

Committee for Risk Assessment RAC

Annex 3 **Records**

of the targeted public consultation following the submission of additional information on the hazard to the aquatic environment

cypermethrin (ISO); α-cyano-3-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2dimethylcyclopropanecarboxylate; cypermethrin cis/trans +/- 40/60

> EC Number: 257-842-9 CAS Number: 52315-07-8

> CLH-O-0000006733-71-01/F

Adopted
5 December 2019

ANNEX 3 - RECORDS OF THE TARGETED PUBLIC CONSULTATION MMMMMMMMMMON CYPERMETHRIN (ISO); A-CYANO-3-PHENOXYBENZYL 3-(2,2-DICHLOROVINYL)-2,2-DIMETHYLCYCLOPROPANECARBOXYLATE; CYPERMETHRIN CIS/TRANS +/- 40/60

COMMENTS AND RESPONSE TO COMMENTS ON CLH: PROPOSAL AND JUSTIFICATION

The proposal for the harmonised classification and labelling (CLH) of (cypermethrin (ISO); α -cyano-3-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate; cypermethrin cis/trans +/- 40/60, EC 257-842-9; CAS 52315-07-8) was submitted by Belgium and was subject to a public consultation, from 21/01/2019 to 22/03/2019. The comments received by that date are compiled in Annex 2 to the opinion.

After the above public consultation, a study report containing additional information on the hazard to the aquatic environment was submitted to EFSA. The information is relevant to the assessment of the environmental hazards for this substance. The study report is the subject of the present targeted public consultation. A target consultation was launched from 07/10/2019 to 21/10/2019 and the comments received are listed below.

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Substance name: cypermethrin (ISO); α -cyano-3-phenoxybenzyl 3-(2,2-

dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate; cypermethrin cis/trans +/-

40/60

EC number: 257-842-9 CAS number: 52315-07-8 Dossier submitter: Belgium

OTHER HAZARDS AND ENDPOINTS - Hazardous to the Aquatic Environment

Date	Country	Organisation	Type of Organisation	Comment number			
21.10.2019	Germany		MemberState	1			
Comment received							
The DE-CA has reviewed the study and agrees with the revised M-factor (acute) of 100000 based on the new valid data (LC50 = 5.3 ng/L for Hyallela azteca and 6.9 ng/L for Chironomus riparius).							
RAC's response							
Thank you for the support.							

Date	Country	Organisation	Type of Organisation	Comment number
21.10.2019	United Kingdom		MemberState	2

Comment received

We agree that the new acute toxicity to Hyalella azteca and Chironomus riparius study is reliable and should be considered for hazard classification. These new data would result in an Aquatic Acute 1 classification with an M-factor of 100,000. As no chronic toxicity data are available for Hyalella azteca in the CLH report, the surrogate approach based on this H. azteca EC50 would lead to an Aquatic Chronic 1 classification with an M-factor of 100,000.

We note that the isomeric composition of the test material was not stated in the study report. This is relevant due to different isomeric toxicity. The recent Proposal for Harmonised Classification and Labelling dated 9 November 2018 for cypermethrin considered cypermethrin with an isomeric composition of cis/trans +/- 40 / 60 only.

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RAC's response

Thank you for the support to the proposed value of acute M-factor based on the newly included study of Rapley & Hamer, 1996.

The opinion on using the surrogate approach for setting the chronic M-factor will be discussed on the plenary session of RAC, together with some other options.

The clarification of the isomeric composition of the substance will also be dicussed on the plenary. The indirect proof for the compliance of the substance is the inclusion of the study into the EDSA review. The EFSA Review refers to the FAO specification (332/TC/S/F, 1993), and the EU requirement on minimum purity of the active substance "as manufactured", and the isomeric ratio (EFSA Review, 2018).

The toxicity of the eight isomers/enantiomers shows large variability, but the main components, i.e. the two toxically active isomers (1R-cis-alphaS and 1R-trans-alphaS) do not differ significantly in ecotoxicity.