

<b>Section 7.4.3.5.2b</b>		<b>Aquatic marine plants toxicity</b>	
<b>Annex Point IIIA 13.4.3</b>			
		<b>JUSTIFICATION FOR NON-SUBMISSION OF DATA</b>	Official use only
<b>Other existing data</b> <input checked="" type="checkbox"/>	<b>Technically not feasible</b> <input checked="" type="checkbox"/>	<b>Scientifically unjustified</b> <input checked="" type="checkbox"/>	
<b>Limited exposure</b> <input checked="" type="checkbox"/>	<b>Other justification</b> [..].		
<b>Detailed justification:</b>	<p>A test on effects on marine aquatic plants was not performed due to the following reasons:</p> <p>In seawater the active dichlofluanid is very rapidly hydrolysed and detoxified to DMSA (Dimethylaminosulfanilide, CAS 4710-17-2). The DT 50 of dichlofluanid at pH 8.2 and 20°C is 1.2 hours. Therefore no long time exposure of marine plants to dichlofluanid can be expected.</p> <p>In addition the rapid degradation of the active at high pH values causes problems with regard to the technical feasibility of the test.</p> <p>For the degradation product of tolylfluanid DMST* a test on <i>lemmma gibba</i> is available which showed only a very slight toxicity of the degradation product to aquatic plants. From this results is can be concluded that aquatic plants are not organisms being at risk with regard to aqua toxicity. For DMST* toxicity to algae or diatoms is higher in the respective test.</p> <p>Taking the above mentioned arguments into account it is justified not to perform a test on marine plants toxicity of dichlofluanid.</p> <p>* DMST (Dimethylaminosulfotoluidid, CAS 66840-71-29) is the degradation product of tolylfluanid (CAS 7311-37-1), an active very similar to dichlofluanid with regard to chemical structure, aqua-toxicity and environmental behaviour including the degradation product. Data for DMST are bridged to DMSA in the scope of the PT 21 dossier for dichlofluanid.</p>		
<b>Undertaking of intended data submission</b> <input type="checkbox"/>	–		
<b>Evaluation by Competent Authorities</b>			
<i>Use separate "evaluation boxes" to provide transparency as to the comments and views submitted</i>			
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>			
<b>Date</b>	19/11/13		

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<b>Evaluation of applicant's justification</b>	The Applicant's justification is considered acceptable. Other information on the toxicity and mode of action of dichlofluanid (& its metabolites) indicates that it is not especially herbicidally active and aquatic macrophytes will not be the most sensitive group driving the risk assessment.
<b>Conclusion</b>	The Applicant's justification is accepted, no further data are required.
<b>Remarks</b>	
	<b>COMMENTS FROM OTHER MEMBER STATE</b> ( <i>specify</i> )
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Evaluation of applicant's justification</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	