

**From:** "5.1.2.e (5.1.2.e)"  
**Sent:** Thu, 14 Apr 2011 10:57:33 +0100  
**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:** FW: Sorry dit is het definitieve voorstel voor Mail Bayer

Nog een aanpassing, met nog een particulier middel (Admire N-Pin) waarvan de buitentoepassing niet kan, die had ik even over het hoofd gezien.

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**Van:** 5.1.2.e (5.1.2.e)  
**Verzonden:** 14 April 2011 11:50  
**Aan:** 5.1.2.e (5.1.2.e); 5.1.2.e (5.1.2.e)  
**Onderwerp:** FW: Voorstel voor Mail Bayer

Aanpassing waarin afgeleides van Provado Garden toegevoegd zijn die ook van Bayer zijn. Deze moeten ook van de markt.

Admire heeft ook twee afgeleides, van R. van Wesemael en Makhteshim, daarvoor zouden ook de intrekkingen van grote bomen gelden. En Admire N-Pin heeft een afgeleide van Pokon.

Lichten we die firma's nu ook in of is dat de verantwoordelijkheid van de moeder?

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**Van:** 5.1.2.e (5.1.2.e)  
**Verzonden:** 14 April 2011 10:37  
**Aan:** 5.1.2.e (5.1.2.e); 5.1.2.e (5.1.2.e)  
**Onderwerp:** Voorstel voor Mail Bayer

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 vier van uw middelen op basis van de stof imidacloprid: Admire, Admire O-Teq, [Admire N-Pin](#) en Provado Garden, plus twee afgeleide toelatingen van [Provado Garden](#): Admire N en Gazon-Insect.

Hieronder volgt de beoordeling die opgesteld is in de eerste fase van de herbeoordeling, voor het onderdeel waar Bleker over sprak. Voor de twee professionele spuittoepassingen betreft dit de toepassingen in appel en peer en hoge boomkwekerijgewassen (opzetters). Voor de niet-professionele middelen betreft het de buitentoepassingen. Uit onderstaande blijkt waarom het Ctgb geen mogelijkheden ziet voor risicoreducerende maatregelen voor deze toepassingen.

### Professional uses – spray application

toelatingnr	middelnaam	toelatinghouder	werkzame stoffen	dosering	formulering	Toepassing(en)
12942	ADMIRE O-TEQ	Bayer CropScience B.V.	imidacloprid 350G/L	70-105 g a.s./ha – see Table 1	Olie dispersie	Gewasbehandeling in appel en peer, vruchtgroenten onder glas, bloemisterijgewassen buiten en onder glas, bloembol- en bloemknol, boomkwekerij en vaste planten, hop,

						pennenteel van witlof. Bijenzin op WG.
11483 (parallel: 11547, 13363)	ADMIRE	Bayer CropScience B.V.	imidacloprid 70%	15.7- 1960 g a.s./ha – see Table 2	Water dispergeerbaar granulaat	Gewasbehandeling in appel en peer, vruchtgroenten onder glas, bloemisterijgewassen buiten en onder glas, bloembol- en bloemknol, boomkwekerij en vaste planten. Bijenzin op WG.

#### Direct exposure via spray

#### 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, 37.5% for orchards (before May 1<sup>st</sup>) 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.2.

**Table E.2 Risk for bees of imidacloprid off-field**

Use	Application rate a.s.	Drift %	Exposure	LD <sub>50</sub>	HQ	Trigger value
	[g/ha]		[g/ha]	[µg/bee]	[Rate/LD <sub>50</sub> ]	
Apple and pear	105	37.5%	39	0.0037	<b>10641</b>	50
Flower bulbs, bulb flowers	70	10%	7	0.0037	<b>1892</b>	50
Floriculture crops, tree nursery and perennials	84	10%	8.4	0.0037	<b>2270</b>	50
Tree nursery, high plants ('opzetters')	84	6.7%	5.6	0.0037	<b>1521</b>	50

Table E.10b shows that there is a potential off-field risk for the field uses. This risk was also highlighted in the EFSA conclusion: *Overall it is concluded that the spray applications of imidacloprid pose a high risk to bees. Risk mitigation is required for the use in orchards. The risk to bees is considered to be low if the product is not applied during flowering and if flowering weeds are removed/mown before the product is applied. However it should be noted that bees potentially foraging in the off-crop area would still be exposed via spray drift and hence not be protected by the suggested risk mitigation measure.*

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. A cage study with flowering *Phacelia tanacetifolia* (Bakker, 2001, cage study p in LoE) is available. It was demonstrated that when Imidacloprid SL 200 is applied during bee flight, rates of 0.6 and 1.2 g a.s./ha had no effects on mortality and foraging activity.

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

Use	Appl. rate	Maximum acceptable	Required drift rate	Available drift reducing measure
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		concentration		
	[g/ha]	[g/ha]	%	
Apple and pear	105	1.2	1%	No measures available.
Flower bulbs, bulb flowers	70	1.2	1.7%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.
Floriculture crops, tree nursery and perennials	84	1.2	1.4%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.
Tree nursery, high plants	84	1.2	1.4%	Lage spuitboomhoogte (30 cm boven de top van het gewas) + driftarme Venturidop + kantdop + luchtondersteuning.

Table E.11 shows that drift mitigation to reach to acceptable off-field risk is possible for most uses. The necessary drift reduction will be discussed further with the applicant.

However, for apple and pear no acceptable off-field risk can be reached. These uses may have to be withdrawn.

### Non-professional uses

toelatingnr	middelnaam	toelatinghouder	werkzame stoffen	formulering	Toepassing(en)
11998 (afgeleide: 12219)	ADMIRE N PIN	Bayer CropScience B.V.	imidacloprid 2,5%	Plantenstaafje	Sierplanten in potten en bakken. Restrictie: bijenzin (niet op bloeiende planten etc).

Admire N Pin is a plant stick which is used in ornamentals in pots. Currently, the use is allowed indoors as well as outdoors (most recent risk assessment 1999). A restriction is placed on the label to prevent the use on flowering plants and on plants on which bees are actively foraging. However, this restriction is not considered adequate due to the delayed working mechanism of the sticks. The pins are inserted into the soil. The active substance is then taken up in the plants from the soil. After insertion in the soil, it takes one to three weeks to reach a sufficient level in the plant to affect pests, but once this is reached, the product can be effective for several weeks. Since the label states that application may be repeated, plants may contain imidacloprid for up to several months. So, even if non-professional users obey the label and take care to not apply the sticks on plants that are flowering at that time, exposure may still occur when flowers appear weeks after application of the sticks. Therefore, the restriction sentence is not considered clear enough to prevent exposure of honeybees through nectar and/or pollen of flowering ornamentals from non-professional use. There are no data available to estimate the residue level in nectar and pollen for this particular use as a plant stick and it is thus not possible to estimate the risk to honeybees. Therefore, the use should be restricted to indoor use only (exposure to honeybees from use in private houses is considered to be negligible). This should be clearly mentioned on the label with the following sentence:

*Toegestaan is uitsluitend het gebruik als insectenbestrijdingsmiddel bij sierplanten in potten en bakken binnenshuis.*

With this sentence, the risk to bees is considered to be acceptable.

toelatingnr	middelnaam	toelatinghouder	werkzame stoffen	formulering	Toepassing(en)
12115 (afgeleides: 12945, 12919)	PROVADO GARDEN	Bayer CropScience B.V.	imidacloprid 5%	Water dispergeerbaar granulaat	Gewasbehandeling in siergewassen en appels en peren of particuliere boomgaard, en aangietbehandeling in gazon. Bijenrestrictiezin op etiket.

Provado Garden is used as a spray in ornamentals and apple and pear orchards and as a pouring use in lawns. Complicated restrictions are indicated on the label to avoid risks to bees:

*Toegestaan is uitsluitend het gebruik als insectenbestrijdingsmiddel:*

- in siergewassen in de tuin, met dien verstande dat toepassing alleen is toegestaan vóór de bloei tot het zichtbaar worden van de eerste bloemknoppen, alsmede na de bloei.*
- in appels en peren in de tuin of particuliere boomgaard, door middel van een gewasbehandeling met een maximum aantal behandelingen van totaal twee keer per seizoen, met uitzondering van de periode dat de bloemknoppen zichtbaar zijn.*
- in het gazon, door middel van een aangietbehandeling met dien verstande dat het middel maximaal één keer per jaar wordt toegepast.*

*Gevaarlijk voor bijen en hommels. Om de bijen en hommels te beschermen mag u dit product niet gebruiken op in bloei staande gewassen. Gebruik dit product niet op plaatsen waar bijen en hommels actief naar voedsel zoeken.*

*Gebruik dit product niet in de buurt van in bloei staand onkruid. Verwijder onkruid voordat het bloeit.*

Imidacloprid is very toxic to bees. Therefore, high risk to bees is expected if the product is not used adequately, especially from the spray uses (in-field as well as off-field). It is not considered realistic that non—professional users will read the label carefully and obey this kind of complicated restrictions. No controlling system is in place for non-professional users. Furthermore, the restrictions do not prevent exposure of bees outside the treated area from spray drift. Therefore, the spray uses of Provado Garden cannot be allowed.

The pouring use in lawns is intended to control root-eating larvae. According to the label, the product should preferably be applied in the evening and application should be followed by immediate irrigation. Direct exposure to bees is not expected. However, since imidacloprid is systemic, uptake in sapstreams is expected. Exposure could occur from 1) honeydew and 2) nectar and pollen (from flowering crop itself or flowering weeds).

Exposure from honey dew: Risk from exposure to honeydew excreted by aphids and contaminated with residues derived from seed dressing is not of concern because the oral LD<sub>50</sub> of imidacloprid for aphids is much lower (0.000 000 5 µg as/aphid) than for bees (0.004 µg as/bee). Therefore it can be assumed that appreciable amounts of honeydew will only be present at residue concentrations that are not relevant for bees. This line of argumentation was agreed during EU peer review but it was not clear how the toxicity

value for aphids was derived and the experts suggested a data gap for the applicant to clarify this point. This still has to be clarified, but for the present uses in grass, aphids are not considered a concern. Therefore the risk via this route is acceptable.

Exposure from nectar and pollen: in non-professional lawns, flowering plants may occur and these may be directly exposed during application. This may lead to locally very high exposure to bees on the day following application. Restrictions against application on flowering plants are not accepted for non-professional users. Therefore no acceptable risk to bees is expected from the proposed pouring use in lawns of Provado Garden.

#### Conclusion

The uses of Provado Garden cannot be allowed.