PEER REVIEW REPORT ON **MYCLOBUTANIL** 07.05.2007

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List of all reports from PRAPeR Expert Meetings

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13-16.03.2007	PRAPeR expert meeting 16	Physical and Chemical Properties
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REPORT OF PRAPeR EXPERT MEETING 16

MYCLOBUTANIL

Rapporteur Member State: BE

Specific comments on the active substance in the section

1. Physical and Chemical Properties

are already listed in the relevant reporting table. Comments submitted for this meeting are listed below.

1. Comments submitted for this meeting:

Date	Supplier	File Name
none		

2. Documents submitted for meeting:

Date	Supplier	File Name
none		

3. Documents tabled at the meeting:

Date	Supplier	File Name
none		

The conclusions of the meeting were as follows:

4. **Data on preparations:** Systhane 20 EW (GF-1317)

5. **Classification and labelling:** Not discussed

6. **Recommended restrictions/conditions for use:** None

7. Reference list: not discussed

Areas of concern: None

Appendix 1: Discussion table: MYCLOBUTANIL

Appendix 2: Evaluation table

Appendix 1: Discussion Table, myclobutanil (Fu)

1. Physical and Chemical Properties

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 1.1 RMS to amend the list of end points to clarify the ratio of both enantiomers (preferably in the box "minimum purity"). See reporting table 1(5).	The notifier has stated that the active is a racemic mixture with a ratio of the isomers of 1:1. The experts accepted that based on the method of manufacture the active will be a racemic mixture. **Message to tox, residues, fate and ecotox that the techncial material is a racemic mixture and has this been considered in the risk assessment.**	Open point fulfilled. .
	Open point 1.2 The criteria for accepting data on pourability should be discussed generally in a meeting of expert. See reporting table 1(13).	It was noted that the residue/rinsed residue may be high in the container. This should be considered at Member State level for possible labelling considerations.	Open point fulfilled.
1.1	Data requirement (for formal reasons) The applicant should provide spectra for relevant impurity 14. [This should be	Data was submitted and accepted	Data requirement fulfilled. .

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 1(15).		
	Open point 1.3 The acceptance of the study for the determination of the surface tension of myclobutanil should be discussed in a meeting of experts. See reporting table 1(16).	The experts accepted the data on the surface tension in this specific case.	Open point fulfilled. .

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 1.4 RMS to include the additional information concerning content of the relevant impurity in the formulation in an addendum or revised DAR. The point is addressed, however, this additional information should be transferred into an addendum to the DAR, because of its importance. See reporting table 1(17).	Additional information on the impurities has been presented in an addendum. It was noted that there is no method for the determination of the relevant impurity in the PPP. The experts agreed that a method was not required as their was a justification provided by the notifier that the impurity will not be formed during the manufacture of the PPP or during storage. EFSA to note this in their conclusion that the determination of the relevant impurity in the PPP was not required as a justification that it would not form during the manufacture of the PPP or during storage was accepted. However, the method will be a requirement at Member State level.	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
1.2	Data requirement A shelf life study must be provided. [This should be regarded as a technical data requirement since the data have been already submitted to the RMS (November 2006] See reporting table 1(20).	Data was submitted and accepted.	Data requirement fulfilled. .
	Open point 1.5 The acceptability of the analytical method for the determination of impurities in the technical material should be discussed in a meeting of experts. See reporting table 1(30).	The experts accepted the justification given by the notifier in the evaluation table.	Open point fulfilled. .

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
1.3	Data requirement (for formal reasons) The applicant should provide additional validation data for the air method. [This should be regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 1(32).	A new method has been submitted and was acceptable. Initially the linear range was questioned but it was found to be acceptable.	Data requirement fulfilled. .
	Open point 1.6 The acceptability of the analytical method used in storage stability studies with Systhane 20EW should be discussed in a meeting of experts. See reporting table 1(33).	Method validation data were available for an EC formulation, the experts agreed that this data could be used to support the method with chromatograms for Systhane 20 EW and therefore accepted the RMS conclusion.	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 1.7: octanol/water coefficient to be discussed See reporting table 1.7	The original value in the DAR was calculated and it was close to the cut off of 3. However, with a different calculation method the result was above three. Now an additional study has been supplied that section one does not require and it should not be relied on unless ecotox require it. **Message to ecotox that there is a new study available and it is for ecotox to decide if this new study is required. From a scientific point of view the new study is acceptable.**	Open point fulfilled.
	New open point 1.8: RMS to amend the list of end points according to the discussion table.	New template to be used, Remove French wording, In list of relevant impurities delete wording 'impurity 14', For the partition coefficient the experimental value should be removed if it is not relied on by ecotox and the calculated value should be listed. If MRLs are proposed for material of animal origin, the methods will have to be included. In the box for method of analysis of impurities in the technical material 'impurities 1-14' should be removed and remove the internal standard.	Open point open.

Appendix 2: Evaluation table

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Section 1 Data requirements: ***3*** Open points: ***6***			Section 1 Data requirements: ***0*** Open points: ***1***
	Open point 1.1 RMS to amend the list of end points to clarify the ratio of both enantiomers (preferably in the box "minimum purity"). See reporting table 1(5).	**DAS:** Noted	RMS has amended the LoEP. As in the production process of myclobutanil neither stereo-selective reaction types nor enantiomerically pure substances are used, the myclobutanil obtained is a racemic mixture, i.e. 50:50 mixture of the two possible optical isomers. The nofier confirmed that there is no difference in biological activity between the two isomers.	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.
	Open point 1.2 The criteria for accepting data on pourability should be discussed generally in a meeting of expert. See reporting table 1(13).	**DAS:** as stated in column 3, point 1(13) of the Reporting Table, the pourability of the EW formulation (GF-1317) was to be investigated also in the shelf life study. This report (Report 04-407-G) was submitted on November 9th 2006 to RMS. Within report: 04-407-G: **Pourability:** Initial: % residue was 5.7 and % rinsed residue was not determined After storage: % residue was 4.0% and % rinsed residue was 0.2	After 2 years of storage at ambient temperature, the residue was 4.0%. (See addendum to Vol.3(B2), dd. March 2007). The initial residue (before storage) was determined to be 5.7% in study Tidswell (2004; ER 60.12), whereas in stability study Speak & Kendall (2004; ER 60.11; cfr. B.2.2.16) an initial residue of 4.7% was reported. The criteria for accepting data on pourability should be discussed generally in a meeting of experts.	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
1.1	Data requirement (for formal reasons) The applicant should provide spectra for relevant impurity 14. [This should be regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 1(15).	**DAS:** Noted	The requested spectra were submitted to the RMS and are considered acceptable (see addendum to Vol.3(B2), dd. March 2007); data requirement is considered to be fulfilled.	PRAPeR 16 (13 – 16.03.2007): Data requirement fulfilled.
	Open point 1.3 The acceptance of the study for the determination of the surface tension of myclobutanil should be discussed in a meeting of experts. See reporting table 1(16).	**DAS:** indeed a higher purity is unlikely to change the surface tension value in a significative way.	As the purity of the test substance (i.e. 92.1%) is only slightly below the min. specified purity of the technical a.s. (i.e. 92.5%), the RMS considers the measured value to be representative for the technical a.s. as specified. Moreover, the conclusion on surface activity is very unlikely to change if a.s. of higher purity would be investigated, since there is a relative big difference between the trigger value (i.e. 60mN/m) and the measured value (i.e. 46.8 mN/m).	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Open point 1.4 RMS to include the additional information concerning content of the relevant impurity in the formulation in an addendum or revised DAR. The point is addressed, however, this additional information should be transferred into an addendum to the DAR, because of its importance. See reporting table 1(17).	**DAS:** Noted	The additional information, i.e. the notifier's statement with regard to content of relevant impurity in the formulation, has been transferred into an addendum to Vol.3(B2), dd. March 2007 and has been included in the updated version of Vol.4(C), dd. March 2007.	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.
1.2	Data requirement A shelf life study must be provided. [This should be regarded as a technical data requirement since the data have been already submitted to the RMS (November 2006] See reporting table 1(20).	**DAS:** Noted.	Shelf life study was received (Kendall, 2006 – Report No. 04-407-G) See addendum to Vol.3(B2), dd. March 2007.	PRAPeR 16 (13 – 16.03.2007): Data requirement fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Open point 1.5 The acceptability of the analytical method for the determination of impurities in the technical material should be discussed in a meeting of experts. See reporting table 1(30).	**DAS:** we confirm the justification reported in column 3, point 1(30) of the Reporting Table.	The notifier submitted following justification (June 2005): *"The SANCO/3030/99 document specifies that the Horwitz test does not always apply. The Horwitz equation applicability to low levels at 0.1% or less is not straightforward as minor differences between first and second significant figures, although not different in practical, will make the Horwitz test fail. In addition, the SANCO/3030/99 document specifies a minimum of 5 samples. The data generated over two separate days will introduce more variability. In practical cases there is no difference between e.g. 0.020%, 0.019% and 0.022%. They all are 0.02%." "Furthermore, if we apply the test on one set and remove the day-day variability, the Horwitz test passes."* The latter was demonstrated for one impurity, but appears not applicable to all impurities. However, it should be noted that in those cases, the Horwitz values are exceeded only slightly. The RMS considers this justification acceptable.	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
1.3	Data requirement (for formal reasons) The applicant should provide additional validation data for the air method. [This should be regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 1(32).	**DAS:** Noted	RMS considers the new analytical method, submitted by the notifier in August 2005, to be suitable for the determination of residues of Myclobutanil in air. See updated version of Vol.3(B5) dd. March 2007.	PRAPeR 16 (13 – 16.03.2007): Data requirement fulfilled.
	Open point 1.6 The acceptability of the analytical method used in storage stability studies with Synthane 20EW should be discussed in a meeting of experts. See reporting table 1(33).	**DAS:** we confirm our justification reported in column 2, point 1(33) of the Reporting Table.	RMS considers the justification submitted by the notifier acceptable.	PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.
	Open point 1.7: octanol/water coefficient to be discussed See reporting table 1.7			PRAPeR 16 (13 – 16.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	New open point 1.8: RMS to amend the list of end points according to the discussion table.			PRAPeR 16 (13 – 16.03.2007): Open point still open.

REPORT OF PRAPeR EXPERT MEETING 17

MYCLOBUTANIL

Rapporteur Member State: BE

Specific comments on the active substance in the section

4. Fate and behaviour in the environment

are already listed in the relevant reporting table. Comments submitted for this meeting are listed below.

1. Comments submitted for this meeting:

Date	Supplier	File Name
none		

2. Documents submitted for meeting:

Date	Supplier	File Name
none		

3. Documents tabled at the meeting:

Date	Supplier	File Name
none		

The conclusions of the meeting were as follows:

4. **Data on preparations:** SYSTHANE 20 EW

5. **Classification and labelling:** candidate to R53

8. **Recommended restrictions/conditions for use:** assessment performed only covers uses under aerobic soil conditions.

9. Reference list: Not discussed

Areas of concern: ground water exposure assessment not finalised.

Appendix 1: Discussion table: MYCLOBUTANIL

Appendix 2: Evaluation table

Appendix 1: Discussion Table, myclobutanil (Fu)

4. Fate and behaviour

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Message from PRAPeR 16 (PhysChem) Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.	Noted The methods of analysis used in all fate and behaviour studies are not stereoselective. There is no information on the individual behaviour of each isomer in the environment.	
	Open point 4.1 Meeting of experts to confirm that the available soil photolysis study is not reliable, then subsequently discuss if a new soil photolysis study should be required to complete the risk assessment for this substance, or not. The absence of significant absorption by myclobutanil above 290nm is important information for this	The experts agreed that the available study is not reliable with respect to the amount of metabolites formed and the photolysis rate of degradation but there is no reason to challenge the identification of the metabolite characterized in the study (R89089). It appears that the metabolite found does not occur in the aerobic degradation study. Therefore, some experts were of the opinion that the setting of a data gap would facilitate MSs to require the necessary data to clarify the potential relevance of this photolysis metabolite. The experts discussed the need for setting this data gap and concluded that to finalise the EU risk assessment it was not necessary, taking into consideration the arguments already presented by the applicant: that absorption at $\lambda \geq 290$ nm was $\varepsilon < 10$ L.mol^{-1}.cm^{-1}. If the current available EFSA PPR panel opinion[1] on the proposals for updated annex II & III data requirements was to be followed, the soil photolysis experiment would not need to have been performed.	Open point fulfilled

[1] The EFSA Journal (2007) 448, 1-17.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	discussion. See reporting table 4(3).		
	Open point 4.2 EFSA requests the endpoints should state: ,for the representative uses evaluated (summer application to fruit crops)' See reporting table 4(8).	This refers to the anaerobic degradation in soil. The RMS opinion expressed in the evaluation table was noted. After discussion among the experts, the anaerobic study was not considered necessary for the representative use on grapes but anaerobic conditions may not be excluded in apples and taking into consideration the long half life of this compound a data gap for an anaerobic study is identified for the apple uses.	Open point stay open. RMS to update the list of endpoints anaerobic box to state not required for the representative use on grapes, data required for the use on apples. A new data gap is identified
	New data gap	A soil degradation study under anaerobic conditions. This data gap is essential with respect to the use in apples.	Data gap A laboratory doil degradation study under anaerobic conditions is required for the representative use on apples.
	Open point 4.3 Please clarify in the endpoints if the lab studies method of DT50 calculation were estimated by linear or non linear regression (first order). See reporting table 4(9).	The list of endpoints has been updated.	Open point fulfilled

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 4.4 LoEP soil adsorption/desorption to be updated to state there is no clear pH dependence of soil adsorption. As the final RMS, UK and EFSA (see comment at line 4 (15)) conclusion is there is no clear evidence of pH dependance, RMS to to consider stating this position in a corrigendum or amended DAR. See reporting table 4(13).	The list of endpoints has been updated.	Open point fulfilled

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 4.5 RMS to add the second longer whole system single first order DT50 of 838 days to the endpoints sheet with an indication that the value is an uncertain estimate extrapolated significantly beyond the end of the study See reporting table 4(24).	The list of endpoints was updated, but no indication was added that the value was extrapolated significantly beyond study duration.	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
4.1	Data requirement FOCUSsw simulations at step 3 and 4 to be repeated for a single application for each intended use as these simulations are expected to give the highest PECsw concentrations appropriate for the short term risk assessment to free living aquatic organisms. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(29).	New calculations have been provided and included in an addendum. In some scenarios the single application calculations result in higher PEC SW values. In this particular case, the differences in the values were small. The real effect of these differences depends on how close the TERs values calculated are to the triggers. The scenarios for which a single application gives higher values in the calculated PEC SW, compared to multiple application calculation, have been identified: Apples D4, D5, R3 and R2 Vines R3 and R2 The new maximum PEC SW values have to be added to the LoEP.	Data requirement fulfilled.
4.2	Data requirement FOCUSsw simulations (step 4) to be repeated for the multiple application pattern for each crop of the intended use to account for potential accumulation from use in successive years as	These calculations have been provided and presented in the addendum. The experts agreed the values presented were acceptable as the calculation approach used was more conservative that that discussed in section 8.7.3 page 217 of SANCO/4802/2001 rev.2 final (May 2003) (FOCUSsw guidance).	Data requirement fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	outlined in section 8.7.3 page 217 of SANCO/4802/2001 rev.2 final (May 2003), as these simulations are expected to give the PECsw concentrations appropriate for assessing the long term risk assessment to free living aquatic organisms and will give the highest PECsediment required to complete the sediment dweller risk assessment. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(31).		

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 4.6 RMS to prepare an addendum to clarify: - the kinetic formation fraction that was used in the PECgw calculation for myclobutanil butyric acid. - the butyric acid DT50 for each of the 4 soils at experimental and then FOCUS reference conditions with the normalisation calculations used explained. - what the difference in the input values (application timing and crop interception) used to produce the 'realistic case and worst case' results reported were. See reporting table 4(32).	DAR has been updated. The formation fractions used in the modelling are reported now in the addendum. This identifies a new concern since, the maximum observed occurrence has been used and not the kinetic formation fraction that the modelling approach utilised requires. To get the 6 % maximum observed the kinetic formation fraction that the modelling requires needs to be in the range of 60 %. As a consequence the PEC GW need to be recalculated with appropriate kinetic formation fractions for metabolite myclobutanil butyric acid. The DT50 used in the modelling is at 25 °C only normalized for soil moisture (10 d) if this value was normalized to 20 °C then 14.5 d would be obtained. It was requested to indicate a value normalised at 20 °C in the LoEP to standardise presentation (it is not normal to find a 25°C in the list of endpoints so this could be confusing). Additionally, EFSA was not able to reproduce the normalised geometric mean value that would be obtained from the data reported in the studies. The value EFSA calculated was 15.6 d at 20°C and pF2 (compared to the equivalent value from the applicant of 14.5 days). The new modelling should use the correct normalized DT50 values for metabolite myclobutanil butyric acid. Normalisation of parent field DT50 is discussed in data requirement 4.3. The points identified above have been considered within data requirement 4.3	Open point fulfilled See maintained data requirement 4.3

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
4.3	Data requirement Applicant to provide new groundwater modelling for myclobutanil and myclobutanil butyric acid ensuring the FOCUS reference condition DT50 for myclobutanil butyric acid is correctly calculated in line with FOCUS guidance (the EFSA calculated this DT50 to be 15.6 days) and the formation fraction of butyric acid from myclobuanil used in modelling is clearly reported and reflects FOCUS guidance. Modelling to use FOCUS PEARL in addition to FOCUS PELMO or FOCUS PRZM. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(33).	The new PEC GW calculations are presented in the addendum and the DT50 values that were used are on p3 of this addendum. For myclobutanil DT50 was derived from field studies. The r^2 of the fitted DT50 s reported in p2 are in the range of 0.3-0.78. The graphical representation and χ^2 of the fitted data and a detailed and transparent presentation of the normalization procedure employed should be provided in order to adequately peer review the assessment presented. The same concerns already highlighted with respect to OP 4.6 with respect to formation fraction and DT50 of metabolite myclobutanil butyric acid apply.	Data requirement maintained Derivation of normalized field DT50 values employed need to be transparently presented. PEC GW need to be recalculated with appropriate kinetic formation fractions for metabolite myclobutanil butyric acid. The new modelling should use the correct normalized DT50 values for metabolite myclobutanil butyric acid. Two FOCUS models (following the EFSA PPR panel Opinion) should be used with the appropriate input parameters. For myclobutanil butyric acid if Kd is used 1/n should be 1 and not 0.9.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Residue definition	Soil: myclobutanil Surface Water : myclobutanil Sediment: myclobutanil Ground water: myclobutanil, myclobutanil butyric acid. Air : myclobutanil	
	New open point List of end points.	• The new maximum PEC SW values have to be added to the LoEP. (may be added in the available tables with a foot note indicating that come from a single application). Replace the max values for D4, D5, R2 and R3 by the single application ones. • Rate of degradation box for the myclobutanil butyric acid correct value to be calculated and presented for 20 degrees. • PEC GW to be deleted (eventually replaced by the correct ones) • Accumulated PEC sed values need to be placed in the list of end points (Existing PEC sed to be removed) • Individual half life and Kfoc values to be reported in the list of end points. • Field normalized values for the DT50 of myclobutanil to be deleted since they are not considered peer reviewed. • Mean of 1/n to be reported (or indicate if it is default value) and the mean of Kfoc instead of Koc, or clarify if it is a Kdoc. For the butyric acid just Kd • Box for SW DT50, replace representative worst case by longest DT50.	New open point RMS to update the list of endpoints as indicated in column 2.

Appendix 2: Evaluation table

4. fate and behaviour in the environment

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	Section 4 Data requirements: ***3*** Open points: ***6***			Section 4 Data requirements: ***1*** Data gap: ***1*** Open points: ***2***
	Open point 4.1 Meeting of experts to confirm that the available soil photolysis study is not reliable, then subsequently discuss if a new soil photolysis study should be required to complete the risk assessment for this substance, or not. The absence of significant absorption by myclobutanil above 290nm is important information for this discussion. See reporting table 4(3).	**DAS:** Whilst some limited degradation occurred under the conditions of the soil photolysis study, this used continuous irradiation (and not a light/dark cycle) at 34ºC (higher than the nominal 20ºC recommended by SETAC). In fact, the slightly enhanced degradation seen in the photolysed samples compared to the dark controls at 30 days could be due to temperature effects. This is because the dark controls were covered in foil to exclude light, which would probably mean they were incubated at a lower temperature than 34°C. Furthermore, myclobutanil is not applied directly to soil, but is used as a foliar application in apple orchards and vineyards. This would limit exposure to soil, as indicated by 60-70% FOCUS crop interception values. In conclusion, these points, when considered in conjunction with the fact that myclobutanil does not absorb	As RMS we confirmed that photolysis is not a significant route of degradation in the environment. As such, further investigation of this potential route of degradation in a new study is not considered necessary.	PRAPeR 17 (19. – 23.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
		above 290 nm, indicate that soil photolysis would not be expected to be a significant route of degradation in the environment. As such, further investigation of this potential route of degradation in a new study is not considered necessary.		
	Open point 4.2 EFSA requests the endpoints should state: ‚for the representative uses evaluated (summer application to fruit crops)' See reporting table 4(8).	**DAS:** Noted	As already indicated in the review report, we do not agree with this EFSA request.	PRAPeR 17 (19. – 23.03.2007): Open point stay open. RMS to update the list of endpoints anaerobic box to state not required for the representative use on grapes, data required for the use on apples. A new data gap is identified
	Data gap A laboratory doil degradation study under anaerobic conditions is required for the representative use on apples.			PRAPeR 17 (19. – 23.03.2007): Data gap open.
	Open point 4.3 Please clarify in the endpoints if the lab studies method of DT50 calculation were estimated by linear or non linear regression (first order). See reporting table 4(9).	**DAS:** The DT50 values, both laboratory and field, were calculated using first-order kinetics and non-linear regression analysis.	The listing of endpoints has been amended.	PRAPeR 17 (19. – 23.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	Open point 4.4 LoEP soil adsorption/desorption to be updated to state there is no clear pH dependence of soil adsorption. As the final RMS, UK and EFSA (see comment at line 4 (15)) conclusion is there is no clear evidence of pH dependance, RMS to to consider stating this position in a corrigendum or amended DAR. See reporting table 4(13).	**DAS:** Noted	The listing of endpoints has been amended.	PRAPeR 17 (19. – 23.03.2007): Open point fulfilled.
	Open point 4.5 RMS to add the second longer whole system single first order DT50 of 838 days to the endpoints sheet with an indication that the value is an uncertain estimate extrapolated significantly beyond the end of the study See reporting table 4(24).	**DAS:** Noted	The listing of endpoints has been amended.	PRAPeR 17 (19. – 23.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
4.1	Data requirement FOCUSsw simulations at step 3 and 4 to be repeated for a single application for each intended use as these simulations are expected to give the highest PECsw concentrations appropriate for the short term risk assessment to free living aquatic organisms. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(29).	**DAS:** Noted	The new simulations are included in the addendum.	PRAPeR 17 (19. – 23.03.2007): Data requirement fulfilled.
4.2	Data requirement FOCUSsw simulations (step 4) to be repeated for the multiple application pattern for each crop of the intended use to account for potential accumulation from use in successive years as outlined in section 8.7.3 page 217 of SANCO/4802/2001 rev.2 final (May 2003), as these simulations are expected to give the PECsw concentrations appropriate	**DAS:** Noted	The new calculations are included in the addendum.	PRAPeR 17 (19. – 23.03.2007): Data requirement fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	for assessing the long term risk assessment to free living aquatic organisms and will give the highest PECsediment required to complete the sediment dweller risk assessment. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(31).			
	Open point 4.6 RMS to prepare an addendum to clarify: - the kinetic formation fraction that was used in the PECgw calculation for myclobutanil butyric acid. - the butyric acid DT50 for each of the 4 soils at experimental and then FOCUS reference conditions with the normalisation calculations used explained. - what the difference in the input values (application timing and crop interception) used to produce the 'realistic case and worst case' results	**DAS:** Noted	The DAR has been updated.	PRAPeR 17 (19. – 23.03.2007): Open point fulfilled. (see data requirement 4.3)

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	reported were. See reporting table 4(32).			
4.3	Data requirement Applicant to provide new groundwater modelling for myclobutanil and myclobutanil butyric acid ensuring the FOCUS reference condition DT50 for myclobutanil butyric acid is correctly calculated in line with FOCUS guidance (the EFSA calculated this DT50 to be 15.6 days) and the formation fraction of butyric acid from myclobuanil used in modelling is clearly reported and reflects FOCUS guidance. Modelling to use FOCUS PEARL in addition to FOCUS PELMO or FOCUS PRZM. The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 4(33).	**DAS:** Noted	The new PEC calculations are included in the addendum	PRAPeR 17 (19. – 23.03.2007): Data requirement maintained Derivation of normalized field DT50 values employed need to be transparently presented. PEC GW need to be recalculated with appropriate kinetic formation fractions for metabolite myclobutanil butyric acid. The new modelling should use the correct normalized DT50 values for metabolite myclobutanil butyric acid. Two FOCUS models (following the EFSA PPR panel Opinion) should be used with the appropriate input parameters. For myclobutanil butyric acid if Kd is used 1/n should be 1 and not 0.9.
	New open point 4.7:			PRAPeR 17 (19. – 23.03.2007):

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	RMS to amend the list of end points according to the discussion table			Open point open.

REPORT OF PRAPeR EXPERT MEETING 18

MYCLOBUTANIL

Rapporteur Member State: BE

Specific comments on the active substance in the section

5. Ecotoxicology

are already listed in the relevant reporting table. Comments submitted for this meeting are listed below.

1. Comments submitted for this meeting:

Date	Supplier	File Name
none		

2. Documents submitted for meeting:

Date	Supplier	File Name
none		

3. Documents tabled at the meeting:

Date	Supplier	File Name
none		

The conclusions of the meeting were as follows:

4. Data on preparations: Systane 20 EW

5. Classification and labelling: N R50/53

10. Recommended restrictions/conditions for use: None proposed

11. Reference list: not discussed

Areas of concern: Mitigation for aquatic organisms for all uses. Possible endocrine disruption for aquatic organisms/birds/mammals.

Appendix 1: Discussion table: MYCLOBUTANIL

Appendix 2: Evaluation table

Appendix 1: Discussion Table, myclobutanil (Fu)

5. Ecotoxicology

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.1 The issue of risk to birds and mammals from intake of contaminated drinking water is still under debate and will be further addressed in the revised Guidance document. For the mean time it is proposed that issue is discussed in the experts' meeting. See reporting table 5(2).	This was discussed in previous meetings and it was agreed to calculate acute TER for birds and mammals. In this case for the a.s. it was above the trigger value (calculated by EFSA as a check). Open point fulfilled.	Open point fulfilled.
	Open point 5.2 RMS to clarify how the residue unit value (RUD) of 22.8 in the refinement was derived and to calculate a long-term TER for mammals for the use of myclobutanil in apples with 2 applications during flowering (65%	The RUD of 22.8 = 30 % of 76 taking account of 70% interception which was already included in the DAR. A new calculation of long-term TER for mammals was included in the updated DAR of March 2007. In this calculation only 2 applications with interception of 35 and 30% respectively was taken into account and the MAF used was for 2 applications. The meeting agreed the RMS should recalculate the TERs with 4 applications and interception factor of 65% and 70%. This will however not change the outcome of the risk assessment. The open point remains open.	The open point remains open.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	interception) and 2 applications at a stage when foliage is developed (70% interception) in an addendum. See reporting table 5(3).		
	Open point 5.3 To be discussed in an expert's meeting if the endpoint values for acute and short term should be corrected for the low content of a.s. For the evaluated uses the outcome of the risk assessment would not be changed. See reporting table 5(4).	The reported endpoints were corrected for purity and results are reported as mg as/kg bw/day. The meeting agreed to this since the purity of the technical material used in the acute and dietary studies with birds was low. Open point fulfilled.	Open point fulfilled..

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
5.1	Data requirement: Notifier to calculate the E_rC_{50} from the study with *Scenedesmus subspicatus* (Ellgehausen, 1987). The applicant has indicated that the data have been sent to the RMS (December 2006). See reporting table 5(7).	The E_rC_{50} has been included in updated DAR and in the LoEP. Data requirement fulfilled.	Data requirement fulfilled.
	Open point 5.4 Experts' meeting to discuss whether a BCF study is necessary See reporting table 5(10).	An argumentation from the applicant was submitted in a position paper. The phys/chem meeting concluded that the Pow is above 3. The meeting noted that as the Pow was above the trigger value and the a.s. was to be applied 4 times pr growth seasons. It appeared to be difficult to predict the low Pow and both chronic and repeated exposure would be expected. For those reasons the meeting agreed for a BCF study in fish. Open point fulfilled. New data gap. Notifier to provide a BCF study in fish.	Open point fulfilled. New data gap identified: Notifier to provide a BCF study in fish.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Data gap identified at PRAPeR 18: Notifier to provide a BCF study in fish.		Data gap open
	Open point 5.5 The reporting of the risk assessment for aquatic organisms to be discussed in an experts' meeting. See reporting table 5(11).	The RMS updated the aquatic risk assessment according to the EPCO guideline (September 2005). Open point fulfilled.	Open point fulfilled.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.6 The use of TWA PEC_{sw} in the risk assessment for aquatic organisms to be discussed in an experts' meeting. See reporting table 5(12).	The RMS used a NOEC of 0.2 mg a.s./L from a 21 day flow-through juvenile growth study with rainbow trout. No effects were observed at this concentration which was the highest tested. For Fathead minnow a NOEC of 0.98 mg a.s/L for growth was determined in a 35 day flow through ELS study. The RMS suggested to use of TWA PECsw for the chronic risk assessment as is justified according to SANCO/3268/2001. The meeting noted that the time to onset of effects was not evident (especially for Daphnia) and the time window on which the TWA should be calculated was not easy to determine. Based on this the meeting agreed that the risk assessment should be recalculated by the RMS based on the initial PEC value. For fish, the majority of the meeting was of the opinion that the NOEC of 0.2 mg a.s./L for rainbow trout should be used since this was the most sensitive species in the acute tests. Open point remains open.	Open point remains open.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.7 MS to discuss the risk to sediment dwelling organisms with focus on • Conversion of NOEC water to NOEC sediment • Use of mean NOEC value (mean of concentration in sediment) • Use of TWA PEC sediment versus plateau level (see comment 4(31) The risk from the representative uses seem to be low, but the assessment should be discussed from a general point of view. See reporting table 5(13).	The risk of myclobutanil to sediment dwelling organisms is based on the NOEC = 4.98 mg a.s./L and max PEC_{SW} initial in the updated DAR of March 2007. In the original DAR the NOEC was recalculated to 6.07 mg/kg at day 0 and 13.97 mg/kg at day 31, in sediment. PECsed from FOCUS step 4 resulted in 13.79 µg/kg (D4 p) in apples and 2.738 µg/kg (D6 d) for apples. The list of endpoints were amended accordingly. The meeting confirmed that the risk for the supported use of the a.s. was low for sediment dwelling organisms. The meeting suggested the RMS to recalculate the TER with the NOEC based on concentration in sediment compared with worst case maximum $PEC_{sediment}$ from FOCUS since 4 applications are foreseen and the substance accumulates in the sediment. Open point remains open.	Open point remains open.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.8 The choice of chronic endpoint for fish to be discussed in an experts' meeting. See reporting table 5(14).	The RMS recalculated the risk assessment with the lowest NOEC of 0.2 mg a.s./L. (highest concentration tested). The meeting agreed to maintain the NOEC of 0.2 mg a.s./L. Open point fulfilled.	Open point fulfilled.
	Open point 5.9 RMS to clarify whether FOCUS modelling using a single application (with the resulting higher spray drift %) did not result in higher global maximum PECsw than the multiple application simulations currently reported, and if necessary to correct the TER calculations using the highest global max values. See reporting table 5(16).	The highest PECsw concentrations should be used for the aquatic risk assessment in the water column. Depending of the outcome of the fate meeting recalculations may need to be redone. Open point remains open.	Open point remains open.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.10 The list of end points has been updated to include worst case scenario and water body type. However, it is proposed to discuss the presentation of the risk assessment for aquatic organisms in an experts' meeting as a general point. See reporting table 5(17).	Refer to open point 5.5. Open point fulfilled.	Open point fulfilled.
	Open point 5.11 The field study conducted with *Typhlodromus pyri* to be discussed in an experts' meeting. See reporting table 5(23).	The meeting agreed that the study can be considered as acceptable. Open point fulfilled.	Open point fulfilled.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.12 The risk to NTA to be discussed in an experts' meeting and in particular the need for further studies with crop relevant species. See reporting table 5(24).	The meeting concluded that the information provided was sufficient. Open point fulfilled.	Open point fulfilled.
	Open point 5.13 The suitability of the litter bag study by Mallet (2004) to address the risk to OM breakdown to be discussed in an experts meeting. See reporting table 5(29).	The RMS included a statement in the update of the DAR (March 2007). The meeting agreed that the first litter bag study should not be considered valid as test substance was not measured. The second study could be considered valid as test material was measured. Open point fulfilled.	Open point fulfilled.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 5.14 The issue of potential for endocrine disruption and whether further studies should be required (e.g. fish full life cycle study) to be discussed in an experts' meeting. The risk to mammals should be revisited following the outcome of the discussions in the section mammalian toxicology. See reporting table 5(42).	The meeting raised some concerns on the lack of guidance on how to assess possible endocrine disruption. The meeting noted that for the intended use exposure to the aquatic environment could not be excluded. For mammals the NOEL is 16 mg/kg/day from a reproduction study in rat could be derived. For mammals the meeting agreed to await the outcome of the tox meeting on evidence of possible endocrine mechanism and a threshold can be derived for possible effects for endocrine disruption. With this information the ecotox will consider how to extrapolate to birds and the aquatic environment. The meeting agreed that additional information on a.s. should be provided by the notifier to address the possible risk for endocrine disruption. Open point remains open.	Open point remains open.

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
5.2	Data requirement: Applicant to submit information to address Annex II point 8 (vi). The applicant has indicated that the information will be submitted to the RMS by end of December 2006 See reporting table 5(43).	The notifier submitted some information but it was considered as incomplete by the RMS. We have information on 3 of the 10 batches used in the ecotox package. The notifier is requested to submit the information on the remaining 7 batches. Data requirement remains open.	Data requirement remains open.
	Message from PRAPeR 16: Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.	The meeting would like to know if there is any biological information on the two isomers. In the worst case the toxicity would be likely increased in maximum 2 fold if the racemic mixture is 50/50 in the test material used in the ecotox tests.	

	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Message from PRAPeR 16: Originally in the DAR there was a calculated octanol water partition coefficient however it was pointed out by Germany that if you used a different modelling method the value was above three. The question that needs to be answered is now there is a new actual test result and do you need to rely on this or without the study have you already concluded the partition co-efficient is greater than 3.	Refer to open point 5.4	

Appendix 2: Evaluation table

5. Ecotoxicology

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	Section 5 Data requirements: ***2*** Open points: ***14***			Section 5 Data requirements: ***1*** Data gaps: ***1*** Open points: ***5***
	Open point 5.1 The issue of risk to birds and mammals from intake of contaminated drinking water is still under debate and will be further addressed in the revised Guidance document. For the mean time it is proposed that issue is dicussed in the experts' meeting. See reporting table 5(2).	**DAS:** Noted that this point is still under debate.	**RMS (February 2007) :** No comment.	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
	Open point 5.2 RMS to clarify how the residue unit value (RUD) of 22.8 in the refinement was derived and to calculate a long-term TER for mammals for the use of myclobutanil in apples with 2 applications	**DAS:** we confirm the RMS explanation in the "comments received on reporting table" at 5(3).	**RMS (February 2007) :** RUD = 22.8 = 30 % of 76 (clearly stated in the DAR) The refined long-term risk assessment for mammals will be presented in update March 2007 of VOL3(B9).	PRAPeR 18 (19. – 23.03.2007): Open point still open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	during flowering (65% interception) and 2 applications at a stage when foliage is developed (70% interception) in an addendum. See reporting table 5(3).			
	Open point 5.3 To be discussed in an expert's meeting if the endpoint values for acute and short term should be corrected for the low content of a.s. For the evaluated uses the outcome of the risk assessment would not be changed. See reporting table 5(4).	**DAS:** Oral and dietary doses were calculated based on the 84.5% purity of the technical material. Therefore the reported doses are corrected for purity and results are reported as mg as/L. This makes them applicable to any risk assessment situation irrespective of technical specification	**RMS (February 2007) :** RMS agrees with the statement of the notifier, considering the endpoints : LD_{50} = 510 mg a.s./kg b.w. LC_{50} > 567 mg a.s./kg b.w./day LC_{50} > 1544 mg a.s./kg b.w./day and the acceptable TER values. For the evaluated uses the outcome of the risk assessment would not be changed.	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
5.1	Data requirement: Notifier to calculate the E_rC_{50} from the study with *Scenedesmus subspicatus* (Ellgehausen, 1987). The applicant has indicated that the data have been sent to the RMS (December	**DAS:** the calculated ErC50 from the study with *Scenedesmus subspicatus* (Ellgehausen, 1987) is available. Growth rate was calculated for the periods of 0-72 and 0-96 hours using mean cells/mL for each treatment and for the pooled control. **Linear regression was used to calculate the ErC50 values based on nominal concentrations which were 7.5 mg/L for 72-hours and 6.7 mg/L for**	**RMS (February 2007) :** The endpoints for E_rC_{50} are added in update March 2007 of VOL3(B9).	PRAPeR 18 (19. – 23.03.2007): Data requirement fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	2006). See reporting table 5(7).	**96-hours.**		
	Open point 5.4 Experts' meeting to discuss whether a BCF study is necessary See reporting table 5(10).	**DAS:** the Notifier prepared the following position Document based on the Guidance Document on Aquatic Ecotoxicology (SANCO/3268/2001 rev.4 (final) 17 October 2002: "*Risk Assessments for Myclobutanil Considering Potential Log Kow and BCF Values*", (sent to the RMS in December 2006). With this Risk Assessment it has been shown that even with the predicted log Kow of 3.50, the BCF for myclobutanil is likely to be <100. Therefore, a BCF study with fish is not triggered. Risk assessments show acceptable risk to fish and fish-consuming birds and mammals using the BCF calculated from a predicted log Kow of 3.50. Risk assessments also show acceptable risk to fish and fish-consuming birds and mammals even in the unlikely case that the BCF is 1000 when myclobutanil is used according to the proposed application rates. There is no concern for biomagnification in aquatic food chains according to triggers defined in the Guidance Document on Aquatic Ecotoxicology. Given the positive results of these extreme worst-case risk assessments, a BCF study with myclobutanil is not necessary.	**RMS (February 2007) :** The experimentally determined log P_{OW} value = 2.56, the calculated log P_{OW} value = 2.89 and the modelled log P_{OW} value = 3.50 the newly experimentally determined log P_{OW} value = 3.17 Very likely the log P_{OW} is around 3 and it is up to the meeting to decide whether a BCF study is required.	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled. Data gap identified: Notifier to provide a BCF study in fish.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
		The complete document is attached to the Evaluation Table as word file: **Appendix I** to Evaluation Table **section 5** As reported at point 1(7) of the Reporting Table a new log Pow test will be conducted using shake flask method and including information on phase separation. The report will be available by the **end of February 2007**.		
5.3	Data gap identified at PRAPeR 18: Notifier to provide a BCF study in fish.			PRAPeR 18 (19. – 23.03.2007): Data gap open
	Open point 5.5 The reporting of the risk assessment for aquatic organisms to be discussed in an experts' meeting. See reporting table 5(11).	**DAS:** Noted	**RMS (February 2007) :** The aquatic risk assessment is reported according to EPCO No E 4, revision 4 (September 2005) manual in update March 2007 of VOL3(B9).	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
	Open point 5.6 The use of TWA PEC_{sw} in the risk assessment for aquatic organisms to be discussed in an experts' meeting.	**DAS:** The risk assessments presented in the dossier clearly show that the results for FOCUS steps 1 and 2 do not pass the risk assessments. Therefore, Step 3 and 4 mitigations are needed. FOCUS methodology stipulates different buffer	**RMS (February 2007) :** The use of TWA PEC_{SW} for the chronic risk assessment is justified according to SANCO/3268/2001. There was an unrealistic exposure	PRAPeR 18 (19. – 23.03.2007): Open point still open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	See reporting table 5(12).	zones for different water bodies as part of the standard FOCUS procedures. Please refer to FOCUS guidance for information. The use of time weighted average concentration for the chronic TER calculations is appropriate since the fathead minnow test was conducted as a flow-through test the Daphnia chronic test was a static-renewal test. In each instance the measured concentrations were >80% of the nominal concentrations during the tests and the toxicity values were based on nominal concentrations. The time to onset of effects for each study was the entire study period since the NOEC for the fathead test was based on final fish length and the NOEC for the Daphnia test was based on reproduction over the entire test period.	regime in the relevant toxicity tests : *O. mykiss* : 21 d flow-through *D. magna* : 21 d semi-static	
	Open point 5.7 MS to discuss the risk to sediment dwelling organisms with focus on • Conversion of NOEC water to NOEC sediment • Use of mean NOEC value (mean of concentration in sediment) • Use of TWA PEC sediment versus plateau level (see comment 4(31)	**DAS:** The risk assessment prepared by DAS in the dossier for the exposure of sediment dwelling organisms has been performed by comparing the chronic NOEC value of *Chironomus riparius* with the global maximum predicted environmental concentration in surface water. In this instance the PECsw is used instead of the PEC_{SED} because the test design for the chironomid 31-day chronic test used a water dose and not a sediment dose. The RMS converted the NOEC based on the water dose level of	**RMS (February 2007) :** The risk of myclobutanil to sediment dwelling organisms is based on the NOEC = 4.98 mg a.s./L and max PEC_{SW} initial. The corrections are made in update March 2007 of VOL3(B9) and in the List of Endpoints.	PRAPeR 18 (19. – 23.03.2007): Open point still open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	The risk from the representative uses seem to be low, but the assessment should be discussed from a general point of view. See reporting table 5(13).	5 mg a.s./L to the equivalent measured TWA of the sediment concentration, 10 mg a.s./kg. The TWA was used because the sediment concentration varied over the duration of the study, as one would expect in a water-dosed system. Comparing this value to the comparable TWA PEC is appropriate, as this PEC simulates a similar exposure pathway, that is, water "dosed" by spray drift deposition followed by partitioning to bed sediment. Both approaches in the risk assessment, either comparing global max. PECsw to the NOEC expressed in mg/L, or comparing TWA PECsed to the TWA NOEC expressed in mg/kg, demonstrate safe use.		
	Open point 5.8 The choice of chronic endpoint for fish to be discussed in an experts' meeting. See reporting table 5(14).	**DAS:** Noted	**RMS (February 2007) :** NOEC (*O. mykiss*, 21 d) = 0.2 mg a.s./L NOEC (*P. promelas*, 35 d) = 0.98 mg a.s./L The choice of the chronic endpoint for fish will not alter the risk assessment.	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
	Open point 5.9 RMS to clarify whether FOCUS modelling using a single application (with the resulting higher spray drift %) did not result in higher global maximum PECsw than the multiple application	**DAS:** The data for the single application scenario have been sent to the RMS (December 2006), see Data Requirement 4.1.	**RMS (February 2007) :** The PEC_{SW} and PEC_{SED} for single application pattern have been calculated considering the assumptions used for the previous PEC calculations. Considering the very high uncertainty related to the FOCUS PEC surface water	PRAPeR 18 (19. – 23.03.2007): Open point still open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	simulations currently reported, and if necessary to correct the TER calculations using the highest global max values. See reporting table 5(16).		simulations, the results of both PEC calculations (single or multiple applications) are similar. We consider therefore that it is more appropriate to base the TER calculations on the PEC multiple applications. Moreover, the risk assessment shows that the risk for aquatic organisms is acceptable with rather easily feasible mitigations measures (short buffer zones).	
	Open point 5.10 The list of end points has been updated to include worst case scenario and water body type. However, it is proposed to discuss the presentation of the risk assessment for aquatic organisms in an experts' meeting as a general point. See reporting table 5(17).	**DAS:** Noted	**RMS (February 2007) :** Please refer to open point 5.5.	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
	Open point 5.11 The field study conducted with *Typhlodromus pyri* to be discussed in an experts' meeting. See reporting table 5(23).	**DAS:** the RMS acknowledges low PREDATORY mite populations at the beginning of the study and that populations increased during the study until the start of autumn when the mite population fell into a natural period of seasonal decline. Low numbers are normal for mite populations in field trials	**RMS (February 2007) :** Indeed, mite populations were low at start but increased during the study for the untreated control. We consider that the study is valid (n° of replicates, observation on the predatory mites and spider mites). Moreover, this study has been	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
		started in the spring. Populations are not static. Population numbers were similar for all treatments during the respective sampling dates. The PREDATORY mite numbers were sufficient for evaluation. Predatory mite populations in the positive control were never greater than in the untreated controls during the study. Prior to the 5th application there was 66.5% negative effect on the positive control mites and the effect increased to 88.5% 4 weeks after the last application. This is not poor performance by propineb. PEST spider mite populations are low in the study in the control treatment. In the toxic reference plots the PEST mites were high in mid summer and remained high until the end of the trial. These Pest mites are prey for the PREDATORY mites studied in this trial. The reason for the increase and high occurrence of PEST mites in the toxic reference treatment was due to the adverse effects on the PREDATORY mites leading to reduced predation. We consider the study is valid and reliable.	performed at the application rate of 9 x 90 g a.s./ha and 9 x 180 g a.s./ha, while the maximum application rate in apple is 4 x 90 g a.s./ha.	
	Open point 5.12 The risk to NTA to be discussed in an experts' meeting and in particular the need for further studies with crop relevant species.	**DAS:** Extended laboratory and field studies on the sensitive species *A. rhopalosiphi, T. pyri and C. carnea* indicate acceptable risk at rates ≥3x the annual field rate for orchards. The *C. septempunctata* study, when interpreted in the guidance of ESCORT 2	**RMS (February 2007) :** Please refer to update March 2007 of VOL3(B9).	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	See reporting table 5(24).	does not indicate risk to NTAs at the rate of 36 g a.s./ha tested. In the study a correct mortality for ladybird larvae of 11.9% was observed, which is below the ESCORT 2 trigger of 50% effects. In the reproduction phase of the study, females in the control groups produced a mean of 6.46 eggs/female whereas in the Systhane treatment females produced a slightly lower number of 4.07 eggs/female. In effect terms this is equal to a 37% reduction compared to the control, which is below the ESCORT 2 trigger. In terms of hatching rate both treatments were similar. Due to high species-inherent variability it is now the custom to perform only a qualitative assessment of reproductive effects and it is the position of DAS that exposure to Systhane did not affect the reproductive performance of *C. septempunctata* and no further evaluation is necessary. The potential risk to crop relevant species has been sufficiently addressed by studies with *C. septempunctata* and *C. carnea*. Together with the other valid higher tier studies with the sensitive indicator species *T. pyri* and *A. rhopalosiphi* it is the position of DAS that the risk to non-target arthropods has been fully considered and addresses the risk assessment requirement for the Annex I listing of myclobutanil.		

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
	Open point 5.13 The suitability of the litter bag study by Mallet (2004) to address the risk to OM breakdown to be discussed in an experts meeting. See reporting table 5(29).	**DAS:** The first study was not considered valid because soils were not measured for the test substance to confirm exposure and the study was based on an obsolete guideline. The second study followed the EPFES 2002 Guideline which does not require a positive control, but which does require residue analysis to confirm exposure. Test substance concentrations were measured in the second study and the values confirmed proper dosing following the Guideline recommendations. The dossier presents risk assessments based on the litterbag studies	**RMS (February 2007) :** Please refer to update March 2007 of VOL3(B9).	PRAPeR 18 (19. – 23.03.2007): Open point fulfilled.
	Open point 5.14 The issue of potential for endocrine disruption and whether further studies should be required (e.g. fish full life cycle study) to be discussed in an experts' meeting. The risk to mammals should be revisited following the outcome of the discussions in the section mammalian toxicology. See reporting table 5(42).	**DAS:** we agree with the statement in column 3 of the reporting table. Also, Results from acute and chronic studies of the effects of myclobutanil on birds, mammals, terrestrial invertebrates and aquatic organisms do not indicate endocrine disruption. Risk assessments indicate acceptable risk to non-target species groups with proper mitigation. Therefore, the risk of endocrine disruption from residues of myclobutanil is also acceptable.	**RMS (February 2007) :** The possible endocrine effects are taken into consideration by the reproduction studies in setting a NOEC. Therefore we consider that this issue is addressed.	PRAPeR 18 (19. – 23.03.2007): Open point still open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the evaluation group
5.2	Data requirement: Applicant to submit information to address Annex II point 8 (vi). The applicant has indicated that the information will be submitted to the RMS by end of December 2006 See reporting table 5(43).	**DAS:** the available information was sent to RMS on January 8th 2007.	**RMS (February 2007) :** Please refer to addendum VOL4(C1-C2) of March 2007.	PRAPeR 18 (19. – 23.03.2007): Data requirement still open.

Report of PRAPeR Expert MEETING 19

MYCLOBUTANIL

Rapporteur Member State: BE

Specific comments on the active substance in the section

2. Mammalian Toxicology

are already listed in the relevant reporting table. Comments submitted for this meeting are listed below.

1. Comments submitted for this meeting:

Date	Supplier	File Name
none		

2. Documents submitted for meeting:

Date	Supplier	File Name
none		

3. Documents tabled at the meeting:

Date	Supplier	File Name
none		

The conclusions of the meeting were as follows:

4. **Data on preparations:** Systhane 20 EW

5. **Classification and labelling:** R 22,R 36, R63

6. **Recommended restrictions/conditions for use:** none proposed

7. **Reference List:** not discussed

Areas of concern: metabolites (decision pending) bridging information missing

Appendix 1: Discussion table: MYCLOBUTANIL

Appendix 2: Evaluation table

Appendix 1: Discussion Table, myclobutanil (Fu)

2. Mammalian toxicology

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
2.1	Data requirement (for formal reasons) Applicant to submit the new acute toxicity package. [This should be regarded as a technical data requirement since the data have already been submitted to the RMS.] See reporting table 2(1).	The information has been submitted and has been summarized in the addendum. The RMS proposed not to take this information into account. Compared with the previous source the new source has a different level of purity. It is unclear whether the manufacturing process was changed. The results of the acute studies show lower toxicity. It is not clear whether the effects are related to the substance itself or the impurities. The previous source was proposed to be classified with X,n; R22, which does not apply any longer for the new source. The meeting decided to consider only the source with the lower purity. The RMS required evidence of comparability if the notifier would like to have the new submitted studies considered. A data gap was proposed: Information on the comparability of the toxicological studies performed with technical material of different purity is required, as well a toxicological information on impurities	Data requirement fulfilled.
2.5	Data gap identified at PRAPeR 19: Information on the comparability of the toxicological studies performed with technical material of different purity is required, as well a		Data gap open.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	toxicological information on impurities		
	Open point 2.1 RMS to assess and confirm the equivalence of the tox tested batches to the proposed technical specification. See reporting table 2(1).	See above. The equivalence can not be assessed. Open point open.	Open point open.
	Open point 2.2 The need of classification R36 “Irritating to eyes” to be discussed in an experts’ meeting See reporting table 2(2).	Based on the information available classification would not be necessary. However, ECB has already classified the substance with R36. Open point fulfilled.	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.3 The relevance of liver effects in the 90-day and 1-year studies in dog to be discussed in an experts' meeting. See reporting table 2(7).	The notifier submitted a position paper on this point, which is available in the addendum. In relation to the effects it was discussed what is and adverse effects and what could be considered as adaptive effect. The two studies have been performed with different batches with different levels of purity. The liver weight increases between 9 and 52% in the short term study. In this 90 d dog study the liver enzymes are not affected up to 1600 ppm although the liver weight increased. (In long term studies the liver is not the target organ.) In both studies reduced body weight gain and decrease of food intake were observed at the highest dose levels (1600 ppm). Taking into account the increased organ weight together with histological alterations (hepatocyte hypertrophy) at the level of 200 ppm in the 90 d dog study the meeting proposed to set the NOAEL at 10 ppm for the 90 d dog study and a NOAEL of 100 ppm for the 1 y dog study. An overall subchronic NOAEL of 100 ppm was proposed. The liver enzymes are decreased.	Open point fulfilled. An overall subchronic NOAEL of 100 ppm was proposed (90 d and 1 y dog)
	Open point 2.4 Reproductive and developmental toxicity to be discussed in an experts' meeting See reporting table 2(12).	The classification was discussed based on comments made by MSs with regard to the effects observed in the 2 generation rat study. It has been discussed whether the results, observed at high dose levels justify classification with R62. Findings in the testes at highest dose tested (1000 ppm) may be linked to aromatase inhibition. A decreased number of females delivering litters was as well observed at the highest dose level tested. Systemic toxicity was observed at 200 ppm. The meeting agreed that these findings do not warrant the classification with R 62.	Open point fulfilled. The meeting agreed that these findings do not warrant the classification with R 62.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.5 The issue of triazole metabolite is going to be discussed in a dedicated experts' meeting. Conclusions to be awaited. See reporting table 2(17).	The point is related to TA occurring in wheat grain. The notifier has withdrawn the use from the list of the intended uses. Therefore the open point was closed.	Open point closed. The notifier has withdrawn the use from the list of the intended uses.
2.2	Data requirement (for formal reasons) The applicant should provide a case and/or data to show that the increased levels of both impurities (3 and 8) will not have a significant adverse effect on the toxicity of technical Myclobutanil [This should be regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 2(21) and 1(4) in section 1.	Both impurities are present in the "old" batches, as well as in the "new" batches. Their amounts are increased as explained by the RMS, although the purity of the active substance increased. The RMS explained that these impurities showing up in higher amounts were not considered of toxicological concern. From the confidential part of the DAR it is evident that the increase of the impurities was reported for the technical specification of a purity of 92,5% compared to the batches with a lower purity. So far the meeting only considered the "old" batches with a lower purity, which varies from 79 – 93% The purity of the batches used in the new acute toxicity studies is 95,7%. No information is available on the impact of the impurities with regard to the toxicological parameters. The meeting discussed the acceptability of the QSAR model.	

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.6 The relevance of impurities 3 and 8 to be discussed in an experts' meeting See reporting table 2(21).	Open point open (see new data gap next to data requirement 2.1)	Open point open.
	Open point 2.7 The relevance of metabolites RH-9090 (M4) and RH-9083 (M3) to be discussed in a meeting of experts. See reporting table 2(22).	The metabolites M2, M4 and M3 are major rat metabolites (>10%) The meeting agreed on the relevance, because of the parent toxicological properties. Their equivalent toxicity is not proven but it can be presumed they are in the same range of toxicity. It was discussed whether the toxicity observed is more related to the metabolites or related to the parent. Information on the amounts of the metabolites occurring in the residues is needed. Therefore, confirmation from the meeting on residues is required. The residue meeting informed about the residue levels. It is RMS opinion that toxicological studies performed with the parent compound covers the toxicology of both metabolites. Taking into account the estimated consumer exposure via the residues in relation to their amount in the rat metabolism it was agreed that they do not pose any concern. Open point fulfilled.	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
2.3	Data requirement Applicant to provide further information on health effects/surveillance programmes in manufacturing plant personnel In the comments to the reporting table the applicant announced that a report covering medical surveillance in a manufacturing plant in Italy (2000-20005) was sent to the RMS. See reporting table 2(23).	The information is available and was presented in the addendum. Data requirement fulfilled.	Data requirement fulfilled.
	Open point 2.8 AOEL to be discussed in an experts' meeting. See reporting table 2(24).	The AOEL is based on the overall NOAEL (90 d and 1y dog) of 3.09 mg/kg bw/day, resulting in an AOEL of 0.03 mg/kg bw/day with a safety factor of 100. Open point fulfilled	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.9 The ArfD to be discussed in an experts' meeting. See reporting table 2(27).	The ARfD is based on the developmental toxcicity study in rats with a NOAEL of 31.1 mg/kg bw/day resulting in 0.31 mg/kg bw/day with a safety factor of 100. Open point fulfilled.	Open point fulfilled.
	Open point 2.10 RMS to provide details on the existing classification of co-formulants and their impact on the classification of the preparation. See reporting table 2(30).	The classification and labelling of co-formulants and their impact on their impact on the classification of the preparation is not relevant for the PRAPeR expert meeting. This should be dealt with at MS level. Open point closed.	Open point closed.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.11 Dermal absorption to be discussed in an experts' meeting. See reporting table 2(31).	The dermal absorption values proposed are: 18% for the concentrate 30% for the dilution Based on the in vivo rat study, as reported in the list of end points. Two in vivo rat studies are available and the RMS calculated the dermal absorption, because the conclusions from the notifier didn't seem to be clear. A new in vitro study with rat and human skin was submitted and the results are available in the addendum. A correction factor was not seen necessary for the concentrate, but for the dilution a correction factor of 2.7 was established. Leading to a dermal absorption value of 11% for the dilution. A recalculation of the values has been done during the meeting because the faecal excretion has not been considered in the first calculation. The revised values are: 25%for the concentrate 15% for the dilution. The meeting agreed. Open point fulfilled.	Open point fulfilled. The revised values for dermal absorption are: 25%for the concentrate 15% for the dilution.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
2.4	Data requirement (for formal reasons) Applicant to submit the new *in vitro* dermal study. [This should be regarded as a technical data requirement since the study has already been submitted.] See reporting table 2(35).	The study was submitted and the evaluation is available in the addendum and was taken into consideration deriving the dermal absorption values. Open point fulfilled.	Data requirement fulfilled.
	Open point 2.12 Input parameters for exposure assessment to be confirmed in an experts' meeting. See reporting table 2(41).	A new proposal is available in the addendum. The exposure has to be re-calculated taking into account the values agreed during this meeting (reference values, dermal absorption) Open point open.	Open point open.
	Open point 2.13 Bystander exposure to be discussed in an experts' meeting. See reporting table 2(43).	The exposure has to be re-calculated taking into account the values agreed during this meeting (reference values, dermal absorption) Open point open.	Open point open.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 2.14 Worker exposure to be discussed in an experts' meeting. See reporting table 2(44).	The exposure has to be re-calculated taking into account the values agreed during this meeting (reference values, dermal absorption) Open point open.	Open point open.
	Message from phys-chem to tox: Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.	A statement was submitted by the notifier. The racemic mixture consists of two possible optic isomers in the ration 50:50. This has not specifically considered. Provided the racemic mixture is stable the concern is covered by the tests performed.	A statement was submitted by the notifier. The racemic mixture consists of two possible optic isomers in the ration 50:50. This has not specifically considered. Provided the racemic mixture is stable the concern is covered by the tests performed.

Appendix 2: Evaluation table

2. Mammalian Toxicology

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Section 2 Data requirements: ***4*** Open points: ***14***			Section 2 Data requirements: ***1*** Data gaps: ***1*** Open points: ***5***
2.1	Data requirement (for formal reasons) Applicant to submit the new ac toxicity package. [This should be regarded as a technical data requirement since the data have already been submitted to the RMS.] See reporting table 2(1).	**DAS:** Noted	See addendum. The data requirement can be closed.	PRAPeR 19 (26. – 30.03.2007): Data requirement fulfilled.
2.5	Data gap identified at PRAPeR 19: Information on the comparability of the toxicological studies performed with technical material of different purity is required, as well a toxicological information on			PRAPeR 19 (26. – 30.03.2007): Data gap open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	impurities.			
	Open point 2.1 RMS to assess and confirm the equivalence of the tox tested batches to the proposed technical specification. See reporting table 2(1).	**DAS: The purity of the batches used for the Acute Toxicity Studies is 95.1 % and not 99.7% as confirmed by the relevant Certificate of Analysis included in the reports.** By mistake it was indicated by DAS in the submitted comment the purity of the reference standard instead of the technical material used. We confirm the batch used for the studies was originated by the actual source of tech. myclobutanil, KemFine. The validity of the reports and the relevant impact on the classification of the technical active substance should be revised taking into account this new context. A brief summary of the Acute toxicity package is included as attachment to the Evaluation Table as word file: **Appendix IV** to Evaluation Table section 2	RMS proposes not to take this new package (summarized in the addendum) into account as the results of acute toxicity obtained with this new source present a lesser hazard compared to the reference source. A high increase in purity (from 84% up to 95.1%) could affect the complete toxicology profile of the active ingredient and acute toxicity studies are not sufficient to address the hazard of myclobutanil taking into account the reproduction/developmental toxicity profile of this compound. Further assessment of equivalence is considered necessary before to amend the proposed classsification. This point could be closed.	PRAPeR 19 (26. – 30.03.2007): Open point open.
	Open point 2.2 The need of classification R36 “Irritating to eyes” to be discussed in an experts’ meeting See reporting table 2(2).	**DAS:** taking into consideration DAS comment at 2(1) and on the basis of the new acute toxicity data, myclobutanil should not be classified for acute toxicity. The low incidence and severity of the eye irritation at 21 days may indicate that classification is not required, and this is further supported by the new eye irritation	RMS agrees.	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
		study in which only mild irritation was observed.		
	Open point 2.3 The relevance of liver effects in the 90-day and 1-year studies in dog to be discussed in an experts' meeting. See reporting table 2(7).	**DAS:** our comments are expressed in the document *"Position Document in response to EFSA/MSs comments (Reporting Table) on the Myclobutanil DAR"* point point 1) Effects in dog Livers, attached to the Evaluation Table as word file: **Appendix I** to Evaluation Table section 2 The same document was addressed to the attention of RMS on September 7th, 2006.	The *"Position Document in response to EFSA/MSs comments (Reporting Table) on the Myclobutanil DAR"* point point 1) Effects in dog Livers, supports RMS proposal and is included in the addendum.	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled. An overall subchronic NOAEL of 100 ppm was proposed (90 d and 1 y dog)
	Open point 2.4 Reproductive and developmental toxicity to be discussed in an experts' meeting See reporting table 2(12).	**DAS:** our comments are expressed in the document "*Myclobutanil reprotox position paper*" attached to the Evaluation Table as word file: **Appendix III** to Evaluation Table section 2 The same document was addressed to the attention of RMS on May 30th, 2006.	No comments	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled. The meeting agreed that these findings do not warrant the classification with R 62.
	Open point 2.5 The issue of triazole metabolite is going to be discussed in a dedicated experts' meeting. Conclusions to be awaited. See reporting table 2(17).	**DAS:** the toxicity studies on metabolites were supplied only for completion of information. TA occurs in wheat grain that we confirm is not an intended/defended use for myclobutanil. The conclusions of the dedicated expert meeting therefore have no direct relevance for the evaluation of myclobutanil.	No comments	PRAPeR 19 (26. – 30.03.2007): Open point closed. The notifier has withdrawn the use from the list of the intended uses.
2.2	Data requirement (for formal reasons)	**DAS:** Noted	No comments	

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	The applicant should provide a case and/or data to show that the increased levels of both impurities (3 and 8) will not have a significant adverse effect on the toxicity of technical Myclobutanil [This should be regarded as a technical data requirement since the data have been already submitted to the RMS] See reporting table 2(21) and 1(4) in section 1.			
	Open point 2.6 The relevance of impurities 3 and 8 to be discussed in an experts' meeting See reporting table 2(21).	**DAS:** Noted	No comments	PRAPeR 19 (26. – 30.03.2007): Open point open.
	Open point 2.7 The relevance of metabolites RH-9090 (M4) and RH-9083 (M3) to be discussed in a meeting of experts. See reporting table 2(22).	**DAS:** both metabolites are rat metabolites and therefore no additional studies are required. Please amend RH-9083 to RH-9089.	RMS agrees. This point can be closed.	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
2.3	Data requirement Applicant to provide further information on health effects/surveillance programmes in manufacturing plant personnel In the comments to the reporting table the applicant announced that a report covering medical surveillance in a manufacturing plant in Italy (2000-20005) was sent to the RMS. See reporting table 2(23).	**DAS:** we confirm the report was sent to the RMS (November 29th, 2006)	RMS included the information in the addendum. The point can be closed.	PRAPeR 19 (26. – 30.03.2007): Data requirement fulfilled.
	Open point 2.8 AOEL to be discussed in an experts' meeting. See reporting table 2(24).	**DAS**: In accordance with the current GAP for Systhane 20EW, a maximum of 4 applications can be made, during the fruit development season. The NOAEL should reflect adverse effects which are expected to occur during this time-frame. In summary, the 2-generation study NOAEL, with a safety factor of 100 gives an AOEL value of 0.16 mg/kg bw/day. The critical subchronic effects observed were hepatocellular changes in the 1-year dog study (following 1-year of exposure only) and reproduction effects in the 2-	The comment of the company (included in the addendum) supports the RMS proposal.	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
		generation rat study. 90-D dog study NOAEL: 56.8 mg/kg bw/day. 1-Yr dog study NOAEL: 14.28 mg/kg bw/day. 2-Gen study NOAEL: 16 mg/kg bw/day. In the 1-year dog study, changes in ALT were observed from the Week 25 clinical chemistry sample time-point but they did not worsen with increased exposure duration. As the adverse effects (hepatocytes ballooning) in the dog were only seen after one year at 1600 ppm, and not before 3 months (maximum exposure window), the NOAEL from the 2-generation study is appropriate to use for AOEL setting, and would adequately protect against any hepatic or testicular effects of concern. The use of the 1-year NOAEL from the 2-year chronic rat study is inappropriate as the duration of exposure far exceeds that expected from use of the product. The LOAEL for the testicular effects was 39.2 mg/kg bw/day at 1-year. Similar effects at the 1-year NOAEL of 9.8 mg/kg bw/day were not observed until the 2-year time-point. The 2-generation reproduction study provides a >2-fold margin of safety compared to the 1-year LOAEL. The appropriate safety factor for setting the AOEL is 100, as there is no		

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
		justification for using a greater value. The testicular effect is an effect produced from prolonged exposure with a clear NOAEL, and a worker is not going to be exposed to myclobutanil persistently in order for any adverse effects to occur. The 3-month toxicity study in the rat did not show any testicular effects up to and including doses of 585 mg/kg bw/day. The severity of this chronic effect does not warrant an additional safety factor. **In addition**, please refer to the document *"Position Document in response to EFSA/MSs comments (Reporting Table) on the Myclobutanil DAR"* point 2) Setting the AOEL, attached to the Evaluation Table as word file: **Appendix I** to Evaluation Table section 2 The same document was addressed to the attention of RMS on September 7th, 2006.		
	Open point 2.9 The ArfD to be discussed in an experts' meeting. See reporting table 2(27).	**DAS:** our comments are expressed in the document *"Position Document in response to EFSA/MSs comments (Reporting Table) on the Myclobutanil DAR"* point 4) ARfD Setting, attached to the Evaluation Table as word file: **Appendix I** to Evaluation Table section 2 The same document was addressed to the attention of RMS on September 7th, 2006.	The position paper (included in the addendum) of the company supports the RMS proposal.	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled.
	Open point 2.10	**DAS:** about R65, is assigned when:	RMS considers that classification of	PRAPeR 19 (26. – 30.03.2007):

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	RMS to provide details on the existing classification of co-formulants and their impact on the classification of the preparation. See reporting table 2(30).	Liquid substances and preparations presenting an aspiration hazard in humans because of their low viscosity: (a) for substances and preparations containing aliphatic, alicyclic and aromatic hydrocarbons in a total concentration equal to or greater than 10 % and having either: - a flow time of less than 30 sec. in a 3 mm ISO cup according to ISO 2431, or - a kinematic viscosity measured by a calibrated glass capillary viscometer in accordance with ISO 3104/3105 of less than 7 mm2/sec. at 40 °C, or - a kinematic viscosity derived from measurements of rotational viscometry in accordance with ISO 3219 of less than 7 mm2/sec. at 40 °C. Note that substances and preparations meeting these criteria need not be classified if they have a mean surface tension greater than 33 mN/m at 25 °C as measured by the du Nouy tensiometer or by the test methods shown in Annex V, Part A.5; (b) for substances and preparations, based on practical experience in humans. Systhane 20EW has a high viscosity and surface tension therefore R65 is not triggered under any of the above criteria. About R66	co-formulants and their impact on the classification of the preparation is not relevant for a Praper meeting. This discussion should be forwarded to ECB (ISPRA) where specialists are involved with classification and labelling. This point could be closed.	Open point closed. The classification and labelling of co-formulants and their impact on their impact on the classification of the preparation is not relevant for the PRAPeR expert meeting.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
		For substances and preparations which may cause concern as a result of skin dryness, flaking or cracking but which do not meet the criteria for R38 based on either: . practical observation after normal handling and use, or . relevant evidence concerning their predicted effects on the skin. This phrase is assigned not on study results but on practical evidence; Systhane 20 EW has been extensively used in the past and in the present with no adverse effects reported. We consider that R66 would not be appropriate.		
	Open point 2.11 Dermal absorption to be discussed in an experts' meeting. See reporting table 2(31).		No comments	PRAPeR 19 (26. – 30.03.2007): Open point fulfilled. The revised values for dermal absorption are: 25%for the concentrate 15% for the dilution.
2.4	Data requirement (for formal reasons) Applicant to submit the new *in vitro* dermal study.	**DAS:** Noted	The new study is summarized in the addendum. Appropriate values were used in the new operator exposure assessment reported in the	PRAPeR 19 (26. – 30.03.2007): Data requirement fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	[This should be regarded as a technical data requirement since the study has already been submitted.] See reporting table 2(35).		addendum. This point could be closed.	
	Open point 2.12 Input parameters for exposure assessment to be confirmed in an experts' meeting. See reporting table 2(41).	**DAS:** please refer to the update of the operator exposure sent to the attention of RMS on September 20th, 2006. The mentioned document is attached to the Evaluation Table as word file: **Appendix II** to Evaluation Table section 2	A new proposal is reported in the addendum.	PRAPeR 19 (26. – 30.03.2007): Open point open.
	Open point 2.13 Bystander exposure to be discussed in an experts' meeting. See reporting table 2(43).	**DAS:** please refer to the update of the operator exposure sent to the attention of RMS on September 20th, 2006. The mentioned document is attached to the Evaluation Table as word file: **Appendix II** to Evaluation Table section 2	A new proposal is reported in the addendum.	PRAPeR 19 (26. – 30.03.2007): Open point open.
	Open point 2.14 Worker exposure to be discussed in an experts' meeting. See reporting table 2(44).	**DAS:** please refer to the update of the operator exposure sent to the attention of RMS on September 20th, 2006. The mentioned document is attached to the Evaluation Table as word file: **Appendix II** to Evaluation Table section 2	A new proposal is reported in the addendum.	PRAPeR 19 (26. – 30.03.2007): Open point open.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Message from phys-chem to tox: Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.			A statement was submitted by the notifier. The racemic mixture consists of two possible optic isomers in the ration 50:50. This has not specifically considered. Provided the racemic mixture is stable the concern is covered by the tests performed.

REPORT OF PRAPeR EXPERT MEETING 20

MYCLOBUTANIL

Rapporteur Member State: BE

Specific comments on the active substance in the section

3. Residues

are already listed in the relevant reporting table. Comments submitted for this meeting are listed below.

1. Comments submitted for this meeting:

Date	Supplier	File Name
none		

2. Documents submitted for meeting:

Date	Supplier	File Name
none		

3. Documents tabled at the meeting:

Date	Supplier	File Name
none	Name	

The conclusions of the meeting were as follows:

4. **Data on preparations:** XXX

5. **Classification and labelling:** not relevant.

6. **Recommended restrictions/conditions for use:** Use is only acceptable for permanent crops as rotational crops are not addressed by data. As there is a data gap for animal metabolism, fruit pomace from treated crops must not be feed to animals.

7. **Reference List:** not discussed.

Areas of concern: The isomer ratio needs to be addressed. Consumer exposure from food of animal origin is currently not concluded on.

Appendix 1: Discussion table: MYCLOBUTANIL

Appendix 2: Evaluation table

Appendix 1: Discussion Table, myclobutanil (Fu)

3. Residues

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 3.1 RMS to present clarification on apple metabolism given in column 3 in an addendum See reporting table 3(3).	Clarifications on the apple metabolism study were provided in the Addendum to the DAR (March 2007). No changes from the previous results (residue level and degradation pattern). The metabolism is considered sufficiently investigated. Open point closed	Open point 3.1 fulfilled. Clarifications provided in the Addendum to the DAR (February 2007)
	Open point 3.2 The study 'Laboratory metabolism studies of 14C RH-3866 in wheat' by Nelson, S.S. (1984) is considered as not acceptable for evaluation by RMS. This should be highlighted in a revised DAR/addendum/corrigendum as appropriate, and the list of references relied upon in the DAR as well the list of information, tests and studies considered relied upon should be	The study 'Laboratory metabolism studies of ^{14}C RH-3866 in wheat' by Nelson, S.S. (1984) on wheat is available and gives indication of the metabolic pathway. The meeting considers the study as not reliable and complete. The study has been deleted from the list of studies relied upon. (see Addendum March 2007) The open point is fulfilled.	Open point 3.2 fulfilled. The study has been deleted from the list of studies relied upon.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	amended accordingly. See reporting table 3(5).		
	Open point 3.3 RMS to provide the missing TRR values for the wheat metabolism study in an addendum See reporting table 3(6).	TRR were not provided. The meeting considers the study 'Laboratory metabolism studies of ^{14}C RH-3866 in wheat' by Nelson, S.S. (1984) as no reliable and complete. (see also Open point 3.2 above) Open point closed	Open point 3.3 fulfilled. The study has been deleted from the list of studies relied upon.
	Open point 3.4 As recently concerns have been raised on the toxicological relevance of the triazole derivate metabolites (teratogenic and/or embryotoxic resp.) these aspect needs prudent consideration even if the use on cereals is currently not notified as a representative use (but may be in future on MS level) As this metabolites are not specific to myclobutanil but to all triazole pesticides, a	The wheat metabolism study featured triazole derivate metabolites, but wheat is not a representative use. These metabolites are not specific to Myclobutanil, but to all triazole pesticides. A first proposal how to generally consider triazole derivate compounds in consumer risk assessment was discussed in the PRAPeR experts' meetings in January 2007. Based on the myclobutanil metabolism studies available on fruits and cereals categories, it is concluded that the metabolism is not comparable in the two crop groups. Specifically, triazole derivate metabolites were found in the wheat metabolism study. While triazole derivate metabolites were not found in the apples and grapes metabolism studies. As metabolism studies are available on grapes and apples, it is considered that the broad category of fruit crop is sufficiently covered. A general residue definition covering all crops categories can not be proposed based on	Open point 3.4 fulfilled. A general discussion of the triazole derivate metabolites issue took place in round 3 of PRAPeR meetings. For myclobutanil: If in the future new uses other than fruits and cereals will be envisaged new metabolism studies might be necessary to address triazole derivate metabolites.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	general solution with support of the toxicology meeting could be discussed in an experts' meeting See reporting table 3(7).	the available data. It was concluded that if in the future new uses other than fruits and cereals will be envisaged new metabolism studies might be necessary to particularly address potential occurrence of triazole derivate metabolites in those crops. Open point closed	
	Open point 3.5 Updated list of studies relied upon to be provided as a clear indication of which of the available studies are considered acceptable and reliable for evaluation of the residue behaviour of myclobutanil See reporting table 3(9).	The meeting noted that the updated list of studies relied upon was included in the Addendum to the DAR (March 2007) One grape study was deleted from the list without consequences. Even if wheat is not a representative use, the wheat study (Streelman, 1984) was submitted, evaluated and considered complete. Furthermore, this study is included in the list of studies relied upon as it is used to conclude that the metabolism of Myclobutanil is different in different crop categories. Open point fulfilled.	Open point 3.5 fulfilled. The updated list of studies relied upon was included in the Addendum to the DAR (March 2007)
	Open point 3.6 Information on the	The meeting noted that the information on the radioactive purity and the specific activity of the test substance has been provided in the Addendum to the DAR (March 2007).	Open point 3.6 fulfilled. Information has been provided in

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	radioactive purity and the specific activity of the test substance to be provided in an addendum See reporting table 3(10).	The NOT has submitted the statement that the residue testing is performed on the mixture of the optical isomers. However, the batch used in the residue studies were not analysed for the ratio of isomers. Open point closed	the Addendum to the DAR (March 2007).
	Open point 3.7 RMS to present clarification on grape metabolism following a foliar treatment given in column 3 in an addendum See reporting table 3(11).	Clarifications on grape metabolism following a foliar treatment have been reported in the Addendum (March 2007). No new data are add to the addendum. The extraction procedures are sufficiently described. The rate of identification of metabolites was considered satisfactory. Open point fulfilled.	Open point 3.7 fulfilled. Information has been provided in the Addendum to the DAR (March 2007).
	Open point 3.8 RMS to give clarification on apple metabolism study with regard to extractability and attempts to release, characterise and identify the non extractable residues in an addendum See reporting table 3(12).	Clarification on apple metabolism study with regard to extractability and attempts to release, characterise and identify the non extractable residues was reported in the addendum (March 2007). The point is considered sufficiently addressed. See open point 3.1. Open point fulfilled.	Open point 3.8 fulfilled. Information has been provided in the Addendum to the DAR (March 2007).

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 3.9 RMS to present clarification on metabolism in laying hens given in column 3 in an addendum See reporting table 3(16).	Clarifying information on the metabolism study in laying hens has been provided in the in the addendum (March 2007). It is recalled that this metabolism study is not required. However it has been evaluated. After its evaluation, the meeting concluded that the metabolism study is considered acceptable. Although, some uncertainties are present (mainly lack of extractability values, quantification of metabolites in fat). Even thought parent was labelled on the phenyl ring, no metabolites missing the triazole ring were identified and the rate of identification was high. If triazole metabolites would have been generated than to a very low extent (following a minor pathway…). This is confirmed by the similar results obtained with the triazole labelled metabolites. From a qualitative point of view, the metabolism study in poultry is considered sufficiently investigated. That is the parent and two metabolites (the alcohol-RH-9090 and the ketone-RH-9089) are likely to be the predominant components of the residue definition. Any contribution from the triazole metabolites will need to be considered additionally, if relevant. The meeting concluded that the residue definition in poultry products for RA can not be proposed. This is because the representative uses are not relevant to poultry and because the composition of the residues in the poultry diet is currently not known. The metabolism study should not be reported on the list of studies to be relied on. Open point closed	Open point 3.9 fulfilled. Information has been provided in the Addendum to the DAR (March 2007), however this metabolism study is not required and should not be reported on the list of studies to be relied on.
	Open point 3.10	The ruminant metabolism study was conducted with a mixture of myclobutanil and plant	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Clarifying information on the metabolism study in cows addressing comments 3(19)-1 to 3(19)-7 to be presented in an addendum See reporting table 3(19).	metabolites. Myclobutanil was labelled on the phenyl ring and the metabolites on the triazole ring. The ratio of compounds in the dose does not reflect that which occurs in fruit pomace but it could be accepted as the picture is unlikely to have been different. The identification of residues was in general low (circa 50 %). The meeting of experts agreed that the level of identification was insufficient and a robust residue definition for risk assessment and monitoring could not be concluded on. Open point closed New data gap: a ruminant metabolism study is required where the compound is labelled on both rings. The other points were not discussed as a new study is required.	New data gap: A ruminant metabolism study is required where the compound is labelled on both rings.
	Data gap identified at PRAPeR 20: A ruminant metabolism study is required where the compound is labelled on both rings.		Data gap open.
	Open point 3.11 Clarifying information on the metabolism study in hens to be presented in an addendum. See reporting table 3(20).	The clarification was given in the addendum and the study was accepted. But is not relied on for the representative uses.	Open point fulfilled. Information has been provided in the Addendum to the DAR (March 2007), however this metabolism study is not required and should not be reported on the list of studies to be relied on.
	Open point 3.12 Proposed residue definition for food of animal origin and consideration of whether or not MRLs	Open point closed for hen. Open point still open for ruminants see open point 3(10)	Open point fulfilled for hen. Open point still open for ruminants

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	might be needed to be presented in an addendum Justification for the resepective proposals should be given, taking into account open point in 3(24) in terms of MRL proposlas and comments in 3(25) and 3(30) in terms of relevance of metabolites (potential of toxicity and/or fat solubility) See reporting table 3(21).		
	Open point 3.13 RMS to elaborate on the changed proposal for the residues definition for risk assessment (myclobutanil + RH 9090) in an addendum; consideration should be also given to a potential inclusion of RH-9089 depending on its toxicological relevance See reporting table 3(22).	Open point closed - see open point 3.16. For the fruit uses RH-9089 was not included as it is not a significant component of the residue.	Open point closed

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 3.14 RMS to elaborate on the question of whether the available metabolism study in cows can be used to derive a metabolic pathway and to confidently propose a residue definition in ruminants, respectively, in an addendum See reporting table 3(23).	Open point closed - see data requirement under 3(10).	Open point closed See new data gap for a ruminant metabolism study.
	Open point 3.15 RMS to verify the residue levels occurring in liver and milk of cows at the 1x dose rate in order to decide on necessity of MRL proposals See reporting table 3(24).	Open point still open. MRLs are likely to be necessary but this issue is not concluded on.	Open point still open. MRLs are likely to be necessary. See new data gap for a ruminant metabolism study.
	Open point 3.16 Inlcusion of RH-9090 in the residue definition for risk assessment triggers re-evaluation	For fruit crops the residue definition is myclobutanil for monitoring and for risk assessment myclobutanil, RH-9090 free and conjugated expressed as myclobutanil. A conversion factor could not be concluded on. Open point fulfilled. New data gap: the applicant should provide evidence that the submitted trials cover this	Open point fulfilled. New data gap: The applicant

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	of residue data relevant for consumer intake assessment and assessment of livestock dietary burden (STMR, HR) Revised calculations to be presented in an addendum In that context it should be checked whether sufficient data on RH-9090 are available for risk assessment purposes (e.g. storage stability data, validated analytical data generation methods, processing data) To be reported in an addendum. See reporting table 3(27).	residue definition in particular with regard to conjugates. It should be demonstrated that the method used would extract all the conjugate and that the hydrolysis step in the method gives an acceptable yield.	should provide evidence that the submitted trials cover the residue definition for risk assessment in particular with regard to conjugates. It should be demonstrated that the method used would extract all the conjugate and that the hydrolysis step in the method gives an acceptable yield.
3.3	Data gap identified at PRAPeR 20: The applicant should provide evidence that the submitted trials cover the residue definition for risk assessment in particular with regard to conjugates. It should		Data gap open.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	be demonstrated that the method used would extract all the conjugate and that the hydrolysis step in the method gives an acceptable yield.		
	Open point 3.17 Results of trials additionally accepted as valid by RMS to be presented in an addendum Note: If higher residues occur at a later PHI than 14, these residues values have to be considered in the risk assessment. RMS to review residue data accordingly See reporting table 3(31).	The residue data base for apples should be reconsidered to take in to account higher residues at longer PHIs. If this would lead to a need for a new risk assessment then this should be conducted. Open point still open.	Open point still open. The residue data base for apples should be reconsidered accordingly.
	Open point 3.18 Results of trials additionally accepted as valid by RMS to be presented in an addendum Note: If higher residues occur at a later PHI	The residue data base for grapes should be reconsidered to take in to account higher residues at longer PHIs. If this would lead to a need for a new risk assessment then this should be conducted. Open point still open.	Open point still open. The residue data base for grapes should be reconsidered accordingly.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	than 14, these residues values have to be considered in the risk assessment. RMS to review residue data accordingly See reporting table 3(33).		
3.1	Data requirement Studies simulating representative processing conditions to be submitted by the applicant. This study should investigate the behaviour of the relevant residue (potentially including relevant metabolites) on crops to be processed. The notifier indicated that a study will be conducted and the final report will be available by June 2007 See reporting table 3(37).	A new study will be performed the applicant has stated that it will be available in June 2007. Data requirement is still open.	Data requirement is still open.
	Open point 3.19	These results are for juice and puree and not pomace and therefore should no be included	Open point fulfilled.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Addendum on transfer /processing factors is awaited. Note: The discrepancy observed in terms of the apple pomace processing factors is easily explained by the fact that the factors 0.55 and 0.646 refer to apple puree rather than to apple pomace. (refer to p.16 and p.29 of the report) Why is a residue study with a higher application rate not eligible to derive a processing factor? A sound argument should be provided for that decision. However, final conclusion on processing is pending the outcome of the study on the effects on the nature of residues (data requirement) See reporting table 3(38).	in the intake calculation for ruminants. Open point fulfilled. See also open point 3.20	Processing factors in question are for juice and puree and not pomace.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	Open point 3.20 Recalculation of livestock dietary burden under consideration of the relevant residues for risk assessment and valid processing factors to be presented in an addendum Upon that recalculation the comparison to the dose rates in feeding studies and an estimation of potential residues in food of animal origin to be redone See reporting table 3(41).	Open point still open - see open point 3.19	Open point still open Livestock dietary burden needs to be recalculated in accordance with the agreements of the meeting.
	Open point 3.21 RMS to specify what “out of any toxicological relevance” means (as toxic as myclobutanil?) See reporting table 3(42).	This was only significant for the 4-OH-3-lactone metabolite in ruminant metabolism and there is a new data requirement for a ruminant study therefore this open point is closed.	Open point fulfilled. See new data gap for a ruminant metabolism study.
	Open point 3.22 While in metabolism study the diol	In the feeding study the compound was misnamed and it should have been the diol. A GLP amendment do the study should be made. New data gap: a GLP amendment is required for the animal feeding study to address the	Open point fulfilled. New data gap: A GLP amendment is required for the

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	metabolite RH294 was identified as a major metabolite, in the feeding study the carboxylic acid RH294 was anaylsed for. RMS to give further clarification on that issue. See reporting table 3(42).	reference to the carboxylic acid	animal feeding study to address the reference to the carboxylic acid.
	Open point 3.23 Given the long-life of myclobutanil residues in soil it should be checked with F&B section whether generation of soil metabolites that have not been found in plant metabolism may occur (e.g. trialzoles), and thus a potential uptake/accumulation of this compounds in plants following a repeated application (year by year) of myclobutanil might be expected The statement in the DAR concerning the	In the soil no triazole metabolites were formed (in a 2 years study) but it can not be concluded that they will not be formed from continuous use of this compound and there may be uptake of these compounds. It will therefore be necessary to mention this issue in the EFSA conclusion. The formed myclobutanil butyric acid was only at low levels and is not a residue concern for fruit crops. However it was noted that it leaches to ground water at significant levels and therefore a consumer exposure assessment (and possibly risk assessment) should be conducted for this. Open point still open. New open point: a consumer exposure assessment should be conducted for the myclobutanil butyric acid metabolite in ground water potentially used as drinking water.	Open point still open. New open point: A consumer exposure assessment should be conducted for the myclobutanil butyric acid metabolite in ground water potentially used as drinking water.

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	DT90 and non-requirement of studies is wrong and thus confusing and should be corrected in a revised DAR/corrigendum/addendum See reporting table 3(44).		
	New open point 3.28: A consumer exposure assessment should be conducted for the myclobutanil butyric acid metabolite in ground water potentially used as drinking water.		Open point open.
	Open point 3.24 RMS to present recalculation of NESTI under consideration of the relevant residues for risk assessment in an addendum The addendum should include details on the calculations of the HR-P/ STMR-P values used in the NESTI calculations. See reporting table	Open point still open pending on the conjugate issue with the residue trials.	Open point still open

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	3(46).		
	Open point 3.25 Procedural recoveries have to be at least 70%. In the light of that information RMS to review and report acceptable storage stability data in an addendum See reporting table 3(47).	There were acceptable recoveries in other commodities that cover fruit and it could be concluded that residues of myclobutanil and RH-9090 (the stability of RH-9090 conjugates are addressed by the stability of RH-9090) are stable for at least 36 months. Open point fulfilled.	Open point fulfilled. I could be concluded that residues of myclobutanil and RH-9090 are stable for at least 36 months.
	Open point 3.26 RMS to revise list of end points to reflect the respective STMR and HR values for the individual updated [as proposed in open points in 3(31) & 3(33)] data sets for N-EU and S-EU. The more critical data set is the one for N-EU. See reporting table 3(51).	Open point closed - covered in a new open point on the end points.	Open point closed. See new open point on list of endpoints.
	Open point 3.27 RMS to present recalculation of chronic	Open point still open pending the conjugate issue with the residue trials.	Open point still open

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
	intakes under consideration of the relevant residues for risk assessment and revised residue endpoints in an addendum See reporting table 3(53).		
	Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.	New data gap: the applicant should address the risk assessment with regard to the isomers. The concern was that if one isomer is causing all the toxic effects then in a worst case situation where the residue is the toxic isomer the tox end points could be reduced by a factor of 2 assuming a linear dose response. It is noted that the rapporteur disagreed with this data gap.	New data gap: The applicant should address the risk assessment with regard to the isomers.
3.4	Data gap identified at PRAPeR 20: The applicant should address the risk assessment with regard to the isomers.		Data gap open.
	New open point list of end points	The residue values should be updated taking account of the higher residues at longer PHIs and the STMR and HR values should be updated. The residue definition is only valid for fruit so cereals should be deleted. The residue definition should be amended to include the conjugates of RH-9090. The conversion factor for monitoring to risk assessment should state open. Animals covered should state required for ruminants and the residue definition should be open. Also the comparison of rat to ruminant should read open. Open for animal matrices. The intake assessment will need to be amended and it should be noted that exposure from food of animal origin is not covered.	New open point: List of end points to be updated in accordance with the agreements of the meeting

No.	Subject	Discussion Expert Meeting	Conclusions Expert Meeting
		The drinking water risk assessment should be included. The processing factors should be corrected to correct the mistake on naming the processing fractions. The MRL for ruminants should be open.	

Appendix 2: Evaluation table

3. Residues

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	Section 3 Data requirements: ***1*** Open points: ***27***			Section 3 Data requirements: ***1*** Data gaps: ***3*** Open points: ***10***
	Open point 3.1 RMS to present clarification on apple metabolism given in column 3 in an addendum See reporting table 3(3).	**DAS:** Noted	The extraction procedure for apple juice and apple pomace is presented in the Addendum to the DAR – February 2007. RMS agrees that the extractability figures for pomace in the text (DAR) may not be correct (based on the radioactivity level in the chloroform extract but should be based on the total residues recovered in the methanol extracts).	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Clarifications provided in the Addendum to the DAR (February 2007)
	Open point 3.2 The study 'Laboratory metabolism studies of 14C RH-3866 in wheat' by Nelson, S.S. (1984) is considered as not acceptable for evaluation by RMS. This should be highlighted in a revised	**DAS:** Noted	The non reliability of this study was highlighted in the Addendum to the DAR – February 2007. The list of references relied upon in the DAR as well the list of information, tests and studies considered relied upon were amended accordingly.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. The study has been deleted from the list of studies relied upon.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	DAR/addendum/corrigendum as appropriate, and the list of references relied upon in the DAR as well the list of information, tests and studies considered relied upon should be amended accordingly. See reporting table 3(5).			
	Open point 3.3 RMS to provide the missing TRR values for the wheat metabolism study in an addendum See reporting table 3(6).	**DAS:** Noted	The TRR values in the methanol extracts were not provided. Considering the general experimental design, this study is considered as unacceptable.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. The study has been deleted from the list of studies relied upon.
	Open point 3.4 As recently concerns have been raised on the toxicological relevance of the triazole derivate metabolites (teratogenic and/or embryotoxic resp.) these aspect needs prudent consideration even if the use on cereals is currently not notified as a representative	**DAS:** we confirm that cereals are not a representative use. The conclusions of the dedicated expert meeting therefore have no direct relevance for the evaluation of myclobutanil.	This point was discussed in the PRAPeR 15 Expert Meeting. Toxicological end points were determined for the triazole derivate metabolites (Triazole Acetic Acid and Triazole Alanine). These metabolites were identified in the metabolic pathway of Myclobutanil in wheat. Therefore, the proposition should be to include these 2 relevant metabolites in	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. A general discussion of the triazole derivate metabolites issue took place in round 3 of PRAPeR meetings. For myclobutanil: If in the future new uses other than fruits and cereals will be envisaged new metabolism studies might be necessary to address triazole derivate

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	use (but may be in future on MS level) As this metabolites are not specific to myclobutanil but to all triazole pesticides, a general solution with support of the toxicology meeting could be discussed in an experts' meeting See reporting table 3(7).		the definition of the residue for wheat grain both for monitoring and risk assessment. If in the future, cereals become a representative use, the risk assessment will be performed by comparing the residue level of the triazole derivate metabolites to their respective toxicological end points.	metabolites.
	Open point 3.5 Updated list of studies relied upon to be provided as a clear indication of which of the available studies are considered acceptable and reliable for evaluation of the residue behaviour of myclobutanil See reporting table 3(9).	**DAS:** Noted	An updated list of studies relied upon was included in the Addendum to the DAR – February 2007. .	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. The updated list of studies relied upon was included in the Addendum to the DAR (March 2007)
	Open point 3.6 Information on the radioactive purity and the specific activity of the test substance to be provided in an addendum	**DAS:** Noted	These data are presented in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Information has been provided in the

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	See reporting table 3(10).			Addendum to the DAR (March 2007).
	Open point 3.7 RMS to present clarification on grape metabolism following a foliar treatment given in column 3 in an addendum See reporting table 3(11).	**DAS:** Noted	Clarifications on the grape metabolism are presented in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Information has been provided in the Addendum to the DAR (March 2007).
	Open point 3.8 RMS to give clarification on apple metabolism study with regard to extractability and attempts to release, characterise and identify the non extractable residues in an addendum See reporting table 3(12).	**DAS:** Noted	Clarifications on the apple metabolism are presented in the Addendum to the DAR – February 2007 under open point 3.1.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Information has been provided in the Addendum to the DAR (March 2007).
	Open point 3.9 RMS to present clarification on metabolism in laying hens given in column 3 in an addendum	**DAS:** Noted	Clarifications on laying hens metabolism are presented in the Addendum to the DAR – February 2007 under open points 3.9/3.11.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled.

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
	See reporting table 3(16).			Information has been provided in the Addendum to the DAR (March 2007), however this metabolism study is not required and should not be reported on the list of studies to be relied on
	Open point 3.10 Clarifying information on the metabolism study in cows addressing comments 3(19)-1 to 3(19)-7 to be presented in an addendum See reporting table 3(19).	**DAS:** Noted	Clarifications on the metabolism study in cows are presented in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): New data gap: A ruminant metabolism study is required where the compound is labelled on both rings.
3.2	Data gap identified at PRAPeR 20: A ruminant metabolism study is required where the compound is labelled on both rings.			PRAPeR 20 (27. – 30.03.2007): Data gap open.
	Open point 3.11 Clarifying information on the metabolism study in hens to be presented in an addendum. See reporting table 3(20).	**DAS:** Noted	Clarifications on laying hens metabolism are presented in the Addendum to the DAR – February 2007 under open point 3.9/3.11.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Information has been provided in the Addendum to the DAR (March 2007),

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
				however this metabolism study is not required and should not be reported on the list of studies to be relied on
	Open point 3.12 Proposed residue definition for food of animal origin and consideration of whether or not MRLs might be needed to be presented in an addendum Justification for the resepective proposals should be given, taking into account open point in 3(24) in terms of MRL proposlas and comments in 3(25) and 3(30) in terms of relevance of metabolites (potential of toxicity and/or fat solubility) See reporting table 3(21).	**DAS:** There are existing EU MRLs for myclobutanil in commodities of animal origin and they are based on RH-9090 (expressed as myclobutanil equivalents) as the residue definition. It is proposed that a residue definition in commodities be retained to support the existing MRLs even if the residue intake in in livestock based on representative crops is not sufficient to require MRLs. Additionally, it is proposed that a residue definition be established since, even if the dietary burden for the representative crops does not trigger the need for MRLs, crops and associated MRLs considered at a later time will result in the need for a residue definition in livestock commodities.	A) Metabolism studies in laying hens and lactating cows have been provided and can be considered as acceptable (demonstration has been made that the phenethyl triazole linkage was not cleaved and therefore the triazole derivate metabolites are not expected to be recovered in the livestock matrices). B) The residue definition for monitoring and risk assessment is proposed as follows : *Cows* : the metabolite RH-9090 expressed as myclobutanil equivalents. *Poultry* : Myclobutanil + RH-9090 expressed as myclobutanil equivalents. *C) MRLs proposals can be proposed for ruminants matrices only according to the representative uses. A MRL of 0.01* mg/kg is proposed for milk, muscle, fat, liver and*	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled for hen. Open point still open for ruminants

No.	Column A Conclusions of the EFSA Evaluation Meeting	Column B Comments from the main data submitter / applicant on the EFSA Evaluation Meeting conclusion	Column C Rapporteur Member State comments on main data submitter / applicant comments	Column D Recommendations EPCO Expert Meeting / Conclusions of the Evaluation Meeting
			kidney although the DFG S19 analytical method is not suitable for the determination of RH-9090 in fat (mean recovery values were lower than 70 % and RSD values exceeded 20%).	
	Open point 3.13 RMS to elaborate on the changed proposal for the residues definition for risk assessment (myclobutanil + RH 9090) in an addendum; consideration should be also given to a potential inclusion of RH-9089 depending on its toxicological relevance See reporting table 3(22).	**DAS:** Levels of RH-9089 are not significant as stated in the comments from RMS in Column 3 of the Reporting Table at 3(22), 3(26) and 3(27) and from UK in the "Comments received on reporting Table, Section Residues" at 3(26) and 3(27). RH-9089 should not be included in the residue definition.	The metabolites RH-9090 and RH-9089 were recovered in the rat metabolism along with the parent compound and were shown to have a similar toxicity as the parent compound through metabolisation on the side chain of the parent molecule only suggesting a detoxification pattern. Based on the available metabolism studies in grapes and apples, the parent Myclobutanil is the most relevant indicator for enforcement purposes while the metabolite RH-9090 should be included in the residue definition for risk assessment due to its similar toxicity to the parent compound. The metabolite RH-9089 was recovered at a trace level in grapes and apples and therefore it was decided not to include it in the definition of residue for risk assessment.	PRAPeR 20 (27. – 30.03.2007): Open point closed.

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	Open point 3.14 RMS to elaborate on the question of whether the available metabolism study in cows can be used to derive a metabolic pathway and to confidently propose a residue definition in ruminants, respectively, in an addendum See reporting table 3(23).	**DAS:** Noted	RMS agrees that there is no evidence that the metabolites RH-9090 and RH-9089 recovered in the cow metabolism study are degradation products of myclobutanil since these metabolites were also used as test substances. It is also true that the rate of identification in liver and kidney is relatively low (30% and 40 % of TRR, respectively) to assess that the degradation pathway was completely investigated. However, no cleavage of the phenethyl triazole linkage occurred in order to generate the toxicologically relevant triazole derivate metabolites and as it is observed in the rat metabolism, the degradation of myclobutanil took place essentially on the alkyl side chain of the parent molecule to provide exclusively compounds structurally related to myclobutanil. For these reasons, a new metabolism study in lactating cows should not be required.	PRAPeR 20 (27. – 30.03.2007): Open point closed See new data gap for a ruminant metabolism study. (data gap 3.2)
	Open point 3.15 RMS to verify the residue levels occurring in liver and milk of cows at the 1x dose rate in order to decide on	**DAS:** Noted	The calculated dietary burden accounted for 0.311 and 0.945 mg/kg in diet, respectively for dairy and beef cattle (see Addendum to the DAR – February 2007).	PRAPeR 20 (27. – 30.03.2007): Open point still open.

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	necessity of MRL proposals See reporting table 3(24).		The 0.3 x treatment group (0.915 mg/kg in diet) – Table B.7.2.1-2 in DAR showed that the residue levels in liver and milk raised respectively 0.045 mg/kg and 0.008 mg/kg.	MRLs are likely to be necessary. See new data gap for a ruminant metabolism study.
	Open point 3.16 Inlcusion of RH-9090 in the residue definition for risk assessment triggers re-evaluation of residue data relevant for consumer intake assessment and assessment of livestock dietary burden (STMR, HR) Revised calculations to be presented in an addendum In that context it should be checked whether sufficient data on RH-9090 are available for risk assessment purposes (e.g. storage stability data, validated analytical data generation methods, processing data) To be reported in an addendum. See reporting table 3(27).	**DAS:** Noted	All these points were discussed in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. New data gap: The applicant should provide evidence that the submitted trials cover the residue definition for risk assessment in particular with regard to conjugates. It should be demonstrated that the method used would extract all the conjugate and that the hydrolysis step in the method gives an acceptable yield.

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3.3	Data gap identified at PRAPeR 20: The applicant should provide evidence that the submitted trials cover the residue definition for risk assessment in particular with regard to conjugates. It should be demonstrated that the method used would extract all the conjugate and that the hydrolysis step in the method gives an acceptable yield.			PRAPeR 20 (27. – 30.03.2007): Data gap open.
	Open point 3.17 Results of trials additionally accepted as valid by RMS to be presented in an addendum Note: If higher residues occur at a later PHI than 14, these residues values have to be considered in the risk assessment. RMS to review residue data accordingly See reporting table 3(31).	**DAS:** Noted	The residue trials summary sheets are presented in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point still open. The residue data base for apples should be reconsidered accordingly.
	Open point 3.18	**DAS:** Noted	The residue trials summary sheets are	PRAPeR 20 (27. – 30.03.2007):

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	Results of trials additionally accepted as valid by RMS to be presented in an addendum Note: If higher residues occur at a later PHI than 14, these residues values have to be considered in the risk assessment. RMS to review residue data accordingly See reporting table 3(33).		presented in the Addendum to the DAR – February 2007.	Open point still open. The residue data base for grapes should be reconsidered accordingly.
3.1	Data requirement Studies simulating representative processing conditions to be submitted by the applicant. This study should investigate the behaviour of the relevant residue (potentially including relevant metabolites) on crops to be processed. The notifier indicated that a study will be conducted and the final report will be available by June 2007	**DAS:** we confirm the announced deadline of **June 2007.**	RMS notes that further studies are announced for June 2007.	PRAPeR 20 (27. – 30.03.2007): Data requirement still open.

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	See reporting table 3(37).			
	Open point 3.19 Addendum on transfer /processing factors is awaited. Note: The discrepancy observed in terms of the apple pomace processing factors is easily explained by the fact that the factors 0.55 and 0.646 refer to apple puree rather than to apple pomace. (refer to p.16 and p.29 of the report) Why is a residue study with a higher application rate not eligible to derive a processing factor? A sound argument should be provided for that decision. However, final conclusion on processing is pending the outcome of the study on the effects on the nature of residues (data requirement) See reporting table 3(38).	**DAS:** With regard to the acceptability of the trial in which a 5X application rate was used, this higher rate was included in the study in case residues were below the LOQ in some of the processed fractions with the 1X application rate. The concentration factor for pomace is essentially the same in the study for the 1X and 5X application rate, 2.87 and 3.07, respectively. For the discrepancy in the processing factors: indeed the way the data are reported in the older report does not help: the two processed fractions are “Most”, which we translated to juice / cider and “”Mus”, which we translated to pomace, no text in the report explains how the processing was carried out and how the “Mus” was produced and its exact identity / composition so indeed we cannot exclude that the correct translation is “Apple puree” as indicated by EFSA; in this case the results of the transfer factors for Mus in the older study	The transfer factors are presented under open point 3.16 (Table B.7.7.2-1) in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. Processing factors in question are for juice and puree and not pomace.

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		compare reasonably well with the transfer factors for puree in the 2004 study (0.55 and 0.646 in the old study vs. 0.25 for puree in the 2004 study).		
	Open point 3.20 Recalculation of livestock dietary burden under consideration of the relevant residues for risk assessment and valid processing factors to be presented in an addendum Upon that recalculation the comparison to the dose rates in feeding studies and an estimation of potential residues in food of animal origin to be redone See reporting table 3(41).	**DAS:** Noted	A) The livestock dietary burden calculation based on the new residue definition for risk assessment in apples and grapes is presented in the Addendum to the DAR – February 2007 under open point 3.16. B) Considering the maximum dietary intake for beef cattle (0.945 mg/kg diet), the lower dosing group in the cow feeding study can be considered as an over-estimation of around 1.6 fold the actual residue level that may occur in the feeding stuffs. The residue level of the parent myclobutanil, the alcohol RH-9090 and the diol RH-294 are below the LOQ (0.01 mg/kg) of the analytical method in milk and in edible tissues of ruminants (Table B.7.8.1-1 in the DAR).	PRAPeR 20 (27. – 30.03.2007): Open point still open Livestock dietary burden needs to be recalculated in accordance with the agreements of the meeting.
	Open point 3.21 RMS to specify what “out of any toxicological relevance” means (as toxic as myclobutanil?)	**DAS:** Noted	The metabolite 4-hydroxy-3-lactone identified in cow liver and kidney was also recovered in the rat metabolism and is considered to have a similar toxicity as the parent compound.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled.

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	See reporting table 3(42).		This metabolite is “out of any toxicological relevance” since it is covered by all the available toxicological studies performed (see section mam tox).	See new data gap for a ruminant metabolism study. (data gap 3.2)
	Open point 3.22 While in metabolism study the diol metabolite RH294 was identified as a major metabolite, in the feeding study the carboxylic acid RH294 was anaylsed for. RMS to give further clarification on that issue. See reporting table 3(42).	**DAS:** Noted	The metabolite RH-294 is a diol and not a carboxylic acid.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. New data gap: A GLP amendment is required for the animal feeding study to address the reference to the carboxylic acid.
3.4	Data gap identified at PRAPeR 20: A GLP amendment is required for the animal feeding study to address the reference to the carboxylic acid.			PRAPeR 20 (27. – 30.03.2007): Data gap open.
	Open point 3.23 Given the long-life of myclobutanil residues in soil it should be checked with F&B	**DAS:** The only soil metabolite found at >5% was β-4-chlorophenyl-β-cyano-γ-(1H-1,2,4-triazole)butyric acid (referred to as the	Clarifications and a corrected statement are given in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point still open.

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	section whether generation of soil metabolites that have not been found in plant metabolism may occur (e.g. trialzoles), and thus a potential uptake/accumulation of this compounds in plants following a repeated application (year by year) of myclobutanil might be expected The statement in the DAR concerning the DT90 and non-requirement of studies is wrong and thus confusing and should be corrected in a revised DAR/corrigendum/addendum See reporting table 3(44).	"butyric acid") which reached ca 6%. No other soil metabolites, including1,2,4-triazole, were seen. Regarding the myclobutanil soil DT90, the statement in the DAR should be corrected as the long DT90 values would normally trigger crop rotation studies. However, as has been noted previously, the planting of succeeding crops is not relevant in this case since both apples and grapes are long-lived crops that are not grown in rotation with other succeeding crops.		New open point: A consumer exposure assessment should be conducted for the myclobutanil butyric acid metabolite in ground water potentially used as drinking water.
	New open point 3.28: A consumer exposure assessment should be conducted for the myclobutanil butyric acid metabolite in ground water potentially used as drinking water.			PRAPeR 20 (27. – 30.03.2007): Open point open.

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	Open point 3.24 RMS to present recalculation of NESTI under consideration of the relevant residues for risk assessment in an addendum The addendum should include details on the calculations of the HR-P/ STMR-P values used in the NESTI calculations. See reporting table 3(46).	**DAS:** Noted	RMS presented a recalculation of the short term dietary risk assessment in the Addendum to the DAR – February 2007 under open point 3.16.	PRAPeR 20 (27. – 30.03.2007): Open point still open.
	Open point 3.25 Procedural recoveries have to be at least 70%. In the light of that information RMS to review and report acceptable storage stability data in an addendum See reporting table 3(47).	As was pointed out, the procedural recoveries for the 24 month time points for both the myclobutanil and the RH-9090 in almond hulls are just below 70% (67.1% and 66.5%, respectively). The 12 month procedural recoveries are at 66.3% for the RH-9090 in the almond hulls; but then at 18 months the procedural recoveries are again acceptable at 71.3% for the RH-9090 in the almond hulls. Recoveries are slightly low but are relatively consistent at each individual time point. The procedural recovery for the 24 month time point for the RH-9090 in	A conclusion regarding the storage stability of Myclobutanil and RH-9090 in almond hulls and meat is provided in the Addendum to the DAR – February 2007.	PRAPeR 20 (27. – 30.03.2007): Open point fulfilled. I could be concluded that residues of myclobutanil and RH-9090 are stable for at least 36 months.

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		almond meat is below 70% (at 59.9%). The 18 month the procedural recovery for the myclobutanil in almond meat is 127% which exceeds the acceptability range and is out of line with the procedural recoveries obtained before and after that time point. However, recoveries are still relatively consistent at each individual time point. The method seems to give relatively consistent recoveries at each individual time point, but it does not work very consistently from one time point to the next. When the procedural recoveries are high so are the aged recoveries, and when the procedural recoveries are low then so are the aged recoveries. The recoveries for the aged samples vary in parallel with the procedural recoveries but that there is some inconsistency in the functionality of the method at different time points. When the procedural recoveries are used to correct the recoveries for the aged samples, the aged samples do not show any significant decline out to the 24 month time point and they are very consistent after correction. This supports the stability of myclobutanil and the RH-9090 out to 24 months.		

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	Open point 3.26 RMS to revise list of end points to reflect the respective STMR and HR values for the individual updated [as proposed in open points in 3(31) & 3(33)] data sets for N-EU and S-EU. The more critical data set is the one for N-EU. See reporting table 3(51).	**DAS:** Noted	These new acceptable data will be included in the updated version of the LoEPs.	PRAPeR 20 (27. – 30.03.2007): Open point closed. see new open point 3.29
	Open point 3.27 RMS to present recalculation of chronic intakes under consideration of the relevant residues for risk assessment and revised residue endpoints in an addendum See reporting table 3(53).	**DAS:** Noted	RMS presented a recalculation of the chronic dietary risk assessment in the Addendum to the DAR – February 2007 under open point 3.16.	PRAPeR 20 (27. – 30.03.2007): Open point still open.
	Message to tox, residues, fate and ecotox that the technical material is a racemic mixture and has this been considered in the risk assessment.			PRAPeR 20 (27. – 30.03.2007): New data gap: The applicant should address the risk assessment with regard to the isomers.

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	Data gap identified at PRAPeR 20: The applicant should address the risk assessment with regard to the isomers.			PRAPeR 20 (27. – 30.03.2007): Data gap open.
	New open point 3.29: RMS to amend the list of end points as indicated in the discussion table.			PRAPeR 20 (27. – 30.03.2007): Open point open.