<Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products</p>

DRAFT RISK ASSESSMENT OF A BIOCIDAL PRODUCT FOR NATIONAL AUTHORISATION APPLICATIONS

(submitted by the applicant)



Fendona 1.5 SC

Product type 18

alpha-cypermethrin as included in the Union list of approved active substances

Asset Number in R4BP: GR-0015159-0000

NA-MAC Case Number in R4BP: BC-SQ052040-34

Evaluating Competent Authority: Greece

Date: June 2019

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Note

This PAR for the major change application of the product authorisation is based on the PAR of the first authorisation. Each section contains the initial assessment, and new information relating to the major change application is included at the end of each relevant point and highlighted in grey.

Major change application

Use #1, Urban Pest Control (UPC), is now included, which was not approved in the initial authorisation. The following data and information, together with the previously submitted data for the original Mutual Recognition in Parallel (MRP) dossier, are provided to support the authorisation of this use:

- New efficacy data to support the efficacy of Fendona 1.5 SC indoors in Urban Pest Control (Intended use #1) by non-professionals at 15 mg a.s./m² against the following target pests:
- Crawling insects: German cockroaches (*Blattela germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*)
- Flying insects, including houseflies (*Musca domestica*), mosquitoes (*Culex* spp) and wasps (*Vespula* spp).
- ii) An updated environmental risk assessment, using the EU-agreed endpoint for PNEC_{sed}.
- The introduction of the RMM (fsim 0.204% *i.e.* 1-2 applications per year only), permitting safe use for sediment dwelling organisms.

1 CONCLUSION

FENDONA 1.5 SC is a Suspension Concentrate (SC) containing 15 g/L alpha-cypermethrin. Its physicochemical properties are considered acceptable. Acceptable analytical methods have also been submitted.

An acceptable risk to humans, following primary and secondary exposure to the active substance alpha-cypermethrin, has been identified for all uses assessed.

According to the environmental risk assessment, there is an unacceptable risk for sediment dwelling organisms in the urban pest control scenario (scenario 1) when FENDONA 1.5 SC is applied and thus **USE 1 is NOT authorised**. For USE 2, an acceptable risk for non-target organisms is demonstrated provided that label instructions are followed and FENDONA 1.5 SC is ONLY applied in animal subcategories 7, 9, 10, 13, 14, 15 (for explanation of animal subcatefories number see relevant table in page 181). Strictly not to be used in stables/animal housings connected to a sewage treatment plant.

In terms of efficacy, several studies (laboratory, simulated use and field studies) were submitted for Fendona 1.5 SC, using also studies conducted with Fendona 6 SC based on a bridging approach, which are sufficient to prove efficacy of Fendona 1.5 SC indoors in urban pest control (Intended use 1 as applied for by the applicant) by non-professionals at 15 mg a.s./ m^2 and in animal houses/shelters (intended use 2 as applied for by the applicant) by professionals and non-professionals at 15 and 30 mg a.s./ m^2 as follows:

In urban pest control (Intended use 1) the product was proved to be effective against German cockroaches (*Blattella germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*), as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide; and against mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), as a coarse spray onto targeted spots or areas where insects may settle, noting that:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".
- "Residual activity against bedbugs is up to 3 months".
- "Mortality of bedbugs is achieved 1 week after exposure of the insects to the treated surfaces".
- "At least 1 re-application is required against bedbugs.".

In animal houses/shelters (intended use 2) the product was proved to be effective against German cockroaches (*Blattella germanica*), ants (*Lasius niger*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), and is applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle. The product is effective against the target organisms noting that:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".

- "An application rate 15 mg/m² is set for high hygiene shelter places against cockroaches, otherwise an application rate 30 mg/m² should be used".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces) at the low dose and on porous and non-porous surfaces at the high dose".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".

Major change application conclusion

The applicant submitted a major change application in order to include the Intended Use 1 (Urban pest control) as shown in the highlighted table in 2.2.1 (Major change application – Intended uses as applied for by applicant).

In addition to the several efficacy studies (laboratory, simulated use and field studies) originally submitted for the MRP Fendona 6 SC dossier, using also studies conducted with Fendona 6SC based on a bridging approach, one new study (Gibson 2019b) against mosquitoes and houseflies has been submitted by the applicant and included in the PAR to support efficacy of Fendona 1.5 SC indoors in urban pest control (Intended use 1) by non-professionals at 15 mg a.s./m² against the following claimed target pests:

- Crawling insects: German cockroaches (Blattela germanica), ants (Lasius niger) and bedbugs (Cimex lectularius)
- Flying insects, including houseflies (*Musca domestica*), mosquitoes (*Culex* spp) and wasps (*Vespula* spp)

Taking into consideration the efficacy evaluation already performed by the eCA for both intended uses 1 & 2 based on the efficacy studies submitted for MRP Fendona 6SC dossier, the new submitted study by Gibson 2019b, and the conclusions of the teleconference on 5 March 2019 and the outcome of the discussions of 34th CG meeting on 12 March 2019 concerning the Referral to the Coordination Group of a disagreement on Mutual recognition (MR) in accordance with Article 35(2) of the Regulation (EU) No 528/2012 (BPR) for Fendona 6SC, the intended use 1 (urban pest control) of Fendona 1.5 SC, from the efficacy point of view, is acceptable as applied for a major change by the applicant (2.2.1), noting that:

In urban pest control (Intended use 1) the product is efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*), as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide; and against flying insects including houseflies (*Musca domestica*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), as a coarse spray onto targeted spots or areas where insects may settle, with the following limitations per target organism:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitoes (*Culex* spp.) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitoes (*Culex* spp.) is achieved between 2 and 4 days after exposure of the insects to the treated surfaces".

- "Noticeable knockdown effect on houseflies is expected within 6 hours after contact with the treated surfaces and mortality is achieved 24-72 hours after exposure".
- Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".
- "Noticeable knockdown effect on bedbugs is expected within 24 h after contact with treated surfaces and mortality is achieved 1 week after exposure".
- "For the control of bedbugs at least 1 re-application is required".

According to the revised environmental risk assessment, after the major change application amendment, i.e., the introduction of the RMM of 1-2 applications per year (Fsim of 0.204%), an acceptable risk for all environmental compartments is now demonstrated (permitting safe use for sediment dwelling organisms) in the urban pest control scenario (scenario 1), when FENDONA 1.5 SC is applied. Thus **USE 1** is authorised.

2 ASSESSMENT REPORT

2.1 Summary of the product assessment

2.1.1 Administrative information

2.1.1.1 Identifier of the product

Identifier	Country (if relevant)
FENDONA 1.5 SC	GREECE (Reference Member State)

2.1.1.2 Authorisation holder

Name and address of the	Name	BASF Hellas S.A.		
authorisation holder	Address	2 Paradisou Str, 15125 Maroussi - Athens,		
		Greece		
Authorisation number	Not yet av	t yet available		
Date of the authorisation	Not yet av	/ailable		
Expiry date of the	Not yet av	Not yet available		
authorisation				

2.1.1.3 Manufacturer of the product

Name of manufacturer	BASF Agro B.V. Arnhem (NL) – Freienbach Branch
Address of manufacturer	Huobstrasse 3, 8808 Pfäffikon SZ
	Switzerland
	Former address given in the CAR:
	BASF Agro B.V., Arnhem (NL) – Wädenswil Branch
	Moosacherstrasse 2
	CH-8804 Wädenswil/Au
	Switzerland
	The change is due to a relocation of the headquarter of
	BASF Agro BV.
Location of manufacturing	BASF Agri-Production S.A.S., Rue Jacquard; Z.I. Lyon
sites	Nord; 69727 Genay Cedex Lyon, France

2.1.1.4 Manufacturer of the active substance

Z.I.I.4 Manufacturer of the	active substance
Active substance	alpha-Cypermethrin
Name of manufacturer	BASF Agro B.V. Arnhem (NL) – Freienbach Branch
Address of manufacturer	Huobstrasse 3, 8808 Pfäffikon SZ
	Zuerich-Wiedikon
	Switzerland
	Former address given in the CAR:
	BASF Agro B.V., Arnhem (NL) – Wädenswil Branch
	Moosacherstrasse 2
	CH-8804 Wädenswil/Au
	Switzerland
	The change is due to a relocation of the headquarter of
	BASF Agro BV.
Location of manufacturing	Tagros Chemicals India Ltd.
sites	A-4/1&2, Sipcot Industrial Complex
	Pachayankuppam
	Cuddalore-607 005
	India
	and
	Bayer Vapi Private Ltd. (formerly Bilag Industries
	Private Ltd.)

Greece	Fendona 1.5 SC	P118
	Plot No. 306/3; II Phase GIDC, Vapi-396195	
	Gujarat	
	India	

2.1.2 Product composition and formulation

NB: the full composition of the product according to Annex III Title 1 should be provided in the confidential annex.

Does the product have the same identity and composition as the product evaluated in connection with the approval for listing of the active substance(s) on the Union list of approved active substances under Regulation No. 528/2012?

2.1.2.1 Identity of the active substance

2.1.2.1 Identity of the active substance			
Mair	n constituent(s)		
ISO name	Alpha-cypermethrin		
IUPAC or EC name	1:1 mixture (racemate) of the pair of enantiomers		
	(S)-a-cyano-3-phenoxybenzyl-(1R,3R)-3-(2,2-		
	dichlorovinyl)-2,2-		
	dimethylcyclopropanecarboxylate		
	and		
	(R)-a-cyano-3-phenoxybenzyl-(1S,3S)-3-(2,2-		
	dichlorovinyl)-2,2-		
	dimethylcyclopropanecarboxylate		
EC number	Not allocated		
CAS number	67375-30-8		
Index number in Annex VI of CLP	607-422-00-X		
Minimum purity / content	\geq 930 g/kg (93.0 % w/w) (sum of the isomers in		
	a 1:1 ratio)		

CI	Structural formula	
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2.1.2.2 Candidate(s) for substitution

The substitution criteria in BPR Article 10(1)a-f are not met.

2.1.2.3 Qualitative and quantitative information on the composition of the biocidal product

Diocia	ai product				
Common name	IUPAC name	Function	CAS number	EC number	Content (w/w %)
Alpha- cypermethrin	1:1 mixture (racemate) of the pair of enantiomers (S)-a-cyano-3- phenoxybenzyl- (1R,3R)-3-(2,2- dichlorovinyl)-2,2- dimethylcycloprop anecarboxylate and (R)-a-cyano-3- phenoxybenzyl- (1S,3S)-3-(2,2- dichlorovinyl)-2,2- dimethylcycloprop anecarboxylate			Not allocated	
(*)	(*)	Non-active substance	(*)	(*)	(*)

^(*) Please refer to the confidential information in section 2.3 of IUCLID.

2.1.2.4 Qualitative and quantitative information on the composition of the biocidal product family

Fendona 1.5 SC is not a biocidal product family.

2.1.2.5 Information on technical equivalence

Not applicable because the source of active substance is the same as was evaluated for inclusion in the Union list of approved active substances. Please refer to section 2.1.2.

2.1.2.6 Information on the substance(s) of concern

Fendona 1.5 SC contains 1,2-Propylene glycol.

Common name	IUPAC name	Function	CAS number	EC number	Content (w/w%)
1,2-Propylene glycol (1,2-Propylene glycol)	1,2- Propanediol	antifreeze	57-55-6	200-338-0	14.0

2.1.2.7 Type of formulation

SC Suspension concentrate

2.1.3 Hazard and precautionary statements

Classification and labelling of the product according to the Regulation (EC) 1272/2008

Classification

Hazard category Aquatic Acute - Cat. 1 Aquatic Chronic - Cat. 1

Labelling

Pictogram



Signal words Warning

Hazard statements H400 Very toxic to aquatic life

H410 Very toxic to aquatic life with long lasting effects

Precautionary P273 Avoid release to the environment statements

P391 Collect spillage

P501 Dispose of contents/container in accordance with

local/regional/national/international regulation.

Note EUH208: Contains 1,2-Benzisothiazolin-3-one. May produce an

allergic reaction

2.1.4 Authorised use(s)

Table 1. Use # 1 - Rural hygiene (Animal Houses/ Shelters)

Major change:

The Use 1 will be renumbered to Use 2, since an additional use was added under numbering Use 1, following a MAC change

Product Type	PT18 - Insecticides, acaricides and products to control other					
	arthropods (Pest control)					
Where relevant, an	Insecticide					
exact description of the						
authorised use	Carman saskra	ashas (Diattalia	garmanian) nu	manha and		
Target organism	German cockroa			mpns and		
stage)	adults; and ants (<i>Lasius niger</i>), adults. Mosquitoes (<i>Culex spp.</i>), adults; and wasps (<i>Vespula spp</i>),					
	adults	rex spp.), dddre	s, and wasps (v	espaia spp),		
Field of use	Indoors in the following animal house sub-categories: Laying hen, battery cages without treatment, Laying hen, battery cages with forced drying, Laying hen, compact battery cages, Laying hen, free range with grating floor, Parent broiler >18 weeks, free range with grating floor, Parent broiler in rearing, free range with grating floor. Fendona 1.5 SC is a liquid concentrate and it is applied as coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.					
Application method(s)	It should be ap					
Application rate(s) and	sprayer equipped to produce a coarse spray at low pressure. For amateur use application is performed either <i>via</i> hand-held or <i>via</i> trigger sprayer. The appropriate volume of Fendona 1.5 SC is added to the required volume of clean water and agitated. If a delay occurs between treatments, re-agitation is needed before re-use. Fendona 1.5 SC should be applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.					
Application rate(s) and frequency	d Fendona 1.5 Fendona 1.5 SC (mL) LOW DOSE RATE SC (mL) HIGH for dilution (L) Surface area treated (m2)					
	20 40 1 20					
	10 20 0.5 10					
	5 10 0.25 5					
	e.g., for treating 20 m ² surface area, at the low dose 20 ml product is diluted in 1 liter water (1:50; 2.0% whereas, at the high dose rate: 40 ml product is dilut liter water (1:25; 4.0% v/v).					

An application rate 15 mg a.i /m² is set for high hygiene shelter places against cockroaches, otherwise an application rate 30 mg a.i /m² should be used.

Residual Activity: The residual life of the deposit will vary depending upon the cleanliness and nature of the surface to which it is applied, and the extent to which the residue remains undisturbed.

Fendona 1.5 SC exhibits sustained residual activity, up to 1 month, where residues remain undisturbed, against ants (*Lasius niger*).

Activity against German cockroaches is achieved only with fresh deposits.

Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces) at the low dose and on porous and non-porous surfaces at the high dose.

Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months.

Frequency: 4 applications per year

Laying hen, battery cages without treatment, Laying hen, battery cages with forced drying, Laying hen, compact battery cages, Laying hen, free range with grating floor, Parent broiler > 18 weeks, free range with gra

Parent broiler >18 weeks, free range with grating floor, Parent broiler in rearing, free range with grating floor

Category(ies) of users Pack sizes and packaging material

Non-professional and professional Bottle or Bettix container, HDPE.

Non-professional pack sizes: 0.05, 0.1 litres. Professional pack sizes: 0.2, 0.5 and 1 Litres.

The non-professional product pack contains a dosing device.

2.1.4.1 Use-specific instructions for use

Read the label before use.

- Estimate the surface area that needs to be treated.
- Prepare the spray solution by adding the appropriate volume of Fendona 1.5 SC to the required volume of clean water and agitate.
- For non-professional users, the appropriate volume of Fendona 1.5 SC is measured using the dosing device provided in the product pack.
- For professional users, the appropriate volume of Fendona 1.5 SC is measured using the Bettix dispensing product container or a standard dosing device.
- When empty, triple rinse the container and use the rinsate to make up the spray solution for application.
- The appropriate volume of Fendona is measured using the dosing device provided according to the table above (see Application rate(s) & frequency).

Apply using any conventional manual or power sprayer equipped to produce a coarse

spray at low pressure. For amateur use application is performed either *via* hand-held or *via* trigger sprayer. Add the appropriate volume of Fendona 1.5 SC to the required volume of clean water and agitate. If a delay occurs between treatments, re-agitate before re-use.

The low and high application rates are used for low and high levels of infestation, respectively.

Following application, insects that have contacted the deposit should show signs of knockdown within 30 – 60 minutes with noticeable impact on population numbers expected within a few days.

Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces.

Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces.

Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours.

Treated areas should be re-inspected after 2– 3 weeks. Where initial infestation was severe or new infestation is observed, a second application may be required particularly if the first treatment has been disturbed or some harbourages/landing sites were missed in the initial application.

Allow the applied solution to dry before re-entry into the treated areas by either humans or animals.

Strategies for managing the development of resistance:

- Where possible, application treatments should be recommended to be combined with non-chemical measures.
- To avoid the potential for insect resistance to Fendona 1.5SC, treatments should be alternated with insecticidal products having different modes of action.
- If resistance is confirmed, stop the use of Fendona 1.5SC immediately and rotate to an insecticide with alternative mode of action. By removing the selection pressure, the less-fit, resistant individuals will be removed over time and susceptibility should return to the population.
- Apply the recommended label dose rate during the proper timing to ensure complete control of the pest species. By allowing the fewest insects to survive, the spread of the resistant insects will be slowed.
- Follow good application techniques in order to maximize the product activity; deficient applications at less than the recommended label rate will allow the surviving insects to build up the population again, increasing the pest pressure against the product, which may trigger resistance problems in the future.
- Establish a baseline and monitor levels of effectiveness on populations in key areas in order to detect any significant changes in susceptibility to active substance. Information from resistance monitoring programs allows early detection of problems and gives information for correct decision making.
- The users should inform if the treatment is ineffective and report straightforward to the authorization holder. The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.

2.1.4.2 Use-specific risk mitigation measures

Professional operators: Wear protective chemical resistant gloves during product handling phase (glove material to be specified by the authorisation holder within the product information).

A protective coverall (at least type 6, EN 13034) shall be worn.

Allow the applied solution to dry before re-entry into the treated areas by either humans or animals.

Do not use directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and animals.

Do not contaminate foodstuffs, eating utensils or food contact surfaces.

Do not apply to areas susceptible to routine wet cleaning.

Only for application in animal housing authorised.

The product should be applied away from animals' and 'DO NOT apply directly to animals'

Do not use in animal housings where exposure to a STP and/ or direct emission to surface water cannot be prevented.

2.1.4.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

This product contains a mixture of isothiazolinones!

Likely direct or indirect effects

May induce an allergic reaction.

First aid Instructions:

- In case of skin contact wash the affected area with plenty of water without scrubbing. If skin irritation/sensitization occurs, persist or intensifies seek medical advice.
- In case of eye exposure; check for and remove contact lenses, wash eyes with plenty of water maintaining eye lids open for at least 15 minutes.
- Inhalation, keep the individual calm and at rest in half-sitting position, conserve body temperature and control breathing. If necessary provide artificial respiration.
- In case of ingestion wash mouth with plenty of water, do NOT induce vomiting and do NOT give anything by mouth to an unconscious individual. If you experience severe abdominal pain or feel unwell seek medical advice.
- If necessary take the affected individual to a healthcare center and bring packaging or label whenever possible.

NEVER LEAVE AN AFFECTED INDIVIDUAL UNATTENDED!

Advice for medical and healthcare personnel:

Provide symptomatic and supportive treatment.

WHEN ASKING FOR MEDICAL ADVICE KEEP PACKAGING OR LABEL AT HAND AND CALL YOUR LOCAL POISON CONTROL CENTER [INSERT LOCAL NUMBER HERE].

Other cautions:

Use personal protective clothing.

Do not breathe vapour/spray.

Avoid contact with the skin, eyes and clothing.

If medical advice is needed, have product container or label at hand.

Keep out of the reach of children.

Keep away from food, drink and animal feeding stuffs.

When using do not eat, drink or smoke.

Avoid release to the environment.

Collect spillage.

Avoid prolonged contact of pets, particularly cats, to treated surfaces.

2.1.4.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

Empty containers, unused product and other waste generated during the treatment are considered hazardous waste. Eliminate those wastes in accordance with current regulations.

Do not throw on unpaved floors, in watercourses, in the sink or in the drain

Dispose of contents/container to hazardous or special waste collection point.

2.1.4.5	Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

2.1.5 General directions for use

2.1.5.1 Instructions for use

Read the label before use.

- Estimate the surface area that needs to be treated.
- Prepare the spray solution by adding the appropriate volume of Fendona 1.5 SC to the required volume of clean water and agitate.
- For non-professional users, the appropriate volume of Fendona 1.5 SC is measured using the dosing device provided in the product pack.
- For professional users, the appropriate volume of Fendona 1.5 SC is measured using the Bettix dispensing product container or a standard dosing device.
- When empty, triple rinse the container and use the rinsate to make up the spray solution for application.
- The appropriate volume of Fendona is measured using the dosing device provided according to the table above (see Application rate(s) & frequency).

Strategies for managing the development of resistance:

- Where possible, application treatments should be recommended to be combined with non-chemical measures.
- To avoid the potential for insect resistance to Fendona 1.5SC, treatments should be alternated with insecticidal products having different modes of action.
- If resistance is confirmed, stop the use of Fendona 1.5SC immediately and rotate to an insecticide with alternative mode of action. By removing the selection pressure, the less-fit, resistant individuals will be removed over time and susceptibility should return to the population.
- Apply the recommended label dose rate during the proper timing to ensure complete control of the pest species. By allowing the fewest insects to survive, the spread of the resistant insects will be slowed.
- Follow good application techniques in order to maximize the product activity; deficient applications at less than the recommended label rate will allow the surviving insects to build up the population again, increasing the pest pressure against the product, which may trigger resistance problems in the future.
- Establish a baseline and monitor levels of effectiveness on populations in key areas in order to detect any significant changes in susceptibility to active substance. Information from resistance monitoring programs allows early detection of problems and gives information for correct decision making.
- The users should inform if the treatment is ineffective and report straightforward to the authorization holder. The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.
- Read and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.

2.1.5.2 Risk mitigation measures

Please refer to chapter 2.1.4.3 and 2.1.4.8.

2.1.5.3 Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

Please refer to chapter 2.1.4.4 and 2.1.4.9.

2.1.5.4 Instructions for safe disposal of the product and its packaging

Please refer to chapter 2.1.4.5 and 2.1.4.10.

2.1.5.5 Conditions of storage and shelf-life of the product under normal conditions of storage

Ensure thorough ventilation of stores and work areas.

Keep only in the original container.

Keep container tightly closed.

Keep in a safe place.

Shelf-life: The product remains stable for 3 years when stored in its original, unopened container under cool, dry and well-ventilated conditions.

2.1.6 Other information

Application codes:

- main target organisms I3 (3.1.1, 3.3.1, 4.2, 8.1, 10.3, 11, 12.1*, 12.5, 12.6, 13.1). *error in quidance: same code for moths and mosquitoes
- Developmental stages of target organisms to be controlled: II.1.5
- Mode of action: III1.3, III.2.2, III.4.2
- Field of use: IV.1.3.1-1.3.4
- User category: V.1, V.2
- Method of application: VI.1.1
- Application aim: VII.3
- Type of formulation: VIII.3.1.1

The product contains: Alpha-cypermethrin. May cause paraesthesia

Major change application

A new use has been included with this major change application: Use # 1 - Urban Pest Control (Domestic / Households / Private Areas) - General public.

Authorised use(s)

Use description: Use # 1 - Urban Pest Control (Domestic / Households / Private Areas) - General public

Product Type	PT18 - Insectici arthropods (Pes		and products to	control other	
Where relevant, an exact description of the authorised use	Insecticide				
Target organism (including development stage)	German cockroaches (<i>Blattella germanica</i>), nymphs and adults; ants (<i>Lasius niger</i>), adults; bedbugs (<i>Cimex lectularius</i>), nymphs and adults. Flying insects, including houseflies (<i>Musca domestica</i>), adults; mosquitoes (<i>Culex spp.</i>), adults; and wasps (<i>Vespula spp.</i>), adults.				
Field of use	Indoors, in domestic / households / private areas. Fendona 1.5 SC is a liquid concentrate used as a crack & crevice, and /or spot application.				
Application method(s)	Application is performed either via hand- held or via trigger sprayer. The appropriate volume of Fendona 1.5 SC is added to the required volume of clean water and agitated. If a delay occurs between treatments, re-agitation is needed before re-use.				
	For German cockroaches, ants and bedbugs, Fendona should be applied throughout the infested area as a cospray to cracks & crevices, and/or onto targeted spots areas where insects may crawl and hide.				
	For flying insects, Fendona 1.5 SC should be applied throughout the infested area as a coarse spray onto targeted spots or areas where insects may settle.				
Application rate(s) and frequency	Fendona 1.5 SC (mL)	Water volume for dilution (L)	Surface area treated (m2)		
	20	1	20		
	10	<u>0.5</u>	<u>10</u>		
	<u>5</u>	<mark>0.25</mark>	<u>5</u>		
For example, 20 ml product is diluted in 1 litre wat applied per 20 m² surface area (1:50; spray conce 2.0% v/v).					

	Residual Activity: The residual life of the deposit will vary depending upon the cleanliness and nature of the surface to which it is applied, and the extent to which the residue remains undisturbed.
	Fendona 1.5 SC exhibits sustained residual activity, where residues remain undisturbed, for up to 1 month against ants (<i>Lasius niger</i>) and for up to 3 months against bedbugs (<i>Cimex lectularius</i>).
	Activity against German cockroaches is achieved only with fresh deposits.
	Activity against mosquitoes (<i>Culex spp.</i>) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces).
	Residual activity against houseflies (<i>Musca domestica</i>) is up to 3 months.
	Residual activity against wasps (<i>Vespula</i> spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months.
	Frequency: 1-2 applications per year.
Category(ies) of users	General public
Pack sizes and packaging material	HDPE, 0.05, 0.1L

Use-specific instructions for use

-

Use-specific risk mitigation measures

- Frequency: 1-2 applications per year.

For other general risk mitigation measures, please refer to Section 2.1.6.2.2 in Chapter 2.1.6.2 (General directions for use).

Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- Please refer to Section 2.1.6.2.3 in Chapter 2.1.6.2 (General directions for use).

Where specific to the use, the instructions for safe disposal of the product and its packaging

- Please refer to Section 2.1.6.2.4 in Chapter 2.1.6.2 (General directions for use).

Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

- Please refer to Section 2.1.6.2.5 in Chapter 2.1.6.2 (General directions for use).

General directions for use

Instructions for use

Read the label before use and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.

- Estimate the surface area that needs to be treated.
- Prepare the spray solution by adding the appropriate volume of Fendona 1.5 SC to the required volume of clean water and agitate.
- The appropriate volume of Fendona 1.5 SC is measured using the dosing device provided in the product pack.
- When empty, triple rinse the container and use the rinsate to make up the spray solution for application.
- The appropriate volume of Fendona is measured using the dosing device according to the table above (see Application rate(s) & frequency).
- Application is performed either *via* hand-held or *via* trigger sprayer.
- If a delay occurs between treatments, re-agitate before re-use.

Following application, insects that have contacted the deposit should show signs of knockdown within 30 – 60 minutes with noticeable impact on population numbers expected within a few days.

Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces.

Noticeable knockdown effect on bedbugs is expected within 24 h after contact with treated surfaces and mortality is achieved 1 week after exposure

Mortality of mosquitoes (*Culex spp.*) is achieved between 2 and 4 days after exposure of the insects to the treated surfaces.

Noticeable knockdown effect on houseflies is expected within 6 hours after contact with the treated surfaces and mortality is achieved 24-72 hours after exposure.

Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours.

Treated areas should be re-inspected after 2– 3 weeks. Where initial infestation was severe or new infestation is observed, a second application may be required particularly if the first treatment has been disturbed or some harbourages/landing sites were missed in the initial application. For the control of bedbugs at least 1 re-application is required. Allow the applied solution to dry before re-entry into the treated areas by either humans or animals.

Strategies for managing the development of resistance:

- Where possible, application treatments should be recommended to be combined with non-chemical measures.
- To avoid the potential for insect resistance to Fendona 1.5SC, treatments should be alternated with insecticidal products having different modes of action.
- If resistance is confirmed, stop the use of Fendona 1.5SC immediately and rotate to an insecticide with alternative mode of action. By removing the selection pressure, the less-fit, resistant individuals will be removed over time and susceptibility should

return to the population.

- Apply the recommended label dose rate during the proper timing to ensure complete control of the pest species. By allowing the fewest insects to survive, the spread of the resistant insects will be slowed.
- Follow good application techniques in order to maximize the product activity; deficient applications at less than the recommended label rate will allow the surviving insects to build up the population again, increasing the pest pressure against the product, which may trigger resistance problems in the future.
- Establish a baseline and monitor levels of effectiveness on populations in key areas in order to detect any significant changes in susceptibility to active substance.
 Information from resistance monitoring programs allows early detection of problems and gives information for correct decision making.
- The users should inform if the treatment is ineffective and report straightforward to the authorization holder. The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.
- Read and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.

Risk mitigation measures

Professional users: Wear protective chemical resistant gloves during product handling phase (glove material to be specified by the authorisation holder within the product information). A protective coverall (at least type 6, EN 13034) shall be worn.

Allow the applied solution to dry before re-entry into the treated areas by either humans or animals.

Do not use directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and animals.

Do not contaminate foodstuffs, eating utensils or food contact surfaces.

Do not apply to areas susceptible to routine wet cleaning.

Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

This product contains a mixture of isothiazolinones! Likely direct or indirect effects

May induce an allergic reaction.

First aid Instructions:

- In case of skin contact wash the affected area with plenty of water without scrubbing. If skin irritation/sensitization occurs, persist or intensifies seek medical advice.
- In case of eye exposure; check for and remove contact lenses, wash eyes with plenty of water maintaining eye lids open for at least 15 minutes.
- Inhalation, keep the individual calm and at rest in half-sitting position, conserve body temperature and control breathing. If necessary provide artificial respiration.
- In case of ingestion wash mouth with plenty of water, do NOT induce vomiting and do NOT give anything by mouth to an unconscious individual. If you experience severe abdominal pain or feel unwell seek medical advice.

• If necessary take the affected individual to a healthcare center and bring packaging or label whenever possible.

NEVER LEAVE AN AFFECTED INDIVIDUAL UNATTENDED!

Advice for medical and healthcare personnel:

Provide symptomatic and supportive treatment.

WHEN ASKING FOR MEDICAL ADVICE KEEP PACKAGING OR LABEL AT HAND AND CALL YOUR LOCAL POISON CONTROL CENTER [INSERT LOCAL NUMBER HERE].

Other cautions:

Use personal protective clothing.

Do not breathe vapour/spray.

Avoid contact with the skin, eyes and clothing.

If medical advice is needed, have product container or label at hand.

Keep out of the reach of children.

Keep away from food, drink and animal feeding stuffs.

When using do not eat, drink or smoke.

Avoid release to the environment.

Collect spillage.

Avoid prolonged contact of pets, particularly cats, to treated surfaces.

Instructions for safe disposal of the product and its packaging

Empty containers, unused product and other waste generated during the treatment are considered hazardous waste. Eliminate this waste in accordance with current regulations. Do not throw on unpaved floors, in watercourses, in the sink or in the drain.

Dispose of contents/container to hazardous or special waste collection point.

Conditions of storage and shelf-life of the product under normal conditions of storage

Ensure thorough ventilation of stores and work areas.

Keep only in the original container.

Keep container tightly closed.

Keep in a safe place.

Shelf-life: The product remains stable for 3 years when stored in its original, unopened container under cool, dry and well-ventilated conditions.

Other information

Application codes:

- main target organisms I3 (3.1.1, 3.3.1, 4.2, 8.1, 10.3, 11, 12.1*, 12.5, 12.6, 13.1).
- *error in guidance: same code for moths and mosquitoes
- Developmental stages of target organisms to be controlled: II.1.5
- Mode of action: III1.3, III.2.2, III.4.2
- Field of use: IV.1.3.1-1.3.4
- User category: V.1, V.2
- Method of application: VI.1.1

Application aim: VII.3
 Type of formulation: VIII.3.1.1

The product contains: Alpha-cypermethrin. May cause paraesthesia

2.1.7 Packaging of the biocidal product

Type of packaging	Size/volume of the packaging	Material of the packaging	Type and material of closure(s)	Intended user (e.g. professional, non- professional)	Compatibility of the product with the proposed packaging materials (Yes/No)
Bottle or Bettix container	0.05, 0.1, 0.2, 0.5 and 1L 0.05, 0.1 and	Blow moulded high-density polyethylene containers (HDPE)	Sealed by either a foil seals or a polyamide laminated PE-foam	Professional	Yes
	0.2		gasket, screw cap: polyethylene	non- professional	

Major change application

Type of packaging	Size/volume of the packaging	Material of the packaging	Type and material of closure(s)	Intended user (e.g. professional, non- professional)	Compatibility of the product with the proposed packaging materials (Yes/No)
Bottle NB Product pack contains a dosage device	0.05, 0.1 litre	Blow moulded high-density polyethylene containers (HDPE)	Sealed by either a foil seals or a polyamide laminated PE-foam gasket, screw cap: polyethylene	General public	Yes

2.1.8 Documentation

2.1.8.1 Data submitted in relation to product application

New studies on the product have been submitted for the application for product authorisation of Fendona 1.5 SC. Core data such as efficacy effects, physico-chemical properties, storage stability and the analytical method of determination of the a.s. in the biocidal product have been investigated.

Acute toxicity tests as well as tests for skin and eye irritation and skin sensitisation have been conducted with the Fendona 6 SC that represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Further cow and hen feeding studies have been submitted.



Complete information details on the references are given at the end of the document in the list of studies of section 3.1.

Major change application

In this major change application one additional efficacy report has been submitted to support Use 1 (urban pest control) species claims.

Furthermore, the risk assessment has been updated and is no longer refined with the tests performed with *Chironomus riparius* (as stated above). Instead, these studies, using Fendona 6 SC and Fendona 1.5 SC as test item, are included only to indicate the effects of the biocidal products under more realistic conditions compared to the study with the active substance.

2.1.8.2 Access to documentation

The applicant is part of BASF, who are the data owner of the active substance dossier that supported the approval of alpha-cypermethrin for use as a Product Type 18. Therefore, no letter of access is required.

2.2 Assessment of the biocidal product

2.2.1 Intended use(s) as applied for by the applicant

Table 2. Intended use # 1 – Urban pest control (Domestic/ Households/ Private Areas)

Product Type(s)	PT18 - Insecticides, acaricides and products to control other arthropods (Pest control)
Where relevant, an exact	Fendona 1.5 SC is a liquid concentrate used as a crack &
description of the	crevice, and/or spot application indoors.
authorised use	The product is intended for control of crawling and flying
	insects.
	For crawling insects it is applied as a coarse spray to cracks &
	crevices, and/or onto targeted spots or areas where insects may crawl and hide.
	For flying insects it is applied as a coarse spray onto targeted
	spots or areas where insects may crawl or settle.
	Fendona 1.5 SC contains 1.58% w/w of the active substance
	alpha-cypermethrin (TGAI).
Target organism	Crawling insects, including cockroaches (<i>Blattella germanica</i> ,
(including development	Blatta orientalis, Periplaneta americana), ants (Lasius niger),
stage)	bedbugs (Cimex lectularius), and fleas (Ctenocephalides felis).
	Flying insects, including houseflies(Musca domestica),
	mosquitoes (Aedes aegypti, Culex spp), and wasps (Vespula
	spp).
Field of use	Indoors in domestic premises: households, domestic and
	private areas.
Application method(s)	It should be applied using any conventional manual or power
	sprayer equipped to produce a coarse spray at low pressure.
	The appropriate volume of Fendona 1.5 SC is added to the
	required volume of clean water and agitated. If a delay occurs
	between treatments, re-agitation is needed before re-use.
	For crawling insects it is applied as a coarse spray to cracks &
	crevices, and/or onto targeted spots or areas where insects
	may crawl and hide.
	For flying insects it is applied as a coarse spray onto targeted
	spots or areas where insects may settle.
	crawl or settle.
Application rate(s) and	20 mL of product are diluted in 1 L of water (1:50; spray
frequency	concentration: 2.0% v/v). 1 L of diluted product is applied per
, ,	20m² surface area.
	Frequency: 1-2 applications per year.
Category(ies) of user(s)	Non-professional
Pack sizes and packaging	HDPE, 0.01 L to 1 L bottles.
material	Please refer to relevant section (2.1.7).

Table 3. Intended use # 2 - Rural hygiene (Animal Houses/Shelters)

Product Type(s)	PT18 - Insecticides, acaricides and products to control other
	arthropods (Pest control)

Where relevant, an exact description of the authorised use	Fendona 1.5 SC is a liquid concentrate used as a spray application indoors.
authorised use	The product is intended for control of crawling and flying insects. It is applied as a coarse spray for surface treatment, especially to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.
	Fendona 1.5 SC contains 1.58% w/w of the active substance alpha-cypermethrin.
Target organism (including development stage)	Crawling insects, including cockroaches (<i>Blattella germanica</i> , <i>Blatta orientalis</i> , <i>Periplaneta americana</i>), ants (<i>Lasius niger</i>) and litter beetles (<i>Alphitobius diaperinus</i>). Flying insects, including stable flies (<i>Stomoxys calcitrans</i>),
	houseflies (Musca domestica), mosquitoes (Aedes aegypti and Culex spp) and wasps (Vespula spp).
Field of use	Indoors, rural hygiene including dairy cattle, piggeries, stables, poultry houses and similar places where high levels of hygiene are required.
Application method(s)	It should be applied using any conventional manual or power sprayer equipped to produce a coarse spray at low pressure. The appropriate volume of Fendona 1.5 SC is added to the required volume of clean water and agitated. If a delay occurs between treatments, re-agitation is needed before re-use. Fendona 1.5 SC should be applied as a coarse spray for surface treatment, especially to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.
Application rate(s) and frequency	Low rate: Dilute 20 mL product in 1 L of water (1:50; spray concentration: 2.0% v/v). 1 L of diluted product is applied per 20 m² surface area. High rate: Dilute 200 mL product in 5 litres of water (1:25; spray concentration: 4.0% v/v). 1 L of diluted product is applied per 20 m² surface area.
	Frequency: up to 6 applications per year [4 applications for animal (sub)categories: Laying hen, battery cages without treatment, Laying hen, battery cages with forced drying, Laying hen, compact battery cages, Laying hen, free range with grating floor, parent broiler >18 weeks, free range with grating floor, parent broiler in rearing, free range with grating floor, 6 applications for animal (sub)categories: Dairy cow, Beef, Veal Calf, Sow, individual pens, sows in groups, Fattening pig
Category(ies) of user(s)	Non-profesional and professional (depending on the member state's definition of professional in this use area description)
Pack sizes and packaging material	HDPE, 0.01 L to 1 L bottles. Please refer to relevant section (2.1.7)

Major change application - Intended uses as applied for by applicant

In this major change application there has been refinement to the species claimed compared to the initial application, which is reflected in the following two tables. The following Intended Use table also reflects the initial authorisation conditions.

Intended Use # 1 - Urban pest control (Domestic / Households / Private Areas) - General public

Product Type(s)		ides, acaricides	and products to	control other	
NA/le ave ved averet	arthropods (Pes	st control)			
Where relevant, an exact description of the	<u>Insecticide</u>				
authorised use					
Target organism	Crawling insect	s: German cock	roachos (Blatto	<mark>lla</mark>	
(including development		mphs and adult			
stage)		x lectularius), n			
		including housefulex spp.), adult		nestica), adults; /espula spp.),	
Field of use		nestic / househo	olds / private ar	eas.	
		C is a liquid cond r spot applications			
Application method(s)	, ,	erformed either	via hand- held	or via trigger	
		propriate volun			
		quired volume			
		between treatm			
	before re-use.				
	For crawling ins	sects, Fendona :	1.5 SC should b	e applied	
		infested area as			
		r onto targeted	spots or areas	where insects	
	may crawl and	hide.			
	For flying insec	ts, Fendona 1.5	SC should be a	nnlied	
		infested area a			
		or areas where			
Application rate(s) and frequency	Fendona 1.5 SC (mL)	Water volume for dilution (L)	Surface area treated (m2)		
	<mark>20</mark>	1	<mark>20</mark>		
	<u>10</u>	<mark>0.5</mark>	<u>10</u>		
	<u>5</u>	<mark>0.25</mark>	<u>5</u>		
	For example, 2	0 ml product is	diluted in 1 litre	water and	
	applied per 20	m² surface area	(1:50; spray co	oncentration:	
	2.0% v/v).				
	Decidual Askinikus The special and life of the advance in the				
	Residual Activity: The residual life of the deposit will vary depending upon the cleanliness and nature of the surface to				
	which it is applied, and the extent to which the residue				
	remains undisti				
	Against crawlin	g insects Fendo	na 1.5 SC exhib	<mark>its sustained</mark>	

	residual activity, up to 1 month, where residues remain undisturbed, against ants (<i>Lasius niger</i>) and up to 2 month on non-porous surfaces against German cockroaches (<i>Blattella germanica</i>). Residual activity against bedbugs (<i>Cimex lectularius</i>) is up to 3 months.
	Against flying insects Fendona 1.5 SC is efficacious against mosquitoes (<i>Culex spp.</i>) with fresh residues on non-porous surfaces, wasps (<i>Vespula spp.</i>) with fresh deposits and for up to 3 months on non-porous surfaces and house flies (<i>Musca domestica</i>) fo up to 3 months, when residues remain undisturbed.
	Frequency: 1-2 applications per year.
Category(ies) of user(s)	General public
Pack sizes and packaging material	HDPE, 0.05, 0.1L Please refer to relevant section (2.1.7).

2.2.2 Physical, chemical and technical properties

Tested with the minimum and maximum use concentration rate of 2 % - 4 % (v/v).

Property	Guideline and Method	Purity of the test substance	Results	Reference
Physical state at 20 °C and 101.3 kPa	Visual examination	15.0 g/L	Liquid suspension No sedimentation was observed before and after storage (before and after 14 d/54°C,	Kroehl, 2008, 2008/1055117 Kroehl, 2012, 2011/1269168
Colour at 20 °C and 101.3 kPa	Visual examination	15.0 g/L	after 3 yr/23°C storage) White (before and after 14 d/54°C, after 3 yr/23°C storage)	Kroehl, 2008, 2008/1055117 Kroehl, 2012,
Odour at 20 °C and 101.3 kPa	Olfactory examination	15.0 g/L	Odourless (before and after 14 d/54°C, after 3 yr/23°C storage)	Z011/1269168 Kroehl, 2008, 2008/1055117 Kroehl, 2012, 2011/1269168
Acidity / alkalinity	CIPAC MT 75	15.0 g/L	Before (after) 14 d/54°C storage: At room temperature: pH 7.3 (7.0), undiluted; pH 6.6-6.9 (6.6 -7.0), conc. 1%; pH 6.9-7.2 (6.8-7.1), conc. 4%.	Kroehl, 2008, 2008/1055117
			Before (after) 3 yr/23°C storage: At room temperature: pH 7.3 (6.8), undiluted; pH 6.6-6.9 (6.5 -6.7), conc. 1%; pH 6.9-7.2 (6.6-6.9), conc. 4%.	Kroehl, 2012, 2011/1269168
Relative density / bulk density	OECD 109 EU A.3	15.0 g/L	1.02 at 20 °C (before and after accelerated storage, 14d/54°C) The determination of the bulk density must be performed for substances which are supplied as solids. Since the biocidal product is liquid, the determination of the bulk density does not apply.	Kroehl, 2008, 2008/1055117
Storage stability test -	CIPAC MT 46.3	15.0 g/L	No degradation of a.i. was observed over the storage period of 2 weeks at 54 °C.	Kroehl, 2008, 2008/1055117

	Guideline	Purity of		
Property	and	the test	Results	Reference
accelerated	Method CIPAC	substance	No supernatant layer and no	
storage	Analytical method Alpha- cypermethri n 454		sediment after the storage. Active substance concentration: 15.0/15.3 g/L before/after storage. No corrosion and no other influence of the product on the original container (HDPE) was observed. Weight change over the storage period was negligible.	
Storage stability test - long term storage at ambient temperatur e	Storage at 23 °C for 156 weeks CIPAC Analytical method Alpha- cypermethri n 454	15 g/L	Stable at 23°C for 3 years. Active substance concentration: 15.0/15.1 g/L before/after storage. No corrosion and no other influence of the product on the original container (HDPE, 1L and 250 mL) was observed. Weight change over the storage period was negligible (- 0.07 %).	Kroehl, 2012, 2011/1269168
Storage stability test - low temperatur e stability test for liquids	CIPAC MT 39.3	15 g/L	After 7 days at 0 °C, the sample was homogeneous and no separated material was observed.	Kroehl, 2008, 2008/1055117
Effects on content of the active substance and technical characteristic s of the biocidal product - light	-	-	Not applicable as the packaging is light-proof. Therefore, the formulation is not exposed to light during storage.	-
Effects on content of the active substance and technical characteristic s of the biocidal product – temperatur e and humidity	-	-	Not applicable because according to the label instructions the biocidal product has to be kept in original container, tightly closed, in a safe place. It has to be stored in a cool, dry and well ventilated place.	-

	Guideline	Purity of		
Property	and	the test	Results	Reference
	Method	substance		
Effects on content of the active substance and technical characteristic s of the biocidal product -	Accelerated storage, long term ambient storage, low temperature storage as described above	15.0 g/L	No significant changes of packaging stability occurred during the tests. No corrosion and no other influence of the product on the original container (HDPE) was observed. Weight change over the storage period was negligible.	Kroehl, 2008, 2008/1055117
reactivity towards container material			No corrosion and no other influence of the product on the original container (HDPE, 1L and 250 mL) was observed. Weight change over the storage period was negligible (- 0.07 %).	Kroehl, 2012, 2011/1269168
Wettability	_	_	Not applicable as the biocidal product is a liquid.	_
Suspensibilit y, spontaneity and dispersion stability	CIPAC MT 184 CIPAC MT 160	15.0 g/L	Initial/after 14 d/ 54°C storage /after 7 d/0°C storage Suspensibility (GC Chromatography): 1 % (v/v) in CIPAC water D: 98 % / 95 % /97 % 4 % (v/v) in CIPAC water D: 99 % / 99 % /99 % Spontaneity of dispersion: 1 % (v/v) in CIPAC water D: 93 % / 93 % /95 % 4 % (v/v) in CIPAC water D: 96 % / 97 % /97 %	Kroehl, 2008, 2008/1055117
			Initial/after 3 yr/23°C storage Suspensibility (GC Chromatography): 1 % (v/v) in CIPAC water D: 98 % / 95 % 4 % (v/v) in CIPAC water D: 99 % / 98 % Spontaneity of dispersion: 1 % (v/v) in CIPAC water D: 93 % / 97 4 % (v/v) in CIPAC water D: 96 % / 94 %	Kroehl, 2012, 2011/1269168

	Guideline Purity of				
Property	and	the test	Results	Reference	
Wet sieve analysis and dry sieve test	Method CIPAC MT 185	15.0 g/L	No wet sieve retentions observed, no evidence of a significant increase in particle size. Accel. storage (14 d, 54°C): 0.00 % (w/w) retention on a 75 µm sieve before and after storage Low 7 d at 0°C storage: 0.00 % (w/w) retention on a	Kroehl, 2008, 2008/1055117	
Emulsifiabilit			75 µm sieve before and after storage 3 yr /23°C shelf life: 0.00 % (w/w) retention on a 75 µm sieve before and after storage Not applicable, the	Kroehl, 2012, 2011/1269168	
y, re- emulsifiabilit y and emulsion stability	_	_	formulation is not an emulsifiable concentrate.	_	
Disintegratio n time	_	_	Not applicable, the formulation is a liquid.	_	
Particle size distribution, content of dust/fines, attrition, friability	CIPAC MT 187	15.0 g/L	Before (after) accelerated storage (14d, 54°C): D(50%) = 1.9 (2.0) μm D(10%) = 0.7 (0.8) μm D(90%) = 5.8 (5.6) μm	Kroehl, 2008, 2008/1055117	
			Before (after) shelf life storage (3 yr, 23°C): D(50%) = 1.9 (1.9) μm D(10%) = 0.7 (0.8) μm D(90%) = 5.8 (6.2) μm	Kroehl, 2012, 2011/1269168	
Persistent foaming	CIPAC MT 47.2	15.0 g/L	Typical acceptable changes over the storage period. Volulme of foam: all results between 12-32 ml after 1 min.		
			Initial / after 14d/54°C storage (at 1 min.) 1 % in CIPAC water D: 20 mL / 12 mL 4 % in CIPAC water D: 28 mL / 32 mL	Kroehl, 2008, 2008/1055117	

Property	Guideline and Method	Purity of the test substance	Results	Reference
			Initial / after 3 yr/23°C storage (at 1 min.) 1.0 % in CIPAC water D: 20 mL / 20 mL 4 % in CIPAc water D: 28 mL / 32 mL	Kroehl, 2012, 2011/ 1269168
Flowability/P ourability/Du stability	CIPAC MT 148.1	15.0 g/L	Results after pouring: all below 5%; results after 2 nd rinsing and pouring: all below 0.25%. Flowability and dustability not applicable as formulation is a liquid. Residue / rinsed residue after 1 st rinse / rinsed residue after 2 nd rinse	
			Initial 2.87 % / 0.34 % / 0.18 % After accel. storage (14d /54°C) 4.04 % / 0.31 % / 0.20 %	Kroehl, 2008, 2008/1055117;
			Initial 2.87 % / 0.34 % / 0.18 % After shelf life storage (3 yr/23°C) 2.75 % / 0.29 % / 0.20 %	Kroehl, 2012, 2011/ 1269168
			The standard approach recommends a triple-rinse step to avoid residue remainings in the commercial packs.	
Burning rate — smoke generators	_	_	Not applicable, the formulaton is not a smoke generator.	_
Burning completenes s — smoke generators	_	-	Not applicable, the formulaton is not a smoke generator.	_
Composition of smoke — smoke generators	_	_	Not applicable, the formulaton is not a smoke generator.	_
Spraying pattern — aerosols	-	-	Not applicable, the formulation is not an aerosol.	_
Physical compatibility	_	_	The biocidal product is not intended to be used with other	_

Property	Guideline and Method	Purity of the test substance	Results	Reference
			products including other biocidal products.	
Chemical compatibility	-	-	The biocidal product is not intended to be used with other products including other biocidal products.	_
Degree of dissolution and dilution stability	_	_	Not applicable as the product is a liquid.	_
Surface tension	OECD 115 EU A.5	15.0 g/L	71.7 mN/m and 57.1 mN/m at 20 °C (conc. 1% and 4%, resp).	Kroehl, 2008, 2008/1055117
Viscosity	OECD 114	15.0 g/L	At shear ratios 100 1/s and 400 1/s values are in the range 8-24 mPa s, no significant changes of respective values after storage are observed.	
			Initial / after accel storage (14d/54°C): 100 s ⁻¹ : 24 / 23 mPa s (20°C); 21 / 20 mPa s (40°C) 400 s ⁻¹ : 11 / 10 mPa s (20°C) 8 / 8 mPa s (40°C)	Kroehl, 2008, 2008/1055117;
			Initial / after shelf life storage (3 yr/23°C): 100 s ⁻¹ : 24 / 21 mPa s (20°C) 21 / * mPa s (40°C) 400 s ⁻¹ : 11 / 7 mPa s (20°C) 8 / * mPa s (40°C) *: not determined after storage	Kroehl, 2012, 2011/1269168

Note: MMAD data are not submitted since:

a) products are sold separately from the spraying cans, the spraying can is not part of the authorisation (apart from definition: low, medium or high pressure spraying device; hand pumping device or trigger sprays or automated sprayers)

b) it is not an input parameter in human exposure assessment. Human exposure to aerosols of liquid formulations is mainly driven by the pressure applied during the spraying action and of course by the viscosity and surface tension of the formulation. All this factors influence and determine the size of droplets. Therefore human exposure scenarios distinguish between high-

medium- and low pressure spraying. Human exposure is based on an indicative value from a spraying model which comprises also inhalative exposure.

c) it is not relevant for efficacy assessment.

Conclusion on the physical, chemical and technical properties of the product

The physico-chemical properties of the biocidal product have been evaluated and are deemed acceptable for the appropriate use, storage and transportation of the biocidal product. The effect of light was not tested as the packaging is light proof.

Conditions of storage:

Ensure throrough ventilation of stores and work areas.

Keep only in the original container.

Keep container tightly closed.

Keep in a safe place.

Shelf-life: The product remains stable for 3 years when stored in its original, unopened container under cool, dry and well-ventilated conditions.

2.2.3 Physical hazards and respective characteristics

Use concentration rate: 2%-4%.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference
Explosives	EU A.14	BAS 31022I, Batch-no. Batch FRE-000588, 15 g/l.	Not explosive. The exothermic decomposition energy, determined by DSC, is < 500 J/g.	Loehr, 2009, 2009/1046735
Flammable gases	_	-	Not applicable.The biocidal product is not a gas.	_
Flammable aerosols	_	_	Not applicable. The biocidal product is not an aerosol.	_
Oxidising gases	_	_	Not applicable. The biocidal product is not a gas.	
Gases under pressure	_	_	Not applicable. The biocidal product is not a gas.	_
Flammable liquids	EU A.9 (Pensky-	BAS 31022I, Batch-no. Batch	No flash point under ca. 100 °C (boiling	Kroehl, 2008, 2008/1055117

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	
	Martens closed cup) DIN EN 22719	FRE-000588, 15 g/l.	point) at ambient pressure.		
Flammable solids	_	_	Not applicable. The biocidal product is liquid.	_	
Self-reactive substances and mixtures		_	There are no ingredients with explosive or self-reactive properties present in the biocidal product. Therefore the formulation is not self-reactive.	_	
Pyrophoric liquids			The study does not need to be conducted as based on experience in handling and use and the chemical structure of product contents, pyrophoric properties are not to be expected.		
Pyrophoric solids	-	-	Not applicable. The biocidal product is liquid.	-	
Self-heating substances and mixtures		_	The study does not need to be conducted as the biocidal product is liquid. A liquid shows not self-heating behaviour if it is not absorbed on a large surface.		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference
Substances and mixtures which in contact with water emit flammable gases	_		The biocidal product contains water, therefore an emission of flammable gases is not expected when the preparation comes in contact with water.	_
Oxidising liquids	EU A.21	BAS 31022I, Batch-no. Batch free-000588, 15 g/l.	Not oxidizing. Test item mixture did not raise the pressure from 690 kPa to 2070 kPA. Reference mixture raised the pressure in 3420 ms.	Loehr, 2009, 2009/1046735
Oxidising solids	_	-	Not applicable. The biocidal product is liquid.	-
Organic peroxides	-	-	Not applicable. The biocidal product is not an organic peroxide.	-
Corrosive to metals	ASTM G31- 72	Test substance: BA product) Results:		ing from another
		Material Material	General Corrosion liquid / phase boundary liquid- vapor / vapor phase Corrosion rate in mm/year	Local Corrosion Local corrosion rate in mm/year
		Carbon Steel St 37 Al 7075-T6 In accordance with classification of cor	0.019 / 0.036 / 0.110 n/a / n/a / n/a the United Nation	

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference			
		Packing Group III is not assigned to BAS 310 27 1, DocID 2019/1000541, as the corrosion rate is not exceeding 6.25 mm/year. Reference: Titz, 2019, Report 219.1111 TBOI					
Auto-ignition temperatures of products (liquids and gases)	EC method A.15	BAS 31027I, Batch-no. 1051, 61 g/l. (bridging from another product)	425 °C at ambient pressure Based on the compositions of BAS 310 22 I and BAS 310 27 I (see confidential annex).	Loeffler, 2003, 2003/1023335			
Relative self-ignition temperature for solids		_	The relative self-ignition temperature has to be determined for solid biocidal products. Since the biocidal product is liquid this test does not need to be performed.				
Dust explosion hazard	_	_	Not applicable. The biocidal product is liquid unable to produce dust.	_			

Conclusion on the physical hazards and respective characteristics of the product

The safety relevant physico-chemical properties of the biocidal product have been evaluated (Flash point, autoflammability, explosive and oxidising properties). The biocidal product is non-hazardous provided its appropriate use, storage and transportation.

2.2.4 Methods for detection and identification

	Analyti	ical method act		e analysis stance, im				luding the
Analyte (type of analyte e.g. active substance)	Analytic al method	Fortification range / Number of measureme nts	Linearit y	Specificit y	Recove ry rate (%)	Precisio n	Limit of quantificati on (LOQ) or other limits	Reference
Alpha- Cypermeth rin (CIPAC Method 454)	GC-FID	50, 100 and 150% of the formulation	Correlati on coefficie nt R = 0.9999	No interfering signals and no co-elutions were observed in the retention time range of interest between 28.0-31.0 min for alphacypermeth rin	The recovery rates ranged from 98.8% to 99.7%, mean value 99.3%.	The precision based on 5 calibratio n solutions each double injected Mean value 99.45% %RSD: 0.49%		Frohn and Singer, 2014, 2014/129864 0 Concentration of active ingredient: ca. 61 g/L (bridging from another product)
				No interfering signals and no co-elutions were observed in the retention time range of interest between 28.0-31.0 min for alphacypermeth rin				Siebecker, 2017/110671 0

Analytical methods for monitoring of residues in feeding stuff: milk, eggs, meat, liver, kidney, fat

Analyte (type of analyte e.g. active substance	Analytic al method	Fortification range / Number of measureme nts	Linearit y	Specificit y	Recove ry rate (%)	Precisio n	Limit of quantificati on (LOQ) or other limits	Reference
Alpha- cypermethr in	LC- MS/MS	Fortifications levels at LOQ (≤0.01* mg/kg per peak) and at 10xLOQ, each with 5 replicates per level and matrix type	≥ 0.99.	Apparent residues or interferenc es in blank control specimens were below 20 % of the LOQ.	70 % to 110 % for all matrices	RSD ≤ 20 %.	≤0.01 mg/kg for all matrices	Class T.,Bendig P., 2014 [2013/13619 67]
Alpha- cypermethr in	LC- MS/MS	fortification levels at LOQ (≤ 0.01* mg/kg per isomer) and at 10xLOQ.	≥ 0.99.	No significant interferenc e above 30 % of LOQ	70 % to 110 % for all matrices	RSD %) for all fortificati on levels were ≤20%.	≤ 0.01 mg/kg in all matrices	Schernikau N., 2014 [2014/11458 82] ILV of 2013/136196 7

^{*} Actual fortification levels were 0.00695 mg/kg for Cis-II and 0.00429 mg/kg for Trans-IV in relation with the isomer ratio in the reference standards used for fortification.(cis1/Cis2 : 59/41 and trans3/trans4 : 7/3).

Determinat I, Cis II	dation of the ion of Indiv [alpha-cype rs: Thomas	idual or (ermethrir	Combined 1, BAS 31 Mat	l Diaste 01], Tra rices	ereome ans III	ric Forn and Tra	ns of B ans IV)	AS 311 in Anii	mal
Fortification	Fragment	Ci	s I	Cis	s II	Tran	s III	Trar	is IV
Levels	Ion (m/z)	433→	435→	433→	435→	433→	435→	433→	435→
mg/kg		191	193	191	193	191	193	191	193
			Whol	e Milk	_	_			
0.010	Average	92%	91%	86%	89%	103%	94%	80%	82%
0.010 and	RSD	4%	4%	3%	4%	3%	5%	5%	6%
0.1	Replicates	10	10	10	10	10	10	10	10
			Me	eat					
0.010 and	Average	77%	78%	76%	76%	86%	85%	75%	73%
0.010 and 0.1	RSD	7%	6%	5%	5%	10%	10%	3%	3%
0.1	Replicates	10	10	10	10	10	10	10	10
			Kid	ney					
0.010 and	Average	80%	81%	85%	83%	87%	89%	74%	75%
0.010 and 0.1	RSD	9%	7%	6%	6%	10%	11%	4%	3%
0.1	Replicates	10	10	10	10	10	10	10	10
			Liv	/er					
0.010 ===1	Average	88%	90%	87%	88%	88%	90%	89%	89%
0.010 and	RSD	14%	13%	13%	13%	15%	13%	13%	8%
0.1	Replicates	10	10	10	10	10	10	10	10
			Egg (Qu	EChERS)				

0.010 and 0.1	Average	79%	78%	84%	84%	83%	82%	92%	90%
	RSD	6%	6%	3%	4%	13%	12%	10%	12%
	Replicates	10	10	10	10	10	10	10	10
	Fat (DFG S19)								
0.010 and	Average	83%	78%	99%	100%	89%	87%	99%	96%
	RSD	13%	14%	12%	13%	10%	12%	14%	13%
0.1	Replicates	10	10	10	10	10	10	10	10

Independent Laboratory Validation of the BASF Analytical Method L0231/01: Method for the Determination of Individual or Combined Diastereomeric Forms of BAS 311 I (Cis I, Cis II [alpha-cypermethrin, BAS 310I], Trans III and Trans IV)									
in Animal Matrices									
Author(s): N	lina Schernik	cau							
Fortification	Fragment	Ci	s I	Cis	i II	Tran	s III	Trar	ıs IV
Levels	Ion (m/z)	433→	435→	433→	435→	433→	435→	433→	435→
mg/kg		191	193	191	193	191	193	191	193
			Whol	e Milk					
0.010	Average	77%	80%	82%	79%	77%	80%	91%	91%
0.010 and 0.1	RSD	4.6%	3.8%	4.9%	7.2%	5.3%	5.6%	13%	14%
0.1	Replicates	10	10	10	10	10	10	10	10
			Me	eat					
0.010	Average	78%	78%	77%	77%	78%	78%	76%	79%
0.010 and 0.1	RSD	4.4%	5.1%	4.2%	3.7%	4.0%	5.5%	4.1%	9.7%
0.1	Replicates	10	10	10	10	10	10	10	10
			Kid	ney					
0.010 and	Average	83%	84%	82%	82%	84%	86%	73%	74%
0.010 and	RSD	7.9%	7.5%	3.1%	7.2%	9.9%	8.7%	4.1%	5.8%
0.1	Replicates	10	10	10	10	10	10	10	10
			Liv	/er					
0.010 and	Average	84%	83%	82%	83%	85%	83%	74%	74%
0.010 and	RSD	4.5%	4.6%	3.1%	3.9%	5.3%	8.3%	5.1%	4.3%
0.1	Replicates	10	10	10	10	10	10	10	10
	<u> </u>	Egg	(QuEChE	RS with	water)				
0.010 and	Average	86%	88%	85%	84%	91%	92%	86%	83%
0.010 and	RSD	7.8%	7.4%	6.5%	5.9%	11%	9.7%	7.9%	7.8%
0.1	Replicates	10	10	10	10	10	10	10	10
				G S19)	T	T	1	T	
0.010 and	Average	94%	93%	95%	93%	97%	103%	80%	77%
0.010 and	RSD	8.7%	8.7%	4.5%	7.0%	7.5%	6.1%	8.1%	6.2%
0.1	Replicates	10	10	10	10	10	10	10	10

Analytical methods for the determination of active substance is acceptable since it is a CIPAC Method and specificity was investigated. Note: the validation data are from Fendona 6 SC (BAS 310 27 I)

Residues in relevant environmental media (soil, air and water) were not submitted for the biocidal product, since this point is covered by the data set of the active substance alphacypermethrin.

Analytical methods for the determination of active substance residues in milk, eggs, meat, liver, kidney and fat has been submitted and considered acceptable and validated. The method is highly specific and a confirmatory method is not required, ILV has also been submitted. The method L0231/01 is therefore considered suitable to determine individual (Cis-1, Cis-2, Trans-3 and Trans-4) or combined cypermethrin diastereomers forms in animal matrices (milk, liver, kidney, muscle, egg and fat) with an LOQ of 0.01 mg/kg for the Cis-1 and Trans-3 isomers and 0.00695 mg/kg for Cis-2 and 0.00423 mg/kg for Trans-4. The method L0231/01 can be recommended for enforcement/monitoring purposes. Additionally, transformation of alpha-Cypermethrin (Cis II) to its Cis I diastereomeric form was not significant in the extracts.

Conclusion on the methods for detection and identification of the product

All submitted methods are considered acceptable no further data are required.

2.2.5 Efficacy against target organisms

2.2.5.1 Function and field of use

The product Fendona 1.5 SC is an insecticide (PT18) intended to be used indoors for rural hygiene (Animal Houses/Shelters) by professional and non-professional users. The product is applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.

2.2.5.2 Organisms to be controlled and products, organisms or objects to be protected

In animal houses/shelters the product is efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*).

2.2.5.3 Effects on target organisms, including unacceptable suffering

Alpha-cypermethrin is a synthetic pyrethroid. Intoxication results in a rapid "knockdown" and resultant mortality. The affected insect shows uncoordinated movements and finally dies. Following application, insects that have contacted the deposit should show signs of knockdown within 30 – 60 minutes with noticeable impact on population numbers expected within a few days.

In addition to the "knockdown" effect, Fendona 1.5 SC exhibits also sustained residual activity, depending on the target organism, up to 3 months, where residues remain undisturbed.

2.2.5.4 Mode of action, including time delay

As a synthetic pyrethroid alpha-cypermethrin does not depend on conversion or degradation to an active form in order to exert its insecticidal activity. It acts by preventing transmission of impulses along nerves on adult insects. This effect is brought about by blocking the passage of positive sodium ions through sodium channels in nerve membranes, thus preventing action potentials passing down axons.

2.2.5.5 Efficacy data

Function	Field of use envisaged	Test substance	Test organism(s)	Test method	Test system / concentrations applied / exposure time	-	Reference
Insecticide; Control of flying and crawling insects	indoor application, crack and crevice treatment	Fendona 6 SC; Product used for read across . A detailed justification for read across is given below the table	Blattella germanica (German cockroach) (Nymphs and adults)	Field trial	For details on Test system / concentrations applied / exposure see the following row *	For details on test results see the following row marked with **	Estany, D., 2016a; DocID# 2016_1091548 Study Code 15/166CC Estany, D., 2016b; DocID# 2016_1091543 Study Code 15/166EE with Addendum: DocID_2017_1119568 Estany 2016a not accepted study Estany 2016b accepted study

* Field trials:

Sites with an infestation of German cockroaches were located, separated from any other infestations. A pre-monitoring assessment was conducted to establish the infestation level at the sites. The number of cockroaches trapped was recorded over a period of 24 or 48 hours, at 2 days prior to application. The treatment was then applied at the site. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at weekly intervals for a total of 4 weeks post initial treatment application (6 weeks in only one site at the low dose). The number of any visible knocked down and dead cockroaches were assessed. Applications were done to cracks and crevices in the treatment areas by using a pressurised sprayerwand at a rate of 15 and 30 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted. In the study by Estany 2016a (15 mg a.i./m²), the site 1 had not been treated before, in the site 2 no additional insecticide treatments were applied 3 months previous to the Fendona 6 SC test treatment, and the Site 3 was previously treated with another insecticidal product (D-tetramethrin 0.23%, Cyphenothrin 0.18%, Pyriproxyfen 0.0095%) about one month before the experimental treatment with Fendona 6 SC. The study by Estany 2016a is not valid due to the treatment history in site 3.

In the study by Estany 2016b (30 mg a.i/m2), in site 1 no additional insecticide treatments were applied 3 months previous to the Fendona 6 SC test treatment while the sites 2 and 3 had not been treated before. Hence, the study by Estany 2016b is valid.

** Efficacy:

The application of Fendona 6 SC at 15 mg a.i. per m² resulted in an average 86.0% reduction in German cockroaches after a 4 week period. The overall efficacy level (86%) was affected by the considerably low population reduction (77%) at site 2 which is justified by the moderate sanitation level, the comparatively high pest activity before treatment (1.5 to 2 times higher than the other two sites), and possible re-invasion of cockroaches from adjacent areas should have been occurred according to the applicant. Population reduction of German cockroaches in sites 1 and

3 was 88.6% and 92.2%, respectively, after a 4-week period (90.4% in average). However, the results of the study by Estany 2016a are not valid due to the treatment history in site 3.

In addition, it was impossible to obtain 6-week residual data from two of the three sites treated with the low dose because those replicates were disturbed by the property owner. The application of Fendona 6 SC at 30mg a.i. per m² resulted in an average 96.9% reduction in German cockroaches after a 4 week period.

It can be concluded that Fendona 6 SC was effective at 30 mg a.i. per m² against German cockroaches in terms of population reduction.

		_					
Insecticide; Control of	indoor application,	Fendona 6 SC;	Lasius niger (Garden ant)	Field trial	For details on Test system /	For details on test results see the	Gibson, D., 2016a; DocID#
flying and	spotted	Product used			concentrations	following row	2016_1100538
crawling	treatment	for read			applied /	marked with **	Study Code 15/166 B
insects		across. A			exposure see		
		detailed			the following		Not accepted study
		justification			row *		
		for read					
		across is					
		given below					
		the table					

* Field trial:

Six sites with an infestation of black ants, Lasius niger, were located; three were treated and three were left untreated. Each site was observed to determine areas of ant activity near a nest. The number of ants present in a specific area $(1 \text{ m}^2 - 2 \text{ m}^2)$ was assessed. For each site the area of ant activity assessed was marked with spray paint at the corners and the treatment was then applied. The number of ants present was assessed in the same manner as for the pre-treatment, at 2, 7, 14, 21 and 28 days post treatment. Applications were done as spotted surface treatments by using a hand held pressurised sprayer at a rate of 24 mg a.i./50 mL water/m². Untreated control sites were included.

** Efficacy:

Application of Fendona 6 SC at 24 mg ai/m2 resulted in 98.9% reduction in black ants after a 7 day experimental period and 100% reduction after 14-28 days. High population reduction was observed in untreated controls as well, i.e. 24%, 31%, 42% and 75% after 7, 14, 21 and 28 days.

Insecticide;	indoor	Fendona 6	Musca domestica	Simulated use	For details on	For details on test	Gibson, D., 2016b;
Control of	application,	SC;	(House fly),	test	Test system /	results see the	DocID#
flying and	surface	Product used	Alphitobius		concentrations	following row	2017/1119573
crawling	treatment	for read	diaperinus (Litter		applied /	marked with **	
insects	(spotted	across. A	beetle), <i>Aedes</i>		exposure see		
	surface	detailed	aegypti		the following		Gibson, D., 2016c;
	treatment	justification	(Mosquitoes);		row *		DocID#
	against flying	for read	adults,				2017_1119306
	insects)	across is	Dermanyssus				
		given below	gallinae (poultry				Accepted studies
		the table	red mite); mixed				
			aged				

* Simulated use trials:

Fendona 1.5 SC PT18

For the crawling test systems experiments were conducted in 1 m x 1 m black plastic arenas. The sides of the arenas were coated in Fluon (liquid PTFE) to prevent the insects/mites from escaping. The floor of the arena was covered in its entirety by plywood/ceramic tiles (plywood/metal/painted plywood for the mites) - one half which were treated, while the other half remained untreated. Tiles were secured to the floor using sticky tape (so that insects/mites were unable to crawl underneath). Test systems were provided with a water source (moistened cotton wool pad) throughout the experimental period. The selection of treated/untreated halves within each test arena was randomised to avoid any potential positional bias. For the flying insects, experiments were conducted within plastic lined chambers with an approximate volume of 30 m³. Treated plywood/ceramic tiles were placed at random around the room; on the floor and attached to the walls, covering an area of approximately 2 m2. Corresponding untreated tiles were also placed at random around the room, covering another 2 m2. The position of the treated/untreated tiles was mixed. Insects were provided with sugar cubes and water (upturned cup resting on cotton-wool wick) placed in each of the four corners of the test room. Fifty flies/mosquitoes were placed in the test room or thirty beetles/fifty mites were placed in the test arena after tile introduction. Knockdown and mortality was assessed over a period of 48 hours at intervals following insect introduction: at 2, 4, 6 and 24 and 48 hours. Dead insects/mites were removed at each assessment. Applications were done by using a hand held 1 L trigger bottle. For flying insects (flies/mosquitoes) the product was applied at a rate of 15 or 30 mg ai per m2 onto 15 x 15 cm ceramic (non-porous) and plywood (porous) surfaces. For the beetles and mites - the product was applied (at a rate of 15 or 30 mg ai per m2) onto 1m² tiled arenas; plywood and ceramic for the beetles, plywood, metal, and painted plywood for the mites. Efficacy was evaluated at 1 day and at 3 months (90 days). Three replicates were conducted for each treatment, for each surface type, for each ageing interval and for each species. Untreated controls were included.

** Efficacy:

Greece

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 15 mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces in a simulated use environment resulted in >98% affected (knocked down and dead) mosquitoes (*Aedes aegypti*), houseflies (*Musca domestica*), and litter beetles (*Alphitobius diaperinus*), after a 24 and 48 hour experimental period. Exposure to the same treatment (1 day Fendona 6 SC 15 mg ai/m²) on plywood/metal/painted plywood surfaces resulted in <18% affected chicken mites, after 24 and 48 hours. Exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 30 mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces in a simulated use environment resulted in >98% affected (knocked down and dead) mosquitoes (*Aedes aegypti*), houseflies (*Musca domestica*), and litter beetles (*Alphitobius diaperinus*), after a 24 and 48 hour experimental period. Exposure to the same treatment (1 day Fendona 6 SC 30 mg ai/m²) on plywood/metal/painted plywood surfaces resulted in <21% affected chicken mites, after 24 and 48 hours.

Exposure to 3 month aged deposits resulted in >80% knock down 2 hours after exposure to the treated porous and non-porous surfaces at 15 and 30 mg ai/m² against mosquitoes, houseflies and litter beetles.

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 15 and 30 mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces in a simulated use environment resulted in <90% dead mosquitoes (*Aedes aegypti*), houseflies (*Musca domestica*), and litter beetles (*Alphitobius diaperinus*), after a 24 and 48 hour experimental period.

Affected houseflies and litter beetles in the untreated control were 0-3.3% for the 24 and 48 hour experimental period. Dead mosquitoes for 1 day and 3 months aged surfaces in the untreated control were 7% and 10%-13.8% for the 24 and 48 hour experimental period, respectively. There are public references that indicate the existence of pyrethroids resistance in chicken red mites. No claim for chicken red mites will be made on the product label.

p. 0 d d 0 t : d 0 0 :											
Insecticide;	indoor	Fendona 6	Blatta orientalis	Laboratory	For details on	For details on test	Gibson, D., 2016d;				
Control of	application,	SC;	(Oriental	study	Test systems /	results see the	DocID#				
flying and	surface	Product used	cockroach),		concentrations	following row	2017_1118835				
crawling	treatment	for read	Blattella		applied /	marked with **					
insects		across. A	germanica		exposure see						

detailed	(German	the following	Gibson, D., 2016e;
justification	cockroach),	row *	DocID#
for read	Musca domestica		2017_1119303
across is	(House fly),		
given below	Alphitobius		Accepted studies
the table	diaperinus (Litter		
	beetle), <i>Aedes</i>		
	aegypti		
	(Mosquitoe),		
	Stomoxys		
	calcitrans (Stable		
	fly, <i>Lasius niger</i>		
	(Garden ant),		
	Dermanyssus		
	gallinae (poultry		
	red mite),		
	Vespula		
	germanica (
	German wasp),		
	Vespula vulgaris		
	(Common wasp)		

* Laboratory bioassays:

Ten insects were confined onto a tile within a plastic pint pot (568 mL), measuring 9 cm in diameter at its base. For the crawling insects – the inside of the pint pot was coated with liquid PTFE (Fluon) to prevent the insects from escaping. Wasps were confined individually onto the surfaces in transparent plastic tubes (4,5 cm diameter, 5 cm high) to prevent infighting. Chicken mites (30 per replicate) were confined within upturned petri dishes measuring 9 cm in diameter. Insects/mites were confined onto the surfaces for a 2 hour period; after 2 hours they were transferred into identical clean plastic containers. Water/sugar water was provided for all test systems after the 2 hour time point (moistened cotton-wool pad), and food was provided where necessary (bran pellet for cockroaches, sugar cube for ants). Assessments of knockdown and mortality were conducted over a period of 48 hours at 1, 2, 4, 6, 24, and 48 hours, post initial exposure to treatments. Applications were done by using a hand held pump-spray. The product was applied at a rate of 15 mg a.i. and at a rate of 30 mg a.i. per m² onto 15 x 15 cm ceramic (non-porous) and plywood (porous) surfaces (plywood/metal/painted plywood for the mites). Efficacy was evaluated at 1 day and at 3 months (90 days) after treatment. Surfaces were stored under ambient conditions prior to use. Four replicates were conducted for each treatment, for each surface type, for each ageing interval and for each species.

** Efficacv:

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC 15 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 100% affected (knocked down and dead) German cockroaches, Oriental cockroaches, Black ants, Mosquitoes (*Aedes aegypti*), House flies, Stable flies and Litter beetles, and 92.5%-100% affected Wasps, after a 24 and 48 hour experimental period, . Two hours of exposure to the same treatment (1 day / 3 month Fendona 6 SC 15 mg a.i./1 m²) on plywood/metal/painted plywood surfaces resulted in <17% affected Chicken mites, after 24 and 48 hours.

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 15 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in <90% dead German cockroaches, Oriental cockroaches and litter beetles, and in >90% dead ants, mosquitoes and

stable flies, after 24 and 48 hours. 1 day aged deposits at 15 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in <90% dead houseflies after 24 hours and >90% dead houseflies after 48 hours, while 3 months aged deposits gave >90% dead houseflies after 24 and 48 hours. 1 day and 3 months aged deposits at 15 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in <90% dead wasps after 24 hours and >90% dead wasps after 48 hours.

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC 30 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 100% affected (knocked down and dead) German cockroaches, Oriental cockroaches, Black ants, Mosquitoes (*Aedes aegypti*), House flies, Stable flies and Litter beetles, and 92.5%-100% affected Wasps, after a 24 and 48 hour experimental period. Two hours of exposure to the same treatment (1 day / 3 month Fendona 6 SC 30 mg a.i./1 m²) on plywood/metal/painted plywood surfaces resulted in <17.5% affected Chicken mites, after 24 and 48 hours.

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 30 mg a.i./1 m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in <90% dead German cockroaches, Oriental cockroaches and litter beetles and in >90% dead ants, mosquitoes, houseflies and stable flies, after 24 and 48 hours. 1 day and 3 months aged deposits at 30 mg a.i./1 m² on plywood (porous) surfaces resulted in <90% dead wasps after 24 hours and >90% dead wasps after 48 hours, and on glazed ceramic (non-porous) surfaces resulted in >90% dead wasps after 24 and 48 hours.

Exposure to 3-month deposits resulted in >90% knock down against German cockroaches, Oriental cockroaches, Black ants, Mosquitoes (*Aedes aegypti*), House flies, Stable flies and Litter beetles after 1 hour exposure after 2 hours exposure to treated porous and non-porous surfaces at 15 and 30 mg a.i./m². Against wasps, exposure to 3-month deposits to porous and non-porous surfaces resulted in >90% knock down 4 hours after treatment at 15 mg a.i./m², and >87.5% knock down 6 hours after treatment at 30 mg a.i./m². Exposure of non-porous surfaces to fresh and 3-month deposits resulted in >90% knock down 1 hour after treatment at 15 and 30 mg a.i./m².

There are public references that indicate the existence of pyrethroids resistance in this pest. No claim for Chicken red mites will be made on the product label.

Affected insects in the untreated controls were 0-15% for all treatments. In the untreated control, the percentage of affected cockroaches in 24 hours for 1-day and 3-months deposits on both types of surfaces were 0% and 3% for German and Oriental cockroaches, respectively. In the untreated control, the percentage of affected (knocked-down + dead) ants in 24 hours for 1-day and 3-months deposits on both types of surfaces was 2.5%. In the untreated control, the percentage of affected (knocked-down + dead) houseflies in 48 hours for 1-day and 3-months deposits on both types of surfaces was 2.5%-7.8%.

In the untreated control, the percentage of dead mosquitoes in 24 hours for 1-day and 3-months deposits was 7.7% on porous surfaces and 10.25% on non-porous surfaces. The results on non-porous surfaces against mosquitoes are not valid due to high mortality in the untreated control. In the untreated control, mortality of litter beetles in 24 and 48 hours for 1-day and 3-months deposits on both types of surfaces was 0%-2.5%. The percentages of dead wasps in 24 hours in the untreated controls were: for fresh (1-day) deposits 7.5% and 15% on non-porous and porous surfaces, respectively; and for 3-month deposits 12.5% and 15% on non-porous and porous surfaces, respectively. The results on porous surfaces with fresh deposits in 24 hours against wasps are not valid due to high mortality in the untreated control. The percentages of dead wasps in 48 hours in the untreated controls were 12.5% - 22.5%, and therefore are considered not acceptable.

Insecticide;	indoor	Fendona 6	Cimex lectularius	Laboratory	For details on	For details on test	Loakes, S., 2011;
Control of	application,	SC;	(Bed bug),	study	Test system /	results see the	DocID#
flying and	surface	Product used	Ctenocephalides		concentrations	following row	2011_1292613
crawling	treatment	for read	felis (Cat flea),		applied /	marked with **	
insects		across. A			exposure see		Not accepted study
		detailed					

justificati	on	the following	
for read		row *	
across is			
given bel	ow		
the table			

*Laboratory bioassay:

Ten insects were confined onto a tile within a plastic ring, measuring 9 cm in diameter at its base. Insects were confined onto the tile for a 1 hour period; after which insects were transferred into clean plastic containers. Treatments were applied onto glazed ceramic tiles, wall paper and fabric tiles for the bed bugs and glazed ceramic tiles, carpet and wood for cat fleas, each measuring 15 cm x 15 cm. Enough surfaces were treated to allow testing at 1 day, 1 month and 3 months. Surfaces were stored under ambient conditions prior to use. Assessments of knockdown and mortality for the bed bugs were made at 1 hour, 1 day, 1 and 2 weeks, and for the fleas at 1 hour, 1 and 2 days, post initial exposure to treatments. The product was applied at 30 mg ai/m2. The rate was equivalent to a rate of 50 mL of solution per m2 (approx. 1.125 g per tile). This solution was prepared with BAS 310 27 I, Fendona 60 g/L alpha-cypermethrin SC diluted 1:98 m/m formulation / water was assessed. Applications were done by using a hand held atomiser. Four replicates were conducted for each treatment, for each surface, for each ageing interval. Untreated controls were included.

** Effects:

Application onto all surface types and all ageing periods resulted in 100% affected (knocked down and dead) bed bugs after 24 hours observation period. Knock down records for bedbugs ranged between 92.5% and 100%, 1 hour post treatment for all treatments. Application onto all surface types and all ageing periods resulted in 95%-100% affected (knocked down and dead) cat fleas after 1 and 2 days observation period. Thus, it can be concluded that the product applied on porous and non-porous surfaces as residual spray at 30 mg a.i./m² is highly effective against *Cimex lectularius* and *Ctenocephalides felis* for 3 months post treatment. In the untreated controls, affected bedbugs were <5% at 24 hours observation period and affected fleas were <25% at 24 and 48 hours, for the 3-month aged surfaces.

Insecticide;	indoor	Fendona 1.5	Musca domestica	Laboratory	For details on	For details on test	Lüpkes, KH., 2011;
Control of	application,	SC	(House fly),	study.	Test system /	results see the	DocID#
flying and	surface		Alphitobius		concentrations	following row	2011_1291553
crawling	treatment		diaperinus (Litter		applied /	marked with **	
insects			beetle),		exposure see		Accepted study
			Stomoxys		the following		,
			calcitrans (Stable		row *		
			fly)				

* Laboratory bioassay:

Flies, 20 at a time, were exposed to the treated surfaces under aluminium rings (diameter 10.5 cm, height 2 cm) with wire gauze (mesh 1 mm), the beetles, 20 at a time, were exposed to the treated surfaces inside talc-powdered glass rings (diameter 9.5 cm, height 5.5 cm). The flies were provided with a sugar water swab. For residual tests the insects were exposed to the treated surfaces at various test intervals, the first time 1 day after treatment, following 42, 84 and 126 days after treatment. Flies were exposed additionally after 182 days, litter beetles additionally after 203 days. The evaluations for knock down (followed by mortality) were made after 15, 30 and 60 minutes, 2, 3, 4, 5, 6, 8, and 24 hours after exposure. For efficacy on still wet surfaces the insects were exposed to the treated surfaces directly after treatment and tested for percentage of knock down (followed by mortality). The evaluation for 100% knock down (followed by mortality) was done permanent up to 2 hours, and also after 24 and 48 hours. Surfaces used were: plywood, concrete and unglazed tiles (flies), PVC, plywood, glazed tiles (litter beetles) (size 15 x 15 cm = 225 cm²). The surfaces are sprayed in a fume hood in which the air extractor can be regulated so that the sprayed jet is unaffected. The formulations are dissolved or suspended in tap water. They are sprayed by the computer-controlled apparatus, which was developed for spraying

insecticide formulations with residual activity on various surfaces: Track Sprayer. Application rates were 15 and 30 mg a.i./m² (flies) and 30 mg a.i./m² (flies) and 30 mg a.i./m² (litter beetles). 3 replicates were conducted. Untreated controls were included.

** Efficacy:

Application onto all surface types and all ageing periods resulted in 100% affected (knocked down and dead) insects. Mortality records after 24 and 48 hours are considered invalid because the insects were exposed permanently to treated surfaces for too long. Nevertheless, 100% knockdown against houseflies and stable flies was recorded within 15-30 minutes after exposure to all types of surfaces (porous and non-porous) aged for 84 days at 15 and 30 mg a.i./m². For litter beetles 100% knockdown was recorded within 15 – 120 minutes after exposure to all types of surfaces (porous and non-porous) aged for 84 days at 30 mg a.i./m². In the untreated controls no knockdown was recorded for the fresh treated surfaces and no mortality was recorded for the aged surfaces in 24 hours measurements.

Insecticide;	indoor	Fendona 1.5	Pheidole	Laboratory	For details on	For details on test	Miller, P.F. & Peters,
Control of	application,	SC	megacephala	study.	Test system /	results see the	B., 1989;
flying and	surface		(Coastal brown		concentrations	following row	DocID#
crawling	treatment		ant)		applied /	marked with **	1989_8000001
insects					exposure see		
					the following		Accepted study
					row *		. ,

* Laboratory bioassay:

Efficacy of the product was assessed in terms of knockdown and residual time. Treatments were applied onto masonite plates. Solutions were sprayed onto 9 cm x 9 plates using a Potter Spray Tower at rates of 7.5, 15, and 30 mg a.i./m². Treated surfaces were aged for 2 and 24 hours, 1 week, 1, 2, and 3 months prior to exposure. Insects were confined onto each surface for a 1 and 3 hours exposure periods. 5 ants were exposed to insecticide on each plate and knockdown was noted after 1 and 3 hours. The knockdown was noted at 1 and 3 hours only, as any increased holding time resulted in unacceptable control mortality. There were four replicates for each treatment. The ants were confined on the plates by means of small plastic rings coated with Fluon. Control treatments consisted of plates which had not been sprayed with insecticide.

** Efficacy:

All treatments gave good knockdown of ants at 3 hours exposure up to 1 month. After the one month assessment, the efficacy of the 7.5 mg a.i./m² application dropped rapidly. The 15 mg a.i./m² application gave good knockdown at 2 months (95%), however, knockdown dropped to 75% at 3 months. The 30 mg a.i./m² application gave good knockdown at 2 months (90%) and 3 months (80%). Control knockdown was low throughout the trial, the highest being 10%.

Insecticide;	indoor	Fendona 1.5	Iridomyrmex	Laboratory	For details on	For details on test	Miller, P.F. & Peters,			
Control of	application,	SC	glaber (Black	study.	Test system /	results see the	B., 1988a;			
flying and	surface		house ant)		concentrations	following row	DocID#			
crawling	treatment				applied /	marked with **	1988_8000003			
insects					exposure see					
					the following		Accepted study			
					row *					

* Laboratory bioassay:

Efficacy of the product was assessed in terms of knockdown and residual time. Treatments were applied onto masonite plates. Solutions were sprayed onto 9 cm x 9 plates using a Potter Spray Tower at rates of 7.5, 15, and 30 mg a.i./m². Treated surfaces were aged for 2 and 24 hours, 1 week, 1, 2, and 3 months prior to exposure. Insects were confined onto each surface for a 1, 3 and 24 hours exposure period. 5 ants were exposed to insecticide on each plate and knockdown was noted after 1 and 3 hours. The knockdown was noted at 1 and 3 hours only, as any

increased holding time resulted in unacceptable control mortality. There were four replicates for each treatment. The ants were confined on the plates by means of small plastic rings coated with Fluon.

** Efficacy:

The 7.5 mg a.i./m² application gave good knockdown up to one week, however, knockdown was poor in the later assessments. The 15 mg a.i./m² application gave 60% knockdown up to 1 month, but efficacy dropped quickly thereafter. The 30 mg a.i./m² gave 75% knockdown up to the 2

111011111 43343311	month assessment, whereas the 5 month assessment was poor.										
Insecticide;	indoor	Fendona 1.5	Periplaneta	Field study	For details on	For details on test	Miller, P.F. & Peters,				
Control of	application,	SC	americana		Test system /	results see the	B., 1988b;				
flying and	crack and		(American		concentrations	following row	DocID#				
crawling	crevice and		cockroach),		applied /	marked with **	1988_8000001				
insects	surface		Periplaneta		exposure see						
	treatment		australasiae		the following		Not accepted study				
			(Australian		row *						
			cockroach)								
			(Nymphs and								
			adults)								

* **Field trial**: Efficacy of the product was assessed in terms of cockroach population reduction. Sticky traps were left out overnight in the different sites to check pre-treatment infestation levels. The cockroach populations were assessed by means of sticky cockroach traps. Three traps were left out at each property and these were always placed in the same location (by fridge, under sink and by stove). The data is expressed as number of cockroaches trapped per household per night. The same assessment method was used on the control properties. Assessment periods were: pre assessment in week prior to treatment, 2 weeks after treatment, 6 weeks after treatment, 4 months after treatment, 6 months after treatment. Each property was visited at each assessment period. The treatment was carried out by a professional pest control company. The treatment consisted of a crack and crevice treatment and surface spray, using a nine litre Nupest Riga. The kitchen in all properties was always treated and other areas where infestation was obvious were also sprayed. All treatments were sprayed at the rate of 1 litre of prepared spray per 20 m² with a dosage of 15 mg a.i/ m². Areas such as stoves, refridgerators and hot water services were dusted with Coopex dust (10g/kg permethrin).

** Efficacy:

The product gave 96.9%, 97.6% and 100% reduction of cockroach population 2 weeks, 6 weeks and 4-6 months, respectively, after treatment. However, the control population decreased during the 4 and 6 month assessment due to winter time. In the control sites, cockroach population was reduced by 9.4% in 2 weeks, increased by 7.5% in 6 weeks and reduced by 21.7% and 38% in 4 and 6 months, respectively. However, a permethrin-based product was used at the same time with Fendona, and therefore it is unclear whether the observed effect was caused only by Fendona.

Insecticide;	indoor	Fendona 1.5	Periplaneta	Simulated use	For details on	For details on test	Gibson, D., 2016f;
Control of	application,	SC; Fendona	americana	test	Test system /	results see the	DocID#
flying and	surface	6 SC -	(American		concentrations	following row	2017/1119575
crawling	treatment	Bridging trial	cockroach),		applied /	marked with **	
insects			Blatella germanica		exposure see		Accepted study
			(German		the following		
			cockroach)		row *		

* Simulated use trials:

Experiments were conducted in 1m x 1m black plastic arenas. The sides of the arenas were coated in Fluon (liquid PTFE) to prevent the cockroaches from escaping. The floor of the arena was covered in its entirety by plywood/ceramic tiles – one half of which was treated, while the other half remained untreated. Tiles were secured to the floor using sticky tape (so that cockroaches were unable to crawl underneath). Test systems were provided with a water source (moistened cotton wool pad), food (bran pellet), and a cardboard harbourage (one in each half) throughout the experimental period. The selection of treated/untreated halves within each test arena was randomised to avoid any potential positional bias. For the untreated control replicates both surface types were placed into the same arena (half plywood, half ceramic). Thirty cockroaches (10 females, 10 males, and 10 nymphs) were released into the test arena after tile introduction. Knockdown and mortality (dead) was assessed at intervals following insect introduction: at 2, 4, 6, 24 and 48 hours. Two products (Fendona 6 SC, and Fendona 1.5 SC) were assessed at 1 day and at 3 months (90 days) after treatment. Both products were applied at a rate of 15 mg ai per m2 onto ceramic (non-porous) and plywood (porous) surfaces using a hand held 1.5L pressurised sprayer (Coopler-Pegler CP 1.5), from a distance of approximately 20 cm. Four replicates were conducted for each treatment.

** Efficacy:

Greece

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC and Fendona 1.5 SC both applied at 15mg ai/1m² on plywood (porous) and glazed ceramic (non-porous) surfaces in a simulated use environment resulted in >97.5% affected (knocked down + dead) German and American cockroaches (*Blatella germanica* & *Periplaneta americana*) after a 24 and 48 hour experimental period. No difference was found between the efficacy of both formulations.

Exposure to 3 month aged deposits of Fendona 6 SC and Fendona 1.5 SC both applied at 15mg ai/1m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 99-100% affected American cockroaches after a 24 hours experimental period.

Exposure to 3 month aged deposits of Fendona 6 SC and Fendona 1.5 SC both applied at 15mg ai/1m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 97.5-100% affected German cockroaches after a 24 hours experimental period.

Exposure to 3 month aged deposits of Fendona 6 SC and Fendona 1.5 SC both applied at 15 mg ai/ 1m^2 on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in >90% knockdown against German and American cockroaches 6 hours post treatment.

Affected insects in the untreated controls were 0-10% for all treatments.

Insecticide; Control of	indoor application,	Fendona 6 SC;	Blatta orientalis (Oriental	Field trial	For details on Test systems /	For details on test results see the	Estany, E., 2016c; DocID#
flying and	crack and	Product used	cockroach)		concentrations	following row	2016_1235738
crawling	crevice	for read	(Nymphs and		applied /	marked with **	Study Code
insects	treatment	across. A	adults)		exposure see		15/166CCC
		detailed			the following		with Addendum:
		justification			row *		DocID 2017/1123697
		for read					
		across is					Not accepted study
		given below					,
		the table					

* Field trial:

Sites with an infestation of Oriental cockroaches, Blatta orientalis, were located, separated from any other infestations. A pre-monitoring assessment was conducted to establish the infestation level at the sites. A number (minimum of 5) of monitoring traps were placed at various locations around the infested sites. The number of cockroaches trapped was recorded over a period of 72 to 96 hours, at 2 days prior to application. The treatment was then applied at the site, according to the sponsor's instructions. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at weekly intervals for a total of 4 to 6 weeks post initial treatment

application. The number of any visible knocked down and dead cockroaches were assessed. Applications were done as crack and crevice treatments by using a pressurised sprayerwand at a rate of 15 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted. The Site 1 had been treated with an unspecified non-professional spray product. No further information available. The site 2 had not been treated in the three months previous to the experimental treatment with Fendona 6 SC. The site 3 was treated with insecticide gel (ABAGEL FORTE; Abamectine: 0.07%, Permethrin: 0.01%) in bait stations, which were removed previously to the study. This study is not valid due to the treatment history sites 1 and 3.

** Efficacy:

Application of Fendona 6 SC at 15 mg a.i. per m² resulted in an average 85.3% reduction in oriental cockroaches after a 4 week period. This average population reduction was reduced due to the conditions in Site 2 where only 59.5% population reduction was recorded 4 weeks post treatment. The risk of re-invasion in Site 2 was deemed high because the area where the premises are located is known to harbour oriental cockroach populations. In addition, it was impossible to obtain 6-week residual data because 2 replicates were disturbed by the property owner. Population reduction of Oriental cockroaches in sites 1 and 3 was 98% and 98.4%, respectively, after a 4-week period (98.2% in average). However, the results of this study are not valid due to the treatment history sites 1 and 3.

HOWEVEL, CHE I	Courts of this of	ady are not van	a due to the treating	crit motory sites	I dild 5.		
Insecticide;	indoor	Fendona 6	Blatta orientalis	Field trial	For details on	For details on test	Estany, E., 2016d;
Control of	application,	SC;	(Oriental		Test systems /	results see the	DocID#
flying and	crack and	Product used	cockroach),		concentrations	following row	2016_1235740
crawling	crevice	for read	Periplaneta		applied /	marked with **	Study Code
insects	treatment	across. A	Americana		exposure see		15/166EEE
		detailed	(American		the following		
		justification	cockroach)		row *		Not accepted study
		for read	(Nymphs and				
		across is	adults)				
		given below					
		the table					

* Field trial:

Sites with an infestation of oriental cockroaches, *Blatta orientalis* and American cockroaches, *Periplaneta americana*, were located, separated from any other infestations. A pre-monitoring assessment was conducted to establish the infestation level at the sites. A number (minimum of 5) of monitoring traps were placed at various locations around the infested sites. The number of cockroaches trapped was recorded over a period of 24 to 72 hours, at 2 days prior to application. The treatment was then applied at the site, according to the sponsor's instructions. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at weekly intervals for a total of 4 weeks post initial treatment application. The number of any visible knocked down and dead cockroaches were assessed. Applications were done as crack and crevice treatments by using a pressurised sprayerwand at a rate of 30 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted (2 for Oriental cockroaches and 1 for American cockroaches).

The site 2 had not been treated with another product three months before treatment with Fendona 6SC, whereas the sites 1 and 3 had been treated with unknown domestic products (no further info is provided) prior to treatment with Fendona 6SC. This study is not valid due to the treatment history in sites 1 and 3.

** Efficacy:

Application of Fendona 6 SC at 30 mg a.i. per m² resulted in an average 94.1% reduction in cockroaches (*B. orientalis* and *P. americana*) after a 4 week period.

Application of Fendona 6 SC resulted in a 99% reduction in oriental cockroach numbers at site 1 relative to pre-treatment levels, after 4 weeks post treatment application. At site 2, application of Fendona 6 SC resulted in a 91% reduction in oriental cockroach numbers after 4 weeks, relative to pre-treatment levels. The maximum percentage reduction achieved at site 2 was 93.2% after 2 weeks post treatment application. Application of Fendona 6 SC resulted in 92.3% reduction in American cockroach numbers at site 3 relative to pre-treatment levels, after 4 weeks post treatment application. However, the results of this study are not valid due to the treatment history in sites 1 and 3.

post treatment	is treatment application. However, the results of this study are not valid due to the treatment history in sites 1 and 5.						
Insecticide;	indoor	Fendona 6	Stomoxys	Field study	For details on	For details on test	Estany, E., 2016e;
Control of	application,	SC;	calcitrans (Stable		Test systems /	results see the	DocID#
flying and	surface	Product used	fly)		concentrations	following row	2016_1235742 with
crawling	spotted	for read			applied /	marked with **	Addendum: DocID
insects	treatment	across. A			exposure see		2017/1121349
		detailed			the following		
		justification			row *		Not accepted study
		for read					
		across is					
		given below					
		the table					

* Field trial:

Greece

Sites with an infestation of stable fly, Stomoxys calcitrans, were located, separated from any other infestations.

A pre-monitoring assessment was conducted to establish the infestation level at the sites. A number (minimum of 10) of monitoring traps were placed at various locations around the infested sites. The number of stable flies trapped was recorded over a period of 48 to 72 hours, at 2 days prior to application. The treatment was then applied at the site, according to the sponsor's instructions. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at intervals 1-3. 4-5, 6-8, 14 and 21 post initial treatment application. The number of any visible knocked down and dead flies were assessed. Applications were done by using a pressurised sprayerwand at a rate of 15 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted.

** Efficacy:

In terms of the corrected percent control achieved, Henderson and Tilton calculations showed that Fendona 6 SC at 15 mg a.i. per m2 provided an average 73.8%, 77% and 80.5% H-T reduction in stable flies' numbers after a 7, 14 and 21 days period respectively. Application of Fendona 6 SC at 15 mg a.i. per m2 at site 1 resulted in a 79.8% and 94% H-T reduction in stable fly numbers after 4 and 21 days post treatment, respectively. At site 2, application of Fendona 6 SC resulted in a 63.8% and 73.6% H-T reduction in stable fly numbers after 7 and 21 days, relative to pre-treatment levels. Secondary re-infestations from outdoors premises (animal housing, etc.) at this site should be presumed, since only the milking room and adjacent sheltered areas were treated. Application of Fendona 6 SC resulted in a 73.2% and 73.9% H-T reduction in stable fly numbers at site 3 relative to pre-treatment levels at 3 and 21 days post treatment respectively.

Insecticide;	indoor	Fendona 6	Stomoxys	Field study	For details on	For details on test	Estany, E., 2016f;
Control of	application,	SC;	calcitrans (Stable		Test systems /	results see the	DocID#
flying and	surface	Product used	fly)		concentrations	following row	2016_1235746
crawling	spotted	for read			applied /	marked with **	
insects	treatment	across. A			exposure see		Not accepted study
		detailed			the following		
		justification			row *		
		for read					
		across is					

given below			
the table			

* Field trial:

Sites with an infestation of stable fly, Stomoxys calcitrans, were located, separated from any other infestations.

A pre-monitoring assessment was conducted to establish the infestation level at the sites. A number (minimum of 10) of monitoring traps were placed at various locations around the infested sites. The number of stable flies trapped was recorded over a period of 48 to 72 hours, at 2 days prior to application. The treatment was then applied at the site, according to the sponsor's instructions. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at intervals 1-3. 4-5, 6-8, 14 and 21 post initial treatment application. The number of any visible knocked down and dead flies were assessed. The number of any visible knocked down and dead flies were assessed. Applications were done by using a pressurised sprayerwand at a rate of 30 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted.

** Efficacy:

In terms of the corrected percent control achieved, Henderson and Tilton calculations showed that Fendona 6 SC at 30 mg a.i. per m2 provided an average 80.1%, 62.2% and 71.4% H-T reduction in stable flies' numbers after a 7, 14 and 21 day period respectively. Application of Fendona 6 SC at 30 mg a.i. per m2 at site 1 provided an H-T reduction in stable fly numbers over 80% throughout the trial. It resulted in an 80.4%, 97.2% and 97.3% H-T reduction in stable fly numbers after 2, 7 and 21 days post treatment, respectively. At site 2, application of Fendona 6 SC resulted in a 57.4%, 65.6% and 51.1% H-T reduction in stable fly numbers after 3, 7 and 21 days post treatment, respectively. Secondary re-infestation from adjacent outdoor premises could be presumed responsible for the poorer product performance at this site. Application of Fendona 6 SC resulted in a 26.1%, 77.4% and 65.7% H-T reduction in stable fly numbers at site 3 relative to pre-treatment levels at 3, 7 and 21 days post treatment, respectively.

Insecticide;	indoor	Fendona 6	Lasius niger	Field trial	For details on	For details on test	Gibson, D., 2016g;
Control of	application,	SC;	(Garden ant)		Test system /	results see the	DocID#
flying and	crack and	Product used			concentrations	following row	2016_1235734
crawling	crevice	for read			applied /	marked with **	Study Code 15/166C
insects	treatment	across. A			exposure see		
		detailed			the following		Gibson, D., 2016h;
		justification			row *		DocID#
		for read					2016_1235736
		across is					Study Code 15/166D
		given below					
		the table					Accepted studies

* Field trial:

Each site was observed to determine areas of ant activity near a nest. The number of ants present in a specific area (1 m²) was assessed. For each site the area of ant activity assessed was marked with spray paint at the corners and the treatment was then applied. The number of ants present was assessed in the same manner as for the pre-treatment, at 2, 7, 14, 21 and 28 days post treatment. Applications were done as spotted treatments by using a pressurised sprayer (Cooper-Pegler CP1.5) which had an adjustable hollow-cone nozzle set at a rate of 15 mg a.i./m² and at a rate of 30 mg a.i./m² in 5L solution per 100 m². 3 replicates were conducted. Three untreated control sites were included.

** Efficacy:

Application of Fendona 6 SC at 15 and 30 mg a.i./m² resulted in 93.3% and 97.8% reduction in black ants, respectively, after a 28 day experimental period. No population reduction was recorded in untreated control sites.

It can be concluded that Fendona 6 SC applied at 15 and 30 mg a.i./m² is effective against black ants, in terms of population reduction after a 28 day experimental period.

Insecticide; Control of flying and crawling	indoor application, surface treatment	Fendona 6 SC; Product used for read	Mosquitoes Culex quinquefasciatus(Mixed sex and	Laboratory study	For details on Test systems / concentrations applied /	For details on test results see the following row marked with **	Gibson, 2017a DocID# 2017/1223401
insects		across. A detailed justification for read across is given below the table	aged adults)		exposure see the following row *		Accepted study

* Laboratory bioassays:

Ten mosquitoes were confined onto a tile within a transparent plastic pint pot (568 mL capacity), measuring 9 cm in diameter at its base (see Plate 1), for a 2 hour period; after 2 hours they were transferred into identical clean plastic containers. Sugar water was provided for all test systems after the 2 hour time point (moistened cotton-wool pad).

Temperature and relative humidity was maintained at appropriate levels with respect to insect biology and dial cycle. Temperature ranged from 21.9°C- 26.2°C and relative humidity ranged from 43.1% - 75.0%.

The product was applied at a rate of 15 mg a.i. per m² onto 15x15cm ceramic (non-porous) and plywood (porous) surfaces, using a hand held pump-spray, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and at 3 months (90 days). Surfaces were stored under ambient conditions prior to use. Four replicates were conducted for each treatment and for the control. Assessments of knockdown and mortality were conducted at 1, 2, 4, 6, 24, and 48 hours, post initial exposure to treatments. Moribound, live or dead mosquitoes were counted and compared with the pretreatment values. Untreated controls were included.

** Efficacy:

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC 15mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 97.2% mortality on plywood, and 100% mortality on ceramic tiles (fresh residues) at 24 hours after exposure; and 91.9% mortality on plywood and 100% mortality on ceramic tiles (3-month residues) at 24 hours after exposure. 100% dead mosquitoes (*Culex quinquefasciatus*) on both surfaces were observed after a 48 hour experimental period. 100% knockdown was recorded after two hours of exposure to the treated surfaces in all treatments.

In the untreated controls, mortality was 2.5%-7.5% and 5%-10% in 24 and 48 hours after exposure, respectively.

It can be concluded that Fendona 6 SC applied at 15mg ai/m² was highly effective against mosquitoes (*Culex quinquefasciatus*) in terms of knock-down and mortality, when applied as a residual treatment onto porous and non-porous surfaces, for up to 3 months.

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Insecticide;	indoor	Fendona 6	Mosquitoes	Laboratory	For details on	For details on test	Gibson, 2017b
Control of	application,	SC;	Culex	study	Test systems /	results see the	DocID#
flying and	surface	Product used	quinquefasciatus		concentrations	following row	2017/1223402
crawling	treatment	for read	(Mixed sex and		applied /	marked with **	
insects		across. A	aged adults)		exposure see		Accepted study
		detailed					

justification	the	e following	
for read	row	N *	
across is given below the table			

* Laboratory bioassays:

Ten mosquitoes were confined onto a tile within a transparent plastic pint pot (568 mL capacity), measuring 9 cm in diameter at its base (see Plate 1), for a 2 hour period; after 2 hours they were transferred into identical clean plastic containers. Sugar water was provided for all test systems after the 2 hour time point (moistened cotton-wool pad).

Temperature and relative humidity was maintained at appropriate levels with respect to insect biology and dial cycle. Temperature ranged from 21.9°C- 26.2°C and relative humidity ranged from 43.1% - 75.0%.

The product was applied at a rate of 30 mg a.i. per m² onto 15x15cm ceramic (non-porous) and plywood (porous) surfaces, using a hand held pump-spray, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and at 3 months (90 days). Surfaces were stored under ambient conditions prior to use. Four replicates were conducted for each treatment and for the control. Assessments of knockdown and mortality were conducted at 1, 2, 4, 6, 24, and 48 hours, post initial exposure to treatments. Moribound, live or dead mosquitoes were counted and compared with the pretreatment values. Untreated controls were included.

** Efficacy:

Two hours of exposure to 1 day and 3 month aged deposits of Fendona 6 SC 30mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in 97.2% mortality on plywood, and 100% mortality on ceramic tiles (fresh residue) at 24 hours after exposure; and 86.9% mortality on plywood and 92.5% mortality on ceramic tiles (3-month residues) at 24 hours after exposure. 100% dead mosquitoes (*Culex quinquefasciatus*) were observed on both surfaces after a 48 hour experimental period. 100% knockdown was recorded after two hours of exposure to the treated surfaces in all treatments.

In the untreated controls, mortality was 2.5%-7.5% and 5%-10% in 24 and 48 hours after exposure, respectively. In the untreated control on 3-month aged plywood surfaces, at 48 hours mortality was 5%.

It can be concluded that Fendona 6 SC applied at 30 mg ai/m² was highly effective against mosquitoes (*Culex quinquefasciatus*) in terms of knock-down and mortality, when applied as a residual treatment onto porous and non-porous surfaces, for up to 3 months.

Insecticide;	indoor	Fendona 6	Mosquitoes	Simulated use	For details on	For details on test	Gibson, 2018a
Control of flying and	application, surface	SC; Product used	Culex quinquefasciatus	test	Test systems / concentrations	results see the following row	DocID# 2017/1223403
crawling insects	spotted treatment	for read across. A	Culex pipiens (Mixed sex and		applied / exposure see	marked with **	Accepted study
	ti ddeirione	detailed justification for read	aged adults)		the following row *		recepted stady
		across is given below the table					

*Sim.Use trial:

The product was applied at a rate of 15mg a.i. per m² onto 15cm x 15cm ceramic and plywood surfaces. Enough tiles were treated to cover a total area of 2m². Treatments were applied using a hand held 1L trigger bottle, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and 3 months (90 days) post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were conducted in plain white rooms ($510 \text{cm} \times 240 \text{cm} \times 240 \text{cm}$) within plastic lined chambers with an approximate volume of 30m^3 . Treated plywood/ceramic tiles were placed at random around the room; on the floor and attached to the walls; covering an area of approximately 2m^2 . Corresponding untreated tiles were also placed at random around the room, covering another 2m^2 . The position of the treated/untreated tiles was mixed. Mosquitoes were provided with sugar-water (plastic sugar-water wells, with a cotton-wool wick) placed in each of the four corners of the test room.

Culex pipiens were used for the 3 month tests because the required numbers of *Culex quinquefasciatus* mosquitoes were not available from suppliers in sufficient quantity to meet with testing deadlines on aged surfaces.

Fifty mosquitoes were introduced into the test arenas immediately following surface introduction. Assessments of knockdown and mortality were carried out at 2, 4, 6, 24 and 48 hours post insect introduction. 4 replicates were performed for each treatment.

Both temperature and relative humidity were maintained at appropriate levels (20° C $\pm 5^{\circ}$ C, 20-80 % RH), and the rooms were set to an approximate 12:12 light: dark dial cycle.

** Efficacv:

Exposure to residual deposits of Fendona 6 SC 15mg ai/ m^2 in a simulated use environment, resulted in 82% and 84% affected (knock down + dead) mosquitoes (*Culex quinquefasciatus*) on 1 day aged porous surfaces 24 and 48 hours post treatment, respectively, and 89.5% and 92% affected (knock down + dead) mosquitoes (*Culex quinquefasciatus*) on 1 day aged non-porous surfaces 24 and 48 hours post treatment, respectively.

Exposure to residual deposits of Fendona 6 SC 15mg ai/m², resulted in 81% and 84% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged porous surfaces 24 and 48 hours post treatment, respectively, and 81.5% and 83% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged non-porous surfaces 24 and 48 hours post treatment, respectively.

Exposure to fresh (1 day) deposits of Fendona 6 SC at 15 mg ai/m² on porous and non-porous surfaces resulted in <90% dead mosquitoes (*Culex quinquefasciatus*) in 24 hours post treatment, however in 48 hours the treatment on non-porous surfaces resulted in >90% dead mosquitoes (*Culex quinquefasciatus*).

Less than 80% knockdown was recorded after two to six hours of exposure to the treated surfaces in all treatments.

In the untreated controls affected insects were 0-11%. For the fresh deposits on both types of surfaces in the untreated control, mortality was <10% in 24 hours.

Insecticide;	indoor		Mosquitoes	Simulated use	For details on	For details on test	Gibson, 2018b
Control of	application,	SC;	Culex	test	Test systems /	results see the	
flying and	surface	Product used	quinquefasciatus		concentrations	following row	
crawling	spotted	for read	Culex pipiens		applied /	marked with **	DocID#
insects	treatment	across. A	(Mixed sex and		exposure see		2017/1223404
		detailed	aged adults)		the following		
		justification			row *		Accepted study
		for read					, ,
		across is					

given below the table			
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*Sim.Use trial:

The product was applied at a rate of 30mg a.i. per m² onto 15cm x 15cm ceramic and plywood surfaces. Enough tiles were treated to cover a total area of 2m². Treatments were applied using a hand held 1L trigger bottle, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and 3 months (90 days) post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were conducted in plain white rooms ($510 \text{cm} \times 240 \text{cm} \times 240 \text{cm}$) within plastic lined chambers with an approximate volume of 30m^3 . Treated plywood/ceramic tiles were placed at random around the room; on the floor and attached to the walls; covering an area of approximately 2m^2 . Corresponding untreated tiles were also placed at random around the room, covering another 2m^2 . The position of the treated/untreated tiles was mixed. Mosquitoes were provided with sugar-water (plastic sugar-water wells, with a cotton-wool wick) placed in each of the four corners of the test room.

Culex pipiens were used for the 3 month tests because the required numbers of Culex quinquefasciatus mosquitoes were not available from suppliers in sufficient quantity to meet with testing deadlines on aged surfaces.

Fifty mosquitoes were introduced into the test arenas immediately following surface introduction. Assessments of knockdown and mortality were carried out at 2, 4, 6, 24 and 48 hours post insect introduction.

Both temperature and relative humidity were maintained at appropriate levels (20° C $\pm 5^{\circ}$ C, 20-80 % RH), and the rooms were set to an approximate 12:12 light: dark dial cycle.

** Efficacy:

Exposure to residual deposits of Fendona 6 SC 30mg ai/m² in a simulated use environment, resulted in 89.5% and 92% affected (knock down + dead) mosquitoes (*Culex quinquefasciatus*) on 1 day aged porous surfaces 24 and 48 hours post treatment, respectively, and 89.5% and 93.5% affected (knock down + dead) mosquitoes (*Culex quinquefasciatus*) on 1 day aged non-porous surfaces 24 and 48 hours post treatment, respectively.

Exposure to residual deposits of Fendona 6 SC 30mg ai/ m^2 , resulted in 86% and 88.5% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged porous surfaces 24 and 48 hours post treatment, respectively, and 87.5% and 89% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged non-porous surfaces 24 and 48 hours post treatment, respectively.

Exposure to fresh (1 day) deposits of Fendona 6 SC at 30 mg ai/m² on porous and non-porous surfaces resulted in <90% dead mosquitoes (*Culex quinquefasciatus*) in 24 hours post treatment, however in 48 hours the treatment on non-porous and porous surfaces resulted in >90% dead mosquitoes (*Culex quinquefasciatus*).

Less than 80% knockdown was recorded after two to six hours of exposure to the treated surfaces in all treatments.

In the untreated controls affected insects were 0-11%. For the fresh deposits on both types of surfaces in the untreated control, mortality was <10% in 24 hours.

Insecticide;	indoor	Fendona 6	Bed bugs	Field study	For details on	For details on test	Foltan, 2017
Control of	application,	SC;	Cimex lectularius		Test systems /	results see the	DocID#
flying and	crack and	Product used	(Nymphs and		concentrations	following row	2017/1223408
crawling	crevice	for read	adults)		applied /	marked with **	
insects		across. A	addits)		exposure see		Accepted study
		detailed					

justificati	on	the following	
for read		row *	
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the table			

* Field trial:

Test sites consisting of individual flats with an infestation of bed bugs, *Cimex lectularius*, were located in the vicinity of Ceske Budejovice, Czech Republic. Ten test sites infested with *Cimex lectularius* were used for the trial. Only test sites with no previous treatment against the target species or any other arthropod pest in the last 60 days pre-treatment, were used in the study. Percentage product efficacy was calculated as percentage reduction of live bed bugs present at the test site after treatment in comparison to the pre-treatment assessment. Five of the sites were treated with 15 mg ai/50 ml water/m². 5 sites were treated with 30 mg ai/50 ml water/m². 2 applications were done 2 weeks apart. Parameters evaluated included: live or dead bed bugs, and cast skins; blood spotting on the sheets, along the mattress seams and other places where bed bugs hide; eggs, which tend to be laid in crevices in dark areas, and bed bug smell. The above parameters were recorded before treatment and at 2, 4, 8 and 14 weeks after application.

** Efficacv:

Following the first application of Fendona 6SC, the number of live bed bugs was reduced by $88.4 \pm 3.2 \%$ after application at 30mg ai/m² and by $77.4 \pm 11.3 \%$ after treatment at 15 mg ai/m², two weeks post treatment Both application rates (30 and 15 mg ai/m²) resulted in 100% control of the bed bug populations following the second application, in 4 weeks up to 14 weeks after the first application. The results show that the product has a strong efficacy against bed bugs (*Cimex lectularius*).

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Control of flying and	application, surface treatment	SC; Product used for read	Bed bugs Cimex lectularius Cat fleas Ctenocephalides felis (Mixed sex and aged adults)	Laboratory study	For details on Test systems / concentrations applied / exposure see the following row *	For details on test results see the following row marked with **	Gibson, 2017c DocID# 2017/1223405 Accepted study

*Lab trial:

The product was applied at a rate of 15mg a.i. per m² onto 15x15cm ceramic, plywood and carpet surfaces for the fleas; and ceramic, wallpaper and cotton fabric surfaces for the bed bugs. Treatments were applied using a hand held pump-spray, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day, 1 month and 3 months (90 days) post treatment. There were 4 replicates per treatment. Surfaces were stored under ambient conditions prior to use.

Ten fleas / bed bugs were confined onto a tile within a transparent plastic petri dish, measuring 90mm in diameter. Fleas were confined onto the tiles for a 2 hour period, and bed bugs were confined for a 6 hour period; after the confinement period (2 / 6 hours) insects were transferred into clean plastic holding containers (petri dishes with a glass tile lid) and provided with a moistened cotton-wool pad to maintain a high humidity environment. Temperature and relative humidity was maintained at appropriate levels with respect to insect biology and dial cycle.

Assessments of knockdown and mortality were conducted at at 1, 2, 6, 24, and 48 hours, and at 1 and 2 weeks post initial exposure to treatments for the bed bugs; and for the fleas at 1, 2, 24 and 48 hours post initial exposure to treatments.

**Efficacy:

Bed bugs (Cimex lectularius)

Six hours of exposure to 1 day, 1 month and 3 month aged deposits of Fendona 6 SC 15mg ai/1m² on glazed ceramic, wallpaper and cotton fabric surfaces resulted in >95% affected (knocked-down & dead) bed bugs (*Cimex lectularius*) after a 24 hour experimental period; This cumulated in >92.5% mortality on all surfaces after 1 week post treatment (92.5% on cotton fabric and 100% on ceramic and wallpaper). Six hours post exposure 95-100% knock down was recorded in the 3-month aged deposits. For 1-day, 1-month and 3-month deposits against bedbugs on porous and non-porous surfaces the mortality in the untreated control was 0-7.5%, 1 hour to 1 week after exposure.

Cat Fleas (Ctenocephalides felis)

Two hours of exposure to 1 day, 1 month and 3 month aged deposits of Fendona 6 SC 15mg ai/1m² on glazed ceramic and plywood surfaces resulted in >97.5% affected (knocked-down + dead) fleas after a 24 hour experimental period, and >95% dead fleas (*Ctenocephalides felis*) after a 48 hour experimental period. Mortality after exposure to 3-months deposits on ceramic surfaces was 95% in 24 hours, on plywood 52.5% in 24 hours and 95% in 48 hours, and on carpets 25% in 24 hours and 85% in 48 hours.

Fendona 6 SC was less effective when applied on carpet surfaces; two hours of exposure to 3 month aged deposits on carpet surfaces resulted in 82.5% affected (knocked-down + dead) fleas after a 24 hour experimental period and 85% dead fleas (*Ctenocephalides felis*) after a 48 hour experimental period.

In the untreated control mortality was 0-17.5%. For 1-day, 1-month and 3-month deposits against fleas on porous and non-porous surfaces (except for carpets) the mortality in the untreated control was 5-7.5%, 24 hours after exposure. For the 3-month deposits against fleas mortality in the untreated control was 7.5% and 15% on ceramic surfaces in 24 hours and 48 hours, 7.5% and 17.5% on plywood, and 15% and 17.5% on carpets, respectively.

Insecticide;	indoor	Fendona 6	Cat fleas,	Simulated use		For details on test	Gibson, 2017d
Control of flying and crawling insects	application, surface treatment (in support of	SC; Product used for read across. A	Ctenocephalides felis (Mixed sex and	test	Test systems / concentrations applied / exposure see	results see the following row marked with **	(interim report) DocID# 2017/1223406
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	spot, crack and crevice treatment)	detailed justification for read across is	aged adults)		the following row *		Accepted study
		given below the table					

*Simulated use trial:

The product was applied at a rate of 15mg a.i. per m² onto 0.5m x 1m ceramic, plywood and carpet surfaces.

Treatments were applied using a hand held pump-spray, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day, 1 month and 3 months (90 days) post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were carried out within $1m \times 1m$ arenas; half of the floor-space $(1m \times 0.5m)$ was covered in treated surfaces, whilst the remaining half contained untreated surfaces. Each arena was 0.5m deep (in order to prevent the fleas from jumping out and escaping) and lined with plastic sheeting. Fleas were provided with a moistened cotton-wool pad (located on both treated and untreated surfaces). The selection of treated / untreated halves within each test arena was also randomised (in order to prevent any positional bias). Twenty fleas were introduced, centrally,

into the test arenas following surface introduction. Assessments of knockdown and mortality were carried out at 24 and 48 hours post insect introduction. Four replicates (4) were conducted for each treatment. Temperature and relative humidity were maintained at appropriate levels with respect to flea biology and dial cycle.

**Efficacy:

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC 15mg ai/m² on glazed ceramic and plywood surfaces resulted in >90% affected (Knocked down + dead) cat fleas after a 48 hour experimental period. Fendona 6 SC was less effective when applied on carpet surfaces; with exposure to 1 day and 3 month aged deposits on carpet resulting in 83.75% and 70% affected fleas, respectively, after 48 hours. Exposure to 3 month aged deposits of Fendona 6 SC 15mg ai/m² on glazed ceramic, plywood and carpet surfaces resulted in 92.5%, 87.5% and 63.75 affected (Knocked down + dead) cat fleas after a 24 hour experimental period.

Exposure to 1 day and 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² resulted in <90% dead Cat fleas (*Ctenocephalides felis*), 48 hours after exposure to treated plywood (porous), carpet (porous) and ceramic glazed (non-porous) surfaces.

In the untreated control mortality was 7.5- 15% on porous and non-porous surfaces after 48 hoursFor 1-day and 3-month deposits against fleas on porous and non-porous surfaces (except for carpets) the mortality in the untreated control was 3.75-6.25%, 24 hours after exposure.

on porous and i	r porous and non porous surfaces (except for earpeis) the mortality in the untreated control was 5.7.5 0.25 %, 24 hours after exposure.										
Insecticide;	indoor	Fendona 6	Cat fleas,	Simulated use	For details on	For details on test	Gibson, 2017e				
Control of flying and crawling insects	application, surface treatment (in support of	SC; Product used for read across . A detailed	Ctenocephalides felis (Mixed sex and aged adults)	test	Test systems / concentrations applied / exposure see the following	results see the following row marked with **	(interim report) DocID# 2017/1223407 Accepted study				
	spot, crack and crevice treatment)	justification for read across is given below the table	,		row *		Accepted study				

*Simulated use trial:

The product was applied at a rate of 30mg a.i. per m^2 onto 0.5m x 1m ceramic, plywood and carpet surfaces.

Treatments were applied using a hand held pump-spray, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day, 1 month and 3 months (90 days) post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were carried out within $1m \times 1m$ arenas; half of the floor-space $(1m \times 0.5m)$ was covered in treated surfaces, whilst the remaining half contained untreated surfaces. Each arena was 0.5m deep (in order to prevent the fleas from jumping out and escaping) and lined with plastic sheeting.

Fleas were provided with a moistened cotton-wool pad (located on both treated and untreated surfaces). The selection of treated / untreated halves within each test arena was also randomised (in order to prevent any positional bias). Twenty fleas were introduced, centrally, into the test arenas following surface introduction. Assessments of knockdown and mortality were carried out at 24 and 48 hours post insect introduction. Knockdown was defined as the inability of the pest to upright itself or make coordinated movements and mortality was defined as the immobility of the pest when gently prodded / agitated. Four replicates (4) were conducted for each treatment. Temperature and relative humidity were maintained at appropriate levels with respect to flea biology and dial cycle.

** Efficacy

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC 30mg ai/m² on glazed ceramic and plywood surfaces resulted in >90% affected (Knocked down + dead) cat fleas after a 48 hour experimental period. Fendona 6 SC was less effective when applied on carpet surfaces; with exposure to 1 day and 3 month aged deposits on carpet resulting in 82.5% and 77.5% affected fleas, respectively, after 48 hours. Exposure to 1 day and 3 months deposits on porous and non-porous surfaces at 30 mg a.i./m² resulted in <90% dead Cat fleas (*Ctenocephalides felis*), 48 hours after exposure to treated plywood (porous) and carpet (porous) surfaces and >90% dead insects on ceramic glazed (non-porous) surfaces.

In the untreated control mortality was 7.5-15% on porous and non-porous surfaces after 48 hours (10% and 12.5% on non-porous surfaces for 1 day and 3 month deposits). For 1-day and 3-month deposits against fleas on porous and non-porous surfaces (except for carpets) the mortality in

the untreated control was 3.75-6.25%, 24 hours after exposure.

the untileated co	the unitedated control was 5.75 6.25 %, 24 hours after exposure.									
Control of flying and crawling	application, surface spotted treatment	SC; Product used for read across . A detailed	Houseflies Musca domestica Stable flies Stomoxys calcitrans	Field study	For details on Test systems / concentrations applied / exposure see the following row *	For details on test results see the following row marked with **	Latorre, 2017a DocID# 2017/1223410 Not accepted study			

*Field trial:

Four test sites infested with both species of flies (*Musca domestica*) and (*Stomoxys calcitrans*) were used for the trial. A pre-monitoring assessment was conducted to establish the infestation level at four test sites. The area to be treated was the 50% of the total of the site considering for the calculation the floor, ceiling, walls and partitions. The floor was not treated and the application focused on places were flies congregate like pipes, window frames and barns partitions. A further set of monitoring traps were placed at the same location as for the premonitoring assessment, and assessed at intervals approximately 1-3, 4-6, 7-8, 14, 21, 30, 45, 60, 75 and 90 days post initial treatment application. One untreated control (no product applied) site was assessed concomitantly as the treated ones to monitor natural population fluctuations due to natural causes and compare those with the effect of the product applied on treated sites. To ensure that no treatment could affect the natural fluctuation of flies, untreated site was chosen where owners ensured that they were not using or planning to use any insecticidal products.

** Efficacy:

In terms of the corrected percent control achieved, Henderson and Tilton calculations showed that Fendona 6 SC at 15 mg a.i. per m^2 , that is equal to 25 mL product in 5 L to treat 100 m^2 or 0.5% v/v, in terms of population reduction over a 90 day experimental period, provided an average for house flies of 39.4% population reduction during the first month, 43.8% during the second month and 49.1% during the third month. In stable flies, the average population reduction was of 28.4% during the first month, 30.7% during the second month and 37.9% during the third month.

Insecticide;	indoor	Fendona 6	Houseflies	Field study	For details on	For details on test	Latorre, 2017b
Control of	application,	SC;	Musca domestica		Test systems /	results see the	DocID#
flying and	surface	Product used			concentrations	following row	2017/1223411
		for read			applied /	marked with **	

crawling spotted treatment	across. A detailed stomoxys justification for read across is given below the table Stable flies stomoxys calcitrans	exposure see the following row *	Not accepted study
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*Field trial:

Four test sites infested with both species of flies (Musca domestica) and (Stomoxys calcitrans) were used for the trial. A pre-monitoring assessment was conducted to establish the infestation level at four test sites. The area to be treated was the 50% of the total of the site considering for the calculation the floor, ceiling, walls and partitions. The floor was not treated and the application focused on places were flies congregate like pipes, window frames and barns partitions. A further set of monitoring traps were placed at the same location as for the pre-monitoring assessment, and assessed at intervals approximately 1-3, 4-6, 7-8, 14, 21, 30, 45, 60, 75 and 90 days post initial treatment application. One untreated control (no product applied) site was assessed concomitantly as the treated ones to monitor natural population fluctuations due to natural causes and compare those with the effect of the product applied on treated sites. To ensure that no treatment could affect the natural fluctuation of flies, untreated site was chosen where owners ensured that they were not using or planning to use any insecticidal products.

**Efficacy:

In terms of the corrected percent control achieved, Henderson and Tilton calculations showed that, despite the heavy re-invasion reported in 2 out of the 4 replicates, Fendona 6 SC at a rate of 30 mg a.i. per m^2 , what corresponds to 50 mL of product diluted in 5 L of water to treat 100 m^2 or 1% v/v, , in terms of population reduction over a 90 day experimental period, provided an average for house flies of 31.7% population reduction during the first month, 33.2% during the second month and 24.2% during the third month. In stable flies, the population reduction was of 37.8% during the first month, 31.4% during the second month and 50.9% during the third month.

Insecticide; Control of flying and crawling	indoor application, surface spotted	Fendona 6 SC; Product used for read	Wasps Vespula germanica / Vespula vulgaris	Simulated use test	For details on Test systems / concentrations applied /	For details on test results see the following row marked with **	Gibson, 2018c (final report)
insects	treatment	across. A detailed justification for read across is given below the table	(Mixed population)		exposure see the following row *		Accepted study

*Simulated use trial:

The product was applied at a rate of 15mg a.i. per m² onto 15cm x 15cm ceramic and plywood surfaces. Enough tiles were treated to cover a total area of 2m². Treatments were applied using a hand held 1L trigger bottle, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and 3 months post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were conducted in plain white rooms (510cm x 240cm x 240cm) within plastic lined chambers with an approximate volume of 30m³. Treated plywood/ceramic tiles were placed at random around the room; on the floor and attached to the walls; covering an area of approximately 2m². Corresponding untreated tiles were also placed at random around the room, covering another 2m². The position of the treated/untreated tiles was mixed. Wasps were provided with sugar-water (plastic sugar-water wells, with a cotton-wool wick) placed in each of the four corners of the test room.

Twenty wasps were introduced into the test arenas immediately following surface introduction. Assessments of knockdown and mortality were carried out at 2, 4, 6, 24 and 48 hours post insect introduction. Four replicates were performed with treatments on plywood and ceramic surfaces, respectively.

Both temperature and relative humidity were maintained at appropriate levels, and the rooms were set to an approximate 12:12 light: dark dial cycle.

** Efficacy:

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC 15mg ai/1m² on glazed ceramic (non-porous) surfaces, in a simulated use environment, resulted in 100% and 93.5% dead wasps (*Vespula* spp.) after a 24 hour experimental period, respectively. Knock down was >90% after exposure for 6 hours on glazed ceramic surfaces.. In the untreated control on non-porous and porous surfaces mortality was 7.5% in 24 hours.

Exposure to 1 day aged deposits of Fendona 6 SC 15mg ai/1m² on plywood (porous) surfaces, in a simulated use environment, resulted in 93.5% dead wasps (*Vespula* spp.) after a 24 hour experimental period. Exposure to 3 months aged deposits of Fendona 6 SC 15mg ai/1m² on plywood (porous) surfaces resulted in 77.5% and 90.6% dead wasps (*Vespula* spp.) after a 24 and 48 hour experimental period, respectively.

Knock down was <90% after exposure for 2-6 hours to 1 day and 3 months aged treated plywood surfaces.

In the untreated control on porous surfaces mortality was 10% and 20% in 24 and 48 hours, respectively.

The results on the porous surfaces are not valid due to the low knockdown values with the 1 day and 3 months deposits and the high mortality in the untreated control.

Insecticide; Control of flying and crawling insects	indoor application, surface spotted treatment	Fendona 6 SC; Product used for read across . A detailed justification for read across is given below the table	Wasps Vespula germanica / Vespula vulgaris (Mixed population)	Simulated use test	For details on Test systems / concentrations applied / exposure see the following row *	For details on test results see the following row marked with **	Gibson, 2018d (final report) Accepted study

*Simulated use trial:

The product was applied at a rate of 30 mg a.i. per m² onto 15cm x 15cm ceramic and plywood surfaces. Enough tiles were treated to cover a total area of 2m². Treatments were applied using a hand held 1L trigger bottle, from a distance of approximately 20cm. The deposited amount per surface was recorded by weighing the spray bottle before and after application. Enough surfaces were treated to allow testing at 1 day and 3 months post treatment. Surfaces were stored under ambient conditions prior to use.

Experiments were conducted in plain white rooms ($510 \text{cm} \times 240 \text{cm} \times 240 \text{cm}$) within plastic lined chambers with an approximate volume of 30m^3 . Treated plywood/ceramic tiles were placed at random around the room; on the floor and attached to the walls; covering an area of approximately

2m². Corresponding untreated tiles were also placed at random around the room, covering another 2m². The position of the treated/untreated tiles was mixed. Wasps were provided with sugar-water (plastic sugar-water wells, with a cotton-wool wick) placed in each of the four corners of the test room.

Twenty wasps were introduced into the test arenas immediately following surface introduction. Assessments of knockdown and mortality were carried out at 2, 4, 6, 24 and 48 hours post insect introduction. Four replicates were performed for each treatment.

Both temperature and relative humidity were maintained at appropriate levels, and the rooms were set to an approximate 12:12 light: dark dial cycle.

**Efficacy:

Exposure to 1 day and 3 month aged deposits of Fendona 6 SC 30mg ai/m² on glazed ceramic (non- porous) surfaces, in a simulated use environment, resulted in 100% and 97.5% dead wasps (*Vespula* spp.) after a 24 hour experimental period, respectively. Knock down was >90% after exposure for 6 hours on glazed ceramic surfaces. In the untreated control on non-porous mortality was 7.5% in 24 hours. Exposure to 1 day aged deposits of Fendona 6 SC 30mg ai/1m² on plywood (porous) surfaces, in a simulated use environment, resulted in 97.2% dead wasps (*Vespula* spp.) after a 24 hour experimental period. Exposure to 3 months aged deposits of Fendona 6 SC 30mg ai/1m² on plywood (porous) surfaces resulted in 80.6% and 94.9.6% dead wasps (*Vespula* spp.) after a 24 and 48 hour experimental period, respectively.

Knock down was >90% after exposure for 2 hours to 1 day aged treated plywood surfaces and <90% after 2-6 hours exposure to 3 months aged treated plywood surfaces.

In the untreated control on porous surfaces mortality was 10% and 20% in 24 and 48 hours, respectively.

The results on the porous surfaces are not valid due to the low knockdown values with the months deposits and the high mortality in the untreated control.

Insecticide;	indoor	Fendona 6	Blattella	Laboratory	For details on	For details on test	Gibson, 2019a
Control of	application,	SC;	germanica	study	Test systems /	results see the	·
flying and crawling	surface treatment	Product used for read	(German cockroach)	,	concentrations applied /	following row marked with **	Accepted study
insects		across. A	Periplaneta		exposure see		
		detailed	americana		the following		
		justification	(American		row *		
		for read	cockroach),				
		across is	(Mixed sex and				
		given below	aged adults)				
		the table					

* Laboratory bioassays:

The product was applied at a rate of 15 mg a.i. per m^2 onto 15 x 15 cm ceramic (non-porous) and plywood (porous) surfaces. Applications were done by using a hand-held pump-spray. Insects were introduced onto the surfaces on Day 0 (once the product had dried). Surfaces were stored under ambient conditions prior to use.

Ten cockroaches were confined onto a tile within a plastic pint pot (568 mL), measuring 9 cm in diameter at its base. The inside of the pint pot was coated with liquid PTFE (Fluon) to prevent the insects from escaping. The insects were confined onto the surfaces for a 1 or 2 hour period; Following the confinement period, cockroaches were transferred into identical clean plastic containers. Cockroaches were provided with food (bran pellet) and water (damp cotton wool pad) following the 6 hour assessment. Assessments of knocked-down, moribund and dead insects were carried out at 1, 2, 4, 6, 24 and 48 hours, post initial exposure to treatments, and daily (1 day, 2 day, 3 day etc...) until 8 days post initial exposure.

Five replicates (5x) were conducted for each treatment (2x), for each surface type (2x), for each exposure period (2x), and for each species (2x). An untreated control is also assessed,

Temperature and relative humidity were maintained at appropriate levels with respect to insect biology and dial cycle. Temperature ranged from 22.1°C - 24.0°C and relative humidity ranged from 22.9% - 56.2%.

** Efficacy:

1 hour of exposure to fresh deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in 100% of German and American cockroaches being classified as knocked down at 1 to 6 hours. At 24 hours, 84-94% of German and 100% of American cockroaches were classified as moribund, while 6-16% of German and 0% of American cockroaches were classified as dead. At 24 hours and daily until 8 days post initial exposure, 100% of cockroaches were inactive, being recorded as moribund or dead. At 7 days, 98-100 % of cockroaches were recorded as dead. Mortality in the corresponding untreated control cohort remained below 2% for the duration of the 8 day assessment period (below 4% until day 3) for American cockroaches.

2 hours of exposure to fresh deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in 100% of German and American cockroaches being classified as knocked down at 1 to 6 hours. At 24 hours, 86-92% of German and 100% of American cockroaches were classified as moribund, while 8-14% of German and 0% of American cockroaches were classified as dead. At 24 hours and daily until 8 days post initial exposure, 100% of cockroaches were inactive, being recorded as moribund or dead. At 7 days, 98-100 % of cockroaches were recorded as dead. Mortality in the corresponding untreated control cohort remained below 2% for the duration of the 8 day assessment period for German and American cockrocahes.

Insecticide;	indoor	Fendona 6	Blattella	Laboratory	For details on	For details on test	Lüpkes, KH., 2012
Control of	application,	SC;	germanica	study.	Test system /	results see the	
flying and	surface	Product used	(German		concentrations	following row	Accepted study
crawling	treatment	for read	cockroach),		applied /	marked with **	(Not accepted for
insects		across. A	Ctenocephalides		exposure see		fleas)
		detailed	felis,		the following		'
		justification	Cimex lectularius		row *		
		for read	(Bed bug)				
		across is	(adults)				
		given below					
		the table					

* Laboratory bioassays:

The product was applied at a rate of 15mg a.i. per m² onto glazed tiles (non-porous surfaces) and carpet surfaces (porous surfaces) against cockroaches and fleas, and on glazed tiles (non-porous surfaces) and plywood (porous surfaces) against bedbugs. The diluted product was equally distributed on the surfaces by a computer controlled spraying apparatus (spray robot) with a volume of 50 ml per 1 m². For the residual tests, the insects were exposed to the treated surfaces at various intervals, the first time 1 day after treatment, following 1, 2 and 3 months after treatment. Various contact times were used, for cockroaches 1 hour, for bedbugs 6 hours, for fleas 24 hours. The evaluations for cumulative knocked-down + moribund + dead insects were made after 1 and 2 days after exposure to the treated surfaces. Dead cockroaches and fleas were recorded 4 days after exposure to the treated surfaces. Untreated controls were included. 5 replicates for each treatment were used, and 2 replicates for the control.

** Efficacy:

Cockroaches: 100% knocked down + moribund + dead insects were recorded 1 and 2 days after exposure and 100% dead cockroaches were recorded 4 days after exposure to 1 day, 1 month, 2 months and 3 months aged treated non-porous surfaces. On porous surfaces (carpets) 52%, 10% 22% and 0% dead insects were recorded in 4 days after exposure to 1 day, 1 month, 2 months and 3 months treated surfaces, respectively. Mortality in the untreated control was 0% on 1 day, 1 month and 3 months aged tiles, and 20% on 2 months aged tiles.

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Fleas: The exposure time of fleas is considered too long (24 hours) to be acceptable, and therefore the results against fleas are not valid. Bedbugs: 100% knocked down + moribund + dead insects were recorded 1 and 2 days after exposure and 100% dead bedbugs were recorded 7 days after exposure to 1 day, 1 month, 2 months and 3 months aged treated porous and non-porous surfaces. Mortality in the untreated control was 0%.

Insecticide; Control of	indoor application,	Fendona 6 SC;	Blattella germanica	Field trial	For details on Test system /	For details on test results see the	Serrano 2012
flying and crawling insects	spot, crack and crevice treatment	Product used for read across. A detailed justification for read across is given below the table	(German cockroach)		concentrations applied / exposure see the following row *	following row marked with **	Accepted study

* Field trials:

The test was conducted in multi-family public housing buildings with high level of German cockroaches infestation. No chemical treatment was applied in the preceding 8 weeks. 10 Sticky traps were used by apartment as a monitoring device for cockroach population. The sticky traps are placed overnight in an apartment, collected the next morning and returned to the laboratory for processing. Two precounts are made 7 and 3 days before the day of treatment. The application was done by a professional Pest Control Operator. The product was sprayed as spot, crack and crevice treatment at a rate of 15 or 30 mg a.i./2 (50 ml water solution/m²) in the preferred insects locations as: under the fridge, under the kitchen sink, under the oven and the water-heater, and on all cracks and crevices that can be an harborage for cockroaches. Assessments of population reduction were done 1, 3, 7, 28, 56 and 84 days after treatment. 5 apartments were treated with each dose and 5 apartments were used as untreated controls.

** Efficacy:

The application of Fendona 6 SC at 15 mg a.i. per m² resulted in an average 52,7%, 85,4%, 93,3%, 98,1%, 94,7% and 82,3% reduction in German cockroaches 1, 3, 7, 28, 56 and 84 days after treatment, respectively.

The application of Fendona 6 SC at 30 mg a.i. per m² resulted in an average 70,1%, 95,4%, 97,7%, 99,6%, 97,7% and 98,2% reduction in German cockroaches 1, 3, 7, 28, 56 and 84 days after treatment, respectively.

Population reduction of cockroaches was <4% in the apartments used as untreated control.

Insecticide; Control of	indoor application,	Fendona 6 SC;	Blatta orientalis (Oriental	Field trial		For details on test results see the	Estany, E., 2016g; 15/166BBB
flying and crawling		Product used for read	cockroach)			following row marked with **	Not accepted study
insects	treatment	across. A detailed			exposure see		,

justification	ti	the following	
for read	r	row *	
across is			
given below			
the table			

* Field trial:

Sites with an infestation of Oriental cockroaches were located, separated from any other infestations. A pre-monitoring assessment was conducted to establish the infestation level at the sites. A number (minimum of 5) of monitoring traps were placed at various locations around the infested sites. The number of cockroaches trapped was recorded over a period of 48 to 72 hours, at 2 days prior to application. The treatment was then applied at the site, according to the sponsor's instructions. A further set of monitoring traps were placed at the same location as for the premonitoring assessment, and assessed at weekly intervals for a total of 4 weeks post initial treatment application. The number of any visible knocked down and dead cockroaches were assessed. Applications were done as crack and crevice treatments by using a pressurised sprayerwand at a rate of 12 mg a.i./m², in 5L solution per 100 m². 3 replicates were conducted.

Site 1 had not been treated for about 1 year prior to treatment with Fendona 6SC, site 3 had not been treated for 8 weeks before Fendona 6SC treatment, whereas site 2 was previously treated with unknown domestic products before treatment with Fendona 6SC (no further info is provided). This study is not valid due to the treatment history in site 2.

** Efficacy:

Application of Fendona 6 SC at 12 mg a.i. per m² resulted in an average 94.7% reduction in Oriental cockroaches after a 4 week period. However, the results of this study are not valid due to the treatment history in site 2.

Insecticide;	indoor	Fendona 6 SC	Mosquitoes	Simulated use	For details on	For details on test	Gibson, 2019b
Control of	application,		(Culex	test	Test systems /	results see the	
flying and crawling insects	surface spotted treatment		quinquefasciatus) Houseflies (Musca domestica)		concentrations applied / exposure see the following row *	following row marked with **	Accepted study
			(Mixed aged females)				

*Sim.Use trial:

The product was applied at 15 mg ai/ m^2 . The bioassays were conducted within plain white rooms, measuring approximately 510 cm long x 240 cm wide x 240 cm high (approximately 29.4 m^3). Lighting was set at a 12:12 light: dark photoperiod. The floor, walls and ceiling of the room were lined with plastic sheeting, which was replaced between replicates, in order to prevent contamination. One treated tile type was placed around the room; on the floor and attached to the walls, covering an area of approximately 2 m^2 . The corresponding untreated tile type was also placed around the room, covering another 2 m^2 . The position of the treated/untreated tiles was mixed. Insects were provided with sugar-water wells placed in each of the four corners of the test room between the treated/untreated tiles. Following test chamber preparation, 50 adult female mosquitoes/ house flies were introduced into the chamber to interact with the surfaces.

The product was applied to approximately 2m² surface area of each surface type, using a hand held pressure sprayer. Treatment was conducted outside of the experimental chamber, with the treated panels then being introduced into the test chamber 24 hours following application. An untreated control treatment was also included. Further tests were conducted after 3 months againg of the treated surfaces to validate a

claim of residual efficacy. Treated panels used at the acute stage (1-day post treatment) were stored under ambient and darkened conditions, outside of the experimental chamber, prior to use.

knock-down and mortality were evaluated after 30 minutes and after 1, 2, 4, 6, 24, 48 hours (and each subsequent day until 7 days post introduction or until 100% mortality had been observed) following introduction of the mosquitoes/ house flies into the chamber. The insects remained within the test chamber throughout the experimental period.

4 replicates are done each (untreated control: 4).

** Efficacy:

Exposure to 1-day residual deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in > 96.6% of houseflies (*Musca domestica*) being classified as knocked down at 6 hours and >90% being classified as dead at 24 hours; Exposure to 3-month residual deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in 95.9% and 79.6%, respectively, of houseflies (*Musca domestica*) being classified as knocked down at 6 hours and >90% being classified as dead for both types of surfaces at 24 hours. Mortality in the corresponding untreated control at 24 hours was 5% for 1-day and 3-months porous and non-porous deposits.

Exposure of mosquitoes (*Culex quinquefasciatus*) to 1-day residual deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in >90% mortality in 3 and 4 days, respectively; Exposure of mosquitoes to 3-month residual deposits of Fendona 6SC applied at 15mg ai/m² on plywood and ceramic surfaces resulted in >90% mortality in 2 and 3 days, respectively. Less than 80% knockdown of mosquitoes was recorded after two to six hours of exposure to the treated surfaces in all treatments.

Mortality in the corresponding untreated control cohort was 0-7.2% for the duration of the 4-day assessment period for 1-day and 3-months porous and non-porous deposits.

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Conclusion on the efficacy of the product

Several efficacy studies (laboratory, simulated use and field studies) were submitted for Fendona 1.5 SC, using also studies conducted with Fendona 6 SC based on a bridging approach, which are sufficient to prove efficacy of Fendona 1.5 SC indoors in urban pest control (Intended use 1) by non-professionals at 15 mg a.s./ m^2 and in animal houses/shelters (intended use 2) by professionals and non-professionals at 15 and 30 mg a.s./ m^2 as follows:

In urban pest control (Intended use 1) the product is efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*), as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide; and against mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), as a coarse spray onto targeted spots or areas where insects may settle, noting that:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".
- "Residual activity against bedbugs is up to 3 months".
- "Mortality of bedbugs is achieved 1 week after exposure of the insects to the treated surfaces".
- "At least 1 re-application is required against bedbugs.".

In animal houses/shelters (intended use 2) the product is efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), and is applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle. The product is effective against the target organisms noting that:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "An application rate 15 mg/m² is set for high hygiene shelter places against cockroaches, otherwise an application rate 30 mg/m² should be used".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces) at the low dose and on porous and non-porous surfaces at the high dose".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".

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2.2.5.6 Occurrence of resistance and resistance management

As regards resistance, the applicant provides the following information:

"Alpha-cypermethrin, a synthetic pyrethroid, is the active substance of Fendona 1.5 SC. According to the Insecticide Resistance Action Committee's (IRAC) resistance database http://www.pesticideresistance.org (status of April, 2016), resistance to pyrethroids has been reported for a number of pests in Europe and other areas. A comprehensive summary of these reported cases of resistance is provided.

The IRAC database shows known resistance to alpha-cypermethrin of the following insect species Aedes aegypti (yellow fever mosquito), Aphis gossypii (melon and cotton aphid), Bactrocera oleae (olive fruit fly), Bemisia tabaci (sweetpotato whitefly), Chrysoperla carnea (common green lacewing), Culex pipiens pallens (mosquito), Culex tritaeniorhynchus (Mosquito), Frankliniella occidentalis (western flower thrips), Halotydeus destructor (redlegged earth mite), Helicoverpa armigera (cotton bollworm), Helopeltis theivora (tea mosquito bug), Leptinotarsa decemlineata (colorado potato beetle), Meligethes aeneus (pollen beetle), Myzus persicae (green peach aphid), Thrips tabaci (onion thrips), and Tuta absoluta (tomato leafminer). Most of them are agricultural pest insects relevant for crops, however, resistance was also observed in species such as mosquitos which can be found in domestic and public areas. Red poultry mite is another species controlled by biocides where resistance to pyrethroids has been reported in studies such as McNair (2015), Abbas (2014), Sparagano et all (2009), Nordenfors et all (2001) and Chauve (1998). References to other species are mentioned in the CAR report to alpha-cypermethrin (Belgium, 2014) obtained in the scope of a literature search which give information on resistance of cockroaches but they are not conclusive.

Taking this into consideration, a development of resistance against alpha-cypermethrin is in principle possible in a wide range of insect taxa (including cross-resistance).

Management strategies:

Good treatment practice will most likely result in high control levels which in turn reduces the likelihood of resistance development.

Whilst resistance has occurred and is a real problem in agricultural use, its expression is by no means uniform. The continued threat of resistance must be managed in order to prevent its build in species where it has already developed and in order to minimise the risk of resistance developing in species which have not yet developed resistance to the synthetic pyrethroids. For this reason, strategies such as alternation of insecticides with different modes of action, mixtures of insecticides with different modes of action and avoidance of frequent and repeated use are standard practice."

Strategies for managing the development of resistance:

- Where possible, application treatments should be recommended to be combined with non-chemical measures.
- To avoid the potential for insect resistance to Fendona 1.5SC, treatments should be alternated with insecticidal products having different modes of action.

- If resistance is confirmed, stop the use of Fendona 1.5SC immediately and rotate to an insecticide with alternative mode of action. By removing the selection pressure, the less-fit, resistant individuals will be removed over time and susceptibility should return to the population.
- Apply the recommended label dose rate during the proper timing to ensure complete
 control of the pest species. By allowing the fewest insects to survive, the spread of the
 resistant insects will be slowed.
- Follow good application techniques in order to maximize the product activity; deficient applications at less than the recommended label rate will allow the surviving insects to build up the population again, increasing the pest pressure against the product, which may trigger resistance problems in the future.
- Establish a baseline and monitor levels of effectiveness on populations in key areas in order to detect any significant changes in susceptibility to active substance. Information from resistance monitoring programs allows early detection of problems and gives information for correct decision making.
- The users should inform if the treatment is ineffective and report straightforward to the authorization holder. The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.

2.2.5.7 Known limitations

The applicant states that "No undesirable or unintended side effects e.g. on beneficial and other non-target organisms were observed".

In urban pest control (Intended use 1) the product was proved efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*), as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide; and against mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), as a coarse spray onto targeted spots or areas where insects may settle, with the following limitations:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".
- "Mortality of bedbugs is achieved 1 week after exposure of the insects to the treated surfaces".
- "At least 1 re-application is required against bedbugs.".

In animal houses/shelters (intended use 2) the product was proved efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), and is applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle. The product is effective against the target organisms with the following limitations:

- "Activity against German cockroaches is achieved only with fresh deposits.".

- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "An application rate 15 mg/m² is set for high hygiene shelter places against cockroaches, otherwise an application rate 30 mg/m² should be used".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces) at the low dose and on porous and non-porous surfaces at the high dose".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".
- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".

2.2.5.8 Evaluation of the label claims

According to the submitted PAR and SPC, the intended uses (label claims) as applied for by the applicant including target organisms, dose rates and application methods are as follows:

The product is intended for use indoors by professionals and non-professionals in rural hygiene and by non-professionals in urban pest control.

For urban pest control (intended use 1) the product is intended to be used against crawling insects, including cockroaches (*Blattella germanica*, *Blatta orientalis*, *Periplaneta americana*); nymphs and adults, ants (*Lasius niger*); mixed age except eggs, bedbugs (*Cimex lectularius*); nymphs and adults, and fleas (*Ctenocephalides felis*); adults, as well as against flying insects, including houseflies (*Musca domestica*); adults, mosquitoes (*Aedes mosquitoes*, *Aedes aegypti*, *Culex spp*, *Culex quinquefasciatus*); adults, and wasps (*Vespula spp*); adults. In urban settings, Fendona 1.5 SC will be applied in households, domestic and private areas. It will be applied as a crack and crevice treatment and/or onto targeted spots or areas where insects may crawl or hide for crawling insects; and onto targeted spots or areas where insects may crawl or settle for flying insects.

For rural hygiene (intended use 2), the product is intended to be used against crawling insects, including cockroaches (*Blattella germanica*, *Blatta orientalis*, *Periplaneta americana*); nymphs and adults, ants (*Lasius niger*); mixed age except eggs, and litter beetles (*Alphitobius diaperinus*); adults, as well as against flying insects, including stable flies (*Stomoxys calcitrans*); adults, houseflies (*Musca domestica*); adults, mosquitoes (*Aedes mosquitoes*, *Aedes aegypti*, *Culex spp*, *Culex quinquefasciatus*); adults, and wasps (*Vespula spp*); adults.

In rural hygiene situations, Fendona 1.5 SC will be applied in animal houses and shelters as a coarse spray for surface treatment, especially to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle.

The biocidal product will be applied by low pressure spraying. The application rates of FENDONA 1.5 SC are 100 mL product diluted in 5 L water for 100 m 2 (15 mg a.i./m 2) for urban pest control areas (intended use 1); and 100 or 200 mL product diluted in 5 L water for 100 m 2 (15 or 30 mg a.i./m 2) for animal houses/shelters (intended use 2).

Fendona 1.5 SC exhibits sustained residual activity, up to 3 months, where residues remain undisturbed.

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Trials submitted by the applicant to substantiate label claims:

To support the label claims, the applicant submitted the following efficacy data from laboratory, simulated use, and field tests using a variety of different experimental designs.

Cockroaches

• In the bridging simulated use test by Gibson 2016f the application of Fendona 6SC and Fendona 1.5 SC under the same lamboratory conditions as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² resulted in >97.5% affected (knocked down + dead) German and American cockroaches (Blatella germanica & Periplaneta americana) after a 24 and 48 hour experimental period. Exposure to 3 month aged deposits of both products applied at 15 mg ai/m² on plywood (porous) and glazed ceramic (non-porous) surfaces resulted in >90% knockdown against German and American cockroaches 6 hours post treatment. No difference was found between the efficacy of both formulations.

Based on the results of this bridging simulated use study using two cockroach species as representative target organisms (one small and one large species), the two products (Fendona 6SC and Fendona 1.5 SC) may be considered equivalent in terms of their efficacy when applied as surface treatments. Hence, the extrapolation of efficacy between these products as surface treatment at the same dose rate of active substance is applicable.

• In the laboratory studies by Gibson 2016d and 2016e the application of Fendona 6SC as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 and 30 mg a.i./m² resulted in <90% dead German cockroaches, Oriental cockroaches and litter beetles and >90% dead ants, mosquitoes and stable flies. At 15 mg a.i/m², 1 day aged deposits on porous and non-porous surfaces resulted in <90% dead houseflies after 24 hours and >90% dead houseflies after 48 hours, while 3 months aged deposits gave >90% dead houseflies after 24 and 48 hours. At 30 mg a.i/m², 1 day and 3 months aged deposits on porous and non-porous surfaces resulted

in >90% dead houseflies after 24 and 48 hours.

At 15 mg a.i./1 m², 1 day and 3 months aged deposits on porous and non-porous surfaces resulted in <90% dead wasps after 24 hours and >90% dead wasps after 48 hours. At 30 mg a.i./1 m², 1 day and 3 months aged deposits on porous surfaces resulted in <90% dead wasps after 24 hours and >90% dead wasps after 48 hours, while 1 day and 3 months aged deposits on non-porous surfaces resulted in >90% dead wasps after 24 and 48 hours.

Exposure to 3-month deposits resulted in >90% knock down against German cockroaches, Oriental cockroaches, Black ants, Mosquitoes ($Aedes\ aegypti$), House flies, Stable flies and Litter beetles after 1 hour after 2 hours exposure to treated porous and non-porous surfaces at 15 and 30 mg a.i./m². Against wasps, exposure to 3-month deposits to porous and non-porous surfaces resulted in >90% knock down 4 hours after treatment at 15 mg a.i./m², and 87.5% knock down on porous surfaces 6 hours after exposure and 100% knockdown on non-porous surfaces 1 hour after treatment at 30 mg a.i./m².

The results on non-porous surfaces against mosquitoes are not valid due to high mortality in the untreated control (10.25%).

The results on porous surfaces with fresh deposits in 24 hours against wasps are not valid due to high mortality in the untreated control (15%). The percentages of dead wasps with 1 day and 3 months aged deposits in 48 hours in the untreated controls were 12.5% - 22.5%, and therefore are considered not acceptable.

Hence, the results of these laboratory studies support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment for 3 months post treatment at 15 and 30 mg a.i./m² on porous and non-porous surfaces against Black ants (*Lasius niger*), House flies (*Musca domestica*) and Stable flies (*Stomoxys calcitrans*), on porous surfaces against Mosquitoes (*Aedes aegypti*), and at 30 mg a.i./m² on non-porous surfaces against wasps (*Vespula* spp.) noting that mortality against wasps was achieved in 24 hours after exposure to the treated surfaces and that noticeable knockdown was recorded in 1 hour after contact with the treated surfaces.

Also, the results of these laboratory studies do not support efficacy of Fendona 6SC as surface treatment for 1 day to 3 months post treatment at 15 and 30 mg a.i./ m^2 on porous and non-porous surfaces against German cockroaches, Oriental cockroaches and litter beetles.

• In the field study by Estany 2016a (15 mg a.i./m2), site 1 had not been treated before, in site 2 no additional insecticide treatments were applied 3 months previous to the Fendona 6 SC test treatment, and site 3 was previously treated with another insecticidal product about one month before the experimental treatment with Fendona 6 SC. Hence, the study by Estany 2016a is not valid due to the treatment history in one of the tested sites. In the field study by Estany 2016b the application of Fendona 6SC as crack and crevice treatment resulted in 96.9% reduction in Gerrman cockroaches (Blatella germanica) at 30 mg a.i./m², in 5L solution per 100 m², 4 weeks post treatment.

Hence, the results of these field studies support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as crack and crevice treatment at 30 mg a.i./ m^2 , in 5L solution per 100 m^2 , against German cockroaches, 4 weeks post treatment.

In the field study by Estany 2016c, site 1 had been treated with an unspecified non-professional spray product (no further information available), site 2 had not been treated in the three months previous to the experimental treatment with Fendona 6 SC and site 3 was treated with insecticidal gel in bait stations, which were removed previously to the study. Hence, this study is not valid due to the treatment history in two of the tested sites.

Hence, the results of this field study do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as crack and crevice treatment at 15 mg a.i./ m^2 , against Oriental cockroaches.

• In the field study by Estany (2016d), the site 2 had not been treated with another product three months before treatment with Fendona 6SC, whereas the sites 1 and 3 had been treated with unknown domestic products (no further info is provided) prior to treatment with Fendona 6SC. Hence this study is not valid due to the treatment history in two of the tested sites.

Hence, the results of this field study do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as crack and crevice treatment against Oriental and American cockroaches at 30 mg a.i./ m^2 , in 5L solution per 100 m^2 , 4 weeks post treatment.

• In the field study by Miller and Peters (1988b) the application of Fendona 1.5SC as crack and crevice and surface treatment resulted in 96.9% - 100% population reduction in American and Australian cockroaches (*Periplaneta americana* and *Periplaneta australasiae*) at 15 mg a.i./m², in 5L solution per 100 m², 2 weeks to 6 months post treatment. However, according to the study report, a permethrin-based product was

used at the same time with Fendona, and therefore it is unclear whether the observed effect was caused only by Fendona.

Hence, the results of this field study do not support efficacy of Fendona 1.5SC as crack and crevice and surface treatment at 15~mg a.i./m² against American and Australian cockroaches.

• In the laboratory study by Gibson 2019a the application of Fendona 6SC as surface treatment with fresh deposits for 1-2 hours on porous and non-porous surfaces at 15 mg a.i./m² resulted in 100% knocked down German cockroaches (*Blattella germanica*) and American cockroaches (*Periplaneta americana*) in 1 to 6 hours. At 24 hours post treatment, <90% of treated German and American cockroaches were recorded as dead. However, at 24 hours and daily until 8 days post initial exposure for 1-2 hours, 100% of German and American cockroaches were inactive, being recorded as moribund and/or dead. At 7 days, after 1 or 2 hours exposure on both types of treated surfaces, 98-100% of German and American cockroaches were recorded as dead. It is noted that the results concerning the mortality of American cockroaches after 1 hour exposure at 7 days post treatment are not valid due to the high mortality in the control 4 days post treatment (12%).

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces with fresh deposits at 15 mg a.i./m² against German cockroaches (*Blattella germanica*) and American cockroaches (*Periplaneta americana*), with the note that mortality was achieved 1 week after exposure of the insects to the treated surfaces.

• In the laboratory study by Lupkes 2012 the application of Fendona 6SC as surface treatment resulted in 100% knocked down + moribund + dead German cockroaches in 1 and 2 days after exposure and 100% dead German cockroaches 4 days after exposure to 1 day, 1 month, 2 months and 3 months aged treated non-porous surfaces. However, on porous surfaces (carpets) <90% dead German cockroaches were recorded in 4 days after exposure to 1 day, 1 month, 2 months and 3 months treated surfaces.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on non-porous surfaces with 1 day to 3 months deposits at 15 mg a.i./ m^2 against German cockroaches (*Blattella germanica*), with the note that mortality was achieved 4 days after exposure of the insects to the treated surfaces.

• In the field study by Estany (2016g) against Oriental cockroaches with crack and crevice treatment at 12 mg a.i./m², site 1 had not been treated for about 1 year prior to treatment with Fendona 6SC, site 3 had not been treated for 8 weeks before Fendona 6SC treatment, whereas site 2 was previously treated with unknown domestic products before treatment with Fendona 6SC (no further info is provided). Hence, the study is not valid due to the treatment history in one of the tested sites.

Hence, the results of this field study do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as crack and crevice treatment against Oriental cockroaches at 12 mg a.i./ m^2 , in 5L solution per 100 m^2 , 4 weeks post treatment.

• In the field study by Serrano (2012) against German cockroaches, the application of Fendona 6SC with spot, crack and crevice treatment at 15 mg a.i./m² resulted in >90% population reduction at 7 until 56 days after treatment. The application of Fendona 6SC with spot, crack and crevice treatment at 30 mg a.i./m² resulted in >90% population reduction at 3 until 84 days after treatment.

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Hence, the results of this field study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spot, crack and crevice treatment against German cockroaches at 15 mg a.i./ m^2 , in 5L solution per 100 m^2 , for 2 months post treatment; and at 30 mg a.i/ m^2 , in 5L solution per 100 m^2 , for 3 months post treatment.

Ants

• In the laboratory study by Miller and Peters (1989) the application of Fendona 1.5SC as surface treatment resulted in 95% and 90% knockdown of Coastal brown ant (*Pheidole megacephala*) at 15 and 30 mg a.i./m², respectively, 2 months post treatment.

However, the study protocol did not include mortality records and therefore the results do not adequately support the efficacy of Fendona 1.5SC against Coastal brown ants (*Pheidole megacephala*).

• In the laboratory study by Miller and Peters (1988a) the application of Fendona 1.5SC as surface treatment resulted in <75% knockdown of Black house ants (*Iridomyrmex glaber*) at 15 and 30 mg a.i./m², respectively, 1-3 months post treatment after 3 hours exposure to the treated surfaces.

The study protocol did not include mortality records and therefore the results do not adequately support the efficacy of Fendona 1.5SC against Black house ants (*Iridomyrmex glaber*).

- The results of the laboratory studies by Gibson 2016d and 2016e (described in the section for cockroaches) support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces at 15 and 30 mg a.i./m² against Black ants (*Lasius niger*) for 3 months post treatment.
- In the field study by Gibson 2016a Fendona 6SC was applied as spotted surface treatment at a rate of 24 mg a.i./50 mL water/m² against black garden ants (*Lasius niger*).

However, the results do not adequately prove efficacy of Fendona 1.5SC (read across from Fendona 6SC) due to high population reduction in the untreated control nests 7-28 post treatment (24-75%).

• In the field studies by Gibson (2016g) and Gibson (2016h) the application of Fendona 6SC as surface spotted treatment resulted in 93.3% and 97.8% reduction of black garden ants (*Lasius niger*) population at 15 and 30 mg a.i./m², in 5L solution per 100 m², 28 days post treatment.

Hence, the results of these field studies can be used to support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spotted surface treatment against black garden ants (*Lasius niger*) at 15 and 30 mg a.i./ m^2 , in 5L solution per 100 m^2 , 4 weeks post treatment.

Flies

• The results of the laboratory studies by Gibson 2016d and 2016e (described in the section for cockroaches) support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces at 15 and 30 mg a.i./m² against House flies (*Musca domestica*) and Stable flies (*Stomoxys calcitrans*) for 3 months post treatment.

• In the laboratory study by Lupkes 2011 the application of Fendona 1.5SC as surface treatment with 3 months deposits on porous and non-porous surfaces at 15 and 30 mg a.i./m² resulted in 100% knockdown against houseflies and stable flies within 15-30 minutes after exposure. For litter beetles 100% knockdown was recorded within 15 – 120 minutes after exposure to porous and non-porous surfaces aged for 3 months. In this study the mortality records after 24 and 48 hours is considered invalid because the insects were exposed permanently to treated surfaces for too long.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC, in terms of knockdown, as surface treatment on porous and non-porous surfaces against House flies (*Musca domestica*) and Stable flies (*Stomoxys calcitrans*) at 15 and 30 mg a.i./m² for 3 months.

• In the simulated use studies by Gibson 2016b and 2016c the application of Fendona 6SC as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 and 30 mg a.i./m² resulted in >98% affected (knocked down and dead) mosquitoes (*Aedes aegypti*), houseflies (*Musca domestica*) and litter beetles (*Alphitobius diaperinus*), and <18% affected Chicken red mites (*Dermanyssus gallinae*) 24 and 48 hours after exposure to the treated surfaces. Exposure to 3 month aged deposits resulted in >80% knock down 2 hours after exposure to the treated porous and non-porous surfaces at 15 and 30 mg ai/m² against mosquitoes, houseflies and litter beetles. However, exposure to 1 day and 3 month aged deposits of Fendona 6 SC at 15 and 30 mg ai/m² on porous and non-porous surfaces in a simulated use environment resulted in <90% dead mosquitoes (*Aedes aegypti*), houseflies (*Musca domestica*), and litter beetles (*Alphitobius diaperinus*), after a 24 and 48 hour experimental period.

It is noted that for the flying insects the product was applied as a spotted surface treatment.

Hence, the results of these simulated use studies do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment against mosquitoes (Aedes aegypti) and houseflies (Musca domestica), and surface treatment against litter beetles (Alphitobius diaperinus), on porous and non-porous surfaces at 15 and 30 mg a.i./m² for 1 day to 3 months post treatment.

• In the field study by Estany 2016e the application of Fendona 6SC as spotted surface treatment at 15 mg a.i. per m² in animal houses provided an average 73.8%, 77% and 80.5% population reduction, in terms of corrected percent control achieved, in stable flies' numbers after a 7, 14 and 21 days period, respectively. The treatment resulted in 94%, 73.6% and 73.9% reduction in stable fly numbers after 21 days, relative to pretreatment levels, at sites 1, 2 and 3 respectively. For the low population reduction at site 2, secondary re-infestations from outdoors premises (animal housing, etc.) should be presumed according to the applicant, however the low stable fly population reduction at site 3 is not justified.

Hence, the results of this field study, due to the low efficacy levels (73.8%, 77% and 80.5% population reduction 7, 14 and 21 days post treatment, respectively), do not adequately support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spotted surface treatment at 15 mg a.i. per m2 in animal houses against stable flies (*Stomoxys calcitrans*). It is noted that the residual effect was tested for 3 weeks, not for 3 months as claimed by the applicant.

• In the field study by Estany 2016f the application of Fendona 6SC as spotted surface treatment at 30 mg a.i. per m2 in animal houses provided an average 80.1%, 62.2% and 71.4% population reduction, in terms of corrected percent control achieved, in stable flies' numbers after a 7, 14 and 21 days period, respectively. The treatment resulted in 97.3%, 51.1% and 65.7% reduction in stable fly numbers after 21 days, relative to pre-treatment levels, at sites 1, 2 and 3 respectively. For the low population reduction at site 2, secondary re-infestations from adjacent outdoors premises could be presumed according to the applicant, however the low stable fly population reduction at site 3 is not justified.

Hence, the results of this field study, due to the low efficacy level (80.1%, 62.2% and 71.4% population reduction 7, 14 and 21 days post treatment, respectively), do not adequately support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spotted surface treatment at 30 mg a.i. per m2 in animal houses against stable flies (*Stomoxys calcitrans*). It is noted that the residual effect was tested for 3 weeks, not for 3 months as claimed by the applicant.

• In the field study by Latorre 2017a, the application of Fendona 6SC as spotted surface treatment at 15 mg a.i. per m² in animal houses provided, in terms of corrected percent control achieved, for house flies an average of 39.4% population reduction during the first month, 43.8% during the second month and 49.1% during the third month post treatment. In stable flies, the average population reduction was of 28.4% during the first month, 30.7% during the second month and 37.9% during the third month.

In the field study by Latorre 2017b, the application of Fendona 6SC as spotted surface treatment at 30 mg a.i. per m^2 in animal houses provided, in terms of corrected percent control achieved, for house flies an average of 31.7% population reduction during the first month, 33.2% during the second month and 24.2% during the third month. In stable flies, the population reduction was of 37.8% during the first month, 31.4% during the second month and 50.9% during the third month.

The applicant justifies the low efficacy levels by stating the following: "It should be noted that stables and other animal buildings are considered very challenging situations in which to control houseflies, because of the continuous risk of reinvasion from adjacent premises. In these situations, even what is considered a low % of control - when comparing to other pests and/or other situations – is still perceived as a positive effect in these cases. Considering that the residual activity provided by some of the most widely used fly baits does not exceed 35% in 5 weeks (the applicant provided two relevant supporting literature papers), this is the reason why multiple applications are recommended, and that the % population reduction provided by Fendona for up to 3 months after the application is expected to be highly appreciated in animal buildings.".

However, the eCA does not agree with the applicant's statement and considers that the very low overall efficacy levels of <50% fly population reduction in the aforementioned field studies do not adequately support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spotted surface treatment at 15 and 30 mg a.i. per m^2 in animal houses against houseflies (*Musca domestica*) and stable flies (*Stomoxys calcitrans*).

• In the simulated use study by Gibson 2019b the application of Fendona 6SC as surface spotted treatment with 1-day deposits on porous and non-porous surfaces at 15 mg a.i./m² against *Musca domestica* resulted in >90% knock down in 6 hours and >90% mortality in 24 hours. Exposure of houseflies to 3-month residual deposits of Fendona 6SC applied at 15mg ai/m² on porous and non-porous surfaces resulted in 95.9% and

79.6% knockdown, respectively, in 6 hours and >90% mortality for both types of surfaces in 24 hours.

Hence, the results of this simulated use study support the efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment with fresh (1-day) and 3-month deposits on porous and non-porous surfaces at 15 mg a.i./m² against houseflies (*Musca domestica*).

Mosquitoes

- The results of the laboratory studies by Gibson 2016d and 2016e (described in the section for cockroaches) support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous surfaces at 15 and 30 mg a.i./m² against Mosquitoes (*Aedes aegypti*), for 3 months post treatment.
- In the laboratory study by Gibson 2017a, the application of Fendona 6SC as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² against mosquitoes (*Culex quinquefasciatus*) resulted in 91.9% 100% dead mosquitoes 24 and 48 hours after exposure to the treated surfaces. Also, 100% knockdown was recorded after two hours of exposure to the treated surfaces in all treatments.

In the laboratory study by Gibson 2017b the application of Fendona 6SC as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 30 mg a.i./m² against mosquitoes (*Culex quinquefasciatus*) resulted in 86.9% mortality on porous surfaces and 92.5% mortality on non-porous surfaces with the 3-month residues at 24 hours after exposure. However, mortality was increased after a 48 hour experimental period reaching 100% on both surfaces. It is noted that mortality in the untreated control on 3-month aged porous surfaces at 48 hours was 5%. Therefore, the 86.9% mortality level at 24 hours is considred acceptable. Also, 100% knockdown was recorded after two hours of exposure to the treated surfaces in all treatments.

Hence, the results of these laboratory studies support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces at 15 and 30 mg a.i./m² against mosquitoes (*Culex quinquefasciatus*) for 3 months post treatment.

- The results of the simulated use tests by Gibson 2016b and 2016c (described in the section for flies) do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment against mosquitoes (*Aedes aegypti*) on porous and non-porous surfaces at 15 and 30 mg a.i./m², for 1 day and 3 months post treatment.
- In the simulated use study by Gibson 2018a the application of Fendona 6SC as surface spotted treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² against *Culex quinquefasciatus* resulted in 82% and 84% affected (knock down + dead) mosquitoes on 1 day aged porous surfaces 24 and 48 hours post treatment, respectively, and 89.5% and 92% affected (knock down + dead) mosquitoes on 1 day aged non-porous surfaces 24 and 48 hours post treatment, respectively. Exposure to residual deposits of Fendona 6 SC 15mg ai/m², resulted in 81% and 84% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged porous surfaces 24 and 48 hours post treatment, respectively, and 81.5% and 83% affected (knock down + dead) mosquitoes (*Culex pipiens*) on 3-month aged non-porous surfaces 24 and 48 hours post treatment, respectively. Exposure to fresh (1 day) deposits of Fendona 6 SC at 15 mg ai/m² on porous and non-porous surfaces resulted in <90%

dead mosquitoes (*Culex quinquefasciatus*) in 24 hours post treatment, however in 48 hours the treatment on non-porous surfaces resulted in >90% dead mosquitoes (*Culex quinquefasciatus*).

In the simulated use study by Gibson 2018b the application of Fendona 6SC as surface spotted treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 30 mg a.i./m² against *Culex quinquefasciatus* mosquitoes resulted in 89.5% and 92% affected (knock down + dead) mosquitoes on 1 day aged porous surfaces 24 and 48 hours post treatment, respectively, and 89.5% and 93.5% affected (knock down + dead) mosquitoes on 1 day aged non-porous surfaces 24 and 48 hours post treatment, respectively. Exposure to residual deposits of Fendona 6 SC 30mg ai/m², resulted in 86% and 88.5% affected (knock down + dead) mosquitoes *Culex pipiens* on 3-month aged porous surfaces 24 and 48 hours post treatment, respectively, and 87.5% and 89% affected (knock down + dead) mosquitoes on 3-month aged non-porous surfaces 24 and 48 hours post treatment, respectively.

Exposure to fresh (1 day) deposits of Fendona 6 SC at 30 mg ai/m 2 on porous and non-porous surfaces resulted in <90% dead mosquitoes (*Culex quinquefasciatus*) in 24 hours post treatment, however in 48 hours the treatment on non-porous and porous surfaces resulted in >90% dead mosquitoes (*Culex quinquefasciatus*).

Hence, the results of these simulated use studies support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment with fresh deposits (1 day old) on non-porous surfaces at 15 mg a.i./ m^2 , and on porous and on non-porous surfaces at 30 mg a.i./ m^2 against *Culex quinquefasciatus*, noting that mortality is achieved 48 hours after exposure of the insects to the treated surfaces.

• In the simulated use study by Gibson 2019b the application of Fendona 6SC as surface spotted treatment with 1 day deposits on porous and non-porous surfaces at 15 mg a.i./m² against *Culex quinquefasciatus* resulted in <90% mortality in 24 hours, however the treatment resulted in >90% dead mosquitoes in 3 and 4 days, respectively. Exposure of mosquitoes to 3-month residual deposits of Fendona 6SC applied at 15mg ai/m² on porous and non-porous surfaces resulted in <90% mortality in 24 hours, however the treatment resulted in >90% dead mosquitoes in 2 and 3 days, respectively. Less than 80% knockdown of mosquitoes was recorded after two to six hours of exposure to the treated surfaces in all treatments. Mortality in the corresponding untreated control cohort was 0-7.2% for the duration of the 4-day assessment period for 1-day and 3-months porous and non-porous deposits.

Hence, the results of this simulated use study support the killing effect of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment with fresh (1-day) and 3-month deposits on porous and non-porous surfaces at 15 mg a.i./ m^2 against *Culex quinquefasciatus*, noting that mortality is achieved 2-4 days after exposure of the insects to the treated surfaces.

Wasps

• The results of the laboratory studies by Gibson 2016d and 2016e (described in the section for cockroaches), support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment for 3 months post treatment at 30 mg a.i./m² on non-porous surfaces against wasps (*Vespula* spp.) noting that mortality against wasps was achieved in 24 hours after exposure to the treated surfaces and that noticeable knockdown was recorded in 1 hour after contact with the treated surfaces.

• In the simulated use studies by Gibson 2018c and 2018d the application of Fendona 6SC as surface spot treatment with 1 day and 3 months deposits on non-porous surfaces at 15 and 30 mg a.i./m² resulted in >90% dead Wasps (*Vespula germanica* and *Vespula vulgaris*) 24 hours after exposure to the treated surfaces. Knock down was >90% after exposure at 15 and 30 mg a.i./m² for 6 hours on non-porous surfaces. The results on porous surfaces are considered not valid due to the high mortality in the untreated control (10% and 20% in 24 and 48 hours, respectively) for both tested doses (15 and 30 mg a.i./m²) and the low knockdown values (<90%) after 2-6 hours exposure to 1 day and 3 months deposits at 15 mg a.i/m² and 3 months deposits at 30 mg a.i/m².

Hence, the results of the simulated studies by Gibson 2018c and 2018d support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spot treatment at 15 and 30 mg a.i./ m^2 against wasps (Vespula spp.) for up to 3 months, noting however that residual activity against wasps (Vespula spp.) was achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months, and that noticeable knockdown effect on wasps was observed within 6 hours after contact of the insects with non-porous treated surfaces and mortality was achieved at 24 hours.

Litter beetles

- The results of the laboratory study by Lupkes 2011 (described in the section for flies) support efficacy of Fendona 1.5SC, in terms of knockdown, as surface treatment on porous and non-porous surfaces against litter beetles (*Alphitobius diaperinus*) at 30 mg a.i./m² for 3 months.
- The results of the laboratory studies by Gibson 2016d and 2016e (described in the section for cockroaches) do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces at 15 and 30 mg a.i./m² against Litter beetles (*Alphitobius diaperinus*), for 1 day to 3 months post treatment.
- The results of the simulated use studies by Gibson 2016b and 2016c (described in the section for flies) do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment against litter beetles (*Alphitobius diaperinus*), on porous and non-porous surfaces at 15 and 30 mg a.i./m², for 1 day to 3 months post treatment.

Bedbugs

• In the laboratory study by Loakes 2011 the application of Fendona 6SC as surface treatment with 1 day, 1 month and 3 months deposits on two porous and one non-porous surfaces at 30 mg a.i./m² against Bedbugs (*Cimex lectularius*) resulted in 100% affected (knocked down and dead) insects after 24 hours observation period with the 3 month deposits. Knock down records for bedbugs ranged between 92.5% and 100%, 1 hour post treatment for all ageing times and types of surfaces.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment against Bedbugs ($Cimex\ lectularius$) on porous and non-porous surfaces at 30 mg a.i./m² for 3 months post treatment. However, this study is not relevant for efficacy evaluation of label claims since the product is intended to be use against bedbugs at the lower dose of 15 mg a.s./m².

• In the laboratory study by Gibson 2017c the application of Fendona 6SC as surface treatment with 1 day, 1 month and 3 months deposits on porous and non-porous

surfaces at 15 mg a.i./m² resulted in >95% affected (knocked down and dead) Bedbugs (*Cimex lectularius*), 24 hours after exposure to the treated surfaces. Exposure to 3-month deposits resulted in >95% knock down against Bedbugs after 6 hours exposure to the treated porous and non-porous surfaces at 15 mg a.i./m². Although 24 hours after exposure to 3-months deposits resulted in <95% dead bedbugs, in 1 week post exposure mortality reached 92.5% and 100% in two porous surfaces (cotton fabric and wallpaper, respectively) and 100% in one non-porous (glazed ceramic) surface.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces at 15 mg a.i./ m^2 against Bedbugs (*Cimex lectularius*) for 3 months post treatment, noting however that mortality is achieved 1 week after exposure of the insects to the treated surfaces.

• In the field study by Foltan 2017 the application of Fendona 6SC as crack and crevice treatment resulted in 88.4% and 77.4% population reduction of bedbugs 2 weeks after application at 30mg ai/m² and 15 mg ai/m², respectively. Both application rates resulted in 100% control of the bed bug populations for 14 weeks following the second application.

It is noted that the treatment regime of 2 subsequent applications that provided 100% control of bedbugs at the end, is justified by the following requirement of the TNsG for bedbug control: "Treatment repeats usually are necessary in bedbug control. At the end of a treatment, 100 % efficacy should be achieved".

Hence, the results of this field study support efficacy of the product as crack and crevice treatment at 15 mg ai/m² against bed bugs (*Cimex lectularius*) for 3 months post treatment, noting that at least 1 re-application is required after initial application. Also, the results of this study support the claim that "Treated areas should be re-inspected after 2– 3 weeks. Where initial infestation was severe a second application may be required particularly if the first treatment has been disturbed or some harbourages/landing sites were missed in the initial application."

• In the laboratory study by Lupkes 2012 the application of Fendona 6SC as surface treatment resulted in 100% knocked down + moribund + dead bedbugs 1 and 2 days after exposure and 100% dead bedbugs in 7 days after exposure to 1 day, 1 month, 2 months and 3 months aged treated porous and non-porous surfaces.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on porous and non-porous surfaces with 1 day to 3 months deposits at 15 mg a.i./ m^2 against bedbugs, with the note that mortality was achieved 7 days after exposure of the insects to the treated surfaces.

Fleas

 In the laboratory study by Loakes 2011 the application of Fendona 6SC as surface treatment with 1 day, 1 month and 3 months deposits on two porous and one nonporous surfaces at 30 mg a.i./m² against Cat fleas (*Ctenocephalides felis*) resulted in 95-100% affected (knocked down and dead) insects after 24 and 48 hours observation period with the 3 month deposits.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment against Cat fleas (*Ctenocephalides felis*) on porous and non-porous surfaces at 30 mg a.i./m² for 3 months post treatment. However, this study

is not relevant for efficacy evaluation of label claims since the product is intended to be use against fleas at the lower dose of 15 mg a.s./m².

• In the laboratory study by Gibson 2017c the application of Fendona 6SC as surface treatment with 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² gave the following results concerning mortality against Cat fleas (*Ctenocephalides felis*): 95% in 24 hours after exposure to treated ceramic glazed (non-porous) surfaces, 52.5% in 24 hours and 95% in 48 hours on plywood, and 25% in 24 hours and 85% in 48 hours on carpets For the 3-month deposits against fleas mortality in the untreated control was 7.5% and 15% on ceramic surfaces in 24 hours and 48 hours, 7.5% and 17.5% on plywood, and 15% and 17.5% on carpets, respectively.. In cases where mortality in the untreated controls was >10% the results are considered not valid.

Hence, the results of this laboratory study support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment on non-porous surfaces at 15 mg a.i./m², against Cat fleas (*Ctenocephalides felis*) for 3 months post treatment.

• In the simulated use studies by Gibson 2017d and 2017e the application of Fendona 6SC as surface treatment with 1 day and 3 months deposits on porous and non-porous surfaces at 15 and 30 mg a.i./m² resulted in >90% affected (knocked down + dead) Cat fleas (*Ctenocephalides felis*), 48 hours after exposure to treated plywood (porous) and ceramic glazed (non-porous). Exposure to 3-month deposits resulted in 70% and 77.5% affected Cat fleas at 15 and 30 mg a.i./m², respectively, 48 hours after exposure to treated carpet (porous). Exposure to 1-day deposits resulted in 83.7% and 82.5% affected Cat fleas at 15 and 30 mg a.i./m², respectively, 48 hours after exposure to treated carpet (porous).

Exposure to 1 day and 3 months deposits on porous and non-porous surfaces at 15 mg a.i./m² resulted in <90% dead Cat fleas (*Ctenocephalides felis*), 48 hours after exposure to treated plywood (porous), carpet (porous) and ceramic glazed (non-porous) surfaces. Exposure to 1 day and 3 months deposits on porous and non-porous surfaces at 30 mg a.i./m² resulted in <90% dead Cat fleas (*Ctenocephalides felis*), 48 hours after exposure to treated plywood (porous) and carpet (porous) surfaces and >90% dead insects on ceramic glazed (non-porous) surfaces. The results of exposure to 3 month deposits on non-porous surfaces in 48 hours are considered not valid due to high mortality in the untreated control (12.5%). It is noted that against fleas only the low dose of 15 mg a.i./m² is claimed by the applicant.

It is noted that in terms of the application method that was used in these simulated use tests the applicant clarifies that "the simulated-use test design that was used, provided the insects with the option to crawl onto the treated or untreated area and in addition provided places where the insects could hide (between tiles, underneath the surfaces), and as such mimics as far as possible the practical use situation.". Therefore, the study design supports the claimed spot, crack and crevice application method against fleas.

However, considering that <90% mortality of cat fleas was recorded 48 hours after exposure to 1 day and 3 months deposits on porous and non-porous surfaces, the results of the simulated use-test by Gibson 2017d do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as spot, crack and crevice treatment on porous and non-porous surfaces at 15 mg a.i./ m^2 against Cat fleas (*Ctenocephalides felis*) for 1 day to 3 months post treatment.

• In the laboratory study by Lupkes 2012 the exposure time of fleas onto the treated surfaces under confined conditions (24 hours) is considered too long to be acceptable, and therefore the results against fleas are not valid.

Hence, the results of this laboratory study do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface treatment at 15 mg a.i./m² against fleas.

Further to the results of the submitted efficacy studies, the eCA highlights the following critical points for efficacy evaluation:

- The applicant provided the following justification, which is accepted by the eCA, for read across of data from the product FENDONA 1.5 SC to FENDONA 6 SC: "In addition to the studies performed with the product FENDONA 6 SC (BAS 310 27I), additional studies with FENDONA 1.5 SC (BAS 310 22I) are presented to reinforce the different claims. The compositions of both products (please refer to the confidentional annex) are very similar, and indeed are almost identical when considering the spray solution concentrations (where the products are diluted to give the same alpha-cypermethrin concentration for the same rate of application per m²). Therefore, the slight variations in the composition of the two products will have no impact on the efficacy of the product, which is supported by the results of the studies conducted with Fendona 1.5 SC (1988/8000001, DocID 1988/8000003, DocID 1989/8000001, DocID 2011/1291553) and the bridging trial conducted with both products (DocID 2016/1136390).".
- In the study reports for studies by Gibson 2016b, 2016c, 2016d, 2016e, 2016f, 2017c, 2017d, 2017e, 2018a, 2018b and Loakes 2011, the definitions of the terms "knocked down", "dead" and "affected" insects are clarified by the applicant as follows: "Knockdown was defined as: "the test system is unable to right-itself, or make co-ordinated, directional movements, but small and/or infrequent movement of appendages are detected with (or without) probing"; dead was defined as: "test system has no response to tactile stimuli". In collating the data in preparation for the report, the term 'Affected' is used to report the efficacy of the product this is a calculation of the combined totals of both the 'knocked down' and 'dead' insects. In this experiment the definition of knocked down also encompassed moribund insects & insects that were paralysed and very unlikely to recover it can be assumed that most if not all of the insects falling within this category of 'knockdown' (at 24 and 48 hours) would have gone on to die a short time afterwards. As such the term 'Affected' is used to report the data-set instead of the term mortality but both can be assumed to measure the same parameters of efficacy."

In opposition to the afore-mentioned justification by the applicant, the efficacy evaluation of the product in the submitted lab and simulated use studies is based on the dead insects, not "affected" (dead + knocked down insects), following the efficacy criteria that are set in the efficacy guidance (TNsG).

 The applicant supports the general surface treatment, especially to cracks and crevices, against crawling insects and cockroaches in animal houses (intended use 2), using the results of the field studies where the product was applied in apartments as a crack and crevice treatment.

To support this claim, the applicant provided the following justification, which is accepted by the eCA: "Considering the efficacy observed against both species of cockroaches following the crack and crevice or spot application technique to a limited area, it is technically feasible to assume that using the general surface treatment the efficacy levels will be the same or even higher. This is because a crack and crevice or spot application is a targeted or focused application to the area needed to be treated. The area of a crack

and crevice or spot application will therefore be less than that of a general surface treatment. Therefore, if the presented trials show control of cockroaches using a crack and crevice and/or spot application, then it can be concluded that the control achieved using a general surface application will be the same or even higher. Therefore, Intended Use 2 should be covered by the submitted trials which cover both the low and high rates to be claimed for control of crawling insects in both intended use scenarios of urban pest (Intended Use 1) and rural hygiene (Intended Use 2)."

Based on the results of the aforementioned efficacy studies, and considering the conclusions of the teleconference on 5 March 2019 and the outcome of the discussions of 34th CG meeting on 12 March 2019 concerning the Referral to the Coordination Group of a disagreement on Mutual recognition (MR) in accordance with Article 35(2) of the Regulation (EU) No 528/2012 (BPR) for Fendona 1.5SC, the intended uses of Fendona 6 SC, from an efficacy point of view, are acceptable as applied for by the applicant (2.2.1, tables 1 & 2), with the following limitations per target organism:

Cockroaches

In both intended uses 1 & 2, it is claimed that the residual activity of the product against crawling insects and cockroaches is up to 3 months.

The applicant in order to justify the 3-month residual activity against cockroaches using the data only from laboratory and simulated use-tests, provided the following statement, which is not accepted by the eCA: "The residual effect of the product was evaluated using the lab and simulated use tests submitted (Gibson, 2016d, Gibson 2016e and Gibson 2016f). In all those studies no differences in efficacy were observed between 1-day-treated and 3 month-treated materials. In both cases >90% efficacy after 24 h was achieved (refer to raw data tables). The reason for evaluating the residual activity in the lab and simulated use tests and not in the field was to avoid the imposition of having a professional pest control operator having to frequently enter the structure to evaluate the treatment and request that the owner not disturb the location of the trial – i.e. not cleaning or moving things around for a 90-day period. Maintaining access to a site for several months is never practically easy to arrange with the property owner. Thus, the efficacy in the lab and simulated use tests provide robust information of undisturbed material for 90 days in a way that a field trial for 90 days is very difficult in practice to achieve.".

The eCA notes that according to the TNsG, in case of general surface treatment by professionals against cockroaches, efficacy of the product needs to be supported by field studies. Normally, the same applies for the claimed crack and crevice treatment by professionals. Regardless, however, the category of use (professional or non-professional), the claimed crack and crevice treatment against cockroaches is appropriately proved through the submitted field studies using this particular application method.

The eCA also notes that according to the TNsG, for a general claim against crawling insects and cockroaches, efficacy should be proved against one small cockroach species (German cockroach) and one large cockroach species (Oriental or American cockroach).

Overall, based on the results of the lab studies by Gibson 2019 and the field study by Serrano 2012, Fendona 1.5SC (read across from Fendona 6SC) was effective against only German cockroaches for both intended uses 1 & 2 with the following limitations:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".

- For the intended use 2, "An application rate 15 mg/m² is set for high hygiene shelter places against cockroaches, otherwise an application rate 30 mg/m² should be used".
- Efficacy of the product against Oriental and American cockroaches is not sufficiently proved. Hence, the general claims against "cockroaches" and "crawling insects" are not sufficiently supported and will be removed from the authorized uses in the PAR and SPC.

Ants

In both intended uses 1 & 2, it is claimed that the residual activity of the product against ants is up to 3 months. Although efficacy against ants (*Lasius niger*) was proved for 3 months in the laboratory studies (Gibson 2016d, 2016e), in the submitted field studies the residual activity was proved for 28 days (Gibson 2016g, 2016h).

The applicant in order to justify the 3-month residual activity against ants—using the data only from laboratory tests, provided the following statement: "The reason for evaluating the residual activity in the lab and simulated use tests and not in the field, was to avoid the imposition of having a professional Pest Control Operator (PCO) having to frequently enter the structure to evaluate the treatment and request that the owner does not disturb the location of the trial i.e. not cleaning or moving things around for a 90-day period – this is difficult in practice to achieve. Thus, the efficacy in the lab studies provide robust information of undisturbed material for 90 days which supports the residual activity of the product, and so additional studies should not be required.".

The eCA notes that according to the TNsG, in case of general surface treatment by professionals against ants, efficacy of the product needs to be supported by field studies. Normally, the same applies for the claimed surface spotted treatment by professionals. Regardless, however, the category of use (professional or non-professional), the claimed spotted treatment against ants is appropriately proved through the submitted field studies using this particular application method.

- Hence, the eCA does not accept the aforementioned justification by the applicant, and proposes to address in both intended uses 1 & 2 that "Residual activity against ants (*Lasius niger*) is up to 1 month".

Flies

In the intended use 2, it is claimed that the product is intended to be used in animal houses against flying insects, including stable flies (*Stomoxys calcitrans*) and houseflies (*Musca domestica*), with residual activity of 3 moinths. The eCA notes that according to the TNsG, for application in animal houses against flies (houseflies, stable flies), field trials are normally required. However, in the submitted field studies by Estany 2016e and 2016f, the product performed low efficacy levels at both claimed doses against stable flies over a 3-weeks period in animal houses. Also, in the field studies by Latorre 2017a and 2017b the product performed low efficacy levels at both claimed doses against houseflies and stable flies over a 3-month period in animal houses.

Also, it is noted that according to the TNsG for a general claim against flying insects, tests against flies (houseflies + stable flies in case of use in animal houses) are required.

The applicant provided the following justification in order to justify how the low efficacy levels in the field studies by Latorre 2017a and 2017b could be used to support efficacy against houseflies and stable flies in animal houses (intended use 2): "It should be noted that stables and other animal buildings are considered very challenging situations in which to control houseflies, because of the continuous risk of reinvasion from adjacent premises. In these situations, even what is considered a low % of control - when comparing to other pests and/or other situations – is still perceived as a positive effect in these cases. Considering that the residual activity provided by some of the most widely used fly baits

does not exceed 35% in 5 weeks (please refer to the two attached published papers), this is the reason why multiple applications are recommended, the % population reduction provided by Fendona for up to 3 months after the application is expected to be highly appreciated in animal buildings".

- The eCA does not agree with the aforementioned justification and considers that in the intended use 2 (rural hygiene/ animal houses), the general claim for use against "flying insects" and the specific claims for use against "stable flies" (Stomoxys calcitrans) and "houseflies" (Musca domestica) are not adequately supported by the submitted efficacy studies, and therefore proposes not to include them into the target organisms of the product.

In the intended use 1, it is claimed that the product is intended to be used against flying insects, including houseflies (*Musca domestica*), with residual activity of 3 moinths. The eCA notes that according to the TNsG, for application in houses against houseflies, simulated use studies are normally required. However, the results of the submitted simulated use studies by Gibson 2016b and 2016c do not support efficacy of Fendona 6SC as surface spotted treatment against houseflies (*Musca domestica*).

- Hence, efficacy against "houseflies" and therefore the general claim against "flying insects" is not supported for the intended use 1.

Mosquitoes

In both intended uses 1 & 2, it is claimed that the product is intended to be used against flying insects, including mosquitoes (*Aedes aegypti, Culex spp*) with a residual activity up to 3 months.

It is noted that according to the TNsG, efficacy against *Culex* mosquitoes is required to support the general claims against "mosquitoes" and "flying insects". Also, for the claim against mosquitoes simulated use tests are required, while efficacy cannot be supported only by lab studies.

In the simulated use studies by Gibson 2018a and 2018b efficacy of the product as surface spotted treatment against *Culex quinquefasciatus* was proved on non-porous surfaces at 15 mg a.i./ m^2 , and on porous and on non-porous surfaces at 30 mg a.i./ m^2 , only with fresh deposits, noting however that mortality is achieved 48 hours after exposure of the insects to the treated surfaces.

The applicant provided the following statement, which is not accepted by the eCA, in order to justify how the low efficacy levels in the simulated use studies by Gibson 2018a and 2018b (81-81.5% and 86-87.5% "affected" mosquitoes at 15 and 30 mg a.s./m², respectively, for the 3-month deposits 24 hours post treatment), can be used to support the 3-month residual efficacy against *Culex* mosquitoes, and therefore against mosquitoes and flying insects: "Among flying insects, mosquitoes are some of the ones of the most difficult insects to control using a surface treatment. Based on Gibson 2017 a & b, there is a technical evidence of the intrinsic activity of the products (Fendona 6 SC and 1.5 SC) against Culex spp, even with 3-month undisturbed residues – they were forced to be in contact with treated surfaces and they could not select where to fly or settle. The potency of the product is confirmed with the 1-day results in Gibson 2018 a & b – where there was not a forced exposure. Regarding the 3-month results, although slightly lower are representative to what can be observed in the field, which is still an effective product to control Culex spp. These may be slightly below the criteria required to support control according to the TNsG, but this should not affect the general claim for control of flying insects with freshly applied product.".

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Overall, based on the results of the lab studies by Gibson 2017a and 2017b and the simulated use studies by Gibson 2018a, 2018b, 2016b and 2016c, efficacy of the product is sufficiently proved against mosquitos (*Culex spp.*) for both intented uses 1 & 2 with the following limitations:

For the intended use 1:

- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".

For the intended use 2:

- "Activity against mosquitos (*Culex spp.*) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces) at the low dose and on porous and non-porous surfaces at the high dose".
- "Mortality of mosquitos (*Culex spp.*) is achieved 48 hours after exposure of the insects to the treated surfaces".

It is noted also that the results of the simulated use tests by Gibson 2016b and 2016c do not support efficacy of Fendona 1.5SC (read across from Fendona 6SC) as surface spotted treatment against *Aedes aegypti* on porous and non-porous surfaces at 15 and 30 mg a.i./ m^2 , for 1 day and 3 months post treatment.

- Hence, the use against *Aedes* mosquitoes is not sufficiently supported by the efficacy data for both intended uses 1 & 2.

Wasps

Based on the results of the simulated use studies by Gibson 2018c and 2018d, efficacy of the product against wasps (*Vespula* spp.) has been proved for both intended uses 1 & 2 with the following limitations:

- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".

Litter beetles

Based on the results of the lab studies by Gibson 2016d and 2016e, and the simulated use studies by Gibson 2016b and 2016c, efficacy of the product against litter beetles has not been sufficiently proved for the intended use 2.

Bedbugs

Based on the results of the lab studies by Gibson 2017c and Lupkes 2012, and the field study by Foltan 2017, efficacy against bedbugs is sufficiently proven for the intended use 1 (15 mg a.i/m²) for up to 3 months post treatment, with the following limitations:

- "Mortality of bedbugs is achieved 1 week after exposure of the insects to the treated surfaces". "At least 1 re-application is required against bedbugs.".

Fleas

Based on the results of the simulated use study by Gibson 2017d, efficacy of the product against fleas has not been sufficiently proved for the intended use 1.

- In intended use 1, it is claimed that "For flying insects, Fendona 6 SC should be applied throughout the infested area as a coarse spray onto targeted spots or areas where insects may crawl or settle". However, we propose to delete the word "crawl" as not applicable for flying insects.
- The application method in intended use 2 should be clarified as follows": "Fendona 1.5SC should be applied throughout the infested area as a coarse spray for surface treatment. Special attention should be paid to cracks, crevices and any place where insects may hide and on surfaces over which they may crawl or settle."

Overall, based on the submitted efficacy studies and after evaluation process in all sections, the eCA concludes into the proposed authorized uses of the product as described in 2.1.4.

Major change application

Conclusion on the efficacy of the product based on trials submitted to support the MAC

The applicant submitted a major change application in order to include the Intended Use 1 (Urban pest control) as shown in the highlighted table in 2.2.1 (Major change application – Intended uses as applied for by applicant) along with the following claimed instructions for use in terms of efficacy:

Following application, insects that have contacted the deposit should show signs of knockdown within 30 – 60 minutes with noticeable impact on population numbers expected within a few days. Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces. Noticeable knockdown effect on bedbugs is expected within 24 h after contact with treated surfaces and mortality is achieved 1 week after exposure. For the control of bedbugs at least 1 re-application is required. Mortality of mosquitos (*Culex spp.*) is achieved between 2 and 4 days after exposure of the insects to the treated surfaces. Noticeable knockdown effect on houseflies is expected within 6 hours after contact with the treated surfaces and mortality is achieved 24-72 hours after exposure. Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours. Treated areas should be re-inspected after 2– 3 weeks. Where initial infestation was severe or new infestation is observed, a second application may be required particularly if the first treatment has been disturbed or some harbourages/landing sites were missed in the initial application.

Strategies for managing the development of resistance:

- Where possible, application treatments should be recommended to be combined with non-chemical measures.
- To avoid the potential for insect resistance to Fendona 6SC, treatments should be alternated with insecticidal products having different modes of action.
- If resistance is confirmed, stop the use of Fendona 6SC immediately and rotate to an insecticide with alternative mode of action. By removing the selection pressure, the less-fit, resistant individuals will be removed over time and susceptibility should return to the population.
- Apply the recommended label dose rate during the proper timing to ensure complete control of the pest species. By allowing the fewest insects to survive, the spread of the resistant insects will be slowed.

- Follow good application techniques in order to maximize the product activity; deficient applications at less than the recommended label rate will allow the surviving insects to build up the population again, increasing the pest pressure against the product, which may trigger resistance problems in the future.
- Establish a baseline and monitor levels of effectiveness on populations in key areas in order to detect any significant changes in susceptibility to active substance. Information from resistance monitoring programs allows early detection of problems and gives information for correct decision making.
- The users should inform if the treatment is ineffective and report straightforward to the authorization holder. The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.

In addition to the several efficacy studies (laboratory, simulated use and field studies) originally submitted for the MRP Fendona 1.5 SC dossier, using the bridging approach, and the studies conducted with Fendona 6 SC, one new study (Gibson 2019b) against mosquitoes and houseflies has been submitted by the applicant and included in the PAR to support the efficacy of Fendona 1.5 SC indoors in urban pest control (Intended use 1) by non-professionals at 15 mg a.s./m² against the following target pests:

- Crawling insects: German cockroaches (*Blattela germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*)
- Flying insects, including houseflies (*Musca domestica*), mosquitoes (*Culex* spp) and wasps (*Vespula* spp)

Taking into consideration the efficacy evaluation already performed by the eCA for both intended uses 1 & 2 based on the efficacy studies submitted for MRP Fendona 1.5SC dossier, the new submitted study by Gibson 2019b, and the conclusions of the teleconference on 5 March 2019 and the outcome of the discussions of 34th CG meeting on 12 March 2019 concerning the Referral to the Coordination Group of a disagreement on Mutual recognition (MR) in accordance with Article 35(2) of the Regulation (EU) No 528/2012 (BPR) for Fendona 1.5SC, the intended use 1 (urban pest control) of Fendona 1.5 SC, from the efficacy point of view, is acceptable as applied for a major change by the applicant (2.2.1), noting that:

In urban pest control (Intended use 1) the product is efficacious against German cockroaches (*Blattella germanica*), ants (*Lasius niger*) and bedbugs (*Cimex lectularius*), as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide; and against flying insects including houseflies (*Musca domestica*), mosquitoes (*Culex spp.*) and wasps (*Vespula spp*), as a coarse spray onto targeted spots or areas where insects may settle, with the following limitations per target organism:

- "Activity against German cockroaches is achieved only with fresh deposits.".
- "Mortality of German cockroaches is achieved 1 week after exposure of the insects to the treated surfaces".
- "Residual activity against ants (Lasius niger) is up to 1 month".
- "Activity against mosquitoes (*Culex* spp.) is achieved only with fresh deposits on non-porous surfaces (not on porous surfaces)".
- "Mortality of mosquitoes (Culex spp.) is achieved between 2 and 4 days after exposure of the insects to the treated surfaces".
- "Noticeable knockdown effect on houseflies is expected within 6 hours after contact with the treated surfaces and mortality is achieved 24-72 hours after exposure".

- "Residual activity against wasps (*Vespula* spp.) is achieved only on non-porous surfaces (not on porous surfaces) for up to 3 months".
- "Noticeable knockdown effect on wasps is expected within 6 hours after contact of the insects with non-porous treated surfaces and mortality is achieved at 24 hours".
- "Noticeable knockdown effect on bedbugs is expected within 24 h after contact with treated surfaces and mortality is achieved 1 week after exposure".
- "For the control of bedbugs at least 1 re-application is required".

2.2.5.9 Relevant information if the product is intended to be authorised for use with other biocidal product(s)

The biocidal product is not intended to be used with other products including other biocidal products.

2.2.6 Risk assessment for human health

2.2.6.1 Assessment of effects on Human Health

The toxicological properties of the active substance (a.s.) alpha-cypermethrin are summarised in the CA report (RMS BE).

Acute toxicity tests as well as tests for skin and eye irritation and skin sensitisation have not been conducted with the biocidal product (b.p.) Fendona 1.5 SC. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties.

Considering the obtained results of the toxicity studies conducted with Fendona 6 SC, a classification of the b.p. Fendona 1.5 SC with respect to acute toxicity, skin irritation/corrosion, eye damage/irritation and skin sensitisation is not required.

Skin corrosion and irritation

(cf. IUCLID Section 8.1)

	Summary table of in vitro studies on skin corrosion/irritation					
Method, Guideline, GLP status, Reliability	Species, Strain, Sex, No/group	Test substance, Vehicle, Dose levels, Duration of exposure	Results Average score (24, 48, 72h)/ observations, reversibility	Remarks	Reference	
Skin irritation in vivo, OECD 404, GLP: yes, RL 2	Rabbit, New Zealand White, 4 males and 2 females	Fendona 6 SC (product used for read across), Unchanged (no vehicle), 100%, 4 h	Mean scores of 6 animals (24, 48, 72 h): erythema: 0.33 oedema: 0.0 erythema: fully reversible within 72 h, oedema: not applicable	no experimental 48 h reading performed (the 48 h values were assumed to be the same as those at 24 h)	(2008a) Section No. in IUCLID: 8.1	

For skin corrosion and irritation no human data is available.

Conclusion used in Risk Assessment – Skin corrosion and irritation		
Value/conclusion	Not irritating	
	A dermal irritation study similar to OECD Guideline 404 is available for Fendona 6 SC. However, as no experimental 48 hr reading was performed, the study is not considered acceptable. The applicant's	

Fendona 1.5 SC PT18 Greece

	approach to assume that the 48 hrs scores are the same as those at 24 hrs is considered arbitrary. Based on the above, and in order to conclude on the skin irritation potential of Fendona 6 SC the calculation method in accordance with the criteria laid down in Regualtion (EC) No 1272/2008, has been applied. No classification is triggered for skin irritation properties. The detailed assessment is included in the confidential Annex of the PAR.
Classification of the product according to CLP	Not classified

Data waiving	
Information requirement	Study scientifically unjustified.
Justification	No dermal irritation study with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the calculation method conducted for Fendona 6 SC, a classification of the b.p. Fendona 1.5 SC with respect to skin irritation is not required.

Eye irritation (cf. IUCLID Section 8.2)

Summ	Summary table of in vitro studies on serious eye damage and eye irritation				
Method, Guideline, GLP status, Reliability	Species, Strain, Sex, No/group	Test substance,Dose levels, Duration of exposure	Results Average score (24, 48, 72h)/ observations, reversibility	Remarks	Reference
Eye irritation in vivo, OECD 405, GLP: yes, RL 1	Rabbit, New Zealand White, 5 males	Fendona 6 SC (product used for read across), Unchanged (no vehicle), 100%,	Mean score of 5 animals (24, 48, 72 h): Cornea: 0 Iris: 0 Conjunctivae: 0		(2008b) Section No. in IUCLID:
		24 h	Chemosis: 0 Reversibility: not applicable		8.2

For eye damage and eye irritation no human data is available.

Conclusion used in Risk Assessment – Eye irritation	
Value/conclusion	Not irritating

Justification for the value/conclusion	The eye irritation potential of the test substance Fendona 6 SC was tested in 5 young adult male New Zealand White rabbits similar to OECD Guideline 405. At all evaluation time points the individual mean scores for cornea, iris, conjunctivae and chemosis were 0.
Classification of the product according to CLP	Not classified

Data waiving	
Information requirement	Study scientifically unjustified.
Justification	No eye irritation study with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alphacypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the eye irritation study conducted with Fendona 6 SC, a classification of the b.p. Fendona 1.5 SC with respect to eye irritation is not required. For details on the study performed with Fendona 6 SC please refer to

Respiratory tract irritation

For respiratory tract irritation no human data is available.

Conclusion	Conclusion used in the Risk Assessment – Respiratory tract irritation		
Value/conclusion	Not irritating to the respiratory tract.		
Justification for the conclusion	No data on respiratory tract irritation is available for the b.p. Toxicological properties and classification of the b.p. was deduced from the respective properties of the a.s. and the co-formulants using the the criteria for classifying mixtures under Regulation (EC) No 1272/2008 (CLP).		
Classification of the product according to CLP	Not classified		

Data waiving	
Information	Study scientifically unjustified
requirement	
Justification	The a.s. alpha-cypermethrin is classified with STOT SE 3, H335: May cause respiratory irritation. The concentration of alpha-cypermethrin in the b.p. is 1.47% (w/w), and thus, below the trigger of 20% as provided for in the CLP regulation. The b.p. contains not more than one substance classified with STOT SE Category 3. Therefore, the b.p. has not to be classified with respect to STOT SE Category 3 effects.

Skin sensitization

(cf. IUCLID Section 8.3)

Summary table of animal studies on skin sensitisation							
Method, Guideline, GLP status, Reliability	Species, Strain, Sex, No/group	Test substance, Vehicle, Dose levels, duration of exposure Route of exposure	Results (Number of animals sensitized/total number of animals)	Remarks	Reference		
Buehler test, OECD 406, GLP: yes, RL 1	Guinea pigs, New Zealand White, Male, 10 (control group), 20 (treated group)	Fendona 6 SC (product used for read across), Unchanged (no vehicle), Induction and challenge: 100%, epicutaneous	Negative control: 0/10 Test group: 0/20		(2008c) Section No. in IUCLID: 8.3		

For skin sensitisation no human data is available.

Conclusion used in F	Conclusion used in Risk Assessment – Skin sensitisation			
Value/conclusion	Not sensitising			
Justification for the value/conclusion	A study for skin sensitisation in guinea pigs was conducted with the test substance Fendona 6 SC using the Buehler Test Method (OECD Guideline 406, 1997). No skin reactions were observed upon challenge with test substance.			
Classification of the product according to CLP	Not classified			

Data waiving	
Information	Study scientifically unjustified.
requirement	
Justification	No study for skin sensitization with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the study for skin sensitisation conducted with Fendona 6 SC, a classification of the b.p. Fendona 1.5 SC with respect to skin sensitisation is not required. For details on the study performed with Fendona 6 SC please refer to (2008c).

Respiratory sensitization (ADS) (cf. IUCLID Section 8.4)

For respiratory sensitisation no human data is available.

Conclusion used in Risk Assessment - Respiratory sensitisation				
Value/conclusion	Not sensitising.			
Justification for the value/conclusion	No data on respiratory sensitisation is available for the b.p. Toxicological properties and classification of the b.p. was deduced from the respective properties of the a.s. and the co-formulants using the criteria for classifying mixtures under Regulation (EC) No 1272/2008 (CLP).			
Classification of the product according to CLP	Not classified.			

Data waiving	
Information	Study scientifically unjustified.
requirement	
Justification	According to chapter 8.4 "Respiratory sensitisation" of the "Guidance on information requirements" (Version 1.1, ECHA Nov. 2014), testing on the product/mixture does not need to be conducted if there are valid data available on each of the components in the mixture sufficient to allow classification of the mixture according to the rules laid down in Regulation (EC) No 1272/2008 (CLP). The toxicity of the a.s. and the co-formulants is known. Thus, toxicological properties and classification of the b.p. can be deduced from the respective properties of the a.s. and the co-formulants using the criteria for classifying mixtures under CLP. Following evaluation of the a.s. alpha-cypermethrin by the Rapporteur Member State (RMS) Belgium, no indication was reported from the studies performed that alpha-cypermethrin would cause respiratory sensitisation. In the b.p. neither the a.s. nor any of the co-formulants is classified with respect to a respiratory sensitisation. Therefore, the b.p. does not need to be classified with respect to respiratory tract sensitisation.

Acute toxicity

Acute toxicity by oral route (cf. IUCLID Section 8.5.1)

	Summary table of animal studies on acute oral toxicity							
Method Guideline GLP status, Reliability	Species, Strain, Sex, No/group	Test substance Dose levels, Type of administrati on	Signs of toxicity	Value LD50	Remarks	Referen ce		
Acute Oral	Rat,	Fendona 6 SC	No mortality,	> 2000				
Toxicity in	Wistar,	(product used	No clinical signs of	mg/kg				
Rats,	Female,	for read	toxicity,	bw		(2008a)		
OECD 423,	6 (3 per	across),	No effects on body					
GLP: yes,	step)	100%,	weight,			Section		
RL 1		2000 mg/kg	No pathology			No. in		
		bw,	changes at			IUCLID:		
		Gavage	necropsy			8.5.1		

For acute oral toxicity no human data is available.

Value used in the	Value used in the Risk Assessment – Acute oral toxicity			
Value	Not harmful			
Justification for the selected value	An acute oral toxicity study according to the Acute Toxic Class Method of OECD Guideline 423 (2001), six young female rats (Wistar), were given a single oral dose, by gavage, of the test item Fendona 6 SC at the limit dose of 2000 mg/kg bw. There were no mortalities or any signs of toxicity, all animals gained the expected weight. No pathology changes were observed at necropsy. The oral LD $_{50}$ exceeds 2000 mg/kg bw.			
Classification of	Not classified			
the product				
according to CLP				

Data waiving	
Information requirement	Study scientifically unjustified.
Justification	No acute oral toxicity study with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the acute oral toxicity study conducted with Fendona 6 SC, the b.p. Fendona 1.5 SC has not to be classified regarding acute oral toxicity. For details on the study performed with Fendona 6 SC please refer to (2008a).

<u>Acute toxicity by inhalation</u> (cf. IUCLID Section 8.5.2)

	Summary table of animal studies on acute inhalation toxicity						
Method, Guideline, GLP status , Reliability	Species, Strain, Sex, No/group	Test substance, form and particle size (MMAD) Concentration, Type of administration	Signs of toxicity	LC50	Remarks	Refere nce	
Acute inhalation toxicity study in rats OECD 403, GLP: yes, RL 1	Rat, Wistar / HanBrl: WIST (SPF), male/femal e, 5	Fendona 6 SC (product used for read across), Aerosol, MMAD: 4.8 and 5.3 µm, 2.06 mg/L (mean analytical concentration), Nose/head only	No mortality, Visually accelerated respiration, squatting posture and smeared fur in all animals (reversible), Tremor in 2 male and 2 female rats (reversible), No effects on body weight (exception: mean body weight of the female animals decreased slightly during the first post exposure period), No gross pathological	> 2.06 mg/L	2.06 mg/L is the maximum attainable measured aerosol concentration	(2004) Section No. in IUCLID : 8.5.2	

For acute inhalation toxicity no human data is available.

Value used in the	e Risk Assessment – Acute inhalation toxicity
Value	Not harmful
Justification for the selected value	Fendona 6 SC was tested for acute inhalation toxicity in male and female rats in accordance with OECD Guideline method 403. No mortality did occur. Reversible signs of visually accelerated respiration, squatting posture and smeared fur were observed in all exposed animals. Tremor was observed in 2 male and 2 female rats. Clinical findings were observed from beginning of exposure until including study day 3. The mean body weight of the male animals increased throughout the whole study period. The mean body weight of the female animals decreased slightly during the first post exposure week but increased during the second week. No gross pathological abnormalities were noted in the animals necropsied at termination of the post exposure observation period. The 4 h LC ₅₀ exceeds 2.06 mg/L air (maximum attainable measured aerosol concentration).
Classification of the product	Not classified
according to CLP	

Data waiving	
Information	Study scientifically unjustified.
requirement	
Justification	No acute inhalation toxicity study with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the acute inhalation toxicity study conducted with Fendona 6 SC, the b.p. Fendona 1.5 SC has not to be classified regarding acute inhalation toxicity. For details on the study performed with Fendona 6 SC please refer to (2004).

Acute toxicity by dermal route (cf. IUCLID Section 8.5.3)

	Summary table of animal studies on acute dermal toxicity							
Method, Guideline, GLP status, Reliability	Species, strain, Sex, No/group	Test substance, Vehicle, Dose levels, Surface area	Signs of toxicity	LD50	Remarks	Refere nce		
Acute Dermal Toxicity in Rats,	Rat, Wistar, Male/female, 5	Fendona 6 SC (product used for read across),	No mortality, No clinical signs of toxicity,	> 2000 mg/kg bw		(2008b)		
OECD 402, GLP: yes, RL 1		Unchanged (no vehicle), 2000 mg/kg bw, 10% of body surface	No effects on body weight, No gross pathological abnormalities			Section No. in IUCLID: 8.5.3		

For acute dermal toxicity no human data is available.

Value used in the Risk Assessment – Acute dermal toxicity					
Value	Not harmful				
Justification for the selected value	In an acute dermal toxicity study according to OECD Guideline 402, rats were exposed to the test item Fendona 6 SC in a limit test. No mortalities or signs of overt toxicity were observed; all animals gained the expected weight. The dermal LD_{50} for male and female rats exceeds 2000 mg/kg bw.				
Classification of the product according to CLP	Not classified				

Data waiving						
Information	Study scientifically unjustified.					
requirement						
Justification	No acute dermal toxicity study with the b.p. Fendona 1.5 SC was conducted. However, the product Fendona 1.5 SC containing 1.47% alpha-cypermethrin is very similar to the b.p. Fendona 6 SC that contains 5.83% alpha-cypermethrin. Both products are water-based. Regarding the b.p. Fendona 6 SC, the concentrations of other ingredients of toxicological relevance are higher or equal compared to Fendona 1.5 SC. Therefore, it is assumed that the toxicological characteristics of Fendona 6 SC represent a worst case for the related b.p. Fendona 1.5 SC allowing bridging of the toxicological properties. Considering the results of the acute dermal toxicity study conducted with Fendona 6 SC, the b.p. Fendona 1.5 SC has not to be classified regarding acute dermal toxicity. For details on the study performed with Fendona 6 SC please refer to (2008b).					

Information on dermal absorption (*cf.* IUCLID Section 8.6)

Summary table of in vitro studies on dermal absorption									
Method, Guideline, GLP status, Reliability	Species, Number of skin samples tested per dose, Other relevant information about the study	Test substance, Doses	Absorption data for each compartment and final absorption value	Remarks	Reference				
OECD 428, GLP: yes Reliability 1	Human skin, 8 replicates, 8 h exposure, 24 h monitoring	BAS 310 27 I (Fendona 6 SC, product used for read across) concentrate, 60 mg/mL alpha-cypermethrin, Label: [14C]-alpha-cypermethrin BAS 310 27 I (Fendona 6 SC, product used for read across), 15 mg/mL alpha-cypermethrin, Label: [14C]-alpha-cypermethrin	Absorbed dose: 0.45 ± 0.25% (for absorption data for each compartment please refer to the table below) Absorbed dose: 0.82 ± 0.26% (for absorption data for each compartment please refer to the table below)	> 75% of total absorption occurred within half of the study duration > 75% of total absorption occurred within half of the study duration	(2016) Section No. in IUCLID: 8.6				
		BAS 310 27 I (Fendona 6 SC, product used for read across), 0.3 mg/mL alpha-cypermethrin, Label: [14C]-alpha-cypermethrin	Potentially absorbed dose: 3.06 ± 2.22% (for absorption data for each compartment please refer to the table below)	< 75% of total absorption occurred within half of the study duration, one cell was not included in statistics					

In-vitro dermal penetrat hum			hrin formu ta (Rieken,		S 310 27 I t	hrough
		dose		dose	Low d	ose
Dose group	BAS 310 27 I concentrate		Spray dilution 1:4		Spray dilution 1:200; equiv. to in-use dilution	
Target concentration [mg/mL]	6	0	1	5	0.3	
Target dose [µg/cm²]	60	00	15	50	3	
Mean actual applied dose [µg/cm²]	582	2.08	149).43	2.90	5
Number of cells used/Valid cells	8	3	8	3	7	
	Recove	ry [%]	Recove	ry [%]	Recover	y [%]
	Mean	S.D.	Mean	S.D.	Mean	S.D.
Dislodgeable dose						
Skin washing after 8 hours	95.80	2.54	97.65	1.44	91.04	6.08
Skin washing after 24 hours	0.12	0.09	0.30	0.49	4.82	4.61
Donor chamber wash	0.02	0.01	0.01	0.02	0.00	0.00
Dose associated to skin						
Tape strips: 1 st sample, strips 1 + 2	0.02	0.02	0.01	0.01	0.29	0.23
Tape strips: 2 nd sample; strips 3 - 6	0.03	0.02	0.01	0.01	0.92	0.76
Skin preparation	0.10	0.12	0.11	0.10	1.52	1.38
Absorbed dose						
Sum receptor samples incl. wash out	0.13	0.08	0.30	0.06	0.15	0.07
Receptor fluid	0.11	0.06	0.19	0.05	0.38	0.15
Receptor chamber wash	0.12	0.06	0.23	0.07	0.10	0.06
Total recovery ¹	96.44	2.48	98.81	1.29	99.22	0.70
Absorption essentially complete at end of study (>75% absorption within half the study duration)	Yes		Y	es	No (72	2%)
Absorption estimates when absorption not essentially completed (= absorbed dose + dose associated to skin + tape strips sample 2) ²	N	Α	NA		3.06	2.22
Absorption estimates when absorption essentially completed (= absorbed dose + dose associated to skin)	0.45	0.25	0.82	0.26	NA	
Absorption estimate normalized ³	N	Α	NA NA			

Relevant absorption estimate ⁴	0.70	1.08	5.28
Absorption estimates used for risk assessment ⁴	0.7	1	5

¹ values may not calculate exactly due to rounding of figures

 $^{^3}$ Cells with insufficient recovery (<95%) were corrected by normalization of absorption estimate to 100% recovery 4 In accordance with the EFSA Guidance on Dermal Absorption (EFSA Journal 2012;10(4):2665) one standard deviation was added to the mean% dermal penetration in cases where the standard deviation was \geq 25% of the mean value. This value was then rounded to the required number of significant figures.

Values used in t	Values used in the Risk Assessment – Dermal absorption						
Substance	Fendona 1.5 SC, concentrate	Fendona 1.5 SC, in-use dilution					
Values	1%	5%					
Justification for the selected values	Dermal absorption has been set to 1% derived from the <i>in vitro</i> human dermal penetration study for the concentrates containing 15 mg/mL (1.47% w/v) alphacypermethrin.	Dermal absorption has been set to 5% derived from the <i>in vitro</i> human dermal penetration study for the in-use dilutions containing 0.03% or higher amounts (i.e. 0.06%) of alpha-cypermethrin (taken into account the generally inverse relationship between concentration and dermal absorption).					

Data waiving	
Information	Study scientifically unjustified.
requirement	
Justification	No dermal absorption study with the b.p. Fendona 1.5 SC containing 1.47% (w/w) alpha-cypermethrin was conducted. However, dermal absorption of alpha-cypermethrin was studied <i>in vitro</i> by application of Fendona 6 SC concentrate (containing 5.83% (w/w) alpha-cypermethrin) and two aqueous dilutions (1:4 (v/v) and 1:200 (v/v)) to human skin samples. The dermal absorption study resulted in absorption estimates of 1% and 5% for the 1:4 (v/v) and the 1:200 (v/v) dilution of Fendona 6 SC, respectively. The two aqueous dilutions of Fendona 6 SC concentrate represent Fendona 1.5 SC concentrate and in-use dilution. Moreover, both products are water-based. Hence, the applicant proposes to use the absorption estimates of the study conducted with Fendona 6 SC for the risk assessment of Fendona 1.5 SC concentrate and in-use dilution. For details on the study performed with Fendona 6 SC please refer to (2016).

Available toxicological data relating to non active substance(s) (i.e. substance(s) of concern)

² In accordance with the EFSA Guidance on Dermal Absorption (EFSA Journal 2012;10(4):2665) the radioactivity in the second tape-strip pool (3rd to 6th tape strip) is considered potentially absorbable if less than 75% of the absorption occurred in the first half of the study. Finally, the skin preparation is also considered potentially absorbable.

Fendona 1.5 SC contains 1,2-Propylene Glycol at levels of 13.98%. An IOEL of 10 mg/m³ for 1,2-Propylene Glycol is available in the GESTIS International Limit Values (http://limitvalue.ifa.dguv.de/ and as such, it should be considered as a SoC.

Available toxicological data relating to a mixture

Toxicological data relating to a mixture that a substance of concern is a component of are not required.

ED Hazard assessment of the product

Active substance alpha-cypermethrin:

According to the BPC Opinion on the application for approval of the active substance Alphacypermethrin PT18 (ECHA/BPC/009/2014), Alpha-cypermethrin is not classified as Carc. 2 or Repr. 2 and has not been identified as having endocrine disrupting properties.

Co-formulants:

Based on the information included in the Material Safety Data Sheets (MSDSs) none of the co-formulants is classified for carcinogenic or reproductive toxicity properties or as STOT-RE (May cause damage to the thyroid through prolonged or repeated exposure).

In addition, none of the co-formulants is included in the Candidate List of SVHCs (https://echa.europa.eu/candidate-list-table) and either of them has been assessed under REACH Substance Evaluation (https://echa.europa.eu/information-on-chemicals/evaluation/community-rolling-action-plan/corap-table) due to an initial concern regarding potential endocrine disruption.

Other

Germ Cell Mutagenicity, Carcinogenicity and Reproductive Toxicity:

Neither alpha-cypermethrin nor any of the co-formulants are classified for germ cell mutagenicity, carcinogenicity and reproductive toxicity, respectively. Thus, the b.p. does not need to be classified for germ cell mutagenicity, carcinogenicity or reproductive toxicity.

Specific Target Organ Toxicity - Repeated Exposure (STOT-RE):

The a.s. alpha-cypermethrin is classified with STOT-RE 2; H373: May cause damage to the Central Nervous System through prolonged or repeated exposure. The concentration of alpha-cypermethrin in the b.p. is 1.47% (w/w), and thus, below the trigger value of 10% as provided in the CLP regulation for classifying a mixture as STOT-RE 2. Thus, the b.p. does not need to be classified for STOT-RE effects.

The b.p. contains 1,2-benzisothiazolin-3-one that is classified as sensitising to skin. The specific concentration limit of 0.05% is specified. Since the sensitising substance is present at a concentration greater than one tenth of the specific concentration limit, the b.p. is labelled with EUH208 "Contains 1,2-benzisothiazolin-3-one. May produce an allergic reaction".

Alpha-cypermethrin belongs to the group of synthetic pyrethroids. The following statement is added to the label: "The product contains: Alpha-cypermethrin. May cause paraesthesia."

The b.p. is used as insecticide in domestic and rural environments by professionals and general public. The treatment of animal house surfaces with alpha-cypermethrin-containing insecticidal product may lead to residues in animal commodities (meat, milk, eggs).

Cow feeding study

(cf. IUCLID Section 8.8)

Study Reference	Dose groups ¹	Residues found in milk ² [mg/kg milk]	Residues found in muscle, liver, kidney ³ [mg/kg tissue]	Residues found in fat ³ [mg/kg tissue]
Oral feeding for	Α.	No detectable	No detectable	No detectable
28 days,	control	residues	residues	residues
	В.	No detectable	No detectable	0.058 - 0.064
3 cows/group,	77 mg/animal/day 0.188 mg/kg bw/day	residues	residues	
Test substance:	C.	0.02	No detectable	0.16
alpha-	231 mg/animal/day		residues	
cypermethrin	0.354 mg/kg bw/day			
	D.	0.08	No detectable	0.87
	769 mg/animal/day		residues	
(2003)	1.183 mg/kg bw/day			

¹ Body weight of dairy cattle: 650 kg

At the lowest feeding level (77 mg/animal/day), residues of alpha-cypermethrin were present only in fat (0.058-0.064 mg/kg). All samples of whole milk from the low dose group were below the limit of determination of the analytical method (0.010 mg/kg) for alpha-cypermethrin.

No **pig** feeding study available, thus the cow feeding study was used as to estimate the feeding levels in pigs.

As to justify this approach the conclusion from the Annex I Renewal of alpha-cypermethrin under Regulation (EC) N° 1107/2009 was considered.

In the data review process for Annex I Renewal under plant protection product regulation (EC) N° 1107/2009, the following statement is cited in the section Metabolism in livestock (Regulation (EU) N° 283/2013, Annex Part A, points 6.2.2, 6.2.3, 6.2.4, 6.2.5 6.7.1): "The general metabolic pathway in rodents (rats) and ruminants (goats) is comparable".

Therefore, additional studies for the generation of data in relation to the nature of the residues in pigs derived as results of the exposure towards alpha-cypermethrin exposure via plant protection products or biocides was not considered required. Based on the demonstrated similarity of metabolism in two species (rat and cow), the feeding study results from the cow feeding study was further considered appropriate to derive residue results for pigs as a worst case approach in order to investigate the dietary risk of consumers.

Thus, based on the medium treatment group of the cow feeding study equivalent feeding levels would be:

Fattening pig: 0.354 mg/kg bw/day x 100 kg = 35.4 mg / animal / dayBreeding pig: 0.354 mg/kg bw/day x 260 kg = 92.0 mg / animal / day

At medium cow feeding level (231 mg/animal/day) residues of alpha-cypermethrin are present only in fat (0.16 mg/kg) and milk (<0.02 mg/kg).

² Limit of detection: 0.01 mg/kg milk

³ Limit of detection: 0.05 mg/kg tissue

Hen Feeding Study

(cf. IUCLID Section 8.8)

Study Reference	Dose groups ¹	Max Residues found in egg ² [mg/kg egg]	Max Residues found in muscle, liver, kidney ³ [mg/kg tissue]	Max Residues found in fat ³ [mg/kg tissue]
Oral feeding for	A.	No detectable	No detectable	No detectable
28 days,	control	residues	residues	residues
	В.	No detectable	No detectable	No detectable
12 hens/group,	0.68 mg/animal/day	residues	residues	residues
	0.076 mg/kg bw/day			
Test substance:	C.	0.0125	No detectable	0.085
alpha-	0.72 mg/animal/day		residues	
cypermethrin	0.38 mg/kg bw/day			
	D.	0.023	No detectable	0.353
	2.00 mg/animal/day		residues	
(2001)	0.76 mg/kg bw/day			

At lowest feeding level (0.68 mg/animal/day) no residues of alpha-cypermethrin are detectable in eggs, muscle, liver or fat.

¹ Body weight of laying hen: 1.9 kg ² Limit of detection: 0.01 mg/kg egg ³ Limit of detection: 0.05 mg/kg tissue

2.2.6.2 Exposure assessment

<u>Identity</u>

Fendona $1.5~\rm SC$ is a water-based product containing $1.5\%~\rm w/v$ of the a.s. alphacypermethrin with co-formulants as given in the confidential part of the dossier.

The molecular weight is 416.3 g/mol. The pure active ingredient (PAI) has a vapour pressure of 3.8 x 10^{-7} Pa at 20°C and is considered of low volatility. Technical alpha-cypermethrin has a water solubility of 3 μ g/L at 20°C and pH 6.5.

Intended use and user sector

Fendona 1.5 SC is intended as a crack and crevice treatment to any surface where the insect pests may crawl or settle for use in domestic households / private areas and animal houses/shelters (stables, cattle sheds, pig units, poultry houses).

The intended use-rate range from 15 mg a.s./m² corresponding to 100 mL Fendona 1.5 SC in 5 L water for 100 m^2 , which corresponds to a dilution of 1:50 (domestic pest control by amateurs, animal buildings by professionals and amateurs) to 30 mg a.s./m², corresponding to 200 mL Fendona 1.5 SC in 5 L water for 100 m^2 , i.e. 1:25 (animal buildings by professionals and amateurs). The application volume per m^2 is 50 mL.

An overview of the intended worst case uses for Fendona 1.5 SC is given in the following table:

Application rate	User type	Worst case scenario	Use situation
	Professional (trained and pest control operator PCO)	Surface Treatment / low	Animal buildings / Rural
30 mg a.s./m ² *	non-professional (Amateur user / consumer)	pressure spray (low pressure)	(indoor)
15 mg a.s./m²	non-professional (Amateur user / consumer)	Crack and crevice / low pressure spray (low pressure)	Domestic (indoor)

 $[^]st$ This application rate also covers the rural low concentration rate scenario at 15 mg a.s. / m 2

Exposure data

Generic information on human exposure to water-based insecticidal products to control other athropods is given in the "Best practice Guideline (BPG (PT 18)) and in the technical notes for quidance (EC, DG environment 2002).

Product use

Overview of primary exposure to Fendona 1.5 SC

Exposed population	Exposure Situation	Worst case scenario	Exposure Routes
Professional (trained and pest control operator PCO)*	Animals buildings (indoor)	Surface treatment / low pressure spray (low pressure) at 30 mg a.s./m ²	Inhalation, dermal during mixing/loading/application
non-professional (Amateur user / consumer)*	Animals buildings (indoor)	Surface treatment / low pressure spray (low pressure) at 30 mg a.s./m ²	Inhalation, dermal during mixing/loading/application
non-professional (Amateur user / consumer)	Domestic (households/private areas, indoor)	Crack and crevice / low pressure spray (low pressure) at 15 mg a.s./m ²	Inhalation, dermal during mixing/loading/application

^{*}Covers rural pest control at 15 mg a.s./m²

Post-application

Post-application is limited to unblocking nozzles and replacing seals (professionals).

Disposal

Products are generally used up. Packaging is returned to the supplier or treated as special waste (professional) or domestic waste (non-professional).

Secondary exposure

Secondary exposure can occur either by acute exposure or chronically to individuals after prolonged exposure. As a worst case it is assumed that treated areas are indoors without ventilation. Different scenarios are considered; in the rural pest control scenario it is assumed that secondary exposure is either acute and affects adults via inhalation and dermal by accidental contamination from treated areas or chronic for professional users that launder contaminated working clothes at home. The other scenarios are specific for the domestic area, where exposure can either affect adults, children, toddlers and infants by multiple exposure routes when entering and/or accidentally touching treated areas. Taking into account that for domestic areas the maximum number of applications is 11 per year (see Point 2.1.4.1 of PAR, Use description #1) this scenario is considered as chronic.

An overview of the expected secondary exposure scenarios for Fendona 1.5 SC is given in the following tables.

Application rate Worst case scenario		Use Situation	Exposed Bystander Populations
15 mg a.s. /m²	Crack and crevice / low pressure spray (low pressure)	Domestic (indoor)	Adults, children, infants, toddlers
30 mg a.s. /m²	Surface treatment / low pressure spray (low pressure)	Animal buildings / rural (indoor)	Adults

Exposure situation	Exposed bystander populations	Acute exposure route	Chronic exposure route
Domestic (indoor)	Adults Children Toddlers Infants	Inhalation, dermal Inhalation, dermal Inhalation, dermal, oral Inhalation, dermal, oral	(Inhalation), dermal
Animal buildings / rural scenario (indoor)	Adults	Inhalation, dermal	(Inhalation), dermal

Identification of main paths of human exposure towards active substance(s) and substances of concern from its use in biocidal product

	Summary table: relevant paths of human exposure						
	Primary (dir	ect) exposure	e	Secondary (indirect) exposure			
Exposure path	Industrial use	Profession al use	Non- professiona I use	Industri al u Exposu re of the genera I public se	Professi onal use	General public	Via food
Inhalation	n.a.	yes	yes	n.a.	yes (acute)	yes (acute)	no
Dermal	n.a.	yes	yes	n.a.	yes	yes	no
Oral	n.a.	no	no	n.a.	no	yes (infants, toddlers)	yes

List of scenarios

	Summary table: scenarios						
Scenario number	Scenario	Primary or secondary exposure Description of scenario	Exposed group				
1.	Rural exposure scenario for profession al users	Primary exposure, direct Dilution of the product and application by knapsack or compression sprayers, High concentration rate rural hygiene scenario	Professional (trained and pest control operator PCO)				
2.	Rural exposure scenario for non- profession al users	Primary exposure, direct Dilution of the product and application by manually diluted hand-held pump or trigger sprayers, High concentration rate rural hygiene scenario	Non- professionals				
3.	Domestic exposure scenario for non- profession al users	Primary exposure, direct Dilution of the product and application by manually diluted hand-held pump or trigger sprayers, Domestic pest control scenario	Non- professionals				
4.	Rural exposure scenario – for profession al and non- profession als	Primary exposure, indirect Exposure via the dermal route - laundering work clothes High concentration rate rural hygiene scenario	Professional (trained and pest control operator PCO), Non- professionals				
5.	Domestic exposure scenario – for non- profession al users	Primary exposure, indirect Exposure via the dermal route - laundering work clothes Domestic pest contol and low concentration rate urban hygiene scenario	Non- professionals				
6.	Animal buildings/r ural exposure scenario	Secondary exposure, Exposure is acute and affects adults via inhalation and dermal route by accidental contamination from treated areas, High concentration rate rural pest control scenario	General public (adults)				
7.	Domestic exposure scenario	Secondary exposure, Exposure is chronic and affects adults, children, infants and toddlers via inhalation, dermal and oral route after crack and crevice treatment in a low pressure application scenario	General public (adults, children, infants and toddlers)				
8.	Rural exposure scenario – for profession al and non- profession	Primary exposure, indirect Exposure via the dermal route – cleaning of the spray equipment High concentration rate rural hygiene scenario	Professional (trained and pest control operator PCO), Non- professionals				

	Summary table: scenarios				
	als				
9.	Domestic exposure scenario – for non- profession al users	Primary exposure, indirect Exposure via the dermal route – cleaning of spraying equipment Domestic pest contol and low concentration rate urban hygiene scenario	Non- professionals		

Industrial exposure

No industrial exposure foreseen.

Professional exposure

Product application is by trained professionals and Pest Control Operators. For rural scenario, the in-use dilution of the product is 0.03% applying 50 mL per m² to give 15 mg a.s./m² and 0.06% applying 50 mL per m² to give 30 mg a.s./m², respectively. Dermal penetration is 1% for the concentrate of 15 g/L and 5% for the in-use dilutions. Application is by knapsack or compression sprayers. A daily use is anticipated, with a median duration of application of 120 minutes several times per day (TNsG Chapter 3, p. 110).

It is recommended that the professional trained operator wears gloves, coverall and RPE during application.

Predicted exposure is modeled based on a low-pressure insecticide application scenario including mixing and loading liquid compression sprayers and applying at 1 to 3 bar pressure as a coarse or medium spray, indoors and outdoors, overhead and downwards. (Reference: ECHA Biocides Human Health Exposure Methodology, p.204) (Spraying Model 1; TNsG Chapter 3, p.143) (Descriptor 1.3.1).

Model data for professional operators taken from Spraying Model 1; TNsG Chapter 3, p.143 – Indicative exposure values as proposed in the ECHA Biocides Human Health Exposure Methodology p. 204

Description of Model	Application Method	Indicative Exposures
Professional mixing and loading liquids and powders in compression sprayers or dusting applicators, and applying indoors and outdoors in overhead or downward direction. This model relates to insecticide application to various surfaces and articles in domestic and public (e.g. schools, nursing homes, restaurants, hospitals) areas. The model may also apply to other operations involving application via hand-held compression sprayers. Hand exposure is actual exposure inside gloves. Spraying model 1 TNsG part 2, p 143 Another model (model 10) describing exposures resulting from low pressure spraying of insecticides can be found in part 2 p 156	Hand-held low pressure (1-3 bar) spraying Medium/coarse spray Spot, crack and crevice and broadcast applications	Hands 10.7 mg/min Hands (potential) 181 mg/min Body 92 mg/min Inhalation 104 mg/m³

Scenario [1] RURAL EXPOSURE SCENARIO FOR PROFESSIONAL USERS

Description of Scenario [1]

The professional exposure assessment is based on the following assumptions:

	Parameters	Value
Tier 1	Operator body weight	60 kg
	Clothing penetration ¹	100%
	Dermal penetration of the a.s. ²	5%
	Inhalation rate ³	1.25 m ³ /h
	Inhalation uptake	100%
	Conc. of a.s. in treatment solution ⁴	0.06%
	Application duration ⁵	120 min
	Inhalation/dermal exposure during	Spraying Model 1; TNsG Chapter 3,
	mixing/loading/application	p.143; HSE survey EH74/3
Tier 2	Clothing penetration ⁶	20%
	Efficiency of potential RPE	90%

¹ no PPE, Tier 1 assessment, i.e. potential exposure

By default, pest control operators wear suitable protective clothing (coveralls), protective gloves and RPE during application of Fendona 1.5 SC. Nevertheless, a full assessment including Tier 1 was performed for completeness. The resulting expected total systemic doses, including the total potential exposure (no PPE, RPE used) as well as the application with protective clothing and gloves but no RPE or with the use of PPE and RPE are summarized. The chosen model is applicable for surface treatment by low pressure sprayers indoors and outdoors.

Please refer to Annex 3.2, Table 1 for calculations.

² overlay conservative as used for mixing, loading and application

³ 0.021 m³/min, HEEG Opinion 17, 2013

 $^{^4}$ 0.03% (domestic pest control, rural hygiene low concentration rate) and 0.06% (rural hygiene high concentration rate, worst case) (w/v, 100 and 200 mL Fendona 1.5 SC per 5 litre of spraying solution)

⁵ TNsG, worst-case maximum figure for low-pressure insecticide spraying, see Model 1, p. 143, where "less than two hours per day using pesticides" is denoted as "typical"

⁶ 80% protection factor for coated coverall for PT18 according to ECHA Biocides Human Health Exposure Methodology (p. 156)

Calculations for Scenario [1]

	Summary table: estimated exposure from professional uses					
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake	
			mg/kg	bw/day		
Scenario	1 / no PPE	0.0026	0.0164	-	0.0190	
[1]	2 / gloves, coverall	0.0026	0.0018	-	0.0044	
	2 / gloves, coverall, RPE	0.00027	0.0018	-	0.0021	

Non-professional exposure

Product application is by non-professionals (amateur users/consumers) who use the product infrequently. Non-professionals are not trained and may wear gloves, though this should not be assumed in the risk assessment. The concentrated product is 1.5% and the in-use dilutions are 0.03% (domestic pest control) and 0.06% (rural hygiene), applying 50 mL of the undiluted product per m^2 to give 15 mg to 30 mg a.s./ m^2 , respectively. Dermal penetration is 1% for the concentrate and 5% for the spray dilution.

Mixing and loading comprises dilution of the concentrate to the desired in-use dilution. Dermal exposure in the mixing/loading scenario has been assessed using the Mixing loading Model 2 for non-professionals (dermal exposure), TNsG Chapter 3, p.134, (Reference: ECHA Biocides Human Health Exposure Methodology, p.215;). For inhalation exposure the indicative exposure value based on EUROPOEM has been used, (TNsG Chapter 3, p.135).

Model data for mixing and loading by non-professional operators (consumers) taken from Mixing and Loading Model 2 and 3; TNsG Chapter 3, p.134 & p.135 - – Indicative dermal exposure values as proposed in the ECHA Biocides Human Health Exposure Methodology p. 215

Mixing/Loading		Indicative value in-use product
Potential dermal exposure (bare hands and forearms)	Worst case single event	12.8 mg/event
Exposure by inhalation	95 th % value	0.1 mg/kg a.s.

Application in animal houses/shelters is performed manually using either hand-held pump or trigger sprayers (worst case). The application scenario used in the risk assessment is based on hand-held trigger surface spraying (Reference: ECHA Biocides Human Health Exposure Methodology, p.220; Consumer spraying and dusting model 2 TNsG part 2, p 197).

Model data for application by non-professional operators (consumers) taken from Consumer spraying and dusting model 2 TNsG part 2, p 197- Indicative exposure values as proposed in the ECHA Biocides Human Health Exposure Methodology p. 220

Description of Exposure Model	Application Method	Indicative Exposures	Uncertainty
Non-professional surface spraying insecticide, indoors, on soft furnishings, carpets, skirting boards and shelves with dust applicators trigger sprays and aerosol cans. The models are derived from the following simulated volunteer studies: 1. Includes crack and crevice treatment for ants in a kitchen (skirting, shelves, horizontal laminate floors) using a fine powder (45% of particles less than 75 microm) and broadcast flea treatment (carpet) using coarse granules (95% of particles greater than 180 microm). 2. Crack and crevice insecticide treatment (skirting, shelves, horizontal/vertical laminate surfaces) using a ready for use liquid spray. 3. Broadcast treatment of small room (sofa, skirting dining chairs and carpet) using liquid spray. HSL 2001; ACP – SC 11000 - Consumer exposure to non-agricultural pesticide products	Hand-held trigger sprayer	Hand/forearm 36.1 mg/min Legs/feet/face 9.7 mg/min Inhalation 10.5 mg/m³	Uncertainty is moderate. 90 % C.I. for 75 th are 26- 50 (hands), 7.6-12.4 (legs), 9.0-12.2 (inhalation).
Consumer spraying and dusting model 2 TNsG part 2, p 197			

Fendona 1.5 SC PT18 Greece

Scenario [2] Rural exposure scenario for non-professional users

Description of Scenario [2]

The Consumer (non-professional) exposure assessment is based on the following assumptions:

	Parameters	Value
Tier 1	Operator body weight	60 kg
	Clothing penetration ¹	100%
	Dermal penetration of the a.s. ²	1% / 5%
	Inhalation rate ³	1.25 m ³ /h
	Inhalation uptake	100%
	Conc. of a.s. in concentrate	6% w/v
	Conc. of a.s. in treatment solution ⁴	0.06%
	Application duration ⁵	7 min / once a week
	Dermal Exposure during mixing/loading	Mixing and loading Model 2, non-
		professionals, TNsG p.134; HSL 2001
	Inhalation exposure during	Mixing and loading Model 3,
	mixing/loading	professionals, TNsG p.135; EUROPOEM
	Consumer exposure during application	Application via hand-held trigger
		spray (Consumer spraying and dusting
		model 2 TNsG part 2, p 197, hand-held
		trigger spray)
Tier 2	Clothing penetration ⁶	50% (for long sleeved shirts and
		trousers)

¹ no clothing (bare hands and forearms), Tier 1 assessment, i.e. potential exposure

One event in several weeks.

Please refer to Annex 3.2, Table 2 and 3 for calculations.

² 1% for the concentrate and 5% for the spray dilution

³ 0.021 m³/min, HEEG Opinion 17, 2013

⁴ 0.03% (domestic scenario and rural hygiene low concentration rate) and 0.06% (rural hygiene, worst case) (w/v, 100 and 200 mL Fendona 1.5 SC per 5 litre of spraying solution) ⁵ TNsG, p114, PT18, non-professionals performing the following process/operation: surface trigger spray

indoor; crack and crevice application

⁶ HEEG Opinion 9, 2010 and Recommendation no. 8 of the BPC Ad hoc Working Group on Human Exposure, 2015

<u>Scenario [3] DOMESTIC EXPOSURE SCENARIO FOR NON-PROFESSIONAL USERS</u> (CONSUMERS)

Description of Scenario [3]

The risk assessment for high concentration rate application at 30 mg a.s./m 2 (see scenario [2]) covers the situation at low concentration rate rural hygiene application and domestic pest control. For completeness human exposure (consumers) for low concentration rate application of 15 mg a.s./m 2 is calculated.

Calculations for Scenario [2, 3]

	Summary tab	le: systemic e	xposure from n	on-professional	uses
Exposure	Tier/PPE	Estimated	Estimated	Estimated	Estimated total
scenario		inhalation	dermal	oral uptake	uptake
		uptake	uptake		
			mg/	kg bw/day	
Scenario [2]					
Mixing/loading	1 / potential exposure	1 x 10 ⁻⁴	1.28 x 10 ⁻⁴	-	2.28 x 10 ⁻⁴
Application	1 / potential exposure	1.5 x 10 ⁻⁵	1.6 x 10 ⁻⁴	-	1.75 x 10 ⁻⁴
	2 / normal clothing	1.5 x 10 ⁻⁵	1.4 x 10 ⁻⁴	-	1.55 x 10 ⁻⁴
Total	1 / potential exposure	1.15 x 10 ⁻⁴	2.88 x 10 ⁻⁴	-	4.03 x 10 ⁻⁴
	2 / normal clothing	1.15 x 10 ⁻⁴	2.68 x 10 ⁻⁴	-	3.83 x 10 ⁻⁴
Scenario [3]		•		•	•
Mixing/loading	1 / potential exposure	5 x 10 ⁻⁵	6.4 x 10 ⁻⁵	-	1.14 x 10 ⁻⁴
Application	1 / potential exposure	0.75 x 10 ⁻⁵	0.8 x 10 ⁻⁴	-	0.87 x 10 ⁻⁴
	2 / normal	0.75 x 10 ⁻⁵	0.7 x 10 ⁻⁴	-	0.77 x 10 ⁻⁴
	clothing				
Total	1 / potential exposure	0.58 x 10 ⁻⁴	1.44 x 10 ⁻⁴	-	2 x 10 ⁻⁴
	2 / normal clothing	0.58 x 10 ⁻⁴	1.44 x 10 ⁻⁴	-	1.9 x 10 ⁻⁴

Indirect exposure

<u>Scenario [4] ANIMAL BUILDINGS/RURAL EXPOSURE SCENARIO for professionals and non-professionals</u>

Description of Scenario [4]

Adult professional and non-professional - cleaning work clothes at home

It is proposed that the people at risk are adults using a washing machine to launder contaminated coveralls at home. The worst-case exposure is via the dermal route – mainly to the hands – from handling the contaminated clothing prior to introduction into the washing machine.

The amount of product contaminating the coverall is considered to be equivalent to the potential dermal exposure estimated by the TNsG model (TNsG, Part 2, p.143). The indicative figure (75th percentile) is 11040 mg spray solution/day. With an a.s. concentration in the spray solution of 0.06% (max. concentration rate, i.e. worst case assumption), the potential contamination is 6.62 mg a.s./day. It is assumed that the coverall is washed weekly, after 5 days wear. Therefore, following 5 days wear, the total maximum residues accumulated on the coverall would be:

 $5 \text{ days} \times 6.62 \text{ mg a.s./day} = 33.12 \text{ mg a.s./week}$

It is assumed that the total outer surface area of a medium sized coverall is 22700 cm². Therefore, the accumulated residue expressed as mg a.s./cm² of coverall amounts to 1.5×10^{-3} mg a.s./cm².

For an adult, the total area of both hands is $820~cm^2$ (HEEG Opinion 17, 2013) with 100% hand contamination at 100% surface concentration (TNsG Part 3, p.43ff, wood preservatives). The transfer coefficient for contamination (dried fluid) from cotton, knitwear to wet hands is 30% (TNsG, Part 2, p.204). A dermal penetration rate of 5% is assumed for alpha-cypermethrin. The systemic dose for a 60~kg adult hence can be calculated as: (a.s. on coverall \times hand surface area \times hand contamination \times transfer coefficient \times

- $= (0.0015 \text{ mg a.s./cm}^2 \times 820 \text{ cm}^2 \times 0.3 \times 0.05) / 60 \text{ kg bw}$
- $= 3.07 \times 10^{-4} \text{ mg / kg bw/week}$

dermal absorption rate) / body weight

 $= 4.4 \times 10^{-5} \text{ mg/kg bw/d}$

Evnocod	Route and Exposure Levels [mg/kg bw/d]*
Exposed Population	Cleaning work clothes at home
Adults	4.4 x 10 ⁻⁵

^{*} based on a body weight for adults of 60 kg according to HEEG Opinion 17, 2013

Scenario [5] DOMESTIC EXPOSURE SCENARIO for non-professional users

Description of Scenario [5]

Adult non-professional - cleaning work clothes at home

It is proposed that the people at risk are adults using a washing machine to launder contaminated coveralls at home. The worst-case exposure is via the dermal route – mainly to the hands – from handling the contaminated clothing prior to introduction into the washing machine.

The amount of product contaminating the coverall is considered to be equivalent to the potential dermal exposure estimated by the TNsG model (TNsG Part 2, p.143). The indicative figure (75^{th} percentile) is 11040 mg spray solution/day. With an a.s. concentration in the spray solution of 0.03%, the potential contamination is 3.3 mg a.s./day. It is assumed that the coverall is washed weekly, after 5 days wear. Therefore, following 5 days wear, the total maximum residues accumulated on the coverall would be: $5 \text{ days} \times 3.3 \text{ mg}$ a.s./day = 16.56 mg a.s./week

It is assumed that the total outer surface area of a medium sized coverall is 22700 cm 2 . Therefore, the accumulated residue expressed as mg a.s./cm 2 of coverall amounts to 7.2 x 10^{-4} mg a.s./cm 2 .

For an adult, the total area of both hands is 820 cm² (HEEG Opinion 17, 2013) with 100% hand contamination at 100% surface concentration (TNsG Part 3, p.43ff, wood preservatives). The transfer coefficient for contamination (dried fluid) from cotton, knitwear to wet hands is 30% (TNsG Part 2, p.204). A dermal penetration rate of 5% is assumed for alpha-cypermethrin. The systemic dose for a 60 kg adult hence can be calculated as:

(a.s. on coverall \times hand surface area \times hand contamination \times transfer coefficient \times dermal absorption rate) / body weight

- = $(0.00072 \text{ mg a.s./cm}^2 \times 820 \text{ cm}^2 \times 0.3 \times 0.05) / 60 \text{ kg bw}$
- $= 1.5 \times 10^{-4} \text{ mg/kg bw/week}$
- $= 2.1 \times 10^{-5} \text{ mg/kg bw/d}$

Exposed Population	Route and Exposure Levels [mg/kg bw/d]*
	Cleaning work clothes at home
Adults	2.1 x 10 ⁻⁵ mg/kg bw/d

^{*} based on a body weight for adults of 60 kg according to HEEG Opinion 17, 2013

<u>Scenario [8] ANIMAL BUILDINGS/RURAL EXPOSURE SCENARIO for professionals and non-professionals</u>

Description of Scenario [8]

Adult professional and non-professional – cleaning of spraying equipment

Exposure can also occur *via* hands and body during cleaning of the spraying equipment. For the assessment and in the absence of a more relevant model, the Recommendation no. 4 of the BPC Ad hoc Working Group on Human Exposure "Cleaning of spray equipment in antifouling use (PT21)" has been applied. More specifically the surrogate values from BEAT model database have been used.

Exposure Description	
Hand	
indicative value (rate of deposition of product : μL in-use product/min)	35.87
task duration (default value = 20 min/day)	20
product on hands (µL /day)	717.4
Body	
indicative value (rate of deposition of product : µL in-use product/min)	19.28
task duration (default value = 20 min/day)	20
potential amount of product on rest of body (µL /day)	385.6
clothing penetration (default value = 100%)	100%
actual dermal deposit of product on rest of body (µL /day)	385.6
total <u>actual</u> dermal exposure to product (µL /day)	1103
Total dermal exposure to a.s. <i>via</i> hands and body (mg) [(in-use product contains 0.06%)]	0.00066
skin penetration (5%)#	0.05
Total systemic exposure to a.s. <i>via</i> dermal exposure (mg a.s./person/day)	0.000033
Total systemic exposure to a.s. for a 60 kg adult (mg a.s./kg bw/day)	5.5 X 10 ⁻⁷

Evposed	Route and Exposure Levels [mg/kg bw/d]
Exposed Population	Cleaning of spraying equipment
Adults	5.5 x 10 ⁻⁷ mg/kg bw/d

Scenario [9] DOMESTIC EXPOSURE SCENARIO for non-professional users

Description of Scenario [9]

Adult professional - cleaning of spraying equipment

Exposure can also occur *via* hands and body during cleaning of the spraying equipment. For the assessment and in the absence of a more relevant model, the Recommendation no. 4 of the BPC Ad hoc Working Group on Human Exposure "Cleaning of spray equipment in antifouling use (PT21)" has been applied. More specifically the surrogate values from BEAT model database have been used.

Exposure Description	
Hand	
indicative value (rate of deposition of product : µL in-use product/min)	35.87
task duration (default value = 20 min/day)	20
product on hands (µL /day)	717.4
Body	
indicative value (rate of deposition of product : µL in-use product/min)	19.28
task duration (default value = 20 min/day)	20
potential amount of product on rest of body (µL /day)	385.6
clothing penetration (default value = 100%)	100%
actual dermal deposit of product on rest of body (µL /day)	385.6
total <u>actual</u> dermal exposure to product (µL /day)	1103
Total dermal exposure to a.s. <i>via</i> hands and body (mg) [(in-use product contains 0.03%)]	0.00033
skin penetration (5%)#	0.05
Total systemic exposure to a.s. via dermal exposure (mg a.s./person/day)	0.000016
Total systemic exposure to a.s. for a 60 kg adult (mg a.s./kg bw/day)	2.6 X 10 ⁻⁷

Evnocod	Route and Exposure Levels [mg/kg bw/d]
Exposed Population	Cleaning of spraying equipment
Adults	2.6 x 10 ⁻⁷ mg/kg bw/d

Exposure of the general public

Secondary exposure

Scenario [6] ANIMAL BUILDINGS/RURAL EXPOSURE SCENARIO - ACUTE PHASE

Description of Scenario [6]

The rural pest control exposure scenario covers adults exposed to alpha-cypermethrin at 30 mg a.s./m² (worst case) after surface treatment in a low pressure application scenario.

A. Adults – inhalation route (volatilised residues indoors)

In a conservative approach it is assumed that the indoor air is saturated with alpha-cypermethrin vapour. The approach described in HEEG Opinion 13 has been followed: Exposure = $SVC (mg/m^3) \times ir (m^3/hr) / bw (kg)$

SVC = $0.41 \times mw \times vp (mg/m^3)$

The vapour pressure of alpha-cypermethrin at 25°C is 5.6×10^{-7} Pa (see active ingredient Biocide Doc. II-A, Chapter 1.3). and its molecular weight 416.3 g/mol.

The SVC for alpha-cypermethrin is thus $0.41 \times 416.3 \times 5.6 \times 10^{-7} = 9.56 \times 10^{-5} \text{ mg/m}^3$.

The body weight and inhalation rate (light exercise) for adults is 60 kg and 1.25 m³/h, respectively (HEEG Opinion 17, 2013).

The following systemic dose is calculated for an 8 h (worst case assumption for acute exposure scenario where exposure occurs in a single treated room, without ventilation and without product breakdown) exposure:

Overview of human exposure after acute exposure in the rural pest control scenario and corresponding estimates of inhalational exposure in bystanders applying Fendona 1.5 SC by low-pressure spraying.

Evposed	Route and Exposure Levels [mg/kg bw/d]*
Exposed Population	Inhalation (8 h)
Adults	1.6 × 10 ⁻⁵

 $^{^{}st}$ based on a body weight for adults of 60 kg according to HEEG Opinion 17, 2013

B. Adults – dermal exposure to residues on treated surfaces

Dermal exposure is expected to occur for bystanders accidentally via direct contact to deposits of the biocide on the surface of contact, i.e. after surface application.

It is assumed that in the surface application scenario secondary exposure occurs to adults working in the vicinity of treated surface, thereby accidentally touching a treated area with their bare hands. The following parameters have been considered: hand surface of $410~\rm cm^2$ for both palms (as given in HEEG opinion 17, 2013), 100% hand contamination at 100% surface concentration (TNsG Part 3, p.43ff, wood preservatives) and dislodgeable fraction of 5.3 g/m² (TNsG Part 2, p.261). The dermal absorption rate of alpha-cypermethrin at low concentrations was determined at 5%. Assuming that a concentration rate of 0.50 mL Fendona/m² (30 mg alpha-cypermethrin /m²; 0.06%) was used for treatment, the following systemic doses are resulting from dermal exposure (Please refer to Annex 3.2, Table 4 for details).

Overview of human exposure after acute exposure in the rural pest control scenario and corresponding estimates of dermal exposure in bystanders accidentally getting

Description of Scenario [6]

into contact with contaminated surfaces

Exposed	Route and Exposure Levels [mg/kg bw/d]*			
Population	Dermal			
Adults	1.09 x 10 ⁻⁴			

^{*} based on a body weight for adults of 60 kg and hand surfaces of both hands of 410 cm² adults according to HEEG Opinion 17, 2013

C. Combined acute secondary exposure in the high concentration rural exposure scenario

Overview of human exposure after acute exposure in the high concentration rate rural pest control scenario and corresponding estimates of relevant exposure in bystanders

following application of Fendona 1.5 SC by low-pressure spraying.

Exposed	Route and Expos	Total Exposure [mg/kg bw/d]		
Population	Inhalation (8 h)	Dermal	Oral	[mg/kg bw/d]
Adults*	1.6 × 10 ⁻⁵	1.09 x 10 ⁻⁴	Not applicable	1.25 × 10 ⁻⁴

^{*} based on a body weight for adults of 60 kg according to HEEG Opinion 17, 2013

Scenario [7] DOMESTIC EXPOSURE SCENARIO - CHRONIC PHASE

Description of Scenario [7]

The domestic pest control exposure scenario covers adults, children, infants and toddlers exposed to alpha-cypermethrin at 15 mg a.s./m² after crack and crevice treatment in a low pressure application scenario.

A. Adults, children, infants and toddlers – inhalation route (volatilised residues indoors)

According to HEEG opinion 13 (2013), inhalation exposure of volatilised biocide a.s., that is the amount of a.s. volatilizing from surfaces after application with the product, can be considered negligible if the following is true for a toddler (worst case compared to adults) based on an inhalation rate of 8 m³/24 h and a bw of 10 kg and using an AEL in mg/kg bw/d: $0.328 \times \text{mw} \times \text{vp}$ / AEL $_{\text{long-term}} \leq 1$

where mw denotes the molecular weight (416.3 g/mol) and vp the vapour pressure in Pa $(5.6 \times 10^{-7} \text{ Pa at } 25^{\circ}\text{C})$.

Considering an AEL_{Long-term} of 0.009 mg/kg bw/d, the assessment results in 0.328 x 416.3 g/mol x 5.6 x 10^{-7} / 0.009 mg/kg bw/d = 8.5 x 10^{-3} \leq 1 being true.

Therefore the inhalation risk for toddlers as well as for infant, children and adults is **negligible** in long-term exposure.

B. Adults, children, toddler and infants – dermal exposure to residues on treated surfaces after crack & crevice application

Dermal exposure is expected to occur for bystanders in the domestic area after cracks and crevices application which includes treatment areas such as wall voids, spaces between walls and cabinets or other small spaces that could be in the reach of children, toddler and infants. Adults may touch treated surface by accident, too. Therefore, exposure could occur in the crack and crevice model via direct contact to deposits of the biocide on the surface of contact after product application.

It is assumed that in the crack and crevice application scenario secondary exposure occurs to infants, toddlers and children crawling/playing or adults working around treated surfaces, thereby accidentally touching a treated area with their bare hands. Hand surfaces as given in HEEG opinion 17, 2013 with 100% hand contamination at 100% surface concentration (TNsG Part 3, p.43ff, wood preservatives) have been considered along with a dislodgeable fraction of 11.6 g/m² (Pest Control Consexpo Factsheet). The dermal absorption rate of alpha-cypermethrin at low concentrations was determined at 5.0%. Assuming that a concentration rate of 1.0 mL Fendona/m² (15 mg alpha-cypermethrin/m²; 0.03%) was used for treatment, the following systemic doses are resulting from dermal exposure, estimated for infants, toddlers, children and adults (please refer to Annex 3.2, Table 5 for details).

Overview of human exposure after exposure in the domestic pest control scenario and corresponding estimates of dermal exposure in bystanders applying Fendona 1.5 SC by low-pressure spraying.

Exposed Population	Route and Exposure Levels [mg/kg bw/d]* Dermal
Adults	1.2 x 10 ⁻⁴
Children	3.1 x 10 ⁻⁴

Description of Scenario [7]

Т	Γoddlers	4 x 10 ⁻⁴
I	Infants	4.2 x 10 ⁻⁴

^{*} based on a body weight for infants of 8 kg, toddlers of 10 kg, children of 23.9 kg and adults of 60 kg and hand surfaces of both hands of 196.8 cm^2 , 230.4 cm^2 , 427.8 cm^2 , 410 cm^2 for infants, toddlers, children, adults, respectively according to HEEG Opinion 17, 2013

C. Infants & Toddlers - oral exposure after hand-to-mouth transfer

Small children exhibit a great deal of hand-to-mouth (HTM) contact. Therefore, a part of the alpha-cypermethrin residues present on the hands will be dislodged by saliva and eventually ingested.

For hand-to-mouth exposure and as indicated in HEEG Opinion 7, hands form about 20% of the total uncovered skin and is assumed that 50% of the product ending up on the hands is taken orally. The parameters used in the calculation are described in detail below:

Exposure parameter	Value
Transfer coefficient, (Recommendation no. 12 of the	2000 cm ² /hr
BPC Ad hoc Working Group on Human Exposure)	
Contact time	1 h
Oral absorption	45%
Body weight, (HEEG Opinion 17)	8 kg (infant), 10 kg (toddler)

Based on these assumptions, oral exposure of infants via HTM transfer can be calculated as presented in Table 6 (Annex 3.2).

Overview of human exposure after acute exposure in the domestic pest control scenario and corresponding estimates of oral exposure in bystanders applying Fendona 1.5 SC by low-pressure spraying.

Exposed Population	Route and Exposure Levels [mg/kg bw/d]* Oral by ingestion
Toddlers	3.1 x 10 ⁻³
Infants	3.9 x 10 ⁻³

^{*} based on a body weight for infants of 8kg and toddlers of 10kg according to HEEG Opinion 17, 2013

D. Combined acute secondary exposure in the domestic pest control exposure scenario

Overview of human exposure after acute exposure in the domestic pest control scenario and corresponding estimates of relevant exposure in bystanders applying Fendona 1.5 SC by low-pressure spraying.

Function	Route and exposure levels [mg/kg bw/d]*			Tabal assessment
Exposed population	Inhalation	Dermal	Oral	Total exposure [mg/kg bw/d]

C	Description of Scenario [7]						
	Adults	negligible	1.2 x 10 ⁻⁴	Not applicable	1.2 x 10 ⁻⁴		
	Children	negligible	3.1 x 10 ⁻⁴	Not applicable	3.1 x 10 ⁻⁴		
	Toddlers	negligible	4 x 10 ⁻⁴	3.1 x 10 ⁻³	3.5 x 10 ⁻³		
	Infants	negligible	4.2 x 10 ⁻⁴	3.9 x 10 ⁻³	4.3 x 10 ⁻³		

^{*} based on a body weight for infants of 8 kg, toddlers of 10 kg, children of 23.9 kg and adults of 60 kg according to HEEG Opinion 17, 2013

Calculations for Scenario [4, 5, 6, 7, 8, 9]

	Summary table: systemic exposure from non-professional uses				
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake
			mg/k	g bw/day	
Scenario [4]	1 / potential exposure	n.a	4.4 x 10 ⁻⁵	n.a.	4.4 x 10 ⁻⁵
Scenario [5]	1 / potential exposure	n.s	2.1 x 10 ⁻⁵	n.a.	2.1 x 10 ⁻⁵
Scenario [6]	1 / potential exposure	1.6 × 10 ⁻⁵	1.09 x 10 ⁻⁴	n.a.	1.25 x 10 ⁻⁴
Scenario [7] Adults Children Toddlers Infants	1 / potential exposure	Negligible Negligible Negligible negligible	1.2 x 10 ⁻⁴ 3.1 x 10 ⁻⁴ 4 x 10 ⁻⁴ 4.2 x 10 ⁻⁴	n.a. n.a. 3.1 x 10 ⁻³ 3.9 x 10 ⁻³	1.2 x 10 ⁻⁴ 3.1 x 10 ⁻⁴ 3.5 x 10 ⁻³ 4.3 x 10 ⁻³
Scenario [8]	1 / potential exposure	n.a	5.5 x 10 ⁻⁷	n.a.	5.5 x 10 ⁻⁷
Scenario [9]	1 / potential exposure	n.a	2.6 x 10 ⁻⁷	n.a.	2.6 x 10 ⁻⁷

Combined exposure

For combined exposure the following senarios have been considered:

- A professional pest-control officer (rural areas) cleaning the spraying equipment and laudering his work clothes [Scenarios 1+4+8]
- A non-professional user (rural areas) cleaning the spraying equipment and laudering his work clothes [Scenarios 2+4+8]
- A non-professional user (domestic areas) cleaning the spraying equipment and laudering his work clothes [Scenarios 3 + 5 + 9]
- A non-professional user (rural areas) entering the animal house/shelter following appplication [Scenarios 2 + 6]
- A non-professional user (domestic areas) living in the treated house [Scenarios 3 + 7].

	Summary table: systemic combined exposure							
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake			
			mg/k	g bw/day				
Scenarios [1 + 4 + 8]	2 / gloves, coverall 1 / potential exposure/ potential exposure	0.0026	0.00184	-	0.0044			
Scenarios [2 + 4 + 8]	1 / potential exposure/ potential exposure	1.15 x 10 ⁻⁴	0.00033	-	0.00045			
Scenarios [3 + 5 + 9]	1 / potential exposure/ potential exposure	0.58 x 10 ⁻⁴	1.65 x 10 ⁻⁴	-	2.23 x 10 ⁻⁴			
Scenarios [2 + 6]	1 / potential exposure	1.31 x 10 ⁻⁴	3.97 x 10 ⁻⁴	-	5.28 x 10 ⁻⁴			
Scenarios [3 + 7]	1 / potential exposure	5.8 x 10 ⁻⁵	2.64 x 10 ⁻⁴	-	3.2 x 10 ⁻⁴			

Monitoring data

No further information on surveys or studies with the actual product or with a surrogate is submitted.

Dietary exposure

The b.p. Fendona 1.5 SC is used as insecticide (product type 18) in urban & domestic and rural environments by professionals and general public. The treatment of animal house surfaces with alpha-cypermethrin-containing insecticidal product may lead to residues in animal commodities (meat, milk, eggs).

The b.p. Fendona 1.5 SC may be used to treat any surface in animal housing facilities (including walls, floors, ceilings, window and door frames, pen enclosures etc.) as well as bedding and manure. Animals can be exposed <u>orally</u> (by licking of and chewing treated surfaces, consumption of dead insects, eating straw from the bedding or the floor), <u>dermally</u> (through contact with treated surfaces) and <u>via inhalation</u> (e.g. for volatile substances).

List of scenarios

The only relevant dietary exposure represents the transfer of alpha-cypermethrin into swine, bovine, poultry, milk and eggs due to exposure of ruminants, pigs and birds after surface disinfection of animal houses.

	Summary table of main representative dietary exposure scenarios							
Scenario Type of use Description of scenario		Subject of exposure						
		Transfer of alpha synormothrin into						
[9]	Animal	Transfer of alpha-cypermethrin into	swine, bovine, poultry, milk and					
	husbandry	swine, bovine, poultry, milk and eggs due to exposure of ruminants, pigs and	eggs					
		birds after surface disinfection of						
		animal houses.						

Information of non-biocidal use of the active substance

	Summary table of other (non-biocidal) uses					
	Sector of use	Intended use	Reference value(s)			
1.	Plant protection products	Insecticide	MRL: 0.05 – 2 mg/kg (products of plant and animal origin) ¹ ADI: 0.015 mg/kg bw/day ¹ ARfD: 0.04 mg/kg bw ¹ AOEL: 0.01 mg/kg bw/day ¹			
2.	Veterinary use	Insecticide	MRL for all ruminants: 20 µg/kg (muscle, liver, kidney, milk) ² 200 µg/kg (fat) ² MRL for chicken: 50 µg/kg (muscle, fat, liver, kidney, eggs) ³			

¹ EU Pesticide Database, alpha-cypermethrin (http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=activesubstance.detail&language=EN&selectedID=937)

(http://www.ema.europa.eu/ema/index.jsp?curl=pages/includes/document/document_detail.jsp?webContentId=WC500013075&mid=WC0b01ac058006488e)

Estimating Livestock Exposure to Active Substances used in Biocidal Products

Animal exposure calculations were conducted according to European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products.

² Cypermethrin (Extrapolation to all ruminants): Summary report (4) - Committee for Veterinary Medicinal Products, 2004

³ Cypermethrin: Summary report (2) - Committee for Veterinary Medicinal Products, 2001

⁽http://www.ema.europa.eu/ema/index.jsp?curl=pages/includes/document/document_detail.jsp?webContentId=WC500013073&mid=WC0b01ac058006488e)

Scenario [9]

Calculations for estimating livestock exposure

Exposure of ruminants

The treatment of animal house surfaces with alpha-cypermethrin-containing insecticidal product will be done with an application rate of 15 or 30 mg a.s./m². The calculation of the animal biocide intake was conducted with 30 mg a.s./m² as a worst case assumption since it will cover the 15 mg a.s./m² use.

The animal exposure calculations were conducted according to European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

Oral exposure:

Grown ruminants generally prefer the salt licks provided to them, while calves frequently lick other surfaces and objects (e.g. walls). Feed remaining in troughs may unintentionally be contaminated if it is present in the treated area during application of a biocide. It is assumed as a worst-case that troughs are not covered during biocidal treatment and that all residues contained on the bottom and sides of the trough migrate into the next feed batch that is given after biocidal treatment. It follows that all of the residue contained in the trough is taken up by the animal.

<u>Dermal exposure</u>:

Large slaughter animals, e.g. cattle, frequently rub against surfaces such as walls and pen enclosures. These surfaces are often treated with biocides, providing a source of exposure. It is assumed that all a.s. (except for the vapourised fraction) has settled on surfaces and that animals are not exposed to the spray during application. The exposure estimate covers dermal uptake as well as oral intake from grooming.

Inhalation exposure:

It is assumed that the animal is exposed to air containing the a.s. at its saturated vapour concentration (SVC). This represents a worst-case as the a.s. cannot achieve a higher concentration in the air.

	Parameters		Value		
			Calf	Beef cattle	Dairy cattle
Tier 1	Application rate ¹	mg a.s./m ²	30	30	30
	Area treated (walls) ²	m²	330	1000	1670
	Area treated (floor) ²	m²	160	370	1170
	Number of animals per stable ²		80	125	100
	Body weight ²	kg	200	500	650
	Tongue surface area ²	m²	0.008	n.a.	n.a.
	Licks per day ²		10	n.a.	n.a.
	Emission factor of spraying (floor) ²		0.11	0.11	0.11
	Emission factor of spraying (wall) ²		0.85	0.85	0.85
	Body surface area in contact with treated surface ²	m²	0.87	1.44	1.68

Exposu	Exposure of ruminants						
	Exposed feed surface area ²	m²	0.5	0.7	2.9		
	Alveolar ventilation rate ²	m³/day	25	50	62		
	Vapour pressure 20°C	Pa	2.50x10 ⁻⁷	2.50x10 ⁻⁷	2.50x10 ⁻⁷		
	Vapour pressure 25°C4	PA	5.60x10 ⁻⁷	5.60x10 ⁻⁷	5.60x10 ⁻⁷		
	Molecular weight ³	g/mol	416.3	416.3	416.3		
	Temperature 20°C	K	293	293	293		
	Temperature 25°C	K	298	298	298		
	Gas const.	J/K mol	8.31451	8.31451	8.31451		

Exposure of ruminants

Realistic worst-case estimate:

Oral exposure through licking of surface [mg/animal/day]:

Application rate \times Emmision factor for spraying (wall) \times Tongue surface area \times Licks per day

Oral exposure through uptake of contaminated feed [mg/animal/day]:
Application rate × Emission factor for spraying (floor) × Exposed feed surface

Dermal exposure through rubbing against surfaces [mg/animal/day]:

Application rate \times Emmision factor for spraying (wall) \times Body surface area in contact with surface

Inhalation exposure:

SVC

- = (vapour pressure × molecular weight) / (gas constant × temperature in degrees Kelvin)
- $= 4.27 \times 10^{-5}$ mg a.s./m³ at 20°C and
- = 9.41×10^{-5} mg a.s./m³ at 25°C (used for calculation of realistic wirst case estimate)

Inhalation exposure $[mg/animal/day] = SVC \times Alveolar ventilation rate$

	Calf	Beef cattle	Dairy cattle
	[mg/animal/day]	[mg/animal/day]	[mg/animal/day]
Oral exposure through	2.04	n.a. (grown ruminants g	enerally prefer the salt
licking of surface		licks provided to them)	
Oral exposure through	1.65	2.31	9.57
uptake of			
contaminated feed			
Dermal exposure	22.19	36.72	42.84
through rubbing			
against surfaces			
Inhalation exposure	0.0024	0.0047	0.0058
Sum	25.88	39.03	52.41
(Realistic worst			
case estimate)			

¹ worst case assumption

² European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

³ Assessment report, RMS BE

⁴ a value 3.8 x 10-7 was used based on the renewal assessment report of alpha-cypermethrin as a PPP. the value of 5.60x10-7 cited in this dossier for 25°C appears more conservative, thus the inhalation exposure of animals was performed with the more conservative value as to address this difference.

Exposure of pigs

The treatment of animal house surfaces with alpha-cypermethrin-containing insecticidal product will be done with an application rate of 15 or 30 mg a.s./ m^2 . The calculation of the animal biocide intake was conducted with 30 mg a.s./ m^2 as a worst case assumption since it will cover the 15 mg a.s./ m^2 use.

The animal exposure calculations were conducted according to European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

Oral exposure:

Pigs do not usually lick walls, but prefer metal objects. Feed remaining in troughs may unintentionally be contaminated if it is present in the treated area during application of a biocide. It is assumed as a worst-case that troughs are not covered during biocidal treatment and that all residues contained on the bottom and sides of the trough migrate into the next feed batch that is given after biocidal treatment. It follows that all of the residue contained in the trough is taken up by the animal.

<u>Dermal exposure</u>:

Large slaughter animals, e.g. pigs, frequently rub against surfaces such as walls and pen enclosures. These surfaces are often treated with biocides, providing a source of exposure. It is assumed that all a.s. (except for the vapourised fraction) has settled on surfaces and that animals are not exposed to the spray during application. The exposure estimate covers dermal uptake as well as oral intake from grooming.

Inhalation exposure:

It is assumed that the animal is exposed to air containing the a.s. at its saturated vapour concentration (SVC). This represents a worst-case as the a.s. cannot achieve a higher concentration in the air.

	Parameters		Value		
			Fattening	Breeding	Breeding
			pig	pig	pig
				(individual	(group
				housing)	housing)
Tier 1	Application rate ¹	mg a.s./m ²	30	30	30
	Area treated (walls and roof) ²	m²	970	910	1160
	Number of animals per stable ²		400	132	132
	Body weight ²	kg	100	260	260
	Emission factor of spraying (floor) ²		0.11	0.11	0.11
	Emission factor of spraying (wall) ²		0.85	0.85	0.85
	Body surface area in contact with treated surface ²	m²	0.45	0.84	0.84
	Exposed feed surface area (direct treatment of toughts) ²	m²	1.2	2.4	2.8
	Alveolar ventilation rate ²	m³/day	14	30	30
	Vapour pressure 20°C	Pa	2.50x10 ⁻⁷	2.50x10 ⁻⁷	2.50x10 ⁻⁷
	Vapour pressure 25°C	Pa	5.60x10 ⁻⁷	5.60x10 ⁻⁷	5.60x10 ⁻⁷

Exposure of pigs						
	Molecular weight ³	g/mol	416.3	416.3	416.3	
	Temperature 20°C	K	293	293	293	
	Temperature 25°C	K	298	298	298	
	Gas const.	J/K mol	8.31451	8.31451	8.31451	

¹ worst case assumption

Realistic worst-case estimate:

Oral exposure through uptake of contaminated feed [mg/animal/day]:
Application rate × Emission factor for spraying (floor) × Exposed feed surface area

Dermal exposure through rubbing against surfaces [mg/animal/day]:

Application rate \times Emmision factor for spraying (wall) \times Body surface area in contact with surface

Inhalation exposure:

SVC

- = (vapour pressure \times molecular weight) / (gas constant \times temperature in degrees Kelvin)
- = $4.27 \times 10-5$ mg a.s./m³ at 20°C and
- = $9.41 \times 10-5$ mg a.s./m³ at 25°C (used for calculation of realistic worst case estimate)

Inhalation exposure $[mg/animal/day] = SVC \times Alveolar ventilation rate$

	Fattening pig [mg/animal/day]	Breeding pig (individual housing) [mg/animal/day]	Breeding pig (group housing) [mg/animal/day]
Oral exposure through uptake of contaminated feed	3.96	7.92	9.24
Dermal exposure through rubbing against surfaces	11.48	21.42	21.42
Inhalation exposure	0.0013	0.0028	0.0028
Sum (Realistic worst case estimate)	15.44	29.34	30.66

² European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

³ Assessment report, RMS BE

Exposure of birds

The treatment of animal house surfaces with alpha-cypermethrin-containing insecticidal product will be done with an application rate of 15 or 30 mg a.s./m². The calculation of the animal biocide intake was conducted with 30 mg a.s./m² as a worst case assumption since it will cover the 15 mg a.s./m² use.

The animal exposure calculations were conducted according to European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

Oral exposure:

Poultry do not engage in licking surfaces. The b.p. is used in animal housing to control flies and other insects. Consumption of insects killed by the biocide provides a source of biocidal exposure. Poultry seek out dead insects intentionally. For an exposure calculation, the amount of b.p. consumed by an insect in 24 hours is multiplied by the number of dead insects consumed by livestock. Feeding practices for poultry differ from those for cattle and pigs. Depending on whether poultry is held in battery cages or allowed to roam across the floor, feed is provided to them on conveyor belts or gutters (cages) or in dispenser bowls (ground). Poultry kept free range with access to the outside feed directly from the ground or from dispenser bowls. Dispenser bowls are equipped with a cylinder mounted on the bowl from where stored feed slides into the bowl as it is being emptied. Providing feed in dispenser bowls, on conveyor belts or in gutters allows poultry to feed throughout the day and some portion of the daily feed and water rations is always exposed to the environment, therefore allowing contamination with biocides.

Dermal exposure:

Small animals such as poultry do not engage in rubbing against surfaces. But dermal exposure can occur from spray hitting poultry during treatment. The exposure estimate includes dermal uptake as well as oral intake from grooming.

Inhalation exposure:

It is assumed that the animal is exposed to air containing the a.s. at its saturated vapour concentration (SVC). This represents a worst-case as the a.s. cannot achieve a higher concentration in the air.

	Parameters	Values for broiler chickens			
			Broiler Chickens	Parent Broiler Chicken	Broiler chickens, rearing
			Free range, litter floor	Free range, grating floor	Free range, grating floor
Tier 1	Application rate ¹	mg a.s./m ²	30	30	30
	Area treated (walls and roof) ²	m²	1600	600	750
	Number of animals per stable ²		20000	7000	9000
	Body weight ²	kg	1.7	1.7	1.7
	b.p. consumption by flies	mg b.p./fly/day	3.5	3.5	3.5
	# fly consumption	/day	10	10	10

Exposure of birds				
Emission factor of spraying (floor) ²		0.11	0.11	0.11
Body surface area in contact with treated surface ²	m²	0.015	0.015	0.015
Exposed feed surface area ²	m²	only applied battery	es for laying l	nen in
Alveolar ventilation rate ²	m³/day	0.2	0.2	0.2
Concentration a.s. in product	g/L	0.6	0.6	0.6
Coverage of floo by hens	% (factor)	0.5	0.5	0.5
Vapour pressure 20°C	Pa	2.50x10 ⁻⁷	2.50x10 ⁻⁷	2.50x10 ⁻⁷
Vapour pressure 25°C	Pa	5.60x10 ⁻⁷	5.60x10 ⁻⁷	5.60x10 ⁻⁷
Molecular weight ³	g/mol	416.3	416.3	416.3
Temperature 20°C	K	293	293	293
Temperature 25°C	K	298	298	298
Gas const.	J/K mol	8.31451	8.31451	8.31451

	Parameters		Values for laying hens			
			Battery	Battery	Free	Free
			without	with	range,	range,
			trough	trough	litter floor	grating
						floor
Tier 1	Application rate ¹	mg a.s./m ²	30	30	30	30
	Area treated (walls and roof) ²	m²	1100	1100	2030	1822
	Number of animals per stable ²		21000	21000	10000	20000
	Body weight ²	kg	1.9	1.9	1.9	1.9
	b.p. consumption by flies	mg b.p./fly/day	3.5	3.5	3.5	3.5
	# fly consumption	/day	10	10	10	10
	Emission factor of spraying (floor) ²		0.11	0.11	0.11	0.11
	Body surface area in contact with treated surface ²	m²	0.015	0.015	0.015	0.015
	Exposed feed surface area ²	m²	0	0.01	only applies for laying hen in battery	
	Alveolar ventilation rate ²	m³/day	0.2	0.2	0.2	0.2
	Concentration a.s. in product	g/L	0.6	0.6	0.6	0.6
	Coverage of floor by hens	% (factor)			0.5	0.5
	Vapour pressure 20°C	Pa	2.50x10 ⁻⁷	2.50x10 ⁻⁷	2.50x10 ⁻⁷	2.50x10 ⁻⁷
	Vapour pressure 25°C	Pa	5.60x10 ⁻⁷	5.60x10 ⁻⁷	5.60x10 ⁻⁷	5.60x10 ⁻⁷
	Molecular weight ³	g/mol	416.3	416.3	416.3	416.3
	Temperature 20°C	K	293	293	293	293
	Temperature 25°C	K	298	298	298	298

Ī	Parameters		Values for laying hens			
ĺ	Gas const.	J/K mol	8.31451	8.31451	8.31451	8.31451

Realistic worst-case estimate:

Oral exposure through ingestion of flies [mg/animal/day]: Fly consumption \times a.s. consumption of flies (0.0021 mg a.s./fly/day)

Oral exposure through uptake of contaminated feed [mg/animal/day]: Application rate \times Emission factor for spraying (floor) \times Exposed feed area

Dermal exposure through spray treatment:

% of spray hitting hens

= fraction emitted to floor during surface treatment (0.11) \times 50% (assuming that 50% of the floor is covered by hens)

= 5.5%

Dermal exposure [mg/animal/day]:

Application rate × treated area × % of spray hitting hens / Number of animals

Inhalation exposure:

SVC

- = (vapour pressure × molecular weight) / (gas constant × temperature in degrees Kelvin)
- $= 4.27 \times 10-5 \text{ mg a.s./m}^3 \text{ at } 20^{\circ}\text{C} \text{ and}$
- = $9.41 \times 10-5$ mg a.s./m³ at 25°C (used for calculation of realistic wirst case estimate)

Inhalation exposure [mg/animal/day]: SVC × Alveolar ventilation rate

¹ worst case assumption

² European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (CA-Dec10-Doc.6.2.b).

³ Assessment report, RMS BE

	Broiler Chickens [mg/animal/da y]	Parent Broiler chickens [mg/animal/da y]	Broiler chickens, rearing [mg/animal/da y]	
	Free range, litter floor	Free range, grating floor	Free range, grating floor	
Oral exposure (fly consumption	0.0210	0.0210	0.0210	
Oral exposure (feed)	0.0	0.0	0.0	
Dermal exposure	0.132	0.141	0.138	
Inhalation exposure	0.00002	0.00002	0.00002	
Sum (Realistic worst case estimate)	0.153	0.162	0.159	
	Laying hens [mg	/animal/day]		
	Battery without trough	Battery with trough	Free range, litter floors	Free range, grating floor
Oral exposure (fly consumption	0.0210	0.0210	0.0210	0.0210
Oral exposure (feed)	0.0	0.033	0.0	0.0
Dermal exposure	0.173 0.0864	0.173 0.0864	0.335	0.150
Inhalation exposure	0.00002	0.00002	0.00002	0.00002
Sum (Realistic worst case estimate)	0.194 0.107	0.227 0.14	0.356	0.171

Summary: Animal biocide intake calculation from all exposure routes

Ruminants

	Biocide Intake [mg/animal/day]					
	Calf	Beef cattle	Dairy cattle			
Realistic worst case	25.88	39.03	52.42			
estimate						

Pigs

	Biocide Intake [mg/animal/day]					
	Fattening pig	Breeding pig	Breeding pig (group			
		(individual housing)	housing)			
Realistic worst case estimate	15.44	29.34	30.66			

Poultry

- outry							
	Biocide	Biocide Intake [mg/animal/day]					
	Broiler Chickens	Broiler Chickens Parent Broiler Broiler chickens,					
		chickens	rearing				
	Free range,	Free range,	Free range,				
	litter floor	grating floor	grating floor				
Realistic worst	0.153	0.162	0.159				
case estimate							
	Laying hens						
	Battery without	Battery with	Free range,	Free range,			
	trough	trough	litter floors	grating floor			
Realistic worst	0.194	0.227	0.356	0.171			
case estimate	0.107	0.14					

Conclusion

Please refer to Section "Risk for consumers via residues in food"

<u>Estimating transfer of biocidal active substances into foods as a result of professional and/or industrial application(s)</u>

The only relevant exposure represents the transfer of alpha-cypermethrin into swine, bovine, poultry, milk and eggs due to exposure of ruminants, pigs and birds after surface disinfection of animal houses. Please refer to Section "Estimating Livestock Exposure to Active Substances used in Biocidal Products".

<u>Estimating transfer of biocidal active substances into foods as a result of non-professional use</u>

The only relevant exposure represents the transfer of alpha-cypermethrin into swine, bovine, poultry, milk and eggs due to exposure of ruminants, pigs and birds after surface disinfection of animal houses. Please refer to Section "Estimating Livestock Exposure to Active Substances used in Biocidal Products".

Exposure associated with production, formulation and disposal of the biocidal product

Fendona 1.5 SC (BAS 310 22 I) is manufactured by converting alpha-cypermethrin TC to a slurry with part of the co-formulants and milling in a bead mill to achieve the appropriate particle size. The remaining co-formulants are added thereafter. The resulting technical concentrate is homogenized subsequently with the additional co-formulants required by the BAS 310 22 I formulation. Quality control examines every batch of the product for essential parameter like a.s. content, density, particle size and wet sieving residue. This guarantees the constant quality of the end-use product Fendona 1.5 SC (BAS 310 22 I) according to its specification.

The potential exposure of industrial workers during the production and formulation of the b.p. should be addressed under other EU legislation (e.g. REACh) and not repeated under Regulation (EU) 528/2012 (BPR). The Biocides Technical Meeting (TMI06) agreed that a risk assessment for production and formulation of the a.s. was not required, unless the a.s. was totally new to the EU market and manufactured in the EU. This is not the case for alphacypermethrin which is an existing biocidal a.s. within the EU.

Furthermore, formulation of the b.p. is not considered to give rise to a health concern as industrial users are supposed to respect working hygiene.

Summary of exposure assessment

Scenarios and values to be used in risk assessment						
Scenario	Exposed group	Tier/PPE	Estimated total			
number			uptake			
1.	Professional (trained and pest	1 / no PPE	0.0190			
	control operator PCO)	2 / gloves, coverall	0.0044			
		2 / gloves, coverall, RPE	0.0021			
2.	Non-professionals	1 / potential exposure	4.03 10-4			
		2 / normal clothing	3.83 10-4			
3.	Non-professionals	1 / potential exposure	2 10-4			
		2 / normal clothing	1.9 10-4			
4.	Professional (trained and pest control operator PCO) & Non-professionals	1 / potential exposure	4.4 10 ⁻⁵			
5.	Non-professionals	1 / potential exposure	2.1 10 ⁻⁵			
6.	General public (adults)	1 / potential exposure	1.25 10-4			
1 + 4 + 8.	Professional (trained and pest control operator PCO)	2 / gloves, coverall + 1 / potential exposure	0.0044			
2 + 4 + 8.	Non-professionals	1 / potential exposure	0.00045			
3 + 5 + 9.	Non-professionals	1 / potential exposure	0.000223			
2 + 6.	Non-professionals	1 / potential exposure	0.000528			
3 + 7.	Non-professionals	1 / potential exposure	0.00032			
7.	General public Adults Children Toddlers Infants	1 / potential exposure	1.2 10 ⁻⁴ 3.1 10 ⁻⁴ 3.5 10 ⁻³ 4.3 10 ⁻³			

2.2.6.3 Risk characterisation for human health

Reference values to be used in Risk Characterisation

Reference Dose		Value	Unit	Remarks
Short-term	NOAEL _{short-term}	4.0	mg/kg bw/d	Acute neurotoxicity study
	NOAEL _{short-term} , systemic	1.8	mg/kg bw/d	Applying a factor of 0.45 for gastric absorption
	AEL _{short-term} , systemic	0.018	mg/kg bw/d	Applying an assessment factor of 100
Medium-term	NOAEL _{90-day oral dog}	3.5	mg/kg bw/d	Short-term toxicity study
	NOAEL _{medium-term} ,	1.575	mg/kg bw/d	Applying a factor of 0.45 for gastric absorption
	AEL _{medium-term} , systemic	0.016	mg/kg bw/d	Applying an assessment factor of 100
Long-term	NOAEL _{1-year oral dog}	2.0	mg/kg bw/d	Chronic toxicity study
	NOAEL _{long-term} , systemic	0.9	mg/kg bw/d	Applying a factor of 0.45 for gastric absorption
	AEL _{long-term} , systemic	0.009	mg/kg bw/d	Applying an assessment factor of 100

In the CAR of alpha-cypermethrin, the exposure levels for the professional users are compared with the medium-term AEL (occupational). However, for the current risk assessment and for professionals, [Pest-control-officers (PCO)], it is considered more relevant to use the long-term AEL value i.e. 0.009 mg/kg b.w./d.

The EU toxicological endpoints for alpha-cypermethrin are:

R	Reference values		Source
Α	DI	0.015 mg/kg bw/day	Commission Directive 2004/58/EC
Α	RfD	0.04 mg/kg bw	Commission Directive 2004/58/EC

Maximum residue limits or equivalent

Animal metabolism:

In the framework of registering alpha-cypermethrin under Council Directive 91/414/EEC metabolism studies were conducted in laying hen and in lactating cow.

Residue definition:

Alpha-cypermethrin (parent) - for risk assessment and MRL setting

MRLs or other relevant reference values	Reference	Relevant commodities	Value [mg/kg]
MRL	EU – Maximum	Swine and Bovine:	
	Residue Levels (Reg.	Muscle	2
	(EC) No 396/2005)	Fat tissue	2
		Liver	0.2
	Legislation:	Kidney	0.2
	Cypermethrin MRLs	Edible offals	0.2
	(Reg. (EU) No	Poultry:	
	626/2017)	Muscle	0.1
		Fat tissue	0.1
		Liver	0.05*
		Kidney	0.05*
		Edible offals	0.05*
		Milk:	
		Cattle	0.05
		Bird eggs:	
		Chicken	0.05*

^{*} Indicates lower limit of analytical determination

Specific reference value for groundwater

No specific reference value for groundwater was established. Thus, the European standard value of 0.1 μ g/L for the maximum admissible concentration of pesticides in drinking water (Council Directive 98/83/EC) does apply.

Risk for industrial users

Not relevant

Risk for professional users

Systemic effects

Scenari o	Tier	Systemic NOAEL [mg/kg bw/d]	AEL [mg/kg bw/d]	Estimated uptake [mg/kg bw/d]	Estimated uptake/ AEL (%)	Acceptable (yes/no)
Scenario	[1]					
Professi	1 (no PPE)	0.9	0.009	0.0190	211	No
onal long-	2 (gloves, coverall)	0.9	0.009	0.0044	49	Yes
term	2 (gloves, coverall, RPE)	0.9	0.009	0.0021	23	Yes
Scenario	s [1 + 4 + 8]					
Professi onal long- term	2 (gloves, coverall) / 1 potential/ 1 potential	0.9	0.009	0.0044	49	Yes

Local effects

There is no need to consider local effects separately.

Substance of Concern (SoC)

Fendona 1.5 SC contains 1,2-Propylene Glycol at levels of 13.98%. An IOEL of 10 mg/m³ for 1,2-Propylene Glycol is available in the GESTIS International Limit Values (http://limitvalue.ifa.dguv.de/ and as such, it should be considered as a SoC.

According to the Biocides Guidance on Human Health Risk Assessment (Parts B and C), Feb.2017_v.4, For SoCs for which Community workplace exposure limits (IOELVs –Indicative Occupational Exposure Limit Values) have been set, a quantitative inhalation risk assessment for the professional operator against the IOELV should always be conducted. Based on the above, a quantitative inhalation risk assessment for the professional user should be performed.

Considering the indicative inhalation exposure value of 104 mg/m³ (professional exposure; Spraying Model 1; TNsG Chapter 3, p. 143, HSE survey HE74/3) and the concentration of 1,2-Propylene glycol in the spraying dilution i.e. 0.6% for Scenario 1, the aerial concentration of 1,2-Propylene glycol is calculated to be 0.6 mg/m³. This value corresponds to 6% of the IOELV of 10 mg/m³. Therefore, an acceptable risk is identified at Tier 1 level without the use of any RPE for both scenarios.

Conclusion

For the professional user a safe use could be shown with gloves and coverall (but without RPE) when applying Fendona 1.5 SC at 30 and/or 15 mg a.s./ m^2 on rural and urban/domestic areas.

In addition, no risk has been identified following combined exposure for a professional user applying the product, cleaning the spraying equipment and laundering his workwear.

No risk has been identified for the professional user due to the presence of 1,2-Propylene Glycol in the product.

Risk for non-professional users

Systemic effects

Scenari o	Tier	Systemic NOAEL [mg/kg bw/d]	AEL [mg/kg bw/d]	Estimated uptake [mg/kg bw/d]	Estimated uptake/ AEL (%)	Acceptable (yes/no)
Scenario	[2]					
Non- professi	1 (potential expsoure)	1.8	0.018	4.03 x 10 ⁻⁴	2.2	Yes
onal acute	2 (normal clothing)	1.8	0.018	3.83 x 10 ⁻⁴	2.1	Yes
Non- professi	1 (potential expsure)	1.575	0.016	4.03 x 10 ⁻⁴	2.5	Yes
onal medium -term	2 (normal clothing)	1.575	0.016	3.83 x 10 ⁻⁴	2.4	Yes
Scenario	[3]			l		1
Non- professi	1 (potential exposure)	1.8	0.018	2 x 10 ⁻⁴	1.1	Yes
onal acute	2 (normal clothing)	1.8	0.018	1.9 x 10 ⁻⁴	1.05	Yes
Non- professi	1 (potential exposure)	1.575	0.016	2 x 10 ⁻⁴	1.25	Yes
onal medium -term	2 (normal clothing)	1.575	0.016	1.9 x 10 ⁻⁴	1.2	Yes
	s [2 + 4 + 8]	I				
Non- professi onal medium -term	1 (potential exposure)	1.575	0.016	0.00045	2.8	Yes
Scenario	s [3 + 5 + 9]					
Non- professi onal medium -term	1 (potential exposure)	1.575	0.016	0.000223	1.4	Yes
Scenario	s [2 + 6]		1		1	1
Non- professi onal acute	1 (potential expsure)	1.8	0.018	0.000528	2.9	Yes
Scenario	s [3 + 7]					
Non- professi onal	1 (potential exposure)	1.575	0.016	0.00032	2	Yes

Greece	Fendona 1.5 SC	PT18

medium			
-term			

Local effects

There is no need to consider local effects separately.

Conclusion

For the non-professional user (consumer) a safe use could be shown without the use of PPE/RPE when applying Fendona 1.5 SC on rural areas. In addition, no risk has been identified for a non-proffesional user applying the product, cleaning the spraying equipment and laundering afterwards his workwear or entering the treated area. Finally, a safe use was demonstrated for a non-professional user applying the product and living in the treated house.

Risk for the general public

Secondary risk assessment

Systemic effects

Scenari o	Tier	Systemic NOAEL [mg/kg bw/d]	AEL [mg/kg bw/d]	Estimated uptake [mg/kg bw/d]	Estimated uptake/ AEL (%)	Acceptab le (yes/no)
Scenario [6] General public adults acute	1 (potential exposure)	1.8	0.018	1.25 × 10 ⁻⁴	0.7	Yes
Scenario [7] Adults Children Toddlers Infants long- term	1 (potential exposure)	0.9	0.009	1.2 x 10 ⁻⁴ 3.1 x 10 ⁻⁴ 3.5 x 10 ⁻³ 4.3 x 10 ⁻³	1.3 3.4 39 48	Yes Yes Yes Yes

Local effects

There is no need to consider local effects separately.

Conclusion

Secondary exposure of the general public, to alpha-cypermethrin in Fendona 1.5 SC does not pose an unacceptable health risk. The AEL is neither reached nor exceeded by the estimated exposure.

Risk for consumers via residues in food

Comparison of animal feeding study levels with calculated biocide intake

Animal	Housing type	Calculated Biocide Intake [mg/animal /day]	Indicated feeding study level** [mg/animal /day]
Calf		25.9	77.0
Beef Cattle		39.0	77.0
Dairy cattle		52.4	77.0
Fattening pig		15.4	35.4
Breeding pig	individual housing	29.3	92.0
Breeding pig	group housing	30.7	92.0
Broiler chickens	free range, litter floor	0.15	0.68
Parent broiler chickens	free range, grating floor	0.16	0.68
Broiler chickens, rearing	free range, grating floor	0.16	0.68
Laying hen	battery without trough	0.11	0.68
Laying hen	battery with trough	0.14	0.68
Laying hen	free range, litter floor	0.36	0.68
Laying hen	free range, grating floor)	0.17	0.68

^{*} please refer to Section "Estimating Livestock Exposure to Active Substance used in Biocidal Products" (Chapter 1.2.6.2)

All biocide exposure calculations for **ruminants** are below the lowest feeding level and are therefore covered by the risk assessment conducted using the maximum residues derived from the cow feeding study at lowest feeding level as input parameters.

All biocide exposure calculations for **pigs** are below the medium feeding level and are therefore covered by the risk assessment conducted using the maximum residues derived from the cow feeding study at medium feeding level as input parameters.

All biocide exposure calculations for **poultry** resulted in values below the lowest feeding level and are therefore covered by the risk assessment conducted using the maximum residues derived from the hen feeding study at lowest feeding level as input parameters.

Based on the results of the feeding studies at the indicated levels (see table above) maximum residues data, shown in the table below (column 2), were derived. In column 3 approved MRLs of alpha-cypermethrin are shown (Cypermethrin MRLs (Reg. (EU) No 626/2017)).

^{**} please refer to feeding studies in Section "Other" (Chapter 1.2.6.1)

Column 1	Column 2	Column 3
Groups and examples of individual products to which the MRLs apply	Maximum residues derived from feeding study at indicated level [mg/kg]	Cypermethrin MRLs (5020/20) [mg/kg]
Swine		
Muscle	0.05^{1}	2
Fat tissue	0.16	2
Liver	0.05^{1}	0.2
Kidney	0.05^{1}	0.2
Edible offals	0.05^{1}	0.2
Bovine		
Muscle	0.05^{1}	2 2
Fat tissue	0.064	
Liver	0.05^{1}	0.2
Kidney	0.05^{1}	0.2
Edible offals	0.05^{1}	0.2
Poultry		
Muscle	0.05^{1}	0.1
Fat tissue	0.05^{1}	0.1
Liver	0.05^{1}	0.05^{2}
Kidney	0.05^{1}	0.05^{2}
Edible offals	0.05^{1}	0.05^{2}
Milk		
Cattle	0.01^{1}	0.05
Birds eggs		
Chicken	0.01^{1}	0.05^{2}

¹ Indicates lower limit of detection

The calculated residue concentration from biocide intake is shown to be lower than the residue concentration in animal commodities derived from the lowest feeding level of the indicated animal feeding studies. As the animal commodity MRLs are calculated from the results of the lowest feeding study level, the animal commodity residue concentration derived from the biocide use are covered by the existing MRLs.

A dietary risk assessment for consumers was conducted based of the following maximum residues derived from the feeding studies. These maximum residues are considered to be worst case values regarding the Fendona 1.5 SC rural hygiene biocide use.

0.05	mg/kg	for swine meat, liver, kidney and edible offals
0.16	mg/kg	for swine fat
0.05	mg/kg	for bovine meat, liver, kidney and edible offals
0.064	mg/kg	for bovine fat
0.05	mg/kg	for poultry meat, fat, liver, kidney and edible offals
0.01	mg/kg	for milk
0.01	mg/kg	for eggs

Assessments of the potential chronic and acute dietary consumer risk due to exposure to residues of alpha-cypermethrin were performed using the EFSA model for chronic and acute risk assessment - rev. 2_0 (Model PRIMo). The EFSA model was used since it considers all the different diets in the EU and all consumer groups.

The ADI and ARfD for the a.s. alpha-cypermethrin are 0.015 mg/kg bw/day and 0.04 mg/kg bw, respectively.

² Indicated lower limit of analytical determination

Results of the chronic dietary risk assessment

The chronic dietary risk assessment was conducted using EFSA PRIMo (Rrev.2) and the highly conservative maximum residues for animal commodities as shown above. A more realistic chronic dietary risk assessment has also been conducted with the highest residues from feeding studies as outlined in the table above taking into account, that over lifetime the daily consumption of produce of animal origin at the MRL level is highly unlikely.

I addition, a dietary risk assessment was conducted using the consumption data from the standard EMA food basket. This dietary exposure assessment was also conduced using the animal commodity MRLs as outlined above in addition to the residue levels as derived from the animal feeding studies to derive a theoretical maximum daily intake (TMDI).

Chronic dietary risk assessment	% A	DI
Input values	MRL	Feeding study residuelevel
EFSA PriMo (Rev.2)	48%	4.0%
EMA standard food basket - Ruminants	89%	4.5%
EMA standard food basket - Pigs	81%	3.4%
EMA standard food basket - Poultry	5.3%	2.9%

^{*} ADI: 0.015 mg/kg bw/day

When calculating the chronic exposure of consumers using the EMA standard food basket and using the highly conservative MRLs of the animal commodities under investigation as input parameters, it was demonstrated that none of the commoditieds exceeded the acceptable daily intake (ADI), with the highest use being produce of ruminant origin with 89%. When replacing the MRIs with the much more realistic values derived from the animal feeding studies, it becomes apparent that all commodities range belkow 5% of the ADI.

The use of PriMo (Rev. 2), taking into account pan-European and WHO listed diets as tool for the exposure assessment of the concerned population, shows that the use of the highly conservative MRL values for alpha-cypermethrin biocidal uses will not exceed a TMDI of 40% of the acceptable daily intake (ADI).

According to the presented TMDI calculations a long-term intake of alpha-cypermethrin residues is unlikely to present a public health concern, even when the worst case situation is considered.

Results of the acute dietary risk assessment

The acute dietary risk assessment was performed according to the EFSA PriMo (Rev. 2), applying the maximum residue levels (MRLs). These maximum residues are considered to be worst case values regarding the Fendona 6 SC rural hygiene biocide use and taking into account that for short term exposure (acute dietary exposure) the use of the highly conservative MRLs as exposure input parameter are adressing the requirement to investigate potential consumption of single large portion at the maximum residue level. As the EMA standard food basket does not provide a respective value for singler larger portions, the EFSA PriMo (Rev. 2) was only used to derive this acute dietary risk assessment.

The top 5 commodities are reported. The IESTI (International Estimated Short Term Intake) is lower than 90%. Please refer to Annex 3.2, Table 10 for details.

Results of acute risk assessm	ent: children	Results of acute risk as	sessment: adults
	Highest		Highest
	exposure		exposure
	IESTI 1 –		IESTI 1 -
	% of ARfd*		% of ARfD*
Bovine: Meat	64	Bovine: Meat	30
Swine: Meat	42	Swine: Meat	25
Cattle: Milk and milk products	16	Goat: Meat	8
Bovine: Fat	10	Swine: Fat	7
Swine: Fat	6	Bovine: Fat	3

^{*} ARfD: 0.04 mg/kg bw/day

The acute risk assessment showed no exceedance of the ARfD for children and adults for both IESTI calculations.

Risk characterisation from combined exposure to several active substances or substances of concern within a biocidal product

No substances of concern were identified. Therefore exposure to several a.s. or substances of concern within the products is not relevant.

Major change application

The changes / additional data scoped in the major change application do not impact on the properties of the product regarding human health, or the output of the exposure assessment.

2.2.7 Risk assessment for animal health

General remarks

Based on the data requirements laid down in the Biocidal Products Regulation (BPR), the safety of animals after application of b.p. has to be addressed as well. For this reason, the safety of alpha-cypermethrin for livestock animals housed in stables treated with Fendona 1.5 SC is being assessed.

The livestock animal safety assessment is conducted for the following animal species:

- Calf, beef cattle, dairy cattle
- Fattening pig, breeding pig
- Broiler chickens, laying hen

Orientating tolerable intake value deduction for alpha-cypermethrin in the animal safety assessment

Repeated dose toxicity studies showed that the main target organ of alpha-cypermethrin is the nervous system (CNS and peripheral motor nerves). Signs of acute toxicity in rats following oral administration included clonic convulsions, salivation, ataxia, lethargy, piloerection and diarrhoea. Alpha-cypermethrin was found to have a low magnitude of toxicity by dermal and inhalation routes of exposure. In repeated-dose studies, symptoms of toxicity were described as hypersensitivity to external stimuli, ataxia, nervousness, hyperactivity, tremors and splayed gait. Again, this was confirmed in an acute oral neurotoxicity study in rats. A 4-weeks neurotoxicity study in rats aiming at the identification of the toxic mechanism showed that the effects of alpha-cypermethrin are likely due to a pharmacological effect rather than the consequence of structural damage, despite sporadic incidences of slight degeneration of the sciatic nerve.

Since the exposure scenarios for the animals are considered as acute scenarios and as the substance is not subject to bioaccumulation and recovery from acute neurotoxicity effects can be assumed to occur relatively quickly following exposure, the NOAEL value for the derivation of the AELacute was used to derive an orientating tolerable intake value for the livestock safety assessment. Based on the CAR of alpha-cypermethrin, the NOAEL of the acute neurotoxicity study in rats is selected in agreement with the toxic mechanism of alpha-cypermethrin. The NOAEL for acute neurotoxicity effects could be established at 4.0 mg/kg bw/day. Taking into account the oral absorption factor of 0.45 and dividing the NOAEL value of 4.0 mg/kg bw/day by an inter-species assessment factor of 10, an orientating tolerable oral intake value of **0.18 mg/kg bw/day** is derived. An assessment factor of 10 is considered conservative for the purpose of the animal safety assessment as a factor of 5 is taken into consideration for long-term exposure according to the EFSA Guidance on Risk Assessment for Birds and Mammals (first published Dec. 2009)¹. For this reason, the deduction of an orientating tolerable intake value for livestock animals has been based on very conservative assumptions.

1

Guidance of EFSA, Risk Assessment for Birds and Mammals, on request form EFSA, Question No EFSA-Q-2009-00223, first published on 17 December 2009

Animal exposure calculations

Animals can be exposed to the biocidal a.s. by different routes of exposure: inhalation, oral uptake and dermal uptake.

Animal exposure calculations were conducted according to European Commission Draft Guidance on Estimating Livestock Exposure to Active Substances used in Biocidal Products (see Section "Estimating Livestock Exposure to Active Substances used in Biocidal Products").

Data on distribution, metabolism and excretion on the a.s. showed that following a single oral application, approximately 43% of the dose is absorbed and eliminated within 24 hours via urinary excretion (CAR, Belgium). Thus, for the animal exposure assessment it is proposed to take into account the oral absorption factor of 0.45.

The default dermal absorption value of 75% based on the most recent EFSA Guidance on Skin Absorption (2012) was considered in the assessment of animal exposure towards alphacypermethrin.

The exposure estimations for the respective livestock animal species are presented in the following tabe.

	Biocide intake, Tier 1 [mg/animal/ day]	Biocide intake, Tier 1 [mg/kg bw/day]	Absorption factor	Biocide intake, Tier 2 [mg/kg bw/day]	
Calf (body weight: 2	200 kg)	T		1	
Oral exposure through licking of surface	2.04	0.0102	0.45	0.0046	
Oral exposure through uptake of contaminated feed	1.65	0.0083	0.45	0.0037	
Dermal exposure through rubbing against surfaces	22.19	0.1110	0.75	0.0832	
Inhalation exposure	0.0016	0.00001	1	0.00001	
Sum, Tier 2 (Realistic worst case estimate) 0.0915					
Beef cattle (body w	reiaht: 500 ka)				
Oral exposure through uptake of contaminated feed	2.31	0.0046	0.45	0.0021	
Dermal exposure through rubbing against surfaces	36.72	0.0734	0.75	0.0551	
Inhalation exposure	0.0032	0.00001	1	0.00001	
Sum, Tier 2 (Realistic worst case estimate) 0.0572					
Dairy cattle (body v	weight: 650 kg)				
Oral exposure through uptake of contaminated feed	9.57	0.0147	0.45	0.0066	

	Biocide intake, Tier 1 [mg/animal/ day]	Biocide intake, Tier 1 [mg/kg bw/day]	Absorption factor	Biocide intake, Tier 2 [mg/kg bw/day]
Dermal exposure through rubbing against surfaces	42.84	0.0659	0.75	0.0494
Inhalation exposure	0.0040	0.00001	1	0.00001
Sum, Tier 2 (Realis	stic worst case esti	imate)		0.0561
Eattoning nig (hod)	v woight: 100 kg)			
Oral exposure through uptake of contaminated feed	3.96	0.0396	0.45	0.0178
Dermal exposure through rubbing against surfaces	11.48	0.1148	0.75	0.0861
Inhalation exposure	0.0009	0.00001	1	0.00001
	stic worst case esti	imate)		0.1039
Oral exposure through uptake of	vidual housing) (bo	0.0305	0.45	0.0137
contaminated feed Dermal exposure through rubbing against surfaces	21.42	0.0824	0.75	0.0618
Inhalation exposure	0.0019	0.00001	1	0.00001
- I	stic worst case esti	imate)	<u> </u>	0.0755
-	ı p housing) (body w	_		
Oral exposure through uptake of contaminated feed	9.24	0.0355	0.45	0.0160
Dermal exposure through rubbing against surfaces	21.42	0.0824	0.75	0.0618
Inhalation exposure	0.0019	0.00001	1	0.00001
	stic worst case esti	imate)		0.0778
Broiler Chickens (Free range, litter fl	oor) (hody woight: 1	1.7 kg)	
Oral exposure (fly consumption	0.0210	0.0124	0.45	0.0056
Dermal exposure	0.132	0.0776	0.75	0.0582
Inhalation exposure	0.00002	0.00001	1	0.00001
	stic worst case esti	imate)	1	0.0638

	Biocide intake, Tier 1 [mg/animal/ day]	Biocide intake, Tier 1 [mg/kg bw/day]	Absorption factor	Biocide intake, Tier 2 [mg/kg bw/day]
Parent Broiler chic	ckens (free range, e	grating floor) (body	/ weight: 1.7 kg)	
Oral exposure (fly consumption	0.0210	0.0124	0.45	0.0056
Dermal exposure	0.141	0.0829	0.75	0.0622
Inhalation exposure	0.00002	0.00001	1	0.00001
	stic worst case est	mate)	ı	0.0678
Broiler chickens, r	earing (free range,	grating floor) (boo	dv weight: 1.7 kg)	
Oral exposure (fly consumption	0.0210	0.0124	0.45	0.0056
Dermal exposure	0.138	0.0812	0.75	0.0609
Inhalation exposure	0.00002	0.00001	1	0.00001
	stic worst case est	mate)		0.0664
Laving hens (Ratte	ery without trough) (hody weight: 1 9 l	(a)	
Oral exposure (fly consumption	0.0210	0.0111	0.45	0.0050
Dermal exposure	0.173 0.086	0.0911 0.045	0.75	0.0683 0.034
Inhalation exposure	0.00002	0.00001	1	0.00001
	stic worst case est	imate)		0.0733 0.039
Laying hens (Batto	ery with trough) (b	ody weight: 1.9 kg)		
Oral exposure (fly consumption	0.0210	0.0111	0.45	0.0050
Oral exposure (feed)	0.033	0.0174	0.45	0.0078
Dermal exposure	0.173 0.086	0.0911 0.045	0.75	0.0683 0.034
Inhalation exposure	0.00002	0.00001	1	0.00001
Sum, Tier 2 (Reali	stic worst case est	imate)		0.0811 0.047
Laying hens (free	range, litter floors	(body weight: 1.9 k	(g)	
Oral exposure (fly consumption	0.0210	0.0111	0.45	0.0050
Dermal exposure	0.335	0.1763	0.75	0.1322
Inhalation exposure	0.00002	0.00001	1	0.00001
	stic worst case est	mate)		0.1372
Laying hens (free	range, grating floo	rs) (bodv weiaht: 1.	9 kg)	
Oral exposure (fly consumption	0.0210	0.0111	0.45	0.0050
Dermal exposure	0.150	0.0789	0.75	0.0592

	Biocide intake, Tier 1 [mg/animal/ day]	Biocide intake, Tier 1 [mg/kg bw/day]	Absorption factor	Biocide intake, Tier 2 [mg/kg bw/day]
Inhalation	0.00002	0.00001	1	0.00001
exposure	0.00002	0.00001	-	0.00001
Sum, Tier 2 (Realistic worst case estimate)				0.0642

Livestock animal risk assessment

The exposure estimations for the respective livestock animal species and the comparison with the reference value are presented in the following table.

Animal species	Biocide intake, Tier 2	Hazard Quotient ¹	MoE ²	Acceptable (yes/no)
Calf	[mg/kg bw/day]	0.51	20	Yes
Beef cattle	0.0915 0.0572	0.32	31	Yes
Dairy cattle	0.0561	0.31	32	Yes
Fattening pig	0.1039	0.58	17	Yes
Breeding pig (individual housing)	0.0755	0.42	24	Yes
Breeding pig (group housing)	0.0778	0.43	23	Yes
Broiler Chickens (free range, litter floor)	0.0638	0.35	28	Yes
Parent Broiler Chicken (free range, grating floor	0.0678	0.38	27	Yes
Broiler chickens, rearing (free range, grating floor	0.0664	0.37	27	Yes
Laying hens (battery without trough)	0.0733 0.039	0.41 0.22	25	Yes
Laying hens (battery with trough)	0.0811 0.047	0.45 0.26	22	Yes
Laying hens (free range, litter floor)	0.1372	0.76	13	Yes
Laying hens (free range, grating floor)	0.0642	0.36	28	Yes

¹ Hazard Quotient: Exposure/Orientating tolerable intake value (0.18 mg/kg bw/day)

 $^{^2}$ based on NOAEL_{acute, systemic} of 1.8 mg/kg bw/day from acute neurotoxicity study in rats; based on the EFSA guidance document on birds and mammals, a TER of ≥ 5 is sufficient for chronic/long-term exposure

The exposure of livestock animals following treatment of surfaces in animal houses with Fendona 1.5 SC is considered safe and all exposure estimates are below the orientating reference value of 0.18 mg/kg bw/day as derived for the purpose of the livestock animal safety assessment. The margins of exposure (MoE) are sufficiently high as according to the EFSA guidance document for birds and mammals, a TER ratio of \geq 5 provides a sufficient margin of safety for chronic/long-term exposure for birds and mammals.

Major change application

The changes / additional data scoped in the major change application do not impact on the properties of the product regarding animal health, or the output of the risk assessment.

2.2.8 Risk assessment for the environment

The biocidal product (b.p.) Fendona 1.5 SC is claimed for use by non-professional users in urban pest control (Domestic/Households/Private Areas) as well as by professional and non-professional users in rural hygiene (Animal Houses/Shelters) as insecticide in product type (PT) 18.

2.2.8.1 Effects assessment on the environment

The following PNEC values are taken directly from the Assessment Report of the active substance alpha-cypermethrin²:

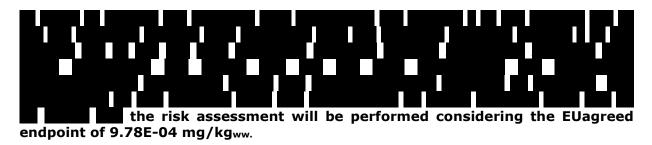
PNEC_{STP}: 100 mg/L

PNEC_{Surface water}: 4.8E-06 mg/L

• PNEC_{Sediment}: 9.78E-04 mg/kgww (EU agreed)

PNECsoil: 0.882 mg/kgww

PNEC_{oral, mammals}: 2.67 mg/kg_{food}
 PNEC_{oral, birds}: 5.0 mg/kg_{food}



Major change application

The risk assessment has been updated and is no longer refined with the new tests performed with *Chironomus riparius* (as stated above). The endpoints of these studies are now considered as supportive information only as in this application they will not be used in the risk assessment because they are not EU-agreed. The risk assessment will be performed considering the EU-agreed endpoint of 9.78E-04 mg/kgww.

Information relating to the ecotoxicity of the biocidal product which is sufficient to enable a decision to be made concerning the classification of the product is required

The classification of the biocidal product is based on the classification of the active substance alpha-cypermethrin (H400, M-factor: 1,000; H410, M-factor: 1,000). Taking the classification of the active substance into account and according to summation method described in the CLP Regulation, the biocidal product is classified as Aquatic Acute 1 (H400) and Aquatic Chronic 1 (H410).

Further Ecotoxicological studies

http://dissemination.echa.europa.eu/Biocides/ActiveSubstances/1238-18/1238-18 Assessment Report.pdf



Summary table - Further ecotoxicological studies







Conclusion used in	Conclusion used in Risk Assessment – Further ecotoxicological studies				
Value/conclusion	See next row.				
Justification for the value/conclusion	assessment will be performed considering the EUagreed endpoint of 9.78E-04 mg/kgww.				

Major change application

The endpoints of these studies are considered as supportive information only and they will not be used in the risk assessment because they are not EU-agreed. The risk assessment will be performed considering the EU agreed endpoint of 9.78E-04 mg/kgww.

Data waiving Information Effects on aquatic organisms requirement Justification no further ecotoxicity data are available for the biocidal product (b.p.) Fendona 6 SC. The toxicity of the active substance (a.s.) and the co-formulants is known and no synergistic effects are expected. Ecotoxicological properties and classification of the b.p. can be deduced from the respective properties of the a.s. and the coformulants using the conventional method described in the guidance for classifying mixtures under Regulation (EC) No 1272/2008 (CLP). The a.s. alpha-cypermethrin is classified for the environment with Aquatic Acute 1 (H400), M-factor 1,000 and Aquatic Chronic 1 (H410), M-factor 1,000. Only two additional components of the b.p. are classified for environmental hazards. The remaining components of the b.p. are not classified for the environment. However, since alpha-cypermethrin exhibits the most stringent environmental classification and the additional ingredients are only present at a lower concentration compared to the a.s., alpha-cypermethrin alone is driving the environmental classification of the b.p. as Aquatic Acute 1 (H400) and Aquatic Chronic 1 (H410). The route of environmental exposure of alpha-cypermethrin is via STP to surface water (incl. sediment) in the urban pest control and via slurry/manure application to soil with subsequent run-off to surface water (incl. sediment). For the a.s., data on sludge microorganisms, on acute and chronic toxicity to fish, invertebrates, algae as well as chronic studies with sediment dwelling organisms are available. For the terrestrial compartment, an acute study with earthworms and a nitrogen/carbon mineralization study are available. The BCF was also determined experimentally. The formulation type of the b.p. is not expected to change the mode of action of the active substance or its bioavailability. Hence, also in view of Article 21 (1(a)) of EU Regulation No 528/2012 (22 May 2012) and owing to the use and exposure considerations as mentioned above, there is no need to further investigate the ecotoxicological effects for the b.p..

Data waiving	
Information	Effects on terrestrial organisms
requirement	
Justification	Please see justification under point "Further Ecotoxicological studies
	- Effects on aquatic organisms".

Effects on any other specific, non-target organisms (flora and fauna) believed to be at risk (ADS)

Data waiving	
Information requirement	Information on the risks to any other specific, non-target organisms (flora and fauna) believed to be at risk (ADS)
Justification	Please see justification under point "Further Ecotoxicological studies – Effects on aquatic organisms".

Supervised trials to assess risks to non-target organisms under field conditions

Data waiving		
Information	Information on the risks to non-target organisms under field	
requirement	conditions is not required.	
Justification	Please see justification under point "Further Ecotoxicological studies – Effects on aquatic organisms".	

Studies on acceptance by ingestion of the biocidal product by any non-target organisms thought to be at risk

Data waiving	
Information	Information on the acceptance by ingestion of the biocidal product
requirement	by any non-target organisms is not need required.
Justification	The b.p. does not contain any lure which could be attractive for non-target organisms. Therefore, ingestion by non-target organisms is no matter of concern. Moreover, the b.p. is not marketed in the form of
	granules.

Secondary ecological effect e.g. when a large proportion of a specific habitat type is treated (ADS)

The b.p. is a concentrate to be used by professionals and non-professionals in Product Type 18. The mode of application is spraying in closed facilities (e.g. in household, large public buildings and stable disinfection). The b.p. as such will therefore not enter the environment directly but only via manure/slurry application on land or via the STP route. Thus, non-target organisms are not directly exposed to the b.p.. A large space application of the biocidal product to water body, wetland, forest or field is not intended and information on secondary ecological effects is therefore not required.

Foreseeable routes of entry into the environment on the basis of the use envisaged

Formulation of the biocidal product

Fendona 1.5 SC (BAS 310 22 I) is manufactured by converting alpha-cypermethrin TC to a slurry with part of the co-formulants and milling in a bead mill to achieve the appropriate particle size. The remaining co-formulants are added thereafter. The resulting technical concentrate is homogenized subsequently with the additional co-formulants required by the BAS 310 22 I formulation. Quality control examines every batch of the product for essential parameter like active substance content, density, particle size and wet sieving residue. This guarantees the constant quality of the end-use product Fendona 1.5 SC (BAS 310 22 I) according to its specification.

No environmental exposure is anticipated during the formulation process. The production facility utilizes controls to prevent environmental release and exposure of any of the components of the biocidal product. The finished biocidal product is packaged and sealed to prevent leakage. The ingredients and finished product are not volatile; therefore, gaseous emissions are negligible. All waste containing residue of the active substance are collected separately and sent to a treatment plant for incineration. The effluents from the formulation steps and the cleaning of the apparatus are disposed according to local regulations and according to the BASF principle of responsible care.

In conclusion, from the formulation of the biocidal product no emissions to the environment occur and therefore, no risk assessment was conducted for this life cycle stage.

Application and use of the biocidal product

The biocidal product Fendona 1.5 SC is used as insecticide in PT 18, both in urban pest control (Domestic/Households/Private Areas) as well as in rural hygiene applications (Animal Houses/Shelters). It is used indoors by non-professionals in urban pest control as well as by professionals and non-professionals in rural hygiene. The b.p. is a concentrate, which will further be diluted with water and applied by spraying. In detail, the following uses are covered:

- Scenario 1: Urban pest control in private domestic (non-professionals)
- Scenario 2: Rural hygiene in animal houses/shelters (professionals and nonprofessionals)

For the urban scenario, the route of exposure of alpha-cypermethrin to the environment is via STP, which is the primary receiving compartment, to surface water, sediment, soil and groundwater (via sludge application). For the use in rural hygiene, the route of exposure is via application of manure/slurry to agricultural land. Release from the facility drain to an STP and subsequent compartments was not considered for the use in rural hygiene as Fendona 1.5 SC must not be used in stables/animal housings connected to a sewage treatment plant. Relevant receiving compartments are soil, groundwater and surface water.

Further studies on fate and behaviour in the environment (ADS)

Data waiving	
Information requirement	Further studies on fate and behaviour in the environment are not required.
Justification	Direct emissions of the biocidal product to the environmental compartments surface water (incl. sediment) and soil are unlikely. The data on the active substance gives sufficient information regarding its fate and behaviour in the environment and there are no indications of risk due to specific properties of the biocidal product as it does not contain any substance of concern for the environment. The formulation type is not expected to change the mode of action of the active substance or its bioavailability. The fate of alphacypermethrin is covered by the data provided for the active substance.

Leaching behaviour (ADS)

Leaching is not relevant for the use of the biocidal product in PT 18.

Testing for distribution and dissipation in soil (ADS)

Data waiving	
Information	Information on distribution and dissipation in soil is not required.
requirement	
Justification	The data on the distribution and dissipation of the a.s. gives sufficient information and there are no indications of risk due to specific properties of the b.p The emissions to soil exclusively occur via sewage sludge or slurry/manure applications. Several field and laboratory degradation studies in soil are available for alpha-cypermethrin, showing aerobic degradation of the a.s. with half-lives ranging from < 14 to 112 days (12°C). CO ₂ was the only detected major metabolite. All other metabolites formed were minor metabolites (formed in amounts < 10%). In all of the studies, 90 % of dissipation occurred within a year. Alpha-cypermethrin will therefore not persist in soil. Furthermore, the components of the biocidal product do not influence the distribution characteristics of the a.s The formulation types are not expected to change the model of action of the a.s or its bioavailability. Further testing for distribution and dissipation in the environment is
	therefore not deemed reasonable.

Testing for distribution and dissipation in water and sediment (ADS)

Data waiving	
Information	Information on distribution and dissipation in water and sediment is
requirement	not required.
Justification	The data on the distribution and dissipation of the a.s. gives sufficient information and there are no indications of risk due to specific properties of the b.p The emissions to sediment exclusively occur via sewage sludge or slurry/manure applications. Higher tier water-sediment degradation studies are available for alpha-cypermethrin showing that alpha-cypermethrin moved rapidly from the water phase to the sediment phase with a DT ₅₀ in the water phase of between 0.88 and 4 days and in sediment between 12 and 67 days (12°C). The main degradation products formed were cis-2,2-dimethyl-3-(2',2'-dichlorovinyl)cyclopropane carboxylic acid isomers (DT ₅₀ 27-70 days) and 3-phenoxybenzoic acid (DT ₅₀ 4-6 days), both of which underwent further degradation to CO ₂ , showing aerobic degradation of the a.s. with half-lives ranging from < 14 to 112 days (12°C). Alphacypermethrin will therefore not persist in sediment. Furthermore, the components of the product do not influence the distribution characteristics of the a.s Further testing for distribution and dissipation in the environment is therefore not deemed reasonable.

Testing for distribution and dissipation in air (ADS)

Data waiving	
Information requirement	Information on distribution and dissipation in air is not required.
Justification	Volatilisation to the atmosphere following normal biocidal use of the b.p. is limited due to the very low vapour pressure (3.4×10^{-7} Pa at room temperature). Accumulation in air does not occur due to the low air photolysis DT ₅₀ of 10.4 h. Thus, accumulation and transport in air can be excluded and further testing is not deemed reasonable.

If the biocidal product is to be sprayed near to surface waters then an overspray study may be required to assess risks to aquatic organisms or plants under field conditions (ADS)

Data waiving	
Information requirement	Information on risks to aquatic organisms or plants under field conditions in not required.
Justification	The b.p. is only applied via spraying in closed facilities like e.g. private houses or stables. No outdoor use is foreseen. An overspray study is therefore considered to be unnecessary.

Data waiving	
Information requirement	Information on aquatic chronic toxicity is not required.
Justification	No direct emissions of the b.p. to surface water occur. Moreover, chronic data on aquatic toxicity of the a.s. gives sufficient information about the ecotoxicity of the b.p. as there are no indications of risk due to specific properties of the biocidal product.

Data waiving	
Information	Information on aquatic bioconcentration is not required.
requirement	
Justification	No direct emissions of the b.p. to surface water occur. Moreover, a bioconcentration study was conducted with the a.s. giving sufficient information about the bioconcentration potential of the b.p. as there are no indications of bioconcentration due to specific properties of the biocidal product.

If the biocidal product is to be sprayed outside or if potential for large scale formation of dust is given then data on overspray behaviour may be required to assess risks to bees and non-target arthropods under field conditions (ADS)

The b.p. is not intended to be used outside and there are is no potential for large scale formation of dust. Therefore, the risk to bees and non-target arthropods under field conditions has not further to be assessed.

2.2.8.2 Exposure assessment

The current section relates to the environmental exposure assessment for the biocidal product Fendona 1.5 SC, a water-based concentrate containing 15g alpha cypermethrin per litre, corresponding to 1.58 % (w/w) active substance (TGAI).

General information

Assessed PT	PT 18
Assessed scenarios	Scenario 1: Urban pest control in private houses (non-professionals)
	Scenario 2: Rural hygiene in animal houses/shelters (professionals and non-professionals)
FGD()	Emission Scenario Documents for Product Type 18: Emission Scenario Document for Insecticides, Acaricides and Products to Control Other Arthropods for Household and
ESD(s) used	Professional use; July 2008 ³ Emission Scenario Document for Insecticides for Stables and
	Manure Storage Systems; January 2006 ⁴
Approach	Scenario 1: Average consumption
P.P	Scenario 2: Average consumption
Distribution in the	Calculated based on the ESDs for PT18 and on Guidance on the Biocidal Products Regulation, Volume IV Environment -
environment	Part B Risk Assessment (active substances), April 2015 ⁵
Groundwater simulation	No higher tier modelling, using e.g. FOCUS was performed
Confidential Annexes	No
	Scenarios 1 and 2:
Life cycle steps assessed	Production: No
Life cycle steps assessed	Formulation Yes (qualitatively)
	Use: Yes
Remarks	No remarks

Releases into the environment can take place from processes at any stage of the life-cycle of a substance. However, from the formulation of the biocidal product no environmental exposure is anticipated. The production facility utilises controls to prevent environmental release and exposure of any of the components of the biocidal product. The local scale environmental emissions associated with the Applicant's envisaged use (indoor use

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http://echa.europa.eu/documents/10162/16908203/pt18 oecd esd household profess ional uses en.pdf

http://echa.europa.eu/documents/10162/16908203/pt18 insecticides for stables and manure en.pdf

 $[\]underline{\text{http://echa.europa.eu/documents/10162/15623299/bpr guidance ra vol iv part b e}} \\ \underline{\text{n.pdf}}$

exclusively) for Fendona, as a professional spray product, are considered to represent the worst case scenario in terms of predicted environmental concentrations (PECs). Since the use pattern of Fendona is exclusively indoor and due to low tonnage (See confidential annex – Appendix I to Document III-A), it is not relevant to assess the regional risk. The environmental exposure assessment is performed only on a **local basis**.

In the following emission estimation for the product, alpha-cypermethrin is used for the emission calculations, as the exclusive active substance, of the given biocidal product.

The environmental exposure assessment has been produced using all available information taken from the Assessment Report for alpha cypermethrin. Information and guidance was derived from the Biocidal Products Regulation, Volume IV Environment - Assessment & Evaluation, Part B (TGD; EC, 2017). Under the intended uses of the product, i.e., (1) urban pest control in domestic houses and large buildings & (2) rural hygiene in animal houses/shelters, Emission Scenario Document (ESD) (PT 18) for (1) 'Insecticides, acaricides and products to control arthropods for household and professional use' (July 17, 2008) & (2) ESD for Insecticides for Stables and Manure Storage Systems (Jan, 25, 2006) were included to derive the PEC values for risk assessment evaluation.

Distribution in the environment is calculated based on the above guideline documents.

Table 1. Application details for Scenario 1—Urban pest control (domestic, household and private areas)

Application method(s)	Apply using any conventional manual or power sprayer equipped to produce a coarse spray at low pressure. The appropriate volume of Fendona 1.5 SC is added to the required volume of clean water and agitated. If a delay occurs between treatments, re-agitation is needed before re-use. For crawling insects it is applied as a coarse spray to cracks & crevices, and/or onto targeted spots or areas where insects may crawl and hide. For flying insects it is applied as a coarse spray onto targeted spots or areas where insects may settle.
Application rate(s) and frequency	20 mL product are diluted in 1 L water (1:50; spray concentration:2.0% v/v). 1 L of diluted product is applied per
requeries	20 m ² surface area. Frequency: 3-11 applications per year.
Category(ies) of user(s)	Non-professional

Table 2. Application details for Scenario 2 – Rural hygiene (Animal Houses/Shelters)

Application method(s)	It is applied using any conventional manual or power sprayer equipped to produce a coarse spray at low pressure. The appropriate volume of Fendona 1.5 SC is added to the required volume of clean water and agitated. If a delay occurs between treatments, re-agitation is needed before re-use.			
Application rate(s) and frequency	Fendona 1.5 SC (mL) LOW DOSE RATE	Fendona 1.5 SC (mL) HIGH DOSE RATE	Water volume for dilution (L)	Surface area treated (m2)
	20	40	1	20
	10	20	0.5	10
	5	10	0.25	5
	20 ml product is diluted in 1 liter water (1:50; 2.0% v/v), whereas, at the high dose rate: 40 ml product is diluted in 1 liter water (1:25; 4.0% v/v). Frequency: up to 6 applications per year 4 applications for animal (sub)categories: Laying hen, battery cages without treatment, Laying hen, battery cages with forced drying, Laying hen, compact battery cages, Laying hen, free range with grating floor, Parent broiler >18 weeks, free range with grating floor, Parent broiler in rearing, free range with grating floor, 6 applications for animal (sub)categories: Dairy cow, Beef, Veal Calf, Sow, individual pens, sows in groups, Fattening pig			
Category(ies) of user(s)	Non-professional and professional (depending on the Member State's definition of professional in this use area description)			

No substance of concern is contained in the b.p. with regards to the environment.

Fate and distribution in exposed environmental compartments

• Sewage treatment plants (STP)

Sewage water treatment plants are regarded as the only pathway of alpha-cypermethrin emissions after use as indoor insecticide. Possible entry pathways of wastewater during normal use of the product are via wet cleaning operations of treated surfaces, which will result in very low rates of active substance, which might be washed from treated surfaces. The consecutive cleaning of the spraying equipment can also be a possible source for alpha-cypermethrin to the sewer system.

• Surface water and sediment

Due to the intended indoor use, there are no direct emissions of alpha-cypermethrin to surface water and sediments. The exposure to surface water and sediment is indirect via STP effluents.

• Soil, groundwater and air

Due to the exclusive indoor use-pattern of alpha-cypermethrin as an insecticide potential direct contamination of the environment via the pathways air, soil or groundwater is considered negligible. However, STP sludge might be applied to soils. Therefore, the STP sludge concentration and the concentrations in soil after one year and ten years of sludge application are calculated.

• Biota

Indirect exposures to biota are possible via water sediment (potential bioconcentration in fish or mammals leading to secondary poisoning of fish-eating birds or fish-eating mammals).

Parameters assessed for the fate and distribution of alpha-cypermethrin in the environment

A brief summary on fate and distribution in the environment of alpha-cypermethrin is presented below. The values taken from the Assessment Report for the active substance have been incorporated into the various equations and calculations (by TGD) to derive the PECs for alpha-cypermethrin.

 Table 3: Parameters used in environmental exposure scenario

	416.3 82.3	g/mol
Melting point	82.3	
		°C
	None (decomposes before boiling at atmospheric pressure)	°C
Vapour pressure	2.5*10 ⁻⁷ (20°C)	Pa
(at 25 °C)	5.6*10 ⁻⁷ (25°C, extrapolated)	
Water solubility	F 0 (nH 7)	/1
(at 20 °C)	5.8 (pH 7)	μg/L
Log Octanol/water partition coefficient	5.5	Log 10
Organic carbon/water partition coefficient (Koc)	76344	L/kg
Kp soil	1527	L/kg
Kp susp.	7634	L/kg
Henry's Law Constant (at 25°C)	0.069	Pa/m3/mol
Biodegradability	Not readily biodegradable	-
Rate constant for STP	0	h ⁻¹
DT ₅₀ for biodegradation in surface water (at 12 °C)	2.22	d
DT ₅₀ for hydrolysis in surface water (at 12 °C)	564 (pH 7)	d
DT ₅₀ for photolysis in surface water	3.4 - 6.3	d
DT ₅₀ for degradation in soil (at 12 °C)	112	d
DT ₅₀ for degradation in air	3.47	hr

Degradation of alpha-cypermethrin in the different environmental compartments

• Degradation of alpha-cypermethrin in the aquatic compartment (including sediment)

Alpha-cypermethrin has been shown to be stable at pH 4 and hydrolyse very slowly under environmental temperature of 12°C and pH 7 with predicted DT $_{50}$ of 564.4 days. Whereas, at more alkaline pH (pH 9) alpha-cypermethrin showed a DT $_{50}$ of 9.9 days (Van Dijk, 1993). A major metabolite was identified as 3-phenoxybenzaldehyde (CAS-no. 39515-51-0). Photolysis will contribute to degradation of alpha-cypermethrin with a DT $_{50}$ of 4.85 days predicted from the available data after adjustment for natural sunlight (Concha *et al.*, 2001). Alpha-cypermethrin is not readily biodegradable according to OECD 301 B and D guidelines (Stone and Watkinson, 1983).

In the water-sediment degradation studies using samples from natural aquatic systems, alpha-cypermethrin incubated in the dark disappeared rapidly from the water phase due to strong adsorption to the sediment and metabolisation. Alpha-cypermethrin was also readily eliminated in the sediment phase, by metabolisation and formation of bound residues. Alpha-cypermethrin quickly moves from the water phase into the sediment with DT $_{50}$ in water ranging between 0.8 and 4 days, and in sediment between 12 and 67 days. BE CA recalculated DT $_{50}$ water of 2.22 days and DT $_{50}$ sediment of 28.13 days at 12 °C (TGD, Part B, , formula 25).

The main degradation products formed were cis-2,2-dimethyl-3-(2',2'-dichlorovinyl)cyclopropane carboxylic acid isomers (CL 912554) and 3-phenoxybenzoic acid (CL 206128), both of which underwent further degradation to $^{14}\text{CO}_2$. The DT $_{50}$ of CL 912554 in the total system ranged between 27 and 70 days, and the DT $_{50}$ of CL 206128 ranged between 4 and 6 days.

Although there is no direct exposure, surface water and sediment are assessed for the environmental risk and PEC values calculated to cover the effects of alpha-cypermethrin residues in the STP effluent.

Information on the metabolites is available in the Assessment Report. The ecotoxicity data show that the metabolites are far less toxic to aquatic organisms compared to parent alpha-cypermethrin:

- The 48 h EC₅₀ (immobilisation) of cis-2,2-dimethyl-3-(2',2'-dichlorovinyl)cyclopropane carboxylic acid isomers (CL 912554) towards invertebrates (*Daphnia magna*) is 62 mg/L.
- The 48 h EC₅₀ (immobilisation) of 3-phenoxybenzoic acid (CL 206128) towards invertebrates (*Daphnia magna*) is 39 mg/L.
- The 48 h EC₅₀ (immobilisation) of 3-phenoxybenzaldehyde CL 206969 towards invertebrates (*Daphnia magna*) is 0.8 mg/L.

While the 48 h EC₅₀ (immobilisation) of alpha-cypermethrin (also *Daphnia magna*) is much lower $(0.3 \mu g/L)$.

Mobility of alpha-cypermethrin metabolites was shown to be minimal in laboratory leaching studies with alpha-cypermethrin.

Thus, it is demonstrated that the aqueous metabolites of alpha-cypermethrin are of less ecotoxicological significance than the parent compound with respect to invertebrate toxicity.

Degradation of alpha-cypermethrin in soils

Degradation of alpha-cypermethrin was investigated under aerobic conditions in a sandy loam soil (Gedik and Keirs, 2001). Alpha-cypermethrin seems to degrade in this type of soil with DT_{50} of 39.1 days at 12°C with CO_2 as the principal degradation product (~35% at 12°C). Four minor degradation products, including 3-phenoxybenzoic acid (CL 206128) ($\leq 5.44\%$ AR) and three unknowns, as well as polar materials, were also extracted from the soil (<9% of AR).

In addition to laboratory studies, field soil dissipation studies were also conducted (Doc. III-A7.2.2.2/01-09). Alpha-cypermethrin degradation was followed during three years with one application of EC alpha-cypermethrin formulation (0.5 kg a.s./ha). DT_{50} values ranged from <14 to 112 days. In all of these studies, 90% of the dissipation occurred within a year. The degradation product, 3-phenoxybenzoic acid (CL 206128), is degraded more rapidly than the parent compound.

Based on reliable adsorption/desorption data (Hill, 1993) it can be concluded that alphacypermethrin is strongly adsorbed in soil (Koc range 26492 to 144652, mean 76344ml/g, n=12). Based on common mobility classification schemes (McCall *et al.*, 1983; Fate of Chemicals in the Environment, ACS, pp. 105-123) alpha-cypermethrin is classified as immobile in soil (Koc > 5000).

A further study of the effect of sunlight on a soil surface indicated that alpha-cypermethrin is not rapidly degraded through photodegradation on soil surfaces with DT_{50} of 113.5 days at 12°C. The major product of photodegradation is 3-phenoxybenzoic acid (CL 206128) (16.4% AR) and 3-phenoxybenzaldehyde (CL 206969) is a minor degradation product (<3%).

• Degradation of alpha-cypermethrin in the atmosphere

Based on the vapour pressure (3.4×10^{-7} Pa at 25°C) and the Henry's law constant (0.069 Pa×m³/mol at 25°C), volatilisation of alpha-cypermethrin is negligible. The fate of alpha-cypermethrin in air was investigated using the quantitative structure activity relationship estimation method (QSAR; TGD, 2003) (Mangels, 1995), which considers the reaction with the daily air concentrations of hydroxyl radicals (OH•) and with the help of the software AOPWIN. The half-life was calculated at 3.47 hours. Therefore, alpha-cypermethrin is rapidly degraded by photochemical processes and due to its low vapour pressure alpha-cypermethrin is not considered as volatile. The air compartment is thus not considered further within the following exposure assessment.

• Taking together all this information, it is justified to disregard the metabolites in the environmental exposure and risk assessment and to base the assessment solely on alpha-cypermethrin.

SCENARIO 1 – Urban pest control; professional use in private houses and large buildings

Fendona 1.5 SC is a water-based concentrate containing 15 g alpha-cypermethrin per litre, corresponding to 1.58% (w/w) active substance (TGAI). According to the use instructions, it should be diluted with water 1:50 and the maximum prescribed application rate is defined as 1 mL b.p. $/m^2$. This results in an active substance concentration of 16 mg a.i. $/m^2$ treated area. The information is summarized in the table below.

Table 4. Input parameters for calculating the local emission						
Scenario 1: Urban pest control; professional use in private houses and large buildings (3-11 appl. per year)						
Application rate of biocidal product	1	mL/m²				
(concentrate)	or 1.023	g/L				
Concentration of active substance in the product 15 g/L						
Active substance concentration per treated m ² 16 mg/m ²						

Fendona 1.5 SC is intended to be used in targeted applications indoors in private houses by spraying with low pressure spray in cracks and crevices.

In the crack and crevice scenario, the product is only sprayed on targeted spots with a limited area. The total surface treated in a crack and crevices application in private houses is 2.0 m². Regarding the number of private houses, 4000 private houses are used as default value (Technical Agreement for Biocides (TAB), September 2015, ENV 75 and 76)

• In the following table, the compartments which are exposed from the use of alphacypermethrin in urban pest control; professional use in private houses and large buildings are given:

Table 5. Identification of relevant receiving compartments based on the exposure pathway – scenario 1									
Fresh- Freshwater Sea- Seawater STP* Air Soil Ground- Water Sediment Other							Other		
Scenario 1	Yes	Yes	No	No	Yes	n.a.	Yes	Yes	-

^{*} Only STP is directly exposed. All other compartments are indirectly exposed

Emission Estimation for Scenario 1

The estimations of environmental emissions are based on crack and crevices treatment approach. For emission calculations the following formulas (ESD for PT18 products, July 2008) were used to calculate daily local emission to STP (as STP is regarded as the only pathway of direct alpha-cypermethrin emissions after indoor use of Fendona):

Mixing/loading step

- (1) $E_{prep,air} = Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,air} \times 10^{-3}$
- (2) Eprep, applicator = $Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,applicator} \times 10^{-3}$
- (3) $E_{prep,floor} = Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,floor} \times 10^{-3}$

Application step

- (4) $E_{application,air} = N_{appl,building} \times F_{appl,air} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (5) $E_{application,applicator} = N_{appl,building} \times F_{appl,applicator} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (6) $E_{application,floor} = N_{appl,building} \times F_{appl,floor} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (7) Eapplication, treated = N_{appl} , building \times Fappl., treated \times Q_{prod} \times FAI \times AREA treated

Releases to wastewater and STP

- (8) $E_{applicator,ww} = (E_{prep,applicator} + E_{appl.,applicator}) \times F_{applicator,ww}$
- (9) $E_{treated,ww} = (E_{prep,floor} + E_{appl.,floor} + E_{appl.,treated}) \times F_{ww} \times F_{CE}$
- (10) $E_{waste\ water} = E_{applicator,ww} + E_{treated,ww}$
- (11) Elocalwaste water, total = $((Elocal_{waste water} \times N_{houses}) \times F_{simultaneity})$

The input parameter used for the environmental exposure assessment for urban pest control in cracks and crevices in private houses and large buildings are shown in Table 5. The following assumptions have been made:

- Number of applications per day per building (N_{appl,building}) is 1 both for the use in private houses.
- Number of preparations per day per building is (N_{prep,building}) is 1 for private houses
- Fraction emitted to floor during mixing/loading (F_{prep,floor}) was set to 1.0E-03 for amateurs, assuming 1L containers as worst case with unspecific design
- Fraction emitted to floor during application (Fapplication, floor) was set to 0.124 for trigger spray
- Fraction emitted to applicator during application (F_{application} applicator) was set to 6E-03 for trigger spray

- Fraction emitted to waste waters by the applicator during the cleaning step: Fapplicator
 www. is equal to 1 as 100% of the coveralls are considered washable;
- Fraction emitted to waste waters during the cleaning step: **F**_{ww}. is equal to 1 as 100% of the treated surfaces are washed with water;
- Cleaning efficiency for the cracks and crevices treatment: F_{CE} is 0.25 (ESD PT 18, Table 3.3-8, p.64);
- Simultaneity factor, $F_{\text{simultaneity}}$, represents the percentage of houses which are treated simultaneously (ESD PT18, p. 38-40). Calculations were made with the default F_{sim} of 0.815%, representing a frequency of use of 3 to 11 applications per year for the initial dossier.

The values to calculate daily local emission to STP after cracks and crevices application at a dose rate of 16 mg a.i./ m^2 are summarised in Table 6 below. The resulting total local emissions to the waste water are summarized in the table 7, calculated with the formula (11).

Table 6: Calculation of the local emissions to waste water – Scenario 1: Indoor crack and crevice treatment by non-professional users. Application – dose rate 15 mg a.i./m²

Input	Symbol	Unit	Private houses
Amount of active substance	Qai	Kg/m ²	1.60×10 ⁻⁵
Fraction of active substance in the commercial product	Fai	-	0.0158
	Mixing / Loa	ading stage	
Area treated/wet rooms	AREA _{treated}	m²	2
Fraction emitted to air during preparation step	F _{prep,air}	-	0
Fraction emitted to applicator during preparation step	F _{prep} ,applicator	-	1.2x10 ⁻³
Fraction emitted to floor during preparation step	F _{prep} ,floor	-	1.0×10 ⁻³
Quantity of commercial product used for the preparation per day	Qprod,prep	g	20.46
Number of preparations per day	$N_{prep,building}$	d ⁻¹	1
Emission to the air during preparation step (1)	E _{prep,air}	kg/d	0
Emission to the applicator during preparation step (2)	Eprep,applicator	kg/d	3.88×10 ⁻⁷

Emission to floor during preparation step (3)	Eprep,floor	kg/d	3.23×10 ⁻⁷
	Applica	ation	
Fraction emitted to air during application	Fapplication, air	-	0.02
Fraction emitted to applicator during application	Fapplication,applicator	-	6.0×10 ⁻³
Fraction emitted to floor during application	Fapplication,floor	-	0.124
Fraction emitted to treated surfaces during application	Fapplication,treated	-	0.85
Number of application per day per building	Napplication,building	d ⁻¹	1
Quantity of commercial product applied	Qprod	kg/m²	1.023×10-3
Emission to the air during application step (4)	Eapplication,air	kg/d	6.32×10 ⁻⁷
Emission to the applicator during application step (5)	Eapplication,applicator	kg/d	1.9 × 10 ⁻⁷
Emission to floor during application step (6)	Eapplication,floor	kg/d	3.92×10^{-6}
Emission to treated surfaces during application (7)	Eapplication,treated	kg/d	2.69 × 10 ⁻⁵
	Cleaning and Rele	ase paramete	rs
Fraction ww from applicator	F _{applicator,ww}	-	1
Fraction ww during cleaning	Fww	-	1
Cleaning efficiency for floor and treated surfaces		-	0.25
Emission to waste water from air		Kg/d	negligible
Emission to waste water from applicator (8)	E _{applicator} , ww	kg/d	5.78 x 10 ⁻⁷
Emission to waste water from floor and treated surfaces (9)	E _{treated,ww}	kg/d	7.78 × 10 ⁻⁶
Emissions to ww (Eapplicator, ww + Etreated surface, ww) (10)	Eww	Kg/d	8.35 x 10 ⁻⁴

Simultaneity factor (3-11 applications)	Fsimultaneity	%	0.815
Number of treated houses	Nhouses		4000

Table 7: Total local emissions to waste water resulting from a cracks and crevices treatment

Compartment	Local emission (Elocal waste water, total) [kg/d] (11)
STP	
Fsim=0.81%	2.72 x 10 ⁻⁴

Major change application

Emission Estimation for Scenario 1 - private houses

The estimations of environmental emissions are based on crack and crevices treatment approach. For emission calculations the following formulas (ESD for PT18 products, July 2008) were used to calculate daily local emission to STP (as STP is regarded as the only pathway of direct alpha-cypermethrin emissions after indoor use of Fendona):

Mixing/loading step

- (1) $E_{prep,air} = Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,air} \times 10^{-3}$
- (2) $E_{prep,applicator} = Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,applicator} \times 10^{-3}$
- (3) $E_{prep,floor} = Q_{prod,prep} \times F_{AI} \times N_{prep,building} \times F_{prep,floor} \times 10^{-3}$

Application step

- (4) $E_{application,air} = N_{appl,building} \times F_{appl,air} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (5) $E_{application,applicator} = N_{appl,building} \times F_{appl,applicator} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (6) $E_{application,floor} = N_{appl,building} \times F_{appl,floor} \times Q_{prod} \times F_{AI} \times AREA_{treated}$
- (7) $E_{application,treated} = N_{appl,building} \times F_{appl,treated} \times Q_{prod} \times F_{AI} \times AREA_{treated}$

Releases to wastewater and STP

- (8) $E_{applicator,ww} = (E_{prep,applicator} + E_{appl.,applicator}) \times F_{applicator,ww}$
- (9) $E_{treated,ww} = (E_{prep,floor} + E_{appl.,floor} + E_{appl.,treated}) \times F_{ww} \times F_{CE}$
- (10) $E_{waste\ water} = E_{applicator,ww} + E_{treated,ww}$
- (11) $Elocal_{waste\ water,total} = ((Elocal_{waste\ water} \times N_{houses}) \times F_{simultaneity}$

The input parameter used for the environmental exposure assessment for urban pest control in cracks and crevices in private houses are shown in Table 5. The following assumptions have been made:

- Number of applications per day per building (Nappl,building) is 1 for the use in private houses.
- Number of preparations per day per building is (Nprep,building) is 1 for private houses
- Fraction emitted to floor during mixing/loading (F_{prep,floor}) was set to 1.0E-03 for amateurs, assuming 1L containers as worst case with unspecific design

- Fraction emitted to floor during application (F_{application,floor}) was set to 0.124 for trigger spray
- Fraction emitted to applicator during application (Fapplication applicator) was set to 6E-03 for trigger spray
- Fraction emitted to waste waters by the applicator during the cleaning step: Fapplicator
 www. is equal to 1 as 100% of the coveralls are considered washable;
- Fraction emitted to waste waters during the cleaning step: F_{ww}. is equal to 1 as 100% of the treated surfaces are washed with water;
- Cleaning efficiency for the cracks and crevices treatment: FcE is 0.25 (ESD PT 18, Table 3.3-8, p.64);
- Simultaneity factor, F_{simultaneity}, represents the percentage of houses which are treated simultaneously (ESD PT18, p. 38-40). Calculations were made with the default F_{sim} of 0.815%, representing a frequency of use of 3 to 11 applications per year for the initial dossier. Additionally, as risk mitigation measure (RMM) a reduced Fsim of 0.204%, representing a frequency of use of 1 to 2 applications per year, is applied.

The values to calculate daily local emission to STP after cracks and crevices application at a dose rate of 16 mg a.i./m² are summarised in the immediate table below. The resulting total local emissions to the waste water are summarized in the subsequent table, calculated with the formula (11).

Calculation of the local emissions to waste water – Scenario 1: Indoor crack and crevice treatment by non-professional users. Application – dose rate 16 mg a.i./m²:

Input	Symbol	Unit	Private houses
Amount of active substance	<mark>Qai</mark>	Kg/m ²	1.60×10^{-5}
Fraction of active		_	
substance in the	F _{AI}		<mark>0.0158</mark>
commercial product			
		ading stage	
Area treated/wet rooms	AREA _{treated}	m²	<mark>2</mark>
Fraction emitted to air	F _{prep,air}		0
during preparation step	r prep,air	_	U
Fraction emitted to		_	
applicator during	F _{prep,applicator}	<u>-</u>	1.2×10 ⁻³
preparation step			
Fraction emitted to floor	F _{prep,floor}	_	1.0×10^{-3}
during preparation step	r prep, noor	<u>-</u>	1.0×10
Quantity of commercial			
product used for the	Qprod,prep	g	<mark>20.46</mark>
preparation per day			
Number of preparations per	$N_{prep,building}$	d ⁻¹	1
uay	i Tpi ep, building	<u>u</u>	-
Emission to the air	_		_
	E _{prep,air}	kg/d	<u>0</u>
(1)			
Emission to the	_		
applicator during	E _{prep,applicator}	<mark>kg/d</mark>	3.88×10 ⁻⁷
preparation step (2)			
Emission to floor during	Eprep,floor	<mark>kg/d</mark>	3.23×10 ⁻⁷
preparation step (3)	_p. 5p/55.		

Application						
Fraction emitted to air						
during application	аррисации, ан	<u></u>	0.02			
Fraction emitted to	_	_	C 0. 40.3			
applicator during	Fapplication, applicator	<mark>-</mark>	6.0×10^{-3}			
application						
Fraction emitted to floor	Fapplication,floor	<mark>-</mark>	<mark>0.124</mark>			
during application Fraction emitted to treated						
surfaces during application	Fapplication, treated	<mark>-</mark>	<mark>0.85</mark>			
Number of application per			_			
day per building	$N_{\text{application,building}}$	<mark>d⁻¹</mark>	<u>1</u>			
Quantity of commercial						
product applied	<mark>Qprod</mark>	<mark>kg/m²</mark>	1.023×10 ⁻³			
Emission to the air						
during application step	Eapplication,air	<mark>kg/d</mark>	6.47×10 ⁻⁷			
(4)						
Emission to the						
applicator during	Eapplication, applicator	<mark>kg/d</mark>	1.94×10^{-7}			
application step (5)						
Emission to floor during	E _{application,floor}	<mark>kg/d</mark>	4.01×10^{-6}			
application step (6)	- аррисацопуноог					
Emission to treated	_		2.75 40-5			
surfaces during	Eapplication, treated	<mark>kg/d</mark>	2.75×10^{-5}			
application (7)	Cleaning and Rele	ase narame	ters			
Cleaning and Release parameters						
rraction ww from			<u></u>			
Fraction ww from applicator	F _{applicator,ww}	-	1			
<mark>applicator</mark>	Fapplicator,ww	•	_			
		-	1			
applicator Fraction ww during	F _{applicator} ,ww		1			
applicator Fraction ww during cleaning	F _{applicator,ww}	• •	_			
applicator Fraction ww during cleaning Cleaning efficiency for floor	Fapplicator,ww Fww FCE		0.25			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air	Fapplicator,ww Fww FCE Eair, ww	- - - Kg/d	1			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water	Fapplicator,ww Fww FCE Eair, ww	Kg/d	1 0.25 negligible			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8)	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww		0.25			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww	Kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww	Kg/d	1 0.25 negligible			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9)	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww	Kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww Etreated,ww	Kg/d kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷ 7.95 × 10 ⁻⁶			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww (Eapplicator, ww + Etreated	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww	Kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww (Eapplicator, ww + Etreated surface, ww) (10)	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww Etreated,ww	Kg/d kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷ 7.95 × 10 ⁻⁶			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww (Eapplicator, ww + Etreated surface, ww) (10) Simultaneity factor	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww Etreated,ww Eww	Kg/d kg/d Kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷ 7.95 × 10 ⁻⁶ 8.53 x 10 ⁻⁶			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww (Eapplicator, ww + Etreated surface, ww) (10) Simultaneity factor (3-11 applications) / (1-2)	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww Etreated,ww	Kg/d kg/d kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷ 7.95 × 10 ⁻⁶			
applicator Fraction ww during cleaning Cleaning efficiency for floor and treated surfaces Emission to waste water from air Emission to waste water from applicator (8) Emission to waste water from floor and treated surfaces (9) Emissions to ww (Eapplicator, ww + Etreated surface, ww) (10) Simultaneity factor	Fapplicator,ww Fww FCE Eair, ww Eapplicator, ww Etreated,ww Eww	Kg/d kg/d Kg/d	1 0.25 negligible 5.82 x 10 ⁻⁷ 7.95 × 10 ⁻⁶ 8.53 x 10 ⁻⁶			

Total local emissions to waste water resulting from a cracks and crevices treatment:

Compartment	Local emission (Elocal waste water, total) [kg/d] (11)
STP	

Fsim=0.204%	<mark>6.96e-5</mark>

PEC calculations for Scenario 1

In this section, Predicted Environmental Concentrations (PEC) for the active substance, alpha-cypermethrin, are calculated for the influent (Clocal $_{inf}$) and effluent (Clocal $_{eff}$ = PEC $_{STP}$) of a sewage treatment plant (STP) and for the environmental compartments surface water (PEC $_{surface\ water}$) and sediment (PEC $_{sediment}$). In addition to that, the concentration in STP sludge (C $_{sludge}$) and the PEC for the active substance in soil after one year and ten years of sludge application (PEC $_{soil}$, PEC $_{soil10}$) are calculated. PEC $_{groundwater}$ was regarded as the concentration in soil porewater following sludge application. PEC $_{air}$ is considered negligible, as alpha-cypermethrin is not considered as volatile.

PEC in aquatic compartment (STP, surface water, sediment and groundwater)

Insecticides applied indoor will eventually be cleaned. This cleaning step will therefore lead to release to waste water generally through wet cleaning methods. Therefore, the sewage treatment plant (STP) is considered as one of the main "receiving compartment" where insecticides will be released through wet cleaning events. In Europe, estimates of potential exposures resulting from STPs are carried out according to the standard calculation frameworks presented in the Technical Guidance Document (E.C., 2003). Then, the "final" environmental compartment will logically be the surface water, the sediment, the groundwater (through STP), the soil (from sludge application) and air. Releases into the environment are split in three steps: mixing loading step, application step and cleaning step.

PEC for Sewage Treatment Plant (PEC_{STP})

Local emission rates to waste water (Elocal_{water}) for cracks and crevices applications were calculated. For the risk assessment, a population of 10,000 inhabitants per public STP is taken as a typical example for rural populations where sewage water treatment plants are located. The public sewage treatment plant effluent discharge rate (EFFLUENT_{stp}) based on an averaged wastewater flow of 200L per capita per day for a population of 10,000 inhabitants is 2,000,000 L/d (EFFLUENT_{stp}) corresponding to the guidance document (TGD, Part B, Table 9).

The influent concentration in a sewage treatment plant, Clocal_{inf}, is then calculated with the following equation, according to (TGD, Part B, Eq.32)

$$C \qquad l_{i} p = \frac{E}{E} \frac{l_{w}o}{F} l^{a} \times k_{e}^{6}$$

Where:

Clocal_{inf} = concentration in untreated water (mg l⁻¹)

EFFLUENT_{stp} = $(2 \times 10^6 \text{ L d}^{-1}; \text{ default})$

Elocal_{water} = local emission to wastewater during episode (kg d⁻¹)

With Clocal_{inf}, we are able next to calculate the STP effluent concentrations (Clocal_{eff}) by the equation (according to TGD, Part B, Eq.33):

 $Clocal_{eff} = Clocal_{inf} \times Fstp_{water}$

To calculate Clocal_{eff}, the fraction of the emission to wastewater directed to effluent (Fstp_{water}) was estimated at a value of 16% by ECA, using the EUSES. A negligible fraction (5,74 10^{-3} %) of the active substance is directed to air, while assuming no biodegradability, 84 % of the active substance will be directed to sludge by STP. Results are presented in the table below.

Table 8. Calculated fate and distribution in the STP (emission fractions given by EUSES).

Compartment	Percentage [%]
F _{STP,air}	5.74×10 ⁻³
F _{STP,water}	16
F _{STP} ,sludge	84
F _{STP} ,degraded	0

The parameter Clocal_{eff} can also be regarded as the **PEC**_{STP} of alpha-cypermethrin (TGD, Part B, Eq. 38),

PECSTP = Clocaleff

which represents the worst-case concentration the micro-organisms in the sewage treatment plant are exposed to. The Clocal_{eff} is calculated in Table 9.

Table 9: Calculation of the STP effluent concentration (Clocal_{eff} = PEC_{STP})

Influent concentration in untreated waste water [mg/L]	Clocal _{inf}	Fsim=0.81% 1.36×10 ⁻⁴	Fsim=0.2% 3.34×10^{-5}
Fraction of emission directed to water by STP [-]	Fstp _{water}	0.16	
Effluent concentration in untreated waste water [mg/L]	Clocal _{eff} = PEC _{STP}	= Fsim=0.81% 2.18E-05	

Major change application

To calculate Clocal_{eff}, the fraction of the emission to wastewater directed to effluent (Fstp_{water}) was estimated at a value of 15% by the SimpleTreat model v4. A negligible fraction of the active substance is directed to air, while assuming no biodegradability, 85% of the active substance will be directed to sludge by STP. Results are presented in the following table.

Calculated fate and distribution in the STP (based on Simple Treat v.4):

Compartment	Percentage [%]
F _{STP,air}	0
F _{STP,water}	<mark>15</mark>
F _{STP,sludge}	<mark>85</mark>
F _{STP,degraded}	0

The parameter Clocal_{eff} can also be regarded as the **PEC**_{STP} of alpha-cypermethrin (TGD, Part B, Eq. 38),

PECSTP = Clocaleff

which represents the worst-case concentration the micro-organisms in the sewage treatment plant are exposed to. The Clocal_{eff} is calculated in the table below.

Calculation of the STP effluent concentration (Clocaleff = PEC_{STP}):

Effluent concentration in untreated waste water [mg/L]	Clocal _{eff} = PEC _{STP}	5.2e-6
Fraction of emission directed to water by STP	Fstp _{water}	0.15
Influent concentration in untreated waste water [mg/L]	<u>Clocal_{inf}</u>	$\frac{\text{Fsim} = 0.204\%}{3.48 \times 10^{-5}}$

PEC for surface water (PEC_{surface water})

The indoor use pattern of Fendona does not allow for direct exposure to surface waters, only the potential for indirect exposure via an STP. The local concentration arising from the indirect emission to a watercourse via the STP during the proposed use of this product was calculated to take into account dilution and removal to suspended sediments (ECHA guidance on ERA).

The solid-water partition coefficient in suspended matter (Kp_{susp}) can be calculated from the Koc value and the fraction of organic carbon in the compartment (Foc_{susp}) (according to Eq. 23 of TGD Part B), presenting in Table 10. The fraction of organic carbon in suspended soils is set as default value at 0.1 kg/kg (following the Table 5 of the TGD for Risk Assessment).

Table 10: Calculation of	partition	coefficient	solid-water	in suspended matter

Parameter	Symbol	Value
Weight fraction organic carbon in suspended soils [kgorganic carbon/kgsolid]	FoC _{susp}	0.1
Partition coefficient organic carbon-water [L/kg]	Koc	76344
Partition coefficient solid-water in suspended matter [L/kg]	Kp _{susp} = Foc _{susp} × K _{oc}	7634.4

The resulting Kp_{susp} is then used to calculate the local concentration in surface water (Clocal_{water}) and so the **PEClocal**_{water} by the equation that follows (TGD Part B, Eq. 45).

$$C \qquad = \frac{C}{(1+K)^{\frac{e}{s}}} \underbrace{\frac{C}{(1+K)^{\frac{e}{s}}} \underbrace{\frac{C}{(1+K)^{\frac{e}{s}}}}$$

The concentration of suspended matter (dry weight) in river (SUSP_{water}) and DILUTION are default values, according to the TGD for Risk Assessment (Part B). Input parameters and the calculated $Clocal_{water} = PEClocal_{water}$ are presented in the table below:

Table 11: Calculation of local concentration in surface water (Clocal_{water} = PEClocal_{water}).

Parameter	Symbol	Value
Partition coefficient solid-water in suspended matter [L/kg]	Kp _{susp}	7634.4
Effluent concentration in untreated waste water [mg/L]	Clocal _{eff}	1.93 × 10 ⁻⁵
Concentration of suspended matter (dry weight) [mg _{solid} l _{water} -1]	SUSP _{water}	15
Dilution factor	DILUTION	10
Local concentration of alpha- cypermethrin in surface water during emission episode [mg/L]	Clocal _{water} = PEClocal _{water}	Fsim=0.81% 1.95E-06

Major change application

Calculation of local concentration in surface water (Clocalwater = PEClocalwater):

Parameter	Symbol	Value
Partition coefficient solid-water in suspended matter [L/kg]	Kp _{susp}	<mark>7634.4</mark>
Effluent concentration in untreated waste water [mg/L]	Clocal eff	5.2× 10 ⁻⁶
Concentration of suspended matter (dry weight) [mg _{solid} l _{water} -1]	SUSPwater	<mark>15</mark>
Dilution factor	DILUTION	10
Local concentration of alpha-cypermethrin in surface water during emission episode [mg/L]	Clocal _{water} = PEClocal _{water}	Fsim = 0.204% 4.67e-7

PEC for Sediment (PEClocal_{sed})

To assess the Predicted Environmental Concentration in sediment (PEClocal_{sed}), wet bulk density of suspended matter (RHO_{susp}) and the suspended matter-water partitioning coefficient ($K_{susp-water}$) are calculated below.

The wet bulk density of suspended matter (RHO_{susp}) is calculated in Table 12 according to TGD for Risk Assessment (Part B, Eq. 18). Fsolid_{susp}, RHO_{solid}, Fwater_{susp}, and RHO_{water} are default values of TGD (Part B, Table 5).

 $RHO_{susp} = Fsolid_{susp} \times RHO_{solid} + Fwater_{susp} \times RHO_{water}$

Table 12: Calculation of wet bulk density of suspended matter, RHO_{susp}

Parameter	Symbol	Value
Fraction solids in suspended matter [m³/m³]	Fsolid _{susp}	0.1
Bulk density of the solid phase [kg/m³]	sity of the solid phase [kg/m³] RHO _{solid} 2	
Fraction water in suspended matter [kg/m³]	Fwater _{susp}	0.9
Density of the water phase [kg/m³]	RHO _{water}	1000
Bulk density of wet suspended matter [kg/m³]	RHO _{susp}	1150

The suspended matter-water partitioning coefficient ($K_{susp-water}$) is next calculated (Eq. 24 of TGD Part B).

 $K_{susp-water} = Fwater_{susp} + Fsolid_{susp} \times Kp_{susp}/1000 \times RHO_{solid}$

According to the TGD for Risk Assessment (Part B, Table 5), default values for Fwater_{susp}, Fsolid_{susp} and for RHO_{solid} are used for the calculation of $\mathbf{K}_{\text{susp-water}}$, presenting below in Table 13, with the value for Kp_{susp} as previously calculated in Table 10.

Table 13: Calculation of suspended matter-water partitioning coefficient, Ksusp-water

Parameter	Symbol	Value
Fraction water in suspended matter [m³/m³]	Fwater _{susp}	0.9
Fraction solids in suspended matter [m³/m³]	Fsolid _{susp}	0.1
Partition coefficient solid-water in suspended matter [L/kg]	Kp _{susp}	7634.4
Density of the solid phase [kg/m³]	RHO _{solid}	2500
Suspended matter-water partitioning coefficient [m³/m³]	K _{susp-water}	1910

The concentration in freshly deposited sediment is taken as the PEC for sediment. Hence, the PEClocal for sediment is calculated by the following equation (TGD Part B, Eq. 50). Results are shown in Table 14.

$$P \qquad sE = \frac{K - w s}{{}^{d}R} C + W s + U P \qquad oO \qquad E C \times a^{r} Q$$

Table 14: Calculation of PEClocal for sediment, PEClocalsed

Parameter	Symbol	Val	ue
Suspended matter-water partitioning coefficient [m³/m³]	K _{susp-water}	1910	
Local concentration of alpha-cypermethrin in surface water during emission episode [mg/L]	Clocal _{water} =PEClocal _{water}	Fsim=0.81% 1.95E-06	Fsim=0.2% 4.79E-07
Density of the solid phase [kg/m³]	RHO _{susp}	1150	
Local concentration of alpha cypermethrin on sediment during emission episode [mg/kg]	PEClocal _{sed}	Fsim=0.81% 3.24E-03	

Major change application

Calculation of PEClocal for sediment, PEClocalsed:

Parameter Parame	Symbol	Value
Suspended matter-water partitioning coefficient [m³/m³]	K _{susp-water}	<mark>1910</mark>
Local concentration of alpha-cypermethrin in surface water during emission episode [mg/L]	Clocal _{water} =PEClocal _{water}	4.67E-07
Density of the solid phase [kg/m³]	RHO _{susp}	1150
Local concentration of alpha cypermethrin on sediment during emission episode [mg/kg]	PEClocal _{sed}	Fsim=0.204% 7.75E-04

> PEC for groundwater <u>PEC_{groundwater}</u> (via the application of sludge to agricultural land

The **BE CA** considers that there is very low exposure to groundwater due to use pattern (indoor use). Risk to groundwater is via sewage sludge application on soil. Based on reliable adsorption/desorption data, it can be concluded that alpha-cypermethrin is strongly adsorbed by soil components (mean Koc = 76344 L/kg). Therefore, PEC_{groundwater} can be regarded as the concentration in soil porewater following sludge application, PEClocal soil, porewater (calculated by the Eq. 67 of the TGD for Risk Assessment, Part B).

> PEC in atmosphere compartment (PEC_{air})

Based on the vapour pressure (5.6 \times 10⁻⁷ Pa at 25°C) and the Henry's constant (0.069 Pa \times m³/mol at 25°C), volatilisation of alpha-cypermethrin is negligible. Calculations of the chemical lifetime in the troposphere (document II-A section 4.2.2.1) resulted in a half-life of 3.47 hours (QSAR estimates). According to this results ($t_{1/2}$ < 2 days), alpha-cypermethrin

is rapidly degraded by photochemical processes and no accumulation of alpha-cypermethrin in the air is to be expected. The calculation of PEC_{air} is therefore of no relevance.

PEC in terrestrial compartment (PECsoil)

Exposure of the soil compartment as a result of the indoor crack and crevice use of alphacypermethrin can be considered as coming indirectly via the application of sewage sludge to land. Therefore, for the assessment of the soil compartment, concentration of alphacypermethrin in the STP sludge and its concentration in soil during the first year and after ten years of sludge application were thoroughly calculated.

The concentration of active substance in dry sewage sludge can be calculated using the equations below taken from the ECHA guidance (Eq. 36 and 37, Part B) on ERA plus default parameters presented in the same guidance document:

$$C_{s-l} = \frac{F_{s} \cdot s \times \mathbb{E}_{d} \cdot p_{g} \cdot l_{e} \cdot o_{a}^{s} \cdot 1 \cdot {}_{t}^{6} \zeta_{l}}{d \cdot g \cdot S^{e} \cdot L \cdot U \cdot D}$$

where, $SLUDGERATE = 2/3 \times SUSPCONC_{inf} \times EFFLUENT_{stp} + SURPLUS_{sludge} \times CAPACITY_{stp}$

and: $EFFLUENT_{stp} = CAPACITY_{stp} \times WASTEW_{inhab}$

The rate of sludge application, *SLUDGERATE*, is calculated without considering anaerobic degradation in the STP. According to the TGD for Risk Assessment (Part B, Table 9), default values for SUSPCONC_{inf}, for SURPLUS_{sludge} and for CAPACITY_{stp} are used for the calculation, as presented in Table 15 below.

Table 15: Calculation of the rate of sewage sludge production in the STP (SLUDGERATE)

Parameter	Symbol	Value
Concentration of suspended matter in STP influent [kg/m³]	SUSPCONCinf	0.45
Effluent discharge rate of STP [m³/d]	EFFLUENT _{stp}	2000
Surplus sludge per inhabitant equivalent [kg/d \times eq]	SURPLUS _{sludge}	0.011
Capacity of the STP [eq]	CAPACITY _{stp}	10 000
Rate of sewage sludge production [kg/d]	SLUDGERATE	710

Using SLUDGERATE value, the concentration in dry sewage sludge (C_{sludge}) was then calculated. The fraction of the emission directed to sludge by STP (Fstp_{sludge}) is set 84%, according to EUSES. Results are presented in Table 16 below.

Table 16: Calculation of the STP sludge concentration (Csludge)

Parameter	Symbol	Value
-----------	--------	-------

Concentration in dry sewage sludge [mg/kg]	Csludge	Fsim=0.81% 3.22E-01
Fraction of emission directed to sludge by STP	Fstp _{sludge}	0.84
Rate of sewage sludge production [kg/d]	SLUDGERATE	710
Local emission rate to waste water during episode [kg/d]	Elocalwater	Fsim=0.81% 2.72E-04

Major change application

Calculation of the rate of sewage sludge production in the STP (SLUDGERATE)

Parameter Parame	Symbol	Value
Concentration of suspended matter in STP influent [kg/m³]	SUSPCONC _{inf}	0.45
Effluent discharge rate of STP [m³/d]	EFFLUENT _{stp}	<mark>2000</mark>
Surplus sludge per inhabitant equivalent $[kg/d \times eq]$	SURPLUS _{sludge}	0.019
Capacity of the STP [eq]	CAPACITY _{stp}	10 000
Rate of sewage sludge production [kg/d]	SLUDGERATE	<mark>790</mark>

Using SLUDGERATE value, the concentration in dry sewage sludge (C_{sludge}) was then calculated. The fraction of the emission directed to sludge by STP (Fstp_{sludge}) is set 85%, according to Simple Treat v.4. Results are presented in the table below.

Calculation of the STP sludge concentration (Csludge):

Parameter	Symbol	Value
Local emission rate to waste water during episode [kg/d]	Elocalwater	Fsim=0.204% 6.96E-05
Rate of sewage sludge production [kg/d]	SLUDGERATE	<mark>790</mark>
Fraction of emission directed to sludge by STP	Fstp _{sludge}	0.85
Concentration in dry sewage sludge [mg/kg]	Csludge	Fsim=0.204% 7.49-02

Next, the concentration in soil just after the first sludge application, Csludge soil (0), and the fraction accumulation in one year, Facc, are calculated. Results are shown in Table 17 and 18, respectively. The initial soil concentration after ten applications of sludge, Csludge_{soil} $_{10}$ (0), is also assessed (Table 19).

For Csludge soil 1 (0) calculation (TGD, Part B, Eq. 60), default values for APPLsludge and DEPTHsoil are used (TGD, Part B, Table 11), as well as for bulk density of soil (RHOsoil) (TGD, Part B, Eq. 18, Table 5).

 $PEC_{soil} = Csludge_{soil 1}(0) = C_{sludge} \times APPL_{sludge} / DEPTH_{soil} \times RHO_{soil}$

Table 17: Calculation of the concentration in soil due to sludge in first year (**Csludge**_{soil 1} **(0)**).

Parameter	Symbol	Value
raiailletei	Syllibol	Value
Dry sludge application rate [kg/m² y]	$APPL_{sludge}$	0.5
Concentration in dry sewage sludge [mg/kg]	Csludge	0.28
Mixing depth of soil [m]	DEPTH _{soil}	0.2
Bulk density of soil [kg/m³]	RHO _{soil}	1700
Concentration in soil due to sludge in first year at t = 0 [mg/kg]	Csludge soil 1 (0) = PECsoil	Fsim=0.81% 4.74E-04

Major change application

Calculation of the concentration in soil due to sludge in first year (Csludgesoil 1 (0)):

Parameter	Symbol	Value
Dry sludge application rate [kg/m² y]	APPL _{sludge}	0.5
Concentration in dry sewage sludge [mg/kg]	- C _{sludge}	Fsim = 0.204% 0.0749
Mixing depth of soil [m]	DEPTH _{soil}	0.2
Bulk density of soil [kg/m³]	RHO _{soil}	<mark>1700</mark>
Concentration in soil due to sludge in first year at t = 0 [mg/kg]	Csludge soil 1 (0) = PECsoil	Fsim=0.204% 1.10E-04

These values can also be regarded as the PEC_{soil} values of alpha-cypermethrin, which represent the concentration soil organisms are exposed to just after the first year of sludge application. The fraction of the substance that remains in the topsoil layer (20 cm) at the end of a year is given by Table 18. For the calculation of the k-rate (taking biodegradation in soil into account), according to Eq. 56 & 29 of TGD, PART B, a maximum DT50 field value in soil of 112 days is considered.

$$\mathbf{k} = k_{\text{volat}} + k_{\text{leach}} + k_{\text{bio soil}}$$
, where k_{volat} and $k_{\text{leach}} \sim 0$, thus $\mathbf{k} = \mathbf{k}_{\text{bio soil}}$

kbio soil = In 2 / DT50 bio soil, where DT50 bio soil is set to 112 days.

Table 18: Calculation of the fraction accumulation in one year (Facc)

Parameter	Symbol	Value
First order rate constant for removal from top soil [d-1]	k	0.0062
Fraction accumulation in one year [-]	Facc = e ^{-365 k}	0.104

The resulting fraction accumulation in one year is 0.104. The results obtained in Table 17 and Table 18 are used for the calculation in Table 19 to ascertain the concentration after ten years of sludge application (immediately after the tenth application) with the following equation (Eq. 62 of TGD, Part B).

Csludge_{soil 10} (0) = Csludge_{soil 1}(0) × $[1+\Sigma^{9}_{n=1} \text{ Facc}^{n}]$

Table 19: Calculation of initial concentration after ten applications of sludge (PEC_{soil 10})

Parameter	Symbol	Value
Concentration in soil due to sludge after ten applications (mg/kg)	Csludge _{soil 10} (0) = PEC _{soil 10}	Fsim=0.81% 5.23E-04

Major change application

Calculation of initial concentration after ten applications of sludge (PECsoil 10):

Parameter Parame	Symbol	Value
Concentration in soil due to sludge after ten applications (mg/kg)	Csludge _{soil 10} (0) = PEC _{soil}	Fsim=0.204% 1.23E-04

The parameter Csludge_{soil 10} (0) (= $C_{soil 10}$ (0)), (deposition via air can be excluded) can also be regarded as the PEC_{soil 10} of alpha-cypermethrin which represents the concentration soil organisms are exposed to after ten applications of sludge (immediately after the tenth application). A PEC time-weight average soil (PEC_{twa soil}) was also calculated after the tenth application of sludge over 30 and 180 days. Results are summarized in Table 20.

Table 20: Calculation of time-weight average concentration on 30 days and 180 days after ten applications of sludge (C_{soil 10} (180)).

Parameter	Symbol	Value
Concentration (30 d) in soil due to sludge after ten applications (mg/kg)	C _{soil} 10 (30)	Fsim=0.81% 4.97E-04
Concentration (180 d) in soil due to sludge after ten applications (mg/kg)	Csoil 10 (180)	Fsim=0.81% 4.09×10 ⁻⁴

Major change application

Calculation of time-weight average concentration on 30 days and 180 days after ten applications of sludge (Csoil 10 (180)):

Parameter	Symbol	Value
Concentration (30 d) in soil due to sludge after ten applications (mg/kg)	C _{soil 10} (30)	Fsim=0.204% 1.12E-04
Concentration (180 d) in soil due to sludge after ten applications (mg/kg)	C _{soil 10} (180)	Fsim=0.204% 7.42E-05

> PEC in soil porewater (PEClocal_{soil}, porewater))

Soil porewater is an important factor. The concentration of alpha-cypermethrin in soil porewater ($C_{porewater} = PEClocal_{soil, porewater}$) is outlined in Table 23, with the aid of the results of Table 21 & Table 22. Predicted environmental concentration in porewater is calculated according to Eq. 67 of the guidance document. The calculation, shown below, is very simplistic, takes no account of soil characterisation and neglects consideration of transformation plus dilution in deeper soil layers. Whilst noted as being a simplistic approach, these values represent concentrations in porewater of non-specific "agricultural soil" significantly below the current quality standard set at 0.1 μ g l⁻¹ by the EU Drinking Water Directive (98/83/EC).

$$PEClocal_{soil, porewater} = \frac{PEClocal_{soil} \times RHO_{soil}}{K_{soil-water} \times 1000}$$

PEClocal_{soil} is the highest predicted environmental concentration in agricultural soil (arable soil mg kg_{wwt}-1). Thus, as an input, the PEClocal _{soil} after 10 consecutive sludge applications considering biodegradation over a period of 180 days after the last sludge application event is used. The bulk density of wet soil, RHO_{soil}, is taken as a default value of 1700 kg m⁻³ (TGD, Part B, Table 5). K_{soil-water} is the soil-water partitioning co-efficient, calculated using the Eq. 24 of TGD, Part B.

 $K_{soil-water} = Fair_{soil} \times K_{air-water} + Fwater_{soil} + Fsolid_{soil} \times Kp_{soil} / 1000 \times RHO_{solid}$

With the default values from TGD as inputs, shown in the following tables 22 & 23), the airwater partitioning coefficient and the partition coefficient solid-water in soil were calculated. Both parameters are used to derive $K_{\text{soil-water}}$ (Eq. 24).

Table 21: Calculation of air-water partitioning coefficient (Kair-water)

Parameter	Symbol	Value
Henry's law constant [Pa \times m ³ /mol]	HENRY	0.069
Gas constant [Pa \times m ³ /mol \times k]	R	8.314
Temperature at the air water interface [K]	TEMP	285
Air-water partitioning coefficient [-]	K _{air-water} = HENRY / (R × TEMP) (Eq. 22, TGD)	2.91 × 10 ⁻⁵

Table 22: Calculation of partition coefficient solid-water in soil (K_{soil-water})

Parameter	Symbol	Value
Weight fraction organic carbon in soil [kg/kg]	Foc _{soil}	0.02
Partition coefficient organic carbon- water [L/kg]	Кос	76344
Partition coefficient solid-water in soil [L/kg]	$Kp_{soil} = Foc_{soil} \times Koc$ (Eq. 23, TGD)	1526.9
Fraction air in soil [m³/m³]	Fair _{soil}	0.2
Air-water partitioning coefficient [-]	K _{air-water}	2.91 × 10 ⁻⁵
Fraction water in soil [m³/m³]	Fwater _{soil}	0.2
Fraction solids in soil [m³/m³]	Fsolid _{soil}	0.6
Density of the solid phase [kg/m³]	RHO _{solid}	2500
Soil-water partitioning coefficient [m³/m³]	K _{soil-water}	2290.5

• The resulting soil-water partitioning coefficient amounts to 2290.5 m³/m³.

Finally, the concentration of alpha-cypermethrin in soil porewater (PEClocal_{soil,porewater}) is calculated in Table 23, taking into account: (a) the Csludge_{soil10} (180) concentration (as calculated in Table 20), (b) the soil-water partitioning coefficient of 2290.5 m³/m³ and (c) the bulk density of soil, RHO_{soil}, of 1700 kg/m³ (TGD, Part B, Eq. 18).

Table 23: Calculation of the concentration in soil porewater

Parameter	Symbol	Value
Predicted Environmental Concentration in soil [mg/kg]	PEClocal _{soil} = Csludge _{soil10} (180)	Fsim=0.81% 4.09×10 ⁻⁴
Soil-water partitioning coefficient [m³/m³]	$K_{soil ext{-water}}$	2290.5
Bulk density of soil [kg/m³]	RHO _{soil}	1700
Predicted Environmental Concentration in porewater [mg/L]	PEC local soil, porewater	Fsim=0.81% 3.04×10 ⁻⁷

Major change application

Calculation of the concentration in soil porewater:

Parameter	Symbol	Value
Predicted Environmental Concentration in soil [mg/kg]	PEClocal _{soil} = Csludge _{soil10} (180)	Fsim=0.204% 7.42×10 ⁻⁵
Soil-water partitioning coefficient [m³/m³]	K _{soil-water}	2290.5
Bulk density of soil [kg/m³]	RHO _{soil}	<mark>1700</mark>
Predicted Environmental Concentration in porewater [mg/L]	PEC local soil,porewater	Fsim=0.204% 5.5×10 ⁻⁸

Summary of PEC values

A summary of all derived PEC values is outlined in Table 24.

Table 24: Summary of PEC values of alpha-cypermethrin in all exposed environmental compartments.

PEC	Value
	Fsim=0.81%
PEC _{STP} [mg/L]	2.18E-05
PEC _{surface water} [mg/L]	1.95E-06
PEC _{sediment} [mg/kg wwt]	3.24E-03
PEC _{soil, 1} (0) * [mg/kg]	4.74E-04
PEC _{soil, 10} (0) ** [mg/kg]	5.23E-04
PEC _{soil, 10} (30) # [mg/kg]	4.97E-04
PEC _{soil, 10} (180) ## [mg/kg]	4.09E-04
PEC _{soil,porewater} [mg/L]	3.04E-07
PECair	negligible

^{* =} immediately after the first application = Csludgesoil (0)

Major change application

Summary of PEC values of alpha-cypermethrin in all exposed environmental compartments:

PEC	Value
	Fsim=0.204%
PEC _{STP} [mg/L]	5.2E-06
PEC _{surface water} [mg/L]	4.67E-07
PEC _{sediment} [mg/kg wwt]	7.75E-04
PEC _{soil} , 1 (0) * [mg/kg]	1.1E-04
PEC _{soil, 10} (0) ** [mg/kg]	1.23E-04
PEC _{soil, 10} (30) # [mg/kg]	1.12E-04

^{** =} immediately after the tenth application = Csludgesoil 10 (0)

^{# =} average concentration over 30 days after the tenth application = Csludgesoil 10 (30)

^{## =}average concentration over 180 days after the tenth application = Csludgesoil 10 (180)

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PEC _{soil, 10} (180) ## [mg/kg]	7.42E-05
PEC _{soil,porewater} [mg/L]	5.50E-08
PEC air	negligible

^{* =} immediately after the first application = Csludgesoil (0)

** = immediately after the tenth application = Csludgesoil 10 (0)

= average concentration over 30 days after the tenth application = Csludgesoil 10 (30)

=average concentration over 180 days after the tenth application = Csludgesoil 10 (180)

SCENARIO 2 - Professional & non-professional use in rural hygiene (animal houses/shelters)

Fendona 1.5 SC is a water-based concentrate containing 15 g alpha-cypermethrin per litre, corresponding to 1.58 % (w/w) active substance (TGAI). There are two possible use concentrations and hence two possible dilutions; Low rate of 1:50 (2.0% v/v), as well as high rate of 1:25 (4.0% v/v). 1 litres of spray dilution should be applied to a surface of 20 $\rm m^2$, resulting in a maximum active substance concentration of 32 mg a.i. per $\rm m^2$ treated area for the high rate application. The environmental exposure and risk assessment is carried out with this higher value, which represents the worst case.

Fendona 1.5 SC is intended to be used in rural hygiene applications indoors in animal houses/shelters by spraying at low pressure. It is used by professionals and non-professionals.

It is intended to be used in the animal categories (i1=1-7, 9,10, 13-15) according to the ESD for Insecticides for Stables and Manure Storage Systems in PT18 (2006).

In the following table the 18 different animal subcategories and manure storage types are presented. These different categories are referenced with the appropriate number.

Cat-Subcat (Nb)	Animal subcategory and manure storage type
1	Dairy cow
2	Beef
3	Veal Calf
4	Sow, individual pens
5	Sows in groups
6	Fattening pig
7	Laying hen, battery cages without treatment
9	Laying hen, battery cages with forced drying
10	Laying hen, compact battery cages
13	Laying hen, free range with grating floor
14	parent broiler >18 weeks, free range with grating floor
15	parent broiler in rearing, free range with grating floor

The following input parameters were used to calculate the local emissions to soil.

Table 25. Input parameter for calculating the loca	ıl emission – sc	enario 2
Scenario: Rural hygiene; professional and non-prohouses/shelters	ofessional use i	n animal
Content of substance in formulation	1.58	% w/v
Amount of b.p. (concentrate) prescribed to be used for area specified for application	2.04	g/m²
Active substance concentration per treated m ²	32	mg/m²
Insecticide application interval Tbioc-int	*	d
Number of applications Napp-bioc	*	-

The route of exposure of alpha-cypermethrin to the environment from pest control in animal housings is mainly via application of manure/slurry to arable land and grassland. Releases from the facility drain to STP and subsequent compartments are also possible for animal categories i1= 8, 11, 12, 16, 17 and 18. The primary receiving compartment hereby is the STP and subsequently exposed compartments are surface water, sediment, soil and groundwater (via sludge application) as well as biota. However, the waste water route for categories 8, 11, 12, 16, 17 and 18 was not considered further for the risk assessment as the product must not be used in stables/animal housings connected to a sewage treatment plant.

 In the following table, the compartments which are exposed from the use of alphacypermethrin in rural hygiene (animal houses/shelters) by professionals and nonprofessionals are given:

Table 26. Identification of relevant receiving compartments based on the exposure pathway – scenario 2 *									
	Fresh- water	Freshwater sediment	Sea- water	Seawater sediment	STP	Air	Soil	Ground- water	Other
Scenario 2	Yes*	Yes*	No	No	No**	n.a.	Yes*	Yes*	-

^{*} Exposure can occur via the route usage in animal houses/shelters \rightarrow application of slurry/manure to soil \rightarrow runoff to surface water / leaching to groundwater.

^{**} In some animal categories, STP are directly exposed. However, for Fendona 1.5 SC this route was not considered further for the risk assessment as the product must not be used in stables/animal housings connected to a sewage treatment plant.

Emission Estimation for Scenario 2

The input parameter used for the environmental exposure assessment for professional and non-professional use in rural hygiene (stables *i.e.* animal houses/shelters) is taken from the ESD for Insecticides for Stables and Manure Storage Systems in PT18 (OECD ESD No. 14) and the Technical Agreement for Biocides TAB (ENV86). Additional calculations were performed according to the Guidance on the biocidal products regulation. Volume IV Environment - Part B Risk Assessment (active substances) (BPR, ECHA, 2015b), as well as from output values given by EUSES.

Default values regarding e.g. number of animals, the fractions of a.i. released to the relevant streams, number of insecticide applications etc. were directly used in accordance with the ESD for PT18 (2006) and associated documents. There were no deviations from the defaults given in the ESD for PT 18. The treated area in the stables, which is used for calculations, is the total area of the housing (floor, walls and ceiling) plus the slatted areas and other areas, taken the worst case scenario.

Calculations were done for i1 = 1-7, 9, 10, 13-15 animal sub-categories and for i2 = 2 (Insecticide (adulticide) against other insects or arthropods (blood sucking pests). The mode of application was spraying (i3 = 1) and the exposure streams considered were i4 = 1 (manure) and i4 = 3 (slurry).

Predicted environmental concentrations (PECs) were estimated for the terrestrial compartment, including groundwater and for the aquatic compartment (incl. sediment) due to run-off from soil. The estimation of PECs is based on the emissions from animal housings due to slurry/manure applications on arable land and grassland. This assessment was carried out according to maximum nitrogen or phosphate immission limits (Europe).

According to the Technical Agreement for Biocides TAB (ENV 86), it was decided to use the nitrogen immission standards from the EC Nitrates Directive (91/676/EC) of 170 kg N ha⁻¹ yr⁻¹ for all soils (arable land and grassland).

The calculations of the releases of alpha-cypermethrin during slurry/manure applications are accomplished for all animal categories and sub-categories according to PT 18, ESD No. 14. For soil, the calculation of initial environmental concentrations (**PIECs**) assumes application of slurry/manure onto arable and grassland soils without taking biodegradation of alpha-cypermethrin into account in the first instance. The predicted soil concentration, after 10 years of consecutive manure/slurry applications, $PIEC_{10_degr}$, is used as the PECsoil in risk assessment, considering the worst case scenario (according to the WG(V) November, 2015 for risk assessment, after the calculation corrections for PIECsoil_grassland after 10 years, agreed at the WG-I-2018, January 2018).

In accordance with the guidance presented in the TGD, Part B, for the groundwater risk assessment, the concentration in porewater is used for the initial groundwater assessment. The PEC in porewater ($PEC_{ground\ water}$) was calculated considering degaradation processes in soil after 10 concecutive years of manure application, i.e., $PIEC_{10degr}$ was used as an input for soil concentration (in line with the WG(V) November, 2015 for risk assessment) using TGD equations for equilibrium partitioning.

PEC_{surface water} and **PEC**_{sediment} were calculated for the route of exposure of alphacypermethrin via slurry/manure to soil and subsequent run-off to surface water (incl. sediment). PEC_{surface water} was derived by diluting the PEC_{groundwater} by a factor of 10 (OECD ESD No. 14). PEC_{sediment} was calculated according to equation (50) of the Guidance on BPR IV/B (2015) using default parameter as given in Table 5 of the guidance document together with the Koc of 76344 L/kg to calculate a bulk density of suspended matter (RHO_{susp}) of 1150 kg/m³ and a suspended matter-water partitioning coefficient ($K_{susp-water}$) of 1910 m³/m³.

Definitions of all input parameters, intermediate output values and the corresponding equations are given below for the animal categories (1-7, 9, 10, 13-15) and biocide type, i2=2, bloodsucking pests.

Input	<u>Symbol</u>	<u>Value</u>	<u>Unit</u>
Default area of the housing for application (total area)	AREA _{i1}	var.	[m²]
Content of a.i. in formulation	<u>Fbioc</u>	6.27	<u>%</u>
Area to be treated with amount prescribed for application	AREAui _{i1}	1	[m²]
Amount of diluted product prescribed to be used for area specified for application	Qprod-uins _{i1,i2,i3}	0.51	[g]
Fraction of active ingredient released to the relevant stream	Fi1,i2,i3,i4	var.	[-]
Insecticide application interval	Tbioc-int	var.	[d]
Maximum number of insecticide applications	Napp-bioc	var.	[-]
Number of land applications for arable land	Napp-arab	1	[-]
Number of land applications for grassland	Napp-grass	4	[-]
Manure storage time arable land in new scenario	Tmanure-int _{ar2}	212	[d]
Land application interval for grassland	<u>Tgr-int</u>	<u>53</u>	[d]
Number of animals in housing for every relevant category i1	<u>N_{i1}</u>	var.	[-]
Amount of phosphate per animal for every relevant category i1	Qphosph _{i1}	var.	[kg/d]
Amount of nitrogen per animal for every relevant category i1	Qnitrog _{i1}	var.	[kg/d]
Phosphate immission standard for one year on grassland	QP2O5,grassland	110	[kg/ha]
Phosphate immission standard for one year on arable land	QP2O5,arable_land	<u>85</u>	[kg/ha]
Nitrogen immission standard for one year on grassland	QN,grassland	170	[kg/ha]

Input	<u>Symbol</u>	<u>Value</u>	Unit
Nitrogen immission standard for one year on arable land	QN,arable_land	170	[kg/ha]
Mixing depth with soil for grassland	DEPTH _{grassland}	0.05	[m]
Mixing depth with soil for arable land	DEPTH _{arable land}	0.20	[m]
Density of wet bulk soil	RHOsoilwet	1700	[kg/m³]
Half-life for biodegradation in bulk soil		112	[d]
Number of land applications for arable land in 10 years	Napp _{arab,10}	10	[-]
Land application interval for arable land	Tar ₂ -int	<u>365</u>	[d]
Interval between last (of four) manure application and the first application of a new series		365 (WGI2018 E NV 7-7)	[d]
Fraction air in soil	<u>Fair</u>	0.2	[-]
Fraction water in soil	Fwater _{soil}	0.2	[-]
Fraction solid in soil	Fsolid _{soil}	0.6	[-]
Bulk density of solids	RHOsolid	2500	[kg/m³]
<u>Gas constant</u>	R	8.314	[Pa*m³/(mol*K)]
Temperature at the air-water interface	Temp air-wat	285	[K]
Dilution factor for run-off water into surface water	Dilution _{run-off}	10	-
Bulk density of suspended matter	RHOsusp	1150	[kg/m³]
Fraction water in suspended matter	Fwater _{susp}	0.9	[-]
Fraction solid in suspended matter	Fsolid _{susp}	0.1	[-]

Intermediate output	<u>Symbol</u>	<u>Value</u>	<u>Unit</u>
Amount of a.s. to be used in housing storage for one application	Qai-prescr _{i1,i2,i3}	var.	[kg]
Amount of a.s. in relevant stream i4 after one application	Qai _{i1,i2,i3,i4}	var.	[kg]
Number of biocide applications during manure storage period for application on grassland	Napp-manure _{gr}	var.	[-]
Number of biocide applications during manure storage period for application on arable land	Napp-biomanure ar2	var.	[-]
Amount of a.i. in manure/slurry after the relevant number of biocide applications for the manure application to grassland	Qai-grass _{i1,i2,i3,i4}	var.	[kg]
Amount of a.i. in manure/slurry after the relevant number of biocide applications for the manure application to arable land	Qai-arab _{i1,i2,i3,i4}	var.	[kg]
Amount of P ₂ O ₅ produced during the relevant period for every relevant (sub)category of animal/housing i1 for grassland	Qphosph-grass _{i1,4}	var.	[kg/yr]
Amount of P ₂ O ₅ produced during the relevant period for every relevant (sub)category of animal/housing i1 for arable land	Qphosph-arab i1,i4	var.	[kg/yr]
Amount of N produced during the relevant period for every relevant (sub)category of animal/housing i1 for grassland	Qnitrog-grass _{i1,4}	var.	[kg/yr]
Amount of N produced during the relevant period for every relevant (sub)category of animal/housing i1 for arable land	Qnitrog-arab i1,i4	var.	[kg/yr]

Amount of active ingredient to be used in housing or manure for one application:

 $Qai - prescr_{il,i2,i3} = 10^{-5} * Qprod - uins_{il,i2,i3} * Fbioc * AREA_{il}/AREAui_{il}$ Eq. 1

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Amount of active ingredient in relevant stream after one application:

$$Q_{i_1i_1i_2i_3} q = F_i i_{i_1i_2i_3} * Q - p \ a \ r_{i_1} i_{i_2}$$

Eq. 2

Number of biocide applications during the manure storage period:

For arable land:

If Tbioc-int ≥ Tmanure-int_{ar2}, then

$$N = a - bp \quad ipo_{a \quad na \quad 2br} = 1_e$$

Eq. 3

If Tbioc-int < Tmanure-int_{ar2}, then

$$N - b_m \quad a \neq R \quad op \quad [n] \partial p \quad p_r \quad T_e i_a \quad Un \quad m \quad T_e i_2 \quad t_r \quad nN n \not D a l$$

$$p [n] \partial Q$$

$$T - i \quad Un \quad m \quad i$$

 $R \ O \ U \ [n] D \ with n=1$ is the sign for rounding off to a whole number with 1 decimal

If Napp-bio_{manure_ar2} > Napp-bioc

$$N - db _{m} p i _{ad} p_{ur} = N _{e} - db _{I}$$

Eq. 5

> For grassland:

If Tbioc-int ≥ Tgr-int, then

$$N \quad a-pn \quad p \quad a \quad n=1$$

Eq. 6

If Tbioc-int < Tgr-int, then

$$N - m \qquad a_{\alpha} = R_{\alpha} a p$$

$$N - m = a_p = R_r a p$$
 $\left[n \partial p (p - iT u iU - igr tn w) + 1 \right]$

Eq. 7

 $R \ O \ U \ Nn$ with n=1 is the sign for rounding off to a whole number with 1 decimal

If Napp-manure_{gr} > Napp-bioc

$$N$$
 -am p q $p = N$ u ab r p

Eq. 8

Amount of active ingredient which goes to manure or slurry for grassland:

$$Q - g = a_1 r_{123} \neq Q_{111} s_3 *a Ns -im a$$

Eq. 9

Amount of active ingredient which goes to manure or slurry for arable land:

$$Q - a \qquad a_i \, f_{23} = iQ \quad i_i \, i_i \, b_i \, b_i \, a_i \qquad -ib \quad q_i \quad i_{ai}$$

Eq. 10

Amount of phosphate and nitrogen in manure produced during the relevant period:

$$Q - \mathbf{g} \qquad {}_{i} {}_{i} \mathbf{p}_{\overline{i}} N_{i} \alpha^{*}_{i} \mathbf{Q} \qquad s \ s \ {}_{i} \mathbf{p}_{\overline{i}} \mathbf{p} \qquad - \mathbf{h} \ \mathbf{k} \mathbf{g}$$
 Eq. 11

$$Q - a p_{i} {}_{i} \mathcal{F}_{i} \mathcal{H}_{i} *_{l} \mathcal{Q} \quad o \quad b_{i} *_{p} \mathcal{T} \quad p \ h + m i \quad a h i$$
 Eq. 12

$$Q - g n + i \eta = N \rho *_{i} Q \quad so \quad \text{if } g - i i g$$
 Eq. 13

$$Q -a n_{i i} + N_i + Q r b + M gim i t_a r$$
 Eq. 14

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	Animal category (i1)								
<u>Parameter</u>	1	2	3	<u>4</u>	<u>5</u>	<u>6</u>	<u>Z</u>	9	
N _{i1} [-]	100	125	80	132	132	400	21000	21000	
Qphosph _{i1} [kg/d]	0.0405	0.0286	0.0142	0.0557	0.0557	0.0203	0.0012	0.0011	
Qnitrog _{i1} [kg/d]	0.1432	0.1286	0.0238	0.0711	0.0711	0.0304	0.0020	0.0018	
AREA _{i1} [m ²]	3230	1750	<u>650</u>	1930	2200	2020	3210	3210	1
Qai-prescr _{i1,i2,i3} [kg]	0.097	0.052	0.019	0.058	0.066	0.061	0.096	0.096	
Qnitrog-grass _{i1,4} [kg/yr]	758.7	852.2	101	497	497	645	2248	2015	
Qnitrog-arab i1,i4 [kg/yr]	5225.3	5868.7	<u>695</u>	3424	3424	4443	1583	13874	1
Qphosph-grass _{i1,4} [kg/yr]	214.8	189.7	60	389	389	431	1358	1235	
Qphosph-arab i1,i4 [kg/yr]	1479.3	1306.2	415.2	2681.7	2682	2682	2968	8508	
<u>Parameter</u>	10	13	14	<u>15</u>					
N _{i1} [-]	21000	20000	7000	9000					
Qphosph _{i1} [kg/d]	0.0011	0.0011	0.0019	0.0008					
Qnitrog _{i1} [kg/d]	0.0018	0.0017	0.003	0.0014					
AREA _{i1} [m ²]	3210	3392	1290	1640					
Qai-prescr _{i1,i2,i3} [kg]	0.096	0.102	0.039	0.049					
Qnitrog-grass _{i1,4} [kg/yr]	2015	1813	1106	<u>653</u>					
Qnitrog-arab i1,i4 [kg/yr]	13874	12483	7614	4500					
Qphosph-grass _{i1,4} [kg/yr]	1235	1177	697	367					
Qphosph-arab i1,i4 [kg/yr]	8508	4051	4818	8103	4803	<u>2529</u>	<u>8395</u>	<u>5986</u>	8395

> Input parameters and intermediate output for calculating the local emission to soil (relevant for biocide type i2=2; bloodsucking pests)

	Animal category (i1)								
<u>Parameter</u>	1	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	9	
F _{i1,i2,i3} (i4=manure/slurry) [-]	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	
Tbioc-int [-]	28	28	28	28	28	28	91	91	
Napp-bioc [-]	<u>6</u>	6	<u>6</u>	<u>6</u>	<u>6</u>	<u>6</u>	4	4	
Qai _{i1,i2,i3,i4} [kg]	0.05	0.03	0.01	0.03	0.03	0.03	0.05	0.05	
Napp-manure _{gr} [-]	1.9	1.9	1.9	1.9	1.9	1.9	1.0	1.0	
Napp-bio _{manure ar2} [-]	6.0	6.0	6.0	6.0	6.0	6.0	2.3	2.3	
Qai-grass _{i1,i2,i3,i4} [kg]	0.0921	0.0499	0.0185	0.0550	0.0627	0.0576	0.0482	0.0482	
Qai-arab _{i1,i2,i3,i4} [kg]	0.2907	0.1575	0.0585	0.1737	0.1980	0.1818	0.1107	0.1107	
<u>Parameter</u>	10	13	14	<u>15</u>					
_{i1,i2,i3} (i4=manure/slurry) [-]	0.5	0.5	0.5	0.5					
「bioc-int [-]	91	91	91	91					
Napp-bioc [-]	4	4	4	4					
Qai _{i1,i2,i3,i4} [kg]	0.05	0.05	0.02	0.02					
Napp-manure _{gr} [-]	1.0	1.0	1.0	1.0					
Napp-bio _{manure ar2} [-]	2.3	2.3	2.3	2.3					

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Qai-grass _{i1,i2,i3,i4} [kg]	0.0482	0.0509	0.0194	0.0246			
Qai-arab _{i1,i2,i3,i4} [kg]	0.1107	0.1170	0.0445	0.0566			

PEC calculations for Scenario 2:

The definitions of all relevant PEC values and the corresponding equations are presented below.

Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for phosphate and land application on grassland – after one application and no degradation	PIECgrs-	var.	[mg/kg _{ww}]
Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for phosphate and land application on arable land		var.	[mg/kg _{ww}]
Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for nitrogen and land application on grassland – after one application and no degradation	PIECgrs-N _{i1,i2,i3,i4}	var.	[mg/kg _{ww}]
Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for nitrogen and land application on arable land	PIECarab-N _{i1,i2,i3,i4}	var.	[mg/kg _{ww}]
First order rate constant for degradation in bulk soil	kdeg _{soil}	6.2E-03	[1/d]
Fraction of active remaining in grassland soil after the last manure spreading event	<u>Fsoil_{grs}</u>	<u>2.61</u>	[-]
Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for phosphate and land application on grassland – after the last of four manure application and degradation assumed	DIFCars/ dear-	var.	[mg/kg _{ww}]
Initial concentration of the biocide (a.s.) in soil in the case of an immission standard for nitrogen and land application on grassland – after the last of four manure	PIFCars4 dear-	var.	[mg/kg _{ww}]

application and degradation assumed			
Fraction of active remaining in arable soil after 10 year of manure application	FSOilarab 10	1.12	[-]
Fraction of active remaining in grassland soil, 365 d after the first (of four) manure spreading events	Fs0il _{grs2}	0.28	[-]
Soil-water equilibrium partition coefficient	Ksoil-water	<u>2290.5</u>	[m³/m³]
Air-water partitioning coefficient	Kair-water	2.91E-05	[m ³ /m ³]
Suspended-water equilibrium partition coefficient	Ksusp-water	1910	[m³/m³]
Initial concentration in grassland soil (after the last of four manure applications per year), after 10 years of manure application, taking degradation into account; based on phosphate immission standard	PIECgrs _{10 degr} - P ₂ O _{511,i2,i3,i4}	var.	[mg/kg _{ww}]
Initial concentration in soil of arable land after 10 years of manure application, taking degradation into account; based on phosphate immission standard	PIECarab _{10 degr} - P ₂ O _{511,i2,i3,i4}	var.	[mg/kg _{ww}]

Initial concentration in grassland soil			
(after the last of four manure	PIECgrs _{10 degr} - Ni1,i2,i3,i4	<u>var.</u>	[mg/kg _{ww}]
Initial concentration in soil of arable land after 10 years of manure application, taking degradation into account; based on nitrogen immission standard	PIECarab _{10 deg} r-Ni1,i2,i3,i4	var.	[mg/kg _{ww}]
Porewater/groundwater concentrations; grassland, based on phosphate immission standard	PIECgrs-gw- P2O5i1,i2,i3,i4	var.	[mg/L]

Porewater/groundwater concentrations; arable land, based on phosphate immission standard	PIECarab-gw- P ₂ O _{5i1,i2,i3,i4}	<u>var.</u>	[mg/L]
Porewater/groundwater concentrations; grassland, based on nitrogen immission standard	PIECgrs-gw- Ni1,i2,i3,i4	var.	[mg/L]
Porewater/groundwater concentrations; arable land, based on nitrogen immission standard	PIECarab-gw- N _{i1,i2,i3,i4}	var.	[mg/L]
Surface water concentrations; grassland, based on phosphate immission standard	PIECgrs-sw- P2O5i1,i2,i3,i4	var.	[mg/L]
Surface water concentrations; arable land, based on phosphate immission standard	PIECarab-sw- P ₂ O _{5i1,i2,i3,i4}	var.	[mg/L]
Surface water concentrations; grassland, based on nitrogen immission standard	PIECgrs-sw- N _{i1,i2,i3,i4}	var.	[mg/L]
Surface water concentrations; arable land, based on nitrogen immission standard	PIECarab-sw- N _{i1,i2,i3,i4}	var.	[mg/L]
Sediment concentrations; grassland, based on phosphate immission standard	PIECgrs-sed- P ₂ O _{5i1,i2,i3,i4}	var.	[mg/kg _{ww}]
Sediment concentrations; arable land, based on phosphate immission standard	PIECarab- sed- P2O5i1,i2,i3,i4	var.	[mg/kg _{ww}]
Sediment concentrations; grassland, based on nitrogen immission standard	PIECgrs-sed- N _{i1,i2,i3,i4}	var.	[mg/kg _{ww}]
Sediment concentrations; arable land, based on nitrogen immission standard		<u>var.</u>	[mg/kg _{ww}]

Concentration of the active ingredient in soil based on phosphorous or nitrogen immission standards for both grassland and arable land (one manure application):

Eq. 15

Eq. 16

$$P - N_{i} I_{i} I_{i} = \frac{1}{3} \frac{*Q - g0}{Q} + \frac{1}{3} \frac{*Q}{Q} - \frac{1}{3} \frac{i}{3} \frac{i}{2} - \frac{1}{3} \frac{i}{3} \frac{i}{2} - \frac{1}{3} \frac{i}{3} \frac{i}{3} - \frac{1}{3} \frac{i}{3} \frac{i$$

Eq. 17

P
$$-N_i I_{i} = \frac{1 + Q - a \cdot 0}{Q} + \frac{1}{Q} + \frac{Q}{Q} + \frac{Q}{Q}$$

Eq. 18

Rate constant for biodegradation in soil:

$$k \, d \, _{s} e_{o} = g_{l} \, n \, (2 \, b)_{s} \, i_{o}$$
 Eq. 19

<u>Fraction of active remaining in grassland soil after the last (of four) manure spreading event:</u>

$$Fs \quad \varrho = \frac{I - \left(1 - \frac{k}{e^{-s}} \frac{k^{q} T_{i} e^{jg} \mathbf{S}}{1 - e^{-k} \frac{d}{e^{-k}} \frac{k^{q} T_{i} e^{jg} \mathbf{S}}{1 - e^{-k} \frac{d}{e^{-k}} \frac{k^{q} T_{i} e^{jg} \mathbf{S}}{1 - e^{-k}}\right)}$$
 Eq. 20

Concentration of the active ingredient in soil based on phosphorous or nitrogen immission standards for both grassland after the last (of four) manure application event, taking degradation into account.

$$P \qquad \qquad PE \ g_{i \ i \ i \ l \ i \ 2} = PP_{i \ i \ i \ l} = PP_{i \ i$$

Fraction of active remaining in arable soil after 10 year of manure application:

$$Fs = {}_{a}o_{-1} = \frac{i}{a} \frac{1 - (-e^{-k_{s} * \# r - i e a \ln s})^{k \cdot 0} - e^{-k_{s} * \# r - i e a \ln s})^{k \cdot 0}}{1 - e^{-k_{s} * \# r - i e a \ln r \cdot 0}},$$
 Eq. 23

<u>Fraction of active remaining in grassland soil, 365 d after the first (of four) manure spreading events:</u>

Fs
$$Q_{2r} \neq el^{k_s d_o^* T \varrho_r \neq g \eta_r} e^{-ig \eta_r} e^{-ig \eta_r}$$
 Eq. 24

Calculation of the air-water partitioning coefficient:

$$K - w a = H r / R \not \in \mathcal{E}$$
 $n \underline{r} \cdot \boldsymbol{e} - r w \dot{n}$) Eq. 25

<u>Calculation of the soil-water partitioning coefficient:</u>

$$K - w = Fs * K a - ow a + Ft ai sieatlF_o nw_s r_i * R_{ol} s e_i * aK_l dH/n! t Eq.26$$

Calculation of the suspended matter-water partitioning coefficient:

$$K - w = F$$
 us $s + lw$ st $s = e^*_p R s a r o^*_p R H ell$ Eq. 27

Concentration of the active ingredient in soil based on phosphorous or nitrogen immission standards for both grassland and arable land, after the last of four manure applications per year, after 10 consecutive years, taking degradation into account (equation corrected in the case of grassland, as agreed at the WG-I-2018, January)

$$PIEC_{grs10_degr}-P2O5i_{1,i2,13,14}=PIEC_{grs4_degr}-P2O5i_{1,i2,i3,i4}*1-Fsoil_{grs}^{10}/1-Fsoil_{grs}$$
 Eq.28
$$P = \frac{1}{1} I - _{0}P E_{\underline{i} \ i \ i \ li \ 2} \frac{1}{6} \frac{2}{4}P \cdot C_{e} \quad \text{gO-P} \quad _{r}a_{i} E_{i \ li \ 2} \frac{2}{5} \frac{2}{4}P \cdot C_{e} \quad \text{gO-P} \quad _{r}a_{i} E_{i \ li \ 2} \frac{2}{5} \frac{2}{4}P \cdot C_{e} \quad \text{gO-P} \quad _{r}a_{i} E_{i \ li \ 2} \frac{2}{5} \frac{2}{4}P \cdot C_{e} \quad \text{gO-P} \quad _{r}a_{i} E_{i \ li \ 2} \frac{2}{5} \frac{2}{4}P \cdot C_{e} \quad _{g}A_{i} E_{i \ 2} \frac{2}{5} \frac{2}{5} P_{i \ li \ 2} \frac{2}{5} \frac{2}{4}P \cdot C_{e} \quad _{g}A_{i} E_{i \ 2} \frac{2}{5} \frac{2}{5} P_{i \ li \ 2} \frac{2}{5$$

Concentrations in porewater/groundwater, derived from the concentrations in soil, after one manure application for arable and four manure application events for grassland, not taken degradation into account (applicable to both immission standards)

$$P - -Ig \quad E \stackrel{P}{w} \stackrel{C}{K}_{s \to ow} \stackrel{i}{\underset{i}{\downarrow}} \stackrel{*}{\underset{1}{\downarrow}} 1 \stackrel{e}{\underset{1}{\downarrow}} 0_{r}$$
 Eq. 32

Concentrations in surface water (applicable to both immission standards as well as grassland and arable land):

$$P - \mathbf{d} = \mathbf{H} P - \mathbf{d} E w \quad C V_{r-d} P$$
 Eq. 33

> Concentrations in sediment (applicable to both immission standards as well as grassland and arable land):

- ✓ For biocide type i2=2; bloodsucking pests
- > Initial concentration of alpha cypermethrin in soil, degradation NOT taken into account

[mg/kg _{ww}]	Animal Ca	tegory (i1)						
	1	2	3	4	<u>5</u>	<u>6</u>	<u>7</u>	9
IECarab- l _{i1,i2,i3,i4}	2.96E-03	1.43E-03	4.4825E-03	2.70E-03	3.08E-03	2.18E-03	3.8119E-04	4.25E-04
IECarab- 205i1,i2,i3,i4	5.24E-03	3.21E-03	3.7543E-03	1.72E-03	1.97E-03	1.63E-03	3.16E-04	3.47E-04
	10	13	14	<u>15</u>				
PIECarab- N _{i1,i2,i3,i4}	4.25E-04	4.99E-04	3.11E-04	6.70E-04				
PIECarab- P ₂ O _{5i1,i2,i3,i4}	3.47E-04	3.85E-04	2.47E-04	5.96E-04				

PEC in soil for grassland after 1 manure application event, (i2=2: bloodsucking pests)											
	1	2	<u>3</u>	4	<u>5</u>	<u>6</u>	<u>7</u>	9			
PIECgrs4- N _{i1,i2,i3,i4}	2.59E-02	1.25E-02	3.91E-02	2.36E-02	2.69E-02	1.90E-02	4.57E-03	5.10E-03			

PIECgrs4- P2O5i1,i2,i3,i4	5.91E-02	3.63E-02	4.24E-02	1.95E-02	2.22E-02	1.84E-02	4.89E-03	5.38E-03	
	10	<u>13</u>	14	<u>15</u>					
PIECgrs4- N _{i1,i2,i3,i4}	5.10E-03	5.98E-03	3.73E-03	8.02E-03					
PIECgrs4- P2O5i1,i2,i3,i4	5.38E-03	5.96E-03	3.83E-03	9.24E-03					

> Considering degradation processes of alpha cypermethrin in soil, after 1-year application, taking degradation into account.

	PEC in soil for arable land after 1 manure application event, taking degradation into account (i2=2: bloodsucking pests)											
[mg/kgww] Animal Category (i1)												
	1	2	3	4	<u>5</u>	<u>6</u>	<u>Z</u>	9				
PECarab _{1 degr} - N _{i1,i2,i3,i4}	2.96E-03	1.43E-03	4.48E-03	2.70E-03	3.08E-03	2.18E-03	3.81E-04	4.25E-04				
PECarab _{1 degr} - P ₂ O _{5i1,i2,i3,i4}	5.24E-03	3.21E-03	3.75E-03	1.73E-03	1.96E-03	1.63E-03	3.15E-04	3.47E-04				
	10	13	14	<u>15</u>								
PECarab _{1 degr} - N _{i1,i2,i3,i4}	4.25E-04	4.99E-04	3.11E-04	6.70E-04								

PECarab _{1_degr} -					7	I	ĺ	l i	I	
	3.47E-04	3.85E-04	2.47E-04	5.96E-04						
PEC in soil for	grassland a	fter 1 manu	re applicat	ion event, t	aking degra	adation into	account			
(i2=2 : bloodsucking pests)										
	1	2	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>9</u>		
PECgrs4_degr- Ni1,i2,i3,i4	1.69E-02	8.15E-03	2.55E-02	1.54E-02	1.76E-02	1.24E-02	2.98E-03	3.33E-03		
PECgrs4_degr- P2O5i1,i2,i3,i4	3.86E-02	2.37E-02	2.77E-02	1.27E-02	1.45E-02	1.20E-02	3.20E-03	3.51E-03		
	10	<u>13</u>	14	<u>15</u>						
PECgrs4degr- Ni1,i2,i3,i4	3.33E-03	3.91E-03	2.44E-03	5.24E-03						
PECgrs4_degr- P ₂ O _{5i1,i2,i3,i4}	3.51E-03	3.90E-03	2.50E-03	6.04E-03						

> Considering degradation processes of alpha cypermethrin in soil, after 10 consecutive years application

PEC in soil for	PEC in soil for arable land, 1 manure application/yr. after 10 consecutive years, taking degradation into account								
(i2=2: bloodsucking pests)									
[mg/kgww]	Animal	Category (i <u>1)</u>						
	1	2	<u>3</u>	4	<u>5</u>	<u>6</u>	<u>Z</u>	9	

PECarab _{10_degr} - N _{i1,i2,i3,i4}	3.31E-03	1.59E-03	5.00E-03	3.01E-03	3.44E-03	2.43E-03	4.25E-04	4.75E-04	
PECarab _{10 degr} - P ₂ O _{5i1,i2,i3,i4}	5.84E-03	3.59E-03	4.19E-03	1.92E-03	2.18E-03	1.82E-03	3.52E-04	3.87E-04	
	10	13	14	<u>15</u>					
PECarab _{10 degr} - N _{i1,i2,i3,i4}	4.75E-04	5.58E-04	3.48E-04	7.48E-04					
PECarab _{10 degr} - P ₂ O _{5i1,i2,i3,i4}	3.87E-04	4.30E-04	2.76E-04	6.65E-04					
PEC in soil for grassland, 1 manure application/yr. after 10 consecutive years, taking degradation into account									
(i2=2 : bloodsucking pests)									
-			(i2=2	2 : bloodsuc	king pests	<u> </u>			
	1	2	(i2=2	2 : bloodsuc	<u>5</u>	<u>6</u>	Z	9	
PECgrs _{10 degr-} Ni1,i2,i3,i4	1.89E-02	9.10E-03		•			Z 3.33E-03	9 3.72E-03	
			<u>3</u>	4	<u>5</u>	6			
Ni1,i2,i3,i4 PECgrs _{10 degr} -	1.89E-02	9.10E-03	2.85E-02	1.72E-02	5 1.96E-02	6 1.39E-02	3.33E-03	3.72E-03	
Ni1,i2,i3,i4 PECgrs _{10 degr} -	1.89E-02 4.31E-02	9.10E-03 2.65E-02	2.85E-02 3.09E-02	1.72E-02 1.42E-02	5 1.96E-02	6 1.39E-02	3.33E-03	3.72E-03	

• Predicted Environmental Concentrations of alpha cypermethrin in groundwater (using PECsoil, after 10 coscecutive years manure application, PEC_{10 degr}, WG V, 2015, November & WG-I-2018, January)

[mg/L]	Animal Category (i1)								
	1	2	<u>3</u>	4	<u>5</u>	<u>6</u>	<u>7</u>	<u>9</u>	
PECgrs _{10 degr} - gw-N _{i1,i2,i3,i4}	1.40E-05	6.76E-06	2.12E-05	1.28E-05	1.46E-05	1.03E-05	2.47E-06	2.76E-06	
PECgrs _{10 degr} - gw- P ₂ O _{5i1,i2,i3,i4}	3.20E-05	1.96E-05	2.29E-05	1.06E-05	1.2E-05	9.98E-06	2.65E-06	2.91E-06	
PECars _{10 degr} - gw-N _{i1,i2,i3,i4}	2.46E-06	1.19E-06	3.71E-06	2.24E-06	2.55E-06	1.81E-06	3.16E-07	3.53E-07	
PECars _{10 degr} - gw- P ₂ O _{5i1,i2,i3,i4}	4.34E-06	2.66E-06	3.11E-06	1.43E-06	1.63E-06	1.35E-06	2.62E-07	2.87E-07	
	10	13	14	<u>15</u>					
PECgrs _{10 degr} - gw-N _{i1,i2,i3,i4}	2.76E-06	3.24E-06	2.02E-06	4.35E-06					
PECgrs _{10 degr} - gw- P ₂ O _{5i1,i2,i3,i4}	2.91E-06	3.23E-06	2.07E-06	5E-06					
PECars _{10 degr} - gw-N _{i1,i2,i3,i4}	3.53E-07	4.14E-07	2.58E-07	5.55E-07					
PECars _{10 degr} - gw-P ₂ O _{5i1,i2,i3,i4}	2.87E-07	3.19E-07	2.05E-07	4.94E-07					

• These values represent concentrations in porewater significantly below the current quality standard set at 0.1 µg l⁻¹ by the EU Drinking Water Directive (98/83/EC).

> <u>Predicted Environmental Concentrations of alpha cypermethrin in surface water (PECsoil, after 10 coscecutive years manure application, PEC_{10 degr} as an input)</u>

[mg/L]	Animal Ca	Animal Category (i1)								
	1	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	9		
PECgrs-sw-N _{i1,i2,i3,i4}	1.4E-06	6.76E-07	2.12E-06	1.28E-06	1.46E-06	1.03E-06	2.47E-07	2.76E-07		
PECgrs-sw- P ₂ O _{5i1,i2,i3,i4}	3.2E-06	1.96E-06	2.29E-06	1.06E-06	1.2E-06	9.98E-07	2.65E-07	2.91E-07		
PECars-sw-N _{i1,i2,i3,i4}	2.46E-07	1.19E-07	3.71E-07	2.24E-07	2.55E-07	1.81E-07	3.16E-08	3.53E-08		
PECars-sw- P ₂ O _{5i1,i2,i3,i4}	4.34E-07	2.66E-07	3.11E-07	1.43E-07	1.63E-07	1.35E-07	2.62E-08	2.87E-08		
	10	13	14	<u>15</u>						
PECgrs-sw-N _{i1,i2,i3,i4}	2.76E-07	3.24E-07	2.02E-07	4.35E-07						
PECgrs-sw- P2O511,12,13,14	2.91E-07	3.23E-07	2.07E-07	5E-07						
PECars-sw-N _{i1,i2,i3,i4}	3.53E-08	4.14E-08	2.58E-08	5.55E-08						
PECars-sw- P ₂ O _{5i1,i2,i3,i4}	2.87E-08	3.19E-08	2.05E-08	4.94E-08						

> Predicted Environmental Concentrations of alpha cypermethrin in sediment (PECsoil, after 10 coscecutive years manure application, PEC_{10 degr} as an input)

PEC in sediment	PEC in sediment for arable and grassland (i2=2: bloodsucking pests)								
[mg/kgww]	Animal Category (i1)								
	1	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>Z</u>	9	
PECgrs-sed- N _{i1,i2,i3,i4}	2.33E-03	1.12E-03	3.52E-03	2.12E-03	2.42E-03	1.71E-03	4.11E-04	4.58E-04	
PECgrs-sed- P ₂ O _{5i1,i2,i3,i4}	5.32E-03	3.26E-03	3.81E-03	1.75E-03	2.00E-03	1.66E-03	4.40E-04	4.83E-04	
PECars-sed- N _{i1,i2,i3,i4}	4.08E-04	1.97E-04	6.17E-04	3.72E-04	4.24E-04	3.00E-04	5.25E-05	5.86E-05	
PECars-sed- P ₂ O _{5i1,i2,i3,i4}	7.21E-04	4.42E-04	5.17E-04	2.38E-04	2.71E-04	2.25E-04	4.34E-05	4.77E-05	
	10	13	14	<u>15</u>					
PECgrs-sed- N _{i1,i2,i3,i4}	4.58E-04	5.38E-04	3.36E-04	7.22E-04					
PECgrs-sed- P ₂ O _{5i1,i2,i3,i4}	4.83E-04	5.36E-04	3.44E-04	8.31E-04					
PECars-sed- N _{i1,i2,i3,i4}	5.86E-05	6.88E-05	4.29E-05	9.22E-05					
PECars-sed- P ₂ O _{5i1,i2,i3,i4}	4.77E-05	5.30E-05	3.40E-05	8.21E-05					

Primary and secondary poisoning

Primary poisoning

Primary poisoning is not relevant for the foreseen use of Fendona 1.5 SC.

Secondary poisoning for Scenario 1

Alpha- cypermethrin has a potential for bioaccumulation in aquatic and terrestrial non-target organisms (log $K_{\rm OW}$ 5.5). Thus, an estimation of the theoretical exposure of top predators via the aquatic and terrestrial food chain has been performed and is presented in the following tables. In accordance with the ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017), the predicted environmental concentration in fish- and earthworm-eating top predators has been estimated according to the following relationships:

PECoral, fish-eating predator=PECwater x BCFfish x BMF

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
Predicted Environmental Concentration in fish-eating predators	PECoral, fish- eating predator	[mg.kg _{wet fish} ⁻	1.77E- 03	Output
Predicted Environmental Concentration in water	PEC _{water}	[mg.L ⁻¹]	1	Input
Bioconcentration Factor for fish on wet weight basis	BCF _{fish}	[L.kg _{wet fish} -1]	910 ²	Input
Biomagnification factor in fish	BMF	[-]	1 ³	Default

¹ PEC_{water} 1.95E-06 mg.L⁻¹ for Scenario 1

PECoral, earthworm-eating predator=

 $C_{earthworm} = (BCF_{earthworm} \times C_{porewater} + C_{soil} \times F_{gut} \times CONV_{soil}) / (1 + F_{gut} \times CONV_{soil})$

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
Predicted Environmental Concentration in earthworm-eating predators	PECoral, earthworm- eating predator	[mg.kg _{wet} earthworm ⁻¹]	1.08E-03	Output
Concentration in earthworm on wet weight basis	Cearthwor	[mg.kg _{wet} earthworm ⁻¹]	1.08E-03	Output
Bioconcentration Factor for earthworms on wet weight basis	BCF _{earth}	[mg.kgwet earthworm ⁻¹]	3796¹	Input
Concentration in porewater	Cporewater	[mg.L ⁻¹]	2	Input
Concentration in soil	C _{soil}	[mg.kg _{wwt⁻¹]}	3	Input
Fraction of gut loading in worm	F _{gut}	[kg _{dwt} .kg wwt ⁻¹]	0.1 4	Default

² According to alpha-cypermethrin CAR.

³ According to alpha-cypermethrin CAR and Table 23 of ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017)

Conversion factor for soil concentration	CONVsoil	[kg _{wwt} .kg	1.13 4	Default
wet-dry weight soil		dwt ⁻¹]		

¹ According to alpha- cypermethrin CAR.

Based on the above the Predicted Environmental Concentration in fish-eating and earthworm-eating predators are presented in the following table.

Summary table on estimated theoretical exposition values (ETE) via food chain							
Scenario	PECoral, fish-eating predator	PECoral, earthworm-eating predator					
1 1.77E-03 1.08E-03							

Major change application

Secondary poisoning for Scenario 1

Alpha-cypermethrin has a potential for bioaccumulation in aquatic and terrestrial non-target organisms (log $K_{\rm OW}$ 5.5). Thus, an estimation of the theoretical exposure of top predators via the aquatic and terrestrial food chain has been performed and is presented in the following tables. In accordance with the ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017), the predicted environmental concentration in fish- and earthworm-eating top predators has been estimated according to the following relationships:

PECoral, fish-eating predator=PECwater x BCFfish x BMF

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
Predicted Environmental	PECoral, fish-	[mg.kgwet fish	4.25E-4	Output
Concentration in fish-eating	eating predator	<mark>1]</mark>	*	
predators predators				
Predicted Environmental	PEC water	[mg.L ⁻¹]	<mark>1</mark>	<u>Input</u>
Concentration in water				
Bioconcentration Factor for fish on	BCF _{fish}	[L.kgwet fish-1]	<mark>910²</mark>	Input
wet weight basis				
Biomagnification factor in fish	<u>BMF</u>	[-]	1 ³	Default

^{*} Fsim is 0.204%

PECoral, earthworm-eating predator=

 $C_{earthworm} = (BCF_{earthworm} \times C_{porewater} + C_{soil} \times F_{gut} \times CONV_{soil}) / (1 + F_{gut} \times CONV_{soil})$

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
---------------------------	---------------	-------------	--------------	---------------

² Worst case PEC_{porewater} 3.04E-07 mg/L in Scenario 1.

³ 180 days TWA PEC_{soil} 4.09E-04 mg/L in Scenario 1.

⁴ Default values were obtained from ECHA Guidance on the BPR (October 2017)

¹ PEC_{water} 4.67E-07 mg.L⁻¹ for Scenario 1

² According to alpha-cypermethrin CAR.

³ According to alpha-cypermethrin CAR and Table 23 of ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017)

Predicted Environmental Concentration in earthworm-eating predators	PECoral, earthworm- eating predator	[mg.kgwet earthworm -1]	1.95E-4 *	Output
Bioconcentration Factor for earthworms on wet weight basis	BCF _{earth}	[mg.kgwet earthworm ⁻¹]	3796 ¹	Input
Concentration in porewater	C porewater	[mg.L ⁻¹]	<mark>2</mark>	Input
Concentration in soil	Csoil	[mg.kg _{wwt⁻¹]}	3	Input
Fraction of gut loading in worm	F _{gut}	[kg _{dwt} .kg wwt ⁻¹]	0.1 4	Default
Conversion factor for soil concentration wet-dry weight soil	CONV _{soil}	[kg _{wwt} .kg dwt ⁻¹]	1.13 ⁴	Default

^{*} Fsim is 0.204%

Based on the above the Predicted Environmental Concentration in fish-eating and earthworm-eating predators are presented in the following table.

Summary table on estimated theoretical exposition values (ETE) via food							
	<u>chain</u>						
Scenario	Scenario PECoral, fish-eating predator PECoral, earthworm-eating predator						
1 (Fsim = 0.204%)	4.25E-04	1.95E-04					

Secondary poisoning for Scenario 2

Alpha- cypermethrin has a potential for bioaccumulation in aquatic and terrestrial non-target organisms (log $K_{\rm OW}$ 5.5). Thus, an estimation of the theoretical exposure of top predators via the aquatic and terrestrial food chain has been performed and is presented in the following tables. In accordance with the ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017), the predicted environmental concentration in fish- and earthworm-eating top predators has been estimated according to the following relationships:

PECoral, fish-eating predator=PECwater x BCFfish x BMF

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
Predicted Environmental Concentration in fish-eating predators	PECoral, fish- eating predator	[mg.kg _{wet fish} ⁻	ı	Output
Predicted Environmental Concentration in water	PECwater	[mg.L ⁻¹]	1	Input
Bioconcentration Factor for fish on wet weight basis	BCF _{fish}	[L.kgwet fish ⁻¹]	910 ²	Input
Biomagnification factor in fish	BMF	[-]	13	Default

¹ According to alpha- cypermethrin CAR.

² Worst case PEC_{porewater} 5.5E-08 mg/L in Scenario 1 (Fsim = 0.204%).

 $^{^3}$ 180 days TWA PEC_{soil} 7.42E-05 mg/kg in Scenario 1(Fsim = 0.204%).

⁴ Default values were obtained from ECHA Guidance on the BPR (October 2017)

 1 PEC_{water} for worst case animal categories (i.e. 1,3, 5) in Scenario 2 for grassland based on nitrogen 10 years degradation. In particular, for bloodsucking pests: PECgrs10_degr-sw-N category 1 = 1.40E-06 mg/L, PECgrs10_degr-sw-N category 3 = 2.12E-06 mg/L, PECgrs10_degr-sw-N category 5 = 1.46E-06 mg/L.

² According to alpha-cypermethrin CAR.

PECoral, earthworm-eating predator=

 $C_{earthworm} = (BCF_{earthworm} \times C_{porewater} + C_{soil} \times F_{gut} \times CONV_{soil}) / (1 + F_{gut} \times CONV_{soil})$

Where:

Variable/parameter (unit)	Symbol	Unit	Value	Source
Predicted Environmental Concentration in earthworm-eating predators	PECoral, earthworm- eating predator	[mg.kg _{wet} earthworm ⁻¹]	-	Output
Concentration in earthworm on wet weight basis	Cearthworm	[mg.kgwet earthworm -1]	-	Output
Bioconcentration Factor for earthworms on wet weight basis	BCF _{earthwor}	[mg.kgwet earthworm -1]	3796¹	Input
Concentration in porewater	Cporewater	[mg.L ⁻¹]	2	Input
Concentration in soil	Csoil	[mg.kg wwt ⁻¹]	3	Input
Fraction of gut loading in worm	F _{gut}	[kg _{dwt} .kg wwt ⁻¹]	0.1 4	Default
Conversion factor for soil concentration wet-dry weight soil	CONV _{soil}	[kg _{wwt} .kg _{dwt} -1]	1.13 4	Default

¹ According to alpha- cypermethrin CAR.

Based on the above the Predicted Environmental Concentration in fish-eating and earthworm-eating predators are presented in the following table.

Summary table on estimated theoretical exposition values (ETE) via food chain for both bloodsucking pests and flies						
Scenario 2 PECoral, fish-eating predator PECoral, earthworm-eating predator						
Animal category 1	1.27E-03	1.92E-03				
Animal category 3 1.93E-03 2.90E-03						
Animal category 5 1.32E-03 1.99E-03						

³ According to alpha-cypermethrin CAR and Table 23 of ECHA Guidance on the BPR (Volume IV Environment –Version 2.0, October 2017)

 $^{^2}$ PEC_{porewater} for worst case animal categories (i.e. 1,3, 5) in Scenario 2 for grassland based on nitrogen 10 years degradation for bloodsucking pests. In particular: PEC_{porewater} grs10degr- N category 1 = 1.40E-05 mg/L, PEC_{porewater} grs10degr- N category 3 = 2.12E-05 mg/L, PEC_{porewater} grs10degr- N category 5 = 1.46E-05 mg/L.

 $^{^3}$ PEC_{soil} for worst case animal categories (i.e. 1,3, 5) in Scenario 2 for grassland based on nitrogen 10 years degradation for bloodsucking pests. In particular: PEC_{soil} grs10degr- N category 1 = 1.89E-02 mg/L, PEC_{soil} grs10degr- N category 3 = 2.85E-02 mg/L, PEC_{soil} grs10degr- N category 5 = 1.96E-02 mg/L.

⁴ Default values were obtained from ECHA Guidance on the BPR (October 2017)

2.2.8.3 Risk characterisation Scenario 1:

Atmosphere

Conclusion:

No risk characterisation for air was conducted as exposure to air is considered negligible

Sewage treatment plant (STP)

Summary table on calculated PEC/PNEC values				
SimpleTreat v3.1				
PEC/PNEC _{STP}				
Scenario 1	2.18E-07			

Conclusion:

In scenario 1, the microorganisms in STPs are not at risk. The PEC/PNEC ratios are far below 1.

Major change application

Sewage treatment plant (STP)

Summary table on calculated PEC/PNEC values				
SimpleTreat v4				
PEC/PNEC _{STP}				
Scenario 1 (Fsim = 0.204%)	5.2e-8			

Conclusion:

In scenario 1, the microorganisms in STPs are not at risk. The PEC/PNEC ratios are below 1.

Aquatic compartment

Summary table on calculated PEC/PNEC values				
PEC/PNEC _{water} PEC/PNEC _{sed} (EU agreed)				
Scenario 1 Houses, Fsim=0.815%	4.06E-01	3.31E+00		

Conclusion:

In the urban pest control scenario (scenario 1), aquatic organisms are not at risk. The PEC/PNEC ratios are below 1 and safe use is demonstrated.

Regarding sediment, the PEC/PNEC ratio with the EU agreed PNEC_{sediment} is above 1 for Scenario 1 with SimpleTreat v3.1 and 3-11 applications/year. Therefore, there is an unacceptable risk for sediment drewlling organisms for urban pest control scenario (scenario 1).

Major change application

Aquatic compartment

Summary table on calculated PEC/PNEC values				
SimpleTreat v4 PEC/PNECwater (EU agreed)				
Scenario 1 Houses, Fsim=0.204 %	0.10	0.79		

Conclusion:

- In the urban pest control scenario (scenario 1), aquatic organisms are not at risk. The PEC/PNEC ratios are below 1 and safe use is demonstrated.

- Regarding sediment, with the **Risk Mitigation Measure (RMM) of reduced frequency of application (1-2 applications/year)**, a safe use for sediment dwelling organisms for urban pest control scenario (scenario 1) can be shown.

Terrestrial compartment

Summary table on calculated PEC/PNEC values			
SimpleTreat v3.1			
Scenario 1	PEC/PNEC _{soil}		
PEC _{soil, 10} (0) * [mg/kg]	5.93E-04		

^{*} Worst case PEC value = immediately after the tenth application = Csludgesoil 10 (0)

Conclusion:

In scenario 1, soil organisms are not at risk. The PEC/PNEC ratios are far below 1.

Major change application

Terrestrial compartment

Summary table on calculated PEC/PNEC values				
SimpleTreat v4				
Scenario 1	PEC/PNEC _{soil}			
$PEC_{soil, 10} (30)^* [mg/kg] (Fsim = 0.204%)$	1.27e-4			

Conclusion:

In scenario 1, soil organisms are not at risk. The PEC/PNEC ratios are below 1.

Groundwater

According to the on Guidance on the Biocidal Products Regulation, Volume IV Environment - Part B Risk Assessment (active substances), April 2015, the concentration in soil pore water is taken as an indication for potential groundwater levels. PECs in groundwater were calculated accordingly using equation 67 and 68 of this guidance document. As a first approach, neither transport nor dilution in deeper soil layers nor uptake by plants is taken into consideration.

Groundwater concentrations in the urban pest control scenario (scenario 1) are far below the drinking water limit of 0.1 μ g/L.

Primary and secondary poisoning

Primary poisoning

Primary poisoning is not relevant for the foreseen use of Fendona 1.5 SC.

Secondary poisoning for Scenario 1

Summary table on secondary poisoning via the aquatic food chain						
Scenario	PEC _{oral, fish} -	PNEC _{birds} ¹	PNEC _{mammals} ²	PEC/PNEC _{birds}	PEC/PNEC _{mammals}	
5661141116	eating predator			o/ opiius	· = 5/ · · · = 5/// amiliais	
1	1.77E-03	5	2.67	3.55E-04	6.65E-04	
Sum	mary table o	n secondary	y poisoning via	the terrestria	l food chain	
	PEC _{oral} ,	PNEC _{birds} 1	PNEC _{mammals} ²			
Scenario	earthworm-eating			PEC/PNEC _{birds}	PEC/PNEC _{mammals}	
	predator					
1	1.08-03	5	2.67	2.16E-04	4.04E-04	

¹ PNEC_{bird} is 5 mg/kg food based on CAR of alpha- cypermethrin

Conclusion:

In scenario 1, secondary poisoning of aquatic and terrestrial organisms does not result in a risk. The PEC/PNEC ratios are all below 1.

Major change application

Secondary poisoning for Scenario 1

Su	Summary table on secondary poisoning via the aquatic food chain					
Scenario	Fsim [%]	PEC _{oral,} fish-eating predator	PNEC _{birds} ¹	PNEC _{mammals}	PEC/PNEC _{birds}	PEC/PNEC _{mammals}
<u>1</u>	0.204	4.25e-4	<mark>5</mark>	<mark>2.67</mark>	<mark>8.5e-5</mark>	1.59e-4
Sum	nmary ta	able on se	condary po	oisoning via t	he terrestrial f	f <mark>ood chain</mark>
Scenario Fsim [%] PECoral, earthworm- eating predator PNECbirds PNECmammals PEC/PNECmammals PEC/PNECmammals PEC/PNECmammals PEC/PNECmammals						
1	0.204	1.95e-4	<mark>5</mark>	<mark>2.67</mark>	3.9e-5	7.31e-5

¹ PNEC_{bird} is 5 mg/kg food based on CAR of alpha- cypermethrin

Conclusion:

In scenario 1, secondary poisoning of aquatic and terrestrial organisms does not result in a risk. The PEC/PNEC ratios are all below 1.

Scenario 2:

² PNEC_{mammal} is 2.67 mg/kg food based on CAR of alpha- cypermethrin

² PNEC_{mammal} is 2.67 mg/kg food based on CAR of alpha- cypermethrin

The risk assessment for Scenario 2 is performed, according to the Addendum to OECD SERIES ON EMISSION SCENARIO DOCUMENTS, Number 14 (Agreed at the Environment Working Group V on November 26, 2015), with PIECgrs10_degr-Ni1,i2,i3,i4 for terrestrial risk assessment, and with dividing PIECgrs10_degr-gw-Ni1,i2,i3,i4 by a dilution factor of 10 for surface water. Therefore, calculations for arable land and calculations based on P_2O_5 are not presented.

Note: The risk assessment for flies is not presented since this use is not authrorised (see efficacy section)

Atmosphere

Conclusion:

No risk characterisation for air was conducted as exposure to air is considered negligible

Sewage treatment plant (STP)

Release from the facility drain to an STP and exposure of microorganisms in the STP was not considered for the use in rural hygiene as Fendona 1.5 SC must not be used in stables/animal housings connected to a sewage treatment plant.

Aquatic compartment

Scenario 2: Table on calculated PEC/PNEC values for the aquatic compartment (relevant for biocide type <u>i2=2; bloodsucking pests</u>); considering the route spraying in stables → manure → application of manure/slurry to soil

Animal category (i1)								
	1	2	3	4	5	6		
PEC/PNEC _{water}								
Grassland sw- _{10_degr} -N	2.92E-01	1.41E-01	4.41E-01	2.66E-01	3.03E-01	2.15E-01		
PEC/PNEC _{sed} EU agreed								
Grassland sed-10_degr-N	2.38E+0	1.15E+0	3.60E+0	2.17E+0	2.47E+0	1.75E+0		
	7	9	10	13	14	15		
PEC/PNECwater								
Grassland sw- _{10_degr} -N	5.15E-02	5.75E-02	5.75E-02	6.75E-02	4.21E-02	9.05E-02		
PEC/PNEC _{sed} EU agreed								
Grassland sed-10_degr-N	4.20E-01	4.69E-01	4.69E-01	5.50E-01	3.43E-01	7.38E-01		
Conclusion:								

In scenario 2 (rural hygiene), aquatic organisms are not at risk for the exposure route spraying in stables=> manure => spreading manure / slurry on soil. However, for this exposure route, a risk to sediment dwelling organisms was identified when using the

PNEC $_{\text{sediment}}$ EU agreed for 6 out of 12 animal subcategories. In conclusion, a safe use for sediment dwelling organisms is identified for animal subcategories 7, 9, 10, 13, 14, 15 (for explanation of animal subcatefories number see relevant table in page 177).

Terrestrial compartment

- √ For biocide type i2=2; bloodsucking pests
- Considering degradation processes of alpha cypermethrin in soil, after 10 consecutive years application

PEC/PNEC in soil for <u>grassland</u>, 1 manure application/yr. after 10 consecutive years, taking degradation into account

Animal category (i1)										
	1	2	3	4	5	6				
Grassland-10_degr-N	2.14E-02	1.03E-02	3.23E-02	1.95E-02	2.22E-02	1.57E-02				
	7	9	10	13	14	15				
Grassland-10_degr-N	3.78E-03	4.21E-03	4.21E-03	4.95E-03	3.09E-03	6.64E-03				

Conclusion:

In scenario 2, soil organisms are not at risk. The PEC/PNEC ratios are far below 1.

Groundwater

According to the on Guidance on the Biocidal Products Regulation, Volume IV Environment - Part B Risk Assessment (active substances), April 2015, the concentration in soil pore water is taken as an indication for potential groundwater levels. PECs in groundwater were calculated accordingly using equation 67 and 68 of this guidance document. As a first approach, neither transport nor dilution in deeper soil layers nor uptake by plants is taken into consideration.

Groundwater concentrations in scenario 2 (rural hygiene) are far below the drinking water limit of $0.1 \mu g/L$.

Primary and secondary poisoning

Primary poisoning

Primary poisoning is not relevant for the foreseen use of Fendona 1.5 SC.

Secondary poisoning

Summary table on secondary poisoning via the aquatic food chain for both bloodsucking pests									
Scenario 2	PEC _{oral} , fish-eating predator	PNEC _{birds} ¹	PEC/PNEC _{birds}	PEC/PNEC _{mammals}					
Animal cat 1	1.27E-03	5	2.67	2.55E-04	4.77E-04				
Animal cat 3	1.93E-03	5	2.67	3.85E-04	7.22E-04				
Animal cat 5	1.32E-03	5	2.67	2.65E-04	4.96E-04				

Summary table on secondary poisoning via the terrestrial food chain for both bloodsucking pests									
Scenario 2	PEC _{oral} , earthworm- eating predator	PNEC _{birds} ¹	PNEC _{mammals} ²	PEC/PNEC _{birds}	PEC/PNEC _{mammals}				
Animal cat 1	1.92E-03	5	2.67	3.83E-04	7.17E-04				
Animal cat 3	2.90E-03	5	2.67	5.79E-04	1.08E-03				
Animal cat 5	1.99E-03	5	2.67	3.98E-04	7.46E-04				

¹ PNEC_{bird} is 5 mg/kg food based on CAR of alpha- cypermethrin

Conclusion:

In scenario 2, secondary poisoning of aquatic and terrestrial organisms does not result in a risk. The PEC/PNEC ratios are all below 1.

Mixture toxicity

Mixture toxicity is not relevant as alpha-cypermethrin is the only a.i. in Fendona 1.5 SC and the b.p. does not contain any substance of concern for the environment.

Aggregated exposure (combined for relevant emission sources)

Aggregated exposure is not relevant since the a.s. is only used for PT 18 purposes.

² PNEC_{mammal} is 2.67 mg/kg food based on CAR of alpha- cypermethrin

Overall conclusion on the risk assessment for the environment of the product

- The risk assessment for sewage treatment plants indicates safe use for the b.p. regarding to scenario 1 urban pest control. For scenario 2 this route was not considered as the product must not be used in animal shelters connected to an STP.
- The risk assessment for surface water indicates safe use for the b.p. in the urban pest control scenario (scenario 1, STP exposure route) and in the rural hygiene scenario (scenario 2) for the exposure route spraying in stables => manure => spreading manure / slurry on soil.
- The risk assessment **for sediment** indicates no safe use for the b.p. in the urban pest control scenario (scenario 1). In scenario 2 for the exposure route spraying in stables => manure => spreading manure / slurry on soil => run-off to surface water (sediment), a safe use for sediment dwelling organisms can be demonstrated for animal subcategories 7, 9, 10, 13, 14, 15 (for explanation of animal subcatefories number see relevant table in page 177).
- For both scenarios, no risk for soil is identified.
- For both scenarios, no risk for the groundwater is identified.
- For both scenarios, no risk for the secondary poisoning is identified.

Major change application

Overall conclusion on the risk assessment for the environment of the product

- The risk assessment for sewage treatment plants indicates safe use for the b.p. regarding to scenario 1 – urban pest control.
- The risk assessment for **surface water** indicates safe use for the b.p. in the urban pest control scenario (scenario 1, STP exposure route).
- The risk assessment **for sediment** indicates a safe use for the b.p. in the urban pest control scenario (scenario 1) for a reduced **Fsim of 0.204% (1-2 applications/y)**.
- For scenario 1, no risk for soil is identified.
- For scenario 1, no risk for the groundwater is identified.
- For scenario 1, no risk for the secondary poisoning is identified.

2.2.9 Measures to protect man, animals and the environment

<u>To protect man</u>: The indirect exposure of PCOs and the general public, respectively, to alpha-cypermethrin in b.p. does not pose an unacceptable health risk when following the label instructions of the biocidal product. PCOs should use protective clothing and protective gloves. In the context of good practice the additional label phrase is proposed: 'Allow the applied solution to dry before re-entry into the treated areas by either humans or animals'. Please refer to the conclusions in section 2.6.3.

<u>To protect animals</u>: The exposure of livestock animals following treatment of surfaces in animal houses with Fendona 1.5 SC is considered safe with the additional label phrase: 'Allow the applied solution to dry before re-entry into the treated areas by either humans or animals'. No additional measures are required. Please refer to section 2.7.

<u>To protect the environment:</u> Remains of the product and spillage must be collected and not discharged to sewage system. The indoor treatment in urban areas is restricted to crack and crevices or limited suface areas. For rural hygiene the product must not be used in animal houses connected to sewage treatment plants. To protect the aquatic environment product must not be discharged to the sewage system. Please refer to the conclusions in section 1.2.8.3.

2.2.10 Assessment of a combination of biocidal products

This section is not relevant since Fendona 1.5 SC is not inteneded to be used in combination with other biocidal products.

2.2.11 Comparative assessment

No comparative assessment is required.

3 ANNEXES

3.1 List of studies for the biocidal product

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
Skin sensitisation	,	2008 a	Evaluation of skin sensitization in guinea pigs of the test substance FENDONA 6 SC		RE.428.0396. 08	BASF S.A, Sao Paulo, SP, Brazil	DocID# 2008/300250 3	yes
Skin irritation / corrosion	,	2008 b	Evaluation of the primary dermal irritation in rabbits of the test substance FENDONA 6 SC	,,,	RE.413.0394. 08	BASF S.A., Sao Paulo, SP, Brazil	DocID# 2008/300250 2	yes
Eye irritation	,	2008 c	Evaluation of Eye Irritation of the test substance FENDONA 6 SC in rabbits		RE.421.0395. 08	BASF S.A, Sao Paulo, SP, Brazil	DocID# 2008/300252 3	yes
Analytical methods for the monitoring of residues in feeding stuff	Class T.,Bendig P., 2014		Validation of the BASF analytical method L0231/01 : Method for the determination of individual or co mbined diastereomeric forms of BAS 311 I (cis I, cis II (alphacypermethrin, BAS 310 I), trans III and trans IV) in animal matrices	PTRL Europe	428874	BASF SE	DocID 2013/136196 7	yes
Acute toxicity: oral	,	2008 a	Evaluation of Acute Oral Toxicity in Rats of test substance FENDONA 6 SC		RE.409.0392. 08	BASF S.A, Sao Paulo, SP, Brazil	DocID# 2008/300252 1	yes
Acute toxicity: dermal	,	2008 b	Evaluation of Acute Dermal Toxicity in Rats of test substance FENDONA 6 SC	, , , , , , , , , , , , , , , , , , ,	RE.440.0393. 08	BASF S.A, Sao Paulo, SP, Brazil	DocID# 2008/300252 2	yes

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal	Protection
Lindpoint	Author	rear	Tito	Luboratory	Study No.	Data owner	study no.	claimed
Efficacy data	Estany, D.	2016 a	Field trials to determine the efficacy of Fendona 6 SC against Blatella germanica	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166EE	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_109154 8	yes
Efficacy data	Estany, D.	2016 b	Field trials to determine the efficacy of Fendona 6 SC against Blatella germanica	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166CC	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_109154 3 with Addendum: DocID_2017_ 1119568	yes
Efficacy data	Estany, D.	2016 c	Field trial to determine the efficacy of Fendona 6SC against Blatta orientalis	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166CCC	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123573 8 with Addendum: DocID 2017/112369 7	yes
Efficacy data	Estany, D.	2016 d	Field trial to determine the efficacy of Fendona 6SC against Blatta orientalis and Periplaneta americana	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166EEEE	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123574 0	yes
Efficacy data	Estany, D.	2016 e	Field trial to determine the efficacy of Fendona 6 SC against Stomoxys calcitrans	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166CCCC	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123574 2 with Addendum: DocID 2017/112134 9	yes
Efficacy data	Estany, D.	2016 f	Field trial to determine the efficacy of Fendona 6 SC against Stomoxys calcitrans	i2LResearch Southern Europe, Cornellà del Terri, Spain	15/166EEEE	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123574 6	yes
Metabolism in livestock		2001	[trade name] insecticide (Alphacypermethrin - BAS 310 I): Magnitude of BAS 310 I residues in laying hen eggs, muscle, liver and abdominal fat after oral	, ■ ;	RES 00-052	BASF Agro Research, Princeton, NJ	AP00PT06	yes

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
			administration of BAS 310 I for 28 consecutive days					
Analytical methods	Frohn, D. and Singer, D.	2014	Supplement to CIPAC METHOD: ALPHA-CYPERMETHRIN 454 (APL0470/01 and APL0470/02) Additional Validation of the Analytical Method with respect to the formulation BAS 310 27 I as test item	BASF SE Crop Protection Ecology and Environmental Analytics, Speyerer Strasse 2, 67117 Limburgerhof, Germany		BASF SE	Doc ID# 2014/129864 0	yes
Efficacy data	Gibson, D.	2016	Laboratory bioassay to determine the efficacy of Fendona 6 SC applied at 30 mg ai/m2 against pests	i2LResearch Ltd, Cardiff, UK	15/164	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_108983 5 2017_111930 3	yes
Efficacy data	Gibson, D.	2016	Field trial to determine the efficacy of Fendona 6SC applied at 24 mg ai/m2 against black ants	i2LResearch Ltd, Cardiff, UK	15/166B	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_110053 8	yes
Efficacy data	Gibson, D.	2016	Laboratory bioassay to determine the efficacy of Fendona 6 SC applied at 15 mg ai/m2 against pests	i2LResearch Ltd, Cardiff, UK	15/164	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_108983 4 2017_111883 5	yes
Efficacy data	Gibson, D.	2016	Simulated use bioassay to determine the efficacy of Fendona 6 SC applied at 30 mg ai/m2 against pests	i2LResearch Ltd, Cardiff, UK	15/165	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_108983 7 2017_111930 6	yes
Efficacy data	Gibson, D.	2016	Simulated use bioassay to determine the efficacy of Fendona 6 SC applied at 15 mg ai/m2 against pests	i2LResearch Ltd, Cardiff, UK	15/165	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_108983 6 2017/111957 3	yes

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
Efficacy data	Gibson D.	2016	Simulated use bioassay to determine the efficacy of Fendona 1.5 SC and Fendona 6 SC applied as a residual spray against cockroaches	i2LResearch Ltd, Cardiff, UK	15/366	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_113639 0 2017/111957 5	yes
Efficacy data	Gibson, D.	2016	Field trial to determine the efficacy of Fendona 6SC apllied at 15 mg ai/m2 against black ants	i2LResearch Ltd, Cardiff, UK	15/166C	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123573 4	yes
Efficacy data	Gibson, D.	2016	Field trial to determine the efficacy of Fendona 6SC apllied at 15 mg ai/m2 against black ants	i2LResearch Ltd, Cardiff, UK	15/166D	BASF Pest Control Solutions, Cheadle Hulme, UK	DocID# 2016_123573 6	yes
Sediment toxicity	,	2016 a		, ,	S15-04450	BASF SE, Ludwigshafen, Germany	741161; DocID 2015/110765 0	yes
Sediment toxicity	,	2016 b		, ,	S15-04450	BASF SE, Ludwigshafen, Germany	741161; DocID 2016/108528 1	yes
Sediment toxicity		2016 c		, ,	S15-04449	BASF SE, Ludwigshafen, Germany	741163; DocID 2015/110765 1	yes
Sediment toxicity	,	2016 d		,	S15-04449	BASF SE, Ludwigshafen, Germany	741163; DocID 2016/108528 0	yes

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
Metabolism in livestock	,	2003			RES 01-008	BASF Agro Research, Princeton, NJ	AP00PT01	yes
Density Technical characteristics s of the biocidal product Flammability Appearance/ physical state/colour pH Surface tension Viscosity Storage stability and reactivity towards container material	Kroehl, T.	2008	Final report: Physical and chemical properties of BAS 310 22 I (Alpha-Cypermethrin 15 g/L SC) - Accelerated storage stability up to 2 weeks at 54 °C	BASF SE, BASF Agricultural Center Limburgerhof, Crop Protection Division, Ecology and Environmental Analytics, PO Box 120, 67114 Limburgerhof, Germany	338458_1	BASF SE - Agrarzentrum, Limburgerhof, Germany	DocID 2008/105511 7	yes
Storage stability and reactivity towards container material	Kroehl, T.	2012	alpha-Cypermethrin 15 g/L SC - chemical and physical stability of formula BAS 310 22 I when stored for up to 3 years at 23°c in commercial packs	BASF SE, BASF Agricultural Center Limburgerhof, Crop Protection Division, Ecology and Environmental Analytics, PO Box 120, 67114	338463-1	BASF SE - Agrarzentrum, Limburgerhof, Germany	DocID# 2011/126916 8	yes

Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
				Limburgerhof, Germany				
Efficacy data	Loakes, S.	2011	Laboratory bioassay to determine the residual efficacy of formulations BAS 310 27 I and BAS 310 08 I against bed bugs, Cimex lectularius, cat fleas, Ctenocephalides felis and Indian meal moths, Plodia interpunctella	i2LResearch Ltd, Cardiff, UK	11/131	BASF Pest Control Solutions, Cheshire, UK	DocID# 2011_129261 3	yes
Auto flammability	Löffler, U.	2003	Evaluation of physical and chemical properties according to directive 98/69/EC, Annex A9-A17	BASF Aktiengesellschaft GTC/S-L511, Ludwigshafen	SIK-Nr. 03/1649	BASF AG	DocID# 2003_102333 5	yes
Oxidising properties Explosivenes s	Löhr	2009	Evaluation of physical and chemical properties according to directive 94/37/EC (67/548/EC Annex V)	BASF SE, GTC/S- L511, Ludwigshafen	09/0544	BASF SE	DocID# 2009_104673 5	yes
Efficacy data	Lüpkes, KH.	2011	Residual efficacy as well as efficacy of still wet surfaces on various surfaces with product Fendona 15 SC / Littac 15 SC against House flies Musca domestica, Stable flies Stomoxys calcitrans and Litter beetles Alphitobius diaperinus	BioGenius GmbH, Bergisch Gladbach, Germany	BIO065a-11	BASF, Limburgerhof, Germany	DocID# 2011_129155 3	yes
Acute toxicity: inhalation		2004	BAS 310 27 I - Acute inhalation toxicity study in Wistar rats 4- hour liquid aerosol exposure		13I0412/0370 14	BASF AG, Ludwigshafen/R hein, Germany	2004/102768 7	yes
Efficacy data	Miller, P.F. & Peters, B.	1988 a	Trial to investigate efficacy of Fendona and Cislin 10 against Black House Ants	School of Biological & Biomedical Sciences, University of Technology, Sydney, Australia	R3W8	BASF	DocID# 1988_800000 3	yes
Efficacy data	Miller, P.F. & Peters, B.	1988 b	Report on the efficacy of Fendona and Cislin 10 against Periplaneta sp (American and Australian Cockroach)	School of Biological & Biomedical Sciences, University of Technology, Sydney, Australia		BASF	DocID# 1988_800000 1	yes

	Greece	Fendona 1.5 SC	PT18
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Endpoint	Author	Year	Titel	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
Efficacy data	Miller, P.F. & Peters, B.	1989	Trial to investigate efficacy of Fendona and Cislin 10 against Coastal Brown Ants	School of Biological & Biomedical Sciences, University of Technology, Sydney, Australia	R35W8	BASF	DocID# 1989_800000 1	yes
Storage stability test - long term storage at ambient temperature	Randt, C	2005	Shelf life in original container of the formulation BAS 310 27 I. 24 month storage – analytical results and physical properties	BASF SE, Agricultural Center Limburgerhof, Germany	168631_1	BASF	DocID 2005_102646 5	yes
Dermal absorption	,	2016	Report 14C-BAS 310 I (alpha- Cypermethrin) in BAS 310 27 I Study of penetration through human skin in vitro		10B0440/03B 028	BASF SE, Ludwigshafen, Germany	AP study ID 806752; Doc ID 2016/103036 7	yes
Analytical methods for the monitoring of residues in feeding stuff	Schernikau N.	2014	Independent laboratory validation of the BASF analytical method L0231/01: Determination of individual or combined diastereomeric forms of BAS 311 I (Cis I, Cis II (Alpha-Cypermethrin, BAS 310 I), trans III and trans IV) in animal matrices	Eurofins Agrosciences Services	S14-03796	BASF SE	DocID 2014/114588 2	yes
Viscocity	Seibecker, M	2017	Additional information on the rotational viscosity determination which was described in the accelerated study 168631_1	BASF SE, Agricultural Center Limburgerhof, Germany	168631_1 Additional information document	BASF	DocID 2017_109984 9	yes
Corrosive to metals	Titz	2019	Laboratory Corrosion Test of BAS 310 27 I, DocID 2019/1000541, to Classify Corrosive Substances of Class 8 in Accordance with the UN Recommendations on the Transport of Dangerous Goods.	BASF SE	Report: 219.1111 TBOI	BASF SE	?	yes

Greece Fendona 1.5 SC PT18

The following efficacy studies have been included with the major change application to support the claimed species listed under Use # 1.

Endpoint	Author	Year	Title	Laboratory	Study No.	Data owner	Internal study no.	Protection claimed
Efficacy data	Serrano, B.	2012	Field testing of the efficacy of an insecticidal product to control German cockroaches: BAS 310 27 I – FENDONA SC – 15 and 30 mg a.s./m ²	T.E.C. Laboratory, France	1468b/0911	BASF	DocID: 2019/ 1068358	yes
Efficacy data	Gibson, D.	2019	Bridging study to determine the efficacy of Fendona 6 SC applied as a residual spray against cockroaches (mortality end-point determination)	i2LResearch Ltd, UK	19/011	BASF	DocID: 2019/106835 6	yes
Efficacy data	Gibson, D.	2019	Simulated use bioassay to determine the efficacy of Fendona 6 SC (BAS 310 27 I) applied as a residual surface spray against Mosquitoes, <i>Culex quinquefasciatus</i> , and Houseflies, <i>Musca domestica</i> (mortality endpoint determination)	i2LResearch Ltd, UK	19/014	BASF	DocID: 2019/105784 8	yes
Efficacy data	Lupkes, K.H.	2012	Residual efficacy of product Fendona 6 SC against German cockroaches (<i>Blattella</i> <i>germanica</i>), Cat fleas (<i>Ctenocephalides felis</i>) and Bed bugs (<i>Cimex lectularius</i>).	BioGenius GmbH Biology, Germany	M04314	BASF	DocID: 2019/ 1068334	yes
Efficacy data	Lupkes, K.H.	<mark>2019</mark>	Report number: BIO010a-12 Statement on test report BioGenius BIO010a-12	BioGenius GmbH Biology, Germany	N/A	BASF	DocID: 2019/ 1068074	Yes

3.2 Output tables from exposure assessment tools

Table 1. Calculations of primary exposure of trained professionals (PCOs) to alpha-cypermethrin resulting from low-pressure insecticide application of Fendona in the rural hygiene scenario at 30 mg a.s./m² (spraying model 1 from TNsG on human exposure, with additional details from HSE survey EH74/3).

	Tier 1		Tier 2
	Unprotected	Protected (PPE)	Protected (PPE/RPE)
	Low-pressur	e (1-3 bar) insecticide	spraying (total 120 min)
Dermal mix/load/apply			
Potential dermal exposure	92 mg/min	92 mg/min	92 mg/min
Product on clothing (over 120 min)	11 040 mg	11 040 mg	11 040 mg
Penetration ⁽¹⁾	100 %	20%	20%
Product on skin	11 040 mg	2 208 mg	2 208 mg
Potential hand exposure	181 mg/min	10.7 mg/min	10.7 mg/min
Hand exposure (2)(3)	21 720 mg	1 284 mg	1 284 mg
Total product on skin	32 760 mg	3 492 mg	3 492 mg
0.06 % alpha-cypermethrin in application solution	19.66 mg	2.10 mg	2.10 mg
Dermal uptake	5%	5%	5%
Dose via skin	0.98 mg	0.11 mg	0.11 mg
Dermal body dose per day	0.0164 mg/kg bw/d	0.0018 mg/kg bw/d	0.0018 mg/kg bw/d
Inhalation mix/load/apply			
Aerial concentration	104 mg/m ³	104 mg/m³	104 mg/m³
Inhaled volume (over 120 min)	2.5 m³	2.5 m ³	2.5 m³
RPE protection factor	_	_	90%
Inhaled amount of product	260 mg	260 mg	26.0 mg
0.06 % alpha-cypermethrin in application solution	0.156 mg	0.156 mg	0.016 mg
Inhalation uptake	100%	100%	100%
Dose via inhalation (a.s.)	0.156 mg	0.156 mg	0.016 mg
Inhalative body dose per day	0.0026 mg/kg bw	0.0026 mg/kg bw	0.00027 mg/kg bw
Systemic dose (summary of routes)	0.0190 mg/kg bw/d	0.0044 mg/kg bw/d	0.0021 mg/kg bw/d

^{(1) 80%} protection factor for coated coverall for PT18 according to ECHA Biocides Human Health Exposure Methodology (p. 156)

⁽²⁾ Maximum (due to only five values) and median of outer glove exposure from HSE EH74/3, Table 4 for worst case and normal case, respectively, at Tier 1 (unprotected)

^{(3) 75&}lt;sup>th</sup> percentile and median of inside glove exposure from HSE EH74/3 for worst case and normal case, respectively, at Tier 2 (protected)

Table 2: Calculations of primary exposure of consumers (non-professionals) to alpha-cypermethrin after mixing and loading resulting from low-pressure insecticide application of Fendona in the rural hygiene scenario at 30 mg a.s./m² (worst case) according to Mixing and loading Model 2, non-professionals, TNsG p.134; HSL 2001 and Mixing and loading Model 3, professionals, TNsG p.135; EUROPOEM

_	Tier 1	
	Potential Exposure	
	Worst case	
	Low-pressure (1-3 bar) insecticide spraying	(total 7 min)
Dermal mixing/loading		
Product on bare hands and forearms per event	12.8 mg	
Penetration (1)	100 %	
Total product on skin	12.8 mg	
6% alpha-cypermethrin in concentrate	0.768 mg	
Dermal uptake	1%	
A.s. dose via skin	0.0077	
Dermal body dose a.s. per application	1.28 x 10 ⁻⁴ mg/kg bw/d	
Inhalation mixing/loading		
Default EUROPOEM	0.1 mg/kg a.s.	
6% alpha-cypermethrin in concentrate	0.006 mg	
Inhalation uptake	100%	
A.s. dose via inhalation	0.006 mg	
Inhalative body dose a.s. per day	1 x 10 ⁻⁴	
	mg/kg bw/d	
Systemic dose (summary of routes)	2.28 x 10 ⁻⁴ mg/kg bw/d	

⁽¹⁾ HEEG opinion 9, 2010: Non-professionals wearing long sleeved shirt and trousers or skirt with shoes – no gloves worn. Hand exposure is always 100%. Long sleeved shirt would result in 50% penetration for forearms, however individual exposure to forearms cannot be retrieved from the available data (TNsG 2002, p.134). Therefore 100% exposure to forearms is considered worst case.

Calculations of primary exposure of consumers (non-professionals) to alpha-cypermethrin after application resulting from low-pressure insecticide application of Fendona in the rural hygiene scenario at 30 mg a.s./m² according to application via hand-held trigger spray (Consumer spraying and dusting model 2 TNsG part 2, p 197, hand-held trigger spray)

	Tier 1	Tier 2
_	Potential Exposure	Wearing long sleeved shirt and trousers
Low-pressure (1-3 b	oar) insecticide sprayi	ng (total 7 min)
Dermal application		
Potential dermal exposure hands and forearms	36.1 mg/min	36.1 mg/min
Product on hands and forearms (100% ⁽¹⁾ , over 7 min)	252.7 mg	252.7 mg
Potential dermal exposure leg, feet & face	9.7 mg/min	9.7 mg/min
Product on leg, feet & face (over 7 min)	67.9 mg	67.9 mg
Penetration (1)	100 %	50%
Total product on leg, feet & face	67.9 mg	33.95 mg
Total product on skin	320.6 mg	286.6 mg
0.06% alpha-cypermethrin in application solution	0.1924 mg	0.172 mg
Dermal uptake	5%	5%
A.s. dose via skin	0.0096 mg	0.0086 mg
Dermal body dose a.s. per application	1.6 x 10 ⁻⁴ mg/kg bw/d	1.4 x 10 ⁻⁴ mg/kg bw/d
Inhalation application		
Aerial concentration	10.5 mg/m ³	10.5 mg/m³
Inhaled volume (over 7 min)	0.146 m³	0.146 m³
Inhaled amount of product	1.53 mg	1.53 mg
0.06% alpha-cypermethrin in application solution	9.2 x 10 ⁻⁴ mg	9.2 x 10 ⁻⁴ mg
Inhalation uptake	100%	100%
A.s. dose via inhalation	9.2 x 10 ⁻⁴ mg	9.2 x 10 ⁻⁴ mg
Inhalative body dose a.s. per day	1.5×10^{-5}	1.5×10^{-5}
	mg/kg bw/d	mg/kg bw/d
Systemic dose (summary of routes)	1.75 x 10 ⁻⁴ mg/kg bw/d	1.55 x 10 ⁻⁴ mg/kg bw/d

⁽¹⁾ HEEG opinion 9, 2010: Non-professionals wearing long sleeved shirt and trousers or skirt with shoes – no gloves worn. Hand exposure is always 100%. Long sleeved shirt would result in 50% penetration for forearms, however individual exposure to forearms cannot be retrieved from the available data (TNsG 2002, p.134). Therefore 100% exposure to forearms is considered worst case. Penetration to leg and feet is 50% considering consumers wear trouser with shoes. For exposure to face 50% penetration are considered due to no individual data for face exposure is available. However considering forearm exposure is much higher than exposure to face and that forearm exposure has been considered 100% penetration, the assumption on 50% penetration via face is considered acceptable.

Table 4: Calculation of acute exposure to alpha-cypermethrin via skin contact with Fendona-treated surfaces in the rural pest control scenario

Parameter	Definition	Value
Dislodgeable fraction formulation [mg/cm²]*	DF	0.53
Applied a.s. in formulation	М	0.06%
Hand Surface [cm²]	HS	410
Hand contamination	HC	100%
Dermal load [mg a.s.]	$DL = DF \times M \times HS \times HC$	1.3 x 10 ⁻¹
Dermal absorption	DA	5 %
Body weight [kg]	BW	60.0
Systemic dose via skin [mg/kg bw/d]	$I_{\text{dermal}} = \text{DL} \times \text{DA} \times \text{BW}^{\text{-}1}$	1.09×10^{-4}

^{*} based on TNsG part 2, p. 261 (Defaults for non-professional use and residential exposure to biocides), where the dislodgeable fraction formulation is calculated from the emission formulation rate of 0.65 g/sec, the use duration of 600 sec., a dislodgeable fraction of 30% and a surface area of 22 m^2 .

Table 5: Calculation of acute exposure to alpha-cypermethrin via skin contact with Fendona-treated surfaces in the crack and crevice application scenario (domestic exposure scenario)

Parameter	Definition	Values			
		Adults	Children	Toddlers	Infants
Dislodgeable fraction formulation [mg/cm²]*	DF	1.16	1.16	1.16	1.16
Applied a.s. in formulation	М	0.03%	0.03%	0.03%	0.03%
Hand Surface [cm²]	HS	410	427.8	230.4	196.8
Hand contamination	НС	100%	100%	100%	100%
Dermal load [mg a.s.]	DL = DF x M x HS x HC	0.14	0.15	0.08	0.068
Dermal absorption	DA	5%	5%	5%	5%
Body weight [kg]	BW	60	23.9	10	8
Systemic dose via skin [mg/kg bw/d]	$I_{dermal} = DL \times DA \times BW^{-1}$	1.2 x 10 ⁻⁴	3.1 x 10 ⁻⁴	4 x 10 ⁻⁴	4.2 x 10 ⁻⁴

^{*} Based on Pest control ConsExpo Factsheet.

Table 6: Calculation of the systemic dose exposure of infants via HTM contact (oral exposure).

Parameter	Definition		Values
		Toddlers	Infants
Dislodgeable fraction formulation [mg/cm²]*	DF	1.16	1.16
Applied a.s. in formulation	М	0.03%	0.03%
Hand surface area [%]	SA	20%	20%
Dermal load [mg a.s.]	DL = DF x M x SA	6.96 x 10 ⁻⁵	6.96 x 10 ⁻⁵
Efficiency of removal by saliva from skin	RE	50%	50%
Transfer coefficient [cm²/h]	TC	2000	2000
Body weight [kg]	BW	10	8
Oral exposure [mg/kg bw/d]	$E_{oral} = DL \times SA \times RE \times F \times BW^{-1}$	6.96 x 10 ⁻³	8.7 x 10 ⁻³
Oral absorption rate	AR _{oral}	0.45	0.45
Systemic oral dose [mg/kg bw/d]	$I_{oral} = E_{oral} \times AR_{oral}$	3.1 x 10 ⁻³	3.9 x 10 ⁻³

Table 7: Calculation of the systemic dose exposure of infants via HTM contact (oral exposure).

Parameter	Definition		Values
		Toddlers	Infants
Dislodgeable fraction formulation [mg/cm²]*	DF	0.18	0.18
Applied a.s. in formulation	M	0.03%	0.03%
Hand surface area [%]	SA	20%	20%
Dermal load [mg a.s.]	DL = DF x M x SA	1.08 x 10 ⁻⁵	1.08 x 10 ⁻⁵
Efficiency of removal by saliva from skin	RE	50%	50%
Transfer coefficient [cm²/h]	TC	2000	2000
Body weight [kg]	BW	10	8
Oral exposure [mg/kg bw/d]	$E_{oral} = DL \times SA \times RE \times F \times BW^{-1}$	1.08 x 10 ⁻³	1.35 x 10 ⁻³
Oral absorption rate	AR _{oral}	0.45	0.45
Systemic oral dose [mg/kg bw/d]	$I_{oral} = E_{oral} \times AR_{oral}$	4.86 x 10 ⁻⁴	6.07 x 10 ⁻⁴

Table 8: Calculated MRLs, HRs and STMRs for alpha-cypermethrin and input values for risk assessments

Groups and examples of	[mg/kg]	Cypermethrin MRLs
individual products to		(Reg. (EU) No 626/2017)
which the MRLs apply		[mg/kg]
Swine		
Muscle	0.051	2
Fat tissue	0.16	2
Liver	0.051	0.2
Kidney	0.051	0.2
Edible offals	0.051	0.2
Bovine		
Muscle	0.051	2
Fat tissue	0.064	2
Liver	0.051	0.2
Kidney	0.051	0.2
Edible offals	0.051	0.2
Poultry		
Muscle	0.051	0.1
Fat tissue	0.051	0.1
Liver	0.051	0.052
Kidney	0.051	0.052
Edible offals	0.051	0.052
Cattle		
Milk	0.011	0.05
Chicken		
Birds eggs	0.011	0.052

¹ Indicates lower limit of detection

2 Indicated lower limit of analytical determination

Table 9: Dietary risk assessment using the EMA standard food basket and EU MRLs (Reg. (EU) No 626/2017) or residue levels derived from feeding studies as input parameters

Species	Commodity	Cypermethrin MRLs (Reg. (EU) No 626/2017) [mg/kg]	Consumption via EMA food basket [kg/person]	Residue consumed [mg/person]
Ruminants	Milk	0.05	1.5	0.075
	Meat	2	0.3	0.6
	Fat	2	0.05	0.1
	Liver	0.2	0.1	0.02
	Kidney	0.2	0.05	0.01

ADI Total TMDI: 0.805 0.015 mg/kg bw % ADI: 89.4% 0.9 mg/person (60 kg bw)

Species	Commodity	Cypermethrin MRLs (Reg. (EU) No 626/2017) [mg/kg]	Consumption via EMA food basket [kg/person]	Residue consumed [mg/person]
Pigs	Meat	2	0.3	0.6
	Fat	2	0.05	0.1
	Liver	0.2	0.1	0.02
	Kidney	0.2	0.05	0.01

ADI Total TMDI: 0.73 0.015 mg/kg bw % ADI: 81.1% 0.9 mg/person (60 kg bw)

Species	Commodity	Cypermethrin	Consumption	Residue
		MRLs	via EMA food	consumed
		(Reg. (EU)	basket	[mg/person]
		No	[kg/person]	
		626/2017)		
		[mg/kg]		
Poultry	Egg	0.05	0.1	0.005
	Meat	0.1	0.3	0.03
	Fat	0.1	0.05	0.005
	Liver	0.05	0.1	0.005
	Kidney	0.05	0.05	0.0025

ADI Total TMDI: 0.0475 0.015 mg/kg bw % ADI: 5.3% 0.9 mg/person (60 kg bw)

Species	Commodity	Cypermethrin MRLs (Reg. (EU) No 626/2017) [mg/kg]	Consumption via EMA food basket [kg/person]	
Ruminants	Milk	0.05	1.5	0.075
	Meat	2	0.3	0.6
	Fat	2	0.05	0.1
	Liver	0.2	0.1	0.02
	Kidney	0.2	0.05	0.01

ADI Total TMDI: 0.805 0.015 mg/kg bw % ADI: 89.4% 0.9 mg/person (60 kg bw)

Species	Commodity	Cypermethrin MRLs (Reg. (EU) No 626/2017) [mg/kg]	Consumption via EMA food basket [kg/person]	
Pigs	Meat	2	0.3	0.6
	Fat	2	0.05	0.1
	Liver	0.2	0.1	0.02
	Kidney	0.2	0.05	0.01

ADI Total TMDI: 0.73 0.015 mg/kg bw % ADI: 81.1% 0.9 mg/person (60 kg bw)

Species	Commodity	Cypermethrin	Consumption	Residue
		MRLs	via EMA food	consumed
		(Reg. (EU)	basket	[mg/person]
		No	[kg/person]	
		626/2017)		
		[mg/kg]		
Poultry	Egg	0.05	0.1	0.005
	Meat	0.1	0.3	0.03
	Fat	0.1	0.05	0.005
	Liver	0.05	0.1	0.005
	Kidney	0.05	0.05	0.0025

ADI Total TMDI: 0.0475 0.015 mg/kg bw % ADI: 5.3% 0.9 mg/person (60 kg bw)

Table 10: TMDI calculation for alpha-cypermethrin with PRIMo Model (Rev 2.0) using MRLs for the biocide uses submitted in this dossier

ook for refined calculations
refined calculations

The risk assessment has been performed on the basis of the MRLs collected from Member States in April 2006. For each pesticide/commodity the highest national MRL was identified (proposed temporary MRL = pTMRL).

The pTMRLs have been submitted to EFSA in September	r 2006.
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			Chronic ris	k assessment				
			TMDI (rar	nge) in % of ADI				
			minim	um - maximum				
				48				
		No of diets exceed	ling ADI:					
Highest calculate	d	Highest contributor		2nd contributor to		3rd contributor to		
TMDI values in 9	6	to MS diet	Commodity /	MS diet	Commodity /	MS diet	Commodity /	pTMRLs a
of ADI	MS Diet	(in % of ADI)	group of commodities	(in % of ADI)	group of commodities	(in % of ADI)	group of commodities	(in % of A
48.1	NL child	20.8	Swine: Meat	15.9	Bovine: Meat	9.8	Milk and cream.	(,
41.5	ES child	18.9	Bovine: Meat	16.5	Swine: Meat	4.2	Milk and cream.	
36.3	FR toddler	17.9	Bovine: Meat	13.2	Milk and cream.	4.4	Swine: Meat	
35.0	WHO regional European diet	16.8	Swine: Meat	14.1	Bovine: Meat	1.6	Swine: Fat free of lean meat	
29.8	WHO Cluster diet F	15.4	Swine: Meat	12.0	Bovine: Meat	1.3	Milk and cream,	
25.4	WHO Cluster diet B	11.0	Bovine: Meat	10.3	Swine: Meat	1.1	Milk and cream.	
24.6	NL general	12.3	Swine: Meat	9.4	Bovine: Meat	2.2	Milk and cream.	
22.4	ES adult	10.0	Bovine: Meat	9.5	Swine: Meat	1.7	Milk and cream.	
21.5	WHO cluster diet E	9.4	Bovine: Meat	7.8	Swine: Meat	2.3	Swine: Fat free of lean meat	
19.6	LT adult	12.9	Swine: Meat	3.4	Bovine: Meat	1.7	Swine: Fat free of lean meat	
17.6	FR infant	8.6	Milk and cream.	7.7	Bovine: Meat	0.9	Swine: Meat	
15.6	DE child	5.8	Swine: Meat	4.8	Milk and cream.	4.5	Bovine: Meat	
13.5	UK Infant	12.9	Milk and cream,	0.4	Birds' eggs	0.1	Bovine: Liver	
13.4	WHO cluster diet D	8.0	Bovine: Meat	1.8	Swine: Meat	1.7	Milk and cream.	
12.9	IE adult	5.4	Bovine: Meat	5.3	Swine: Meat	0.9	Milk and cream,	
11.8	FR all population	6.7	Bovine: Meat	3.9	Swine: Meat	0.9	Milk and cream.	
9.4	DK adult	7.4	Bovine: Meat	1.8	Milk and cream,	0.1	Birds' eggs	
7.2	UK Toddler	6.9	Milk and cream.	0.3	Birds' eggs	0.0	Bovine: Liver	
4.7	DK child	4.2	Milk and cream,	0.3	Birds' eggs	0.2	Bovine: Liver	
4.4	SE general population 90th percentile	4.1	Milk and cream,	0.3	Birds' eggs		FRUIT (FRESH OR FROZEN)	
2.0	FI adult	1.9	Milk and cream,	0.1	Birds' eggs		FRUIT (FRESH OR FROZEN)	
1.2	UK vegetarian	1.1	Milk and cream,	0.1	Birds' eggs	0.0	Poultry: Meat	
1.1	UK Adult	1.0	Milk and cream,	0.1	Birds' eggs	0.0	Other bovine products	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
Conclusion:								

Table 11: TMDI calculation for alpha-cypermethrin with PRIMo Model (rev 2.0) using residues levels as derived from the animal feeding studies for the biocide uses submitted in this dossier

Alph	a-cypern	nethrin		Prepare work	book for refined calculatio	ons
Status of the active substance:	Listed	Code no.				
LOQ (mg/kg bw):	0.01 / 0.05	proposed LOQ:				
Tox	icological end	points				
ADI (mg/kg bw/day):	0.015	ARfD (mg/kg bw):	0.04	Undo	refined calculations	
Source of ADI:	EU	Source of ARfD:	EU			
Year of evaluation:	2004	Year of evaluation:	2004			

The risk assessment has been performed on the basis of the MRLs collected from Member States in April 2006. For each pesticide/commodity the highest national MRL was identified (proposed temporary MRL = pTMRL).

			Chronic ris	k assessment				
			TMDI (ra	nge) in % of ADI				
				num - maximum				
				4.0				
		No of diets exceed	dina ADI:					
Highest calculated		Highest contributor		2nd contributor to	<u> </u>	3rd contributor to		
TMDI values in %		to MS diet	Commodity /	MS diet	Commodity /	MS diet	Commodity /	pTMRLs at
of ADI	MS Diet	(in % of ADI)	group of commodities	(in % of ADI)	group of commodities	(in % of ADI)	group of commodities	(in % of AE
3.6	FR toddler	2.6	Milk and cream.	0.4	Bovine: Meat	0.3	Poultry: Meat	(III /6 OI AL
3.3	NL child	2.0	Milk and cream.	0.5	Swine: Meat	0.4	Bovine: Meat	_
2.7	UK Infant	2.6	Milk and cream.	0.5	Birds' eggs	0.0	Bovine: Liver	_
2.3	ES child	0.8	Milk and cream.	0.1	Bovine: Meat	0.0	Poultry: Meat	
2.2	FR infant	1.7	Milk and cream,	0.3	Bovine: Meat	0.4	Poultry: Meat	_
1.7	WHO regional European diet	0.4	Swine: Meat	0.4	Bovine: Meat	0.2	Milk and cream.	_
1.5	DE child	1.0	Milk and cream.	0.4	Poultry: Meat	0.3	Swine: Meat	
1.4	UK Toddler	1.4	Milk and cream.	0.2	Birds' eggs	0.0	Bovine: Liver	
1.3	WHO Cluster diet B	0.3	Poultry: Meat	0.1	Bovine: Meat	0.0	Swine: Meat	
	WHO cluster diet E	0.3	Poultry: Meat	0.3	Bovine: Meat	0.3	Milk and cream.	_
1.2	WHO Cluster diet E	0.3	Swine: Meat	0.3	Bovine: Meat	0.2	Milk and cream.	
1.2	NL general	0.4	Milk and cream.	0.3	Swine: Meat	0.2	Bovine: Meat	
1.1	ES adult	0.3	Milk and cream.	0.3	Bovine: Meat	0.2	Swine: Meat	
	LT adult	0.3	Swine: Meat	0.2	Milk and cream,	0.2	Swine: Fat free of lean meat	_
0.9	DK child	0.8	Milk and cream.	0.1	Birds' eggs	0.0	Bovine: Liver	
0.9	WHO cluster diet D	0.3	Milk and cream.	0.1	Bovine: Meat	0.1	Poultry: Meat	
0.9	SE general population 90th percentile	0.8	Milk and cream.	0.1	Birds' eaas	0.1	FRUIT (FRESH OR FROZEN)	
0.9	IE adult	0.8	Other swine products	0.1	Milk and cream,	0.1	Bovine: Meat	
0.9	FR all population	0.2	Poultry: Meat	0.2	Milk and cream,	0.1	Bovine: Meat	_
0.6	DK adult	0.4	Milk and cream,	0.2	Bovine: Meat	0.0	Birds' eggs	
0.4	FI adult	0.4	Milk and cream.	0.0	Birds' eaas	0.0	FRUIT (FRESH OR FROZEN)	
0.4	UK vegetarian	0.2	Milk and cream.	0.0	Birds' eggs	0.0	Poultry: Meat	
0.3	UK Adult	0.2	Milk and cream,	0.0	Birds' eggs	0.0	Other bovine products	
0.2	IT adult	0.2	FRUIT (FRESH OR FROZEN)	0.0	FRUIT (FRESH OR FROZEN)	0.0	FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	IT adult		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)		FRUIT (FRESH OR FROZEN)	
	11 addit		TROTT (TRESTFOR TROZEN)		TROTT (TRESTFOR TROZEN)		THOR (TREOTOR TROZEN)	_
	l l		-					+
Conclusion:	retical Maximum Daily Intakes (TMDI), ba							

Table 12: IESTRI calculation for the biocide uses

	Acute risk a	ssessment	/children				Acute risk ass	essment / ad	dults / general	population	
The acute risk asse	essment is based on the A	ARfD.									
	ty the calculation is based tht was used for the IEST		reported MS consur	nption per kg bw and	the corresponding	ng unit weight from	the MS with the critical o	onsumption. If no	o data on the unit we	eight was available from that MS an	average
In the IESTI 1 calci	ulation, the variability fact	tors were 10, 7 o	r 5 (according to JN	MPR manual 2002), fo	or lettuce a variat	oility factor of 5 was	used.				
	ulations, the variability fac										
	the calculated residue le										
THI COHOIG WITCE 15	the dalodiated residue to	VCI WITHOUT WOULD	T	c cquivalent to 100 /t	or are rade.						
1											
No of commodities	s for which ARfD/ADI		No of commoditie	s for which		No of commoditie	s for which ARfD/ADI		No of commoditie	es for which ARfD/ADI is exceeded	i
No of commodities is exceeded (IEST			No of commoditie			No of commodities is exceeded (IES)			No of commoditie	es for which ARfD/ADI is exceeded	d
					**)			**)		es for which ARfD/ADI is exceeded *)	-
is exceeded (IEST			ARfD/ADI is excee		**) pTMRL/ threshold MRL	is exceeded (IES			(IESTI 2):	s for which ARfD/ADI is exceeded *)	-
is exceeded (IEST IESTI 1		**) pTMRL/	ARfD/ADI is exceed		**) pTMRL/	is exceeded (IES		**) pTMRL/	(IESTI 2): IESTI 2	*) Commodities	**) pTMR threshold
is exceeded (IEST IESTI 1 Highest % of	1 1): *)	**) pTMRL/ threshold MRL	ARfD/ADI is exceed IESTI 2 Highest % of	eded (IESTI 2): *)	**) pTMRL/ threshold MRL	is exceeded (IESTI 1 Highest % of	TI 1): *)	**) pTMRL/ threshold MRL	(IESTI 2): IESTI 2 Highest % of	*)	**) pTMR threshold (mg/k
is exceeded (IEST IESTI 1 Highest % of ARfD/ADI	11): *) Commodities	**) pTMRL/ threshold MRL (mg/kg)	ARfD/ADI is exceed IESTI 2 Highest % of ARfD/ADI	eded (IESTI 2): *) Commodities	**) pTMRL/ threshold MRL (mg/kg)	is exceeded (IES' IESTI 1 Highest % of ARfD/ADI	TI 1): *) Commodities	**) pTMRL/ threshold MRL (mg/kg)	(IESTI 2): IESTI 2 Highest % of ARfD/ADI	*) Commodities	**) pTMR threshold (mg/k
is exceeded (IEST IESTI 1 Highest % of ARfD/ADI 63.9	11): *) Commodities Bovine: Meat	**) pTMRL/ threshold MRL (mg/kg) 2 / - 2 / -	ARfD/ADI is exceed IESTI 2 Highest % of ARfD/ADI 63.9	*) Commodities Bovine: Meat	**) pTMRL/ threshold MRL (mg/kg) 2 / -	is exceeded (IES' IESTI 1 Highest % of ARfD/ADI 29.8	*) Commodities Bovine: Meat	**) pTMRL/ threshold MRL (mg/kg) 2 / -	(IESTI 2): IESTI 2 Highest % of ARfD/ADI 29.8	*) Commodities Bovine: Meat	**)
is exceeded (IEST) IESTI 1 Highest % of ARfD/ADI 63.9 42.4	11): *) Commodities Bovine: Meat Swine: Meat	**) pTMRL/ threshold MRL (mg/kg) 2 / - 2 / -	ARfD/ADI is exceed IESTI 2 Highest % of ARfD/ADI 63.9 42.4	*) Commodities Bovine: Meat Swine: Meat	pTMRL/ threshold MRL (mg/kg) 2 / - 2 / -	is exceeded (IES' IESTI 1 Highest % of AR(D)/ADI 29.8 25.0	Ti 1): *) Commodities Bovine: Meat Swine: Meat	pTMRL/ threshold MRL (mg/kg) 2 / - 2 / -	(IESTI 2): IESTI 2 Highest % of AR(D)/ADI 29.8 25.0	*) Commodities Bovine: Meat Swine: Meat	**) pTMR threshold (mg/k

3.3 New information on the active substance

Not available

3.4 Residue behaviour

Not relevant

3.5 Summaries of the efficacy studies (B.5.10.1-xx)

Not applicable. IUCLID file is available.

3.6 Confidential annex

See sepate file.

3.7