

# **REGISTRATION REPORT**

## **Part A**

### **Risk Management**

**Product code: F3441**

**Product name(s): METAREX DUO**

**Chemical active substance(s):**

**Ferric phosphate, 16.2 g/kg**

**Metaldehyde, 10.0 g/kg**

**Southern Zone**

**Zonal Rapporteur Member State: France**

**NATIONAL ASSESSMENT FRANCE**

**(New application)**

**Applicant: DE SANGOSSE S.A.S.**

**Date: 03/04/2019**

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## PART A

# RISK MANAGEMENT

### 1 Details of the application

The company DE SANGOSSE S.A.S. has requested marketing authorisation in France for the product METAREX DUO (formulation code: F3441), containing 10.0g/kg metaldehyde and 16.2g/kg ferric phosphate for use as a molluscicide for professional uses.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-10 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 METAREX DUO (F3441) where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of METAREX DUO (F3441) have been made using endpoints agreed in the EU peer reviews of metaldehyde and ferric phosphate.

This document describes the specific conditions of use and labelling required for France for the registration of METAREX DUO (F3441).

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

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

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

Appendix 4 of this document is the list of data considered for national authorisation

#### 1.1 Application background

The present registration report concerns the evaluation of DE SANGOSSE S.A.S.'s application to market METAREX DUO (F3441) 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 first authorisation of this product in France and in other MSs of the Southern zone.

The present application (2016-3885) 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”)<sup>1</sup> – the highest application rates over the Southern Zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

<sup>1</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>2</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.

No 546/2011<sup>3</sup>, and are expressed as “acceptable” or “not acceptable” in accordance with those criteria.

## 1.2 Letters of Access

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

The applicant has provided letter(s) of access for metaldehyde.

## 1.3 Justification for submission of tests and studies

According to the applicant:

« In accordance with Article 33 3(d): The test and study reports submitted with this application are necessary to support an evaluation and a decision according to Uniform Principles for first authorization of the new product METAREX DUO (F3441). Duplication of tests has been avoided, but tests are required to fully evaluate the physical, chemical and technical properties of the formulated product, for the determination of active substances in the formulated product, for the toxicological and ecotoxicological evaluation of the product, and to confirm residues in treated crops. Justification for conducting new vertebrate studies is provided in the relevant section of the dossier. ».

## 1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of METAREX DUO (F3441), 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	F3441
Product name in MS	METAREX DUO
Authorisation number	2190173
Low risk (article 47)	No
Function	Molluscicide
Applicant	DE SANGOSSE S.A.S.
Active substance(s) (incl. content)	Metaldehyde, 16.2g/kg Ferric phosphate, 10.0g/kg
Formulation type	Bait (ready for use) [RB]
Packaging	HDPE (1 kg) Carton (1 kg) Paper (4 kg, 5 kg, 10 kg, 15 kg, 20 kg) Polypropylène big-bags (300 kg, 400 kg, 500 kg, 1000 kg)

<sup>3</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.

	Professional user
Coformulants of concern for national authorisations	-
Restrictions related to identity	-
Mandatory tank mixtures	None
Recommended tank mixtures	None

## 2.2 Conclusion

The evaluation of the application for METAREX DUO (F3441) resulted in the decision **to grant** the authorization.

## 2.3 Substances of concern for national monitoring

Refer to 5.1.1.

## 2.4 Classification and labelling

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

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

Hazard class(es), categories:	-
Hazard pictograms:	-
Signal word:	-
Hazard statement(s):	-
Precautionary statement(s):	<i>For the P phrases, refer to the extant legislation</i>

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

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

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.
	For other restrictions refer to 2.5

### 2.4.3 Other phrases (according to Article 65 (3) of the Regulation (EU) No 1107/2009)

None.

## 2.5 Risk management

According to the French law and procedures, specific conditions of use are set out in the Decision letter. The French Order of 4th May 2017<sup>4</sup> provides that:

- unless formally stated in the product authorisation, the pre harvest interval (PHI) is at least 3 days;
- unless formally stated in the product authorisation, the minimum buffer zone alongside a water body is 5 metres;
- unless formally 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, drift buffer zones may be reduced under some circumstances as explained in appendix 3 of the above-mentioned French Order.

Finally, the French Order of 26 March 2014<sup>5</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>6</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.

### 2.5.1 Restrictions linked to the PPP

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

Operator protection:	
-	refer to the Decision in Appendix 1 for the details
Worker protection:	
-	refer to the Decision in Appendix 1 for the details
Integrated pest management (IPM)/sustainable use:	
	-
Environmental protection	
SPe 6	To protect birds and wild mammals remove spillages.
Other specific restrictions	
Re-entry period	Not applicable

<sup>4</sup> 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. <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGR1632554A/jo/texte>.

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

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

Storage	The formulation must be stored in a room where temperature remains below 40°C.
	For citrus, stone fruit, kiwi, banana, tomato, pepper: Use application material or agricultural practices to avoid contact of fruit with the active substance and with soil treated with the active substance.

### **2.5.2 Specific restrictions linked to the intended uses**

Some of the authorised uses are linked to the following conditions in addition to those listed under point 2.5.1 (mandatory labelling):

None.

## 2.6 Intended uses (only NATIONAL GAP)

**Please note:** The GAP Table below reports the intended uses proposed by the applicant, evaluated and concluded as safe uses by France as zRMS. Those uses are then granted in France. When the conclusion is "not acceptable" the intended use is highlighted in grey and the main reason(s) reported in the remarks.

GAP rev. 1, date: 2019-04-03

PPP (product name/code):	METAREX DUO (F3441)	Formulation type:	RB (a, b)
Active substance 1:	Metaldehyde	Conc. of as 1:	10.0 g/kg <sup>(c)</sup>
Active substance 2:	Ferric phosphate	Conc. of as 2:	16.2 g/kg <sup>(c)</sup>
Applicant:	DE SANGOSSE S.A.S.	Professional use:	<input checked="" type="checkbox"/>
Zone(s):	southern <sup>(d)</sup>	Non professional use:	<input type="checkbox"/>
Verified by MS:	Yes		
Field of use:	Molluscicide		

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, 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  <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)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	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	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, 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 <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)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	kg as/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	Citrus fruit Tree nuts	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
2	FR	Pome fruit	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
2	FR	Stone fruit	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
3	FR	Table & wine grapes	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -69	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
4	FR	Strawberry	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -69	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
5	FR	Cane fruit, Other small fruit & berries	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -69	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
6	FR	Kiwi fruits, Bananas	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -64	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
7	FR	Potatoes	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -97	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
8	FR	Other root & tuber vegetables (Beetroot, Carrots, Celeriac, Horseradish, Jerusalem artichokes, Parsnips, Parsley root, Radishes, Salsify, Swede, Turnip, Others)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -97	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
9	FR	Bulb onions, Garlic, Shallots	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -49	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable

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, 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 <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)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
10	FR	Tomatoes, Aubergines	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
11	FR	Peppers, Okra	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
12	FR	Cucumbers, Gherkins, Courgettes, Others	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Not acceptable (MRL)
13	FR	Pumpkins	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
14	FR	Melons, Watermelons, Others	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -89	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
15	FR	Sweetcorn	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Not acceptable (MRL)
16	FR	Cauliflower, Broccoli, Head cabbage	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> - Before BBCH41 <sup>2</sup>	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
17	FR	Brussels sprouts	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -47	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	21	Acceptable
18	FR	Lettuce & other salad plants, Spinach & similar (leaves), Herbs	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> - Before BBCH41 <sup>2</sup>	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
19	FR	Legume vegetables (fresh)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable except beans with pod and peas with pod (not acceptable MRL)
20	FR	Asparagus	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -32	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
21	FR	Globe artichoke	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -51	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Not acceptable (MRL)

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, 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 <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)	kg product / ha a) max. rate per appl. b) max. total rate per crop/season	kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		
22	FR	Leeks	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -49	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	7	Acceptable
23	FR	Pulses (dry)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
24	FR	Oilseeds (except Peanuts)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -17	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
25	FR	Cereals (Wheat, Barley, Oats, Rye, Triticale)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -29	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
26	FR	Maize	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
27	FR	Millet, Sorghum	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
28	FR	Sugar beet, Fodder beet Chicory root	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	F	Acceptable
29	FR	New pasture (ryegrass)	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -15	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	49	Not acceptable (MRL)
30	FR	Turf	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -99	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	N/a	Acceptable
31	FR	Ornamental species and cut flower production	F	Slugs/Snails	BC	BBCH00 <sup>1</sup> -99	5	5	a) 5.0 b) 25.0	a) 0.081/0.050 b) 0.405/0.250	-	N/a	Acceptable

§ Application type: BC = Broadcast

Equipment: All crops; tractor-drawn applicator, hand-held applicator, or application by hand

<sup>1</sup> Includes application from 14d before sowing/planting

<sup>2</sup> Before BBCH41; before heads begin to form, before lateral buds begin to develop (Brussels sprouts), or when rosette development is completed (Spinach, loosehead lettuce)

<b>Remarks table heading:</b>	(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.
<b>Remarks columns:</b>	1 Numeration necessary to allow references. 2 Use official codes/nomenclatures of EU Member States. 3 For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure). 4 F: professional field use, Fn: non-professional field use, Fpn: professional and non-professional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application. 5 Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named. 6 Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.	7 Growth stage at first and last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application. 8 The maximum number of application possible under practical conditions of use must be provided. 9 Minimum interval (in days) between applications of the same product. 10 For specific uses other specifications might be possible, e.g.: g/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 Background of authorisation decision and risk management**

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

METAREX DUO (F3441) is a ready to use bait (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 bleu granule. It is not explosive and has no oxidising properties. The product is not flammable, and shows no self-heating properties. In aqueous solution (1%), it has a pH value of 4.6 at 20°C. There is no effect of high temperature on the stability of the formulation, since after 56 days at 40°C; neither the active ingredient content nor the technical properties were changed.

To update the dossier, results of the ambient shelf life study should be provided in post-authorisation.

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

The formulation must be stored in a room where temperature remains below 40°C.

#### **3.2 Efficacy (Part B, Section 3)**

Considering the data submitted:

- the efficacy of METAREX DUO (F3441) when it is applied at the claimed dose of 5kg/ha against slugs and snails are considered as satisfactory for all the claimed uses.
- the selectivity level of METAREX DUO (F3441) is considered as negligible for all the claimed uses.
- the risk of negative impact (yield, quality, transformation processes, propagation, succeeding crops, adjacent crops) is considered as negligible.
- the risk of resistance development or appearance is considered as very low.

Restrictions: /

Resistance monitoring data: /

Post-authorization data: /

#### **3.3 Methods of analysis (Part B, Section 5)**

Analytical methods for the determination of the active substances metaldehyde and ferric phosphate and the relevant impurities (acetaldehyde for metaldehyde and lead, cadmium, mercury for ferric phosphate) in the formulation are available and validated.

To control formulations on the market, a method to determine specifically the Fe3+ in the formulation METAREX DUO (F3441) is required in post-registration.

Analytical methods are available in the Draft Assessment Report/this dossier and validated for the determination of residues of metaldehyde in plants (all group except no group), food of animal origin, soil, water (surface and drinking) and air.

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

### 3.4 Mammalian toxicology (Part B, Section 6)

Endpoints used in risk assessment:

Active Substance: metaldehyde		
ADI	0.02 mg/kg body weight/day	
ARfD	0.3 mg/kg body weight	EU (March 2011)
AOEL	0.1 mg/kg body weight/day	
Dermal absorption	Based on default values according to guidance on dermal absorption (Efsa 2012): 75%	
Oral absorption	100%	

Active Substance: ferric phosphate		
ADI	0.8 mg/kg body weight/day	
ARfD	Not required	EU (January 2016)
AOEL	0.4 mg/kg body weight/day	
Dermal absorption	A dermal absorption value of 10% is proposed as worst-case scenario (EFSA, 2015 <sup>7</sup> ).	
Oral absorption	50% oral bioavailability	

#### 3.4.1 Acute toxicity

F3441 containing 10g/kg of metaldehyde and 16.2g/kg of ferric phosphate has a low toxicity in respect to acute oral, inhalation and dermal toxicity and is not irritating to the rabbit skin or eye and is not a skin sensitisier.

#### 3.4.2 Operator exposure

Summary of critical use patterns (worst cases):

Crop type	F/G <sup>8</sup>	Equipment <i>Application method</i>	Maximum application rate kg as /ha	Minimum volume water (L/ha)
All crops	F	Broadcast application of granules Vehicle mounted Manual (Hand-held equipment)	5 kg product/ha (0.081 kg ferric phosphate/ha, 0.05 kg metaldehyde/ha)	n.a.

Considering proposed uses, operator systemic exposure was estimated using the EFSA model<sup>9</sup>:

Crop	Equipment	PPE and/or working coverall	% AOEL metaldehyde	% AOEL ferric phosphate
All crops	Vehicle mounted	Working coverall and gloves during mixing/loading and application	1.6 %	0.2 %
All crops	Manual (Hand- held equipment)	Working coverall and gloves during mixing/loading and application	61 %	1.3 %

According to the model calculations, it can be concluded that the risk for the operator using F3441 is acceptable with a working coverall and gloves during mixing/loading and application.

<sup>7</sup> EFSA Journal 2015;13(1):3973.

<sup>8</sup> Open field or glasshouse.

<sup>9</sup> AOEM – Agricultural Operator Exposure Model (EFSA Journal 2014:12 (10):3874).

### 3.4.3 Worker exposure

Broadcast application of granules and manual application is intended for METAREX DUO (F3441), no work is expected to be practiced after application. Therefore, worker exposure estimation is considered not relevant.

### 3.4.4 Bystander and resident exposure

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.*”

METAREX DUO (F3441) is a granular bait formulation; no drift is expected. Therefore, bystander exposure estimation is considered negligible.

Broadcast application of granules and manual application is intended for METAREX DUO (F3441); no drift is expected. Therefore, residential exposure estimation is considered negligible.

Residential exposure was assessed according to EFSA model. An acceptable risk was determined for residents (adult and child):

Active substances	Model (AOEM) – (Manual worst-case) - Population	% of systemic AOEL Vapour (75th percentile)	% of systemic AOEL Surface deposits (75th percentile)
Metaldehyde	Resident (adult)	1.07 %	0.28 %
	Resident (children)	0.23 %	0.11 %
Ferric phosphate	Resident (adult)	0.27 %	0.01 %
	Resident (children)	0.06 %	0.00 %

### 3.4.5 Combined exposure

A cumulative assessment for operators and bystanders has been performed. At the first tier, combined exposure is calculated as the sum of the component exposures without regard to the mode of action or mechanism/target of toxicity.

Hazard quotients (HQ) for each active substance and the hazard index (HI: sum of hazard quotients) are:

Application scenario	Equipment (worst-case)	PPE	Active ingredient	Estimated exposure / AOEL (HQ)
Operators	Manual (Hand-held equipment)	Working coverall and gloves during mixing/loading and application	Metaldehyde	0.61
			Ferric phosphate	0.01
		<b>Cumulative risk operators (HI)</b>		<b>0.62</b>
Residents (child)	-	-	Metaldehyde	<0.01
			Ferric phosphate	<0.01

		<b>Cumulative risk residents (HI)</b>		<b>&lt;0.02</b>
Residents (adult)	-	-	Metaldehyde	<0.01
			Ferric phosphate	<0.01
		<b>Cumulative risk residents (HI)</b>		<b>&lt;0.02</b>

The Hazard Index is < 1. Thus combined exposure to all active substances in METAREX DUO (F3441) is not expected to present a risk for operators or bystanders. No further refinement of the assessment is required.

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

#### Overall conclusion

The data available are considered sufficient for risk assessment. An exceedance of the current MRLs for metaldehyde as laid down in Reg. (EU) 396/2005 is not expected.

However, intended uses on pome fruit, potatoes, other roots and tuber vegetables (except rutabaga), tomato, aubergines and sweet corn, are not sufficiently supported by available data to demonstrate a no-residue situation. Hence, the intended uses are not acceptable.

Moreover, concerning intended uses on courgette, cucumbers, gherkins, fresh peas and beans with pods, globe artichokes and pasture (animal feed), the compliance with in force MRL could not be demonstrate because of insufficient residue trials.

The intended use on rutabaga is not acceptable due to an MRL exceedance.

The chronic and the short-term intakes of metaldehyde residues resulting from the acceptable uses retained in the framework of this application are unlikely to present a public health concern.

As far as consumer health protection is concerned, France, zRMS agrees with the authorization of the retained uses sufficiently supported.

#### Mitigation measures

For citrus, stone fruit, kiwi, banana tomato, pepper; “Use application material or agricultural practices to avoid contact of fruit with the active substance and with soil treated with the active substance”.

#### Data gaps

As required in EFSA’s opinion on the review of MRLs, a hydrolysis study investigating the effect of sterilisation on the nature of residues of metaldehyde should be submitted to the RMS. However, according to the applicant, a new study has been submitted to the central zone RMS (Austria), evaluation is not yet available (April 2018).

#### Summary for METAREX DUO (F3441)

Crop	PHI for METAREX DUO (F3441) proposed by applicant	PHI/ Withholding period* sufficiently supported for	PHI for METAREX DUO (F3441) proposed by zRMS	zRMS Comments (if different PHI proposed)
		methaldehyde		
Citrus fruit	BBCH89, PHI=7 days	Yes		Use application material or agricultural practices to avoid fruits contact with active substance or with soil treated with active substance

Crop	PHI for METAREX DUO (F3441) proposed by applicant	PHI/ Withholding period* sufficiently supported for	PHI for METAREX DUO (F3441) proposed by zRMS	zRMS Comments (if different PHI proposed)
		methaldehyde		
Tree nuts	BBCH89, PHI=7 days			/
Pome fruit	BBCH89, PHI=7 days			/
Stone fruit	BBCH89, PHI=7 days			Plum: Use application material or agricultural practices to avoid fruits contact with active substance or with soil treated with active substance
Table & wine grapes	BBCH69, PHI=/		BBCH69, PHI=F	/
Strawberry	BBCH69, PHI=/		BBCH69, PHI=F	/
Cane fruit, other small fruit & berries	BBCH69, PHI=/		BBCH69, PHI=F	/
Kiwi fruit Banana	BBCH69, PHI=/		BBCH69, PHI=F	Use application material or agricultural practices to avoid fruits contact with active substance or with soil treated with active substance
Potatoes	BBCH97, PHI=7			
Other root&tuber vegetables (Beet-root, carrots, celeriac, Horseradish, Jerusalem artichoke, =s Parsnips, Parsley root, radishes, Salsify, Swede, Turnip, Others)	BBCH97, PHI=7			
Bulb onion, garlic, shallots	BBCH 49, PHI=7			
Tomatoes, Aubergines	BBCH 89, PHI=7			Application on soil around crops
Peppers, Okra	BBCH 89, PHI=7			Application on soil around crops
Pumpkins	BBCH 89, PHI=7 days			
Melons, watermelons, others	BBCH 89, PHI=7 days			
sweetcorn	BBCH 15, PHI=/		BBCH 15, PHI=F	
Cauliflower, broccoli, head cabbage	BBCH 41, PHI=/		BBCH 41, PHI=F	
Brussels sprout	BBCH 47, PHI=21			
Lettuce and other sala plants, Spinaches similar (leaves) Herbs	BBCH 41 PHI=/		BBCH 41 PHI=F	
Legume vegetable (fresh)	BBCH 15 PHI=/		BBCH 15 PHI=F	
Asparagus	BBCH 32 PHI=7			

Crop	PHI for METAREX DUO (F3441) proposed by applicant	PHI/ Withholding period* sufficiently supported for	PHI for METAREX DUO (F3441) proposed by zRMS	zRMS Comments (if different PHI proposed)
		methaldehyde		
Leeks	BBCH 49 PHI=7 days			
Pulses (dry)	BBCH 15 PHI=7 days			
Oilseeds (except peanuts)	BBCH 17 PHI=/		BBCH 17 PHI=F	
Cereals (wheat, barley, oats, rye, triticale)	BBCH 29 PHI=/		BBCH 29 PHI=F	
Maize	BBCH 15 PHI=/		BBCH 15 PHI=F	
Millet Sorghum	BBCH 15 PHI=/		BBCH 15 PHI=/	
Sugarbeet, fodder beet, chicory root	BBCH 15 PHI=/		BBCH 15 PHI=F	

NR: not relevant

\* Purpose of withholding period to be specified

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

#### Waiting periods before planting succeeding crops

Not relevant.

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

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

The PEC of metaldehyde and its metabolite 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 review or agreed in the assessment based on new data provided.

PEC<sub>SOIL</sub> and PEC<sub>SW</sub> derived for the active substance and its metabolite are used for the eco-toxicological risk assessment.

PEC<sub>GW</sub> for metaldehyde do not exceed the trigger of 0.1 $\mu$ g/L. Therefore, no unacceptable risk of groundwater contamination is expected for the intended 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 behaviour 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 and is used for the ecotoxicological risk assessment.

The PEC of ferric phosphate in surface water was estimated as worst-case from its solubility in water. It is used for the ecotoxicological risk assessment.

No unacceptable risk of groundwater contamination by ferric phosphate is expected for the intended uses.

Based on vapour pressure, information on volatilisation from plants and soil, and DT<sub>50</sub> calculation of both substances, no significant contamination of the air compartment is expected for the intended uses.

### **3.7 Ecotoxicology (Part B, Section 9)**

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

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

For birds and mammals, the Spe 6 sentence “To protect birds and wild mammals remove spillages” is considered required.

In addition, the two following data have to be provided in post- registrations for the product METAREX DUO (F3441):

- A biomonitoring of the acute effects on birds and mammals and,
- In accordance with the EU conclusion for phosphate ferric, as a direct entry of granules into water systems cannot be ruled out, a toxicity assay study of the effects of the active substance or the formulated product METAREX DUO (F3441) on aquatic gastropods should be provided to address the risk for these organisms. Such study is not present in the current dossier and should be provided in post-authorization. However, as this demand as already been done for other products containing ferric phosphate from the same applicant, it has been considered by zRMS that it is not necessary to also require the corresponding study in post authorization for this preparation. This conclusion is also supported by the fact that this preparation contained also the active substance methaldehyde (assumed to be more toxic to organisms than phosphate ferric) for which available toxicity data on mollusks indicate no toxicity for these organisms.

### **3.8 Relevance of metabolites (Part B, Section 10)**

Not relevant.

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

The actives substances is not approved as a candidate of 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”.

### 5.1.1 Post-authorisation monitoring

None.

### **5.1.2 Post-authorisation data requirements**

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

- Results of the ambient shelf life study;
- To control formulations on the market, a method to determine specifically the  $Fe^{3+}$  in the formulation METAREX DUO (F3441);
- A biomonitoring of the acute effects on birds and mammals;

## 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 et les demandes associées du produit phytopharmaceutique **METAREX DUO***

*de la société* DE SANGOSSE

*enregistrées sous les n°2016-3885, 2017-0195, 2018-1043 et 2018-3936*

*Vu les conclusions de l'évaluation de l'Anses du 27 novembre 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.



<b>Informations générales sur le produit</b>	
<b>Noms du produit</b>	METAREX DUO HELEXIOM DUO
<b>Type de produit</b>	Produit de référence
<b>Titulaire</b>	DE SANGOSSE Bonnel CS 10005 47480 Pont du Casse France
<b>Formulation</b>	Appât (prêt à l'emploi) (RB)
Contenant	16,2 g/kg - phosphate ferrique 10 g/kg - métaldéhyde
<b>Numéro d'intrant</b>	964-2016.01
<b>Numéro d'AMM</b>	2190173
<b>Fonction</b>	Molluscicide
<b>Gamme d'usage</b>	Professionnel

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active qui arrivera à échéance le plus tôt. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 mai 2024.

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,

03 AVR. 2019

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



## ANNEXE I : Modalités d'autorisation du produit

### Vente et distribution

Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages :

Emballage	Contenance
Boites en carton	1 kg
Seaux en polyéthylène haute densité	1 kg
Sacs en papier	4 kg ; 5 kg ; 10 kg ; 15 kg ; 20 kg
Big-bags en polypropylène	300 kg ; 400 kg ; 500 kg ; 1000 kg

### 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.

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
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 89	7	-	-	-	-
Uniquement sur pamplemoussier, orange, citronnier, limettes, mandarinier, amandier, châtaignier, noisetier, noyer, noix du Brésil, noix de cajou, noix de coco, noix de pécan, pignon, pistache, abricotier, cerisier, pêcher, prunier, "melon".								
L'usage est également autorisé sous abri sur "melon".								
L'usage est uniquement autorisé sous abri sur "tomate", "poivron" et "concombre".								
Intervalle minimum entre les applications : 5 jours.								
<b>11012903</b> Traitements généraux* Trit Sol*Limaces et escargots	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 99	-	Non applicable	-	-	-
Uniquement sur "gazon" et "cultures florales et ornementales".								
L'usage est également autorisé sous abri sur "cultures florales et ornementales".								
Intervalle minimum entre les applications : 5 jours.								
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 64	<b>F</b> (BBCH 64)	-	-	-	-
Uniquement sur "kiwi" et "bananier".								
Intervalle minimum entre les applications : 5 jours.								



### Liste des usages autorisés

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

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 49	7	-	-	-	-
Uniquement sur "oignon" et poireau. Intervalle minimum entre les applications : 5 jours.								
<b>11012903</b> Traitements généraux* Trt Sol*Limaces et escargots	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 41	F (BBCH 41)	-	-	-	-
Uniquement sur "choux à inflorescences", choux pommés, légumes-feuilles (frais) et fines herbes. L'usage en application sous abri est également autorisé sur légumes-feuilles (frais) et fines herbes. Intervalle minimum entre les applications : 5 jours.								
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 47	21	-	-	-	-
Uniquement sur choux de Bruxelles. Intervalle minimum entre les applications : 5 jours.								



### Liste des usages autorisés

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

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

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 15	<sup>F</sup> (BBCH 15)	-	-	-	-
Uniquement sur légumineuses potagères (fraîches), légumineuses séchées, maïs, millet, sorgho, plantes sucrières. Intervalle minimum entre les applications : 5 jours.								
<b>11012903</b> Traitements généraux* Trit Soi* Limaces et escargots	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 32	7	-	-	-	-
Uniquement sur "asperge". Intervalle minimum entre les applications : 5 jours.								
	<b>5 kg/ha</b>	<b>5/an</b>	entre les stades BBCH 00 et BBCH 17	<sup>F</sup> (BBCH 17)	-	-	-	-
Uniquement sur "graines oléagineuses". Intervalle minimum entre les applications : 5 jours.								



### Liste des usages autorisés

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

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

Usages	Dose maximale d'emploi	Nombre maximum d'applications	Stade d'application BBCH	Délai avant récolte (jours)	Zone Non Traitée aquatique (mètres)	Zone Non Traitée arthropodes non cibles (mètres)	Zone Non Traitée plantes non cibles (mètres)	Mention abeilles
11012903 Traitements généraux* Trt Sol*Limaces et escargots	5 kg/ha	5/an	entre les stades BBCH 00 et BBCH 29	F (BBCH 29)	-	-	-	-
Uniquement sur blé, triticale, seigle, orge et avoine. Intervalle minimum entre les applications : 5 jours.								
	5 kg/ha	5/an	entre les stades BBCH 00 et BBCH 69	F (BBCH 69)	-	-	-	-
Uniquement sur "vigne", fraisier, framboisier, mûres, myrtilles, aîres, canneberge, grosselier. L'usage est également autorisé sous abri sur fraisier. Intervalle minimum entre les applications : 5 jours.								



### Liste des usages refusés

Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
11012903 Traitements généraux* Tir Sol* Limaces et escargots	5 kg/ha	5/an	7
<b>Motivation du refus :</b> L'usage est refusé sur pommier, poirier, cognassier, nérlier, autres légumes racines et autres légumes-tubercules, "concombre" en raison de l'absence de données permettant d'exclure un risque de dépassement des limites maximales de résidus. L'usage est refusé sur "pomme de terre", "tomate", "poivron" en raison d'un nombre insuffisant d'essais fournis permettant d'exclure un risque de dépassement des limites maximales de résidus.			
11012903 Traitements généraux* Tir Sol* Limaces et escargots	5 kg/ha	5/an	F
<b>Motivation du refus :</b> Les usages sur artichaut, pois frais avec gousse, "mais doux" et prairie sont refusés en raison d'un manque de données résidus permettant d'exclure un risque de dépassement des limites maximales de résidus.			



## Conditions d'emploi du produit

### Stockage et manipulation du produit

- Ne pas stocker le produit dans un local où la température peut dépasser 40 °C.

### 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 à l'aide d'un tracteur équipé d'un microgranulateur ou d'un microgranulateur manuel

- **pendant le chargement du matériel d'épandage**
  - Gants certifiés EN 374-3 ;
  - Combinaison de travail polyester/coton 65 %/35 % (combinaison ou ensemble veste + pantalon) ;
  - 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'épandage**
  - Gants certifiés EN 374-2 à usage unique en cas d'intervention sur semoir, épandeur à engrains ou microgranulateur ;
  - Combinaison de travail polyester/coton 65 %/35 % (combinaison ou ensemble veste + pantalon) ;
- **pendant le nettoyage du matériel d'épandage**
  - Gants certifiés EN 374-3 ;
  - Combinaison de travail polyester/coton 65 %/35 % (combinaison ou ensemble veste + pantalon) ;
  - EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée.

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

- Non pertinent pour ce type d'application.

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

- Ne pas récolter les fruits en contact direct avec le sol traité.
- 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 6 : Pour protéger les oiseaux et les mammifères sauvages, récupérer tout produit accidentellement répandu.

## Exigences complémentaires post-autorisation

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

Détail de la demande post autorisation	Délai (mois)	Récurrence (mois)
Fournir les résultats de l'étude en cours de réalisation, concernant la stabilité au stockage pendant 2 ans, à température ambiante.	24	-
Fournir une méthode de détermination spécifique du Fe <sup>3+</sup> dans le produit.	24	-
Fournir un suivi des effets aigus sur les populations d'oiseaux et de mammifères granivores.	24	-

## 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.

**F3441**

**Autorisation n°**

Appât contenant 16.2 g/kg phosphate ferrique et 10 g/kg métaldehyde

**Poids net nn kg e**

Pour le contrôle des limaces et des escargots en cultures plein champ, en maraîchage, en production de fruits, en cultures florales et sous serres

F3441 contient un répulsif

### SECURITE D'EMPLOI

P102: Conserver hors de la portée des enfants  
P270: Ne pas manger, ne pas boire et ne pas fumer pendant l'utilisation  
P280: Porter un vêtement de protection et des gants appropriés  
P501: Eliminer le contenu/le récipient conformément à la réglementation en vigueur.

EUH401: Respectez les instructions d'utilisation pour éviter les risques pour l'homme et l'environnement.

EUH210: Fiche de sécurité disponible pour les professionnels sur simple demande

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



Distribué par:

Détenteur:  
De Sangosse SAS  
CS10005  
F47480 Pont-du-Casse  
France

No. de lot:

□



**POUR UN EMPLOI MOLLUSCICIDE STRICT EN AGRICULTURE ET EN HORTICULTURE**

Emplois prévus: Toutes cultures  
 Dose d'application maximum: 5 kg/ha  
 Nombre maximal d'applications: 5 par culture  
 Intervalle minimal entre deux applications : 5 jours  
 Date de la dernière application: Se reporter au tableau ci-dessous

Cultures de <del>plein</del> champs	Stades	DAR
Agrumes (Pamplemousse, Oranges, Citrons, Mandarines), arbres à noix (Amandier, noyer, noix du Brésil, noix de cajou, noix de coco, noix de Pécan, noix de Macadamia, pignon, pistache, cacahuète)	BBCH00 <sup>(1)</sup> - BBCH 89	7
Arbres fruitiers à pépins (Pommier, poirier, cognassier, néflier), Arbres fruitiers à noyaux (Abricotier, cerisier, pêcher, prunier)	BBCH00 <sup>(1)</sup> - BBCH 89	7
Vignes pour raisins de table ou de cuve, <del>mûres</del> , autres petits fruits et baies. Fraise	BBCH00 <sup>(1)</sup> - BBCH 69	-
<del>Kiwi, banane</del>	BBCH00 <sup>(1)</sup> - BBCH 64	-
<del>Pomme, de terre</del>	BBCH00 <sup>(1)</sup> - BBCH 97	7
Légumes racine et <del>legume</del> tubercule : betteraves, carotte, raifort, topinambour, panais, persil à grosse racine, radis, salsifis, rutabagas, navets, autres	BBCH00 <sup>(1)</sup> - BBCH 97	7
Ail, oignons, échalotes	BBCH00 <sup>(1)</sup> - BBCH 49	7
Tomates, piments et poivrons, aubergines, gombos, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Concombres, cornichons, courgettes, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Melons, potirons, pastèques, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Choux fleur, <del>broccoli</del> , choux pommés	BBCH00 <sup>(1)</sup> - BBCH 41	-
Choux de Bruxelles,	BBCH00 <sup>(1)</sup> - BBCH 47	21
Laitue, autres salades, épinard, autres <del>legume</del> feuilles (Pourpier, cardon), plantes aromatiques (Cerfeuil, Ciboulette, céleri, persil, sauge, romarin, thym, basilic, laurier sauce, estragon)	BBCH00 <sup>(1)</sup> - BBCH 41	-
Pois et haricots (frais), pois et haricots (secs), lentille, lupin	BBCH00 <sup>(1)</sup> - BBCH 15	-
<del>Asperge</del>	BBCH00 <sup>(1)</sup> - BBCH 32	7
<del>Artichaut</del>	BBCH00 <sup>(1)</sup> - BBCH 51	-
<del>Boîteau</del>	BBCH00 <sup>(1)</sup> - BBCH 49	7
Cultures oléagineuses (Lin, pavot <del>sesame</del> , tournesol, colza, soja, moutarde, coton, citrouille, carthame, bourrache, lin bâtarde, chanvre, ricin) autres oléagineux	BBCH00 <sup>(1)</sup> - BBCH 17	-
Céréales (Blé, orge, avoine, seigle, triticale)	BBCH00 <sup>(1)</sup> - BBCH 29	-
<del>Mais</del> , maïs doux, millet, sorgho	BBCH00 <sup>(1)</sup> - BBCH 15	-
Betteraves sucrières, betteraves fourragères, racines de chicorée	BBCH00 <sup>(1)</sup> - BBCH 15	-
Prairies temporaires	BBCH00 <sup>(1)</sup> - BBCH 15	49
Gazon	BBCH00 <sup>(1)</sup> - BBCH 99	-
Cultures florales et ornementales	BBCH00 <sup>(1)</sup> - BBCH 99	-

Cultures sous <del>abri</del>	Stades	DAR
Fraise	BBCH00 <sup>(1)</sup> - BBCH 69	-
Tomates, piments et poivrons, aubergines, gombos, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Concombres, cornichons, courgettes, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Melons, potirons, pastèques, autres	BBCH00 <sup>(1)</sup> - BBCH 89	7
Laitue, autres salades, épinard, autres <del>legume</del> feuilles (Pourpier, cardon), plantes aromatiques (Cerfeuil, Ciboulette, céleri, persil, sauge, romarin, thym, basilic, laurier sauce, estragon)	BBCH00 <sup>(1)</sup> - BBCH 41	-
Cultures florales et ornementales	BBCH00 <sup>(1)</sup> - BBCH 99	

(1) jusqu'à 14 jours ~~après~~ semis/planter

## RECOMMANDATIONS D'EMPLOI

### Précautions particulières

Ce produit est dangereux pour les animaux domestiques. Tenir les animaux domestiques à l'écart.

Ne pas faire de tas avec les granulés. Balayer et ramasser tous les granulés épandus accidentellement.

Des applications répétées sont recommandées en cas de forte pression de limaces.

### Protection de l'opérateur et du travailleur

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.

Pendant les phases de préparation, de chargement, d'application et de nettoyage :

-Gants en nitrile certifié EN 374-3

-Combinaison de travail en polyester 65% / coton 35% avec un grammage de 230g/m<sup>2</sup>

### Contrôle des limaces et des escargots

Les limaces et les escargots sont des ravageurs très polyphages qu'on rencontre sous toutes les latitudes et qui sont capables de causer de sérieux dégâts à de très nombreuses cultures dont les cultures oléagineuses, les cultures céréalières, le maïs, la vigne, les agrumes, les salades, les choux, les pommes de terre et les cultures florales.

#### Ravageurs

F3441 contrôle plusieurs familles de limaces dont *Agriolimacidae*, *Milacidae*, *Limacidae*, *Arionidae* and plusieurs familles d'escargots dont *Helicidae*, *Hygromiidae*, *Cochlicellidae*, *Achatinidae* and *Ampullariidae*.

Les limaces et les escargots sont des animaux nocturnes et voraces qui se caractérisent par leur prolificité et leur capacité à s'adapter aux changements de conditions de milieu.

Ces gastéropodes causent des dégâts souvent irréversibles, il est donc fortement recommandé de raisonner le risque limace/escargot à la parcelle en déployant une stratégie préventive quand ils font planer une réelle menace.

#### Méthode de lutte globale

Les populations de gastéropodes peuvent atteindre des niveaux très élevés (plus de 100 individus par m<sup>2</sup>) qui les rendent difficiles à contrôler. Il est donc essentiel d'adopter une approche globale en recourant notamment aux moyens de lutte agronomiques ; les opérations de travail du sol superficiel et le roulage sont des interventions à privilégier.

Elles doivent être envisagées en complément des méthodes chimiques.

#### Mode d'action des appâts

Les appâts opèrent lorsque les gastéropodes les consomment ; la quantité d'appât ingérée par individu est donc un facteur clef du succès de cette méthode. Les granulés doivent donc présenter une

excellente appétence de façon à ce que la dose létale de la substance active soit effectivement ingurgitée.

Les granules de F3441 stoppent les dégâts de limaces avant que celles-ci ne meurent.

#### Evaluation des populations de gastéropodes

Pour être en mesure d'évaluer les risques d'attaques, il est essentiel de réaliser un certain nombre d'observations précoces, directes (ravageur aperçu) ou indirectes (traces de consommation sur les repousses). L'utilisation de tapis de sol spécifiques (type INRA) est fortement conseillée. En mettant en œuvre un protocole ad hoc, ces pièges permettent de caractériser et de quantifier la présence et l'activité des limaces.

Ces dénombrements doivent débuter aussi tôt que possible après la récolte du précédent (donc avant les semis) et se poursuivre jusqu'au stade limite de sensibilité de la culture.

#### **Application**

Les granules de F3441 peuvent être appliqués à la main (gants nécessaires) ou à l'aide de matériels spécifiques.

Les applications à la main sont possibles notamment lorsque les zones à traiter sont de petites dimensions ou bien dans le cadre des usages sous serres.

#### Dose recommandée

Dose d'application maximum: 5 kg/ha

Appliquer la dose pleine quand les observations révèlent une présence soutenue et active des gastéropodes.

#### Intervalle et nombre d'applications

Nombre maximal d'applications: 5 par culture

Intervalle minimal entre deux applications : 5 jours

F3441 fait preuve d'une grande résistance au délitement. Il faut cependant prévoir de ~~réintervenir~~ quand les granulés ont été consommés et si de nouvelles générations de mollusques sont constatées.

#### Période d'application

Elle doit prendre en considération:

- La présence du ~~ravageur~~ avérée ou possible
- La partie de la culture qu'il est nécessaire de protéger: Un semis, une plante pérenne ou la partie souterraine d'une plante conditionnent la stratégie et la période d'application.

Les meilleurs résultats sont obtenus ~~tant~~ les applications sont ~~réalisées~~ avant que les dégâts ne soient observés.

Pour les cultures annuelles, il est recommandé de traiter avant la levée.

Afin de ~~contrôler~~ les escargots, il est important de traiter avant qu'ils ne montent dans les parties aériennes.

### **Appendix 3 Letter of Access**

Provided upon request.