

From: "5.1.2.e (5.1.2.e)"
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To: "5.1.2.e (5.1.2.e)" <5.1.2.e>; "5.1.2.e (5.1.2.e)" <5.1.2.e>
Subject: Voorstel voor Mail Syngenta

Bleker meldde gisteravond in de Tweede Kamer dat er drie toepassingen van middelen op basis van neonicotinoïden zijn die opgeschort moeten worden, tenzij binnen een paar dagen mitigerende maatregelen voorgesteld zijn die het risico voldoende reduceren.

Het betreft hier één van uw middelen op basis van de stof thiamethoxam: Actara.

Hieronder volgt de beoordeling die opgesteld is in de eerste fase van de herbeoordeling, voor het onderdeel waar Bleker over sprak. Voor deze professionele spuittoepassing betreft dit de toepassing in hoge boomkwekerijgewassen (opzetters). Uit onderstaande blijkt waarom het Ctgb geen mogelijkheden ziet voor risicoreducerende maatregelen voor deze toepassingen.

Professional uses of plant protection products: spray treatments

toelatingnr	middelnaam	toelatinghouder	werkzame stoffen	toepassing	formulering	Toepassing(en)
12679	ACTARA	Syngenta Crop Protection B.V.	thiamethoxam 25%	Professioneel	Water dispergeerbaar granulaat	Gewasbehandeling in aardappelen, bedekte teelt van knol- en bolbloemgewassen, onbedekte en bedekte teelt van bloemisterij- en boomkwekerijgewassen en vaste planten; Grondbehandeling van aardappelen. Bijzinnen op WG en toepassing alleen voor en na de bloei.

2) Off-field risk

Considering the toxicity of the a.s., also an off-field risk assessment is performed. The drift rate used is the same as for the evaluation of non-target arthropods. This is 10% for field uses and maximally 6.3% for high tree nursery crops. Glasshouse uses and soil treatments do not cause drift exposure to off-field. See Table E.10b.

Table E.10b Risk for bees of thiamethoxam off-field

Use	Application rate a.s. [g/ha]	Drift %	Exposure [g/ha]	LD ₅₀ [µg/bee]	HQ [Rate/LD ₅₀]	Trigger value
Potatoes (ware, starch and seed) (against aphids and Colorado beetle)	20	10%	2	0.005	400	50

Floriculture, tree nursery and perennials (G) (<i>against aphids</i>)	25	n.a.	n.a.	0.005	n.a.	50
Floriculture, tree nursery and perennials (G) (<i>against whitefly</i>)	100	n.a.	n.a.	0.005	n.a.	50
Floriculture, tree nursery and perennials (F) (<i>against aphids</i>)	25	10%	2.5	0.005	500	50
tree nursery: opzetters (F) (<i>against aphids</i>)	25	6.3%	1.6	0.005	315	50
tree nursery: opzetters (F) (<i>against whitefly</i>)	100	6.3%	6.3	0.005	1260	50
Potato (seed) soil treatment	25	n.a.	n.a.	0.005	n.a.	50
Bulb flowers and flower bulbs (glasshouse)	25	n.a.	n.a.	0.005	n.a.	50

Table E.10b shows that there is a potential off-field risk for the field uses (except for the soil treatment of potatoes).

To refine the off-field risk for the field uses, higher tier studies will be considered to see if there is a dose rate at which no effects are expected. Note that restriction sentences are not feasible for the off-field.

There is one cage test in which effects of low dose rates (1 and 5 g a.s./ha) were checked. At 5 g a.s./ha, mortality was slightly increased on the first day after application only (checked for 7 days), both when applied during and after bee flight. Also, behavioural effects and reduced foraging activity were seen. At 1 g a.s./ha, the only effect seen was a slight decrease of foraging activity on the first day after application. No effects on brood development and colony strength were found at both dose rates (checked until 27 days after treatment).

A dose rate of 1 g a.s./ha is considered to be an acceptable rate. This rate can be achieved with drift reduction, based on Annex III-2 of chapter 7 of the Evaluation Manual (version 1.0). See Table E.11 for the options for risk mitigation for the different uses. For all crops, the evaluation zone is 50-150 cm. Only the measures which are implemented in practice on a reasonable scale are proposed.

Table E.11 Required drift measures to reach acceptable risk for bees of thiamethoxam off-field

Use	Appl. rate [g/ha]	Maximum		Available drift reducing measure
		acceptable concentration [g/ha]	Required drift rate %	
Potatoes (ware, starch and seed) (<i>against aphids and Colorado beetle</i>)	20	1	5%	Driftarme spuitdop + kantdop + luchtondersteuning;
Floriculture, tree nursery and perennials (F) (<i>against aphids</i>) If rosebushes, small confiners, other ornamental bushes and	25	1	4%	Driftarme spuitdop + kantdop + luchtondersteuning;

climbing plants, bush and hedge public gardens, perennials, conifers Floriculture, tree nursery and perennials (F) <i>(against aphids)</i> If rosebushes, small conifers, other ornamentl bushes and climbing plants, bush and hedge public gardens, perennials, conifers Floriculture, tree nursery and perennials (F) <i>(against whitefly)</i> If ornamentals	100	1	1%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.
Floriculture, tree nursery and perennials (F) <i>(against whitefly)</i> If ornamentals	25	1	1%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.
Floriculture, tree nursery and perennials (F) <i>(against whitefly)</i> If ornamentals	100	1	1%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.
Floriculture, tree nursery and perennials (F) <i>(against whitefly)</i> If opzetters	25	1	1%	-
Floriculture, tree nursery and perennials (F) <i>(against whitefly)</i> If opzetters	100	1	1%	-

Table E.10b shows that for most uses, there are options available to reduce the exposure off-field to a level at which no effects are expected. The final drift reduction will be determined together with the applicant. For the use in high trees in tree nursery, no drift reduction measures are available. This use cannot be allowed.