REGISTRATION REPORT Part A Risk Management

Product code:

Product name(s): REDIGO PRO

Active Substance(s):

Prothioconazole, 150 g/L

Tebuconazole, 20 g/L

COUNTRY: FRANCE

Interzonal

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(marketing authorisation)

Applicant: BAYER SAS

Date: 31/01/2018

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PART A - Risk Management

The company BAYER S.A.S. has requested marketing authorisation in France for the product REDIGO PRO, containing 150 g/L prothioconazole and 20 g/L tebuconazole for use as a fungicide for seed treatment (FS formulation).

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 REDIGO PRO where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of REDIGO PRO have been made using endpoints agreed in the EU peer review of both prothioconazole and tebuconazole.

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

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 BAYER S.A.S.'s application to market REDIGO PRO in France as a fungicide (product uses described under point 2.3). France acted as interzonal Rapporteur Member State (izRMS) for this request and assessed the application submitted for the first authorisation of this product in France and in other MSs of the European Union.

1.2 Active substance approval

Prothioconazole

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Specific provisions of Regulation (EU) No 540/2011 were as follows:

PART A

Only uses as fungicide may be authorised.

PART B

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 prothioconazole, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 22 January 2008 shall be taken into account.

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

- the operator safety in spray applications. Conditions of use shall include adequate protective measures,
- the protection of aquatic organisms. Risk mitigation measures such as buffer zones shall be applied, where appropriate,
- the protection of birds and small mammals. Risk mitigation measures shall be applied, where appropriate.

Conditions of use shall include risk mitigation measures, where appropriate.

The concerned Member States shall request the submission of:

- information to allow the assessment of consumer exposure to triazole metabolite derivatives in primary crops, rotational crops, and products of animal origin,
- a comparison of the mode of action of prothioconazole and the triazole metabolite derivatives to allow the assessment of the toxicity resulting from the combined exposure to these compounds,
- information to further address the long-term risk to granivorous birds and mammals arising from the use of prothioconazole as a seed treatment.

They shall ensure that the notifier at whose request prothioconazole has been included in this Annex provide such studies to the Commission within two years from the approval.

An EFSA conclusion is available (EFSA Journal (2007) 106; 1-98).

A Review Report is available (SANCO/3923/07 final, 10 December 2007).

Tebuconazole

Commission Implementing Regulation (EU) No 921/2014 of 25 August 2014 amending Implementing Regulation (EU) No 540/2011 as regards the conditions of approval of the active substance tebuconazole.

Specific provisions of Regulation (EU) No 921/2014 were as follows:

PART A

Only uses as fungicide and plant growth regulator may be authorised.

PART B

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 tebuconazole, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 28 October 2008 shall be taken into account. In this overall assessment Member States must pay particular attention to:

- the operator and worker safety and ensure that conditions of use prescribe the application of adequate personal protective equipment;
- the dietary exposure of consumers to the tebuconazole (triazole) metabolites; the potential for groundwater contamination, when the active substance is applied in regions with vulnerable soil or climatic conditions, in particular as regards the occurrence in groundwater of the metabolite 1,2,4-triazole;
- the protection of granivorous birds and mammals and herbivorous mammals and must ensure that the conditions of authorisation include, where appropriate, risk mitigation measures;
- the protection of aquatic organisms and must ensure that conditions of authorisation include risk mitigation measures such as buffer zones, where appropriate.

The Member States concerned shall ensure that the notifier submits to the Commission further information addressing the potential endocrine disrupting properties of tebuconazole within two years after the adoption of the OECD test guidelines on endocrine disruption or, alternatively, of Community agreed test guidelines.

An EFSA conclusion is available (EFSA Journal 2014; 12(1): 3485).

A Review Report is available (SANCO/171/08 rev 2, 11 July 2014).

1.3 Regulatory approach

The present application (2015-1770) was evaluated in France by the French Agency for Food, Environmental and

Occupational Health & Safety (Anses)¹ in the context of the zonal procedure for all Member States of the European Union, taking into account the worst-case uses ("risk envelope approach")² – the highest application rates over the European Union. When risk mitigation measures were necessary, they are adapted to the situation in France.

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

The French Order of 4th May 2017³ provides that:

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

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

The current document (RR) based on Anses's assessment of the application submitted for this product is in compliance with Regulation (EC) no 1107/2009⁴, 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 546/2011⁵, and are expressed as "acceptable" or "not acceptable" in accordance with those criteria.

Finally, the French Order of 26 March 2014⁶ 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 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

¹ French Food Safety Agency, Afssa, before 1 July 2010

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

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

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

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

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

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

Where protection for data is being claimed for information supporting registration of REDIGO PRO it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

1.5 Letter(s) of Access

Not necessary: the applicant has provided sufficient data to show that access is not required.

2 DETAILS OF THE AUTHORISATION

2.1 Product identity

Product name (code)	REDIGO PRO				
Authorisation number	2170700				
Function	Fungicide (for seed treatment)				
Applicant	BAYER SAS				
Composition	150 g/L prothioconazole				
	20 g/L tebuconazole				
Formulation type (code)	Flowable concentrate for seed treatment (FS)				
Packaging	Canister HDPE (5 L, 10 L, 20 L)				
	Barrel HDPE (25 L, 50 L, 200 L)				
	Tank HDPE (1000 L)				
	Canister EVOH / adhesive / HDPE (5 L, 10 L, 20 L)				
	Barrel EVOH / adhesive / HDPE (25 L, 50 L, 200 L)				
	Tank EVOH / adhesive / HDPE (1000 L)				

2.2 Classification and labelling

2.2.1 Classification and labelling under Directive 99/45/EC

Not applicable after 1st June 2015.

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

Physical hazards	-						
Health hazards	Repr. Cat 2	Repr. Cat 2 Toxic for reproduction					
	Skin Sens	1					
Environmental	Hazardous	to the aquatic environment, Acute Hazard, Category 1					
hazards	Hazardous	to the aquatic environment, Chronic Hazard, Category 1					
Hazard pictograms							
Signal word	Warning						
	H361d	Suspected of damaging the unborn child					
	H400	Very toxic to aquatic life with long lasting effects.					
	H410	Very toxic to aquatic life with long lasting effects.					

Precautionary statements –	For the P ph	nrases, refer to the extant legislation
Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008)	EUH208	Contains 1,2-benzisothiazol-3(2H)-one and mixture 5-chloro-2-methyl-4-isothiazolin-3-one and de 2-methyl-2H -isothiazol-3-one. May produce an allergic reaction.

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

2.2.3 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.

2.2.4 Other phrases linked to the preparation

Wear suitable personal protective equipment⁸: refer to the Decision in Appendix 1 for the details

Re-entry period⁹: not applicable for a seed treatment.

Pre-harvest interval¹⁰: not applicable for a seed treatment.

Other mitigation measures:

The label must reflect the conditions of authorisation.

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

The legal basis for this is **Titre I Article 3** of the <u>French Order of 12 September 2006 concerning the marketing and use of products encompassed by article L. 253-1 of the rural code [that is, plant protection products/pesticides]</u>

According to the French Order of 12 September 2006, PHI cannot be lower than 3 days unless specifically stated in the assessment and decision.

2.3 **Product uses**

Please note: The GAP Table below reports the intended uses proposed by the applicant, and possible extrapolation according to French Order of 26 March 2014 (highlighted in green), evaluated and concluded as safe uses by France as izRMS. 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. , date: 2018/01/31

REDIGO PRO \mathbf{FS} PPP (product name/code) Formulation type: active substance 1 prothioconazole Conc. of as 1: 150 g/L active substance 2 Conc. of as 2: 20 g/L/ tebuconazole

active substance 3 Conc. of as 3: Conc. of safener: safener safener

synergist Conc. of synergist: \square Applicant: BAYER SAS professional use

non professional use Zone(s): \mathbf{EU}

Verified by MS: yes

Crop and/ or situation	Zone	Product code	F G or I (b)	Pests or Group of pests controlled	Form	ulation		Application				Application rate per treatment		
					Type (d-f)	Conc. of as (i)	method kind (f-h)	growth stage & season (j)	number min max (k)	mL product/ 100kg seed min max	g active substance/ 100kg seed min max	kg as/ha min max		
Winter and spring Barley	France	REDIG O PRO	F	Ustilago hordei Fusarium sp Microdochiu m nivale Ustilago nuda hordei Pyrenophora graminea	FS	150g /L PTZ & 20g/L TBZ		BBCH 00	1	66,7	10g PTZ & 1,33g TBZ	0,018 PTZ & 0,0024 TBZ	-	Seeding rate: 180 kg/ha Water: 1.0- 1.6 L/dt acceptable

Crop and/ or situation	Zone	Product code	F G or I (b)	Pests or Group of pests controlled	Form	ulation	Application			Application rate per treatment		PHI (days)	Remarks:	
					Type (d-f)	Conc. of as	method kind (f-h)	growth stage & season (j)	number min max (k)	mL product/ 100kg seed min max	g active substance/ 100kg seed min max	kg as/ha min max		
Winter and Spring Oats	France	REDIG O PRO	F	Ustilago hordei Fusarium sp Ustilago nuda hordei	FS	150g /L PTZ & 20g/L TBZ	Seed treatment	BBCH 00	1	66,7	10g PTZ & 1,33g TBZ	0,018 PTZ & 0,0024 TBZ	-	Seeding rate: 180 kg/ha Water: 1.0- 1.6 L/dt acceptable
Winter and Spring Wheat, spelt	France	REDIG O PRO	F	Fusarium spp., Microdochiu m nivale, Tilletia tritici Ustilago nuda tritici Leptosphaeri a nodorum	FS	150g /L PTZ & 20g/L TBZ	Seed treatment	BBCH 00	1	50	7.5 g PTZ & 1 g TBZ	0,0135 PTZ & 0,0018 TBZ	-	Seeding rate: 180 kg seed/ha Water: 1.0- 1.6 L/dt acceptable
Triticale	France	REDIG O PRO	F	Fusarium spp., Microdochiu m nivale, Leptosphaeri a nodorum	FS	150g /L PTZ & 20g/L TBZ	Seed treatment	BBCH 00	1	50	7.5 g PTZ & 1 g TBZ	0.0135 PTZ & 0.0018 TBZ	-	Seeding rate: 180 kg seed/ha Water: 1.0- 1.6 L/dt acceptable

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Crop and/ or situation	Zone	Product code	F G or I (b)	Pests or Group of pests controlled	Form	ulation	Application				Application rat	PHI (days)	Remarks:	
					Type (d-f)	Conc. of as	method kind (f-h)	growth stage & season (j)	number min max (k)	mL product/ 100kg seed min max	g active substance/ 100kg seed min max	kg as/ha min max		
Rye	France	REDIG O PRO	F	Fusarium spp., Microdochiu m nivale,	FS	_		BBCH 00	1	50	7.5 g PTZ & 1 g TBZ	0.0135 PTZ & 0.0018 TBZ	-	Seeding rate: 180 kg seed/ha Water: 1.0- 1.6 L/dt acceptable

Remarks:

- (a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
- (c) e.g. biting and suckling insects, soil born insects, foliar fungi, weeds
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
- (e) GCPF Codes GIFAP Technical Monograph No 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants type of equipment used must be indicated

(i) g/kg or g/l

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- (j) Growth stage at 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
- (k) The minimum and maximum number of application possible under practical conditions of use must be provided
- (l) PHI minimum pre-harvest interval
- (m) 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

The formulation REDIGO PRO is a flowable concentrate for seed treatment. All studies have been performed in accordance with the current requirements. The appearance of the formulation is a red suspension with a paint-like odour. It is not explosive and has no oxidizing properties. It has a self ignition temperature of 490°C and a flash point higher than 93°C. In aqueous solution (1%), its pH is 5.4 at room temperature. Stability data indicate a shelf life of at least 2 years at ambient temperature (EVOH/adhesive/PEHD). Its technical characteristics are acceptable for a flowable concentrate for seed treatment formulation.

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

3.1.2 Methods of analysis

Analytical method for the formulation

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

Analytical methods for residues

Analytical methods are available in the monograph and in this dossier and validated for the determination of residues of tebuconazole and prothioconazole in plants (dry matrices), food of animal origin, soil, water (surface and drinking) and air.

To update the dossier and to be in accordance with sanco/825/00/rev8.1, a confirmatory method for the determination of tebuconazole residues in milk, eggs, meat and a fully validated method with its ILV in fat and liver or kidney are required.

For the determination of prothioconazole residues in foodstuff of animal origin, as the glucoronide conjugates of prothioconazole desthio cannot be analyzed in monitoring, the residue definition for prothioconazole should be amended.

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

The metabolite desthio-prothioconazole is toxic. To update the dossier, an analytical method for the determination of desthio-prothioconazole in tissues and body fluids is required according to sanco/825/00/rev8.1.

3.1.3 **Mammalian Toxicology**

3.1.3.1 Acute Toxicity

The ADI of Prothioconazole (approved) is 0.05 mg/kg bw/day based on the relevant NOAEL from a ratoncogenicity study, with an uncertainty factor of 100. However, the desthio-prothioconazole is more toxic than the prothioconazole, thus the ADI (0.01 mg/b.w./d) of desthio-prothioconazole was retained by EU (MRL regulation) to assess the consumer risk.

The ADI of **Desthioprothioconazole** (approved) is 0.01 mg/kg bw/day based on the relevant NOAEL from a ratoncogenicity study, with an uncertainty factor of 100.

The ADI of Tebuconazole (approved) is 0.03 mg/kg bw./d. based on the relevant NOAEL from a developmental toxicity in mice, with an uncertainty factor of 100.

TOXICITY STUDIES

According to the toxicity studies, the preparation REDIGO PRO had a low dermal, inhalative and oral toxicity. The preparation was not irritant to the skin nor to the eyes. It had no skin sensitizing properties.

The toxicological classification of formulation is not modified by the co-formulants in formulation.

EXPOSURE ASSESSMENTS

The AOEL of **Prothioconazole** (approved) is 0.2 mg/kg bw/day, based on the relevant NOAEL from a combined original and supplementary rat developmental studies, with an uncertainty factor of 100.

The AOEL of **Desthioprothioconazole** (approved) is 0.01 mg/kg bw/day, based on the relevant NOAEL from a supplementary rat developmental study, with an uncertainty factor of 100.

The AOEL of **Tebuconazole** (approved) is 0,03 mg/kg bw/day, based on the relevant NOAEL from a 1-year dog study and a supplementary mouse developmental study, with an uncertainty factor of 100.

No dermal absorption study on the preparation REDIGO PRO has been submitted.

During the evaluation process by the CT in 2006, for the provisory AMM, the dermal absorption values used for the risk assessment were:

- Prothioconazole: 10 % for the undiluted formulation.
- Desthioprothioconazole: 20 % for the undiluted formulation.
- Tebuconazole: 13% for the undiluted formulation.

The same values were retained for the risk assessment.

3.1.3.2 Operator Exposure

A/ Estimate of operator exposure during Seed treatment

The estimate of operator exposure according to SEED TROPEX model revealed that the risk was acceptable for tebuconazole with gloves, coverall during all phases and mask during bagging and cleaning phases (79% AOEL tebuconazole). Considering the results of a field study the risk was acceptable with PPE (1.2% of AOEL prothioconazole and 6.8% of desthioprothioconazole). Keeping in mind that only 4 operators were involved in the field study and the quantity of 17 tons of seeds treated is lesser than the quantity of 75 tons of seeds which corresponds to a production for industrial treatment on cereals.

B/ Estimate of operator exposure during seed loading/sowing

Operator exposure estimation according to the classical old French version of SEED TROPEX model revealed that the risk was acceptable (96% of the AOEL of tebuconazole).

It is known that diluted JAU 6476 formulations can convert to JAU 6476-desthio. A study was conducted to provide information on the proportion of conversion of prothioconazole to desthioprothioconazole during seed loading/sowing. Based on this study, operator exposure to prothioconazole and desthioprothioconazole estimation is 0.6% of the AOEL of prothioconazole and 1.2% of the AOEL of desthioprothioconazole with gloves when handling contaminated surfaces or treated seed. The risk is acceptable for prothioconazole and desthioprothioconazole in the field study keeping in mind that only 3 operators were involved in the field study and the quantity is 2400 kg treated seed (corresponding to an area to be treated of about at least 12h). The loading lasted from about half an hour up to 50 minutes.

A cumulative operator exposure risk was calculated and the estimated exposures are in ANNEX. The specific risks are acceptable.

Nature of protective clothing and PPE for the operator:

During mixing/loading + calibration

- Nitrile gloves certified EN 374-3;
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long sleeved work jacket and long trousers);
- Protective coverall category 3 Type 5/6 worn over the coverall proposed above;
- Respiratory protection P2 (in case of the absence of dust extraction system)

Or

- Nitrile gloves certified EN 374-3
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long sleeved work jacket and long trousers);
- Long-sleeved apron, Category III Type PB3 worn over the coverall proposed above;
- Respiratory protection P2 (in case of the absence of dust extraction system)

Bagging

- Disposable nitrile gloves certified EN 374-2 in the case of an intervention
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long sleeved work jacket and long trousers);
- Respiratory protection P2 (in case of the absence of dust extraction system)

Cleaning

- Nitrile gloves certified EN 374-3;
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long sleeved work jacket and long trousers);
- Protective coverall category 3 Type 5/6 or long-sleeved aprons, Category III Type PB3, worn over the coverall proposed above ;
- Respiratory protection P2 (in case of the absence of dust extraction system)

Nature of protective clothing and PPE for the worker:

Loading of the hopper

- Nitrile gloves certified EN 374-3;
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long sleeved work jacket and long trousers);
- Respiratory protection P2
- Goggles.
- Long-sleeved apron, Category III Type PB3, worn over the coverall proposed above during the loading;

Sowing

- Disposable nitrile gloves certified EN 374-2 in the case of an intervention on application equipment;
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall or long-sleeved work jacket and long trousers).

Cleaning

- Nitrile gloves certified EN 374-3;
- Working coverall 65 % polyester / 35 % cotton; minimum 230 g/m²; with water-repellent treatment (coverall
 or long sleeved work jacket and long trousers);
- Long-sleeved apron, Category III Type PB3, worn over the coverall proposed above;
- Respiratory protection P2
- Goggles.

3.1.3.3 Bystander Exposure

Bystander exposure to active substances is not relevant.

3.1.3.4 Worker Exposure

Re-entry period: not relevant for seed treatment

3.1.4 Residues and Consumer Exposure

3.1.4.1 Residues

Primary crop metabolisms were sufficiently investigated to define residues of tebuconazole and prothioconazole for enforcement and risk assessment in crops under consideration.

Regarding the magnitude of residues in cereals, a sufficient number of residue trials are available to support the intended GAPs in EU. These data allowed to confirm that no MRL exceedance will result from intended uses.

As residues of prothioconazole and tebuconazole do not exceed the trigger value of 0.1 mg/kg in treated crops, there is no need to investigate the effects of industrial and/or household processing.

Residues in succeeding crops have been sufficiently investigated; it is very unlikely that residues will be present in succeeding crops.

Considering dietary burden and based on the intended uses, no significant modification of the intake was calculated for livestock. Further investigation of residues as well as the modification of MRLs in commodities of animal origin is therefore not necessary.

3.1.4.2 Consumer exposure

The toxicological profiles of tebuconazole and prothioconazole were evaluated at EU level, which resulted in the proposal of ADI (0.03 mg/kg for tebuconazole and 0.01 mg/kg for prothioconazole-desthio) and ARfD (0.03 and 0.01 mg/kg, respectively) that were considered in the frame of this evaluation.

Consumer exposure resulting from the acceptable uses proposed in the framework of this application was calculated. Based on EFSA PRIMo (rev2), chronic and acute exposures were considered as acceptable for all groups of consumers.

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

3.1.5 Environmental fate and behaviour

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 prothioconazole, tebuconazole and their metabolites in soil, surface water and groundwater have been assessed according to FOCUS guidance documents, with standard FOCUS scenarios to obtain outputs from the FOCUS models, and the endpoints established in the EU conclusions or agreed in the assessment based on new data provided.

PEC soil and PECsw derived for prothioconazole, tebuconazole and their metabolites are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

PECgw for prothioconazole, tebuconazole and their metabolites do not occur at levels exceeding those mentioned in regulation EC 1107/2009 and guidance document SANCO 221/2000 ¹¹. Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses.

Based on vapour pressure, information on volatilisation from plants and soil, and DT_{50} calculation, no significant contamination of the air compartment is expected for the intended uses.

3.1.6 Ecotoxicology

Appropriate endpoints from the EU conclusions for the active substances and their metabolites were used for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

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

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

3.1.7 Efficacy

Uses (Specific of France)	Corresponding use in the new French catalogue of uses	Dose	Number of applications	Opinion of France for efficacy	Comments (e.g. monitoring) / additional demands
15101201 Wheat*ST*Common wheat bunt (Tilletia caries)		0.05 L/dt	1	acceptable	
15121202 Wheat*ST*Loose smut wheat (Ustilago tritici)	15101201	0.05 L/dt	1	acceptable	
15101203 Wheat*ST*Foot rot (Fusarium spp., Microdochium nivale)	Wheat*ST*Fungus other than Pythiaceae	0.05 L/dt	1	acceptable	
15101208 Wheat*ST*Septoria seedling blight (Leptosphaeria nodorum)		0.05 L/dt	1	acceptable	Provide efficacy trials with REDIGO PRO in post-authorization within 2 years.
15101240 Barley*ST*Loose smut barley (Ustilago nuda)		0.067 L/dt	1	acceptable	
15101306 Barley*ST*Covered smut (<i>Ustilago</i> hordei)	15101245 Barley*ST*Fungus	0.067 L/dt	1	acceptable	Provide the results of the 4 brewing/malting trials with REDIGO
15101209 Barley*ST*Foot rot (Fusarium spp., Microdochium nivale)	other than Pythiaceae	0.067 L/dt	1	acceptable	PRO in post- authorization within 1 year.
15101245 Barley*ST*Barley leaf stripe (Pyrenophora graminea)		0.067 L/dt	1	acceptable	
15101255 Oat*ST*Loose smut oat (Ustilago avenae)		0.067 L/dt	1	acceptable	
15101207 Oat*ST*Covered smut (Ustilago hordei)	15101255 Oat*ST*Fungus other than <i>Pythiaceae</i>	0.067 L/dt	1	acceptable	
15101210 Oat*ST*Foot rot (Fusarium spp., Microdochium nivale)		0.067 L/dt	1	acceptable	
15101212 Rye*ST*Foot rot (Fusarium spp, Microdochium nivale)	15101212 Rye*ST*Fungus other than <i>Pythiaceae</i>	0.05 L/dt	1	acceptable	
15103238 Triticale*ST*Foot rot (Fusarium spp, Microdochium nivale)	15101201 Wheat*ST*Fungus	0.05 L/dt	1	acceptable	
15101264 Triticale*ST*Septoria seedling blight (Leptosphaeria nodorum)	other than Pythiaceae	0.05 L/dt	1	acceptable	

The product complies with the Uniform Principles.

Considering the data submitted:

- ✓ the efficacy of REDIGO PRO is considered as satisfying,
- ✓ the selectivity of REDIGO PRO is considered as satisfying.
- ✓ 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 low.

3.2 Conclusions arising from French assessment

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

3.3 Substances of concern for national monitoring

No information stated.

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

3.4.1 Post-authorisation monitoring

Several azole active substances can be applied on a same field. Considering that 1,2,4-triazole can be formed from most of these azole active substances, an exceedence of the regulatory limit of 0.1 µg/L cannot be excluded. In order to ensure that the regulatory limit in groundwater is not exceeded for 1,2,4-triazole, all applicants of azole-based products are requested to set up a groundwater monitoring dedicated to this metabolite within two years.

3.4.2 Post-authorisation data requirements

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

- To update the dossier and to be in accordance with sanco/825/00/rev8.1, a confirmatory method for the determination of tebuconazole residues in milk, eggs, meat and a fully validated method with its ILV in fat and liver or kidney are required.
- To update the dossier, an analytical method for the determination of desthio-prothioconazole in tissues and body fluids is required according to sanco/825/00/ rev8.1.
- Provide efficacy trials with REDIGO PRO on wheat septoria
- Provide the results of the 4 brewing/malting trials with REDIGO PRO

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 règlementaire,

Vu la demande d'autorisation de mise sur le marché et la demande associée du produit phytopharmaceutique REDIGO PRO

de la société

BAYER SAS

enregistrées sous les

n°2015-1770 et 2015-1771

Vu les conclusions de l'évaluation de l'Anses du 1er août 2017.

Vu la décision du Directeur général de l'Anses du 4 octobre 2017,

Vu le recours gracieux formé le 20 octobre 2017 par la société BAYER SAS,

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 abroge et remplace la décision du 4 octobre 2017 et s'applique sans préjudice des autres dispositions applicables.

Avertissement:

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

REDIGO PRO AMM n°2170700

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Informations générales su	ur le produit					
Noms du produit	REDIGO PRO MISOL PRO					
Type de produit	Produit de référence					
Titulaire	BAYER SAS Division CropScience Département Homologation 16, rue Jean-Marie Leclair CS 90106 69266 LYON CEDEX 09 FRANCE					
Formulation	Suspension concentrée pour traitement des semences (FS)					
Contenant	150 g/L - prothioconazole 20 g/L - tébuconazole					
Numéro d'intrant	897-2015.01					
Numéro d'AMM	2170700					
Fonction	Fongicide					
Gamme d'usages	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 juillet 2019.

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 3 1 Jan. 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)

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ANNEXE I : Modalités d'autorisation du produit

Vente et distribution							
Le titulaire de l'autorisation peut mettre sur le marché le produit uniquement dans les emballages :							
Emballage	Contenance						
Bidons en polyéthylène haute densité	5 L; 10 L; 20 L						
Fûts en polyéthylène haute densité	25 L ; 50 L ; 200 L						
Cuves en polyéthylène haute densité	1000 L						
Bidons en polyéthylène haute densité / éthylène vinyl alcool	5 L; 10 L; 20 L						
Fûts en polyéthylène haute densité / éthylène vinyl alcool	25 L; 50 L; 200 L						
Cuves en polyéthylène haute densité / éthylène vinyl alcool	1000 L						

Classification du produit La classification retenue est la suivante :							
Toxiques pour la reproduction - Catégorie 2	H361d : Susceptible de nuire au fœtus						
Dangers pour le milieu aquatique - Danger aigu, catégorie 1	H400 : Très toxique pour les organismes aquatiques						
Dangers pour le milieu aquatique - Danger aigu, catégorie 1	H410 : Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme						
EUH208 : Contient de la 1,2-benzisothiazol-3(2H)-or	ne et un mélange de 5-chloro-2-methyl-4-isothiazolin-3-one et						

de 2-methyl-2H -isothiazol-3-one. Peut produire une réaction allergique

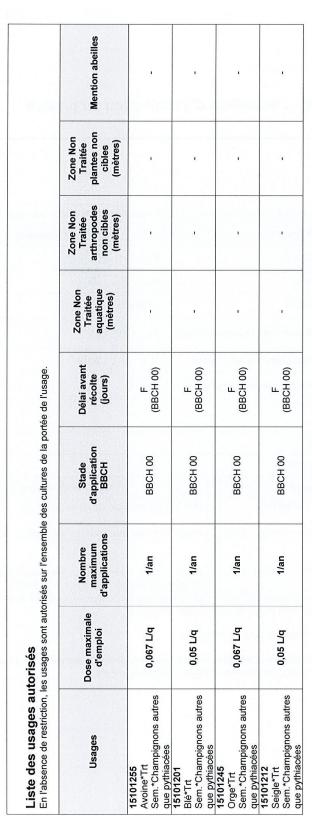
Pour les phrases P se référer à la règlementation en vigueur.

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.

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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 du traitement des semences

• pendant le mélange / chargement + calibrage

- Gants certifiés EN 374-3;
- Vêtement de travail polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon) ;
- Combinaison de protection de catégorie III type 5/6 à porter par-dessus la combinaison précitée ;

Ou

- Gants certifiés EN 374-3;
- Vêtement de travail en polyester/coton 65 % / 35 % (combinaison ou ensemble veste + pantalon) ;
- Blouse ou tablier à manches longues de catégorie III type 3 (PB) à porter par-dessus la combinaison précitée;

· pendant l'ensachage

- Gants certifiés EN 374-2 à usage unique en cas d'intervention ;
- Vêtement de travail en polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon);
- Protections respiratoires certifiées minimum P2 (si le poste d'ensachage n'est pas équipé d'un système d'extraction des poussières) (protection obligatoire).

pendant le nettoyage

- Gants certifiés EN 374-3;
- Vêtement de travail en polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon) ;
- Combinaison de protection de catégorie III type 5 / 6 ou blouse ou tablier à manches longues de catégorie III type 3 (PB) à porter par-dessus la combinaison précitée ;
- Protections respiratoires certifiées P2 minimum (protection obligatoire).

Pour le travailleur, porter

Dans le cadre de la manipulation des semences lors de la phase des semis

• pendant le chargement du semoir

- Gants certifiés EN 374-3
- Vêtement de travail en polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon);
- Blouse ou tablier à manches longues de catégorie III type 3 (PB) à porter par-dessus la combinaison précitée ;
- Protections respiratoires certifiées P2 minimum ;
- Lunettes de protection certifié norme EN 166 (CE, sigle 3).

• pendant le semis

- Gants certifiés EN 374-2 à usage unique en cas d'intervention sur le semoir ;
- Vêtement de travail en polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon).

• pendant le nettoyage

- Gants certifiés EN 374-3 ;

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- Vêtement de travail en polyester / coton 65 % / 35 % (combinaison ou ensemble veste + pantalon) ;
- Combinaison de catégorie III type 5/6 ou blouse ou tablier à manches longues de catégorie III type 3 (PB) à porter par-dessus la combinaison précitée ;
- Protection respiratoire certifiée P2 minimum ;
- Lunettes de protection certifiées norme EN 166 (CE, sigle 3).

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)

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.

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 une méthode d'analyse validée à une limite de quantification inférieure à la Limite Maximale en Résidu (LMR) et sa validation inter-laboratoire pour la détermination du tébuconazole dans la graisse et dans le foie ou les reins.	04/10/2019	
Fournir une méthode de confirmation validée pour la détermination du tébuconazole dans le lait, les œufs et la viande.	04/10/2019	
Fournir une méthode validée permettant la détermination du désthio- prothioconazole dans les fluides et tissus biologiques.	04/10/2019	
Fournir des résultats d'essais d'efficacité contre les septorioses du blé.	04/10/2019	vuldingstijej:
Fournir les résultats des 4 essais de maltage / brassage de la bière, réalisés avec le produit REDIGO PRO.	04/10/2019	-
Mettre en place un suivi dédié au métabolite 1,2,4-triazole afin de s'assurer du respect de la valeur seuil règlementaire de ce métabolite dans les eaux souterraines.	_	<u>-</u>

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

REDIGO PRO

Contient 150 g/l prothioconazole Contient 20 g/l tébuconazole

sous forme de suspension concentrée pour traitement des semences (FS)

RESERVE A UN USAGE EXCLUSIVEMENT PROFESSIONNEL

Tableaux des usages:

Culture	Cibles / Usages	Doses	Spécifications d'usage	DAR (en jours) ou Stades cultures (NC=non concerné)	Précautions environnement (voir légendes)
Avoine	Fusarioses Charbon nu Charbon couvert de l'orge	0.067 1/q	1 trait./an	NC	
Blé	Carie Charbon nu Fusarioses Septorioses	0.05 1/q	l trait./an	NC	
Orge	Charbon nu Helminthosporiose (D. gramineum) Fusarioses Charbon couvert de l'orge	0.067 l/q	l trait./an	NC	
Seigle	Fusarioses	0.05 l/q	l trait./an	NC	
Triticale	Fusarioses Septorioses	0.05 1/q	l trait./an	NC	

Limites maximales en résidus de substances actives : se reporter aux LMR en vigueur au niveau de l'Union Européenne et consultables à l'adresse :http://ec.europa.eu/sanco_pesticides/public/index.cfm

Champ d'activité :

Mode d'emploi:

- Préparation de la bouillie

REDIGO PRO s'utilise sous forme de bouillie à pulvériser sur des semences en mouvement. Avant toute mise en œuvre, bien agiter REDIGO PRO jusqu'à l'obtention d'une suspension homogène. Pour un traitement de qualité, adapter le volume de bouillie au matériel d'application utilisé de façon à obtenir une couverture régulière de la semence.

- Mélanges et Compatibilités

REDIGO PRO est un produit pour le traitement des semences de céréales à action fongicide. Il permet de protéger la semence contre les principales maladies présentes sur la semence ou les maladies issues du sol, avec un haut niveau d'efficacité. Il peut être utilisé seul ou associé à un autre produit TS à action insecticide comme, par exemple, GAUCHO 350.

Dose(s) préconisée(s)

La dose préconisée est la dose homologuée, soit :

- 0,050 litre par quintal de semences sur blé, seigle et triticale.
- 0,067 litre par quintal de semences sur orge et avoine.

Conditions de traitement (époque, stade, seuil d'intervention)

Avant tout traitement, s'assurer que les semences ont été au préalable parfaitement nettoyées, triées et dépoussiérées afin d'optimiser l'application et la tenue du produit sur les semences.

Utiliser du matériel professionnel de traitement des semences, spécifiquement adapté et dédié à cet usage, en respectant les règles de bonnes pratiques et en portant les équipements de protection individuel recommandés.

- Application (matériel, pression)

Préconisations d'emploi :

Avant emploi, agiter REDIGO PRO, présenté sous forme de suspension concentrée, jusqu'à l'obtention d'une suspension homogène.

La mise en œuvre du produit doit être adaptée, par la personne habilitée, en fonction des spécificités de la machine et du process de traitement utilisés.

1) Pour le cas d'une application par bouillie :

Préparation de la bouillie :

- Introduire 80 % du volume d'eau prévu
- Ajouter sous agitation REDIGO PRO puis un éventuel autre produit TS à associer.
- Compléter avec le volume d'eau nécessaire à l'obtention du volume de bouillie souhaité.
- Maintenir sous agitation lente pendant la durée du traitement pour garantir l'homogénéité de la bouillie.
- La bouillie ainsi préparée doit être utilisée dans les 3 jours.

Volume de la bouillie :

Pour un traitement de qualité et donc pour assurer une couverture régulière de la semence, adapter le volume de bouillie en fonction du matériel d'application et des caractéristiques de la semence (espèce, PMG). Pratiquer un premier test puis ajuster de nouveau le volume d'eau. Le volume de bouillie conseillé pouvant yarjer ainsi de 0,8 à 1,5 l/q.

2) Pour le cas d'une application par produit pur :

Circuit REDIGO PRO: bien dimensionner le circuit (débit pompe) pour appliquer la dose homologuée. Circuit eau : volume conseillé de 0,7 à 1,4 l/q selon le matériel et les caractéristiques de la semence (espèce, PMG) pour assurer une couverture régulière de la semence. Pratiquer un premier test puis ajuster de nouveau le volume d'eau.

Recommandation générale

Veiller à bien mettre en œuvre les mesures permettant une maîtrise de la qualité d'application de REDIGO PRO et garantissant sa bonne tenue sur la semence ainsi qu'une couverture maximale de la semence. Pour toute information, consulter notre numéro vert.

Précautions à prendre :

- Pour le stockage

Consignes de stockage:

pour des raisons d'assurance qualité, stocker à des températures comprises entre -10 et +40°C.

ne pas laisser les fûts exposés en plein air, les stocker impérativement à l'abri du soleil.

- Pour l'emploi

Pour l'opérateur, porter:

Mélange / Chargement + calibration

- Gants certifiés EN 374-3;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon);
- Combinaison catégorie III type 5/6;
- Protection respiratoire certifiée minimum P2, si nécessaire.

OU

- Gants certifiés EN 374-3;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon);
- Blouse ou tablier à manches longues de catégorie III type 3 (PB)
- Protection respiratoire certifiée minimum P2, si nécessaire.

Ensachage

- Gants certifiés EN 374-2 à usage unique en cas d'intervention;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon);
- Protection respiratoire certifiée minimum P2 (si le poste d'ensachage n'est pas équipé d'un système d'extraction des poussières).

Nettoyage

- Gants certifiés EN 374-3;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon)
- Combinaison catégorie III type 5/6 ou blouse ou tablier à manches longues de catégorie III type 3 (PB);
- Protection respiratoire certifiée P2 minimum si nécessaire.

Pour le semeur, porter:

Chargement du semoir

- Gants certifiés EN 374-3.
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble yeste+pantalon);
- Protection respiratoire certifiée P2 minimum ;
- Lunettes de protection certifiées norme EN 166 (CE, sigle 3);
- Blouse ou tablier à manches longues de catégorie III type 3 (PB) porté sur le vêtement de travail.

Semis

- Gants certifiés EN 374-2 à usage unique en cas d'intervention sur le semoir;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon).

Nettovage semoir

- Gants certifiés EN 374-3;
- Vêtement de travail polyester/coton 65%/35% (combinaison ou ensemble veste+pantalon)
- Combinaison catégorie III Type 5/6 ou blouse ou tablier à manches longues de catégorie III type 3 (PB);
- Protection respiratoire certifiée P2 minimum ;
- Lunettes de protection certifiées norme EN 166 (CE, sigle 3).

- Pour l'élimination du produit et de l'emballage

- Emballage : réemploi interdit.
- Vider et éliminer les emballages en respectant la réglementation en vigueur.

Redigo® Pro AMM N°: 150 g/l prothioconazole 20 g/l tébuconazole





H361d - Susceptible de nuire au foetus,

H410 - Très toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme.

P280 - Porter des gants de protection/des vêtements de protection/un équipement de protection des yeux/ du visage.

P308 + P313 - EN CAS d'exposition prouvée ou suspectée: consulter un médecin.

P501 - Éliminer le contenu/récipient dans le lieu d'élimination conformément à la réglementation locale.

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

® Marque déposée Bayer Fabrication CEE

Date de fabrication/n° de lot : voir sur l'emballage

Important

Respecter les usages, doses, conditions et précautions d'emploi mentionnés sur l'emballage qui ont été déterminés en fonction des caractéristiques du produitet 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.

 $Appendix \ 3-Letter(s) \ of \ Access$

Not applicable.