

Section A7.5.1.3 Acute toxicity to terrestrial plants		
Annex Point IIIA7.5.1.3		
JUSTIFICATION FOR NON-SUBMISSION OF DATA		Official use only
Other existing data <input checked="" type="checkbox"/>	Technically not feasible <input type="checkbox"/>	Scientifically unjustified <input type="checkbox"/>
Limited exposure <input type="checkbox"/>	Other justification [...]	
Detailed justification:	<p>For dichlofluanid a test on terrestrial plant toxicity (Draft OECD 208A) was performed. Tier I of the test was done with 100 mg dichlofluanid/kg soil (dry weight). At this administration in one of the three plant species effects on biomass of 29 % were seen, which did not exceed the 50 % trigger to merit the next tier for non-target terrestrial plant studies.</p> <p>No further testing (tier II) on toxicity to soil non-target plants is regarded to be justified because:</p> <ol style="list-style-type: none"> from tier I a low effect concentration or a (worst case) EC50 with respect to the plants tested of 100 mg/kg soil can be derived, dichlofluanid degrades rapidly in soil, <p>Furthermore, the 29% reduction in biomass in one of three species does not exceed the 50 % trigger for tier II test (dose response curve). In the draft OECD guideline 208A this trigger is related to the highest test concentration of 1000 mg/kg soil. It is regarded to be reliable to apply it also to a lower concentration because the maximal exposure concentrations from the use of the active as wood preservative are far below the 100 mg/kg concentration applied in the test.</p>	
Undertaking of intended data submission <input type="checkbox"/>	–	
Evaluation by Competent Authorities		
<i>Use separate "evaluation boxes" to provide transparency as to the comments and views submitted</i>		
EVALUATION BY RAPPORTEUR MEMBER STATE		
Date	13/12/04	

Section A7.5.1.3	Acute toxicity to terrestrial plants
Annex Point IIIA7.5.1.3	
Evaluation of applicant's justification	<p>The applicant has submitted a justification for non-submission of any further terrestrial plant toxicity testing based on the results of the limit test.</p> <p>The limit test has been evaluated by the UK CA and is considered acceptable for the purposes of risk assessment. The limit test was performed at a concentration of 100 mg/kg soil, the applicant has chosen this concentration for the limit test based on the use pattern and exposure of the product to soil. In the July 2000 draft of OECD 208 A for a limit test with a general chemical a concentration of 1000 mg/kg dry soil is suggested, but for crop protection products the guideline specifies that the physical-chemical properties, use pattern, maximum application rate, number of applications per season and/or the persistence of the test compound need to be taken into consideration when determining the appropriate concentration for the limit test. The UK CA supports the applicant's reasoning that for a wood preservative a similar assessment can be made, taking into consideration the use pattern in particular, to reduce the limit test concentration from 1000 to 100 mg/kg dry soil.</p> <p>The applicant has used the LOEC as a worst-case EC₅₀ in the risk assessment which is considered to be very precautionary and the risk assessment is still acceptable.</p>
Conclusion	Applicant's justification is acceptable
Remarks	
	COMMENTS FROM OTHER MEMBER STATE (<i>specify</i>)
Date	<i>Give date of comments submitted</i>
Evaluation of applicant's justification	<i>Discuss if deviating from view of rapporteur member state</i>
Conclusion	<i>Discuss if deviating from view of rapporteur member state</i>
Remarks	