# REGISTRATION REPORT <br> Part A <br> Risk Management 

# Product code: MON 79351 <br> Product name: ROUNDUP INNOVERT 

Chemical active substance:
glyphosate, $480 \mathrm{~g} / \mathrm{L}$

Southern Zone
Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE
(New application after re-registration)

## Applicant: MONSANTO S.A.S

Date: 04/05/2023
Updated version:

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## PART A <br> RISK MANAGEMENT

## 1 Details of the application

The company MONSANTO S.A.S has requested a marketing authorisation in France for the product ROUNDUP INNOVERT (formulation code: MON 79351), $480 \mathrm{~g} / \mathrm{L}$ glyphosate ${ }^{1}$ as a herbicide for professional uses.

Appendix 1 of this document provides a copy of the product authorisation.
Appendix 2 of this document contains a copy of the product label (draft as proposed by the applicant).

### 1.1 Application background

The present registration report concerns the evaluation of MONSANTO S.A.S application submitted on 29/01/2018 to market ROUNDUP INNOVERT in France (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the re-registration of authorisation after the renewal of approval of the active substance Glyphosate of this product in France and in other Member States (MSs) of the Southern zone. The updated version concerns the evaluation of new data submitted by MONSANTO S.A.S on 07/01/2021 for the Physical and chemical section (relevant impurity) and the Toxicology section (genotoxic potential) (application 20203345).

The present application (2018-0462) was evaluated in France by the French Agency for Food, Environmental and Occupational Health \& Safety (Anses), according to the Regulation (EC) no $1107 / 2009^{2}$, the implementing regulations, and French regulations. This application was assessed in the context of the zonal procedure for all MSs of the Southern zone, taking into account the worst-case uses ("risk envelope approach")". When risk mitigation measures were necessary, they are adapted to the situation in France.

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

This part A of the RR presents a summary of essential scientific points upon which recommendations are based and is not intended to show the assessment in detail. The risk assessment conclusions provided in this document are based on the information, data and assessments provided in the Registration Report, Part

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B Sections 1-10 and Part C, and where appropriate the addendum for France.
The conclusions on the acceptability of risk are based on the criteria provided in Regulation (EU) No 546/20114 , and are expressed as "acceptable" or "not acceptable" in accordance with those criteria.

This document also describes the specific conditions of use and labelling required for France for the registration of ROUNDUP INNOVERT.

### 1.2 Letters of Access

The applicant has provided letters of access for active substance. These letters of access are available upon request.

### 1.3 Justification for submission of tests and studies

According to the applicant: "Any new studies submitted in this application are those necessary for the evaluation of the product but not previously evaluated during Annex I renewal of the active substance or during zonal / MS registration of MON 79351."

### 1.4 Data protection claims

Where protection for data is being claimed for information supporting registration of ROUNDUP INNOVERT (MON 79351), it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7. Details of the authorisation decision

## $1.5 \quad$ Product identity

| Product code | MON 79351 |
| :--- | :--- |
| Product name in MS | ROUNDUP INNOVERT |
| Authorisation number | N/A : no marketing authorisation granted |
| Kind of use | Professional use |
| Low risk product (article 47) | No |
| Function | Herbicide |
| Applicant | MONSANTO S.A.S |
| Active substance(s) <br> (incl. content $)$ | glyphosate, $480 \mathrm{~g} / \mathrm{L}$ |
| Formulation type | Soluble concentrate [SL] |
| Packaging | HDPE $5(1 \mathrm{~L}, 5 \mathrm{~L}, 10 \mathrm{~L}, 15 \mathrm{~L}, 20 \mathrm{~L}, 200 \mathrm{~L}, 640 \mathrm{~L}, 1000 \mathrm{~L})$ |
| Coformulants of concern for <br> national authorisations | - |

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| Restrictions related to identity | - |
| :--- | :--- |
| Mandatory tank mixtures | None |
| Recommended tank mixtures | None |

### 1.6 Conclusion

The evaluation of the application for PRODUCT NAME resulted in the decision to refuse the authorisation.

### 1.7 Substances of concern for national monitoring

Refer to 5.1.1.

## $1.8 \quad$ Classification and labelling

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

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

| Hazard class(es), categories: | No classification for human health. <br> Hazardous to the aquatic environment - Chronic Hazard, category 2 |
| :--- | :--- |
| Hazard pictograms: | SGH09 |

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

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

N/A : no marketing authorisation granted

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

None.

### 1.9 Risk management

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

The French Order of 4 May $2017^{6}$ provides that:

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

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

Moreover, for glyphosate-based products, the official statement ${ }^{7}$ of 8 October 2004 provides specific restrictions (applied doses and/or conditions of use) for uses on crops, in non-agricultural or industrial areas or in forestry.
Finally, the French Order of 12 April $2021^{8}$ provides that:

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

Thus, at French national level, possible extrapolation of submitted data and the corresponding assessment from "reference" crops to "related" ones are undertaken even if not clearly requested by the applicant in their dRR , and a conclusion is also reached on the acceptability of the intended uses on those "related" crops. The aim of this Order, mainly based on the EU document on residue data extrapolation ${ }^{9}$ is to supply "minor" crops with registered plant protection products.

Therefore the GAP table (Section 2.3) and Decision may include uses on crops not originally requested by the applicant.

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

### 1.9.1 Restrictions linked to the PPP

N/A : no marketing authorisation granted

### 1.9.2 Specific restrictions linked to the intended uses

Some of the authorised uses are linked to the following conditions in addition to those listed under point 1.9.1 (mandatory labelling):

None.

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### 1.10

## Intended uses (only NATIONAL GAP)

 France as zRMS. Those uses are then granted in France.
When the conclusion is "not acceptable", the intended use is highlighted in grey and the main reason(s) reported in the remarks.
When a use is "acceptable" with GAP restrictions, the modifications of the GAP are in bold.
Use should be crossed out when the applicant no longer supports this use.

PPP (product name/code)
Active substance 1:
Applicant:
Zone(s):
Verified by MS:

Field of use:

ROUNDUP INNOVERT (MON 79351)
glyphosate
MONSANTO S.A.S
Southern Zone ${ }^{\text {(d) }}$
Yes

GAP rev. 2, date: 04/05/2023
Formulation type:
Conc. of a.s. 1:
Professional use:
Non-professional use:
$\mathrm{SL}^{(\mathrm{a}, \mathrm{b})}$
$480 \mathrm{~g} / \mathrm{L}^{\text {(c) }}$
】


[^3]
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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Use-$\text { No. }{ }^{(\mathrm{e})}$ | Member state(s) | Crop and/ or situation <br> (crop destination/purpose of crop) | F, Fn, Fpn G, Gn, Gpn or I | Pests or Group of pests controlled <br> (additionally: developmental stages of the pest or pest group) | Application |  |  |  | Application rate |  |  | PHI <br> (days) | Remarks: <br> e.g. g safener/synergist per ha (f) |
|  |  |  |  |  | Method/Ki nd | Timing/Growth stage of crop \& season | Max. number <br> a) per use <br> b) per crop/ season | Min. interval between applications (days) | kg or L product/ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | g a.s./ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | Water L/ha $\mathrm{min} / \mathrm{ma}$ |  |  |
| 14 | FR | Inter crop, fallow land, crop destruction only Non crop area | F | annual weeds, annual broad-leaved, biannuals, | spraying, <br> spot <br> treatment, <br> brushing <br> or wiping <br> with <br> special <br> equipment <br> for <br> selective <br> control | Pre-plant / presowing (actively growing weeds) | $\begin{array}{\|l} 3 \\ (\max 2880 \mathrm{~g} \\ \mathrm{sa} / \mathrm{ha} / \mathrm{an}) \end{array}$ | - | 3.75 | 1.80 | 100 | - | Not finalised (relevant impurity, genotoxic potential, (*)) |
| 14 | FR | land, crop destruction only Non crop area | F | perennial weeds | Spot application only | Pre-plant / presowing (actively growing weeds) | $\begin{array}{\|l} 3 \\ (\max 2880 \mathrm{~g} \\ \mathrm{sa} / \mathrm{ha} / \mathrm{an}) \end{array}$ | - | 6.00 | 2.88 | 500 | - | Not acceptable (relevant impurity, genotoxic potential, (*)) |

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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \text { Use- } \\ & \text { No. }{ }^{(\mathrm{e})} \end{aligned}$ | Memberstate(s) | Crop and/ or situation <br> (crop <br> destination/purpose of crop) | F, <br> Fn, <br> Fpn <br> G, <br> Gn, <br> Gpn <br> or <br> I | Pests or Group of pests controlled <br> (additionally: <br> developmental stages of the pest or pest group) | Application |  |  |  | Application rate |  |  | $\begin{aligned} & \underset{\text { PHI }}{\text { PHays }} \end{aligned}$ | Remarks: <br> e.g. g safener/synergist per ha |
|  |  |  |  |  | Method/Ki <br> nd | Timing/Growth stage of crop \& season | Max. number <br> a) per use <br> b) per crop/ season | Min. interval <br> between <br> applications <br> (days) | kg or L product/ha a) max. rate per appl. <br> b) max. total rate per crop/season | g a.s./ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | $\begin{aligned} & \text { Water } \\ & \text { L/ha } \\ & \text { min/ma } \\ & \text { x } \end{aligned}$ |  |  |
|  | FR | Inter-row in vegetable crops | F | annual weeds | Spraying | actively growing weeds | 1 |  | 2.25 | 1.08 |  | "bulb/s tem lfruitin g vegeta bles": 60 d, "legu me/lea fy/puls es vegeta bles, herbs and edible flower s": 30 d" | Not acceptable (MRL compliance for rootvegetables, tuber, cabbage relevant impurity, genotoxic potential, (*)) |
|  | FR | Inter-row in vegetable crops | F | annual broad-leaved, biannuals, | Spraying | actively growing weeds | 1 | - | 4.5 | 2.16 |  | - | Not acceptable (MRL relevant impurity, genotoxic potential, (*)) |
|  | FR | Inter-row in vegetable crops | F | perennial weeds | Spraying <br> Spot applicatio n | actively growing weeds | 1 | - | 5.25 | 2.52 |  | - | Not acceptable (MRL relevant impurity, genotoxic potential, (*)) |

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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{array}{\|l\|} \hline \text { Use- } \\ \text { No. }{ }^{(e)} \end{array}$ | Member state(s) | Crop and/ or situation (crop destination/purpose of crop) | F, <br> Fn, <br> Fpn <br> G, <br> Gn, <br> Gpn <br> or <br> I | Pests or Group of pest | Application |  |  |  | Application rate |  |  | $\underset{\text { (days) }}{\mathbf{P H I}}$ | Remarks: <br> e.g. g safener/synergist per ha <br> (f) |
|  |  |  |  | (additionally: developmental stages of the pest or pest group) | Method/Ki nd | Timing/Growth stage of crop \& season | Max. number <br> a) per use <br> b) per crop/ <br> season | Min. interval between applications (days) | kg or L product/ha a) max. rate per appl. <br> b) max. total rate per crop/season | g a.s./ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | Water L/ha <br> min/ma x |  |  |
| 8 | FR | Orchards | F | Annual grasses | Spraying | actively growing weeds | $\begin{array}{\|l} 3 \\ (\max 2200 \mathrm{~g} \\ \text { sa/ha/an }) \end{array}$ |  | 2.25 | 1.08 | $\begin{aligned} & 100- \\ & 300 \end{aligned}$ | Citrus tree nuts, stone fruits, pome fruits, 21 d Kiwi: 90 d Olives: 7 d | Not acceptable (relevant impurity, genotoxic potential, (*)) |
| 8 | FR | Orchards | F | Annual broad-leaved, biannuals, | Spraying | actively growing weeds | $\begin{array}{\|l} 3 \\ (\max 2200 \mathrm{~g} \\ \mathrm{s} / \mathrm{ha} / \mathrm{an}) \end{array}$ | - | 4.5 | 2.16 | $\begin{aligned} & 100- \\ & 300 \end{aligned}$ | Citrus tree nuts, stone fruits, pome fruits, 21 d Kiwi: 90 d Olives: 7 d | Not acceptable (relevant impurity, genotoxic potential, (*)) |

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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| UseNo. ${ }^{(\mathrm{e})}$ | Member state(s) | Crop and/ or situation <br> (crop <br> destination/purpose of crop) | F, <br> Fn, <br> Fpn <br> G, <br> Gn, <br> Gpn <br> or <br> I | Pests or Group of pests | Application |  |  |  | Application rate |  |  | $\begin{array}{\|l\|l} \hline \mathbf{P H I} \\ \text { (days) } \end{array}$ | Remarks: <br> e.g. g safener/synergist per ha <br> (f) |
|  |  |  |  | controlled <br> (additionally: <br> developmental stages of the pest or pest group) | Method/Ki <br> nd | Timing/Growth stage of crop \& season | Max. number <br> a) per use <br> b) per crop/ <br> season | Min. interval between applications (days) | kg or L <br> product/ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | g a.s./ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | Water L/ha <br> min/ma <br> x |  |  |
| 8 | FR | Orchards | F | perennial weeds |  | actively growing weeds | $\begin{aligned} & 3 \\ & (\text { max } 2200 \mathrm{~g} \\ & \mathrm{s} / \mathrm{ha} / \mathrm{an}) \end{aligned}$ |  | 6 | 2.88 | $\begin{aligned} & 100- \\ & 300 \end{aligned}$ | Citrus, tree nuts, stone fruits, pome fruits, 21 d Kiwi: 90 d Olives: 7 d | Not acceptable (relevant impurity, genotoxic potential, (*)) |
| 13 a | FR | Forest trees devitalisation | F | Tree stumps or bushes | Contact application wiping/ brush | within 1 h after cutting | 1 | - | $0.25 \mathrm{l} / \mathrm{m}^{2}$ of stump section | $120 \mathrm{~g} / \mathrm{m}^{2}$ of stump section | - | - | Not acceptable (relevant impurity, genotoxic potential, (*)) |
| 13b | FR | Brush | F | - | Spraying, with tunnel spraye | - | - | - | 7.5 | 3.6 | - | - | Not acceptable (relevant impurity genotoxic potential, (**)) |

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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Use- <br> No. ${ }^{(\mathrm{e})}$ | Member state(s) | Crop and/ or situation (crop destination/purpose of crop) | F, <br> Fn, <br> Fpn <br> G, <br> Gn, <br> Gpn <br> or <br> I | Pests or Group of pests controlled <br> (additionally: developmental stages of the pest or pest group) | Application |  |  |  | Application rate |  |  | PHI <br> (days) | Remarks: <br> e.g. g safener/synergist per ha (f) |
|  |  |  |  |  | Method/Ki nd | Timing/Growth stage of crop \& season | Max. number <br> a) per use <br> b) per crop/ season | Min. interval between applications (days) | kg or L product/ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | g a.s./ha <br> a) max. rate per appl. <br> b) max. total rate per crop/season | Water L/ha $\begin{aligned} & \min / \mathrm{ma} \\ & \mathrm{x}^{2} \end{aligned}$ |  |  |
| 14 | FR | Non-crop areas | F | annual and perennial weeds | spraying, <br> spot <br> treatment, <br> brushing <br> or wiping <br> with <br> special <br> equip- <br> ment for <br> selective <br> control | actively growing weeds | 3 <br> Permeable areas: 2.88 kg a.s/ha/year For perennials: spot application only Impermeable areas: 1.50 kg a.s/ha/year. Spot application only | - | 3.75 | 1.80 | - |  | Not acceptable (relevant impurity, genotoxic potential, (*)) |
| 14 | FR | Non-crop areas | F | annual and perennial weeds | Only spot treatment | actively growing weeds | 3 <br> Permeable areas: 2.88 kg a.s/ha/year For perennials: spot application only Impermeable areas: 1.50 kg a.s/ha/year. Spot application only |  | 6.0 | 2.88 | - |  | Not acceptable (relevant impurity, genotoxic potential, (*)) |

[^4]$\left({ }^{* *}\right)$ Risk to diversity and abundance of non-target terrestrial arthropods (other than bees) and vertebrates via trophic interactions.

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```
Remarks
table
heading:
(a) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
(b) Catalogue of pesticide formulation types and international coding system CropLife International Technical Monograph n², 6th Edition Revised May 2008
(c) \(\mathrm{g} / \mathrm{kg}\) or \(\mathrm{g} / \mathrm{l}\)
```

Remarks $1 \quad$ Numeration necessary to allow references
columns: 2 Use official codes/nomenclatures of EU Member State
3 For crops, the EU and Codex classifications (both) should be used; when relevant, the use ituation should be described (e g. fumigation of a structure)
$4 \quad$ F: professional field use, Fn: non-professional field use, Fpn: professional and nonprofessional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application
5 Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named.
6 Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants type of equipment used must be indicated.
(d) Select relevant
(e) Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1
(f) No authorisation possible for uses where the line is highlighted in grey, Use should be crossed out when the notifier no longer supports this use.

7 Growth stage at first and last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
8 The maximum number of application possible under practical conditions of use must be provided.
9 Minimum interval (in days) between applications of the same product
10 For specific uses other specifications might be possible, e.g.: $\mathrm{g} / \mathrm{m}^{3}$ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
11 The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g , kg or L product/ha).
12 If water volume range depends on application equipments (e.g. ULVA or LVA) it should be mentioned under "application: method/kind"
PHI - minimum pre-harvest interval
14 Remarks may include: Extent of use/economic importance/restrictions

## 2 Background of authorisation decision and risk management

## $2.1 \quad$ Physical and chemical properties (Part B, Section 2)

ROUNDUP INNOVERT is a soluble concentrate (SL). The appearance of the product is a homogeneous brown liquid, with a caramel odour. It is not explosive and has no oxidising properties. The product is not flammable. It does not have a self-ignition temperature below $600^{\circ} \mathrm{C}$. In aqueous solution, it has a pH value of 4.22 (temperature is missing). There is no effect of low temperature on the stability of the formulation after 7 days at $0^{\circ} \mathrm{C}$. Its technical characteristics are acceptable for a soluble concentrate (SL) formulation.
The active substance glyphosate contains two relevant impurities, formaldehyde and N-nitrosoglyphosate.
The relevant impurity formaldehyde is a starting material of the manufacturing process for glyphosate and as such cannot be formed during the storage of the formulation. The monitoring of this impurity in the storage studies is not necessary.

The relevant impurity N-nitrosoglyphosate is likely to form during the process formulation and storage of the product.

In the accelerated stability study (Rages, D., 2013), the content of NNG before and after storage ( 0.239 ppm and 0.223 ppm respectively) is in the acceptable limit $(0.376 \mathrm{mg} / \mathrm{kg})$. The analytical method (AG-ME-168101 ) for its determination is validated with an LOQ of 0.205 ppm .
In the ambient shelf life study (Park,A., 2017 Park Anne 2018 MSL0029507), the content of NNG is below the acceptable limit before storage but above the acceptable limit after 1 and 2 years ( 0.40 ppm and 0.40 ppm respectively). Moreover the LOQ of the analytical method (HPLC-UV method ME-2070-01) (LOQ= 0.86 ppm ) used for its determination is above the acceptable limit.

No new studies have been provided by the applicant.
The product is therefore not considered to be stable based on the data provided under the conditions tested.
The product ROUNDUP INNOVERT does not contain POE-tallowamines (CAS $n^{\circ}$ 61791-26-2).

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

Considering the data submitted:

- the efficacy level of ROUNDUP INNOVERT is considered satisfactory for all the claimed uses.
- Glyphosate having an herbicidal activity on all types of plants (known as "total weed killer"), the preparation ROUNDUP INNOVERT cannot therefore be considered selective. Given the foliar penetration of glyphosate, the preparation should not be directed to the green parts of crops.
- the risks of negative impact on yield, quality and propagation are considered negligible.
- The risk of negative impact on succeeding crops is considered negligible.
- The risk of negative impact on adjacent crops is considered acceptable, as long as the preparation does not reach the green parts of adjacent crops. Specific attention should be paid to the spraying conditions close to adjacent crops.
- There is a risk of resistance development or appearance to glyphosate for ryegrass (Lolium multiflorum, Lolium perenne and Lolium rigidum), fleabanes (Conyza sp.) and common ragweed (Ambrosia artemisifolia) requiring a survey of resistance.


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

### 2.3.1 Analytical method for the formulation

Analytical methods for the determination of the active substance and the relevant impurity formaldehyde in the formulation are available. However, limit of quantification of the analytical method for determination of the relevant impurity N -nitroglyphosate in the preparation is higher than the acceptable limit.

### 2.3.2 Analytical methods for residues

Analytical methods are available in this dossier or in the RAR and are validated for the determination of residues of glyphosate in plants, food of animal origin, soil, water (surface and drinking), air and body fluids.

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

Endpoints used in risk assessment

| Active Substance: glyphosate |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| ADI | $0.5 \mathrm{mg} \mathrm{kg} \mathrm{bw} / \mathrm{d}$ |  | EU (2017) |  |
| ARfD | $0.5 \mathrm{mg} / \mathrm{kg}$ bw |  |  |  |
| AOEL | $0.1 \mathrm{mg} / \mathrm{kg} \mathrm{bw} / \mathrm{d}$ |  |  |  |
| AAOEL | none |  |  |  |
| Dermal absorption | Based on an in vitro human study performed on formulation: |  |  |  |
|  |  | Concentrate (tested) | Diluted f <br> (tes | mulation <br> d) |
|  |  |  | 28.7 g/L | $2.4 \mathrm{~g} / \mathrm{L}$ |
|  | In vitro (human) \% | 0.3 | 0.5 | 2.4 |
|  |  | Concentrate <br> (used in formula- <br> tion) <br> $480 \mathrm{~g} / \mathrm{L}$ |  | ution nulation) $\mathrm{g} / \mathrm{L}$ |
|  | Dermal absorption endpoints \% | 0.3 |  |  |
| Oral absorp tion | 20\% |  |  |  |

[^5]
### 2.4.1 Acute toxicity

ROUNDUP INNOVERT containing $480 \mathrm{~g} / \mathrm{L}$ of glyphosate has a low toxicity in respect to acute oral, inhalation and dermal toxicity, is not irritating to the rabbit skin or eye and is not a skin sensitiser.

### 2.4.2 Genotoxic potential

Based on the results of the Ames test and the second in vitro micronucleus performed on ROUNDUP INNOVERT, ROUNDUP INNOVERT is not mutagenic, not aneugenic nor clastogenic under the study conditions. Thus, the assessment of genotoxicity of ROUNDUP INNOVERT can be finalised.

### 2.4.3 Operator exposure

Summary of critical use patterns (worst cases):

| Crop type | F/G ${ }^{10}$ | Equipment <br> Application method | Maximum application rate kg as /ha | Model (Minimum volume water (L/ha)) |
| :---: | :---: | :---: | :---: | :---: |
| bare soil | F | Vehicle mounted Downward spraying | 6 L MON 79351/ha 2.88 kg glyphosate/ha | EFSA <br> (100 L/ha) |
|  |  | Manual hand-held Downward spraying | 6 L MON 79351/ha 2.88 kg glyphosate/ha | $\begin{gathered} \hline \text { EFSA } \\ (100 \mathrm{~L} / \mathrm{ha}) \end{gathered}$ |
|  |  | Manual knapsack <br> Downward spraying | 6 L MON 79351/ha 2.88 kg glyphosate/ha | $\begin{gathered} \text { EFSA } \\ (100 \mathrm{~L} / \mathrm{ha}) \end{gathered}$ |
| devitalization of vines and brambles, non-agricultural area, forestry |  | Vehicle mounted Downward spraying | 7.5 L MON 79351/ha 3.6 kg glyphosate/ha | Modop ZNA (UPJ 2009-2010 dedicated to non-agricultural areas) |
|  |  | Manual knapsack Downward spraying | 7.5 L MON 79351/ha 3.6 kg glyphosate/ha |  |
|  |  | Manual hand-held Downward spraying | 7.5 L MON 79351/ha 3.6 kg glyphosate/ha |  |

Considering proposed uses, operator systemic exposure was estimated using the French study from UPJ 2009-2010 ${ }^{11}$ dedicated to non-agricultural areas and the EFSA model ${ }^{12}$ :

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| Crop | Equipment | PPE and/or working coverall | \% AOEL glyphosate ( $0.1 \mathrm{mg} / \mathrm{kg}$ bw/d) |
| :---: | :---: | :---: | :---: |
| bare soil | Vehicle mounted Downward spraying | Working coverall and gloves during mixing/loading and application | 2.3\% |
|  | Manual hand-held Downward spraying |  | 61\% |
|  | Manual knapsack Downward spraying |  | 16\% |
| Non-agricultural area, forestry | Vehicle mounted Downward spraying |  | 17\% |
|  | Manual knapsack Downward spraying |  | 1.8\% |
| devitalization of vines and brambles, non-agricultural area, forestry | Manual hand-held Downward spraying |  | 29\% |

According to the model calculations, it can be concluded that the risk for the operator using MON 79351 is acceptable with a working coverall and gloves during mixing/loading and application.

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

### 2.4.4 Worker exposure

Not applicable for the intended uses.
For details of personal protective equipment for workers, refer to the Decision in Appendix 1.

### 2.4.5 Bystander and resident exposure

Consideration of acute exposure should only be made where an AAOEL has been established during an approval, review or renewal evaluation of an active substance, i.e. no acute operator or bystander exposure assessments can be performed with the AOEM model where no AAOEL has been set .
Only resident exposure is provided since, according to EFSA Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products (EFSA Journal 2014;12(10):3874): "No bystander risk assessment is required for PPPs that do not have significant acute toxicity or the potential to exert toxic effects after a single exposure. Exposure in this case will be determined by average exposure over a longer duration, and higher exposures on one day will tend to be offset by lower exposures on other days. Therefore, exposure assessment for residents also covers bystander exposure."

Residential exposure was assessed according to EFSA model. An acceptable risk was determined for residents (adult and/or child) without mitigation measure:

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| Bare soil <br> Downward spraying, |  | Glyphosate |  |
| :---: | :---: | :---: | :---: |
| ZNT : |  |  |  |
| 2-3 mètres | DT50 (days) | 30 |  |
| w/o drift reduction tech- | DFR ( $\mu \mathrm{g} / \mathrm{cm}^{2} / \mathrm{kg}$ a.s./ha) | 3 |  |
|  | Application rate (kg a.s./ha) | $1 \times 2.88$ kg glyphosate/ha |  |
|  | Pathways (percentile) | Total absorbed dose (mg/kg bw/day) | \% AOEL |
| Resident child <br> Body weight: 10 kg | Sum (mean) | 0.0441 | 44\% |
| Resident adult Body weight: 60 kg | Sum (mean) | 0.0161 | 16\% |

## $2.5 \quad$ Residues and consumer exposure (Part B, Section 7)

The data available are considered sufficient for risk assessment. An exceedance of the current MRL (Reg. 293/2013) for glyphosate as laid down in Reg. (EU) 396/2005 is not expected providing the application of the mitigation measures, except for olives in contact with soil.

Intended interrow uses on groups "root and tuber vegetables", "brassica vegetables", "fungi", "oilseed", "cereals", "berries and small fruits", "tea, coffee, and herbal infusions", "hops" and "spices" are not supported by available data and the compliance with current MRLs cannot be performed.
In accordance with the available residue data, a maximum application dose of $2.25 \mathrm{~L} / \mathrm{ha}$ is retained for inter-row uses on "bulb vegetables", "stem vegetables", "fruiting vegetables", "legume vegetables", "pulses" and "leafy vegetables and herbs and edible flowers". Furthermore, a PHI of 60 days is retained for inter-row uses on "bulb vegetables", "stem vegetables" and "fruiting vegetables" and a PHI type F for inter-crop/pre-emergence uses.

The chronic and the short-term intakes of glyphosate residues are unlikely to present a public health concern.

As far as consumer health protection is concerned, zRMS France, agrees with the authorization of the intended inter-row uses ("bulb vegetables", "stem vegetables", "fruiting vegetables", "legume vegetables", "pulses", "leafy vegetables and herbs and edible flowers") and uses on orchards.
According to available data, the following specific mitigation measures are recommended:

- For uses on orchards, olives and inter-row uses: "Use application material or agricultural practices to avoid edible parts contact with active substance or with soil treated with active substance"


## Summary for ROUNDUP INNOVERT

Table 1: Information on ROUNDUP IINNOVERT (KCA 6.8)

| Crop | PHI for ROUNDUP INNOVERT proposed by applicant | PHI/ Withholding period* sufficiently supported for | PHI for ROUNDUP INNOVERT proposed by zRMS | zRMS Comments (if different PHI proposed) |
| :---: | :---: | :---: | :---: | :---: |
|  |  | Glyphosate |  |  |
| Citrus | 21 days | Yes | 21 days |  |
| Pome fruits | 21 days | Yes | 21 days |  |

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| Crop | PHI for ROUNDUP INNOVERT proposed by applicant | PHI/ Withholding period* sufficiently supported for | PHI for ROUNDUP INNOVERT proposed by zRMS | zRMS Comments (if different PHI proposed) |
| :---: | :---: | :---: | :---: | :---: |
|  |  | Glyphosate |  |  |
| Stone fruits | 21 days | Yes | 21 days |  |
| Tree nuts | 21 days | Yes | 21 days |  |
| Kiwi | 90 days | Yes | 90 days |  |
| Olives | 7 days | Yes | 7 days |  |
| Grapes | 21 days | Yes | 21 days |  |
| Inter-row treated vegetables "legume vegetables", "pulses", "leaf vegetables, herbs and edible flowers" | 30 days | Yes | 30 days |  |
| Inter-rows treated vegetable "bulb vegetables", "stem vegetables", "fruiting vegetables" | 30 days | No | 60 days | Trials performed at PHI 60 days |
| Inter-row treated vegetables "root and tuber vegetables", "brassica vegetables", "fungi", "oilseeds", "cereals", "berries and small fruits", "tea, coffee, and herbal infusions", "hops" and "spices" | 30 days | - |  | This use is not recommended in France as not sufficient residue trials are available. |

NR: not relevant

* Purpose of withholding period to be specified
** F: PHI is defined by the application stage at last treatment (time elapsing between last treatment and harvest of the crop).
The results of the rotational crop study have shown that neither glyphosate nor AMPA show a potential uptake into follow crops. No specific waiting period is thus required.


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

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

The PEC of glyphosate and its metabolites in soil, surface water and groundwater have been assessed according to FOCUS guidance documents, with standard FOCUS scenarios to obtain outputs from the FOCUS models or with specific models (e.g. HardSPEC) and the endpoints established in the EU conclusions or agreed in the assessment based on new data provided.

PEC soil and PECsw derived for glyphosate and its metabolites are used for the ecotoxicological risk assessment.

For uses on hard surfaces, the estimation of PECgw is not considered relevant. For other uses, PECgw for glyphosate and its metabolite do not occur at levels exceeding those mentioned in regulation EC 1107/2009. Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses.

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

### 2.7 Ecotoxicology (Part B, Section 9)

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

Based on the guidance documents, the risks for birds, aquatic organisms, mammals, bees and other nontarget arthropods, earthworms, other soil macro-organisms and micro-organisms and terrestrial plants with risk mitigations are acceptable for the intended uses, except for devitalization on brambles.

Risk mitigation measures are required in order to protect aquatic organisms and non-target plants for uses on agricultural area.

Concerning the risk assessment to bees and other pollinisators, for the intended uses with down-ward application at full dose, the EFSA GD 2013 tier 1 trigger values are not exceeded for application lower and including 2.28 kg a.s./ha. For intended uses in spot applications ( $<10 \%$ of the area), in view of the highest concentration tested in the bee brood semi-field test, the risk can be consid-ered acceptable at doses up to 2.88 kg a.s./ha.

Concerning the risk to diversity and abundance of non-target terrestrial arthropods and vertebrates via trophic interactions (Regulation (EU) 2017/2324), no information has been provided by the notifier to assess this risk.

The following safety phrase is applied in FR at national level for intended uses in forestry: « Avoid spray drift and runoff to nearby plants for uses on non-agricultural areas in forestry ».

## $2.8 \quad$ Relevance of metabolites (Part B, Section 10)

Not relevant.

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

The active substance glyphosate is not approved as a candidate for substitution, however a comparative assessment according to Art. 50(2) is undertaken.

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

When the conclusions of the assessment is « Not acceptable», please refer to relevant summary under point 3 "Background of authorisation decision and risk management".

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### 4.1.1 Post-authorisation monitoring

The survey of resistance to glyphosate should be continued based on analysis of field efficacy failures (one monitoring for all products based on glyphosate), and especially on ryegrass (Lolium multiflorum, Lolium perenne and Lolium rigidum), fleabanes (Conyza sp.) and common ragweed (Ambrosia artemisiifolia). Any new information which would change the resistance risk analysis should be provided to Anses. In all cases, a report on the results of the survey put in place should be provided at the time of the next renewal of glyphosate.

### 4.1.2 Post-authorisation data requirements

The following data would have been required to update the dossier:

- An accelerated storage stability study and a shelf life study with the content of NNG before and after the storage should be provided. The NNG should be determined with a validated method with a limit of quantification in accordance with the maximum concentration limit of this NNG impurity in the preparation.

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## Appendix 1 Copy of the product authorisation

anses
anses

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

Vu les dispositions du règlement (CE) N ${ }^{\circ} 1107 / 2009$ du 21 octobre 2009 et de ses textes d'application,
Vu le règlement d'exécution (UE) 2017/2324 de la Commission du 12 décembre 2017 renouvelant l'approbation de la substance active "glyphosate» conformément au règlement (CE) $n^{\circ}$ 1107/2009 du Parlement européen et du Conseil concemant la mise sur le marché des produits phytopharmaceutiques et modifiant l'annexe du règlement d'exécution (UE) $n^{\circ}$ 540/2011 de la Commission,

Vu le code rural et de la pêche maritime, notamment le chapitre III du titre V du livre II des parties législative et règlementaire,

Vu les demandes de renouvellement de l'autorisation de mise sur le marché, suite au renouvellement de l'approbation de la substance active glyphosate, de modification des informations déclarées et les données complémentaires fournies suite à une exigence post-autorisation du produit phytopharmaceutique ROUNDUP INNOVERT

| de la société | MONSANTO SAS |
| :--- | :--- |
| enregistrées sous les | $n^{\circ}$ 2018-0462, 2019-0456, 2014-0140, 2015-0485 et 2019-4413 |

Vu les conclusions de l'évaluation de l'Anses du 21 octobre 2019,
Considérant que les données fournies ne permettent pas d'évaluer le potentiel génotoxique du produit,
Considérant qu'un effet génotoxique ne peut être exclu,
Considérant que les conditions mentionnées à l'article 29 du règlement (CE) $n^{\circ} 1107 / 2009$ ne sont donc pas respectées,

L'autorisation de mise sur le marché du produit phytopharmaceutique désigné ci-après n'est pas renouvelée en France.

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## anses

| Informations générales sur le produit |  |
| :---: | :---: |
| Nom du produit | ROUNDUP INNOVERT |
| Type de produit | Produit de référence |
| Titulaire | MONSANTO SAS <br> Eden Park - Bâtiment B 1 rue Buster Keaton 69800 ST PRIEST FRANCE |
| Formulation | Concentré soluble (SL) |
| Contenant | $588,1 \mathrm{~g} / \mathrm{L}$ - glyphosate sel de potassium (équivalent à $480 \mathrm{~g} / \mathrm{L}$ de glyphosate) |
| Numéro d'intrant | 2100194 |
| Numéro d'AMM | 2120035 |
| Fonction | Herbicide |
| Gamme d'usage | Professionnel |

A Maisons-Alfort le, 29 NOV. 2019

Caroline SEMAILLE
Directrice générale délgguée
en charge du pôle produits réglementés
Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES)
1
Libernt $-E_{\text {galite }}$ - Fraternite
RÉPUBLIQUE FRANÇAISE
8
$y$
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0

| Liste des usages retirés |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Usages | Dose d'emploi | Nombre maximum d'applications | Délai avant récolte (jours) | Délai accordé pour la vente et la distribution | Délai accordé pour le stockage et l'utilisation des stocks |
| 11015911 <br> Traitements généraux* Dévital. Broussailles | 7,5 L/ha | - | Non applicable | 6 mois à compter de la présente décision | 12 mois à compter de la présente décision |
|  | Motivation du retrait : <br> L'usage revendiqué correspondant au nouveau libellé « Traitement Généraux * Débroussaillage », est retiré au motif que les données fournies ne permettent pas d'évaluer le potentiel génotoxique du produit. |  |  |  |  |
| 11015904 <br> Usages non agricoles* Désherb. total | 3,75 L/ha | 3/an | Non applicable | 6 mois à compter de la présente décision | 12 mois à compter de la présente décision |
|  | Motivation du retrait : <br> L'usage revendiqué correspondant au nouveau libellé « Traitement Généraux * Désherbage * Zones non cult. », est retiré au motif que les données fournies ne permettent pas d'évaluer le potentiel génotoxique du produit. <br> L'usage est également retiré à la dose de 6 L/ha au même motif. |  |  |  |  |
| 11015903 <br> Usages non agricoles* Désherbage* <br> All. PJT, Cimet., Voies | 3,75 L/ha | 3/an | Non applicable | 6 mois à compter de la présente décision | 12 mois à compter de la présente décision |
|  | Motivation du retrait : <br> L'usage revendiqué correspondant au nouveau libellé « Usages non agricoles * Désherbage * PJT », est retiré au motif que les données fournies ne permettent pas d'évaluer le potentiel génotoxique du produit. L'usage est également retiré à la dose de $6 \mathrm{~L} / \mathrm{ha}$ au même motif. |  |  |  |  |
| ROUNDUP INNOVERT <br> AMM n ${ }^{\circ} 2120035$ |  |  |  |  |  |

[^7]MON 79 351/ ROUNDUP INNOVERT
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## Appendix 2 Copy of the product label

The draft product label as proposed by the applicant is reported below. The draft label may be corrected with consideration of any new element. The label shall reflect the detailed conditions stipulated in the Decision.


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10-Jul-17 !

## Les differentes étapes du traitement - Précautions d'emploi


bon nivosu dofticaciso diss fC or jugqừ $30^{\circ} \mathrm{C}$.
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## STOCKAGE DU PRODUIT

Consorver lo produt uniquament dans san ambaloge forigino, dons un boa phyophomscousque contome a phyolomartation on viguour a róout den aliments ot boissons, y compris cous pour animusu. Consorver hors do la portion de antortas of dos porsonnos non quillitios.

OFNDANTIFTRAITEMEAT

## LA PREPARATION

Rincor lo pulvórisatour avant omplia,
Mosuror la sutaco à trator pour no próparor quo la quartsóo nócossaino (oxample: 8 mitros do longuour $\times 5$ mitros dolargour $=40 \mathrm{~m}^{2}$ ).
Calculer la dose nócossaire on fonction do la sutace ot du typo de mavrahos horbos.
Vorsor un pou d'bsu propro dans lo pulvérisatour,
Doser lo volume nócossaire dans lo pulvíriantour puls complósor avoole volume doan indqué,
No pas surdosor Rospoctor los dosos domplol indqubios surr'túquoto.

L'APPLICATION
Pulvórisorà uno datanoo do 20 à 30 cm sur los maunalsos horbos dévoloppóos Ou on croissance. Roundup INNOVERT un deashorbant non sdocst qui dotrut tout vígétal traisb, évisories projoctions sur los plontos à consovor of uniser un cacho horbidide at nócosssing.
Couporlos foullos dos voggótauxa oonsover al ellos ont rogu une consover si allos ont rogy,
Golaboussure do produt, No |amols trator a moins do 5 metres dun point doosu frussosux, puiss. doun point dosu frussosix, puis,
tosso, grile d'óvacuation doosu, bouche tosso, gitle doracuarion dosu, bouch
d'ogour-), sur un tornah on ponto pouent ontrah er un ruissolomont vo un point doasu ou sur un tarrah saturb on 0 as.
Pourle dóshatoge dos massitas. arnomonts ou borduros do polouse, 1 ost consollí dustisor un coscho do protoction pour évitor touto projoction surla vogotation a prosevorainsique io nizsolomort aur los maungos horbos.
Evarbor touto pulvíritastion ou ambruna sur lo foullogo dos culturos ou plantations voishos, an partioulior on ofso ou on automno pourlos plartation abutives. En cas de propoction acoidonsolo sur lo foullago dos plantos à proborver, itnoor abondemmont of: Immódatomont avoo do loas.

APRES LE TRAITEMENT Rincor lo pulveriaatour apris tristomert.
No pas ontror dans la zone trais6o avont lo súchogo complot. Amondro somaine avart do roplantor los tonds do bidon ot de puidigout los fonds do bidon ot do pulvarisctour propre ot appliquarios osurde propro es appliquar ios asurde onhorbio (trichos) ou dans lo cadro do disposet do goastions of traltomonts dos ofthuonts ( $\omega x$ Phytoboso ", Osmotim ${ }^{*}$ ato-).
Pourune aficasdso optimale, rospoctor Pour uno aficsaso optina a, nospoctor lo sol do 7 jours, pour pormotro au produt d fassuror la dostruction complitso dos mavevosos hatos. Consorver Roundup INNOVERT dans gol, dens voto looni phytonentaino Roomplal do lomholbyointort EN CAS DE DEVERSEMENT
ACCIDENTEL
So protigor (EP) ot socurthor la zono. Pitivonir ios pomploss (18) an cas de dangor immódat pour forwironnoment quo vous no powoz górer avoovos propros moyens.
Coloctor tout co qui a pu bsoo on contact avoo lo produt, torno soultio incluse. Notsoyor lo aiso ot lomatiofiol utilibé, on piońrís par lo córation do noltoppgo Los ofliminor solon la a ofolomortarion on viguour.

## Roundup INNOVERT

* Propntetes et Perlode ofutulsation
- RoundupinNoVert cat un diahabart syatimique non stibare Il dibut la plipart das muvaicas herbes annoilibs (amarintos, aníropodea).
 foriber a nowembre.


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[^0]:    1 COMMISSION IMPLEMENTING REGULATION (EU) 2017/2324 of 12 December 2017, renewing the approval of the active substance glyphosate in accordance with Regulation (EC) $\mathrm{N}^{\circ} 1107 / 2009$ of the European Parliament and the Council concerning the placing of plant protection products on the market, and amending the Annex to commission Implementing Regulation (EU) N ${ }^{\circ} 540 / 2011$.
    2 REGULATION (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC
    3 SANCO document "risk envelope approach", European Commission (14 March 2011). Guidance document on the preparation and submission of dossiers for plant protection products according to the "risk envelope approach"; SANCO/11244/2011 rev. 5

[^1]:    4 COMMISSION REGULATION (EU) No 546/2011 of 10 June 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards uniform principles for evaluation and authorisation of plant protection products
    ${ }^{5}$ High density polyethylene

[^2]:    6 Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjuvants visés à l'article L. 253-1 du code rural et de la pêche maritime https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte

    7 Avis du 8 octobre 2004 à tous les détenteurs d'autorisations de mise sur le marché pour des spécialités commerciales à base de glyphosate, https://www.legifrance.gouv.fr/jo_pdf.do?id=JORFTEXT000000445445
    ${ }^{8}$ https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043401456
    9 SANCO document "guidance document:- Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs": SANCO/ 7525/VI/95-rev. 9

[^3]:    Zonal uses (field or outdoor uses, certain types of protected crops)

[^4]:    (). Risk to diversity and abundance of non-target terrestrial arthropods and vertebrates via trophic interactions.

[^5]:    *pro rata correction

[^6]:    ${ }^{10}$ Open field or glasshouse
    11 Studies and models that can be used to estimate operator exposure during the use of plant protection products in non- agricultural areas. Report from expert group «produits phytosanitaires : substances et préparations chimiques » Working group "évaluation de l'exposition des utilisateurs de produits phytopharmaceutiques en zones non agricoles" - June 2011
    12 AOEM - Agricultural Operator Exposure Model (EFSA Journal 2014:12 (10):3874)

[^7]:    AMM $n^{\circ} 2120035$

