Bundesamt für Verbraucherschutz und Lebensmittelsicherheit

Commenting via Connect.EFSA – issues identified

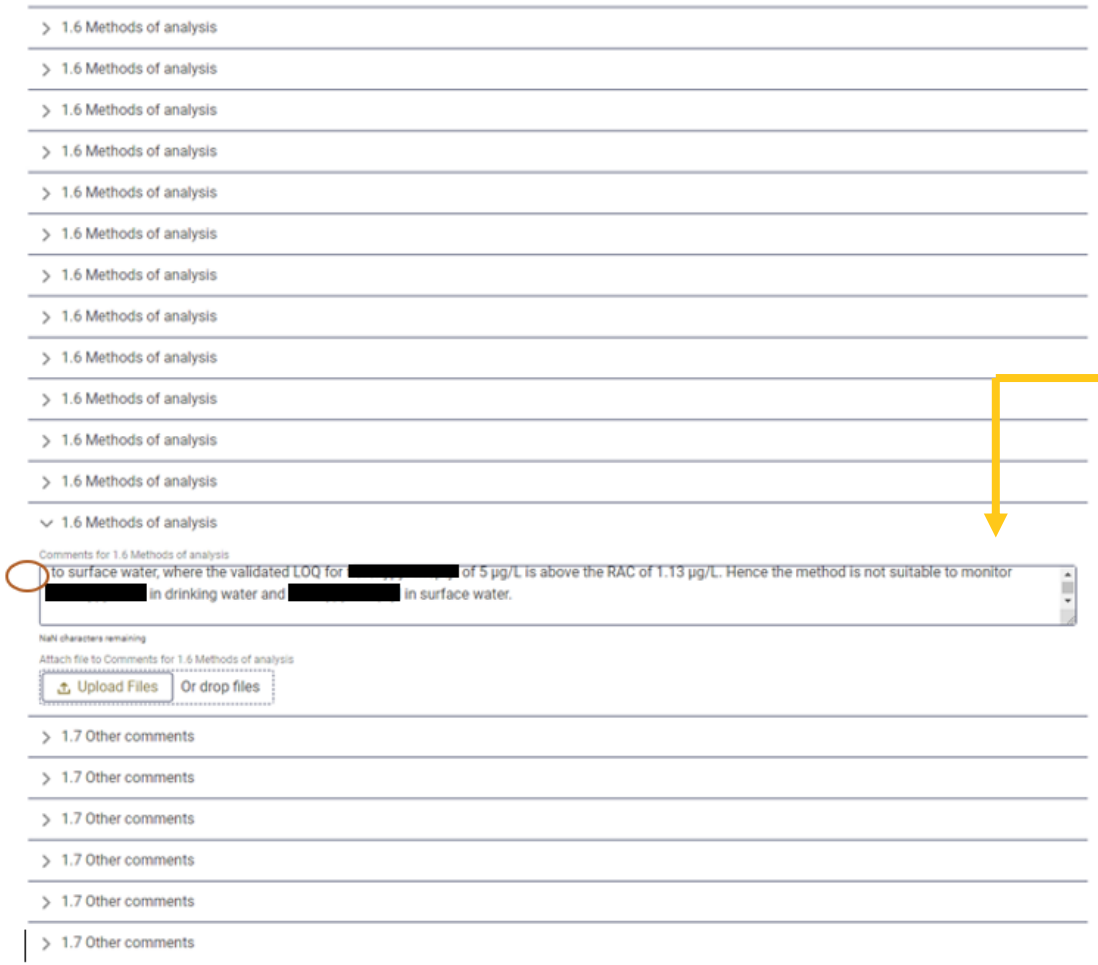
Only one person can contribute for each active substance

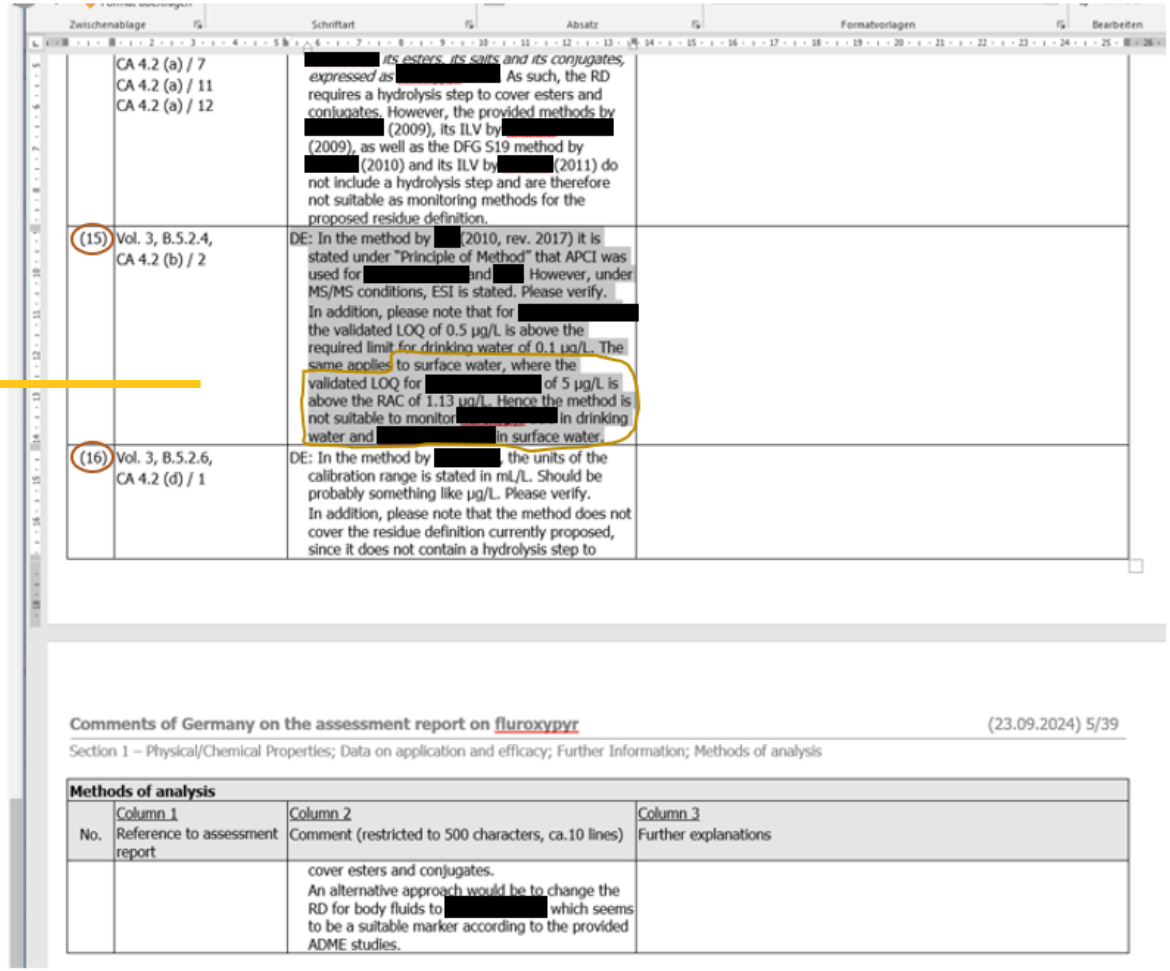
- **When you open Connect EFSA, only that person can comment.**

- **We propose that at least a second person be allowed to add comments to ensure that a comment can be submitted on time, even if the first person is unavailable.**

Commenting in Connect.EFSA

Not enough fields for comments in Connect.EFSA





	CA 4.2 (a) / 7 CA 4.2 (a) / 11 CA 4.2 (a) / 12	[redacted] *its esters, its salts and its conjugates, expressed as* [redacted] As such, the RD requires a hydrolysis step to cover esters and conjugates. However, the provided methods by [redacted] (2009), its ILV by [redacted] (2009), as well as the DFG S19 method by [redacted] (2010) and its ILV by [redacted] (2011) do not include a hydrolysis step and are therefore not suitable as monitoring methods for the proposed residue definition.	
(15)	Vol. 3, B.5.2.4, CA 4.2 (b) / 2	DE: In the method by [redacted] (2010, rev. 2017) it is stated under "Principle of Method" that APCI was used for [redacted] and [redacted] However, under MS/MS conditions, ESI is stated. Please verify. In addition, please note that for [redacted] the validated LOQ of 0.5 µg/L is above the required limit for drinking water of 0.1 µg/L. The same applies to surface water, where the validated LOQ for [redacted] of 5 µg/L is above the RAC of 1.13 µg/L. Hence the method is not suitable to monitor [redacted] in drinking water and [redacted] in surface water.	
(16)	Vol. 3, B.5.2.6, CA 4.2 (d) / 1	DE: In the method by [redacted] the units of the calibration range is stated in mL/L. Should be probably something like µg/L. Please verify. In addition, please note that the method does not cover the residue definition currently proposed, since it does not contain a hydrolysis step to	

Comments of Germany on the assessment report on fluroxypyr (23.09.2024) 5/39

Section 1 – Physical/Chemical Properties; Data on application and efficacy; Further Information; Methods of analysis

Methods of analysis			
No.	Column 1 Reference to assessment report	Column 2 Comment (restricted to 500 characters, ca.10 lines)	Column 3 Further explanations
		cover esters and conjugates. An alternative approach would be to change the RD for body fluids to [redacted] which seems to be a suitable marker according to the provided ADME studies.	

Microorganisms – differences between Connect.EFSA and commenting table

Section 1

Connect.EFSA	Commenting Template
1 Identity of the microorganism 1.1 Identity 2 Biological properties of the microorganism – Technical properties of the preparation 2.1 Biological properties of the microorganism 2.2 Physical, chemical and technical properties of the formulation 3 Data on application and further information on the microorganism 3.1 Data on application of the preparation 3.2 Further information on the plant protection product	1. Identity; Biological, physical, chemical and technical properties; Data application and further information; Proposals for classification and labelling; Analytical methods

No.	Column 1 Reference to draft assessment report	Column 2 Comment (restricted to 500 characters, ca.10 lines)	Column 3 Further explanations
(1)	Vol. #, <<data point>>, <<description>>, <<page no.>>	<<MS/notifier>>: <<comment>>	(Please note that embedded or attached files will not be accepted.)

Microorganisms – differences between Connect.EFSA and commenting table

Section 1

Connect.EFSA	Commenting Template
4 Classification and labelling 4.1 Classification and labelling 5 Analytical methods 5.1 Analytical methods for the analysis of the microorganism as manufactured	1. Identity; Biological, physical, chemical and technical properties; Data application and further information; Proposals for classification and labelling; Analytical methods

No.	Column 1 Reference to draft assessment report	Column 2 Comment (restricted to 500 characters, ca.10 lines)	Column 3 Further explanations
(1)	Vol. #, <<data point>>, <<description>>, <<page no.>>	<<MS/notifier>>: <<comment>>	(Please note that embedded or attached files will not be accepted.)

→ Alignment of the template for comments with the section titles displayed in Connect.EFSA to make it easier to accurately assign the comment

Thank you very much for your attention!

Contact

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