1, date: 2018/11/05

PPP (product name/code): **LIMPIC 124SC / Bordeauxmix 124 SC**  
Active substance 1: copper (Bordeaux mixture)  
Applicant: **SAPEC AGRO S.A.**  
Zone(s): southern <sup>(d)</sup>  
Verified by MS: yes  
Field of use: fungicide

Formulation type: **SC** <sup>(a, b)</sup>  
Conc. of a.s. 1: **124 g/L** <sup>(c)</sup>  
Professional use:   
Non-professional use:

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use- No. <sup>(e)</sup>	Member state(s)	Crop and/ or situation  (crop destination / purpose of crop)	F, Fn, Fpn G, Gp	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 <sup>(f)</sup>
					Method / Kind	Timing / Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	L product/ha a) max. rate per appl. b) max. total rate per crop/season	g a.s./ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha  min / max		
<b>Zonal uses (field or outdoor uses, certain types of protected crops)</b>													
1	FR	Grape	F	<i>Plasmopara viticola</i>	Foliar spray	BBCH 13-57 & 69-81	4	7-10	a) 6 b) 24	a) 744 b) 2976	100/ 1000	21	<b>Acceptable</b>

**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

**Remarks columns:**  
1 Numeration necessary to allow references  
2 Use official codes/nomenclatures of EU Member States  
3 For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure)  
4 F: professional field use, Fn: non-professional field use, Fpn: professional and non-professional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application  
5 Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named.  
6 Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.

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

### 3 RISK MANAGEMENT

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

##### 3.1.1 Physical and chemical properties

LIMPIC 124SC (Bordeauxmix 124 SC) is a suspension concentrate (SC). All studies have been performed in accordance with the current requirements and the results are deemed acceptable. The appearance of the product is a blue liquid, with an uncharacteristic odour. The formulation is not explosive, has no oxidising properties and is not flammable. It has a self-ignition temperature of 380 °C. In aqueous solution (1 %), it has a pH value of 8.0 at ambient 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 substance content nor the technical properties were changed. The shelf life study of at least two years at ambient temperature has not been provided and is required post-authorisation. The technical characteristics are acceptable for an SC 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 copper in the formulation are available and validated.

No analytical method for the determination of the relevant impurities (lead, arsenic, cadmium) in the active substance Bordeaux mixture have been submitted; this is required.

###### 3.1.2.2 Analytical methods for residues

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

##### 3.1.3 Mammalian Toxicology

#### Endpoints used in risk assessment

Active substance: <b>copper (Bordeaux mixture)</b>			
ADI	0.15 mg/kg bw/d	EU (2009)	
ARfD	Not applicable		
AOEL	0.072 mg/kg bw/d		
Dermal absorption	Based on <i>in vitro</i> human studies performed on several formulations containing copper in different forms *:		
		Concentrate (tested)	Diluted formulation (tested) 0.3 g Cu/L
	<i>In vitro</i> (human) %	1	9
		Concentrate (used in formulation) 124 g/L	Spray dilution (used in formulation) 0.74 g/L
	<b>Dermal absorption endpoints %</b>	<b>1</b>	<b>9</b>

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

### 3.1.3.1 Acute Toxicity

LIMPIC 124SC (Bordeauxmix 124 SC) containing 124 g/L of copper (in the form of Bordeaux mixture) has a low acute oral, inhalational and dermal toxicity. The product is not irritating to the rabbit skin or eye, but is a skin sensitiser.

The classification proposed in accordance with Regulation (EC) No 1272/2008 is shown in Section 2.2.1.

### 3.1.3.2 Operator Exposure

Summary of critical use patterns (worst cases):

Crop	F/G <sup>12</sup>	Equipment	Application rate kg/L product/ha (g a.s./ha)	Spray dilution (L/ha)	Model
Grapes	F	Tractor-mounted/trailed broadcast air-assisted sprayer	6 L/ha (744 g Cu/ha)	100-1000	German Model

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

Crop	Equipment	PPE and/or working coverall	% AOEL copper
Grapes	Tractor-mounted/trailed broadcast air-assisted sprayer	Working coverall and gloves during mixing/loading and application	26

According to the model calculations, it may be concluded that the risk for the operator using LIMPIC 124SC (Bordeauxmix 124 SC) is acceptable with a working coverall (90 % protection factor) and gloves during mixing/loading and application.

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

### 3.1.3.3 Bystander Exposure

Bystander exposure was assessed according to EUROPOEM II. Exposure is estimated to be 6.5 % of the AOEL of copper.

It may be concluded that there is no unacceptable risk to the bystander after incidental short-term exposure to LIMPIC 124SC (Bordeauxmix 124 SC).

### 3.1.3.4 Worker Exposure

Workers may have to enter treated areas after treatment for crop inspection/harvesting activities. Therefore, estimation of worker exposure was calculated according to EUROPOEM II. Exposure is estimated to be 56 % of the AOEL of copper.

It may be concluded that without taking into account a re-entry period, there is no unacceptable risk anticipated for workers wearing a working coverall and gloves, when re-entering crops treated with LIMPIC 124SC (Bordeauxmix 124 SC).

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

<sup>12</sup> Open field or glasshouse

### 3.1.4 Residues and Consumer Exposure

The data available are considered sufficient for risk assessment. Any exceedence of the current MRL of 50 mg/kg for copper in wine and table grapes as laid down in Reg (EU) 396/2005 is not expected.

The chronic intake of copper residues is unlikely to present a public health concern. An ARfD was not deemed necessary.

As far as consumer health protection is concerned, France agrees with the authorisation of the intended use.

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

**Data gaps:** None.

**Data required post-authorisation:** None.

#### Summary of the evaluation

##### Summary for copper:

Crop	Plant metabolism covered?	Sufficient residue trials?	PHI sufficiently supported?	Sample storage covered by stability data?	MRL compliance Reg 149/2008	Chronic risk for consumers identified?	Acute risk for consumers identified?	Comments
Wine and table grapes	Yes	Yes	Yes	Yes	Yes	No	NA	

Since copper is a mineral compound, there is no need to investigate the effects of industrial and/or household processing on the nature of the residue. Data on effects of processing on the amount of residue have been submitted, and processing factors have been defined and considered to refine the consumer risk assessment.

Considering dietary burden and based on the intended uses, no modification of the intake is expected for livestock.

Residues in succeeding crops have not been investigated. However, copper occurs naturally in soils. Copper can be used applied as fertiliser, and is also added to soil when spreading sewage sludge, animal manure and urban compost as part of normal agricultural practice. Finally, copper is a contact fungicide/bactericide. As a result, studies for residues in succeeding crops are not relevant.

Chronic consumer exposure resulting from copper background in all food commodities and from water was calculated according to EFSA PRIMo (rev2) model. Considering the uses of copper as plant protection products, chronic exposure remains acceptable for all groups of consumers (maximum 77.54 % ADI for WHO cluster B).

##### Summary for LIMPIC 124SC (Bordeauxmix 124 SC):

Crop	PHI for LIMPIC 124SC Bordeauxmix 124 SC):requested by applicant	PHI/withholding period* sufficiently supported for	PHI for LIMPIC 124 SC):proposed by zRMS	zRMS Comments (if different PHI proposed)
		Copper		
Wine and table grapes	21 days	Yes	21 days	-

\* Purpose of withholding period to be specified

**Waiting periods before planting succeeding crops:** Not relevant.

### 3.1.5 Environmental fate and behaviour

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

The PEC values for copper in soil and surface water have been assessed using the endpoints established in the EU review or agreed in the assessment based on new data provided. PEC<sub>soil</sub> and PEC<sub>sw</sub> values derived for the active substance are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

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

Based on compound properties, no significant contamination of the air compartment is expected for the intended uses.

### 3.1.6 Ecotoxicology

The risk assessment of the formulation LIMPIC 124SC (Bordeauxmix 124 SC) was performed according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU review for active substance were used for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

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

For aquatic organisms, mitigation measures are needed to reduce entry via spray drift and runoff. Indeed, for these organisms, the risks are acceptable when a 50 metres no-spray buffer zone including a planted buffer strip of 20 metres is applied for four applications per year at 744 g Cu/ha in vineyards.

Concerning soil macro-organisms, the potential long-term risk of the product is based on the latest EFSA conclusions (2013) in which a Regulatory Acceptable Concentration (RAC) of 4 kg/ha per year was set based on a field study. The risk to soil macro-organisms can then be considered acceptable at the maximum annual rate of 4 kg Cu/ha/year. Thus, even if the annual rate of copper for the intended use of LIMPIC 124SC (Bordeauxmix 124 SC) is less than 4 kg Cu/ha/year, the mitigation measure (to not apply more than 4 kg Cu/ha/year) has to be indicated on the label as this applies to copper whatever the preparation used on the vineyards.

### 3.1.7 Efficacy

Considering the data submitted:

- The efficacy level of LIMPIC 124SC (Bordeauxmix 124 SC) is considered satisfactory for the requested use.
- The phytotoxicity level of LIMPIC 124SC (Bordeauxmix 124 SC) is considered acceptable for the requested use.
- The risks of negative impact on yield, propagation and adjacent crops are considered acceptable. Copper can cause visual damage on grape berries and can alter the wine-making process and wine quality. However, these risks of negative impact are considered acceptable.
- The risk of resistance developing or appearing to copper does not require monitoring for the requested use.

### **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 the following confirmatory pieces of information at the next re-authorisation of the product after renewal of copper's approval:

- Two-year shelf life study at ambient temperature;
- A suspensibility test done at the maximum concentration (1.5 % v/v);
- Evidence showing that the preparation remains homogeneous when applied through appropriate application equipment;
- Analytical methodology for the determination of the relevant impurities (lead, arsenic, cadmium) and copper in the active substance Bordeaux mixture.

#### **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 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 et les demandes associées du produit phytopharmaceutique **LIMPIC 124 SC***

*de la société SAPEC AGRO France*

*enregistrées sous les n°2013-0639, 2015-0841 et 2015-0697*

*Vu les conclusions de l'évaluation de l'Anses du 16 octobre 2018,*

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

La présente décision 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	LIMPIC 124 SC SULFOPEC CUIVRE 124 S
Type de produit	Produit de référence
Titulaire	SAPEC AGRO France 2/12 Chemin des Femmes Immeuble l'Odysée -A-3 91300 MASSY France
Formulation	Suspension concentrée (SC)
Contenant	124 g/L – cuivre (sous forme de bouillie bordelaise)
Numéro d'intrant	9881-2013.01
Numéro d'AMM	2180671
Fonction	Fongicide
Gamme d'usage	Professionnel

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 janvier 2020.

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,

05 NOV. 2018

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



## ANNEXE I : Modalités d'autorisation du produit

<b>Vente et distribution</b>	
Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages :	
<b>Emballage</b>	<b>Contenance</b>
Bouteilles en polyéthylène haute densité	1 L
Bidons en polyéthylène haute densité	5 L ; 20 L

<b>Classification du produit</b>	
La classification retenue est la suivante :	
<b>Catégorie de danger</b>	<b>Mention de danger</b>
Sensibilisants cutanés - Catégorie 1B	H317 : Peut provoquer une allergie cutanée
Dangers pour le milieu aquatique - Danger aigu, catégorie 1	H400 : Très toxique pour les organismes aquatiques
Dangers pour le milieu aquatique - Danger chronique, catégorie 1	H410 : Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme
Pour les phrases P se référer à la réglementation en vigueur.	
<b>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.</b>	



**Liste des usages autorisés**  
En l'absence de restriction, les usages sont autorisés sur l'ensemble des cultures de la portée de l'usage.

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles	
12703203 Vigne*Trt.Part.Aer.* Midiou(s)	6 L/ha	4/an	entre les stades BBCH 13- 57	F (BBCH 57)	50 (dont DVP 20)	-	-	-	
	Intervalle minimum entre les applications : 7 jours 4 applications par an et par culture								
	6 L/ha	4/an	entre les stades BBCH 69- 81	21	50 (dont DVP 20)	-	-	-	
	Intervalle minimum entre les applications : 7 jours 4 applications par an et par culture								

DVP : Dispositif Végétalisé Permanent.

LIMPIC 124 SC  
AMM n°2180671

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## Conditions d'emploi du produit

### **Protection de l'opérateur et du travailleur**

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

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

### **Pour l'opérateur, porter**

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

#### **• pendant le mélange/chargement**

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/ coton 35 % avec un grammage de 230 g/m<sup>2</sup> 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*

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

*Si application avec tracteur sans cabine*

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

#### **• pendant le nettoyage du matériel de pulvérisation**

- Gants en nitrile certifiés EN 374-3 ;
- Combinaison de travail en polyester 65 %/ coton 35 % avec un grammage de 230 g/m<sup>2</sup> 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.

### **Pour le travailleur, porter**

- Une combinaison de travail (cotte en coton/polyester 35 % / 65% - grammage d'au moins 230 g/m<sup>2</sup>) avec traitement déperlant et, en cas de contact avec la culture traitée, des gants en nitrile certifiés EN 374-3.

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

- 48 heures.

### **Respect des limites maximales de résidus (LMR)**

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



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

#### ***Protection de l'eau***

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

#### ***Protection de la faune***

- SPe 1 : Pour protéger les organismes du sol, ne pas appliquer ce produit ou tout autre produit contenant du cuivre à une dose annuelle totale supérieure à 4 kg Cu/ha.

- SPe 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 50 mètres comportant un dispositif végétalisé permanent non traité d'une largeur de 20 mètres en bordure des points d'eau, pour 4 applications par an à la dose de 744 g Cu/ha.

### **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.

<b>Détail de la demande post autorisation</b>	<b>Délai (mois)</b>	<b>Récurrence (mois)</b>
Fournir les résultats de l'étude en cours de réalisation, concernant la stabilité au stockage pendant 2 ans, à température ambiante.	24	–
Fournir la détermination de la suspensibilité à la concentration maximale.	24	–
Fournir la preuve que le produit reste homogène pendant l'application dans les conditions appropriées d'utilisation.	24	–
Fournir une méthode validée pour la détermination des impuretés pertinentes (plomb, cadmium, arsenic) et du cuivre (bouillie bordelaise) dans le produit.	24	–

### **Recommandations relatives à l'étiquette du produit**

Il est recommandé de faire figurer l'information suivante sur l'étiquette :

- Contient de la 1,2-benzisothiazol-3(2H)-one.

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

## BORDEAUXMIX 124 SC

### FONGICIDE CONTRE LE MILDIOU DE LA VIGNE

Suspension concentrée (SC) contenant 124 g/L de cuivre sous forme de  
bouillie bordelaise

AMM n° xxxx  
SAPEC AGRO S.A.



Xi – Irritant



N – Dangereux pour l'environnement

Classification selon la directive 67/548/EEC ou 1999/45/CE :

R43 - Peut entraîner une sensibilisation par contact avec la peau

R50/53 – Très toxique pour les organismes aquatiques, peut entraîner des effets néfastes à long terme pour l'environnement aquatique

S1/2 Conserver sous clef et hors de portée des enfants

S20 Ne pas manger et ne pas boire pendant l'utilisation

S29 Ne pas jeter les résidus à l'égout

S35 Ne se débarrasser de ce produit et de son récipient qu'en prenant toutes précautions d'usage.

S37 Porter des gants appropriés

S46 En cas d'ingestion, consulter immédiatement un médecin et lui montrer l'emballage ou l'étiquette

S57 Utiliser un récipient approprié pour éviter toute contamination du milieu ambiant.

SP1 – Ne pas polluer l'eau avec le produit ou son emballage

Bien lire l'étiquette avant toute utilisation et respecter les précautions d'emploi.

Respecter les instructions d'utilisation pour éviter les risques pour l'homme et l'environnement.

Délai de rentrée sur la parcelle: 48 heures.

Fiche de Données de Sécurité disponible sur : [www.quickfds.com](http://www.quickfds.com)

En cas d'urgence, appeler le 15 ou le centre antipoison de Paris : 01 40 05 48 48. Puis signalez vos symptômes au réseau Phyt'attitude, n° vert 0 800 887 887 (appel gratuit depuis un poste fixe).

AMM n° xxxx

Conditionnement : xxxxxxx

Lot N°: xxxx

Détenteur de l'homologation:

SAPEC Agro S.A.

Avenida do Rio Tejo

Herdade das Praias

2910-440 SETÚBAL

Portugal

Tél : +35 1 218 969 223

## PRESENTATION ET MODE D'ACTION

BORDEAUXMIX 124 SC est un fongicide contenant 124 g/L de cuivre (sous forme de bouillie bordelaise).

C'est un fongicide de contact à action préventive. Les ions cuivre présents sur les cultures traitées sont absorbés passivement par les spores des champignons et bactéries lorsqu'elles grandissent, et s'y accumulent jusqu'au moment où leur concentration devient létale pour les cellules. Le cuivre est plus actif contre les spores que contre les mycéliums des champignons.

L'activité fongicide et bactériostatique est due aux ions cuivreux (Cu<sup>2+</sup>) libérés dans l'eau. Ils se combinent avec divers groupements chimiques des protéines des cellules ou de la membrane et induisent des dénaturations de protéines et systèmes enzymatiques. Il s'agit d'une activité multi-site, qui rend la sélection de souches mutantes résistantes très improbable.

### Usages et doses autorisés :

Traitement préventif anti-mildiou, sélectif des principaux cépages de vigne (raisin de table et de cuve).

CULTURE	USAGE	DOSE	Nombre maximum d'application	Délai avant récolte (DAR)	Largeur de zone non traitée (ZNT)
Vigne	Mildiou	6 L/ha	4 applications par an	21 jours	-

Les limites maximales de résidus sont consultables à l'adresse suivante:

<http://e-phy.agriculture.gouv.fr>

## MODE D'EMPLOI

L'application de BORDEAUXMIX 124 SC se fait par pulvérisation après dilution dans l'eau, sur l'ensemble des parties de la plante à traiter (feuilles et grappes).

### Préparation de la bouillie :

Remplir la cuve à 1/2 d'eau, mettre sous agitation. Verser la quantité de BORDEAUXMIX 124 SC nécessaire puis compléter le remplissage.

Veiller à une répartition homogène de la bouillie sur l'ensemble de la végétation à traiter.

Laisser l'agitateur en fonctionnement pendant le trajet et jusqu'à la fin de la pulvérisation.

## MELANGES

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

Consulter le site : <http://e-phy.agriculture.gouv.fr>

Ne pas mélanger à des composés alcalins

## RECOMMANDATIONS D'EMPLOI

### ✓ Cultures et époque d'application :

L'application de BORDEAUXMIX 124 SC s'effectue préventivement pendant les périodes de grande sensibilité de la vigne au mildiou, au début du printemps du stade 13 (3 feuilles étalées) au stade 57 (inflorescences complètement développées, fleurs séparées), et du stade 69 (fin de la floraison) au stade 81 (début véraison).

Application durant la floraison est proscrite.

Une cadence de 7 à 10 jours est recommandée.

### ✓ Nombre d'applications :

2 à 3 applications à une cadence de 7 à 10 jours peuvent être réalisées, en fonction de la pression et des conditions de l'infection.

Sur une même culture, il est nécessaire de ne pas appliquer plus de 4 applications par an.

✓ **Dose et volume de bouillie :**

Appliquer BORDEAUXMIX 124 SC après dilution à 6 litre par hectare (volume allant de 100 à 1000 L/ha).

S'assurer de bien répartir le produit sur toute la surface de la végétation à traiter, avec un pulvérisateur bien réglé. Il est recommandé de traiter chaque face des rangs de vigne.

✓ **Effets non intentionnels vis-à-vis des auxiliaires et limitation du phénomène de résistance :**

Des précautions sont à observer afin d'éviter tout risque de phytotoxicité des composés à base de cuivre, et plus spécialement sur les parcelles froides et humides.

## PRECAUTIONS D'EMPLOI

✓ **Pour le stockage :**

- Conserver le produit dans son emballage d'origine, dans des locaux fermés à clé, à l'écart de tout aliment et boisson y compris ceux pour les animaux, et hors de portée des enfants.

- Température minimale de stockage : -5°C.

✓ **Pour l'emploi :**

- Ne pas traiter à moins de cinq mètres d'un point d'eau temporaire ou permanent.

- Rincer les emballages vides et verser l'eau de rinçage dans la cuve du pulvérisateur.

- Eliminer les fonds de cuve conformément à la réglementation en vigueur.

- Après traitement, rincer le pulvérisateur à l'eau claire.

- Ne pas déverser les reliquats de produits et les eaux de rinçage dans les fossés, mares, cours d'eau ou égouts.

✓ **Pour l'élimination du produit et de l'emballage :**

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

- Eliminer les emballages vides rendus inutilisables via une collecte organisée par un service de collecte spécifique.

- Ne pas réutiliser l'emballage

### IMPORTANT:

Respectez 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. Conduisez sur ces bases la culture et les traitements selon la bonne pratique agricole, en tenant compte, sous votre responsabilité, de tous facteurs particuliers concernant votre exploitation, tels que la nature du sol, les conditions météorologiques, les méthodes culturales, 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 vente du Ministère de l'Agriculture. 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.

**Appendix 3 – Letter(s) of Access**

Provided upon request.