# REGISTRATION REPORT Part A Risk Management

Product code: G2429ad

**Product name: PERLOT** 

**Chemical active substance:** 

Maleic hydrazide, 186.5 g/L

Southern Zone
Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE (authorisation renewal)

Applicant: UPL Holdings Coöperatief U.A.

Date: 2024/10/31

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## PART A RISK MANAGEMENT

#### 1 Details of the application

The company UPL Holdings Coöperatief U.A. has requested a marketing authorisation in France for the product PERLOT (product code: G2429ad), containing 186.5 g/L maleic hydrazide<sup>1</sup> as a plant growth regulator for professional uses.

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

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

#### 1.1 Application background

The present registration report concerns the evaluation of UPL Holdings Coöperatief U.A.'s application submitted on 29/01/2018 to market PERLOT (G2429ad) in France (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 re-registration of authorisation after the renewal of approval of the active substance maleic hydrazide of this product in France and in other Member States (MSs) of the Southern zone.

The present application (2018-0441) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses), according to the Regulation (EC) no 1107/2009<sup>2</sup>, the implementing regulations, and French regulations. This application was assessed in the context of the zonal procedure for all MSs of the Southern zone, taking into account the worst-case uses ("risk envelope approach")<sup>3</sup>. When risk mitigation measures were necessary, they are adapted to the situation in France.

The data taken into account are those deemed to be valid either at European level (Review Report and EFSA conclusion) or at zonal/national level. The assessment of PERLOT (G2429ad) has been made using endpoints agreed in the EU peer review of maleic hydrazide. It also includes assessment of data and information related to PERLOT (G2429ad) where those data have not been considered in the EU peer review process.

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 risk assessment conclusions provided in this document are based on the information, data and assessments provided in the Registration Report, Part B Sections 1-10 and Part C, and where appropriate the addendum for France.

The conclusions on the acceptability of risk are based on the criteria provided in Regulation (EU) No 546/2011<sup>4</sup>, and are expressed as "acceptable" or "not acceptable" in accordance with those criteria.

Commission Implementing Regulation (EU) 2017/1506 of 28 August 2017 renewing the approval of the active substance maleic hydrazide in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council concerning the placing of plant protection products on the market, and amending the Annex to Commission Implementing Regulation (EU) No 540/2011

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

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

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

This document also describes the specific conditions of use and labelling required for France for the registration of PERLOT (G2429ad).

#### 1.2 Letters of Access

Not necessary: the applicant is the owner of data which support the renewal of approval of the active substance.

#### 1.3 Justification for submission of tests and studies

According to the applicant:

"The present application has been submitted to renew the authorisation for Perlot in France in accordance with Article 43 of Regulation (EC) No 1107/2009.

Please refer to Appendix F of the enclosed 'Form to notify intended zonal applications under Article 33 and Article 43 of Regulation (EC) No 1107/2009 (SANCO/12544/2014 rev. 0)' in relation to :-

- (a) any new information required as a result of amendments in data requirements or criteria;
- (b) evidence that the new data submitted are the result of data requirements or criteria which were not in force when the authorisation of the formulated product was granted or necessary to amend the conditions of approval."

#### 1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of PERLOT (G2429ad), 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	PERLOT
Product name in MS	G2429ad
Authorisation number	2030274
Kind of use	Professional use
Low risk product (article 47)	No
Function	Plant growth regulator and herbicide
Applicant	UPL Holdings Coöperatief U.A.
Active substance(s) (incl. content)	Maleic hydrazide; 186.5 g/L
Formulation type	Soluble concentrate [SL]

Packaging	HDPE <sup>5</sup> (20 L) Steal drum (200 L)
Coformulants of concern for national authorisations	-
Restrictions related to identity	The impurity hydrazine shall not exceed 0,028 mg/kg in the technical material.
Mandatory tank mixtures	None
Recommended tank mixtures	None

#### 2.2 Conclusion

The evaluation of the application for PERLOT (G2429ad) resulted in the decision **to grant** the authorisation.

#### 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:	Hazardous to the aquatic environment - Chronic Hazard, category 2
Hazard pictograms:	GHS09
Signal word:	-
Hazard statement(s):	H411: Toxic to aquatic life with long-lasting effects.
Precautionary statement(s):	For the P phrases, refer to the existing legislation
Additional labelling phrases:	-

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

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

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

<sup>&</sup>lt;sup>5</sup> high density polyethylene

## 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 4 May 2017<sup>6</sup> provides that:

- unless otherwise stated in the product authorisation, the pre harvest interval (PHI) is at least 3 days;
- unless otherwise stated in the product authorisation, the minimum buffer zone alongside a water body is 5 metres for products applied through spraying or dusting;
- unless otherwise stated in the product authorisation, the minimum re-entry period is 6 hours for field uses and 8 hours for indoor uses.

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

Moreover, the French Order of 12 April 2021<sup>7</sup> provides that:

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

Thus, at French national level, possible extrapolation of submitted data and the corresponding assessment from "reference" crops to "related" ones are undertaken even if not clearly requested by the applicant in their dRR, and a conclusion is also reached on the acceptability of the intended uses on those "related" crops. The aim of this Order, mainly based on the EU document on residue data extrapolation<sup>8</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.

Finally, the French Order of 20 November 2021<sup>9</sup> on the protection of bees and other pollinating insects and the preservation of pollination services when using plant protection products provides that unless otherwise stated in the product authorisation, use on attractive crop<sup>10</sup> when in flower and on foraging area is forbidden. Specific conditions of application on flowering crops should be respected. As consequences specific SPe 8 may include reference to this order.

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

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, amended by the arrêté du 27 décembre 2019 relatif aux mesures de protection des personnes lors de l'utilisation de produits phytopharmaceutiques <a href="https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte">https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte</a>; <a href="https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000039686039&categorieLien=id">https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000039686039&categorieLien=id</a>

https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043401456

<sup>8</sup> SANCO document "guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs": SANCO/7525/VI/95 - rev.9

<sup>9</sup> https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000044346734

List of culture considered as unattractive to bees and other pollinators insects defined by French Agricultural ministry and published in Bulletin Officiel du ministère chargé de l'agriculture.

#### 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 manage	ment (IPM)/sustainable use:
	-
Environmental protection	on
SPe 3	-To protect aquatic organisms, respect an unsprayed buffer zone of 5 metres to surface water bodies.
Other specific restriction	ons
Re-entry period	6 hours.
Storage	The formulation must be stored at a temperature below 40 °C and upper 5 °C.

#### 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, and possible extrapolation according to French Order of 12 April 2021 (highlighted in green), evaluated and concluded as safe uses by France as zRMS. Those uses are then granted in France.

When the conclusion is "not acceptable" or "not finalised", the intended use is highlighted in grey and the main reason(s) reported in the remarks.

When a use is "acceptable" with GAP restrictions, the modifications of the GAP are in bold.

Use should be crossed out when the applicant no longer supports this use.

GAP rev. 1, date: 2024-10-31

PPP (product name/code): PERLOT / G2429ad Formulation type: Soluble concentrate; SL <sup>(a, b)</sup>

Active substance 1: Maleic hydrazide Conc. of a.s. 1: 186.5 g/L (c)

Active substance 2: Conc. of a.s. 2: Active substance 3: Conc. of a.s. 3:

Safener: Conc. of safener:

Synergist: Conc. of synergist:

Applicant: UPL Holdings Coöperatief U.A.. Professional use:

Zone(s): Southern Zone (d) Non-professional use:

Verified by MS: Yes

Field of use: Plant growth regulator

1 2	3	4	5	6	7	8	9	10	11	12	13	14
Use- Member	•		Pests or Group of pests	Application	1			Application rate				Remarks:
	(crop destination/purpose of crop)	Fpn G, Gn,	controlled  (additionally: developmental stages of the pest or pest group)	nd	stage of crop &	b) per crop/	between applications (days)	product/ha a) max. rate per appl.	<ul><li>a) max. rate per appl.</li><li>b) max. total rate</li></ul>	min/ma	(days)	e.g. g safener/synergist per ha

Zonal uses (field or outdoor uses, certain types of protected crops)

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1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use-				Pests or Group of pests	Application			Application rate			PHI	Remarks:	
No. (e)	state(s)	or situation (crop destination/purpose of crop)	Fpn	controlled  (additionally: developmental stages of the pest or pest group)	nd	Timing/Growth stage of crop & season		Min. interval between applications (days)	product/ha a) max. rate per appl. b) max. total rate	g a.s./ha a) max. rate per appl. b) max. total rate per crop/season	min/ma	(days)	e.g. g safener/synergist per ha
1	FR	Tobacco	F	Inhibition of axillary shoots and control of <i>Orobanche</i>	Tractor- mounted, trailed boom and manual (hand-held and knapsack) spraying	When the last leaves have reached a length of 15-20 cm (BBCH 65-69)	1	-	12.0	2.24 kg MH/ha	600	-	Acceptable
2	FR	Tobacco	F	Control of Orobanche	Tractor- mounted, trailed boom and manual (hand-held and knapsack) spraying	When the last leaves have reached a length of 15-20 cm (BBCH 65-69) BBCH 43-46)	1	-	12.0	2.24 kg MH/ha	600	-	Acceptable

#### Remarks table heading:

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

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

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### Remarks columns:

- Numeration necessary to allow references
- 2 Use official codes/nomenclatures of EU Member States
- 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)
- 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.
- Minimum interval (in days) between applications of the same product
- For specific uses other specifications might be possible, e.g.: g/m³ 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)

The formulation PERLOT (G2429ad) is soluble concentrate formulation (SC). 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 that of clear, light yellow liquid. It is not explosive and has no oxidizing properties. The product has a flash point above its boiling temperature. It has a self ignition temperature greater than 400°C. In aqueous solution (1%), its has a pH value 7.7 at 24.3°C. There is no effect of high temperature on the stability of the formulation, 8 weeks at 40°C, neither the active ingredient content nor the technical properties were changed. However, some trace of material separated from the liquid on storage at low temperature are observed. It should be indicated that the preparation must not be stored at temperatures below 5°C. The stability data indicate a shelf life of at least 2 years at ambient temperature when stored in (HDPE). However the full study with results after 2 years is required at post-authorization with the hydrazine level before and after storage according to the regulation (EU) n°2017/1506. Its technical characteristics are acceptable for a soluble concentrate formulation.

The formulation is not classified for the physical-chemical part

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

Considering the data submitted:

- the efficacy level of PERLOT (G2429ad) is considered as satisfactory for all the claimed uses. The period of application on tobacco has been adapted according to agronomic practices. The control on broomrape could be done at BBCH 43-46 and inhibition of axillary sprouts at BBCH 65-69.
- the selectivity level of PERLOT (G2429ad) is considered as acceptable for all the claimed uses.
- o the risk of negative impact on yield and quality is considered as acceptable.
- o In case of use on tobacco for seed production against broomrape, a risk on germination of seeds can't be excluded.
- the risk of negative impact on succeeding and adjacent crops is considered as acceptable.
- the risk of resistance development or appearance of broomrape to maleic hydrazide is considered as low.

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

Analytical method for the determination of active substance is available and validated.

An analytical method for the determination of relevant impurity hydrazine in the formulation is available and validated with LOQ at 3.1 ppb.

Analytical methods are available in the monograph and validated for the determination of residues of maleic hydrazide in plants (high water commodities, acid commodities, oily commodities and dry commodities), food of animal origin, soil, water (surface and drinking) and air.

Analytical methods are available in this dossier and validated for the determination of residues of maleic hydrazide in tabacco.

An analytical method for the determination of residues in biological fluids and tissues is provided in this dossier and is considered validated.

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

#### Endpoints used in risk assessment

Active Substance: Maleic Hydrazide										
ADI	0.25 mg kg bw/d									
ARfD	ARfD Not applicable EU (2017)									
AOEL	0.25 mg/kg bw/d									
Dermal ab- sorption	Based on an in vitro human study performed on formulation or on a s lation default values according to guidance on dermal absorption (Ef									
		Diluted formulation (tested) 8 g/L								
	In vitro (human) %	0.4	1							
		Spray dilution (used in formulation) 8 g/L								
	Dermal absorption endpoints %	1								
Oral absorption	100									

#### 3.4.1 Acute toxicity

PERLOT (G2429ad) containing 186.5 g/L maleic hydrazide has a low toxicity with respect to acute oral, inhalation and dermal toxicity and is not irritating to the rabbit skin or eye and is not a skin sensitiser.

#### 3.4.2 Operator exposure

Summary of critical use patterns (worst cases):

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Crop type	F/G <sup>11</sup>	Equipment  Application method	Maximum application rate kg as /ha	Minimum volume wa- ter (L/ha)
Tobacco*	F	Vehicle mounted/ Down- ward spraying	2.24	600
Tobacco*	F	Manual Knapsack Downward spraying	2.24	600
Tobacco*	F	Manual Hand-Held Downward spraying	2.24	600

<sup>\*</sup> grape used as a surrogate crop. For tobacco, no assigned TC value is available; therefore the TC for grapes has been used as a surrogate as the nature of the harvesting task (*i.e.* leaf pulling and tying) and parts of the body in contact with the foliage (*i.e.* hands . and body) are similar.

Considering the proposed uses, operator systemic exposure was estimated using the EFSA model<sup>12</sup>:

considering the proposed uses, operator systemic enposere was estimated using the Er sir moder.				
Crop	Equipment	PPE and/or working coverall	% AOEL Maleic Hydrazide	
Tobacco*	Vehicle mounted Downward spraying	Working coverall and gloves during mix- ing/loading and application	0.42	
Tobacco*	Manual Hand- Held Downward spraying	Working coverall and gloves during mix- ing/loading and application	8.21	
Tobacco*	Manual Knap- sack Downward spraying	Working coverall and gloves during mix- ing/loading and application	2.29	

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

#### 3.4.3 Worker exposure

Workers may have to enter treated areas after treatment for crop inspection or hand harvesting, searching, reaching, picking activities. Therefore, estimation of worker exposure was calculated according to AOEM model. Exposure is estimated to 72.40 % of the AOEL of Maleic Hydrazide with working coverall. It is concluded that there is (no) unacceptable risk anticipated for the worker.

<sup>&</sup>lt;sup>11</sup> Open field or glasshouse

<sup>&</sup>lt;sup>12</sup> AOEM – Agricultural Operator Exposure Model (EFSA Journal 2014:12 (10):3874)

		maleic hydrazide		
Model data	PPE and/or working coverall	Total absorbed dose (mg/kg/day)	% of systemic AOEL	
Tobacco*				
8 hours/day,	Potential exposure	0.5376	215.04	
Hand harvesting Body weight: 60 kg	Work wear	0.1810	72.40	
DT50: 30 days DFR: 3 µg/cm <sup>2</sup> /kg a.s./ha	Work wear and gloves	- (no TC available for this assessment)	- (no TC available for this assessment)*	

Grape used as a surrogate crop. For tobacco, no assigned TC value is available; therefore the TC for grapes has been used as a surrogate as the nature of the harvesting task (*i.e.* leaf pulling and tying) and parts of the body in contact with the foliage (*i.e.* hands . and body) are similar.

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

#### 3.4.4 Bystander exposure

Consideration of acute exposure should only be made where an AAOEL has been established during an approval, review or renewal evaluation of an active substance, i.e. no acute operator or bystander exposure assessments can be performed with the AOEM model where no AAOEL has been set<sup>13</sup>.

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."

#### 3.4.5 Resident exposure

Residential exposure was assessed according to EFSA model. An acceptable risk was determined for residents (adult and/or child) with a buffer zone of 3 meters

Model (AOEM) - All pathways (mean)	% AOEL Maleic Hydrazide
Resident (children)	4.23
Resident (adults)	1.64

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

As tobacco is not intended for human or animal consumption, there is no need to assess residue levels and the dietary risk associated with use on these crops.

Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products (SANTE-10832-2015 rev. 1.7, 2017)

#### 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 substance and its metabolite 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 maleic hydrazide 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 conclusions or agreed in the assessment based on new data provided.

PEC soil and PECsw derived for the active substance and its metabolite are used for the ecotoxicological risk assessment.

PECgw for maleic hydrazide do not occur at levels exceeding those mentioned in regulation EC 1107/2009. 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 DT50 calculation, 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 conclusions for the active substance(s) and its/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, aquatic organisms, mammals, bees and other non-target arthropods, earthworms, other soil macro-organisms and microorganisms and terrestrial plants are acceptable for the intended uses.

For aquatic organisms, the risk is acceptable if an unsprayed buffer zone of 5 meters to surface water bodies is respected.

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

An assessment was conducted according to the SANCO/221/2000 guidance document. Please refer to environmental fate and behaviour above for conclusion on the risk of groundwater contamination.

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

The active substance maleic hydrazide is not approved as a candidate for substitution, therefore a comparative assessment is not foreseen.

## 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:

The final results after 2 years storage at ambient temperature is required at post-authorization with a hydrazine level in accordance with the limit.

#### **Appendix 1** Copy of the product authorisation

Docusign Envelope ID: 5E926713-E8D9-49B1-BD7A-B9801CC7D25E





## Décision relative à une demande de renouvellement de l'autorisation de mise sur le marché d'un produit phytopharmaceutique et à la demande associée

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 les demandes de renouvellement de l'autorisation de mise sur le marché, suite au renouvellement de l'approbation de la substance active hydrazide maléïque, et de changement de composition du produit phytopharmaceutique **PERLOT** 

de la société UPL HOLDINGS COÖPERATIEF U.A.

enregistrées sous les n° 2018-0441 et 2019-4765

Vu les conclusions de l'évaluation de l'Anses du 30 novembre 2023,

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

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.

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G2429ad / PERLOT Part A - National Assessment FRANCE DEPR version

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Liberté Égalité Fraternité



Informations générales sur le produit			
Nom du produit	PERLOT		
Type de produit	Produit de référence (initialement deuxième gamme avant le renouvellement)		
Titulaire	UPL HOLDINGS COÖPERATIEF U.A. Block A Claudius Prinsenlaan 144a 4818 CP BREDA Pays-Bas		
Formulation	Concentré soluble (SL)		
Contenant	186,5 g/L - hydrazide maléïque		
Numéro d'intrant	2030274		
Numéro d'AMM	2030274		
Fonction	Régulateur de croissance		
Gamme d'usage	Professionnel		

L'échéance de validité de la présente décision est fixée à douze mois à compter de la date d'expiration de l'approbation de la substance active. A titre indicatif, dans l'état actuel du calendrier d'approbation des substances actives, l'échéance de l'autorisation est fixée au 31 octobre 2033.

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 31/10/2024

— Docusigned by: Cliarlotte Grastilleur —AE281A955A42454...

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 : 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	20 L			
Cuves en métal	200 L			

Classification du produit	
La classification retenue est la suivante :	
Catégorie de danger	Mention de danger
Dangers pour le milieu aquatique - Danger chronique, catégorie 2	H411 : Toxique pour les organismes aquatiques entraîne des effets à long terme
Pour les phrases P se référer à la règlementation en viç	gueur.
Le titulaire de l'autorisation est responsable de la r la classification du produit en tenant compte de ses	nise à jour de la fiche de données de sécurité et de

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#### G2429ad / PERLOT Part A - National Assessment FRANCE DEPR version

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Liberté Égalité Fraternité



**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)	Culture attractive en floraison (arrêté du 20/11/2021)
15853901 Tabac*Contrôle Pl. parasites	12 L/ha	1/an	entre les stades BBCH 43 et BBCH 46	-	5	-	-	Non concerné
rabae controle i i. parasites	La période d'application est limitée aux stades entre BBCH 43 et BBCH 46 conformément aux pratiques agricoles pour contrôler l'orobanche ou l'ébourgeonnement.							
<b>15853802</b> Tabac*Trt Part.Aer.*Régul. Croiss. Org. Aériens	12 L/ha	1/an	entre les stades BBCH 65 et BBCH 69	-	5	-	-	Non concerné
	La période d'application est limitée aux stades entre BBCH 43 et BBCH 46 conformément aux pratiques agricoles pour contrôler l'orobanche ou l'ébourgeonnement.							

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#### Conditions d'emploi du produit

#### Stockage et manipulation du produit

- Stocker le produit à une température comprise entre 5 °C et 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 effectuée à l'aide d'un pulvérisateur à dos

#### • pendant le mélange/chargement

- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- Combinaison de protection de catégorie III type 4 ;

#### pendant l'application

- Combinaison de protection de catégorie III type 4 avec capuche ;
- Bottes de protection certifiées EN 13 832-3 ;
- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);

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

- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- Combinaison de protection non tissée de catégorie III type 4 ;

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

#### • pendant le mélange/chargement

- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 ;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus l'EPI vestimentaire précité ;

#### pendant l'application

Si application avec tracteur avec cabine

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1;
- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN ISO 374-2 (types A, B ou C) à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation. Dans ce cas, les gants ne doivent être portés qu'à l'extérieur de la cabine et doivent être stockés après utilisation à l'extérieur de la cabine ;

#### Si application avec tracteur sans cabine

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 ;

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- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN ISO 374-2 (types A, B ou C) à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation ;

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

- Gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A);
- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1;
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus l'EPI vestimentaire précité ;

#### Pour le travailleur, porter

- EPI vestimentaire conforme à la norme NF EN ISO 27065/A1 et, en cas de contact avec la culture traitée, des gants en nitrile certifiés NF EN ISO 374-1/A1 et NF EN 16523-1+A1 (type A).

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

- 6 heures.

#### Protection des personnes présentes et des résidents (au sens du règlement (UE) N°284/2013)

Respecter une distance d'au moins 3 mètres entre la rampe de pulvérisation et :

- l'espace fréquenté par les personnes présentes lors du traitement ;
- l'espace susceptible d'être fréquenté par des résidents.

#### 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 3 : Pour protéger les organismes aquatiques, respecter une zone non traitée de 5 mètres par rapport aux points d'eau.

Le produit peut être utilisé sur les usages autorisés, conformément aux conditions d'emploi antérieures à la présente décision pendant une période de 6 mois.

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

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

- Préciser les conditions optimales d'utilisation sur porte-graines de tabac contre l'orobanche afin de prévenir tout risque d'impact négatif sur la germination.
- Le produit pourrait être affecté par un stockage prolongé à température ambiante

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#### **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.



Ebourgeonnement du TABAC et contrôle de l'orobanche



#### G2429ad / PERLOT Part A - National Assessment FRANCE DEPR version

#### MODE D'ACTION - PROPRIÉTÉS

PERLOT\* est un produit systémique. L'hydrazide maléique, matière active de PERLOT\*, agit en inhibant la division cellulaire, bioquani ainsi la différenciation des bourgeons.

#### **USAGES ET DOSES HOMOLOGUÉS**

CULTURE	USAGE	DOSE A.M.M	Nombre maximum d'applications par parcelle et par an
TABAC	Traitement des parties sériennes "Limitation de la cricissance des organes sériens (ébourgeonnement chimique)	12 L/HA	1
	Contrôle des plantes parasites (probanche)	12 L/HA	

#### RECOMMANDATIONS D'EMPLOI

L'application de PERLOT\* out se faire en plein, evec un volume minimum de bouille de 600 l/he et des buses à turbulence. L'objectif est de countri le tiers vetre la moité aupérieure de la plante. Ne pas traiter en dirigé.

Réaliser l'application sur des plantes saines, présentant un bon état végétalf (absence de malasies, d'invectes, de stress h Sur tabas Burley, de rures cus de phytotoxicité ent été abservés suite à des applications de PERLOTT : En attendant d'en save les consiliens exactes d'apparition de ces symptômes, la apécialité PERLOTT n'est recommandée que sur baisa Virginie.

INMOVILATION :

Landification conclusive des foulites se poursulvant jusqu'à ce qu'elles sient stient le tiers de la crosserce finale, il est consenté
d'applaur PRILUT<sup>1</sup> resuse les derminées fauilles ont stient 15 - 20 cm de long sinn de permettre leur orsistance compétes.

Respecter une déstance mémineum baue-elancée de 30 cm.

I faut 10 hourse pour que le produit net totalement absondé.

#### MISE EN ŒUVRE DE L'APPLICATION

- Préparation de la bouille

   Agine le bion.

   Agine le bion.

   Rempir la cue aux 14 d'eux. Methe sous aglation.

   Vezer le quartife nécessarie de produit firm la cue.

   Vezer le quartife nécessarie de produit firm la cue.

   Compéter le rempissage de la cues en maintenant en route le système d'aglation.

- Application

  \* Waller to go as in publishistion not riskisis your terms du fines gouthiether our une pterfor saine et our faultique acc.

  \* Politier bet applications la soit Veiller à ce que la température soit inférieure à 20°C et que l'hypométric soit aupérature à 50°C et que l'hypométric soit aupérature à 50°C et que l'hypométric soit aupérature à 50°C et que l'hypométric soit au moment du l'application. Paper la l'application et de la température aupérieure à 35°C dans les Pauses qui autent l'application.

  \*\*Ne pair impaire dans les 24 h précident en univent l'application de DREADT.\*\*

Rincage du pulvérisation :
Après l'application, le pulvérisation et la tuyrularie doivent être palquousement riccès à l'eau :-rempt le pulvérisation à 20% sonc de l'eau.

- rempt le pulvérisation de 20% sonc de l'eau.

- l'eau de l'eau d

#### ÉLIMINATION DES EMBALLAGES



aáré et fermant à clé. TENIR A L'ABRI DU GEL ET DE LA CHALEUR

#### ÉQUIPEMENT DE PROTECTION INDIVIDUELLE

- Penant e milingular agement et a metalysis du pubrissance, pour se proliger l'apération del parter :

   d'arms en milit outre de la morné 10 25 de .

   d'arms en milit outre de la morné 10 25 de .

   Véternent impermissir partier (labusa à manches longues) à parter par-dessus in combinsion de treval 
   Polaction registration individuale 
   Des bottes la déglément récommandé de verter du .
- ent recommandé de porter des lunettes de sécurité avec protections latérales ou un écran facial (EH166)

FR-R30-073-03b (1015)

MESURES D'HYGIÈNE GÉNÉRALES :

#### PREMIERS SECOURS:

- \*\*PLEMIEERS OCCUUMD: 1
  To see diministratin impressore à l'air trisé. Appelor un médicion.
  Tin cus de contact trocs is preus. Tillevier le référentes et les chausures contaminés. Liver à l'enu chaude et su sovon. Si les troubles se protrigant constatte un médicion.
  Ten ces de cantict conce le pro-si médicion.
  Ten ces d'impulsion les pas time nome. Ser inventé la bouchés i l'esus Appère un médicion.
  Ten ces d'impulsion les pas time nome. Ser inventé la bouchés i l'esus Appère un médicion.

IMPORTANT:

Resport les susque, deses, conditions et priocusions d'emplis mentionnés sur l'embollage qui ent été déterminés en fonction de conscientiques du prosuit et des applications pour lesquées è ent préconies. Consulters aux ces bases, is culture et les traitements en des les termines que les establisses de la conscience que les consciences avoir en la conscience des les consciences des experisses, tet en est en miture du ce, les conditions mésessonjaues, les méthodes culturales, les versités deplaces, in passage propriétaine, les pouvoir deviders en tabloques les méthodes culturales, les versités deplaces, in passage propriétaines, les pouvoir deviders en tabloques les méthodes culturales, les versités deplaces, in commercialistés des colleurs, etc. et sachair de ce conformations pouvoir influence l'accident de southers, etc. et sachair de ce conformations pouvoir influence l'accident de southers, etc. et sachair de ce ce s'individence provinces de la commercialisté de colleurs, etc. et sachair de ce ce s'individence provinces de la commercialisté de des des montains que de l'accident de la commercialisté de des des montains que poursierne de l'accident de la commercialiste de la

CONSEILS DE PRUDENCE
PIGE Terir hars de pertée des enfants.
PZZO Ne pas manger, bete ou fumer en manipulant ce produit.
PSGN Éliminer le contanuiréopéant comme un déchat dangereux

EUH 210 Fiche de dannées de sécurité disponible our demande EUH 401 Respectez les instructions d'uffication afin d'éditer les risques pour la santé humaine et l'environ

SP1 Ne pas poliuer l'eau avec le produit ou son entrollège. [Ne pas nettayer le matériel d'application près des eaux de aurisce. Eviter la contamination vie les systèmes d'évacuation des eaux à partir des cours de ferme ou des routes].

SPe3. Pour pretégar les organismes aquatiques, respectar une zone non traitée de 5 mètres par repport aux points d'oux.

SPe3. Pour pretégar les plantes non-cièles, , respectar une zone non traitée de 20 mètres par repport à la zone non-cultivée adjacente.

Détai de rentrée : 6h.

Cin can d'argente, apprèse le 15 su le Oorten Antiquiton pour signaler van symptimen au riseau Phyt d'itibule, le vert 10 BIOSE EST (spei) grant quies un reun tout. PRODUCTE POUR LES CONFESCIONES : SILITARIZ LE REPOUNTE PROTUPHARMACEURIGES AUET PRÉJUITION. ANANT TOUT L'ELEATION LISEZ L'ÉTROCETTE ET LES INFONMATIONS CONCERNANT LE PRODUIT, Findhal d'est l'Étre l'Exprése de l'Année de l'Année de l'Année d'est l'Étre d'étaile. Findhal d'est l'Étre l'Exprése (Direction l'Étre) d'Oemicol (Regération Lis, l'armé l'étails. 4 Lunge le 2016, 25 LEO L'étail Mingelen

