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

PRODUCT ASSESSMENT REPORT OF A BIOCIDAL PRODUCT FOR RENEWAL OF NATIONAL AUTHORISATION APPLICATIONS

(submitted by the evaluating Competent Authority)



FENOX

Product type 18

Etofenprox as included in the Union list of approved active substances

Case Number in R4BP: BC-AD065446-53

Evaluating Competent Authority: FR

Revised date: 17/01/2024

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1 HISTORY OF THE DOSSIER

Application type	refMS	Case number in the refMS	Decision date	Assessment carried out (i.e. first authorisation / amendment /)
NA-APP	FR	BC-SR017981- 11	27/09/2017	First authorisation
NA-MAC	FR	BC-MV038380- 18	22/05/2019	Major Changes: - Addition of a category of user: professional user - Addition of uses by general surface spraying against new target organisms: Cimex lectularius, Tribolium confusum, Sitophilus oryzae, Rhyzopertha dominica, Oryzaephilus surinamensis, Lasioderma serricorne (larvae only).
N.A	FR	-	-	Post authorisation data assessment
NA-RNL	FR	BC-AD065446- 53	30/11/2022	Renewal
NA-AAT	FR	BC-HH087199- 27	26/06/2023	Amendments, in the PAR only, following discussions with concerned member state (EL) in the frame of mutual recognition in sequence. No change in the SPC.
NA-AAT	FR	na	25/02/2024	Discussions with concerned members states in the frame of mutual recognition in sequence. Referral to CG: revised assessment and SPC.

2 CONCLUSION

INTRODUCTION OF THE APPLICATION

France, as e-CA, received an application from LODI S.A.S. for renewal of authorisation for the biocidal product FENOX.

The biocidal product FENOX containing 29.34 % of etofenprox¹ is a product type 18 against crawling insects including cockroaches and bed bugs by non-professional users, by indoor spraying, and against crawling insects including cockroaches, pests of stored products and bed bugs by professional users, by indoor spraying.

SUMMARY AND OVERALL CONCLUSION OF THE ASSESSMENT

Physico-chemical properties and analytical methods

The product FENOX is an emulsifiable concentrate (EC). All studies have been performed in accordance with the current requirements and the results are deemed acceptable.

The appearance of the product is a translucent liquid with a slight odour. In aqueous solution (1% dilution), it has a pH value of 6.40 at 19.9°C.

There is no effect of low and high temperature on the stability of the formulation, since after 7 days at 0°C or after 14 days at 54 °C, neither the active ingredient content nor the technical properties were changed. Long term stability studies demonstrate that the product is stable for at least 3 years when stored at ambient temperature in its commercial packaging.

Its technical characteristics are acceptable for an EC formulation. The formulation is not classified for the physico-chemical aspect.

The analytical methods are acceptable.

Efficacy

Efficacy of the product FENOX has been demonstrated against crawling insects (including cockroaches), bed bugs, and stored-goods attacking insects (confused flour beetle, rice weevil, lesser grain borer, sawtoothed grain beetle and tobacco beetle) in the conditions of use detailed in the SPC.

Resistance

Resistance to etofenprox is documented for several groups of insects including notably cockroaches and bedbugs.

A monitoring of scientific literature related to the resistance of the target organisms to the active substance etofenprox is requested at the next renewal.

The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.

Substances of concern (SoCs)

¹ COMMISSION IMPLEMENTING REGULATION (EU) No 1036/2013 of 24 October 2013 approving etofenprox as an existing active substance for use in biocidal products for product- type 18.

None of the co-formulant included in the product was identified as substance of concern for human health and/or the environment.

Risk for Human Health

The product FENOX is classified for lactation H362.

Primary exposure (professional users)

The risk is considered acceptable for professional users during spraying with the following PPE:

- Gloves during mixing and loading;
- Gloves, impermeable coverall and mask APF 4 during spraying;
- Gloves and coated coverall during the cleaning of spray equipment.

Primary exposure (non-professional users)

The risk is considered acceptable for non-professional users during spraying.

Secondary exposure (general public)

Estimated secondary exposures of infant crawling in treated surface are superior to AEL. Therefore mitigation measures are proposed:

- The product should not be applied in zone accessible to children and to pets. If it is applied on rooms accessible to children, the following mitigation measure is proposed: children should not access treated areas until all necessary treatments and cleaning have been finalised".

Estimated secondary exposures of persons (adult, child and infant) sleeping in a treated bed are superior to AELs. Therefore, the risk is considered unacceptable and a mitigation measure is proposed for bed bugs use:

For bedding, the application should be restricted to the bed frame and box spring. Do not treat the mattress, bed linen and pillows must be treated by other methods.

Risk for consumer under indirect exposure via food

No specific residue data was submitted in the framework of this dossier. The intended indoor uses in industrial, commercial, public premises and private homes via surface spraying are not expected to lead to contamination of food, feed or livestock considering the following precautionary statements:

- Remove all food, feed and drinks prior to treatment.
- Do not apply directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and livestock.
- To avoid indirect contamination during nearby application, cover all surfaces and facilities likely to be in contact with food, feed, drinks and animals.

Risk for the environment

The environmental risk assessment of the product FENOX is based on the active substance and two environmentally relevant metabolites, α CO and 4'OH. No substance of concern has been identified for the environment.

According to the CG-59 discussions (28/11/2023), the simultaneity factor of 0.00204 corresponding to a maximal use frequency of 2 times/year can be applied for professional use only. The simultaneity factor of 0.00815 corresponding to a use frequency of 3-11 times/year will be applied for non-professional use, as it can be expected that non-professional users would use the product at a higher use frequency in realistic conditions due to the wide variety of target organisms.

It was also concluded during the CG-59 discussions that an instruction for use will include that a handheld trigger spray needs to be used by non-professional users, as this complies with the efficacy data and is covered by the environmental risk assessment based on surface treatment.

The product FENOX will not pose risk to the environmental compartments for an application of the product in restricted areas (covered by the barrier treatment scenario) for 2 applications per year for professional users. Therefore, the specific instruction of use must be respected:

"The product has to be applied only on restricted areas on surfaces not regularly cleaned, for example:

- behind or under the fridge, under the kitchen sink, under the oven or the water heater, in all cracks and crevices that can be an harbourage for cockroaches.
- on the bedspring, on the feet of the bed, under furnitures, along plinths, behind headboard, on the wall behind the bed, furnitures and all crack and crevices that can be harbourage for bed bugs."

For non-professional users, a maximal use frequency of 2 times/year is not considered realistic as:

- more uses are expected by non-professional users considering the wide range of target organisms (bed bugs, cockroaches and stored goods attacking insects) that are present all year round and can occur throughout the house (stored goods attacking insects more likely in kitchen and bed bugs more likely in bedrooms etc);
- the target organisms are difficult to eradicate from the house, so in case of non-professional use reinfestation is likely.

Therefore, a simultaneity factor of 0.00815 (corresponding to 3-11 applications/year) should be applied leading to non-acceptable risks for the aquatic and terrestrial compartments. The product will not be authorized for non-professionals.

Comparative assessment

the product FENOX or to limit some uses.

The active substance etofenprox contained in the product FENOX meets the conditions laid down in Article 10(1) of Regulation (EU) No 528/2012 and is considered as a candidate for substitution. Therefore, a comparative assessment of the product FENOX is required. The outcomes of this comparative assessment does not lead to refuse the authorisation of

Overall conclusion

The conformity to the uniform principles, as defined in the Regulation (EU) n°528/2012, for the product FENOX is reported in the table below, for each use.

Uses	Application rates	Conditions of use	Conclusions
Crawling insects including cockroaches (e.g. Blattella germanica, Blatta orientalis), adults and nymphs. Bed bugs (Cimex lectularius), adults and nymphs.	Product applications are made at a maximum rate of 0.5 mL/m². The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m².	Non professionals users Indoor Surface spraying 11 applications per year maximum.	Non acceptable for the aquatic and terrestrial compartments
Crawling insects including cockroaches (e.g. Blattella germanica, Blatta orientalis), adults and nymphs.			
Stored-goods attacking insects: - Confused flour beetle (Tribolium confusum), adults; - Rice weevil (Sitophilus oryzae), adults; - Lesser grain borer (Rhyzopertha dominic a), adults; - Sawtoothed grain beetle (Oryzaephilus surinam ensis), adults; - Tobacco beetle (Lasioderma serricorn e), larvae.	Product applications are made at a maximum rate of 0.5 mL/m². The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m².	Professionals users Indoor Surface spraying 2 applications per year maximum.	Acceptable
Bed bugs (<i>Cimex lectularius</i>), adults and nymphs.	Product applications are made at a maximum rate of 0.5 mL/m². The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m².	Professionals Indoor Surface spraying 2 applications per year maximum. A second application is needed after 15 days.	Acceptable

3 ASSESSMENT REPORT

3.1 Summary of the product assessment

3.1.1 Administrative information

3.1.1.1 Identifier of the product

Identifier	Country (if relevant)
FENOX	France
FIVEX	
LE 30	
TENEXINE	
EMULSTIQUE 300	
PHOBI FENOX	
PHOBI-E	
ETO CONCENTRATE ULV	
ETOF 300	
CONCENTRE ETOFENPROX 300	
ETHOS 30 EC	

3.1.1.2 Authorisation holder

Name and address of the	Name	LODI SAS
authorisation holder		Parc d'Activités des Quatre Routes 35 390 Grand Fougeray
		France
Authorisation number	FR-2017-0	081
Date of the authorisation		
Expiry date of the		
authorisation		

3.1.1.3 Manufacturer(s) of the products

Name of manufacturer	LODI SAS
Address of manufacturer	Parc d'Activités des Quatre Routes
	35 390 Grand Fougeray
	France
Location of manufacturing	Parc d'Activités des Quatre Routes
sites	35 390 Grand Fougeray
	France

3.1.1.4 Manufacturer(s) of the active substance(s)

Active substance	Etofenprox
Name of manufacturer	Mitsui chemicals crop & life solutions, inc
Address of manufacturer ³	Nihonbashi Dia Building, 1-19-1,
	Nihonbashi 103-0027 Chuo-ku, Tokyo
	Japan
Location of manufacturing	Omuta Works, 30 Asamuta-cho, Omita
sites	836-8610 Fukuoka
	Japan

3.1.2 Product composition and formulation

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

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

Yes ☐ No ⊠

3.1.2.1 Identity of the active substance

Mair	n constituent(s)
ISO name	Etofenprox
IUPAC or EC name	·
TOPAC OF EC Hame	2-(4-ethoxyphenyl)-2-methylpropyl 3-
	phenoxybenzyl ether
EC number	407-980-2
CAS number	80844-07-1
Index number in Annex VI of CLP	
Minimum purity / content	≥ 97.2 %
Structural formula	

3.1.2.2 Candidate(s) for substitution

According to the AR of etofenprox, this active substance does not fulfil the PBT nor the vPvB criteria. Nonetheless, the substance is candidate for substitution, as it fulfils the B and T criteria.

3.1.2.3 Qualitative and quantitative information on the composition of the biocidal product²

Common	IUPAC name	Function	CAS	EC number	Content
name			number		(%)
Etofenprox	2-(4-ethoxyphenyl)-	Active	80844-07-1	407-980-2	29.34
technical	2-methylpropyl 3-	substance			
	phenoxybenzyl ether				

3.1.2.4 Information on technical equivalence

Not relevant.

The source use is the same than in the CAR of the active substance.

3.1.2.5 Information on the substance(s) of concern

Please see the confidential annex for further details.

3.1.2.6 Assessment of endocrine disruption (ED) properties of the biocidal product

The biocidal product contains the active substance etofenprox, which has not yet been evaluated according to the scientific criteria set out in the Regulation (EU) 2017/2100.

No indications of endocrine-disrupting properties according to Regulation (EU) 2017/2100 were identified for the non-active substances contained in the biocidal product.

See Confidential annex for further details.

3.1.2.7 Type of formulation

EC - Emulsifiable concentrate

3.1.3 Hazard and precautionary statements³

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

Classification			
Hazard category Additional category for effects on or via lactation			
Aquatic acute 1			
	Aquatic chronic 1		
Hazard statement	H362: May cause harm to breast-fed children.		
	H400: Very toxic to aquatic life		
	H410: Very toxic to aquatic life with long lasting effects		
Labelling			
Signal words	GHS09		
	Warning		
Hazard statements H362: May cause harm to breast-fed children.			
	H410: Very toxic to aquatic life with long lasting effects		

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Classification	
Precautionary statements	P201: Obtain special instructions before use. P260: Do not breathe spray. P263: Avoid contact during pregnancy/while nursing. P264: Wash hands thoroughly after handling. P270: Do not eat, drink or smoke when using this product.
	P308 + P313: If exposed or concerned: Get medical advice. P273: Avoid release to the environment. P391: Collect spillage. P501: Dispose of container in accordance with local requirements.
Note	

3.1.4 Authorised use(s)

3.1.4.1 Use description

Table 2. Use #2 - Professional users - Crawling insects including cockroaches and stored goods attacking insects

Product Type	18
Where relevant, an exact description of the authorised use	
(including development	Crawling insects including cockroaches (e.g. <i>Blattella germanica, Blatta orientalis</i>), adults and nymphs.
	Stored goods attacking insects: - Confused flour beetle (<i>Tribolium confusum</i>), adults; - Rice weevil (<i>Sitophilus oryzae</i>), adults; - Lesser grain borer (<i>Rhyzopertha dominica</i>), adults; - Sawtoothed grain beetle (<i>Oryzaephilus surinamensis</i>), adults; - Tobacco beetle (<i>Lasioderma serricorne</i>), larvae.
Field of use	Indoor (institutions, food industries, in domestic areas)
Application method(s)	Surface spraying
frequency	0.5 mL/m ² The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m ² . The dilution rate of 1% corresponds to dissolving of 1 sachet (5 ml) in 500 ml of water (this volume covers the area of 10 m2) and that 50 ml of the thus diluted product is to be applied to 1m ² . The biocidal effect appears in few minutes.

	The residual efficacy is up to 2 weeks when applied against stored goods attacking insects and up to 12 weeks when applied against cockroaches.
	2 applications per year maximum.
Category(ies) of users	Professionals
Pack sizes and	Bottle: HDPE, PET or HDPE/EVOH*: to 1 L
packaging material	5 mL, 10 mL or 25 mL in water soluble sachets (PVA: polyvinyl
	Alcohol) packed in Box Polystyrene which contains 250 mL (50
	sachets of 5 mL, 25 sachets of 10 mL or 10 sachets of 25 mL).
	*EVOH = PVA : Polyvinyl alcohol

3.1.4.2 Use-specific instructions for use

- Take into account the life cycle and characteristics of target insects to adapt treatments. In particular, target the most susceptible stage of the pest, timing of applications and areas to be treated.
- Adopt integrated pest management methods such as the combination of chemical, physical control methods and other public health measures, taking into account local specificities (climatic conditions, target species, conditions of use, etc.).
- Avoid exclusive repeated use of insecticides from the same chemical subgroup which for etofenprox is IRAC subgroup 3A,
- Alternate products containing active substances with different mode of action (i.e. from other IRAC Mode of Action groups).
- The product has to be applied only on restricted areas on surfaces not regularly cleaned, that can be an harbourage for target organisms for example: behind or under the fridge, under the kitchen sink, under the oven or the water heater, in all cracks and crevices.

3.1.4.3 Use-specific risk mitigation measures

- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information) during mixing and loading phase.
- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information), impermeable coverall and a respiratory mask (APF 4) during product spraying phase.
- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information) and coated coverall during the cleaning of spray equipment.

	Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment
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	Where specific to the use, the instructions for safe disposal of the product and its packaging
-	

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

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3.1.4.7 Use description

Table 3. Use #3 -Professional users - Bed bugs

Product Type	18
Where relevant, an	
exact description of the	
authorised use	
Target organism	Bed bugs (<i>Cimex lectularius</i>), adults and nymphs.
(including development	
stage)	
Field of use	Indoor (institutions, food industries, in domestic areas)
Application method(s)	Surface spraying
Application rate(s) and	0.5 mL/m².
frequency	The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m ² .
	The dilution rate of 1% corresponds to dissolving of 1 sachet (5 ml) in 500 ml of water (this volume covers the area of 10 m2) and that 50 ml of the thus diluted product is to be applied to 1m ² .
	A second application is needed after 15 days. Eradication is obtained one week after the second application.
	The biocidal effect appears in few minutes.
	The residual efficacy is up to 12 weeks when applied against bed bugs.
	2 applications per year maximum.
Category(ies) of users	Professionals
Pack sizes and	Bottle: HDPE, PET or HDPE/EVOH*: to 1 L
packaging material	5 mL, 10 mL or 25 mL in water soluble sachets (PVA: polyvinyl
	Alcohol) packed in Box Polystyrene which contains 250 mL (50 sachets of 5 mL, 25 sachets of 10 mL or 10 sachets of 25 mL). *EVOH = PVA : Polyvinyl alcohol

3.1.4.8 Use-specific instructions for use

- Take into account the life cycle and characteristics of target insects to adapt treatments. In particular, target the most susceptible stage of the pest, timing of applications and areas to be treated.
- Adopt integrated pest management methods such as the combination of chemical, physical control methods and other public health measures, taking into account local specificities (climatic conditions, target species, conditions of use, etc.).
- Avoid exclusive repeated use of insecticides from the same chemical subgroup which for etofenprox is IRAC subgroup 3A,

- Alternate products containing active substances with different mode of action (i.e. from other IRAC Mode of Action groups).
- The product has to be applied only on restricted areas on surfaces not regularly cleaned, that can be harbourage for bed bugs, for example: on the bedspring, on the feet of the bed, under furniture, along plinths, behind headboard, on the wall behind the bed, furniture and all crack and crevices.

3.1.4.9 Use-specific risk mitigation measures

- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information) during mixing and loading phase.
- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information), impermeable coverall and a respiratory mask (APF 4) during product spraying phase.
- Wear protective chemical resistant gloves (glove material to be specified by the authorisation holder within the product information) and coated coverall during the cleaning of spray equipment.
- For bedding, the application should be restricted to the bed frame and box spring.
- Do not treat the mattress, bed linen and pillows.
- The mattress, bed linen and pillows must be treated by other methods.

	.0 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment
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	.1 Where specific to the use, the instructions for safe disposal of the product and its packaging
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3.1.4.1	.2 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage
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3.1.4.1	•

3.1.5 General directions for use

3.1.5.1 Instructions for use

- Inform the authorization holder if the treatment is ineffective.
- Do not clean the treated area until the treatment is finished (up to 12 weeks with regard to the target organisms).
- Always dissolve the whole sachets for the application.

3.1.5.2 Risk mitigation measures

The product should not be applied in zone accessible to children and to pets.

- If it is applied on rooms accessible to children, children should not access treated areas until all necessary treatments and cleaning have been finalized.
- Remove all food, feed and drinks prior to treatment.
- Do not apply directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and livestock.
- To avoid indirect contamination during nearby application, cover all surfaces and facilities likely to be in contact with food, feed, drinks and animals.

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

- IF EXPOSED OR CONCERNED: Get medical advice/attention.
- IF INHALED: If symptoms occur call a POISON CENTRE or a doctor.
- IF SWALLOWED: If symptoms occur call a POISON CENTRE or a doctor.
- IF ON SKIN: Wash skin with water. If symptoms occur call a POISON CENTRE or a doctor.
- IF IN EYES: If symptoms occur rinse with water. Remove contact lenses, if present and easy to do. Call a POISON CENTRE or a doctor.
- Keep the container or label available.

3.1.5.4 Instructions for safe disposal of the product and its packaging

- Do not discharge unused products into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste in accordance with local regulations.

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

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3.1.7 Packaging of the biocidal product

Type of packaging	Size/volume of the packaging	Material of the packaging	Type and material of closure(s)	Intended user (e.g. professional, non- professional)	Compatibility of the product with the proposed packaging materials (Yes/No)
Bottle	1L	HDPE, PET or HDPE/EVOH*		Professionnal	Yes

Box	50 x 5 mL, 25	Polystyrene	-	Professionnal	Yes
	x 10mL or 10				
	x 25mL in				
	water soluble				
	sachets (PVA)				

^{*}EVOH = PVA : Polyvinyl alcohol

3.1.8 Documentation

3.1.8.1 Data submitted in relation to product application

Please see annex 1 for the complete list of the submitted studies.

3.1.8.2 Access to documentation

LODI S.A. has access to analytical methods on the active substance Etofenprox with a Letter of Access of Mitsui Chemicals Agro, INC.

3.2 Assessment of the biocidal product

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

Table 1. Intended use # 1 - Spraying by non professional users

Product Type	18		
Where relevant, an	Insecticides, acaricides and products to control other		
exact description of the	arthropods (Pest control)		
authorised use			
Target organism	Crawling insects including cockroaches (e.g. B. germanica,		
(including development	B. orientalis), adults and nymphs;		
stage)	Bed bugs (<i>Cimex lectularius</i>), adults and nymphs.		
Field of use	Indoor		
Application method(s)	Surface spraying		
Application rate(s) and	Product applications are made at a maximum rate of 0.5 mL/m ²		
	(equivalent to 0.15 g a.s./m ²). The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m ² . Residual efficacy: up to 12 weeks. 2 applications per year maximum.		
Category(ies) of users	Non-professionals		
Pack sizes and	Box Polystyrene wich contains 12 x 5 mL water soluble		
packaging material	sachets (PVA*)		

^{*}EVOH = PVA : Polyvinyl alcohol

Table 2. Intended use # 2 - Spraying by professional users

Product Type	18

Where relevant, an exact description of the authorised use	Insecticides, acaricides and products to control other arthropods (Pest control)
Target organism	Crawling insects including
(including development stage)	German cockroach (<i>B. germanica</i>), adults and nymphs. Oriental cockroach (<i>B. orientalis</i>), adults and nymphs Bed bugs (<i>Cimex lectularius</i>), adults and nymphs
	Tribolium confusum, adults Sitophilus oryzae, adults Rhyzopertha dominica, adults
	Oryzaephilus surinamensis, adults Lasioderma serricorne, larvae
Field of use	Indoor
Application method(s)	Surface spraying in public or private building and in food industries (food production line only)
Application rate(s) and	50 mL in 5 L of water to treat 100m ²
frequency	Product applications are made at a maximum rate of 0.5 mL/m² (equivalent to 0.15 g a.s./m²). The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1m². The residual efficacy is up to 2 weeks when applied on porous and non-porous against food-stored pests. The residual efficacy is up to 12 weeks when applied against bed bugs and <i>B. orientalis</i> on non-porous surfaces and porous surfaces (except for cockroaches).
Category(ies) of users	Professionals
Pack sizes and	HDPE, PET or HDPE/EVOH bottles: up to 1L
packaging material	PVA Water soluble sachets of 5 mL, 10 mL or 25 mL conditionned in PS box : Up to 250 mL (i.e. 50 sachets of 5 mL; 25 sachets of 10 mL or 10 sachets of 25 mL). *EVOH = PVA : Polyvinyl alcohol

3.2.2 Physical, chemical and technical properties

Concentration of uses: 1% v/v

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment
Physical state at 20 °C and 101.3 kPa Colour at 20 °C and 101.3 kPa Odour at 20 °C and 101.3 kPa	visual method	Test item: Etofenprox PESTANAL Batch n°: SZBB101XV	Translucent liquid with a slight odour.	Richerioux S. 2013, study LODI.09/20 13	Acceptable
pH value	CIPAC MT 75.3	Test item: Etofenprox 300 g/L EC Batch no: EC20130114 Etof	Etofenprox 300 g/L EC diluted at 1% m/V in distilled water has a pH value of 6.40 at 19.9°C.	Mériadec, E. 2013, report LODI.01/20 13	Acceptable
Acidity / alkalinity	CIPAC MT 191	Test item: Etofenprox 300 g/L EC Batch no: EC20130114 Etof	The acidity of Etofenprox 300 g/L EC calculated as H2SO4 was determined to be 0.00736 % m/m at 19.9°C, but it is not necessary.	Mériadec, E. 2013, report LODI.01/20 13	Acceptable
Relative density / bulk density	Pycnometer measureme nt	Test item: Etofenprox 300 g/L EC Batch no: EC20130114 Etof	D = 1.031 \pm 0.001 (Density is dimensionless, density of test item at 21 °C relative to the density of water at 4°C).	Demangel, B. 2013, report 13- 912011- 004	Acceptable
Storage stability test - accelerated storage	Method for quantitation of AS is validated in	Test item: Etofenprox PESTANAL	Appearance of commercial packaging: Initial After 14 After 21 days days at 54°C at 54°C	Richerioux S. 2013, report	Tests for pH and emulsion characteristic s (at the

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results				Reference	Comment
	the study LODI.04/20 12 CIPAC MT	Batch no: SZBB101XV Test item:	PET bottle	White round bottle. No leak White round	No change, no deformation No change,	No change, no deformation No change,	LODI.07/20 13 Richerioux S. 2013,	lowest and highest use concentratio n) should be
	46.3 CIPAC MT	Etofenprox 300 G/L EC	HDPE bottle		no deformation	no deformation	report LODI.08/20	determined in all
	75.3	Batch no: IN0191114	PS Box	White square box made in PS* with lid	No change, no deformation, dry box	No change, no deformation, dry box	13	packaging types. Consequently , the
			Water soluble sachets	Tranparent water soluble sachet. No leak	No change, no deformation.	No change, no deformation	Doyen A. 2015, DEFITRACE	following data are still missing: -pH
			Plastic bag	Dry rectangular transparent plastic bag	No change, no deformation.	No change, no deformation	S report No. 15- 912011- 003	determinatio n of the product stored in HDPE and
			AS content in PET bottle	30.91	30.85	31.07		HDPE and water soluble bags -emulsion
			% variation	-	-0.19%	+0.52		characteristic s of the
			AS content in HDPE bottle	30.91	31.02	30.81		product stored in HDPE and
			% variation	-	+0.36	-0.32		PET, and
			AS content in water soluble sachets	30.73	30.70	30.39		diluted at 1% v/v As these tests should

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Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	Comment
			% variation	-	-0).1	-1.11		be covered by the long
			*Polystyrene						term storage
			pH determination	n of the prod					study (3 years), no
				Initial	After days 54°	at	After 21 days at 54°C		other data is required.
			pH 1% (w/v) in Std water D	6.45 at 20.8°C	5.97 20.9		6.00 at 21.5°C		
			After 14 days at	: 54°C in wate	er solub	le bags	<u>5</u>		Regarding
				Initia	ı	Afte	r 14 days at 54°C	Doyen A. 2015,	other packages,
			Appearance	Homogen yellow limpi			change, no eformation	DEFITRACE S report No. 15-	emulsion characteristic s of the
			Packaging	Water so transparer		tr	ater soluble ansparent rdened bag	912011- 001	product diluted at 1% should be
			% weight variation	/			-0.7%		provided in all
			Emulsion characteristic s: After 30": Emulsificatio n After 30'		30°C: eous e liquid.	wate How white	v/v in std er A at 30°C: mogeneous opaque liquid.		packaging. Considering that emulsion properties are not
			After 30 After 2h After 24h Re-emul After 30'	1% v/v i water D at Homogen white opaqu	30°C: eous	wate Ho	o v/v in std er D at 30°C: mogeneous opaque liquid.		supposed to be disturbed by the packaging, we consider results of the

Property and	ideline d the test substant (% (w/v				Reference	Comment
CIPA 36.3	PAC MT Test item	Persistent foaming Dissolution rate of wate soluble bags Emulsion stabi glass flask Emulsion characteristics After 30 min After 2h Re-emul. after 30 sec Final emulsion after 30 min	lity after storage for 1 25% v/v in water D Initial: Homogeneous white opaque liquid Homogeneous white opaque liquid Homogeneous white opaque liquid 1 mL of sedimentation Homogeneous white opaque liquid Homogeneous white opaque liquid	1% v/v in std water D 10": 22 mL 1': 17 mL 3': 12 mL 12': 10 mL 1st assay: 14" 2nd assay: 15" 4 days at 54°C in 25% v/v in water D Initial: Homogeneous white opaque liquid Homogeneous white opaque liquid Homogeneous white opaque liquid 1 mL of sedimentation Homogeneous white opaque liquid 1 mL of sedimentation Homogeneous white opaque liquid Homogeneous white opaque liquid	Tallon A. 2016, study n° LAB2016- 01 (non GLP) Richerioux S. 2013, report LODI.01/20 15	test could be applicable to other packages.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Results		Reference	Comment
				Initial	After 21 days at 54°C		
			Product aspect	Translucent pale yellow liquid	No change		
			PET bottle	White round bottle and opaque with a white cap. Clean bottle.	No change, no deformation		
			PET bottle % variation content	/	-0.068%	Tallon A. 2016, study	
			Product aspect	Translucent pale yellow liquid	No change	n° LAB2016-	
			HDPE measuring bottle	Oval bottle and slightly opaque with two caps. Clean bottle.	No change, no deformation	01 (non GLP)	
			% variation content HDPE measuring bottle	/	-0.065%		
			Emulsion stability glass flask	after storage for 21	days at 54°C in		
			Emulsion characteristics	water D Initial: Homogeneous	25% v/v in water D Initial: Homogeneous white opaque liquid		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results			Reference	Comment
			After 30 min	Homogeneous white opaque liquid	Homogeneous white opaque liquid		
			After 2h	Homogeneous white opaque liquid	Homogeneous white opaque liquid		
			After 24h	1 mL of sedimentation	Homogeneous white opaque liquid		
			Re-emul. after 30 sec	Homogeneous white opaque liquid	Homogeneous white opaque liquid		
			Final emulsion after 30 min	Homogeneous white opaque liquid	Homogeneous white opaque liquid		
Storage stability test - long term storage at ambient temperature	Method for quantitation of AS is validated in the study LODI.04/20 12	Test item: Test item: V33 traitement multi usages Batch n°: 04020920PT	Storage in commo	ercial packaging m	naterial	Richerioux S. 2013, report LODI.10/20 13 Richerioux S. 2013, report LODI.13/20 13	Acceptable The product is stable after 3 years storage at ambient temperature. Chemical stability and

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results				Reference	Comment
				Initial	After 18 months at 20°C	After 24 months at 20°C		packaging stability (e.g. studies LODI.11/201
			PET bottle	White round bottle. No leak.	No change, no deformation	No change, no deformation		3 and LODI.14/201 3) and stability of
			HDPE/EVOH bottle	White round bottle. No leak.	No change, no deformation	No change, no deformation		the physical and technical properties
			PS* Box	White square box made in PS* with lid	No change, no deformation, dry box	No change, no deformation, dry box		(e.g. LAB 2016-03 and LODI.22/201 5) are
			Water soluble sachets**	Transparent water soluble sachet. No leak	No change, no deformation.	No change, no deformation		considered demonstrate d.
			Plastic bag	Dry rectangular transparent plastic bag	No change, no deformation.	No change, no deformation		Persistence of foam test was carried out
			AS content in PET bottle	30.91	31.21	31.04		separately (see below).
			% variation	-	+1.40	+0.55		
			AS content in HDPE bottle	30.91	30.56	30.92		
			% variation	-	+0.10	-0.03		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	Comment
			AS content in water soluble sachets**	30.73	30.32		30.11		
			% variation	-	-1.33		-2.02		
				*polystyrene; **polyvinyl alcohol					
			Intermediate report in commercial packaging						
I				Ini	tial	Arte	er 18 months at 30°C		
			PET bottle	PET bottle White round bottle. No leak		C	change, no leformation		
			HDPE/EVOH bottle White round bott No leak		leak	deformation			
			PS* Box	made in	made in PS* with deformation, dr lid box				
			Water soluble sachets	soluble s	Tranparent water soluble sachet. No leak No change, no deformation.				
			Plastic bag	transpare	tangular ent plastic ag		change, no eformation.		
			Content of AS in PET bottle		.91		30.77		
			% variation		-		-0.45		
			Content of AS in HDPE bottle	30	.91		30.32		
			% variation		-		-1.91		
			Content of AS in water soluble sachets	30	.73		29.65		
			% variation		-		-3.51		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results				Reference	Comment
			*polystyi					
	GIFAP Monograph	ETOFENPROX 300 G/L	<u>Packagin</u>	g stability	Richerioux S. 2016,			
	n°17	Batch EC 20130114Eto	Initial After 3 After 3 years at 20°C 30°C				Study No LODI.11/20 13	
		f Batch EC 20130114Eto f-d	PET bottle	White round bottle. No leak of the bottle or the cap	No leak or deformation	No leak or deformation	Richerioux S. 2016, Study No LODI.14/20	
			PEHD/ EVOH bottle	White round bottle. No leak of the bottle or the cap	No leak or deformation	No leak or deformation	13	
			PS box	White square box made in polystyrene with lid	Dry box. No hole or deformation	No trace of sample. Dry box. No hole or deformation		
			Water solubl e sachet	Transparent water soluble sachet. No leak	No leak or seepage	No leak or seepage		
			Plastic bag	Dry rectangular transparent plastic bag	Dry bag. No trace of sample	Dry bag. No trace of sample		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results				Reference	Comment
			Chemical sta	•				
				oatch EC201301 and PET bottles	<u>d in</u>			
				Initial				
			Aspect	Translucent liquid with slight odor				
			Chemical stability	1				
			%variatio n	/	-1.94% (PEHD/EVOH) -2.20% (PET)	-1.91% (PEHD/EVOH) -3.82% (PET)		
			Results for t	oatch EC201301 et:	ged in water			
				Initial				
			Aspect	Aspect Sight odor S0°C 30°C Unchanged Unchanged				

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Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	S					Reference	Comment		
			Chemi stabilit	1 311	73%	30.29%	29	.72%				
			%varia	atio	/	-1.43%	-3	.29%				
			LODI.04	nalytical method for AS content validated in study ODI.04/2012. nitial results extracted from study LODI.07/2013.								
		Test item: Etofenprox 300g/L EC	IIIIcidi 1	<u>esares extra</u>	<u>ecca </u>	<u> </u>	1107/2013	<u>.</u>	Richerioux S. 2018, report			
		Batch n°: EC20150122	EC20150122 Etof	EC20150122		Initial	After 12 month s at 30°C	After 18 month s at 30°C	After 24 months at 30°C	After 36 month s at 30°C	LODI.02/20 15	
			1L HDPE bottle	Round, opaque and white bottlewith a white cap.	White round bottle. No leak. The bottle is slightly digged	White round bottle. No leak. The bottle is slightly digged	White round bottle. No leak. The bottle is slightly digged	White round bottle. No leak. The bottle is slightly digged				
			Sample aspect	Translucen t light yellow liquid		No change,	No change,	No change,				

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results						Reference	Comment
			Weight (g)	1077.46	1077.3 4	1077.2 0	1077.05	1076.6 9		
			% variati on	/	-0.01%	-0.02%	-0.04%	-0.07%		
			biocida	e in commer I product we ing bottle:						
				Initial	After 12 month s at 30°C	After 18 month s at 30°C	After 24 months at 30°C	After 36 month s at 30°C		
			250mL HDPE bottle	Round, opaque and white bottle with two white caps.	White round bottle. No leak. The	White round bottle. No leak. The	White round bottle. No leak. The bottle is	White round bottle. No leak. The		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Result	s	Reference	Comment				
			Sample		bottle is slightly digged No change,	bottle is slightly digged No change,	slightly digged No change,	bottle is slightly digged No change,	Richerioux S. 2018, report	
			weight	yellow liquid 312.22	312.26	312.27	312.28	312.29	LODI.14/20 14	
			% variati on	/	0.01%	0.02%	0.02%	0.02%		

Property	Guideline and Method	Purity of the test substance (% (w/w)	test Results							Commen
				Initial	After 12 month s at 20°C	After 18 month s at 20°C	After 24 months at 20°C	After 36 month s at 20°C		
			1L HDPE bottle	Round, opaque and white bottlewith a white cap.	White round bottle. No leak.	No change, no deform ation	No change, no deformati on	No change, no deform ation		
			Sampl e aspect	Translucen t light yellow liquid	No change,	No change,	No change,	No change,		
			Weight (g)	1068.64	1068.8 1	1068.8 4	1068.87	1069.0 2		
			% variati on	/	0.02%	0.02%	0.02%	0.04%		
				Initial	After 12 month s at 20°C	After 18 month s at 20°C	After 24 months at 20°C	After 36 month s at 20°C		
			250 mL	Round, opaque and white	White round bottle.	No change, no	No change, no	No change, no		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results						Reference	Comment
			HDPE bottle	bottle witl two white caps.	e leak.	deform ation	deformati on	ation		
			Sample aspect	Transluce t light yellow liquid	n No change,	No change,	No change,	No change,		
			Weight (g)	313.84	313.94	313.98	314.01	314.1		
			% variati on	/	0.03%	0.04%	0.05%	0.08%		
	CIPAC MT36.3	Etofenprox 300 g/L EC (diluted at 1%)	polyeth Test wa at 20°C	ylene cap. is perform C±2°C.	ored in poly ed before and or v/v in CIP	Tallon 2019 Study N° LAB2016- 03	Acceptable. Emulsion is stable for 36 months at 1% v/v in polyethylene.			
				Assay		Te water	T initial			However stability of
			Volu	ıme of test	t item (mL)		1.0			emulsion and
			Initial emulsification Homogeneous who Observation after 30s					white		re- emulsificatio n after long
			stabi	lity on	After 30 mi	n Hoi	mogeneous liquid	white		term storage at ambient
				nding	After 2h		mogeneous liquid			temperature in PET and
				mulsification	on: after 24 after 30s	h Hoi	mogeneous liquid	s white		water soluble bags are missing.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	Comment	
				sion stability	Homogeneous white		Considering
			Observation	after 30 min	liquid		that emulsion properties
			At 6 months (19 months and 36		vater D), 12 months, 24		are not supposed to be disturbed
				y No.	T 6 months, 12 months, 24 months, 36 months		by the packaging
			Volume of te	est item (mL)	1.0		between HDPE and
				ulsification on after 30s	Homogeneous white liquid		PET, we consider
			Emulsion stability on	After 30 min	Homogeneous white liquid		results of the test could be
			standing	After 2h	Homogeneous white liquid		applicable to PET packaging.
				tion: after 24h on after 30s	Homogeneous white liquid		As emulsion
			Final emulsion stability Observation after 30 min		Homogeneous white liquid		stability data in water soluble bag
							after accelerated storage and data on long term stability in HPDE were found acceptable. We consider results of the

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment		
	CIPAC MT	Etofenprox	pH determination afte	er 3 years of storage	at 30°C±2°C	Tallon 2018	applicable to water soluble packaging. Acceptable.
	75.3	300 g/L EC	The test item was sto a polyethylene cap du	red in polyethylene l		Study N° LODI.22/20	pH is stable after 3 years
			Т	pH (1%)	Temperature °C	15	of storage at 30 °C in polyethylene
			T0	5.67	19.6		bottle.
			T 6 months	5.18	18.9		
			T 12 months	4.93	19.5		Considering that pH is not
			T 18 months	5.16	18.9		supposed to
			T 24 months	5.17	19.9		be disturbed
			T 36 months	5.28	20.2		by the
						packaging and results from accelerated storage study in PET, we consider results of the test could be applicable to PET and water soluble bags packaging.	
Storage stability test - low temperature	CIPAC MT 75.3	Test item: ETOFENPROX 300 g/L EC	Storage in closed glas	ss bottle		Doyen A. 2015, report n°	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment		
stability test for liquids	CIPAC MT 36.3	Batch no: EC20141127 Etof	Appearance Emulsion stability of 1% w/v in std water A at 30°C initially after 30 minutes after 2 hours after 24 hours after reemulsification after 24 h 30 minutes after the re-emulsification Emulsion stability of 1% w/v in std water D at 30°C	Homogeneous Homogeneous Homogeneous Homogeneous with white deposit of <1 mL Homogeneous Homogeneous	After 7days at 0°C No change Homogeneous Homogeneous Homogeneous with white deposit of <1 mL Homogeneous Homogeneous	14-912011-	The preparation is stable at low temperature.

Property Guidand Meth	cuhctana	ce	Results					Reference	Comment							
CIDAC	AC MT. Took itom		initially after 30 minute after 2 hours after 24 hours after re- emulsification a 24 h 30 minutes afte the re-emulsificatio pH at 1%w/v in water D	after er on n std		Homogeneous Homogeneous Homogeneous Homogeneous with white deposit of <1 mL Homogeneous Homogeneous		DOVEN A								
39.3	3 ETOFENPI 300 g/L AC MT Batch n°	ETOFENPROX 300 g/L Batch n° IN0240116 App	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	ETOFENPROX 300 g/L Batch n°	Storage in white Appearance		Initial	After 7 days at 0°C Homogeneous		DOYEN, A. 2016, report No 16-912011- 003 (GLP)	
			Emulsion characteristic	yellov 25%	v/v in water D	yellow limpid liquid 25% v/v in water D and A at 30°C										
						Homogeneous white opaque liquid										
						Homogeneous white opaque liquid										

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	Comment	
			Final emulsion after 30 min	Homogeneous white opaque liquid	Homogeneous white opaque liquid		
Effects on content of the active substance and technical characteristics of the biocidal product - light			Active substance	e is not light sensitive	e.		The packaging is opaque than can reduce the impact of light on the product. Moreover, the active substance is not sensitive to light. Therefore, no degradation of the product by the light is expected. Acceptable
Effects on content of the active substance and technical characteristics of the biocidal product – temperature and humidity			See accelerated The product is s	storage stable at temperature	and is a liquid.		Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment
Effects on content of the active substance and technical characteristics of the biocidal product - reactivity towards container material			See results of storages above. Packagings are stable and compatible with the product.		Acceptable
Wettability Suspensibility, spontaneity and dispersion stability Wet sieve analysis	-	-	-	-	-
and dry sieve test Emulsifiability, re- emulsifiability and emulsion stability	CIPAC MT 36.3 (visual method)	Test item: ETOFENPROX 300 G/L EC Batch: EC20130114 Etof ETOFENPROX 300 g/L Batch IN0260316	Emulsion stability of 1% w/v dilution Emulsion stability of 1% w/v in std water A at 30°C initially	Doyen A. 2015, report n° 14-912011-004 Tallon A. 2016, study n° LAB2016-03 (no GLP) Tallon A. 2016, study n° LAB2016-02 (no GLP)	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	Comment
			Emulsion stability after 30 min after 2h after 24h Re-emulsification after 30 sec Final emulsion after 30 min Emulsion stability of 25% v/v dil Initial emulsification after 30	Homogeneous Homogeneous with white deposit of <1 mL Homogeneous with white deposit of <1 mL Homogeneous Homogeneous Homogeneous Homogeneous white liquid Homogeneous white		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment	
			after 30 min after 2h after 24h	Homogeneous white opaque liquid		
			after 30 sec	Homogeneous white opaque liquid Homogeneous white		
Disintegration time	-	-	-	opaque liquid	-	-
Particle size distribution, content of dust/fines, attrition, friability	-	-	-		-	-
Persistent foaming	CIPAC MT 47.1	Test item: ETOFENPROX 300 G/L EC Batch EC 20130114Eto f ETOFENPROX 300 G/L EC Batch IN0191114	CIPAC MT 47.1 1% v/v in standard water D 3': Test temperature: 20 ± 2°C Persistent foaming CIPAC MT 47.2 1": 1% v/v in standard water D 3':	: 0 mL : 17 mL 13 mL	Doyen A, 2013, report n°13- 912011- 005 Doyen A. 2015, DEFITRACE S report No. 15- 912011- 001	Acceptable
					Doyen, A. 2016, study No 16-	

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Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment
				912011- 003	
Pourability	-	-	-	-	-
Burning rate — smoke generators	-	-	-	-	-
Burning completeness — smoke generators	-	-	-	-	-
Composition of smoke — smoke generators	-	-	-	-	-
Spraying pattern — aerosols					
Physical compatibility	-	-	-	-	-
Chemical compatibility	-	-	-	-	-
Degree of dissolution and dilution stability	-	-	-	-	-
Surface tension	EC A5 Method OECD Guideline 115	Test item: ETOFENPROX 300 G/L EC Batch: EC20130114 Etof	The surface tension was found to be 34.8 \pm 0.4 mN/m at 20.1°C \pm 0.1°C (1% v/v dilution).	Benjamin, D., 2013 report 13- 912011- 003	Acceptable The preparation is surface active.
Viscosity	OECD Test Guideline 114 (Viscosity of Liquids)	Test item: ETOFENPROX 300 G/L EC Batch: EC20130114 Etof	The dynamic viscosity of Etofenprox 300 g/L EC is 39cP (=37.83 mm²/s) at 20.0°C ± 0.2°C.	Meriadec, E.2013, report LODI.04/20 13	Acceptable. Viscosity at 40 °C was not determined.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comment
					However, the composition is sufficient to conclude that the product is not classified for aspiration hazard, therefore the determination of the viscosity at 40 °C is not necessary.

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

The product FENOX is an emulsifiable concentrate (EC). All studies have been performed in accordance with the current requirements and the results are deemed to be acceptable.

The appearance of the product is a translucent liquid with a slight odour. In aqueous solution (1% dilution), it has a pH value of 6.40 at 19.9°C.

There is no effect of low and high temperature on the stability of the formulation, since after 7days at 0°C or after 14 days at 54 °C, neither the active ingredient content nor the technical properties were changed. The product is considered stable after 3 years at ambient temperature.

Its technical characteristics are acceptable for an EC formulation.

3.2.3 Physical hazards and respective characteristics

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comments		
Explosives	Statement	-	An evaluation of the structural groups in the structural formula of each substance, including the oxygen balance, establishes beyond reasonable doubt that the product is incapable of rapid decomposition with evolution of gas release of heat. Therefore, testing according to EU Method A.14 for explosive properties is not required. Etofenprox 300 g/L EC has no potential for explosivity.	LODI.05/20 13+am1	The energy decomposition is higher than 300J/g, but less than 500J/g. The product is		
	DSC screening test	Test item: Etofenprox 300 g/L EC Batch: LAB0308202 101	At 394°C, an exothermic peak was recorded with an energy around 460J/g.	Lecomte L., 2021 Report 21- 912011-002	not considering explosive based on the		
Flammable gases	-	-	Not required as the product is a liquid product.	-	-		
Flammable aerosols	-	-	Not required as the product is a liquid product.	-	-		
Oxidising gases	-	ı	Not required as the product is a liquid product.	-	-		
Gases under pressure	-	-	Not required as the product is a liquid product.	-	-		
Flammable liquids	EU Method A9 ISO Standard 3679.	Etofenprox 300 g/L EC	The product Etofenprox 300 g/L EC is not flammable. The flash point of Etofenprox 300 g/L EC was determined according to EU Method A9 and ISO Standard 3679. The flash point of Etofenprox 300 g/L EC was 137.0 \pm 0.5 °C (corrected value).	2013, report 13-912011-	The product is not classified as flammable according to CLP regulation.		
Flammable solids	-	-	Not required as the product is a liquid product.	-			

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Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comments
Self-reactive substances and mixtures	DSC screening test	Test item: Etofenprox 300 g/L EC Batch: LAB0308202 101	At 394°C, an exothermic peak was recorded with an energy around 460J/g.	Lecomte L., 2021 Report 21- 912011-002	Acceptable The product is not classified as self- reactive.
	SADT Test H4	Test item: Etofenprox 300 g/L EC Batch Number 97233 (400028513)	The maximum heat accumulation temperature of the SADT H.4 test is over 75°C. The substance is therefore exempt from classification as a self-reactive substance of UN Class 4, Division 4.1.	K. Arif, 2022 GLP301601 1702R1/202 2	
Pyrophoric liquids	-		Experience in use shows that the product is not pyrophoric		Acceptable
Pyrophoric solids	-	-	Not required as the product is a liquid product.	-	Acceptable
Self-heating substances and mixtures	-	-	Not required as the product is a liquid product.	-	Not totally correct. On the other hand, it is recognized that liquids have a low contact surface with air and are generally not classified for this hazard.
Substances and mixtures which in	-	-	The product is intended to be used after dilution in water and experience in use shows no emission of gases.	-	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comments
contact with water emit flammable gases					
Oxidising liquids	Statement	-	The principle of this study was to have information on chemical formula and hydrodynamics of each ingredient in Etofenprox 300 g/L EC in order to assess if the formulation is capable of reactive exothermically with combustible materials and if it has oxidising properties. No component of Etofenprox 300 g/L EC is associated with oxidising properties therefore the formulation is not classified for oxidising properties.	S. 2013, study LODI.08/20	The product does not contains components classified Ox.1, Ox.2 or Ox.3 and oxygen are linked to carbons or hydrogens only, therefore, the product is not classified as oxidising liquid according to CLP regulation.
Oxidising solids	-	-	Not required as the product is a liquid product.	-	
Organic peroxides	-	-	Not required as the product is a liquid product.	-	
Corrosive to metals	Statement	_	 According to CLP regulation, a product is not classify corrosive to metal if: substances and mixtures have no acidic or basic functional groups (i.e. neutral pH) substances or mixtures does not containing halogen; substances not able to form complexes with metals and mixtures containing such substances. 		According to CLP regulation, the product is not expected to have corrosive to metal properties.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	Comments
			The product has a neutral pH (no acidic/basic agent) and does not contain halogen nor complexing agents.		
Auto-ignition temperatures of products (liquids and gases)	EEEC A15	Test item: Etofenprox 300 g/L EC Batch n°: EC2013011 4Etof	The mean self-ignition temperature of the test item was 430 \pm 8 $^{\circ}\text{C}$	A. DOYEN,, 201 No. 13- 912011- 0023	Acceptable The product is not classify having autoignition properties.
Relative self-ignition temperature for solids	-	-	Not required as the product is a liquid product.	-	
Dust explosion hazard	-	_	Not required as the product is a liquid product.	-	

Conclusion on the physical hazards and respective characteristics of the product

The formulation is not classified for the physico-chemical aspect.

3.2.4 Methods for detection and identification

Principle of the analytical method:

Into a 50mL volumetric flask, weight about 0.2g of Etofenprox 300g/L EC and make to volume with acetonitrile for GC, active substance is quantified by a GC method using a FID detector. An internal standard method is used for this quantification.

Analytical	Analytical methods for the analysis of the product as such including the active substance, impurities and residues									
Analyte (type	Analytical	Fortification range	Linearity	Specificity	Recovery i	ate (%)	Limit of	Reference		
of analyte e.g. active substance)	method	/ Number of measurements			Mean	RSD	quantification (LOQ) or other limits			
Etofenprox	GC/FID	50% of ai content in product –	N=5 (in triplicates)	No interferences	103.3% at	At 1.22g/L (n=18), mean	-	Richerioux S., 2012, final report		

15.54% w/w	From 0.96	chromatogra	15.54%	RSD=0.60	n°
(n=3)	to 1.44 g/L	ms were	w/w	%	LODI.04/201
100% of ai	Y=2.26456	provided	103.5%		2
content in product	x+0.00449		at		
- 30.49% w/w	$R^2 = 0.9996$		30.49%		
(n=3)			w/w		
150% of ai			101.6%		
content in product			at		
- 45.48% w/w			45.48%		
(n=3)			w/w		

Analytical m	Analytical methods for monitoring, soil, water, air, foodstuff or plant and animal origins and human tissues and body fluids								
Analyte (type	-		Linearity	Specificity	Recover	y rate (%)	Limit of	Reference
of analyte e.g. active substance)	method	/ Number of measurements			Range	Mean	RSD	quantification (LOQ) or other limits	

Analytical methods for Etofenprox residues in soil, air and water are available in Assessment Report Etofenprox Product-type 18 (September 2013). A letter of access from Mitsui Chemicals Agra. INC has been provided.

Validation data are available in Annex 2.

Conclusion on the methods for detection and identification of the product

An analytical for the determination of active substance in the biocidal product was provided and validated.

Analytical methods for monitoring in soil, water, air, foodstuff or plant and animal origins and human tissues and body fluids are provided at EU level (CAR of active substance).

3.2.5 Efficacy against target organisms

3.2.5.1 Function and field of use

MG 03: Pest Control

Product Type 18: Insecticides, acaricides and products to control other arthropods.

FENOX is an emulsifiable concentrate used diluted in water or undiluted and is intended to be used against crawling insects including cockroaches, bed bugs and some stored goods attacking insects, indoor in private homes (professionals and non-professional users), public buildings and in food industries (professional users).

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

The product is intended to be used against the following target organisms:

- Indoor use by non-professional users against:
 - Crawling insects including cockroaches (*B. germanica, B. orientalis*), adults and nymphs;
 - Bed bugs (C. lectularius), adults and nymphs;
- Indoor use, by professional users, against:
 - Crawling insects including cockroaches (*B. germanica, B. orientalis*), adults and nymphs;
 - Bed bugs (C. lectularius), adults and nymphs;
 - Confused flour beetle (T. confusum), adults;
 - Rice weevil (S. oryzae), adults;
 - Lesser grain borer (R. dominica), adults;
 - Sawtoothed grain beetle (O. surinamensis), adults;
 - Tobacco beetle (*L. serricorne*), larvae.

Application rate: at a maximum rate of 0.5 mL/m^2 . The product is used diluted in water at a rate of 0.5 mL of product diluted in 50 mL water for 1 m^2 .

3.2.5.3 Effects on target organisms, including unacceptable suffering

Target insects are knocked down and killed upon contact with the active ingredient.

3.2.5.4 Mode of action, including time delay

According to the Assessment report of the active substance (Sept. 2013), etofenprox shares its mode of action with other pyrethroid derivatives. It is an insecticide acting by direct contact and ingestion. It acts on sodium channels of the insect nervous system by disturbing the normal neurotransmittance.

The effect begins around a few minutes after direct spraying and around a few hours after contact with treated surfaces, in the laboratory trials submitted by the applicant.

3.2.5.5 Efficacy data

The following table summarises the efficacy studies submitted with the product FENOX by the applicant.

		Expe	rimental data o	n the efficac	y of the biocidal product against targ	get organism(s)	
Function	Field of use	Test	Test	Test	Test system / concentrations	Test results: effects	Referenc
	envisaged	substance	organism(s)	method	applied / exposure time		е
PT18	Indoor Crawling insects Surface treatment	FENOX (etofenprox 300 g/L)	B. germanica (adults)	Laboratory test Dose range testing CEB n°135		16% and 27% mortality in 24h respectively on porous and non-porous surfaces. 10 mL/L water per 20m ² : 100% KD within 1h on concrete and within 45min on ceramic. 100% mortality in 24h. 20 mL/L water per 20m ² : 100% KD within 45min on both	Serrano (Feb. 2016) Report 2055e- DRT- SIM/0316 R
PT18	Indoor Crawling insects Surface treatment	FENOX (etofenprox 300 g/L)	B. germanica (adult males)	Laboratory test CEB nº135	Time to knockdown all insects (KT100) and the mortality after 24h was assessed. Typical surfaces treated measured 15cmx15cm (concrete and ceramic tiles) Temp.: 20 to 21°C R.H.: 63 to 72% 1h of exposure time after complete drying (4h) 4 replications (25 insects per replicate) Application rate: 0.5 mL Fenox into 19.5 mL water on 1 m² => 150 mg a.s./m²	100% KD within 1h. 100% mortality within 24h. Application rate validated: 0.5 mL Fenox into 19.5 mL water on 1 m ²	Serrano (March 2015) Report 1889/021 5R RI=1

PT18	Indoor Crawling insects Direct spray Surface treatment Residual efficacy	FENOX (etofenprox 300 g/L)	Blatta orientalis (adults, 3rd instar nymphs) Cimex lectularius (adults, last instar nymphs)	Laboratory test CEB n°135 / 159	DIRECT SPRAY TEST: Product was directly sprayed onto the test organisms at the dose of 50mL/m². KT100 and mortality after 24h were assessed. SURFACE TREATMENT: Room of 60 m³ 15cmx15cm wooden, steel, concrete and ceramic tiles Temp.: 20-25°C R.H.: 65 to 78% Smooth ventilation: 1m³/h 1h of exposure time after complete drying (2h) Tested residual efficacy: 4, 8 and 12 weeks depending on the test organisms. Storage of the panels at 22±2°C and 70±5% R.H., under a photoperiod of 16h light (1200 lux) and 8h darkness. 4 replicates of 25 adults mixed sex + 4 replicates of 25 nymphs	Direct spray test: 100% KD within 30 seconds for all test organisms except B. orientalis (1 min). 100% mortality within 24h. Surface treatment / residual spray trial: 100% mortality was achieved within 24h until 12 weeks for all test organisms on both porous and non-porous surfaces. Application rate validated: 50mL Fenox into 5L water per 100m² => 0,5 ml/m² Ageing up to 12 weeks shows increasing KD times up to 24h on Oriental cockroaches in porous surfaces (absorbent materials).	Serrano (May 2016) Report 2055c-F- LAB/0316 R RI=1
PT18	Indoor Stored- product pests Crawling insects Surface treatment Residual efficacy	FENOX (etofenprox 300 g/L)	C. lectularius (adults) Stored-product pests: T. confusum S oryzae S. granarius R. dominica O. surinamensis L. serricorne 2 to 4 weeks adults (except for tobacco	Laboratory test CEB n°135bis / 106 Field study for stored- products pests.	Application rate: 50mL Fenox into 5L water per 100m² The test was conducted in a real empty storage premise (138m² and 691m³). Pests were not exposed directly to the product but inside boxes (35x25x15cm). The treatment room was kept in controlled climatic conditions: 21±2°C, 65±10% R.H., light 1200 lux. For surface treatment, the product was applied using a pressurized sprayer at the dose of 50mL in 5L on 100m². The residual efficacy of the product was assessed right after treatment	100% KD after 1h exposure for all test organisms. 2 weeks after treatment: 100% KD, 4h after exposure for all stored products pests. 12 weeks after treatment: 100% KD, 4h after exposure for <i>C. lectularius</i> . 100% mortality was achieved within 24h after treatment for all test organisms, until 2 weeks for stored goods attacking insects and until 12 weeks for bed bugs.	Serrano (May 2016) Report 2055f-F- FI/0316R RI=2

			beetle - last instar larvae)		and, depending on the target organisms, 2 weeks later. Assessment of KD and mortality after 1h exposure to the treatment. Application: surface treatment in 5 replicates each. For each replicate, the boxes containing the 25 insects were placed in 4 locations inside the test room (2 batches at 1.80m height and 2 on the floor, but not closer than 50cm from the walls). For Stored product pests, 100g of grain containing 25 adults (or larvae) were placed in boxes. The other target organisms were placed in a plastic box containing one shelter, food and water sources, a gauze net allowing air exchanges and a cardboard on the top of the box in order to represent cracks and crevices.	Application rate validated: 50mL FENOX into 5L per 100m² => 0,5 ml/m²	
PT18	Indoor Crawling insects Cockroaches Surface treatment Residual efficacy	FENOX (etofenprox 300 g/L)	B. germanica	Field study CEB n°249	Control of natural infestations in multi-family public housing. 10 apartments (60m²): 5 treated + 5 controls. For each treatment, only the kitchen was treated (12m² for all apartments), and the weight used was recorded. The product was applied in the preferred insect's locations (and unreachable to humans and pets) as: under the fridge, under the kitchen sink, under the oven and the waterheater, on all cracks and crevices that can be an harbourage for cockroaches Assessments (sticky traps) were done 1, 7, 14, 30, 60 and 90 days after treatment.	Population reduction D1 = 57% D7 = 86.4% D14 = 92.5% D30 to D90 > 95% Application rate validated: 50mL Fenox into 5L water per 100m² => 0,5 ml/m² The natural population evolution recorded in the untreated buildings proved an increasing along the trial (12.5% at the end of the trial).	Serrano (June 2015) Report 1894- 1a/0215R RI=1

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					Application rate: 50 mL Fenox into 5L of water per 100m ² => 6ml of product in 600 ml water on the 12m ² kitchen area.								
PT18	Indoor Crawling insects Cockroaches Surface treatment Residual efficacy	FENOX (etofenprox 300 g/L)	B. orientalis	Field study CEB n°249	Control of natural infestations in premises (restaurants, bakeries, butcheries). 10 premises (12 to 62m²): 5 treated + 5 controls. Assessments (sticky traps) were done 1, 7, 14, 30, 60 and 90 days after treatment. The product was applied in the preferred insect's locations (and unreachable to humans and pets) as: under the fridge, under the kitchen sink, under the oven and the waterheater, on all cracks and crevices that can be an harbourage for cockroaches Application rate: 50 mL Fenox into 5L	D1 D7 D14 D30 App	= 67.7 = 82% 4= 89. 0 to D9	% 3% 90 >95 on rate o 5L wa	% valida	ated: 5 er 100		>	Serrano (June 2015) Report 1894- 1b/0215R RI=1
PT18	Indoor Crawling insects Bed bugs Surface treatment Residual efficacy	FENOX (etofenprox 300 g/L)	C. lectularius	Field study Internal method	water per 100 m² Control of natural infestations in apartments and hotel rooms. 8 sites: 5 treated + 3 controls. For each treatment, only the bedroom (from 12 to 28 m²) have been treated, and the weight used was recorded. The product was applied in the preferred insect's locations (and unreachable to humans and pets) as: under the bed on the floor and foot of the bed (head side) / in the crevices and cracks of the plinth at the	Control Fenox	1 2 3 4 5 Mean 6	Pre-trapping 7 15 9 17 13 12.2 8 12 10 10	D1 Total 0 1 0 1 2 0.8 10 11 7 9.3	% red 100 93.3 100 94.1 84.6 94.4 -25 8.3 30 4.4	D90 Total 0 0 0 1 0 0.2 9 10 11	% red 100 100 94.1 100 98.8 -12.5 16.7 -10 -1.9	Serrano (June 2015) Report 1894- 6/0215R RI=2
					junction of the floor and the wall / on the mattress / on the bed structure at the head of the bed / on all cracks	redu	uction	exceed	ds 90°	oulatior % relat	ive to	0	

		_	ı		T	ı				
					and crevices that can be an	treatment has				
					harbourage for bed bugs.	then 100% ef	ficacy	has not	been	
					Assessments (sticky traps) were done	achieved.				
					1 and 90 days after treatment.	This result do				
					Application rate: 50mL Fenox into 5L	the efficacy g				
					water per 100m ²	version 2018	(sectio	n 5.6.4.	6.3.1)	
PT18	Indoor	FENOX	C. lectularius	Field study	PRE-TEST PERIOD :					Guicherd
		(etofenprox			Observations of presence of living		I to other or	I to do a		A. (Nov.
	Crawling	300 g/L)	Mixed	Internal	insects (adults and/or larvae) in		Living adults		Efficacy	2017)
	insects		population	method	mattress or linings or furniture folds for		addits	Пуппрпз		-
					faecal spotting and blood-trails on	D0				Report
	Bed bugs			Control of	sheets, specific counting of insects in	(before 1 st treatment)	96	44	-	17LODCI0
				natural	the bed environment (bedspring,	D7	39	7	67.1%	01
	Surface			infestations	sheets) and the floor.	D14			07.12.70	
	treatment			in a	TEST PERIOD :	(before 2 nd	7	1	94.3%	RI=2
				retirement	2 applications were performed per test	treatment) D21	0	0	100%	
	Residual			home.	site (D0 and D14). Treatment was	D21 D28	0	0	100%	
	efficacy				applied, for the floor, under each	D104	0	0	100%	
	,			5 sites: four	furniture (as bed, sofa, night table and					
					couch) and for walls treatment,					
				apartments	treatment was applied behind the	Diminution of	f livin	a popul	ation was	s
					bedhead and each furniture present in					
				collective	the room. Porous surfaces were					
				living room.						
					bedsprings and hard surfaces for walls					
				The product	and the floors.		atmen		ırthermore	
					The product was not sprayed on					
					mattress, bed linen and pillows.	confirmed 3				
				staff or	materioso, sou initial and pinone.	with 0 living a				
					Observation were made on D-1, D7,	inting a	aaito t	a iai v		
				assessor.	D14, D21, D28 and D104.					
				455555011						
					Application rate: 50mL Fenox into 5L					
					water per 100m ²					
	1		l	1	Mater per 100m					1

Efficacy assessment is based on the data submitted for the first authorisation. No further studies have been submitted for the renewal of the product FENOX, as efficacy guidance Vol II part B/C are not been amended

Submitted efficacy data are compliant with the requirements and criteria of the BPR guidance part B/C (2018) for the following claims:

- Use against crawling insects including cockroaches (e.g. B. germanica, B. orientalis);
- Use against stored-goods attacking insects i.e. adult stage of *T. confusum, S. oryzae, R. dominica, O. surinamensis* and larvae of *L. serricorne;*
- Use against bed bugs (C. lectularius).

Conclusion on the efficacy of the product

The product FENOX has shown a sufficient efficacy against crawling insects including cockroaches, bed bugs and stored-goods attacking insects (i.e. adult stage of T. confusum, S. oryzae, R. dominica, O. surinamensis and larvae of L. serricorne), when applied by spraying at the application rate of $0.5 \, \text{mL}$ Fenox diluted in $50 \, \text{mL}$ water per $1 \, \text{m}^2$ of treated area (porous and non-porous surfaces).

3.2.5.6 Occurrence of resistance and resistance management

As described in the Assessment Report (Sept. 2013), etofenprox is an IRAC⁴ Mode of Action group 3A insecticide. Resistance to etofenprox and other pyrethroids is documented for several groups of insects.

B. germanica belongs to those insect species with the highest numbers of observed resistance cases against pyrethroids worldwide. Resistance cases occurred on all continents under highly diverse climatic conditions. Specifically for *B. germanica*, a resistance mechanism against etofenprox (and other pyrethroids) has been described in the literature⁵. No resistance to etofenprox is reported in the scientific literature for ants.

Regarding ticks, populations of *Rhipicephalus sanguineus* s.l. have been reported to exhibit sodium channel target site insensitivity to permethrin and etofenprox, which is likely due to the prolonged use of pyrethroids against many pests in and around the home⁶.

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⁴ IRAC: Insecticide Resistance Action Committee. http://www.irac-online.org/

⁵ Gliniewicz A, *et al.* [Susceptibility of cockroaches *Blattella germanica* L. collected from hospitals to selected pyrethroid and carbamate insecticides]. Rocz Panstw Zakl Hig. 1996;47(3):333-41. Polish. PMID: 9026900.

⁶ Tucker NSG *et al.* Prevalence and distribution of pathogen infection and permethrin resistance in tropical and temperate populations of *Rhipicephalus sanguineus* s.l. collected worldwide. Med Vet Entomol. 2021 Jun;35(2):147-157. doi: 10.1111/mve.12479.

Resistance is also reported for bed bugs⁷⁸ and mosquitoes belonging to Aedes spp. Anopheles spp. and Culex spp. 91011121314151617.

Resistance against one chemical belonging to a specific group of chemicals is known to confer cross-resistance against other compounds belonging to the same group. The use of etofenprox will therefore have an impact on the resistance development against other pyrethroid insecticides and *vice versa*. If these insecticides are used repeatedly, the resistant individuals may eventually dominate the pest insect population. These resistant insects may not be controlled by etofenprox or by other group 3A insecticides.

To ensure a satisfactory level of efficacy and avoid the development of resistance the recommendations proposed in the SPC have to be implemented.

A monitoring of scientific literature related to the resistance of the target organisms to the active substance etofenprox is requested at the renewal.

The authorization holder should report any observed resistance incidents to the Competent Authorities (CA) or other appointed bodies involved in resistance management.

3.2.5.7 Known limitations

None

3.2.5.8 Evaluation of the label claims

See Efficacy conclusion above.

⁷ Tawatsin A, *et al.* Insecticide resistance in bedbugs in Thailand and laboratory evaluation of insecticides for the control of *Cimex hemipterus* and *Cimex lectularius* (Hemiptera: Cimicidae). J Med Entomol. 2011 Sep;48(5):1023-30. doi: 10.1603/me11003.

⁸ Dang K. et al. Insecticide resistance and resistance mechanisms in bed bugs, Cimex spp. (Hemiptera: Cimicidae). Parasit Vectors. 2017 Jun 29;10(1):318. doi: 10.1186/s13071-017-2232-3.

⁹ Fonseca-González I. et al. Insecticide resistance status of Aedes aegypti (L.) from Colombia. Pest Manag Sci. 2011 Apr;67(4):430-7. doi: 10.1002/ps.2081.

¹⁰ Koou SY. *et al.* Pyrethroid resistance in *Aedes aegypti* larvae (Diptera: Culicidae) from Singapore. J Med Entomol. 2014 Jan;51(1):170-81. doi: 10.1603/me13113.

¹¹ Francis S. *et al*. Screening of insecticide resistance in *Aedes aegypti* populations collected from parishes in Eastern Jamaica. PLoS Negl Trop Dis. 2020 Jul 27:14(7):e0008490. doi: 10.1371/journal.pntd.0008490.

¹² Koffi AA. *et al.* Insecticide resistance status of *Anopheles gambiae* s.s population from M'Bé: a WHOPES-labelled experimental hut station, 10 years after the political crisis in Côte d'Ivoire. Malar J. 2013 May 4;12:151. doi: 10.1186/1475-2875-12-151.

¹³ Menze B.D. et al. Multiple Insecticide Resistance in the Malaria Vector *Anopheles funestus* from Northern Cameroon Is Mediated by Metabolic Resistance alongside Potential Target Site Insensitivity Mutations. PLoS One. 2016 Oct 10;11(10):e0163261. doi: 10.1371/journal.pone.0163261.

¹⁴ Richards S.L. et al. Insecticide Susceptibility Screening against Culex and Aedes (Diptera: Culicidae) Mosquitoes From the United States. J Med Entomol. 2018 Feb 28;55(2):398-407. doi: 10.1093/jme/tjx198.

¹⁵ Ghorbani F. *et al.* High Resistance of Vector of West Nile Virus, *Culex pipiens* Linnaeus (Diptera: Culicidae) to Different Insecticides Recommended by WHO in Northern Iran. J Arthropod Borne Dis. 2018 Mar 18;12(1):24-30. PMID: 30018991.

¹⁶ Richards S.L. *et al.* Baseline Insecticide Susceptibility Screening against Six Active Ingredients for Culex and Aedes (Diptera: Culicidae) Mosquitoes in the United States. J Med Entomol. 2017 May 1;54(3):682-695. doi: 10.1093/jme/tjw231.

¹⁷ Rahimi S. *et al*. Resistant status of *Culex pipiens* complex species to different imagicides in Tehran, Iran. J Vector Borne Dis. 2020 Jan-Mar;57(1):47-51. doi: 10.4103/0972-9062.308800.

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

FENOX is not intended to be used with other biocidal products.

3.2.6 Risk assessment for human health

3.2.6.1 Assessment of effects on Human Health

Skin corrosion and irritation

Su	ımmary tab	le of animal stud	ies on skin corros	ion /irritation	
Method,	Species,	Test	Results	Remarks	Referen
Guideline,	Strain,	substance,	Average score	(e.g. major	ce
GLP status,	Sex,	Vehicle, Dose	(24, 48, 72h)/	deviations)	
Reliability	No/grou	levels,	observations and		
	р	Duration of	time point of		
		exposure	onset,		
			reversibility;		
			other adverse		
			local / systemic		
			effects,		
			histopathological		
			findings		
OECD 404	New	Fenox	Skin reaction	Dryness of	Richeux,
Relibility	Zealand	0.5 ml	appreciated 1	the skin was	2013
1	rabbits	Semi occlusive	hour, 24, 48 and	noted in all	
GLP	3	dressing during	72 hours after	animal on	
		4 hours on an	removal of the	day 7 and	
		undamaged	patch.	totally	
		skin area	Mean score 24-	reversible on	
			48 and72h:	day 14 in 2	
				animals. Still	
			Erythema and	noted on day	
			eschar:	14 in the last	
			Animal 1: 1	one.	
			Animal 2: 1		
			Animal 3: 1		
			reaction was		
			reversible on day		
			7		
			Oedema		
			formation:		
			Animal 1: 0.33		
			Animal 2: 0		
			Animal 3: 0.33		

	reaction was	
	totally reversible	
	on day 3.	

Conclusion used in F	Conclusion used in Risk Assessment – Skin corrosion and irritation						
Value/conclusion	Not classified						
Justification for the value/conclusion	Mean score of reaction and observed effects are compared to CLP regulation criteria.						
Classification of the product according to CLP	Not classified						

Eye irritation

Summary	table of anin	nal studies o	n serious eye damage	and eye irr	itation
Method,	Species,	Test	Results	Remarks	Referen
Guideline,	Strain,	substance	Average score (24,	(e.g.	ce
GLP status,	Sex,	,Dose	48, 72h)/	major	
Reliability	No/group	levels,	observations and	deviations	
		Duration	time point of onset,)	
		of	reversibility		
		exposure			
OECD	New	Fenox	Ocular examinations	The other	Richeux,
guideline	Zealand	0.1 mL in	were performed on	eye	2013
405	rabbits	one eye.	both right and left	remains	
GLP	3		eyes 1 hour, 24, 48	untreated	
Reliability 1			and 72 hours	and	
			following	serves as	
			treatment.	control.	
			Mean score (24, 48 and 72h) Conjunctivae chemosis Animal 1: 0.33 Animal 2: 0.33 Animal 3: 0.33 Conjunctivae redness Animal 1: 0.7 Animal 2: 1 Animal 3: 1 Iris and cornea opacity: 0 for all animals At day 3, all effects are reversible.		

Conclusion used in F	Conclusion used in Risk Assessment – Eye irritation						
Value/conclusion	Not classified						
Justification for the value/conclusion	Mean score of reaction and observed effects are compared to CLP regulation criteria.						
Classification of the product according to CLP	Not classified						

Respiratory tract irritation

Conclusion	n used in the Risk Assessment – Respiratory tract irritation
Justification for the conclusion	No study is provided. Classification is determined according to the rules by calculation of the CLP regulation. None component is classified for this endpoint.
Classification of the product according to CLP	Not classified

Skin sensitization

	Summary table of animal studies on skin sensitisation							
Method, Guideline, GLP status, . Reliability	Species, Strain, Sex, No/group	Test substance, Vehicle, Dose levels, duration of exposure Route of exposure (topical/intradermal, if relevant)	Results (EC3-value or amount of sensitised animals at induction dose); evidence for local or systemic toxicity (time course of onset)	Remarks (e.g. major deviations)	Reference			
OECD guideline 406 Reliability 1 GLP	Guinea pigs 10/group 5/control	Fenox Induction: Intradermic injection = 2% Topical application = 100% 10-day rest Challenge: topical application under occlusive dressing for 24h with test item	No cutaneous reaction attributable to allergy in treated group and no cutaneous intolerance reaction in negative control group	Before the main assay, a preliminar y assay was realized in order to determine the tested	Richeux, 2013			

Summary table of animal studies on skin sensitisation					
	diluted at 20% and		concentra		
	10% in liquid paraffin		tion.		

Conclusion used in F	Conclusion used in Risk Assessment - Skin sensitisation					
Value/conclusion	Not classified					
Justification for the value/conclusion	Reaction and observed effects are compared to CLP regulation criteria.					
Classification of the product according to CLP	Not classified.					

Respiratory sensitization (ADS)

Conclusion used in I	Conclusion used in Risk Assessment – Respiratory sensitisation					
Value/conclusion	Not classified					
Justification for the	No study is provided.					
value/conclusion	Classification is determined according to the rules by calculation of the CLP regulation. None component is classified for this endpoint.					
Classification of the product according to CLP	Not classified					

Acute toxicity

Acute toxicity by oral route

	Summary table of animal studies on acute oral toxicity						
Method Guideline GLP status, Reliability	Species, Strain, Sex, No/group	Test substance Dose levelsType of administra tion (gavage, in diet, other)	Signs of toxicity (nature, onset, duration, severity, reversibility)	Value LD50	Remarks (e.g. major deviations)	Refere nce	
OECD guideline 423 GLP Reliability 1	6 females Sprague Dawley rats	Fenox 2000 mg/kg bw	No mortality No clinical sign Body weight evolution is normal Not change in macroscopical examination	>2000 mg/kg bw		Colas, S., 2009	

Value used in the	/alue used in the Risk Assessment - Acute oral toxicity					
Value	Not classified					
Justification for the selected value	LD 50 value is compared to the value of CLP regulation.					
Classification of the product according to CLP and DSD	Not classified					

Acute toxicity by inhalation

	Summary table of animal studies on acute inhalation toxicity					
Method, Guideline, GLP status , Reliability	Species, Strain, Sex, No/group	Test substance, form (gas, vapour, dust, mist) and particle size (MMAD) Actual and nominal concentration, Type of administration (nose only / whole body/ head only)	Signs of toxicity (nature, onset, duration, severity, reversibility)	LC50	Remarks (e.g. major deviations)	Refer ence
OECD guideline 436 GLP Reliability 1	Three males and three females RccHan: WIST strain rats	Exposure to aerosol atmosphere of fenox by nose only during 4 hours 14 days of observation Mean achieved atmosphere concentration: 5.22 mg/L with with mean MMAD of 2.02 µm and an inhalable fraction (< 4µm) of 79.2%.	No mortality Increase respiratory rate, hunched posture, piloerection and wet fur. Animals recovered to appear normal on day 5 or 6 post- exposure. One animal exhibited dark patches	>5.22 mg/L		Griffit hs, D. R., 2013

target concentration = 5 mg/L)	on the lungs. No macroscopic abnormalitie		
	s were		
	detected		
	amongst the		
	other		
	animals at		
	necropsy		

Value used in th	Value used in the Risk Assessment – Acute inhalation toxicity					
Value	Not classified					
Justification for the selected	Compared to the criteria for classification of CLP regulation					
value						
Classification of the product	Not classified					
according to CLP and DSD						

Acute toxicity by dermal route

	Summary table of animal studies on acute dermal toxicity						
Method,	Species,	Test	Signs of	LD50	Remarks	Refere	
Guideline, GLP status, Reliability	strain, Sex, No/group	substance, Vehicle, Dose levels, Surface area	toxicity (nature, onset, duration, severity, reversibility)		(e.g. major deviations)	nce	
OECD guideline 402 GLP Reliability 1	10 Sprague Dawley rats (5 males and 5 females)	Fenox 2000 mg/kg bw 10% of the body surface area was clear for the application of the test item	No mortality No clinical sign Cutaneous reactions (erythema and dryness) were noted from 24 hours post dose in all females and were totally reversible on day 6.	>200 0 mg/k g bw		Colas, S., 2013	

Body weight evolution is	
normal	
Not change	
in	
macroscopic	
al	
examination	

Value used in the	Value used in the Risk Assessment – Acute dermal toxicity			
Value	Not classified			
Justification for	Compared to the criteria for classification of CLP regulation			
the selected				
value				
Classification of	Not classified			
the product				
according to CLP				
and DSD				

Information on dermal absorption

	Summary tab	le of in vitro	studies on dermal a	bsorption	
Method, Guideline, GLP status, Reliability	Species, Number of skin samples tested per dose, Other relevant information about the study	Test substance, Doses	Absorption data for each compartment and final absorption value	Remarks (e.g. major deviations)	Reference
OECD 428 Reliability 1	Human skin 8 skin samples Analysis of receptor fluid at 0, 0.5, 1, 2, 4, 6, 8, 10, 12 and 24 hours after application. At 8h, dose formulation is removed	Fenox and Fenox diluted at concentratio n in active substance of 3g/L	Fenox: Less than 75 % of the total absorption in receptor fluid occurred within the first 12 hours of the experiment. Therefore, the amount of active substance in stratum corneum is considered as absorbed.	Integrity of the human skin is confirmed by assessing the permeabilit y of tritiated water.	Webbley, K., 2015

from the skin by washing. Following the 24h sampling time-point, system is dismantled and skin is analysed. The remaining Franz cells donor and receptor chambers were washed and the washings retained for analysis of radioactivity

Low recovery for several replicats. Therefore, a normalisation correction is performed.

The absorbed dose was determined considering: the amount of active substance in stratum corneum + skin+ receptor fluid + receptor chamber wash

A significant variation between replicates exists (the relative standard deviation is superior to 25 %). In this context, the standard deviation (10.03%) was added to the mean corrected value (35.51%) to determine the potentially absorbed dose.

Absorbed dose = 46%

Fenox diluted:

Less than 75 % of the total absorption in receptor fluid occurred within the first 12 hours of the experiment.
Therefore, the amount of active substance in stratum corneum is considered as

absorbed.	
Low recovery for several replicats. Therefore, a normalisation correction is performed.	
The absorbed dose was determined considering: the amount of active substance in stratum corneum + skin+ receptor fluid + receptor chamber wash	
A significant variation between replicates exists (the relative standard deviation is superior to 25 %). In this context, the standard deviation (6.91%) was added to the mean corrected value (7.79%) to determine the potentially absorbed dose.	
Absorbed dose = 15%	

Value(s) used in	Value(s) used in the Risk Assessment – Dermal absorption			
Substance	Etofenptox- fenox	Etofenprox- fenox		
	(300 g/l)	diluted (3g/l)		
Value(s)*	46%	15%		
Justification for	EFSA guidance on de	EFSA guidance on dermal absorption 2012*		
the selected				
value(s)				

^{*}The study was assessed during the first authorisation assessment. It was assessed according to the EFSA guidance on dermal absorption of 2012.

In the context of this renewal, it may be reviewed with the EFSA guidance on dermal absorption of 2017. Applying this guidance 2017, dermal absorption values of 44% and 15% are obtained. This difference of absorption will not have an impact on conclusion. Therefore, the initial dermal absorption values of 46% and 15% are maintained to determine exposure. This approach is in line with the approach proposed for product using a dermal absorption study assessed during the assessment of an active substance (see note of the coordination group for biocides: dermal absorption value for the authorisation of biocidal products).

It should be noted that the dermal absorption of etofenprox is higher for the concentrated formulation, than for the diluted one. This can be explained by the presence of solvent in the concentrate (which can enhance absorption) contrary to the dilution which is constituted mainly of water.

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

No SOC is identified.

Available toxicological data relating to a mixture

Not available

Other

Based on the classification of the active substance and the experimental studies provided for the product, the product FENOX is classified H362: May cause harm to breast-fed children.

Remark: Even if etofenprox is a pyrethroid, the paresthesia is not reported in the CAR. However, in the first aid instruction, for skin exposure it is mentioned: "If symptoms occur call a POISON CENTRE or a doctor." Proposing this instruction, no self-diagnosis of paresthesia will occur and a medical specialist could suspect a paraesthesia after the description of the symptoms by the users and the precision of the active substance if it occurs.

3.2.6.2 Exposure assessment

The product FENOX is used by professional and non-professional.

It is intended to be applied by spraying on surface.

Secondary exposure can occur for general public during contact with treated surface.

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

Summary table: relevant paths of human exposure							
Primary (direct) exposure Secondary (indirect) exp				exposur	е		
Exposure path	Industri al use	Profession al use	Non- profession al use	Industri al use	Profession al use	Gener al public	Via food
Inhalation	Not relevant	Yes	Yes	Not relevant	No	Yes	

	Summary table: relevant paths of human exposure						
Dermal	Not relevant	Yes	Yes	Not relevant	No	Yes	
Oral	Not relevant	No	No	Not relevant	No	Yes	No

List of scenarios

		Summary table: scenarios	
Scenari o number	Scenario (e.g. mixing/ loading)	Primary or secondary exposure Description of scenario	Exposed group (e.g. professionals, non- professionals, bystanders)
1.	Spraying	Primary exposure Exposure occurs during different tasks: mixing and loading, application and cleaning of spray equipment.	Professional
2.	Spraying	Primary exposure	Non- professional
3	Volatilisation of residue	Secondary exposure	General public
4	Infant crawling on treated surface	Secondary exposure Dermal exposure and oral exposure via a hand to mouth transfer Exposure is determined for contact with wet and dry surface	General public
5	Adult who touchs a treated surface	Secondary exposure Dermal exposure Exposure is determined for contact with wet and dry surface	General public
6	Adult, child and infant who sleep in a bed treated against bed bugs	Secondary exposure	General public

Industrial exposure

Not relevant

Professional exposure

Scenario [1]

Description of Scenario [1]

Considering the restrictions of application: "The product has to be applied only on restricted areas on surfaces not regularly cleaned, for example: behind or under the fridge, under the kitchen sink, under the oven or the water heater", it is therefore assumed that professional users will spray the product essentially in a downward direction.

As stated in the recommendation no. 3 of the BPC Ad hoc working group, the use of spraying model 1 model will overestimate the exposure of this type of application. A refined approach is therefore proposed to assess exposure of professional users.

Description of Scenario [1]

The exposure during mixing and loading phase was assessed using the M&L model 4 (task 1). The exposure during spraying phase is assessed using RISKOFDERM and ART models as recommended by the BPC Ad hoc working group (recommendation no. 3) (task 2). Finally, the exposure during cleaning phase was assessed using BEAT scenario "Cleaning of the spray equipment" (task 3).

Parameters ¹	Value	Source
1 di dillictors	Value	Source

Task 1: Mixing and loading

The product is diluted at the rate of 50 mL of concentrate in 5 L of water.

The maximum pack size containing FENOX product is 1 L and professional users can be exposed to the concentrate product when loading it in a dosing vessel.

According to HEEG Opinion 1, the recommended choice for assess mixing and loading of small quantities is the model 4. This model is described in ECHA guidance: Biocides Human Health Exposure Methodology (BHHEM) p 193.

Common	Concentration in active substance	300g/l	Applicant data
parameters	Density	1.031	Applicant data
	Hand exposure	0.01 mL	Mixing and loading model 4 (BHHEM)
	Dermal absorption	46%	See above
	Body weight	60 kg	Recommendation 14 of the ad hoc WG on human exposure
Tier 1 (no PPE)	Penetration factor	100%	Default value
Tier 2 (gloves)	Penetration factor	10%	HEEG opinion 9

Task 2: Spraying on downward position with a low pressure sprayer

According to the recommendation no.3 of the BPC Ad hoc Working Group on Human exposure, the combination of RISKOFDERM and ART models is considered as the appropriate approach for downward spraying at low pressure.

According to this recommendation the application rate of 0.3 to 3L/min is a reasonable worst case for the assessment of exposure.

This value is used with ART model to assess inhalation exposure.

However, for dermal exposure with RISKOFDERM model, the lower value of this range i.e. 0.3L/min is used.

Considering the dose per square metre (5L of diluted product to treat 100m²), this value is more realistic than 3L/min and represents a treatment of approximately 100 m² in 15 minutes.

Common	Concentration in active substance	0.3%	Applicant data
parameters	Dermal absorption	15%	See above
	Body weight	60 kg	Recommendation 14 of
	Inhalation rate	1.25 m ³ /h	the ad hoc WG on
			human exposure

Description of	Scenario [1]		
	Potential hand exposure Potential body exposure	24.2 μl/min 81 μl/min	RISKOFDERM model for 75th percentile as recommended in recommendation 3 of the ad hoc WG on human exposure
	Inhalation exposure	0.076 mg a.i./m ³	ART model using the upper bound of the interquartile of 75th percentile as recommended in recommendation 3 of the ad hoc WG on human exposure
	Exposure duration	120 minutes	ВННЕМ
Tier 2 gloves	Penetration factor for gloves	10%	HEEG opinion 9
and coated coverall	Penetration factor for coated coverall	20%	HEEG opinion 9
	Penetration factor for gloves	10%	HEEG opinion 9
Tier 3 gloves and impermeable	Penetration factor for impermeable coverall	5%	HEEG opinion 9
coverall and mask APF 4	Protection factor for mask APF 4	4	ВННЕМ

After application, professionals can be exposed to product during the cleaning of spray equipment. Exposure during the cleaning of equipment is assessed with the BEAT scenario "Cleaning of the spray equipment".

	<u>-p.a/ -qa.p</u>		
Common	Concentration in active substance	0.3%	Applicant data
parameters	Dermal absorption	15%	See above
	Body weight	60 kg	Recommendation 14 of the ad hoc WG on human exposure
	Body exposure	19.28 mg/min	BEAT model
	Hand exposure	35.87 mg/min	BEAT model
	Duration of exposure	10 min	ВННЕМ
Tier 2 gloves	Penetration factor for gloves	10%	HEEG opinion 9
and coated coverall	Penetration factor for coated coverall	20%	HEEG opinion 9
	Penetration factor for gloves	10%	HEEG opinion 9

Description of Scenario [1]					
Tier 3 gloves and impermeable coverall	Penetration factor for impermeable coverall	5%	HEEG opinion 9		

Calculations for Scenario [1]

	Summary table: estimated exposure from professional uses					
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake	
Task 1	No PPE	Not relevant	2.37E-02	Not relevant	2.37E-02	
	Gloves	Not relevant	2.37E-03	Not relevant	2.37E-03	
Task 2	No PPE	3.16E-03	9.47E-02	Not relevant	9.78E-02	
	Gloves coated coverall	3.16E-03	1.68E-02	Not relevant	1.99E-02	
	Gloves imperme able coverall and mask APF 4	7.90E-04	5.82E-03	Not relevant	6.61E-03	
Task 3	No PPE	Not relevant	4.14E-03	Not relevant	4.14E-03	
	Gloves coated coverall	Not relevant	5.58E-04	Not relevant	5.58E-04	
	Gloves imperme able coverall	Not relevant	3.41E-04	Not relevant	3.41E-04	

Non-professional exposure

Scenario [2]

Description of Scenario [2]

Considering the intended uses (not limited to crack and crevice, exposure during spraying is assessed using the Consumer Spraying and Dusting Model 3.

As the product is sold in individual sachet, exposure during loading step is negligible.

Parameters ¹	Value	
Hands/forearms exposure	176 mg product/minute	ВННЕМ
Legs feet face exposure	120 mg product/minute	ВННЕМ
Inhalation	115 mg product/m ³	ВННЕМ
Duration of exposure	10 minutes	Consexpo pest control factsheet.
Dermal absorption	15%	See above
Inhalation absorption	100%	Default value
Concentration of active substance	0.3%	Applicant data
Body weight	60 kg	Recommendation 14 of the ad hoc WG on human exposure

Calculations for Scenario [2]

Summary table: systemic exposure from non-professional uses					
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake
Scenario [2]	No PPE	1.21E-03	2.24E-02	Not relevant	2.36E-02

Exposure of the general public

Four scenarios of exposure is assessed:

- Exposure to volatile residue
- Exposure of an infant who crawls on treated surface with a hand to mouth transfer (wet and dry surface)
- Exposure to an adult who touchs a treated surface with its hands (wet and dry surface)
 - Exposure of adult, child and infant who sleep in a bed treated against bed bugs.

These scenarios are relevant for professional and non-professional treatment.

Scenario [3]

Description of Scenario [3]

Exposure to volatile residue is determined according to the HEEG opinion 13 "Assessment of inhalation exposure of volatilised biocides active substance".

	Parameters ¹	Value	Source
Tier 1	Vapor pressure	8.13E-07 Pa	CAR
	Molecular weight	376.47 g/mol	CAR
	Adult body weight	60 kg	Recommendation 14 of the ad hoc
			WG on human exposure
	Child body weight	23.9 kg	
	Toddler body weight	10 kg	

Calculations for Scenario [3]

Exposure scenario	Estimated total uptake Mg/kg/d
Adult	3.35E-05
Child	6.31E-05
Toddler	6.79E-05

Scenario [4]

Description of Scenario [4]

Exposure is determined for infant crawling on treated surface. Exposure via hand to mouth contact is also determined.

This exposure is estimated based on the approach proposed in Consexpo fact sheet "Cleaning products". ConsExpo software is not used for the calculation.

Dermal exposure of infants can take place on any uncovered skin, that is the head, the arms and hands, and on the legs and feet. According to the Recommendation 12 of the ad hoc WG on human exposure, a transfer coefficient of 0.2 m2/h and 1h of exposure are used.

Oral exposure is determined considering that the hands form about 20 % of the total uncovered skin. It is assumed that 50 % of the product that ends up on the hands is taken in orally (ConsExpo: Pest control Fact Sheet). This means that via hand-mouth contact 10 % of the calculated external dermal exposure is ingested and that the internal dermal exposure is 90 % of the calculated external dermal exposure.

	Parameters ¹	Value	Source
Common	Application rate	0.15 g as/m2	Applicant data
parameters	Dermal absorption	15%	See above
	Oral absorption	30%	CAR
	Body weight	8 kg	Recommendation 14 of the ad
			hoc WG on human exposure

Description of S	Scenario [4]		
Tier 1 wet	Fraction of active	100%	Default value
surface	substance dislodgeable		
Tier 1 dried		30%	ВННЕМ
surface			
Tier 2 dried		11%	Study of CAR
surface after 4			
hours for carpet			
Tier 2 dried		4%	Study of CAR
surface after 7			, i
days for carpet			

Calculations for Scenario [4]

	Summary table: systemic exposure from non-professional uses						
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake		
Infant	Tier 1	Not relevant	5.06E-01	1.13E-01	6.19E-01		
crawling	Tier 2 (30%)	Not relevant	1.52E-01	3.38E-02	1.86E-01		
	Tier 2 - 4h (11%)	Not relevant	5.57E-02	1.24E-02	6.81E-02		
	Tier 2 – 7 days (4%)	Not relevant	2.03E-02	4.50E-03	2.48E-02		

Scenario [5]

Description of Scenario [5]								
An adult can be both hands).	An adult can be exposed touching a treated surface (wet and dried) with its hands (palm of both hands).							
	Parameters ¹ Value Source							
	Application rate 0.15 g as/m2 Applicant data							
	Dermal absorption	15%	See above					
	Body weight	60 kg	Recommendation 14 of the ad hoc WG on human exposure					
	Fraction of active substance dislodgeable from wet surface	100%	Default value					
	Fraction of active substance dislodgeable from dried surface	30%	ВННЕМ					

Description of Scenario [5]					
	Hands area		Recommendation 14 of the ad hoc WG on human exposure		

Calculations for Scenario [5]

	Summary table: systemic exposure from non-professional uses							
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake	Estimated oral uptake	Estimated total uptake			
Scenario [5]	Wet surface	Not relevant	1.54E-02	Not relevant	1.54E-02			
Scenario [5]	Dried surface	Not relevant	3.69E-03	Not relevant	4.61E-03			

Scenario [6]

Description of Scenario [6]

Adult, child and infant could be exposed during sleeping in a treated bed.

In order to determine the exposure, it is considered that they sleep without cloth and all the surface body can be exposed. The surface body used were determined according to the recommendation 14 of the ad hoc WG.

The body will not be in direct contact with bed, as there is sheet. In this context, a protection factor of 50 % is considered (Ad hoc Working group on Human Exposure Recommendation 8).

	Parameters ¹	Value	Source
Tier 1	Application rate	0.15 g as/m2	Applicant data
	Dermal absorption	15%	See above
	Body weight	60 kg (adult)	Recommendation 14 of
		23.9 g (child)	the ad hoc WG on human
		8 kg (infant)	exposure
	Fraction of active substance dislodgeable from dried surface	30%	ВННЕМ
	Body area in contact	16600 cm2 (adult)	
		9200 cm2 (child)	Recommendation 14 of
		4100 cm2 (infant)	the ad hoc WG on human
			exposure

Calculations for Scenario [6]

	Summary table: systemic exposure from non-professional uses						
Exposure scenario	Tier/PPE	Estimated inhalation uptake	Estimated dermal uptake mg/kg/d	Estimated oral uptake	Estimated total uptake mg/kg/d		
Scenario	Adult	Not relevant	9.34E-02	Not relevant	9.34E-02		
[6] dried	Child	Not relevant	1.30E-01	Not relevant	1.30E-01		
	Infant	Not relevant	1.73E-01	Not relevant	1.73E-01		

Dietary exposure

No specific residue data was submitted in the framework of this dossier. The intended indoor uses in industrial, commercial, public premises and private homes via surface spraying are not expected to lead to contamination of food, feed or livestock considering the following precautionary statements:

- Remove all food, feed and drinks prior to treatment.
- Do not apply directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and livestock.
- To avoid indirect contamination during nearby application, cover all surfaces and facilities likely to be in contact with food, feed, drinks and animals.

<u>Information of non-biocidal use of the active substance</u>

Sumn	Summary table of other (non-biocidal) uses					
	Sector of use ¹	Intended use	Reference value(s) ²			
1.	Plant protection products (1)	Insecticide used in agriculture on several crops against sucking and biting insects	MRL from 0.01* mg/kg to 4 mg/kg listed in Reg. (EU) 2021/590 ADI = 0.03 mg/kg bw/day			
			ADI = 0.03 mg/kg ARfD = 1 mg/kg			

¹ Reg. (EU) No 540/2011

Estimating Livestock Exposure to Active Substances used in Biocidal Products

Not relevant.

3.2.6.3 Risk characterisation for human health

Reference values to be used in Risk Characterisation

Reference	Study	NOAEL	AF ¹	Correction for oral	Value
		(LOAEL)		absorption	

AELshort-term	Rat development al neurotoxicity feeding study	28.4 mg/kg bw/d	100	30% oral absorption	0.085
AELmedium- term	Rat subchronic feeding study	20 mg/kd bw/d	100	30% oral absorption	0.06
AELlong-term	Rat 2-year feeding study	3.7 mg/kg bw/d	100	30% oral absorption	0.011
ARfD			Not det	ermined	
ADI					

Maximum residue limits or equivalent

No specific biocide MRLs are established for this active substance. Nevertheless, MRLs related to PPP uses are established under Regulation (EC) 396/2005 (See paragraph above "Information of non-biocidal use of the active substance").

Risk for industrial users

Not relevant

Risk for professional users

Professional exposure is compared to the chronic term AEL of 1.1E-02 mg/kg/d.

Systemic effects

Task/ Scenario	Tier	AEL mg/kg bw/d	Estimated uptake mg/kg bw/d	Estimated uptake/ AEL (%)	Accep table (yes/ no)
Scenario 1-	No PPE	1.1E-02	2.37E-02	216%	No
task 1	Gloves	1.1E-02	2.37E-03	22%	Yes
Scenario 1-	No PPE	1.1E-02	9.78E-02	889%	No
task 2	Gloves coated coverall	1.1E-02	1.99E-02	181%	No
	Gloves imperme able coverall and	1.1E-02	6.61E-03	60%	Yes

	mask APF 4				
Scenario 1- task 3	No PPE	1.1E-02	4.14E-03	38%	yes
	Gloves coated coverall	1.1E-02	5.58E-04	5%	yes
	Gloves imperme able coverall	1.1E-02	3.41E-04	3%	yes

Combined scenarios

Scenarios combined	Tier	AEL mg/kg bw/d	Estimated uptake mg/kg bw/d	Estimated uptake/ AEL (%)	Acceptable (yes/no)
[task 1 + 2 + 3]	no PPE	1.1E-02	1.26E-01	1143	NO
[task 1 + 2 + 3]	M&L: gloves Spraying and cleaning: Gloves coated coverall	1.1E-02	2.28E-02	208	NO
[task 1 + 2 + 3]	M&L: gloves Spraying: Gloves impermeable coverall and mask APF4 Cleaning: Gloves and coated coverall	1.1E-02	9.54E-03	87	YES

The risk is acceptable when:

- Gloves are worn during mixing and loading;
- Gloves, impermeable coverall and mask APF 4 are worn during spraying;
- Gloves and coated coverall are worn during the cleaning of spray equipment.

Risk for non-professional users

Non-professional exposure is compared to the acute term AEL of 8.5E-02 mg/kg/d.

Systemic effects

Task/	Tier	AEL	Estimated	Estimated	Acceptable
Scenario		mg/kg	uptake	uptake/	(yes/no)
		bw/d	mg/kg	AEL	
			bw/d	(%)	

Scenario 2	1	8.5E-02	2.36E-02	28%	Yes

The estimated exposure during spraying is inferior to AEL. Therefore, the risk is considered acceptable for non-professional.

Remark: The exposure during the cleaning of spray equipment was not determined. However, it is considered that it will not be superior to exposure during application. If the exposure during application is multiplied by 2, the exposure is always inferior to 100% (56%). Therefore, no specific RMM is needed for rinsing step.

Risk for the general public

The exposure to wet surface is compared to the acute AEL of 8.5E-02 mg/kg/d.

A delayed effect until 12 weeks is desired. In this context, the secondary exposures (exposure to volatile residue and contact with dried surface) are compared to the subchronic AEL of 6E-02 mg/kg/d.

For refinement with carpet data, the 4 hours dislodgeable fraction is used to refine acute exposure and the 7 days dislodgeable fraction is use to refine subchronic exposure.

Systemic effects

Task/ Scenario	Tier	AEL mg/kg	Estimat ed	Estimated uptake/	Acceptable (yes/no)
Scenario		bw/d	uptake mg/kg bw/d	AEL (%)	(469/110)
Scenario 3	Adult	6E-02	3.35E- 05	0.06%	Yes
	Child	6E-02	6.31E- 05	0.11%	Yes
	Toddler	6E-02	6.79E- 05	0.11%	Yes
Scenario 4	Tier 1	8.5E- 02	6.19E- 01	728%	No
	Tier 2 (30%)	6E-02	1.86E- 01	309%	No
	Tier 2 - 4h (11%)	8.5E- 02	6.81E- 02	80%	Yes
	Tier 2 – 7 days (4%)	6E-02	2.48E- 02	41%	Yes
Scenario 5	Wet surface	8.5E- 02	1.54E- 02	18%	Yes
	Dried surface	6E-02	4.61E- 03	8%	Yes
Scenario 6 dried	Adult	6E-02	9.34E- 02	156%	No

Child	6E-02	1.30E- 01	217%	No
Infant	6E-02	1.73E- 01	288%	No

Estimated exposure to volatile residues is inferior to AEL.

Estimated secondary exposures of infant crawling in treated surface are superior to AEL for all scenarios, except for exposure of an infant crawling on a carpet after spraying.

However, carpet is not representative of all treated surface, therefore mitigation measures are proposed:

The product should not be applied in zone accessible to children. If it is applied on rooms accessible to children, the following mitigation measure is proposed: children should not access treated areas until all necessary treatments and cleaning have been finalised".

Estimated secondary exposures of an adult touching a treated surface are inferior to AELs.

Estimated secondary exposures of persons (adult, child and infant) sleeping in a treated bed are superior to AELs. Therefore, the risk is considered unacceptable and a mitigation measure is proposed:

For bedding, the application should be restricted to the bed frame and box spring. Do not treat the mattress, bed linen and pillows. The mattress, bed linen and pillows must be treated by other methods.

Combined scenarios

- For professional:

The combined exposures (exposure during application, exposure to volatile residue and exposure during touching a wet treated surface at home) are determined and compared to the acute AEL of 8.5E-02 mg/kg/d as it is an occasional scenario (as his home will be treated only 2 times per year). This scenario is very conservative.

Scenarios combined	AEL mg/kg bw/d	Estimated uptake mg/kg bw/d	Estimated uptake/ AEL (%)	Acceptab le (yes/no)
Professional: exposure during Spraying + exposure to volatile residue + exposure by contact with wet treated surface	8.5E-02	2.50E-02	29%	Yes

Estimated exposure is inferior to AEL for the combined scenario: exposure during Spraying + exposure to volatile residue + exposure during touching wet treated surface. Therefore, the risk is considered acceptable.

- For non-professional:

A delayed effect until 12 weeks is desired; however a non-professional applies the product by spraying occasionally. In this context, the combined exposures (exposure during application, exposure to volatile residue and exposure during touching a treated surface) are compared to the acute AEL of 8.5E-02 mg/kg/d.

Scenarios combined	AEL mg/kg bw/d	Estimated uptake mg/kg bw/d	Estimated uptake/ AEL (%)	Acceptab le (yes/no)
Non-professional: exposure during Spraying + exposure to volatile residue + exposure by contact with wet treated surface	8.5E-02	3.9E-02	46%	Yes

Remark: even with a cleaning step of the equipment is considered (please see above), the exposure will be inferior to AEL.

Estimated exposure is inferior to AEL for the combined scenario: exposure during Spraying + exposure to volatile residue + exposure during touching wet treated surface. Therefore, the risk is considered acceptable.

As individual risk is ever unacceptable for infant crawling on treated area and sleeping in treated bed, no combined exposure for secondary exposure is determined.

Risk for consumers via residues in food

Based on the proposed measures, the intended indoor uses (industrial, commercial, public premises and private home) are unlikely to cause a dietary risk to consumers. The product FENOX will not get into contact with food, feed and livestock and will not leave residues in commodities for human or animal consumption. Regarding consumer health protection, there are no objections against the intended uses. The following precautionary statement should be indicated on the labels:

- Remove all food, feed and drinks prior to treatment.
- Do not apply directly on or near food, feed or drinks, or on surfaces or utensils likely to be in direct contact with food, feed, drinks and livestock.
- To avoid indirect contamination during nearby application, cover all surfaces and facilities likely to be in contact with food, feed, drinks and animals.

Risk characterisation from combined exposure to several active substances or substances of concern within a biocidal product

[Please, refer to Guidance for Human Health Risk Assessement, Volume III, Part B - to characterise the risk in case of exposure to several active substances or substances of concern within a product]

3.2.7 Risk assessment for animal health

No guidance is available to assess the risk for animals. In this context, it is covered by the risk assessment performed for humans. The following RMM has to be added:

The product should not be applied in zone accessible to children and pets.

3.2.8 Risk assessment for the environment

3.2.8.1 Effects assessment on the environment

An overview for the PNECs for the active substance Etofenprox and its relevant metabolites are given in the tables below. All the values were agreed at the approval of the active substance except for the PNEC soil which was refined at WGIV2016:

Compartment	PNEC (Etofenprox)	PNEC (a-CO)	PNEC (4'-OH)
STP microorganisms	2.25E-02 mg/L	n.r.	n.r.
Surface water	5.40E-06 mg/L	4.40E-05 mg/L (CAR)	n.r.
Sediment (EPM)	6.30E-03 mg/kg wwt (study)	n.r.	1.20E-02 mg/kg _{wwt} (EPM)
Soil	6.33E-03 mg/kg wwt (agreed at WGIV2016)	n.r.	n.r.
Birds	33.3 mg/kg food	n.r.	n.r.
Mammals	24.7 mg/kg food	n.r.	n.r.

With regard to the formation of metabolites in aquatic systems, two major metabolites – α –CO and 4'-OH– were detected in the CAR at significant concentrations (i.e. >10 %) in the water-sediment degradation study. Maximum formation of α -CO reached 63.5% in water and did not exceed 21.4% for the 4'OH in sediment.

Information relating to the ecotoxicity of the biocidal product which is sufficient to enable a decision to be made concerning the classification of the product is required

Classification of the Active Substance Etofenprox				
Value/conclusion	Very toxic to aquatic life- H400 with M-factor= 100 Very toxic to aquatic life with long-lasting effects - H410 with M-factor = 1000			

Classification and labelling of the Product FENOX		
Value/conclusion	Aquatic Chronic 1; H410	
Value/conclusion	Aquatic Acute 1 ; H400	

Further Ecotoxicological studies

No new data is available.

Effects on any other specific, non-target organisms (flora and fauna) believed to be at risk (ADS)

No new data is available.

Supervised trials to assess risks to non-target organisms under field conditions

No new data is available.

Studies on acceptance by ingestion of the biocidal product by any non-target organisms thought to be at risk

No new data is available.

Secondary ecological effect e.g. when a large proportion of a specific habitat type is treated (ADS)

No new data is available.

Foreseeable routes of entry into the environment on the basis of the use envisaged

The product is intended to be used indoor. Therefore, the active substance can reach the STP after wet cleaning of the treated surfaces. The active substance is then distributed at a local scale to surface water, sediment, agricultural soil and groundwater.

Further studies on fate and behaviour in the environment (ADS)

No new data is available.

Leaching behaviour (ADS)

No new data is available.

Testing for distribution and dissipation in soil (ADS)

No new data is available.

Testing for distribution and dissipation in water and sediment (ADS)

No new data is available.

Testing for distribution and dissipation in air (ADS)

No new data is available.

If the biocidal product is to be sprayed near to surface waters then an overspray study may be required to assess risks to aquatic organisms or plants under field conditions (ADS)

The biocidal product is applied indoor and is not intended to be sprayed near to surface waters. Therefore a risk assessment for spray application is not relevant.

If the biocidal product is to be sprayed outside or if potential for large scale formation of dust is given then data on overspray behaviour may be required to assess risks to bees and non-target arthropods under field conditions (ADS)

The biocidal product is used indoor. Therefore a risk assessment for spray application is not relevant.

3.2.8.2 Exposure assessment

General information

Assessed PT	PT 18
Assessed scenarios	Scenario 1: Indoor, spray application
ESD(s) used	Emission Scenario Document for Product Type 18: Emission Scenario Document for Insecticides, acaricides and products
	to control other arthropods for household and professional uses, July 2008.
Approach	Scenario 1: Average consumption
Distribution in the	Calculated based on ESD model, EUSES 2.1 and Simple Treat
environment	4.0
Groundwater simulation	No
Confidential Annexes	No
	Scenario 1:
	Production: No
Life cycle steps assessed	Formulation No
	Use: Yes
	Service life: Yes
Remarks	No

Emission estimation

For the first authorisation, the product has been authorized for a use in domestic areas and large buildings at the application rate of 0.5 mL pure product/m² when the treated area was restricted to a medium scale surface (corresponding to the area of a barrier treatment) for only two applications per year. The use instructions were the following:

The product has to be applied only on restricted areas on surfaces not regularly cleaned, for example:

- behind or under the fridge, under the kitchen sink, under the oven or the water heater, in all cracks and crevices that can be an harbourage for cockroaches.
- on the bedspring, on the feet of the bed, under furnitures, along plinths, behind headboard, on the wall behind the bed, furnitures and all crack and crevices that can be harbourage for bed bugs.

These use instructions justify the use of the barrier scenario. Even if the use instructions mention that "the product has to be applied only on restricted areas on surfaces not regularly cleaned", the exposure assessment is based on wet cleaning of the treated surfaces.

For containers with unspecified design, the emission factors towards floor during the preparation step are summarized in the ESD PT18 (table 3.2-3). According to the packaging claimed by the applicant, the value of 1.0E-04 for fraction emitted to floor ($F_{prep,floor}$) during professional uses is used. According to the packaging for non-professional users, the releases towards the environment are negligible as water soluble sachet are assumed to be mixed with water directly in the sprayer preventing spillages to applicator or floor.

Scenario [1] - Indoor, spray application

According to the CG-59 discussions (28/11/2023), the simultaneity factor of 0.00204 corresponding to a maximal use frequency of 2 times/year can be applied for professional use only. The simultaneity factor of 0.00815 corresponding to a use frequency of 3-11 times/year will be applied for non-professional use, as it can be expected that non-professional users would use the product at a higher use frequency in realistic conditions due to the wide variety of target organisms.

Scenario 1 is proposed for either professionals with a simultaneity factor of 0.00204 (corresponding to 2 applications/year max.) or non-professionals with a simultaneity factor of 0.00815 (corresponding to 11 applications/year max.) and a use in houses only.

Input parameters for calculating the local emission - Professional users						
Input	Value	Unit	Remarks			
Scenario 1 – Indoor, spray application. Barrier treatment.						
Application rate of pure biocidal product	0.5	mL.m ⁻²				
Fraction of active substance (Etofenprox)	2.934E-01	-	technical			
Density of the product	1.031	kg.L ⁻¹				
Treatment rate of etofenprox	1.51E-01	g _{as} .m ⁻²				

	Т	1	
Area treated (private house)	20	m²	Barrier treatment for a domestic house – TAB
Area wet cleaned (private house)	5.9	m²	ENV 204 (02/2021)
Area treated (building)	93	m²	Barrier treatment for a building – TAB ENV
Area wet cleaned (building)	27	m ²	204 (02/2021)
Mixing/Loading			
Volume of pure product for preparation (house)	10	mL	0.5 mL x 20
Volume of pure product for preparation (building)	46.5	mL	0.5 mL x 93
Fraction emitted to air	0	-	D
Fraction emitted to applicator	1.20E-03	_	D
Fraction emitted to floor	1.00E-04	-	D for 1L containers with unspecific design used by professionals.
Emission to air	0	kg.d ⁻¹	0
Emission to applicator			0
-house	3.63E-06	kg.d ⁻¹	
-building	1.69E-05		
Emission to floor			0
-house	3.20E-07	kg.d ⁻¹	
-building	1.412E-06		
Application	1	T	1
Number of applications per day	1	-	
Fraction emitted to air	0.020	-	
Fraction emitted to applicator	0.020	-	
Fraction emitted to floor:	0.960	-	Table 3.3-5 ESD PT18
-Emission factor to the floor during the insecticide surface treatment by spraying	0.11		
-Emission factor to the treated surface during a surface treatment by spraying	0.85		
Emission to air			
-house	6.05E-05	kg.d ⁻¹	
-building	2.81E-04		
Emission to applicator			
-house	6.05E-05	kg.d ⁻¹	

-building	2.81E-04		
Emission to floor and treated surface during application (from the wet cleaned area before cleaning)		kg.d ⁻¹	
-house	8.57E-04		
-building	3.92E-03		
Cleaning	•		
Cleaning efficiency for surfaces	0.5	-	D - surface
Cleaning efficiency for applicator	1	-	D
Emission to applicator (preparation+application) -house	6.41E-05	kg.d ⁻¹	0
-building	2.98E-04		
Emission to floor and treated surfaces (preparation + application) -house -building	4.28E-04 1.96E-03	kg.d ⁻¹	0
Number of houses Number of large buildings	4000 300		0
Simultaneity factor	0.204	%	D - 2 applications per year

Input parameters for calculating the local emission – Non-professional users						
Input	Value	Unit	Remarks			
Scenario 1 – Indoor, spray application. Barrier treatment.						
Application rate of pure biocidal product	0.5	mL.m ⁻²				
Fraction of active substance (Etofenprox)	2.934E-01	-	technical			
Density of the product	1.031	kg.L ⁻¹				
Treatment rate of etofenprox	1.51E-01	g _{as} .m ⁻²				
Area treated (private house)	20	m ²	Barrier treatment for a domestic house – TAB			
Area wet cleaned (private house)	5.9	m ²	ENV 204 (02/2021)			
Mixing/Loading						
Volume of pure product for preparation (house)	10	mL	0.5 mL x 20			
Fraction emitted to air	0	-	D			

	<u> </u>	1	T
Fraction emitted to applicator	1.20E-03	-	D
Fraction emitted to floor	1.00E-04	-	D for 1L containers with unspecific design used by professionals.
Emission to air	0	kg.d ⁻¹	0
Emission to applicator			0
-house	3.63E-06	kg.d ⁻¹	
Emission to floor			0
-house	3.20E-07	kg.d ⁻¹	
Application		1	
Number of applications per day	1	-	
Fraction emitted to air	0.020	-	
Fraction emitted to applicator	0.020	-	
Fraction emitted to floor:	0.960	-	Table 3.3-5 ESD PT18
-Emission factor to the floor during the insecticide surface treatment by spraying	0.11		
-Emission factor to the treated surface during a surface treatment by spraying	0.85		
Emission to air -house	6.05E-05	kg.d ⁻¹	
Emission to applicator -house	6.05E-05	kg.d ⁻¹	
Emission to floor and treated surface during application (from the wet cleaned area before cleaning)		kg.d ⁻¹	
-house	8.57E-04		
Cleaning	1	1	
Cleaning efficiency for surfaces	0.5	-	D - surface
Cleaning efficiency for applicator	1	-	D
Emission to applicator (preparation+application)		kg.d ⁻¹	0
-house	6.41E-05		

Emission to floor and treated surfaces (preparation + application) -house	4.28E-04	kg.d ⁻¹	0
Number of houses	4000		0
Simultaneity factor	0.815	%	D - 11 applications per year

Calculations for Scenario [1]

Resulting local emission to relevant environmental compartments				
Compartment Local emission (Elocal _{compartment}) [kg/d] Remarks				
STP - PRO (houses+buildings)	5.40E-03	2 applications/year max.		
- NON-PRO (houses)	1.61E-02	11 applications/year max.		

Fate and distribution in exposed environmental compartments

Identification of relevant receiving compartments based on the exposure pathway						
Freshwater					Groundwater	
Scenario 1	Yes	Yes	Yes	n.r.	Yes	Yes

Input parameters (only set values) for calculating the fate and distribution in the environment						
Input	Value	Unit	Remarks			
Etofenprox						
Molecular weight	376.47	g.mol ⁻¹				
Water solubility (at 20°C)	0.0225	mg.L ⁻¹				
Log Octanol/water partition coefficient	6.9	Log 10				
Organic carbon/water partition coefficient (Koc)	28 524	L.kg ⁻¹				
Henry's Law Constant (at 25°C)	0.0136	Pa/m3/mol				
Biodegradability	Not readily biodegradable					
DT ₅₀ for degradation in soil	22.8	d (at 12°C)				
BCF fish	2565	L.kg ⁻¹				
BCF earthworm	95281	L.kg ⁻¹				
BMF	2	-				
αCO	_					

Molecular weight	299	g.mol ⁻¹
Maximum formation fraction in water	0.635	-
4'-OH		
Molecular weight	393	g.mol ⁻¹
Maximum formation fraction in sediment	0.214	-

For the assessment the molar weight of each metabolite was also considered and the PEC calculated as follows:

PEC metabolite = PEC parent x formation fraction x (molar weight metabolite / molar weight parent)

Calculated fate and distribution in the STP			
Compartment	Percentage [%]	Remarks	
Compartment	Scenario 1		
Air	0%		
Water	1.5%	Agreed at WGIV	
Sludge	92.8%	2016 (post	
Degraded in STP	5.9%	approval)	

Calculated PEC values

Summary table on calculated PEC values - PRO							
	PEC _{STP} PEC _{water} PEC _{sed} PEC _{soil} PEC _{GW}						
	[mg/L]	[mg/L]	[mg/kg _{wwt}]	[mg/kg _{wwt}]	[mg/l]		
Etofenprox	4.05E-05	3.88E-06	2.41E-03	6.11E-03	3.36E-06		
αCO	n.c.	1.96E-06	n.c.	n.c.	n.c.		
4'-OH	n.c.	n.c.	5.39E-04	n.c.	n.c.		
n.c.: not concerned							

Summary table on calculated PEC values – NON-PRO						
	PEC _{STP} PEC _{water} PEC _{sed} PEC _{soil} PEC _{GW}					
	[mg/L]	[mg/L]	[mg/kg _{wwt}]	[mg/kg _{wwt}]	[mg/l]	
Etofenprox	1.20E-04	1.16E-05	7.17E-03	1.82E-02	1.00E-05	
αCO	n.c.	5.83E-06	n.c.	n.c.	n.c.	
4'-OH	n.c.	n.c.	1.60E-03	n.c.	n.c.	
n.c.: not concerned						

Primary and secondary poisoning

Primary poisoning

The product is intended to be used indoor. Therefore, primary poisoning, *i.e.* the direct consumption of the product by birds or mammals is not considered as relevant for the product.

Secondary poisoning

Summary table on calculated PEC values		
	PEC _{oral predator (fish)}	PEC _{oral predator} (earthworm)
	[mg/kg _{wet fish}]	[mg/kgwet earthworm]
Scenario 1	9.96E-03	1.44E-01

3.2.8.3 Risk characterisation

Atmosphere

Volatilization of Etofenprox is considered to be negligible based on its vapour pressure (8.13 \times 10⁻⁷ Pa at 25°C) and Henry's law constant (0.0136 Pa.m³.mole⁻¹ at 20°C) values. Etofenprox would not be transported over large distances in the atmosphere in gaseous phase.

<u>Conclusion</u>: Emissions and PECs in air are considered as negligible. It can be concluded that the use of the product FENOX will not pose a significant risk to the atmospheric compartment.

Sewage treatment plant (STP)

Summary table on calculated PEC/PNEC values			
Garania 1	PRO	NON-PRO PEC/PNEC _{STP}	
Scenario 1	PEC/PNEC _{STP}		
Etofenprox	1.80E-03	5.35E-03	
αCO	n.c.	n.c.	
4'-OH	n.c.	n.c.	

n.c.: not concerned

<u>Conclusion</u>: PEC/PNEC for the STP compartment is <1. The risk is therefore acceptable.

Aquatic compartment

Summary table on calculated PEC/PNEC values				
PRO				
Scenario 1 PEC/PNEC _{water} PEC/PNEC _{sed}				
Etofenprox	7.19E-01	3.83E-01		
αCO	4.46E-02	n.c.		

<fr></fr>	<ffnox></ffnox>	<pt18></pt18>

n.c.: not concerned

Summary table on calculated PEC/PNEC values			
NON-PRO			
Scenario 1 PEC/PNEC _{water} PEC/PNEC _{sed}			
Etofenprox 2.12 1.14			
αCO	1.33E-01	n.c.	
4'-OH	n.c.	1.34E-01	

n.c.: not concerned

 $\underline{\text{Conclusion}}$: PEC/PNEC for the freshwater and sediment compartments are <1 for etofenprox and its relevant metabolites for professional applications. The risks are therefore acceptable for professionals.

PEC/PNEC for the freshwater and sediment compartments are >1 for etofenprox for non-professional applications. The risks are therefore unacceptable for non-professionals

Terrestrial compartment

Calculated PEC/PNEC values			
PRO			
Scenario 1 PEC/PNEC _{soil}			
Etofenprox 9.64E-01			
αCO n.c.			
4'-OH	n.c.		

Calculated PEC/PNEC values			
NON-PRO			
Scenario 1 PEC/PNEC _{soil}			
Etofenprox 2.87			
αCO	n.c.		
4'-OH	n.c.		

<u>Conclusion</u>: PEC/PNEC for the soil compartment is <1 for professional applications. The risk is therefore acceptable for professional users.

PEC/PNEC for the soil compartment is >1 for non-professional applications. The risk is therefore unacceptable for non-professional users.

Groundwater

Etofenprox concentration in groundwater does not exceed the trigger value of 0.1 μ g/L. The risk is therefore acceptable.

Primary and secondary poisoning

Primary poisoning

The product is intended to be used indoor. Therefore, primary poisoning, *i.e.* the direct consumption of the product by birds or mammals is not considered as relevant for the product.

Secondary poisoning

Summary table on secondary poisoning				
Scenario	PEC _{fish} /PNEC _{birds}	PEC _{fish} /PNEC _{mammals}	PEC _{earthworm} /PNEC _{birds}	PEC _{earthworms} /PNEC _{mammals}
Scenario 1	2.99E-04	4.03E-04	4.33E-03	5.83E-03

<u>Conclusion</u>: No risk for secondary poisoning is expected to occur after Biocidal Product application.

Mixture toxicity

As no substance of concern has been identified, mixture toxicity is not relevant.

Aggregated exposure (combined for relevant emmission sources)

Aggregated exposure is not relevant since the environmental emissions are covered using a single scenario.

Overall conclusion on the risk assessment for the environment of the product

The environmental risk assessment of the product FENOX is based on the active substance and two environmentally relevant metabolites, αCO and 4'OH. No substance of concern has been identified for the environment.

The product FENOX will not pose risk to the environmental compartments for an application of the product in restricted areas (covered by the barrier treatment scenario) 2 times/year by professionals. Therefore, the specific instruction of use must be respected:

"The product has to be applied only on restricted areas on surfaces not regularly cleaned, for example:

- behind or under the fridge, under the kitchen sink, under the oven or the water heater, in all cracks and crevices that can be an harbourage for cockroaches.
- on the bedspring, on the feet of the bed, under furnitures, along plinths, behind headboard, on the wall behind the bed, furnitures and all crack and crevices that can be harbourage for bed bugs."

For non-professional users, a maximal use frequency of 2 times/year is not considered realistic as:

- more uses are expected by non-professional users considering the wide range of target organisms (bed bugs, cockroaches and stored goods attacking insects) that are present all year round and can occur throughout the house (stored goods attacking insects more likely in kitchen and bed bugs more likely in bedrooms etc);
- the target organisms are difficult to eradicate from the house, so in case of non-professional use reinfestation is likely.

Therefore, a simultaneity factor of 0.00815 (corresponding to 3-11 applications/year) should be applied leading to non-acceptable risks for the aquatic and terrestrial compartments. The product will not be authorized for non-professionals.

Overall conclusion on the risk assessment for the environment of the product is summarized in the table below:

Summary table for the risk assessment of the product FENOX						
	PEC/PNEC _{STP}	PEC/PNEC _{water}	PEC/PNEC _{sed}	PEC/PNEC _{soil}	PEC/PNEC _{GW}	
Scenario 1 PRO	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	
Scenario 1 NON-PRO	Acceptable	Non- acceptable	Non- acceptable	Non- acceptable	Acceptable	

3.2.9 Measures to protect man, animals and the environment

Please refer to summary of the product assessment and to the relevant sections of the assessment report

3.2.10 Assessment of a combination of biocidal products

Not relevant

3.2.11 Comparative assessment

3.2.11.1 Overall conclusion

In the technical guidance note on comparative assessment of biocidal products, it is stated that:

- a suitable number of available active substances having different modes of action on the harmful organism would be necessary to minimise resistance development or selection :
- as a general rule, at least three different and independent "active substance/mode of action" combinations should remain available through authorized BPs for a given use in order to consider that chemical diversity is adequate.

Considering that no only one products haves been identified as potential better alternatives for FENOX, FR CA concludes that there is currently no products with significantly lower overall risks for human health, animal health or the environment.

Since etofenprox does not meet the exclusion criteria as outlined in Article 5(1), no further assessment is needed at this point. The authorization for the product FENOX can be granted in accordance with the BPR 528/2012.

4 ANNEXES¹⁸

4.1 List of studies for the biocidal product

Author(s)	Year	Title. Source (where different from company) Company, Report No. GLP (where relevant) / (Un)Published	Data Protection Claimed (Yes/No)	Owner (PUB / ORG)
Richerioux, S.	2016	Final report: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 30°C for 3 years	Yes	LODI S.A.S.
Demangel, B.	2016	Physico-chemical tests before and after an accelerated storage procedure for 14 days at $54^{\circ}\text{C} \pm 2 ^{\circ}\text{C}$ and a low temperature stability storage for 7 days at $0 \pm 2 ^{\circ}\text{C}$ on ETOFENPROX 300 G/L EC	Yes	LODI S.A.S.
Tallon, A.	2016	Emulsion characteristics and reemulsification properties tests before and after an accelerated storage procedure at 54 °C ± 2 °C for 21 days on ETOFENPROX 300 G/L EC (diluted at 25%)	Yes	LODI S.A.S.
Tallon, A.	2016	Emulsion characteristics and re- emulsification properties tests before and after a storage procedure at 20°C ± 2 °C for 36 months on ETOFENPROX 300 G/L EC (diluted at 25%) - Interim report T initial	Yes	LODI S.A.S.
Tallon, A.	2016	Emulsion characteristics and re- emulsification properties tests before and after a storage procedure at 20°C ± 2 °C for 36 months on ETOFENPROX 300 G/L EC (diluted at 1%) - Interim report T initial	Yes	LODI S.A.S.
Mériadec, E.	2013	Acidity-alkalinity of Etofenprox 300 g/L	Yes	LODI S.A.S.
Meriadec, E.	2013	pH of Etofenprox 300 g/L EC	Yes	LODI S.A.S.
Demangel, B.	2013	Relative density of liquids on Etofenprox 300 g/L EC	Yes	LODI S.A.S.
Richerioux, S.	2013	Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 54 °C for 2 weeks	Yes	LODI S.A.S.
Richerioux, S.	2013	Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 54°C for 3 weeks	Yes	LODI S.A.S.

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¹⁸ When an annex in not relevant, please do not delete the title, but indicate the reason why the annex should not be included.

Richerioux, S.	2014	Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 20°C for 1 year	Yes	LODI S.A.S.
Richerioux, S.	2014	Interim report A: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 20°C for 2 years (analysis after 18 months of storage)	Yes	LODI S.A.S.
Richerioux, S.	2016	Study plan: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 20°C for 3 years	Yes	LODI S.A.S.
Richerioux, S.	2016	Final report: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 20°C for 3 years	Yes	LODI S.A.S.
Richerioux, S.	2014	Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 30°C for 1 year	Yes	LODI S.A.S.
Richerioux, S.	2014	Interim report A: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 30°C for 2 years (analysis after 18 months of storage)	Yes	LODI S.A.S.
Richerioux, S.	2015	Study report amendment no. 1: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 30°C for 2 years	Yes	LODI S.A.S.
Richerioux, S.	2016	Study plan: Chemical and packaging stability of Etofenprox 300 g/L EC after storage at 30°C for 3 years	Yes	LODI S.A.S.
Richerioux, S.	2015	Packaging stability of Etofenprox 300g/L EC after 3 weeks at 54°C±2°C	Yes	LODI S.A.S.
Richerioux, S.	2015	Chemical and Packaging stability of Etofenprox 300g/L after storage at 20°C for 2 years	Yes	LODI S.A.S.
Demangel, B.	2015	Physico-chemical tests before and after an accelerated storage procedure at 54 °C ± 2 °C for 14 days on ETOFENPROX 300 G/L EC	Yes	LODI S.A.S.
Doyen, A.	2015	Persistent foaming test on ETOFENPROX 300 G/L EC	Yes	LODI S.A.S.
Demangel, B.	2015	Emulsion characteristics and reemulsification properties and determination of pH values tests before and after low temperature stability of liquid formulations at 0 ± 2 °C for 7 days on ETOFENPROX 300 G/L EC	Yes	LODI S.A.S.
Demangel, B.	2015	Determination of pH values test before and after an accelerated storage procedure at 54 °C ± 2 °C for 14 and 21 days on ETOFENPROX 300 G/L EC	Yes	LODI S.A.S.

Demangel,	2015	Emulsion characteristics and re-	Yes	LODI
B.	2013	emulsification properties and	163	S.A.S.
J.		determination of pH values tests before		017 (101
		and after low temperature stability of		
		liquid formulations at 0 ± 2 °C for 7		
		days on ETOFENPROX 300 G/L EC		
Demangel,	2013	Amended report: Persistent foaming	Yes	LODI
В.		test on Etofenprox 300 g/L EC		S.A.S.
LODI	2012	Certificate of stability after dilution 1%	Yes	LODI
GROUP		v/v of Fenox		S.A.S.
Benjamin,	2013	Surface tension test on Etofenprox 300	Yes	LODI
D.	2012	g/L EC	.,	S.A.S.
Meriadec,	2013	Study report amendment No 1,	Yes	LODI
E.	2012	viscosity of Etofenprox 300 g/L EC	V	S.A.S.
Meriadec, E.	2013	Viscosity of Etofenprox 300 g/L EC	Yes	LODI
Richerioux,	2013	Explosive properties of Etofenprox 300	Yes	S.A.S. LODI
S.	2013	g/L EC	165	S.A.S.
Richerioux,	2015	Study report amendment no. 1:	Yes	LODI
S.		Explosive properties of Etofenprox 300	. 65	S.A.S.
		g/L EC		
Richerioux,	2015	Oxidising properties of Etofenprox 300	Yes	LODI
S.		g/L EC		S.A.S.
Zurita	2015	Etofenprox 300g/L EC: Corrosive to	Yes	LODI
Blasco, D.		metals		S.A.S.
K. Arif	2022	UN Heat Accumulation Storage Test	Yes	LODI
		(SADT - H.4 Test) on a Sample of		S.A.S.
	2012	FENOX		1007
Demangel,	2013	Self ignition temperature of liquids on	Yes	LODI
B. Demangel,	2013	Etofenprox 300 g/L EC Flash point test on Etofenprox 300 g/L	Yes	S.A.S. LODI
B.	2013	EC	165	S.A.S.
Zurita	2015	Etofenprox 300g/L EC: Self-reactive	Yes	LODI
Blasco, D	2010	properties	. 65	S.A.S.
Richerioux,	2015	Pyrophoric properties of Etofenprox 300	Yes	LODI
S.		g/L EC		S.A.S.
Richerioux,	2012	Analytical method validation for	Yes	LODI
S.		determination of Etofenprox in		S.A.S.
		Etofenprox 300g/L EC		
		Field testing of the efficacy of a residual	Yes	LODI
Serrano, B.	2015	insecticide spray treatment to control		S.A.S.
		German cockroaches – Report 1894-		
		1a/0215R	Vac	LODI
		Laboratory comparison of the effectiveness of two insecticide	Yes	LODI S.A.S.
		products intended for the control of		J.A.J.
Serrano, B.	2015	crawling insects in household		
50		environment (Target organisms:		
		German cockroaches and black ants) –		
		Report 1889/0215R		
		Field testing of the efficacy of a residual	Yes	LODI
Serrano, B.	2015	insecticide spray treatment to control		S.A.S.
Jerrano, D.	2013	Bed bugs <i>Cimex lectularius</i> – Report		
		1894-6/0215R		

Serrano, B.	2015	Field testing of the efficacy of a residual insecticide spray treatment to control Oriental cockroaches – Report 1894-1b/0215R	Yes	LODI S.A.S.
Serrano, B.	2016	Laboratory trial of the efficacy of the product "FENOX" against various flying and crawling target organisms – Report 2055c-F-LAB/0316R	Yes	LODI S.A.S.
Serrano, B.	2016	Simulated use trial of the efficacy of an insecticidal product intended to control various pests – Report 2055d-F-SIM/0316R	Yes	LODI S.A.S.
Serrano, B.	2016	Field trial of the efficacy of an insecticide applied as a space or surface treatment against flies, stable flies, ants, bed bugs and eight stored products pests – Report 2055f-F-FI/0316R	Yes	LODI S.A.S.
Guicherd A.	2017	Evaluation of the efficacy of an emulsifiable concentrate containing 300g/I Etofenprox for the control of bed bug (<i>Cimex lectularius</i>) infestations Field Trial: France, 2017 – Report n°17LODCI001	Yes	LODI S.A.S.
xxx	2009	Etofenprox 30CE: Acute oral toxicity in the rat, Acute toxic class method	Yes	LODI S.A.S.
XXX	2013	Etofenprox 300 g/L EC: Acute inhalation toxicity (nose only) study in the rat	Yes	LODI S.A.S.
XXX	2013	Etofenprox 300 g/L EC: Evaluation of acute dermal toxicity in rats	Yes	LODI S.A.S.
XXX	2013	Etofenprox 300 g/L EC: Assessment of acute dermal irritation	Yes	LODI S.A.S.
xxx	2013	Etofenprox 300 g/L EC: Assessment of acute eye irritation	Yes	LODI S.A.S.
XXX	2013	Etofenprox 300 g/L EC: Assessment of sensitising properties on albino guinea pigs: Maximisation test according to Magnusson and Kligman	Yes	LODI S.A.S.
Webbley, K.	2015	The in vitro dermal absorption of radiolabelled etofenprox in two formulated products for biocidal use	Yes	LODI S.A.S.
Webbley, K.	2015	Report amendment: The in vitro dermal absorption of radiolabelled etofenprox in two formulated products for biocidal use	Yes	LODI S.A.S.

4.2 Output tables from exposure assessment tools





4.3 Confidential annex

See separate document.