



Document Title

**Summary of the fate and behaviour in the environment for
Fosetyl-aluminium WG 80 (800 g/kg)**

Data Requirements

**EU Regulation 1107/2009 & EU Regulation 284/2013
Document MCP**

Section 9: Fate and behaviour in the environment

According to the Guidance Document SANCO/10181/2013 for
preparing dossiers for the approval of a chemical active substance

Date

2016-09-01

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[REDACTED]

Bayer CropScience



M-534262-03-3

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Version history

Date (yyyy-mm-dd)	Data points containing amendments or additions ¹ and brief description	Document identifier and version number
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¹ It is suggested that applicants adopt a similar approach to showing revisions and version history as outlined in SANCO/10180/2013 Chapter 4 "How to revise an Assessment Report"

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CP 9**FATE AND BEHAVIOUR IN THE ENVIRONMENT**

Fosetyl was included in Annex I to Directive 91/414/EEC in 2006 (Directive 2006/64/CE of 18 July 2006, Entry into Force on 1 May 2007). This Supplementary Dossier contains only data which were not submitted at the time of the Annex I inclusion of fosetyl under Directive 91/414/EEC and which were therefore not evaluated during the first EU review. All data which were already submitted by Bayer CropScience (BCS) for the Annex I inclusion under Directive 91/414/EEC are contained in the DAR, its Addenda and are included in the Baseline Dossier provided by BCS. These data are only mentioned in the Supplementary Dossier for the sake of completeness and only general information (e.g. author, reference etc.) is available for these data. In order to facilitate discrimination between new data and data submitted during the Annex I inclusion process under Directive 91/414/EEC, the old data are written in grey typeface. For all new studies, detailed summaries are provided within this Supplementary Dossier. Additional information requested by the RMS France on 2016-07-27 during the evaluation of the Supplementary Dossier is highlighted in green.

Fosetyl is the ISO common name for ethyl hydrogen phosphonate (IUPAC) but the aluminium salt fosetyl-aluminium (fosetyl-Al), a variant of fosetyl, is used in the formulated product.

In original reports study authors may have used different names or codes for metabolites of fosetyl-Al. In this summary, a single name or single code is used for each metabolite. A full list containing structural formula, various names, short forms, codes and occurrences of metabolites is provided as Document N3.

As some pragmatic approach, "phosphonic acid" formed as a major metabolite is reported in this Supplementary Dossier as the free acid for the sake of clarity and unequivocal handling. After application, aluminium tris-O-ethyl phosphonate (i.e. fosetyl-Al) dissociates into the O-ethyl phosphonate and aluminium ions. Any phosphonate formed from O-ethyl phosphonate in the following would never be present in the form of the free acid (i.e. phosphonic acid) under the conditions of the environment (pH 4 to 9). This conclusion is supported by the molecular structure and by the dissociation constant observed (dissociation constant for the first step of deprotonation: pKa = 2.0). Consequently, phosphonates in their fully protonated form are strong acids that spontaneously form salts in contact with soil or natural water with any suitable counter ion present (i.e. sodium, potassium, magnesium, calcium). With the ability to readily form salts in the environment phosphonates are, in terms of their acidic or alkaline character, similar to the salts of phosphoric acid (i.e. phosphates) in their environmental behaviour.

The formulation Fosetyl-aluminium WG 80 (Fosetyl-Al WG 80) is a water dispersible granule (WG) formulation containing 800 g/kg of fosetyl-Al. This formulation is registered throughout Europe on a wide range of crops under trade names such as Allette. Fosetyl-Al WG 80 was already a representative formulation of BCS for the Annex I inclusion of fosetyl under Directive 91/414/EEC.

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80

Use patterns considered in this risk assessment

Table 9-1: Intended application pattern

Crop	Timing of application (range)	Number of applications	Application interval [days]	Maximum label rate (range) [kg prod./ha]	Maximum application rate, individual treatment (range) [kg a.s./ha] Fosetyl-Al
Orchards (Pome fruits)	BBCH 55-85	1-3	7- 10	4.5	3.6

Compounds addressed in this document

In addition to the active substance fosetyl-Al, the degradation product summarised in [Table 9-2](#) was addressed in this document as it was major in environmental fate studies.

Table 9-2: Active substance and degradation products addressed in this document

Compound / Codes	Chemical Structure	Considered for
Fosetyl-aluminium (parent substance)		PEC _{air} PEC _{gw} PEC _{sw} & PEC _{sed}
Phosphonic acid		PEC _{soil} PEC _{gw} PEC _{sw} & PEC _{sed}

Definition of the residue for risk assessment

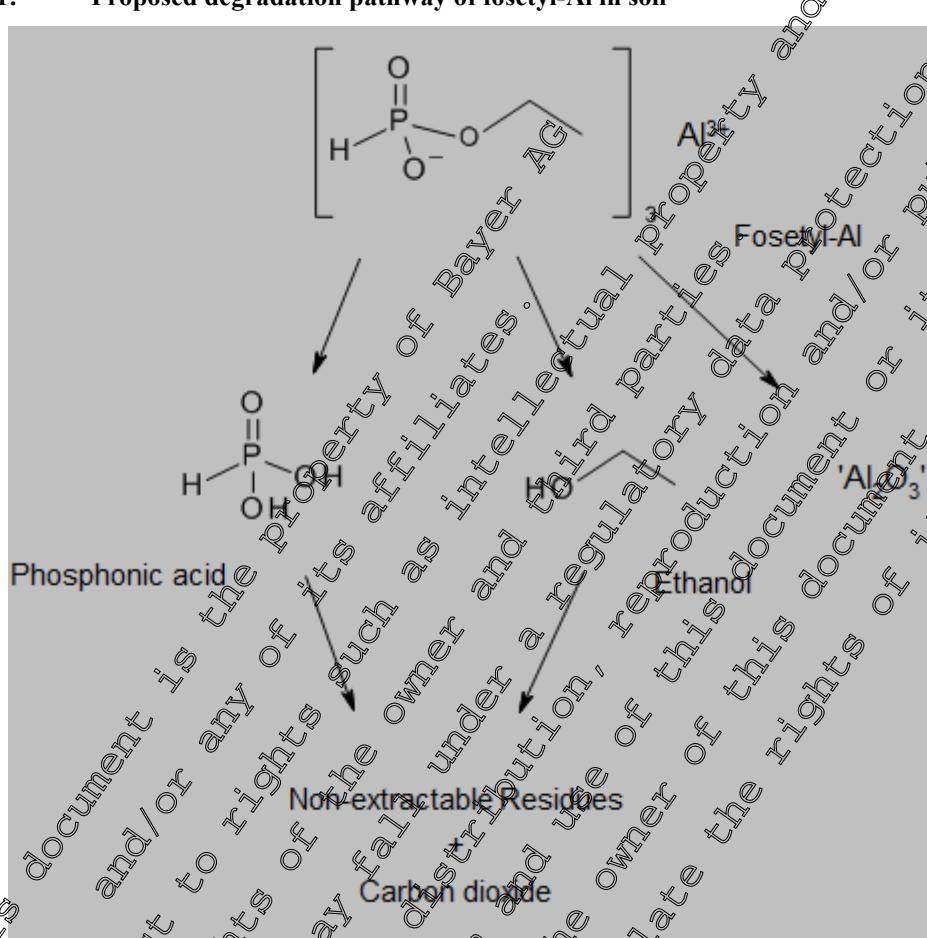
Justification for the residue definition for risk assessment is provided in Document MCA Section 7.4.1.

Table 9-3: Definition of the residue for risk assessment

Compartment	Residue Definition
Soil	Fosetyl-Al, phosphonic acid
Surface water	Fosetyl-Al phosphonic acid
Sediment	Phosphonic acid
Groundwater	Fosetyl-Al phosphonic acid
Air	Fosetyl-Al

The proposed degradation pathway of fosetyl-aluminium (fosetyl-Al) in soil is shown in Figure 9.11.

Figure 9.1- 1: Proposed degradation pathway of fosetyl-Al in soil



For further information on the fate and behaviour in soil please refer to Document MCA, Section 7.1.

CP 9.1.1 Rate of degradation in soil

For information on the rate of degradation in soil please refer to Document MCA, Section 7.1.2.

CP 9.1.1.1 Laboratory studies

For information on laboratory studies please refer to Document MCA, Section 7.1.2.1.

CP 9.1.1.2 Field studies

For information on field studies please refer to Document MCA, Section 7.1.2.2.

CP 9.1.1.2.1 Soil dissipation studies

For information on field dissipation studies please refer to Document MCA, Section 7.1.2.2.1.

CP 9.1.1.2.2 Soil accumulation studies

For information on field accumulation studies please refer to Document MCA, Section 7.1.2.2.2.

CP 9.1.2 Mobility in the soil

For information on mobility studies please refer to Document MCA, Section 7.1.4.

CP 9.1.2.1 Laboratory studies

For information on laboratory studies please refer to Document MCA, Section 7.1.4.1.

CP 9.1.2.2 lysimeter studies

For information on lysimeter studies please refer to Document MCA, Section 7.1.4.2.

CP 9.1.2.3 Field leaching studies

For information on field leaching studies please refer to Document MCA, Section 7.1.4.3.

CP 9.1.3 Estimation of concentrations in soil

New calculations were performed to reflect findings from new studies presented in Document MCA, Section 7, Fate and behavior in the environment. In addition these calculations considered the most recent guidance documents for exposure calculations. Calculations of predicted environmental concentrations in soil (PEC_{soil}) are presented below.

Predicted environmental concentrations in soil (PEC_s)**Endpoints for PEC_{soil}** **Table 9.1.3- 1: Modelling input parameters for fosetyl-aluminium (fosetyl-Al) and its metabolite**

Endpoint	Fosetyl-Al and metabolite	
	Value used for modelling	Source
Fosetyl-Al		
Molar mass [g/mol]	354.14	
DT ₅₀ [days] (worst-case DT ₅₀)	0.1	
Maximum occurrence [%]	100	
Molecular mass correction	1.00	
Phosphonic acid		
Molar mass [g/mol]	146	
DT ₅₀ [days] (worst-case DT ₅₀)	270	
Maximum occurrence [%]	100 (3 equivalents)	
Molecular mass correction	0.6946	

 PEC_{soil} modelling approach

The predicted environmental concentrations in soil (PEC_{soil}) for the active substance fosetyl-aluminium (fosetyl-Al) were calculated based on a simple first tier approach (Microsoft® Excel spreadsheet) assuming even distribution of the compound in the upper 0-5 cm soil layer. A standard soil density of 1.5 g/cm³ was assumed.

Crop interception will reduce the amount of a compound reaching the soil and therefore this has been taken into account depending on the growth stage at application. The interception rates follow the recommendations of the FOCUS groundwater guidance paper (FOCUS 2014) for pome fruits (see Table 9.2.4- 2).

Derivation of kinetic modelling input values for fosetyl-Al and its major degradation product is presented in Document MCA, Section 7.2, a summary of modelling input parameters is given in the report KCP9.1.3/01.

Predicted environmental concentrations in soil (PECs) of fosetyl-Al and its major degradation product

For fosetyl-Al, the major degradation product phosphonic acid was considered.

Report: KCP 9.1.3/02 [REDACTED]; 2015; M-532544-01-1

Title: Fosetyl-Al (FEA) and metabolite: PECsoil EUR - Use in pome fruits and grapes in Europe

Report No.: EnSa-15-0555

Document No.: M-532544-01-1

Guideline(s): EU Commission, 2000, Guidance Document on Persistence in Soil (Working Document), 9188/VI/97 rev.8; FOCUS 1997, Soil persistence models and EU registration; FOCUS, 2014: Generic Guidance for Tier 1 FOCUS Groundwater Assessments, Version 2.2

Guideline deviation(s): none

GLP/GEP: no

Methods and Materials:

The predicted environmental concentrations in soil (PEC_{soil}) of fosetyl-aluminium (fosetyl-Al) and its major soil degradation product phosphonic acid were calculated based on a first tier approach using a Microsoft® Excel spreadsheet.

The use of fosetyl-Al in pome fruits was assessed according to Good Agricultural Practice (GAP) under European cropping conditions. Detailed application data used for simulation of PEC_{soil} were compiled in Table 9.1.3- 2.

Table 9.1.3- 2: Application pattern used for PEC_{soil} calculations of fosetyl-Al

Individual Crop	FOCUS crop used for Interception	Application				Amount reaching the soil per application [g a.s./ha]
		Rate per Season [g a.s./ha]	Interval [days]	Plant Interception [%]	BBCH Stage	
Pome fruits	Apples	3 × 3600	7	60	55-85	3 × 1440.00

Substance Specific Parameters:

PEC_{soil} calculations were based on the DT_{50} of 0.1 days (worst case of laboratory studies) for the parent compound fosetyl-Al. Further compound specific input parameters are summarized below.

Table 9.1.3- 3: Input parameters for PEC_{soil} for fosetyl-Al and its major degradation product

Compound	DT_{50} [days]	Max occurrence in soil [%]	Molar mass [g/mol]	Molar mass corr. factor
Fosetyl-Al	0.0	100	354.14	1
Phosphonic acid	270	100	246	0.6946

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Findings:**

The maximum PEC_{soil} values for fosetyl-Al and its major degradation product are summarised in **Table 9.1.3- 4**. The accumulation potential of fosetyl-Al and its metabolite phosphonic acid after long term use was also assessed. The results are presented in **Table 9.1.3- 5**. Detailed PEC_{soil} and TWA_{soil} values for the individual uses are listed in **Table 9.1.3- 6** and **Table 9.1.3- 7**.

Table 9.1.3- 4: Maximum PEC_{soil} of fosetyl-Al and its degradation product for the uses assessed

Use pattern	Fosetyl-Al	Phosphonic acid
	PEC _{soil} [mg/kg]	
Pome fruits, 3×3600 g a.s./ha	1.920	3.930

Table 9.1.3- 5: PEC_{soil} of fosetyl-Al and its metabolite for the uses assessed, considering accumulation - mixing depth of 5 cm for plateau calculation

Use Pattern	Fosetyl-Al	Phosphonic acid
	PEC _{soil} [mg/kg]	[mg/kg]
Pome fruits 3×3600 g a.s./ha	plateau total	0.001 1.920 2.332 0.462

Table 9.1.3- 6: PEC_{soil} of fosetyl-Al and its degradation product for the use in pome fruits (3×3600 g a.s./ha, 3×60% interception, 7d app. interval)

Substance	Fosetyl-Al	Phosphonic acid
	PEC _{soil} [mg/kg]	
Initial	0	1.920
	1	0.002
	2	<0.001
	4	<0.001
	7	<0.001
	14	<0.001
	21	<0.001
Short-term	28	0.001
	42	0.001
	50	<0.001
	100	<0.001
Long-term		3.890
		3.860
		3.791
		3.724
		3.657
		3.528
		3.457
		3.040

Table 9.1.3- 7: TWA_{soil} of fosetyl-Al and its degradation product for the use in pome fruits (3×3600 g a.s./ha, 3×60% interception, 7d app. interval)

Substance	Fosetyl-Al	Phosphonic acid
	TWA _{soil} [mg/kg]	
Initial	0	-
	1	0.277
Short-term	2	0.138
	4	0.069
	7	0.040
	14	0.020
	21	0.013
	28	0.010
	42	0.007
	50	0.006
Long-term	100	0.003
		3.925
		3.920
		3.910
		3.895
		3.860
		3.826
		3.792
		3.726
		3.688
		3.466

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80

As requested by the RMS France, new PEC_{soil} calculations were performed using the input parameters as provided by ANSES (see Table 9.1.3- 9).

Report:	KCP 9.1.3/03 [REDACTED]; [REDACTED]; 2016; M-563138-01-1
Title:	Fosetyl-Al (FEA) and metabolite: PECsoil EUR - Use in pome fruit and grapes in Europe
Report No.:	EnSa-16-0659 v1
Document No.:	M-563138-01-1
Guideline(s):	none
Guideline deviation(s):	none
GLP/GEP:	no

Methods and Materials:

In the present study, predicted environmental concentrations in soil (PEC_{soil}) of the active substance fosetyl-aluminium (fosetyl-Al) and its major soil metabolite phosphonic acid were calculated based on a first tier approach using a Microsoft® Excel spreadsheet. The use of fosetyl-Al in pome fruit was assessed according to Good Agricultural Practice (GAP) under European cropping conditions. Detailed application data used for simulation of PEC_{soil} were compiled in Table 9.1.3- 8.

Table 9.1.3- 8: Application pattern used for PEC_{soil} calculations of fosetyl-Al

Individual Crop	FOCUS crop used for Interception	Application				Amount reaching the soil per application [g a.s./ha]
		Rate per Season [g a.s./ha]	Interval [days]	Plant Interception [%]	BBC Stage	
Pome fruits	Apples	3 × 3600	7	3 × 60	55-85	3 × 1440.00

On 2016-07-27 the RMS France requested additional PEC calculations during the approval renewal process of the active substance fosetyl-Al. Amalgamated data from three applicants should be used for fosetyl-Al and its metabolite. The input parameters proposed by ANSES are summarised in Table 9.1.3- 9.

Table 9.1.3- 9: List of the main parameters as proposed by RMS for the risk assessment

Parameter	Input		Remarks (Concerning phosphonic acid parameters)
	Fosetyl-Al	Phosphonic acid	
DT ₅₀ soil (days)	0.1	1000	Maximum estimated DT ₅₀ for phosphonic acid was > 1000 days. 1000 days is taken as a worst-case reasonable assumption ^{a)} .
Maximum occurrence in soil (%)		100	

^{a)} [REDACTED], W., 2015; M-532341-01-1 BCS; please refer to Document MCA, Section 7, chapter CA 7.1.2.1.2

Remark notifier: ANSES proposes a value of 1000 days as worst case non-normalised DT₅₀ for calculation of PEC in soil including accumulation. BCS used originally the worst case DT₅₀ of 264 days for the exposure assessment together with a worst case assumption of 100% formation, which is still deemed more appropriate by BCS.

Despite this point, the PEC calculations were carried out with the input parameters proposed by ANSES.

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Findings:**

The maximum PEC_{soil} values for fosetyl-Al and its metabolite phosphonic acid are summarized in Table 9.1.3- 10. The accumulation potential of fosetyl-Al and its metabolite phosphonic acid after long term use was also assessed. The results are presented in Table 9.1.3- 11. Detailed PEC_{soil} and TWA_{soil} values for the individual uses are listed in Table 9.1.3- 12 and Table 9.1.3- 13.

Table 9.1.3- 10: Maximum PEC_{soil} of fosetyl-Al and its metabolite for the uses assessed

Use pattern	Fosetyl-Al	Phosphonic acid
	PEC _{soil} [mg/kg]	
Pome fruits, 3×3600 g a.s./ha	1.920	3.982

Table 9.1.3- 11: PEC_{soil} of fosetyl-Al and its metabolite for the uses assessed, considering accumulation - mixing depth of 5 cm for plateau calculation

Use Pattern	Fosetyl-Al	Phosphonic acid
	PEC _{soil} plateau [mg/kg]	[mg/kg]
Pome fruits 3×3600 g a.s./ha	0.001	13.83
	1.920	17.81

Table 9.1.3- 12: PEC_{soil} of fosetyl-Al and its metabolite for the use in pome fruits (3×3600 g a.s./ha, 3×60% interception, 7 days app. interval)

Substance	Fosetyl-Al	Phosphonic acid
Days after maximum	PEC _{soil} [mg/kg]	
Initial	1.920	3.982
1	0.002	3.979
2	<0.001	3.976
4	<0.001	3.973
7	<0.001	3.962
14	<0.001	3.943
21	<0.001	3.924
28	<0.001	3.905
42	<0.001	3.867
50	<0.001	3.846
100	<0.001	3.715

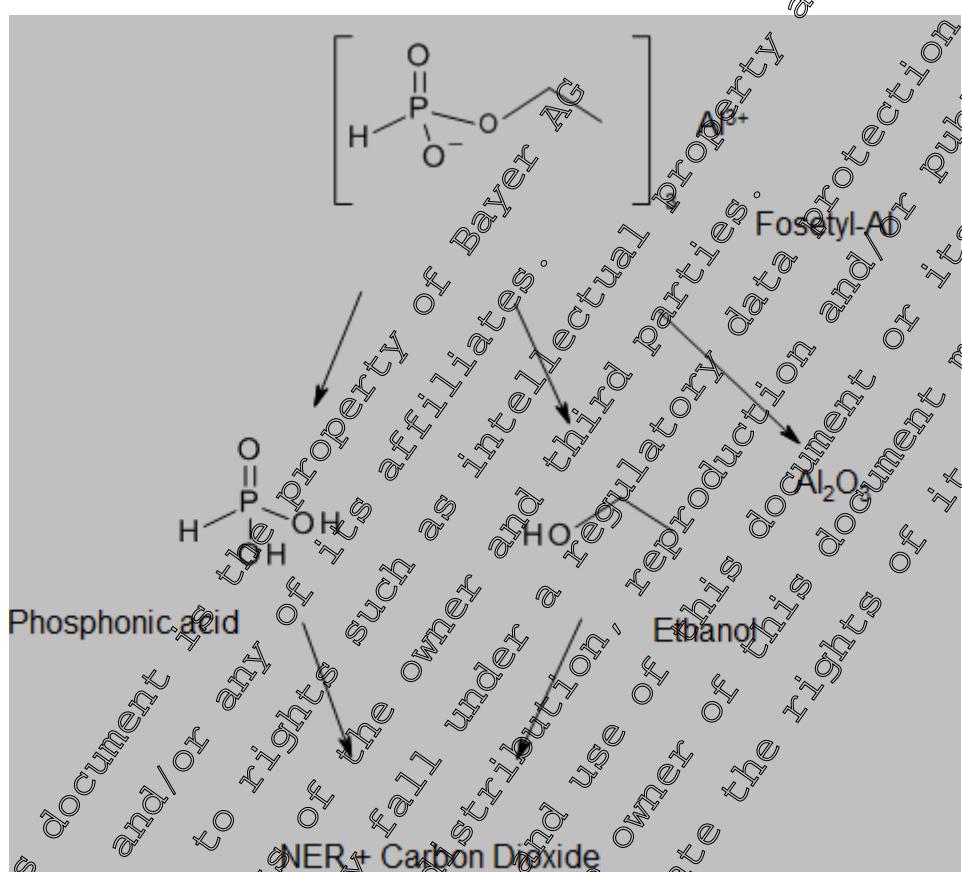
Table 9.1.3- 13: TWA_{soil} of fosetyl-Al and its metabolite for the use in pome fruits (3×3600 g a.s./ha, 3×60% interception, 7 days app. interval)

Substance	Fosetyl-Al	Phosphonic acid
Days after maximum	TWA _{soil} [mg/kg]	
Initial	1	1
1	0.277	3.980
2	0.138	3.979
4	0.069	3.976
7	0.040	3.972
14	0.020	3.962
21	0.013	3.953
28	0.010	3.943
42	0.007	3.924
50	0.006	3.913
100	0.003	3.847

CP 9.2 Fate and behaviour in water and sediment

The proposed degradation pathway of fosetyl-aluminium (fosetyl-Al) in water and sediment is shown in Figure 9.2- 1.

Figure 9.2- 1: Proposed degradation pathway of fosetyl-Al in water and sediment



For further information on the fate and behaviour in water and sediment please refer to Document MCA, Section 7.2.

CP 9.2.1 Aerobic mineralisation in surface water

For information on aerobic mineralisation in surface water studies please refer to Document MCA, Section 7.2.2.

CP 9.2.2 Water/sediment study

For information on water/sediment studies please refer to Document MCA, Section 7.2.2.3.

CP 9.2.3 Irradiated water/sediment study

For information on irradiated water/sediment studies please refer to Document MCA, Section 7.2.2.4.

CP 9.2.4 Estimation of concentrations in groundwater

New calculations were performed, to reflect findings from new studies presented in Document MCP A, Section 7, Fate and behavior in the environment. In addition these calculations consider the most recent guidance documents for exposure calculations.

Calculations of predicted environmental concentrations in groundwater (PEC_{gw}) are presented below.

Endpoints for PEC_{gw}**Table 9.2.4- 1: Modelling input parameters for fosetyl-aluminium (fosetyl-Al) and its metabolite**

Endpoint	Fosetyl-Al and metabolite
	Value used for modelling
Fosetyl-Al	
Molar mass [g/mol]	354.4
Aqueous solubility [mg/L]	110 at 20 °C
Vapour pressure [Pa]	1.0×10^{-7} (25 °C)
DT ₅₀ soil [days]	0.1
K _{oc} [L/kg]	0.0
K _{om} [L/kg]	0.058
1/n	1.0
Phosphonic acid	
Molar mass [g/mol]	82
Aqueous solubility [mg/L]	110 at 20 °C
Vapour pressure [Pa]	1.0×10^{-7} (25 °C)
DT ₅₀ soil [days]	83.8
K _{oc} [L/kg]	0.0
K _f [L/kg]	0.91
1/n	1.0

PEC_{gw} modelling approach

The predicted environmental concentrations in groundwater (PEC_{gw}) for the active substance fosetyl-aluminium (fosetyl-Al) were calculated using the simulation models PEARL, PELMO and MACRO following the recommendations of the FOCUS working group on groundwater scenarios.

The leaching calculations were run over 26 years, as proposed for pesticides which may be applied every year. The simulation length increases to 46 and 66 years for pesticides which are applied only every second and third year, respectively. The first six years are a ‘warm up’ period; only the last 20 years were considered for the assessment of the leaching potential. The 80th percentile of the average annual groundwater concentrations in the percolate at 1 m depth under a treated plantation were evaluated and were taken as the relevant PEC_{gw} values. In respect to the assessment of a potential groundwater contamination this shallow depth reflects a worst case. The effective long-term groundwater concentrations will be even lower due to dilution in the groundwater layer.

According to FOCUS, the calculations were conducted based on mean soil half-lives, referenced to standard temperature and moisture conditions. Crop interception will reduce the amount of a compound reaching the soil and therefore this has been taken into account depending on the growth stage at application. The interception rates follow the FOCUS recommendations (see Table 9.2.4- 2).

Table 9.2.4- 2: FOCUS groundwater crop interception values

Crop	Crop stage Interception [%]			
	BBCH 0-9	BBCH 10-69	BBCH 71-75	BBCH 76-89
Apples	without leaves	flowering	early fruit development	full canopy
	50	60	65	65

Derivation of kinetic modelling input values is presented in Document MCA Section 7.12, a summary of modelling input parameters is given in the report KCP 9.2.4.1/01.

CP 9.2.4.1 Calculation of concentrations in groundwater

Predicted environmental concentrations in groundwater (PEC_{gw}) of fosetyl-aluminium and its major degradation product

For fosetyl-aluminium, the major degradation product phosphonic acid was considered.

Report: KCP 9.2.4.1/03 [REDACTED], 2015, M-532542-01
Title: Fosetyl-Al (FEA) and metabolite PEC_{gw} FOCUS PEARL, PELMO, MACRO EUR - Use in pome fruits and grapes in Europe
Report No.: EnSa 13-0553
Document No.: M-532542-01-1
Guideline(s): EU Commission (2000, Guidance Document on Persistence in Soil (Working Document), 9188/VI/97 rev.8; FOCUS (1997) Soil persistence models and EU registration; FOCUS, 2014: Generic Guidance for Tier 1 FOCUS Groundwater Assessments, Version 2.2
Guideline deviations: none
GLP/GEP: no

Methods and Materials:

Predicted environmental concentrations of the active substance fosetyl-aluminium (fosetyl-Al) and its major soil degradation product in groundwater recharge (PEC_{gw}) were calculated for the use in Europe, using the simulation models FOCUS PEARL 4.4.4 (Leistra et al. 2001), FOCUS PELMO 5.5.3 (Jene 1998; Klein 1995, 1999, 2011) and FOCUS MACRO 5.5.4 (Jarvis, 1994; Jarvis and Larsbo, 2012). PEC_{gw} were evaluated as the 80th percentile of the mean annual leachate concentration at 1 m soil depth. Model parameters and scenarios consisting of weather, soil, and crop data were used as proposed by FOCUS (2009, 2014).

The use of fosetyl-Al in pome fruits was assessed according to Good Agricultural Practice (GAP) under European cropping conditions. Detailed application data used for simulation of PEC_{gw} were compiled in Table 9.2.4.1/1.

Table 9.2.4.1- 1 Application pattern used for PEC_{gw} calculations of fosetyl-Al

Individual Crop	FOCUS crop used for Interception	Application				Amount reaching the soil per application [g a.s./ha]
		Rate per Season [g a.s./ha]	Interval [days]	Plant Interception [%]	BBCH Stage	
Pome fruits	Apples	3 × 3600	7	3 × 60	55-85	3 × 1440.00

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Further input parameters for PEC_{gw} modelling of fosetyl-Al and its degradation product are summarised in [Table 9.2.4.1- 2](#).

Table 9.2.4.1- 2: Substance specific and model related input parameter for PEC_{gw} calculation of fosetyl-Al and its degradation product

Parameter	Unit	Fosetyl-Al	Phosphoric acid
Common			
Molar Mass	[g/mol]	354.1	82.0
Solubility	[mg/L]	10000	110000
Vapour Pressure	[Pa]	1.00E-07	1.00E-07
Freundlich Exponent		1.000	1.000
Plant Uptake Factor		0.0	0.0
Walker Exponent		0.7	0.7
PEARL Parameters		FEA	H ₃ PO ₃
Substance Code		0.1	83.8
DT ₅₀	[days]	5.4	65.4
Molar Activ. Energy	[kJ/mol]	0.1	39.1
K _{om}	[mL/g]	0.1	0.00827
K _f	[mL/g]	6.931	2.58
PELMO Parameters		2.5	-
Substance Code		0.1	-
Rate Constant	[1/day]	6.931	-
Q ₁₀		2.5	-
K _{oc}	[mL/g]	0.1	-
Degradation fraction from → to (FOCUS PEARL & MACRO)		3 FEA → H ₃ PO ₃	-
Degradation rate from → to (FOCUS PELMO)		6.9314720 Active Substance → X1 0.0082710 Al → <BR/CO ₂ → X1	-

Application dates for the simulation runs were defined following the crop event dates of the respective crop and scenario (see [Table 9.2.4.1- 3](#)) as given by FOCUS (2009). Crop interception was taken into account according to the BBCH growth stage, as recommended by FOCUS (2014).

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Fosetyl-aluminium WG 80

Table 9.2.4.1- 3: First application dates and related information for fosetyl-Al as used for the simulation runs; offset is relevant only for relative application dates, two sets of data are provided for crops with two seasons

Individual crop	Pome fruits
Repeat Interval for App. Events	Every Year
Application Technique	Spray
Absolute / Relative to	Absolute
Scenario	1 st App. Date (Julian day) Offset
[REDACTED]	21 May (141)
[REDACTED]	08 May (128)
[REDACTED]	23 May (143)
[REDACTED]	08 May (128)
[REDACTED]	02 Jun (153)
[REDACTED]	21 May (141)
[REDACTED]	13 Jun (164)
[REDACTED]	19 May (149)
[REDACTED]	13 Jun (164)

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Findings:

PEC_{gw} were evaluated as the 80th percentile of the mean annual leachate concentration at 1 m soil depth. PEC_{gw} values for fosetyl-Al and its metabolite are given in the following tables.

Pome fruits, 3×3600 g a.s./ha

Table 9.2.4.1- 4: FOCUS PEARL PEC_{gw} results of fosetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3×60% interception, 7 d app. interval)

Table 9.2.4.1- 5: FOCUS PELMO PEC_{gw} results of fosetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3×60% interception, 7 d app. interval)

Scenario	Fosetyl-Al	Phosphonic acid
off the market	<0.001	<0.001
own fallow	<0.001	<0.001
own fallow and disuse	<0.001	<0.001
own fallow and use	<0.001	<0.001
own fallow and use and disuse	<0.001	<0.001
own fallow and use and disuse and off the market	<0.001	<0.001
own fallow and use and disuse and off the market and own fallow	<0.001	<0.001
own fallow and use and disuse and off the market and own fallow and off the market	<0.001	<0.001
own fallow and use and disuse and off the market and own fallow and off the market and own fallow	<0.001	<0.001

Table 9.2.4.1- 6: FOCUS MACRO PEC_{gv} results of Osoetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3760% interception, 7 d app. interval)

Scenario	Eosetyl Al	Phosphonic acid
	<0.001	<0.001

~~Conclusion:~~

There are no concerns for groundwater from the active substance fosetyl-Al and its metabolite in accordance with the use pattern for the current formulation.

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Fosetyl-aluminium WG 80

As requested by the RMS France, new PEC_{gw} calculations were performed using the input parameters as provided by ANSES (see Table 9.2.4.1- 8).

Report:	KCP 9.2.4.1/04 [REDACTED]; 2016; M-563145-01-1
Title:	Fosetyl-Al (FEA) and metabolite: PEC _{gw} FOCUS PEARL, PELMO, MACRO-EUR – Use in pome fruit and grapes in Europe
Report No.:	EnSa-16-0660 v1
Document No.:	M-563145-01-1
Guideline(s):	none
Guideline deviation(s):	none
GLP/GEP:	no

Methods and Materials:

Predicted environmental concentrations of the active substance fosetyl-aluminium (fosetyl-Al) and its major soil metabolite phosphonic acid in groundwater recharge (PEC_{gw}) were calculated for the use in Europe, using the simulation models FOCUS PEARL 4.4.4 (Leistra et al. 2001), FOCUS PELMO 5.5.3 (Jene 1998; Klein 1995, 1999, 2010), and FOCUS MACRO 5.5.4 (Jarvis 1994; Jarvis and Larsbo 2012). PEC_{gw} were evaluated as the 80th percentile of the mean annual leachate concentration at 1 m soil depth. Model parameters and scenarios consisting of weather, soil, and crop data were used as proposed by FOCUS (2009, 2014).

The use of fosetyl-Al in pome fruits was assessed according to Good Agricultural Practice (GAP) under European cropping conditions. Detailed application data used for simulation of PEC_{gw} were compiled in Table 9.2.4.1- 7.

Table 9.2.4.1- 7: Application pattern used for PEC_{gw} calculations of Fosetyl-Al

Individual Crop	FOCUS crop used for Interception	Application				Amount reaching the soil per application [g a.s./ha]
		Rate per Season [g a.s./ha]	Interval [days]	Plant Interception [%]	BBCH Stage	
Pome fruits	Apples	3 × 3600	7	30-60	55-85	3 × 1440.00

On 2016-07-27 the RMS France requested additional PEC calculations during the approval renewal process of the active substance fosetyl-Al. Amalgamated data from three applicants should be used for fosetyl-Al and its metabolite. The input parameters proposed by ANSES are summarised in Table 9.2.4.1- 8.

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.4.1- 8:** List of the main parameters as proposed by RMS for the risk assessment

Parameter	Input		(Concerning phosphonic acid parameters)
	Fosetyl-Al	Phosphonic acid	
DT ₅₀ soil (days)	0.1	133.7	Geometric mean of all acceptable values ^{a),b),c)}
Formation fraction in soil (-)	-	1	
K _{foc} (L/kg)	0.1	1	
K _f (L/kg)	-	15.9 ^{b)}	Geometric mean of all acceptable values derived from batch studies ^{a),c)}
1/n	1	0.69 ^{b)}	Arithmetic mean of all acceptable values derived from batch studies ^{d),e)}
Crop uptake factor	0	0	Conservative assumption

^{a)} [REDACTED]; 2015; M-532341-01-1; BCS; please refer to Document MCA, Section 7, chapter CA 7.1.2.1.2^{b)} [REDACTED]; 1999; M-184316-01-1; BCS; please refer to Document MCA, Section 7, chapter CA 7.1.2.1.2^{c)} [REDACTED]; 2015; S15-00506; Fosetyl-Al Task Force^{d)} [REDACTED]; 2008; B30701; ISK Biosciences Europe SA^{e)} [REDACTED]; 2007; GAB-014/7-13; Fosetyl-Al Task Force^{f)} In PEC_{gw} calculations, K_f and Fretschlich exponent should be implemented in the different soil horizons by manually editing the input files.

Remark notifier: ANSES proposes to use 133.7 days as geometric mean DT₅₀ of all acceptable values for calculation of PEC_{gw} in groundwater. The value of 133.7 days is presumably based on using 1000 days for the [REDACTED] soil based on the slow phase of the DFOP model ([REDACTED]; 2015; M-532341-01-1), and 332 days for the LUCA soil submitted by the FAIRITE task force ([REDACTED]; 2015; S15-00506) based on the HS model. Since both soils show a similar pattern, the HS model is more appropriate for [REDACTED] soil in this light, instead of a very conservative estimation of 1000 days based on only the few last data points, which was deemed unreliable by BCS. Despite this point, the PEC calculations were carried out with the input parameters proposed by ANSES.

Further input parameters for PEC_{gw} modelling of fosetyl-Al and its metabolite are summarised in Table 9.2.4.1-9.

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Fosetyl-aluminium WG 80

Table 9.2.4.1- 9: Compound input parameters for fosetyl-Al and its degradation product

Parameter	Unit	Fosetyl-Al	Phosphonic acid
Common			
Molar mass	(g/mol)	354.14	246.0 ^{a)}
Solubility at temp.	(mg/L)	110000	110000
Vapour pressure at temp.	(Pa)	1.00E-07	0.00E-07
Freundlich exponent	(°C)	20	20
Plant uptake factor	(-)	1.000	0.690
Walker exponent	(-)	0.0	0.0
PEARL parameters	(-)	0.7	0.7
Substance code	(-)	FEA	H3PO3
DT ₅₀	(days)	0.1	132.7
Molar activ. energy	(kJ/mol)	65.4	65.4
K _{om}	(mL/g)	0.058	15.9
K _f	(mL/g)	0.058	0.49
PELMO parameters	(-)	AS	A1
Substance code	(-)	6.93147	0.00543
Rate constant	(1/day)	2.58	2.58
Q ₁₀	(m ² /g)	0.1	0.0948
K _{oc}	(-)		
MACRO parameters			
Substance code	(-)	FEA	H3PO3
Exponent moisture	(-)	0.42	0.49
Exponent temperature	(1/K)	0.0948	0.0948
^{a)} 3 × 82.0 g/mol, one mole of fosetyl-Al is forming 3 moles of phosphonic acid			
Degradation fraction from → to (-) (FOCUS PEARL)	FEA → H ₃ PO ₃ : 1		
Degradation rate from → to (1/day) (FOCUS PELMO)	Active Substance → A1: 6.9314718 A1 → BR/CC: 0.00543843		
Conversion factor from → to (-) (FOCUS MACRO)	FEA → H ₃ PO ₃ : 0.6946405		
^{a)} Calculated as ln(2) / DT ₅₀ × formation fraction			
^{b)} Calculated as molar mass / molar mass predecessor × formation fraction			

Application dates for the simulation runs were defined following the crop event dates of the respective crop and scenario (see Table 9.2.4.1- 10) as given by FOCUS (2009). Crop interception was taken into account according to the BBCI growth stage, as recommended by FOCUS (2014).

Table 9.2.4.1- 10: First application dates and related information for fosetyl-Al as used for the simulation runs; offset is relevant only for relative application dates, two sets of data are provided for crops with two seasons

Individual crop	Pome fruits
Repeat Interval for App. Events	Every Year
Application Technique	Spray
Absolute / Relative to	Absolute
Scenario	1st App. Date (Julian day) Offset
	[REDACTED]
	21 May (141)
	08 May (128)
	23 May (143)
	08 May (128)
	02 Jun (153)
	21 May (141)
	13 Jun (164)
	19 May (159)
	13 Jun (164)

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Findings:

Overview of the PEC_{gw} values obtained with individual FOCUS models is given in Table 9.2.4.1-11 (PEARL), Table 9.2.4.1-12 (PELMO), and Table 9.2.4.1-13 (MACRO).

Table 9.2.4.1- 11: FOCUS PEARL PEC_{gw} results of fosetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3×60% interception, 7 days app. interval)

Table 9.2.4.1- 12: FOCUS PELMO PEC_{gw} results of fosetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3×60% interception, 7 days app. interval)

Treatment	Survival Probability (approx.)
Scenario (Control)	0.00
Fosetyl-Al	0.001
Phosphonic acid	<0.001

Table 9.2.4.1- 13: FOCUS MACROPEC_{gw} results of fosetyl-Al and its metabolite in µg/L (Pome fruits, 3×3600 g a.s./ha, 3×60% interception, 7 days app. interval)

Scenario	Fosetyl-Al	Phosphonic acid
	<0.001	<0.001

CP 9.2.4.2

Additional field tests

No additional field studies were performed due to low PEC_{gw} values calculated (see Section CP 9.2.4.1).

CP 9.2.5 Estimation of concentrations in surface water and sediment

New calculations were performed, to reflect findings from new studies presented in Document MCA, Section 7, Fate and behavior in the environment. In addition these calculations consider the most recent guidance documents for exposure calculations.

Calculations of predicted environmental concentrations in surface water (PEC_{sw}) and sediment (PEC_{sed}) are presented below.

Endpoints for PEC_{sw}**Table 9.2.5- 1: Modelling input parameters for fosetyl-aluminium (fosetyl-Al) and its metabolite**

Endpoint	Fosetyl-Al and metabolite Value used for modelling
Fosetyl-Al	
Molecular weight [g/mol]	354.4
Aqueous solubility [g/L]	110 at 20 °C
Vapour pressure [Pa]	1.0×10^{-7} (25 °C)
K _{oc} [L/kg]	0.1
K _{om} [L/kg]	0.058
1/n	0
DT ₅₀ soil [days]	0.1
DT ₅₀ total system [days]	3.0
DT ₅₀ water [days]	3.0
DT ₅₀ sediment [days]	1000 (default)
Maximum occurrence in water/sediment	100%
Phosphonic acid	
Molecular weight [g/mol]	246 (Step 1, 82 (Step 3, 4))
Aqueous solubility [g/L]	110 at 20 °C
Vapour pressure [Pa]	1.0×10^{-7} (25 °C)
DT ₅₀ soil [days]	83.8
K _d [L/kg]	39.1
K _{oc} [L/kg]	782 (assumption: 5% OC in soil) ^{a)}
K _{om} [L/kg]	434 (assumption: 9% OM in soil) ^{b)}
1/n	1.0
Maximum occurrence in soil	100%
DT ₅₀ total system [days]	102
DT ₅₀ water [days]	102
DT ₅₀ sediment [days]	102
Maximum occurrence in water/sediment	100%

^{a)} Using the K_d parameter instead of K_{oc} requires the following changes in the FOCUS surface water calculations: a pseudo-K_{oc} of 782 mL/g has been derived from the effective K_d of 39.1 mL/g, assuming an OC content of 5% (FOCUS Step 2).

^{b)} Using the K_d parameter instead of K_{oc} requires the following changes in the FOCUS surface water calculations: A pseudo-K_{om} of 489 L/kg has been derived from the effective K_d of 44 L/kg, assuming an OM content of 9% (FOCUS TOESWA).

PEC_{sw} modelling approach**Calculation of PEC values for the active substance according to FOCUS**

FOCUS_{sw} is a four step tiered approach:

Step 1: All inputs are considered as a single loading to the water body and a worst-case PEC_{sw} and PEC_{sed} is calculated (most conservative step).

Step 2: Individual loadings into the water body from different entry routes according to the number of applications are considered. Scenarios are also considered for Northern and Southern Europe separately but no specific crop scenarios are defined.

Step 3: An exposure assessment using realistic worst-case scenarios is performed. The scenarios are representative for agricultural conditions in Europe and consider weather, soil, crop and different water-bodies. Simulations use the models PRZM, MACRO and TOXSWA.

Step 4: PEC values are refined by considering mitigation measures according to the FOCUS Landscape and Mitigation Factors, i.e. drift reduction or vegetated filter strips, which intercept runoff water and eroded sediment prior to entry into surface water.

Derivation of kinetic modelling input values is presented in Document MCA, Section 7.2, a summary of modelling input parameters is given in the report KCP 9.2.5/01.

Predicted environmental concentrations in surface water (PEC_{sw}) and in sediment (PEC_{sed}) of fosetyl-aluminium and its major degradation product

For fosetyl-aluminium, the major degradation product phosphonic acid was considered.

Report:

KCP 9.2.5/02 [REDACTED]; 2015; M-532543-01-1
Title: Fosetyl-Al (EA) and metabolite: PEC_{sw, sed} FOCUS EUR - Use in pome fruits,

pome fruits, grapes (early), grapes (late), grapes (early) and grapes (late) in Europe

Report No.: EnSa-15-0554

Document No.: M-532543-01

Guideline(s): FOCUS 2007, SANCO/10422/2007 Rev. 2.0; FOCUS 2015, Generic guidance for
FOCUS surface water Scenarios version 1.4, May 2015

Guideline deviation(s): none

GLP/GEP: no

Methods and Materials:

Predicted environmental concentrations of the active substance fosetyl-aluminium (fosetyl-Al) and its metabolite phosphonic acid in surface water (PEC_{sw}) and sediment (PEC_{sed}) were calculated for the use in Europe, employing the tiered FOCUS Surface Water (SW) approach (FOCUS 2001, 2015). All relevant entry routes of a compound into surface water (principally a combination of spray drift and runoff/erosion or drain flow) were considered in these calculations.

The use of fosetyl-Al in pome fruits was assessed according to the Good Agricultural Practice (GAP) in Europe. Detailed application parameters are presented in Table 9.2.5- 2.

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 2:** General and FOCUS-specific data on the use pattern of fosetyl-Al in Europe (for FOCUS Step 1&2)

Individual Crop	FOCUS crop used for interception	Application				
		Rate per season [g a.s./ha]	BBCH stage	Interval [days]	Plant Interception [%]	Season
Pome fruits	pome / stone fruit, late applns (fruit crops / late)	3 × 3600	55-85	10	full canopy (65%)	Mar-May

For fosetyl-Al and its metabolite phosphonic acid, FOCUS Step 3 and Step 4 values were calculated in addition to FOCUS Step 1 and Step 2 values.

Compound specific input data are summarised below for (see Table 9.2.5-3).

Table 9.2.5- 3: Substance parameters used for fosetyl-Al and its metabolite

Parameter	Unit	Parent	Metabolite
Substance		Fosetyl-Al	Phosphonic Acid
Company code		LS 74783	AE 0540099
SWASH code		IOA	H3PO3
General			
Molar mass	g/mol	354.14	82
Water solubility (temp.)	mg/L	110000 (20 °C)	110000 (20 °C)
Vapour pressure (temp.)	Pa	1E-07 (25 °C)	1E-07 (25 °C)
Crop processes			
Coefficient for uptake by plant (FSCF)	-	0	50
Wash-off factor	1/m	50	50
Sorption			
K _{OC}	mL/g	0.1	748.22
K _{OM}	mL/g	0.06	434
Freundlich exponent (n)	-	1	1
Transformation			
DT ₅₀ in soil temperature	days	0.1	83.8
PF formation fraction in soil	log(cm)	20	20
DT ₅₀ in water temperature	days	3	2
PF formation fraction in water	log(cm)	20	3
DT ₅₀ in sediment temperature	days	1000	102
PF formation fraction in sediment	log(cm)	20	20
DT ₅₀ on canopy	days	10	3
			10
Exponent for the effect of moisture			
PRZM and TOXSWA (Walker exp.)	-	0.7	0.7
MACRO (calibrated value)	-	0.49	0.49
Effect of temperature			
TOXSWA (molar activation energy)	kJ/mol	65.4	65.4
MACRO (effect of temperature) (Q ₁₀)	1/K	0.0948	0.0948
PRZM	-	2.58	2.58

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Fosetyl-aluminium WG 80

In FOCUS Step 3, the application date for each scenario is determined by the Pesticide Application Timer (PAT), which is part of the FOCUS SW Scenarios. The user may only define an application time window. The actual application date is then set by the PAT in such a way that there are at least 10 mm of rainfall in the first 10 days after application, and at the same time less than 2 mm of rain per day in a five day period around the date of application. If no such date can be found within the application time window, the above rules are step-wise relaxed. Information on application dates can be found in [Table 9.2.5- 4.](#)

Table 9.2.5- 4: Application dates of fosetyl-Al for the FOCUS Step 3 calculations for the use in pome fruits

PMT Name	PMT00 DGR I / PMT I				
DGR / PMT Number	Pome/Stone Fruit Late Applns (fruit crops / late)				
Parameter	33.6 kg a.s./ha 7d int (3.6/0 kg a.s./ha)				
FOCUS model crop (crop group)	Pome/Stone Fruit Late Applns (fruit crops / late)				
Use pattern (single/seasonal appln. rate)	33.6 kg a.s./ha 7d int (3.6/0 kg a.s./ha)				
Appl. Method (Run off CAM, depth inc.)	Air Blast (2 - appln foliar linear, 4 cm)				
PAT start date (relative to crop event or absolute)	absolute				
PAT window range	74 days / 141 days, scenario specific (min = 74 days)				
Drainage Scenarios	PAT Start, Interval (Julian Day)	Application Date	Runoff Scenarios	PAT Start, Interval (Julian Day)	Application Date
D3 Ditch	08-May, 141 (128)	19 May 21 May 21 Jun	R1 Pond/Stream	08-May, 141 (128)	09 May 13 Jun 05 Jul
D4 Pond/Stream	23-Jun, 110 (174)	04 Jul 27 Aug 10 Sep	R2 Stream	08-Jul, 74 (189)	31 Jul 07 Aug 14 Aug
D5 Pond/Stream	21-May, 120 (141)	27 May 09 Jun 19 Jul	R3 Stream	21-May, 124 (141)	01 Jun 16 Jun 30 Jun
			R4 Stream	19-May, 126 (139)	27 May 12 Jun 25 Jun

Findings:**FOCUS Step 1 and 2:**

The maximum PEC values for FOCUS Step 1 and 2 are given in the tables below for fosetyl-Al and its major degradation product.

Table 9.2.5- 5: Summary of the maximum PEC_{sw} and PEC_{sed} values fosetyl-Al (FOCUS Steps 1-2)

Usage	Scenario	Fosetyl-Al (FEA)					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
pome fruits	DGR I / PMT I	Step 1	4166	3.600	2060	2.026	852.6
		Step 2	162.5	0.087	81.41	0.050	33.59
Pome / stone fruit, late applns	N-EU Multi	163.5	0.087	81.41	0.050	33.59	0.022
3×3600g a.s./ha, 7d int.	S-EU Multi	188.7	0.100	93.93	0.057	38.75	0.025
full canopy	N-EU Single	188.7	0.100	93.93	0.057	38.75	0.025
Spring (Mar. - May)	S-EU Single						

Table 9.2.5- 6: Summary of the maximum PEC_{sw} and PEC_{sed} values phosphonic acid (FOCUS Steps 1-2)

Usage	Scenario	Phosphonic acid					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
pome fruits	DGR I / PMT I	Step 1	2842	20515	2594	20064	2466
		Step 2	229.2	1581	200.6	1544	190.3
Pome / stone fruit, late applns	N-EU Multi	307.6	2189	277.1	2138	263.3	1473
3×3600g a.s./ha, 7d int.	S-EU Multi	1311	697.8	90.11	683.4	86.18	652.1
full canopy	N-EU Single	1311	4.4	103.8	893.0	108.0	852.2
Spring (Mar. - May)	S-EU Single						

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**FOCUS Step 3 and 4:**

The maximum PEC values for FOCUS Step 3 and 4 are given in the tables below for fosetyl-Al and its metabolite phosphonic acid considering the application in pome fruits.

Single and multiple application PEC_{sw} values are presented for all relevant scenarios in Step 3 and 4. PEC_{sed} values are only presented for FOCUS Step 3. For other PEC values please refer to the report.

Table 9.2.5- 7: PEC_{sw} and PEC_{sed} values of fosetyl-Al in pome fruits (3x3600 g/ha – 7 day intervals) for all calculated scenarios according to FOCUS SW Step 3

Scenario	Entry route	Fosetyl-Al					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Multiple applications.	D3 (Ditch)	S	93.90	0.8890	19.810	4.9460	0.080
	D4 (Pond)	S	4.9500	0.9342	3.3340	0.9138	2.3010
	D4 (Stream)	S	94.640	3.1780	3.6060	0.7967	1.2020
	D5 (Pond)	S	4.9440	0.8517	4.9990	0.8222	2.3000
	D5 (Stream)	S	102.30	4.3700	5.4640	1.5030	2.6090
	R1 (Pond)	S	4.4280	0.7465	2.9820	0.2156	1.6640
	R1 (Stream)	S	75.520	2.3050	2.1370	0.5647	0.7183
	R2 (Stream)	S	97.2000	2.6120	0.4680	0.5256	1.1670
	R3 (Stream)	S	102.20	4.4120	5.2620	1.5780	3.5080
	R4 (Stream)	S	72.510	2.3740	2.4170	0.6249	1.4220
Single application.	D3 (Ditch)	S	92.10	8.2860	22.830	4.7610	7.6190
	D4 (Pond)	S	5.9290	0.6522	3.4020	0.6279	1.5670
	D4 (Stream)	S	132.60	4.4530	5.0520	1.1660	1.6840
	R1 (Pond)	S	5.9300	0.7446	3.8340	0.7206	1.8810
	R1 (Stream)	S	143.20	5.5600	7.120	1.6470	2.5050
	R2 (Stream)	S	5.9250	0.8144	4.1040	0.7996	2.2900
	R3 (Stream)	S	99.710	2.3460	1.8400	0.4092	0.6199
	R4 (Stream)	S	136.20	2.8900	2.0570	0.4571	0.6856
	R3 (Stream)	S	143.20	5.4640	7.3730	1.6160	2.4580
	R4 (Stream)	S	99.320	2.7750	1.6850	0.3753	0.5617

In bold: highest PEC_{sw} value

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 8:** PEC_{sw} and PEC_{sed} values of phosphonic acid in pome fruits (3x3600 g fosetyl-Al/ha – 7 day intervals) for all calculated scenarios according to FOCUS SW Step 3

Scenario		Phosphonic acid					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Multiple applications.	D3 (Ditch)	8.8450	7.530	2.9510	5.3680	0.1490	3.6100
	D4 (Pond)	5.4980	26.230	5.4800	26.190	5.3930	26.080
	D4 (Stream)	5.6110	1.1870	0.5726	0.8631	0.2063	0.5961
	D5 (Pond)	5.8410	25.360	5.8190	25.360	5.7710	25.310
	D5 (Stream)	8.970	2.5190	0.5585	1.3200	0.3433	0.9981
	R1 (Pond)	5.4050	20.380	5.3760	20.370	5.1750	20.290
	R1 (Stream)	0.3720	4.8960	0.9340	2.7470	0.3533	2.0320
	R2 (Stream)	8.4230	6.3800	0.1700	3.7720	0.201	2.9480
	R3 (Stream)	10.240	2.8990	0.6183	1.0110	0.4123	1.1300
	R4 (Stream)	11.720	10.160	2.4740	7.2000	1.5770	6.040
Single application.	D3 (Ditch)	8.8060	5.2670	2.2870	3.3830	0.7687	2.0530
	D4 (Pond)	3.1720	14.90	3.1590	11.190	0.720	11.180
	D4 (Stream)	7.8610	1.3980	0.3422	0.6467	0.1142	0.3155
	D5 (Pond)	3.4490	12.550	3.3390	2.5500	3.2680	12.530
	D5 (Stream)	11.6400	2.8900	0.8944	1.3550	0.2464	0.8708
	R1 (Pond)	2.8140	9.9670	2.8050	9.9620	2.7420	9.9270
	R1 (Stream)	4.6050	2.1120	0.4044	1.2020	0.1715	0.8728
	R2 (Stream)	6.4360	1.8740	0.3419	1.1120	0.1520	0.8688
	R3 (Stream)	14.350	3.2750	0.8651	1.3760	0.2888	0.7951
	R4 (Stream)	5.7100	21.830	0.6256	1.6110	0.3799	1.4610

In bold: highest PEC_{sw} value

FOCUS Step 4

FOCUS Step 4 calculations considering different buffer zones in combination with mitigation by drift reducing nozzles (where applicable) were conducted based on the Step 3 results. In the following a summary of PEC values resulting from single and multiple applications for relevant crops are given for fosetyl-Al and phosphonic acid.

Table 9.2.5- 9: Summary of FOCUS Step 4 PEC_{sw} values of fosetyl-Al (3×3.6 kg a.s./ha, 7d int.)
Entries marked with * result from single applications. Pome/stone fruit, late
applications

Buffer Width & Type	Scenario	Fosetyl-Al PEC _{sw} [µg/L]					
		Nozzle Reduction					
		0%	50%	75%	90%		
5m Spray drift	D3 (Ditch)	S 89.130*	S 44.570*	S 22.280*	S 8.9130*		
	D4 (Pond)	S 6.7810*	S 3.3900*	S 1.6950*	S 0.6780*		
	D4 (Stream)	S 103.50*	S 51.700*	S 25.870*	S 10.350*		
	D5 (Pond)	S 66.7820*	S 33.910*	S 16.966*	S 6.6782*		
	D5 (Stream)	S 111.80*	S 55.890*	S 27.930*	S 11.180*		
	R1 (Pond)	S 6.7060*	S 3.3880*	S 1.6940*	S 0.6776*		
	R1 (Stream)	S 77.830*	S 38.910*	S 19.460*	S 7.7830*		
	R2 (Stream)	S 106.30*	S 52.150*	S 26.580*	S 10.630*		
	R3 (Stream)	S 111.80*	S 55.890*	S 27.950*	S 11.180*		
10m Spray drift & Runoff	R4 (Stream)	S 77.520*	S 38.760*	S 19.380*	S 7.7520*		
	D3 (Ditch)	S 39.830*	S 19.920*	S 9.9580*	S 3.9830*		
	D4 (Pond)	S 3.7610*	S 1.8800*	S 0.9440*	S 0.3761*		
	D4 (Stream)	S 46.250*	S 23.120*	S 11.560*	S 4.6250*		
	D5 (Pond)	S 30.620*	S 1.8810*	S 0.9404*	S 0.3762*		
	D5 (Stream)	S 49.950*	S 24.970*	S 12.490*	S 4.9950*		
	R1 (Pond)	S 3.7580*	S 1.8790*	S 0.9395*	S 0.3758*		
	R1 (Stream)	S 34.780*	S 17.390*	S 8.6940*	S 3.4780*		
	R2 (Stream)	S 47.500*	S 23.70*	S 11.880*	S 4.7500*		
15m Spray drift & Runoff	R3 (Stream)	S 49.950*	S 24.980*	S 12.490*	S 4.9950*		
	R4 (Stream)	S 34.640*	S 17.320*	S 8.6600*	S 3.4640*		
	D3 (Ditch)	S 20.110*	S 10.060*	S 5.0280*	S 2.0110*		
	D4 (Pond)	S 2.030*	S 1.2040*	S 0.6007*	S 0.2403*		
	D4 (Stream)	S 23.350*	S 11.680*	S 5.8380*	S 2.3350*		
	D5 (Pond)	S 2.4030*	S 1.2020*	S 0.6008*	S 0.2403*		
	D5 (Stream)	S 25.220*	S 12.610*	S 6.3050*	S 2.5220*		
	R1 (Pond)	S 2.4010*	S 1.2010*	S 0.6003*	S 0.2401*		
	R1 (Stream)	S 27.560*	S 8.7800*	S 4.3900*	S 1.7560*		
20m Spray drift & Runoff	R2 (Stream)	S 23.980*	S 11.990*	S 5.9960*	S 2.3980*		
	R3 (Stream)	S 25.220*	S 12.610*	S 6.3050*	S 2.5220*		
	R4 (Stream)	S 27.490*	S 8.7450*	S 4.3730*	S 1.7490*		

S, R and D denote main entry route via spray drift, runoff or drainage, respectively

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80Table 9.2.5- 10: Summary of FOCUS Step 4 PEC_{sed} values of fosetyl-Al (3×3.6 kg a.s./ha, 7d int.); Entries marked with * result from single applications. Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Fosetyl-Al PEC _{sed} [µg/kg]				Nozzle Reduction and drift reduction before runoff	Runoff regime and soil texture before runoff		
		0%		50%					
		10%	50%	15%	90%				
5m Spray drift	D3 (Ditch)	5.5930*	0.7960*	1.3980*	0.5593*	Nozzle reduction and drift reduction before runoff	Runoff regime and soil texture before runoff		
	D4 (Pond)	1.0680	0.5341	0.2671	0.1068*				
	D4 (Stream)	3.4750*	1.7380*	0.8688*	0.3475*				
	D5 (Pond)	0.9739	0.4869	0.2435	0.0974*				
	D5 (Stream)	4.3400*	2.1700*	1.0850*	0.4340*				
	R1 (Pond)	0.9313*	0.4637*	0.2328*	0.0931*				
	R1 (Stream)	1.8310*	0.9457*	0.4578*	0.1831*				
	R2 (Stream)	2.2560*	1.280*	0.5639*	0.2256*				
	R3 (Stream)	4.2800*	2.1400*	1.0700*	0.4280*				
	R4 (Stream)	4.8720	0.9387	0.4706	0.1962*				
10m Spray drift & Runoff	D3 (Ditch)	2.4990	1.2500*	0.6248*	0.2499*	Nozzle reduction and drift reduction before runoff	Runoff regime and soil texture before runoff		
	D4 (Pond)	0.5861	0.2931	0.1465	0.0586				
	D4 (Stream)	1.5530*	0.7765	0.3883*	0.1553*				
	D5 (Pond)	0.5344	0.2672	0.1336	0.0534				
	D5 (Stream)	1.9390*	0.9396*	0.4848*	0.1939*				
	R1 (Pond)	0.5165*	0.2583	0.1291*	0.0517*				
	R1 (Stream)	0.8469	0.4238	0.2122	0.0853				
	R2 (Stream)	0.0080	0.5040*	0.2520*	0.1008*				
	R3 (Stream)	1.9130*	0.9363*	0.4780*	0.1913*				
	R4 (Stream)	0.8723	0.4368	0.2191	0.0885				
15m Spray drift & Runoff	D3 (Ditch)	1.6260*	0.6309*	0.3155*	0.1262*	Nozzle reduction and drift reduction before runoff	Runoff regime and soil texture before runoff		
	D4 (Pond)	0.3573	0.1887	0.0893	0.0358				
	D4 (Stream)	0.7841*	0.3921*	0.1960*	0.0784*				
	D5 (Pond)	0.3057	0.1629*	0.0814	0.0326				
	D5 (Stream)	0.9791*	0.4890*	0.2448*	0.0979*				
	R1 (Pond)	0.3300*	0.1650*	0.0825*	0.0330*				
	R1 (Stream)	0.4203	0.2105	0.1056	0.0426				
	R2 (Stream)	0.5089*	0.2545*	0.1272*	0.0509*				
	R3 (Stream)	0.9657*	0.4848*	0.2414*	0.0966*				
	R4 (Stream)	0.4332	0.2173	0.1094	0.0446				
20m Spray drift & Runoff	D3 (Ditch)	0.7712*	0.3856*	0.1928*	0.0771*	Nozzle reduction and drift reduction before runoff	Runoff regime and soil texture before runoff		
	D4 (Pond)	0.2350	0.1225	0.0613	0.0245				
	D4 (Stream)	0.4792*	0.2396*	0.1198*	0.0479*				
	D5 (Pond)	0.2234	0.1117	0.0558	0.0223				
	D5 (Stream)	0.5984*	0.2992*	0.1496*	0.0598*				
	R1 (Pond)	0.2550	0.1175*	0.0588*	0.0235*				
	R1 (Stream)	0.2525	0.1263*	0.0631*	0.0253*				
	R2 (Stream)	0.3110*	0.1555*	0.0778*	0.0311*				
	R3 (Stream)	0.5802*	0.2951*	0.1475*	0.0590*				
	R4 (Stream)	0.2523	0.1265	0.0636	0.0259				

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 11:** Summary of FOCUS Step 4 PEC_{sw} values of phosphonic acid (3×3.6 kg fosetyl-Al/ha, 7d int.); Entries marked with * result from single applications - Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Phosphonic acid PEC _{sw} [µg/L]				Nozzle Reduction %	Runoff Regime and runoff reduction		
		0%		50%					
		100% Nozzle Reduction	50% Nozzle Reduction	25% Nozzle Reduction	10% Nozzle Reduction				
5m Spray drift	D3 (Ditch)	6.0610	3.0300	1.5150	0.6061	Nozzle Reduction and runoff reduction	Runoff Regime and runoff reduction		
	D4 (Pond)	6.2870	3.1440	1.5720	0.9134				
	D4 (Stream)	6.1360 *	3.0680 *	2.8450	2.8450				
	D5 (Pond)	6.6600	3.3970	1.7650	0.6766				
	D5 (Stream)	9.0820 *	4.5420 *	2.2010 *	2.2060				
	R1 (Pond)	6.1700	3.1230	1.6000	0.6861				
	R1 (Stream)	8.3720	8.3720	8.3720	8.3720				
	R2 (Stream)	8.4230	8.4230	8.4230	8.4230				
	R3 (Stream)	11.2000 *	6.6000 *	2.8000 *	2.4370				
	R4 (Stream)	11.7200	11.7200	11.7200	11.7200				
10m Spray drift & Runoff	D3 (Ditch)	2.8240	1.4120	0.7060	0.2824	Nozzle Reduction and runoff reduction	Runoff Regime and runoff reduction		
	D4 (Pond)	3.4500	1.7250	1.0380	0.7609				
	D4 (Stream)	2.8450	1.8450	2.8450	2.8450				
	D5 (Pond)	3.7150	1.9240	1.0290	0.5739				
	D5 (Stream)	4.0590	2.3060	2.0600	2.2060				
	R1 (Pond)	3.3760	1.7030	0.8668	0.3651				
	R1 (Stream)	3.6130	3.6130	3.6130	3.6130				
	R2 (Stream)	3.8000	3.8000	3.8000	3.8000				
	R3 (Stream)	5.0040 *	2.5020 *	1.2510 *	1.0970				
	R4 (Stream)	5.1740	5.1740	5.1740	5.1740				
15m Spray drift & Runoff	D3 (Ditch)	1.0000	0.7001	0.5501	0.1400	Nozzle Reduction and runoff reduction	Runoff Regime and runoff reduction		
	D4 (Pond)	1.0300	1.1410	0.8580	0.6885				
	D4 (Stream)	2.8450	2.8450	2.8450	2.8450				
	D5 (Pond)	2.3160	1.2250	0.6798	0.5504				
	D5 (Stream)	2.2060	2.2060	2.2060	2.2060				
	R1 (Pond)	2.0690	1.0500	0.5403	0.2345				
	R1 (Stream)	3.6130	3.6130	3.6130	3.6130				
	R2 (Stream)	3.8000	3.8000	3.8000	3.8000				
	R3 (Stream)	5.2700 *	1.2630 *	1.0970	1.0970				
	R4 (Stream)	5.1740	5.1740	5.1740	5.1740				
20m Spray drift & Runoff	D3 (Ditch)	0.8196 *	0.4098 *	0.2049 *	0.0820 *	Nozzle Reduction and runoff reduction	Runoff Regime and runoff reduction		
	D4 (Pond)	1.4220	0.9631	0.7692	0.6530				
	D4 (Stream)	2.8450	2.8450	2.8450	2.8450				
	D5 (Pond)	1.6310	0.8824	0.5766	0.5389				
	D5 (Stream)	2.2060	2.2060	2.2060	2.2060				
	R1 (Pond)	1.4140	0.7145	0.3649	0.1551				
	R1 (Stream)	1.8550	1.8550	1.8550	1.8550				
	R2 (Stream)	1.9850	1.9850	1.9850	1.9850				
	R3 (Stream)	1.5420 *	0.7722 *	0.5720	0.5720				
	R4 (Stream)	2.6800	2.6800	2.6800	2.6800				

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 12:** Summary of FOCUS Step 4 PEC_{sed} values of phosphonic acid (3×3.6 kg fosetyl-Al/ha, 7d int.); Entries marked with * result from single applications - Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Phosphonic acid PEC _{sed} [µg/kg]				Nozzle Reduction and drift reduction regime	Runoff regime		
		0%		50%					
		0%	50%	50%	90%				
5m Spray drift	D3 (Ditch)	4.9700	0.4850	1.2420	0.4970	Nozzle reduction and drift reduction regime	Runoff regime		
	D4 (Pond)	29.910	15.340	8.1820	4.0820				
	D4 (Stream)	1.1740	1.1500	1.1370	1.1300				
	D5 (Pond)	28.830	15.010	8.1140	4.0550				
	D5 (Stream)	2.3140 *	1.2890 *	0.7767	0.7767				
	R1 (Pond)	23.260	11.790	6.0580	2.6180				
	R1 (Stream)	4.8750	4.8350	4.8150	4.8630				
	R2 (Stream)	6.3720	6.3560	6.3490	6.3440				
	R3 (Stream)	2.5580 *	0.4860	1.4610	0.4450				
10m Spray drift & Runoff	R4 (Stream)	10.150	10.120	10.110	10.100				
	D3 (Ditch)	2.3160	1.1580	0.5790	0.2516	Nozzle reduction and drift reduction regime	Runoff regime		
	D4 (Pond)	16.750	8.8710	5.0540	2.9360				
	D4 (Stream)	1.1480	1.1370	1.1310	1.1270				
	D5 (Pond)	16.360	8.7850	5.0150	3.2030				
	D5 (Stream)	11.1800	0.7867	0.7767	0.7767				
	R1 (Pond)	12.720	6.4210	3.2730	1.3840				
	R1 (Stream)	1.7890	1.7716	1.7610	1.7560				
	R2 (Stream)	2.1690	2.1620	2.1580	2.1550				
	R3 (Stream)	1.1430 *	0.6077	0.5950	0.5889				
15m Spray drift & Runoff	R4 (Stream)	3.2780	2.2540	3.2490	3.2340				
	D3 (Ditch)	1.0480	0.5741	0.2871	0.1148	Nozzle reduction and drift reduction regime	Runoff regime		
	D4 (Pond)	10.580	5.8750	3.6640	2.3970				
	D4 (Stream)	1.1360	1.1310	1.1280	1.1260				
	D5 (Pond)	10.440	5.8380	3.7420	2.8080				
	D5 (Stream)	0.7767	0.7767	0.7767	0.7767				
	R1 (Pond)	7.8010	3.9630	2.0440	0.8929				
	R1 (Stream)	1.7700	1.7610	1.7570	1.7540				
	R2 (Stream)	2.1620	2.1580	2.1560	2.1550				
	R3 (Stream)	0.6075	0.5958	0.5900	0.5865				
20m Spray drift & Runoff	R4 (Stream)	3.2540	3.2420	3.2360	3.2320				
	D3 (Ditch)	0.6692	0.3346	0.1673	0.0669	Nozzle reduction and drift reduction regime	Runoff regime		
	D4 (Pond)	7.1130	4.4600	2.9990	2.1340				
	D4 (Stream)	1.1320	1.1280	1.1270	1.1260				
	D5 (Pond)	7.5450	4.4010	3.2490	2.6160				
	D5 (Stream)	0.7767	0.7767	0.7767	0.7767				
	R1 (Pond)	5.8270	2.6940	1.3780	0.5887				
	R1 (Stream)	0.8788	0.8734	0.8707	0.8691				
	R2 (Stream)	1.0630	1.0610	1.0600	1.0590				
	R3 (Stream)	0.3537 *	0.3061	0.3027	0.3007				
	R4 (Stream)	1.6020	1.5950	1.5920	1.5890				

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Fosetyl-aluminium WG 80

As requested by the RMS France, new PEC_{sw} calculations were performed using the input parameters as provided by ANSES (see Table 9.2.5-14).

Report:	KCP 9.2.5/03 T; [REDACTED]; 2016; M-563432-01-1
Title:	Fosetyl-Al (FEA) and metabolite: PEC _{sw, sed} FOCUS EUR: Use in pome fruit and grapes in Europe
Report No.:	EnSa-16-0661 v1
Document No.:	M-563432-01-1
Guideline(s):	none
Guideline deviation(s):	none
GLP/GEP:	no

Methods and Materials:

Predicted environmental concentrations of the active substance fosetyl-aluminium (Fosetyl-Al) and its metabolite phosphonic acid in surface water (PEC_{sw}) and sediment (PEC_{sed}) were calculated for the use in Europe, employing the tiered FOCUS Surface Water (SW) approach (FOCUS 2001, 2015). All relevant entry routes of a compound into surface water (principally a combination of spray drift and runoff/erosion or drain flow) were considered in these calculations. The use of fosetyl-Al in pome fruits was assessed according to the Good Agricultural Practice (GAP) in Europe. Detailed application parameters are presented in Table 9.2.5-13.

Table 9.2.5- 13: General and FOCUS-specific data on the use pattern of Fosetyl-Al in Europe (for FOCUS Step 1 & 2)

Individual Crop	FOCUS crop used for interception	Application				Season
		Rate per season [g aS/ha]	BBCN stage	Interval [days]	Plant Interception [%]	
Pome fruits	pome stone fruit late applns (fruit crops / late)	3 × 3600	55-85	10	full canopy (65%)	Mar. - May

For fosetyl-Al and its metabolite phosphonic acid, FOCUS Step 3 and Step 4 values were calculated in addition to FOCUS Step 1 and Step 2 values.

On 2016-07-27 the RMS France requested additional PEC calculations during the approval renewal process of the active substance fosetyl-Al. Amalgamated data from three applicants should be used for fosetyl-Al and its metabolite. The input parameters proposed by ANSES are summarised in Table 9.2.5-14.

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 14:** List of the main parameters as proposed by RMS for the risk assessment

Parameter	Input		(Concerning phosphonic acid parameters)
	Fosetyl-Al	Phosphonic acid	
DT ₅₀ soil (days)	0.1	133.7	Geometric mean of all acceptable values ^{a),b),c)}
Maximum occurrence in soil (%)	-	100	-
Maximum occurrence in water (%)	-	100	-
DT ₅₀ water/sed system (days) (STEP 1)	3	1000	-
DT ₅₀ water (days) (STEP 2,3,4)	3	1000	-
DT ₅₀ sediment (days) (STEP 2, 3, 4)	1000	1000	-
K _{foc} (L/kg)	0.1	-	-
K _f (L/kg)	-	15.9	Geometric mean of all acceptable values derived from batch studies ^{b),c)}
1/n	1	0.63	Arithmetic mean of all acceptable values derived from batch studies ^{d),e)}
Crop uptake factor	0	0	Conservative assumption

^{a)} [REDACTED]; 2015; M-532341-01-1; BCS; please refer to Document MCA, Section 7, chapter CA 7.1.2.1.3
^{b)} [REDACTED]; [REDACTED]; 1999; M-184316-01; BCS; please refer to Document MCA, Section 7, chapter CA 7.1.2.1.2
^{c)} [REDACTED]; 2015; S15-00506; Fosetyl-Al Task Force
^{d)} [REDACTED]; 2008; B30701; ISK Biosciences Europe S.A.
^{e)} [REDACTED]; 2007; GAB-014/7-13; Fosetyl-Al Task Force

Remark notifier: ANSES proposes to use 133.7 days as geometric mean DT₅₀ of all acceptable values for calculation of PEC in groundwater. The value of 133.7 days is presumably based on using 1000 days for the [REDACTED] soil based on the slow phase of the DFOP model ([REDACTED]; 2015; M-532341-01-1), and 532 days for the LUFA soil submitted by the FAIRIN task force ([REDACTED]; 2015; S15-00506) based on the HS model. Since both soils show a similar pattern, the HS model is more appropriate for [REDACTED] soil in this light, instead of a very conservative estimation of 1000 days based on only the few last data points, which was deemed unreliable by BCS.

ANSES proposes additionally values of 1000 days to be used as DT₅₀ for PEC in total water/sediment systems (FOCUS Step 1) and, each to be used in surface water and sediment (FOCUS Steps 2, 3, 4). However, the study of [REDACTED] and [REDACTED] (2005; M-251520-01-1) shows that phosphonic acid clearly declines in sediment with a DT₅₀ of 102 days. Thus, the degradation half-life estimated from the sediment compartment should be used as a conservative endpoint for FOCUS modelling. Despite these points, the PEC calculations were carried out with the input parameters proposed by ANSES.

For the metabolite phosphonic acid adsorption/desorption studies suggested significant retention of phosphonic acid by soil indicating a very low leaching potential. The observed sorption behaviour of phosphonic acid or its phosphonate salts involved the formation of insoluble salts and/or complexes with soil. No correlation of sorption with the organic carbon content was found. This is in contrast to the behaviour of carbon containing, i.e. 'organic' compounds. The interaction of phosphonic acid with the organic carbon of soil was thus not regarded to be the main mechanism for sorption. Consequently, the use of a standard K_{foc} value as model input in standard exposure models is scientifically not justified. In the absence of relation between sorption of the compound and soil properties, constant distribution coefficients (K_f or K_d) should be employed instead.

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For exposure modelling the sorption in terms of the Freundlich adsorption coefficient K_f is adequately represented by the use of the geometric mean of the total set of sorption data available (geometric mean $K_f = 15.9 \text{ mL/g}$).

Using the K_f parameter instead of K_{oc} requires the following changes in the FOCUS surface water calculations:

FOCUS Steps 1-2 requires a K_{oc} value as input, which was calculated as a pseudo K_{oc} value of 318 mL/g from the scenario specific organic carbon content of 5% in the sediment.

FOCUS TOXSWA requires a K_{om} value as input, which was calculated as a pseudo K_{om} value of 177 mL/g from the scenario specific organic matter content of 9% in the sediment of all FOCUS Step 3 scenarios.

For FOCUS PRZM and FOCUS MACRO simulation runs the K_f value has to be implemented manually in the input files for each soil layer.

Compound specific input data are summarised below for FOCUS Step 3/4 (see Table 9.2.5-15).

Table 9.2.5- 15: Substance parameters used for fosetyl-Al and its metabolite

Parameter	Unit	Parent	Metabolite
Substance SWASH code		Fosetyl-Al FEA	Phosphonic acid H ₃ PO ₃
General			
Molar mass	(g/mol)	354.19	82
Water solubility (temp.)	(mg/L)	110000 (20 °C)	110000 (20 °C)
Vapour pressure (temp.)	(Pa)	1E-07 (25 °C)	1E-07 (25 °C)
Crop processes			
Coefficient for uptake by plant (TSCE)	(-)	0	0
Wash-off factor	(10 ⁿ)	50	50
Sorption			
K_{oc}	(mL/g)	0.1	305.15 ^{a)}
K_{om}	(mL/g)	0.06	177 ^{a)}
Freundlich exponent ($1/n$)	(-)	1	0.69
Transformation			
DT ₅₀ in soil temperature moisture content (pF) formation fraction in soil	(days) (°C) (log(cm)) (%)	0.1 20 2 3	133.7 20 2 3
DT ₅₀ in water temperature formation fraction in water	(days) (°C) (%)	0.3 20 3	1000 20 3
DT ₅₀ in sediment temperature formation fraction in sediment	(days) (°C) (%)	1000 20 3	1000 20 3
DT ₅₀ on canopy	(days)	10	10
Exponent for the effect of moisture			
PRZM and TOXSWA (Walker exp.)	(-)	0.7	0.7
MACRO (calibrated value)	(-)	0.49	0.49
Effect of temperature			
TOXSWA (molar activation energy)	(kJ/mol)	65.4	65.4
MACRO (effect of temperature)	(1/K)	0.0948	0.0948
PRZM (Q ₁₀)	(-)	2.58	2.58

^{a)} K_f value used for Step 3 modelling with MACRO and PRZM.

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In FOCUS Step 3, the application date for each scenario is determined by the Pesticide Application Timer (PAT), which is part of the FOCUS SW Scenarios. The user may only define an application time window. The actual application date is then set by the PAT in such a way that there are at least 10 mm of rainfall in the first 10 days after application, and at the same time less than 2 mm of rain per day in a five day period around the date of application. If no such date can be found within the application time window, the above rules are step-wise relaxed. Information on application dates can be found in Table 9.2.5- 16.

Table 9.2.5- 16: Application dates of fosetyl-Al for the FOCUS Step 3 calculations for the use in pome fruits

Run IDs	DGR I / PMT I Pome fruit (threefold appln)				
GAP Name (DGR)	Pome fruit (threefold appln)				
Assessment name (PMT)	Pome/stone fruit, late applns (fruit crops/late)				
FOCUS model crop (crop group)	3x3.6 kg/ha/7 days int.				
Use pattern	Air blast (2 - appln foliar linear, 4 cm)				
Appl. method (Run off CAM, depth inc.)					
PAT start date (relative to crop event or absolute)	Absolute				
PAT window range	74 days / 141 days, scenario specific (min = 44 days)				
Drainage scenarios	PAT start/end date (Jul. day, range)	Application date	Rainoff scenarios	PAT start/end date (Jul. day, range)	Application date
D3 Ditch	08-May/26-Sep (128/269, 141)	17-May 24-May 31-Jun	R1 Pond/Stream	08-May/26-Sep (128/269, 141)	09-May 13-Jun 05-Jul
D4 Pond/Stream	20-Jun/11-Oct (174/284, 110)	04-Jul 27-Aug 10-Sep	R2 Stream	08-Jul/20-Sep (189/263, 74)	31-Jul 07-Aug 14-Aug
D5 Pond/Stream	21-May/18-Sep (141/261, 120)	27-May 09-Jun 19-Jul	R3 Stream	21-May/22-Sep (141/265, 124)	01-Jun 16-Jun 30-Jun
			R4 Stream	19-May/22-Sep (139/265, 126)	27-May 12-Jun 25-Jun

Findings:**FOCUS Step 1 and 2:**

The maximum PEC values for FOCUS Step 1 and 2 are given in the tables below for fosetyl-Al and its major metabolite phosphonic acid.

Table 9.2.5- 17: Summary of the maximum PEC_{sw} and PEC_{sed} values fosetyl-Al (FOCUS Steps 1-2)

Usage	Scenario	Fosetyl-Al (FEA)					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Pome / stone fruit, late applns 3×3600g a.s./ha, 7 days int. full canopy Spring (Mar. - May)	Step 1 Step 2 N-EU Multi S-EU Multi N-EU Single S-EU Single	4165.6 163.56 465.56 788.70 188.70	0.5995 0.0900 0.1090 0.1250 0.1257	2066.9 81.418 81.418 93.934 93.934	2.0264 0.0625 0.0625 0.0721 0.0721	852.60 33.597 33.594 38.758 38.758	0.8891 0.0273 0.0273 0.0315 0.0315

Table 9.2.5- 18: Summary of the maximum PEC_{sw} and PEC_{sed} values phosphonic acid (FOCUS Steps 1-2)

Usage	Scenario	Phosphonic acid					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Pome / stone fruit, late applns 3×3600g a.s./ha, 7 days int. full canopy Spring (Mar. - May)	Step 1 Step 2 N-EU Multi S-EU Multi N-EU Single S-EU Single	3905.5 309.21 445.37 142.95 182.18	12039 978.90 1348.5 419.25 546.79	3787.6 308.83 424.71 132.33 172.37	11955 976.59 1344.8 418.23 545.46	3763.7 306.34 421.66 131.22 171.06	11939 971.87 1338.3 416.21 542.83

FOCUS Step 3 and 4:

The maximum PEC values for FOCUS Step 3 and 4 are given in the tables below for fosetyl-Al and its metabolite phosphonic acid considering the application in pome fruits.

Single and multiple application PEC_{sw} and PEC_{sed} values are presented for all relevant scenarios in Step 3 and 4.

Table 9.2.5- 19: PEC_{sw} and PEC_{sed} values of fosetyl-Al in pome fruits (3x3600 g/ha – 7 day intervals) for all calculated scenarios according to FOCUS SW Step 3

	Scenario	Entry route	Fosetyl-Al					
			PEC _{max}		TWA 7 days		TWA 21 days	
			Spray drift [µg/L]	Runoff [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Multiple applications	D3 (Ditch)	S	93.930	7.6890	19.810	4.9460	16.080	3.5740
	D4 (Pond)	S	4.9500	0.9342	3.3340	0.9138	2.3010	0.7890
	D4 (Stream)	S	94.640	3.1780	3.6050	0.7967	1.2029	0.4307
	D5 (Pond)	S	4.9440	0.8517	2.9990	0.8227	2.3000	0.6705
	D5 (Stream)	S	102.30	4.3700	3.4640	1.5020	2.6090	1.0630
	R1 (Pond)	S	4.4280	0.7465	2.9820	0.7156	1.6640	0.5737
	R1 (Stream)	S	72.920	2.3050	2.1370	0.5647	0.7183	0.3290
	R2 (Stream)	S	97.200	2.3100	1.4680	0.5256	1.4870	0.4329
	R3 (Stream)	S	102.20	4.4120	3.2620	1.5780	3.5080	1.2090
	R4 (Stream)	S	72.510	2.3740	2.1470	0.6249	1.4220	0.4649
Single application	D3 (Ditch)	S	132.10	8.2860	22.830	4.7610	7.6190	2.6750
	D4 (Pond)	S	0.9290	0.6522	8.4020	0.6279	1.5670	0.5042
	D4 (Stream)	S	132.60	4.4530	5.0520	1.1460	1.6840	0.6033
	D5 (Pond)	S	5.9300	0.7446	3.8340	0.7206	1.8810	0.5958
	D5 (Stream)	S	143.20	5.5600	7.5220	1.6470	2.5050	0.8934
	R1 (Pond)	S	5.9250	0.8144	4.040	0.7996	2.2900	0.7035
	R1 (Stream)	S	99.740	2.3460	1.8400	0.4092	0.6199	0.2219
	R2 (Stream)	S	136.20	2.8900	2.0570	0.4571	0.6856	0.2456
	R3 (Stream)	S	143.20	5.4840	7.3930	1.6160	2.4580	0.8759
	R4 (Stream)	S	99.320	2.2750	0.6850	0.3753	0.5617	0.2018

In bold: highest PEC_{sw} value

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Fosetyl-aluminium WG 80**Table 9.2.5- 20:** PEC_{sw} and PEC_{sed} values of phosphonic acid in pome fruits (3x3600 g fosetyl-Al/ha – 7 day intervals) for all calculated scenarios according to FOCUS SW Step 3

Scenario		Phosphonic acid					
		PEC max		TWA 7 days		TWA 21 days	
		SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]	SW [µg/L]	Sed [µg/kg]
Multiple applications	D3 (Ditch)	8.7580	11.310	2.9140	9.6010	19.400	7.4230
	D4 (Pond)	5.8420	54.340	5.8310	54.320	5.7520	54.260
	D4 (Stream)	8.7620	6.6470	2.1750	5.4850	0.7957	4.690
	D5 (Pond)	15.550	170.70	15.390	170.40	14.810	169.70
	D5 (Stream)	14.840	31.570	8.3700	30.740	4.8920	28.350
	R1 (Pond)	5.7860	44.810	5.7640	44.810	5.6130	44.780
	R1 (Stream)	10.390	9.150	1.1940	6.1590	0.5406	4.8450
	R2 (Stream)	15.990	11.170	2.0990	7.2340	0.8628	6.1536
	R3 (Stream)	10.400	5.550	0.6249	4.400	0.4170	3.8450
	R4 (Stream)	23.460	31.810	4.7130	18.750	2.9120	16.650
Single application	D3 (Ditch)	8.7340	7.3500	2.2560	5.5530	0.7690	3.9420
	D4 (Pond)	3.1836	26.930	3.1740	26.910	3.1100	26.810
	D4 (Stream)	7.9020	4.6960	0.3422	1.1440	0.1144	0.8656
	D5 (Pond)	3.2450	32.690	3.3480	32.690	3.2890	32.640
	D5 (Stream)	11.770	3.9540	0.6988	2.7530	0.2449	2.0580
	R1 (Pond)	2.8030	22.150	2.7940	22.150	2.7370	22.140
	R1 (Stream)	6.8620	4.2040	0.5701	3.1340	0.2633	2.4940
	R2 (Stream)	6.4650	3.4460	0.4398	3.1150	0.1930	2.7050
	R3 (Stream)	14.560	4.1230	0.8732	2.6380	0.2921	1.8430
	R4 (Stream)	5.7646	7.0420	0.8553	6.6200	0.5171	6.3940

In bold: highest PEC_{sw} value

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Fosetyl-aluminium WG 80**FOCUS Step 4**

FOCUS Step 4 calculations considering different buffer zones in combination with mitigation by drift reducing nozzles (where applicable) were conducted based on the Step 3 results. In the following a summary of PEC values resulting from single and multiple applications for relevant crops are given for fosetyl-Al and phosphonic acid.

Table 9.2.5- 21: Summary of FOCUS Step 4 PEC_{sw} values of fosetyl-Al (3×36 kg a.s./ha, 7 days int.)
Entries marked with * result from single applications. Pome/stone fruit, late
applications

Buffer Width & Type	Scenario	Fosetyl-Al PEC _{sw} [µg/L]			
		Nozzle Reduction			
		0%	50%	75%	90%
5m Spray drift	D3 (Ditch)	S 89.130*	S 43.570*	S 22.280*	S 8.9130*
	D4 (Pond)	S 6.7810*	S 3.9000*	S 1.6950*	S 0.6781*
	D4 (Stream)	S 103.50*	S 51.750*	S 25.870*	S 10.350*
	D5 (Pond)	S 7.7820*	S 3.3940*	S 1.6960*	S 0.6782*
	D5 (Stream)	S 111.80*	S 58.890*	S 27.940*	S 11.180*
	R1 (Pond)	S 6.7760*	S 3.3880*	S 1.6940*	S 0.6776*
	R1 (Stream)	S 77.830*	S 38.910*	S 16.460*	S 7.7830*
	R2 (Stream)	S 106.30*	S 53.050*	S 26.580*	S 10.630*
	R3 (Stream)	S 111.80*	S 58.890*	S 27.940*	S 11.180*
	R4 (Stream)	S 77.520*	S 38.760*	S 19.380*	S 7.7520*
10m Spray drift & Runoff	D3 (Ditch)	S 39.830*	S 19.920*	S 9.9580*	S 3.9830*
	D4 (Pond)	S 0.7610*	S 1.8800*	S 0.9402*	S 0.3761*
	D4 (Stream)	S 46.20*	S 23.120*	S 11.560*	S 4.6250*
	D5 (Pond)	S 3.7620*	S 1.8810*	S 0.9404*	S 0.3762*
	D5 (Stream)	S 49.950*	S 24.970*	S 12.490*	S 4.9950*
	R1 (Pond)	S 3.7580*	S 1.8790*	S 0.9395*	S 0.3758*
	R1 (Stream)	S 34.780*	S 17.390*	S 8.6940*	S 3.4780*
	R2 (Stream)	S 47.000*	S 23.750*	S 11.880*	S 4.7500*
	R3 (Stream)	S 49.950*	S 24.980*	S 12.490*	S 4.9950*
	R4 (Stream)	S 84.640*	S 42.320*	S 8.6600*	S 3.4640*
15m Spray drift & Runoff	D3 (Ditch)	S 20.110*	S 10.060*	S 5.0280*	S 2.0110*
	D4 (Pond)	S 24.030*	S 1.2010*	S 0.6007*	S 0.2403*
	D4 (Stream)	S 23.350*	S 11.680*	S 5.8380*	S 2.3350*
	D5 (Pond)	S 24.030*	S 10.020*	S 0.6008*	S 0.2403*
	D5 (Stream)	S 25.220*	S 12.610*	S 6.3050*	S 2.5220*
	R1 (Pond)	S 24.010*	S 1.2010*	S 0.6003*	S 0.2401*
	R1 (Stream)	S 17.560*	S 8.7800*	S 4.3900*	S 1.7560*
	R2 (Stream)	S 23.980*	S 11.990*	S 5.9960*	S 2.3980*
	R3 (Stream)	S 25.220*	S 12.610*	S 6.3050*	S 2.5220*
	R4 (Stream)	S 17.490*	S 8.7450*	S 4.3730*	S 1.7490*
20m Spray drift & Runoff	D3 (Ditch)	S 12.290*	S 6.1450*	S 3.0730*	S 1.2290*
	D4 (Pond)	S 1.7100*	S 0.8555*	S 0.4277*	S 0.1711*
	D4 (Stream)	S 14.270*	S 7.1360*	S 3.5680*	S 1.4270*
	D5 (Pond)	S 17.110*	S 0.8556*	S 0.4278*	S 0.1711*
	D5 (Stream)	S 15.410*	S 7.7070*	S 3.8530*	S 1.5410*
	R1 (Pond)	S 1.7100*	S 0.8549*	S 0.4274*	S 0.1710*
	R1 (Stream)	S 10.730*	S 5.3660*	S 2.6830*	S 1.0730*
	R2 (Stream)	S 14.660*	S 7.3290*	S 3.6650*	S 1.4660*
	R3 (Stream)	S 15.410*	S 7.7070*	S 3.8540*	S 1.5410*
	R4 (Stream)	S 10.690*	S 5.3450*	S 2.6720*	S 1.0690*

S, R and D denote main entry route via spray drift, runoff or drainage, respectively

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Fosetyl-aluminium WG 80**Table 9.2.5- 22:** Summary of FOCUS Step 4 PEC_{sed} values of fosetyl-Al (3×3.6 kg a.s./ha, 7 days int.); Entries marked with * result from single applications. Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Fosetyl-Al PEC _{sed} [µg/kg]					Nozzle Reduction	Runoff reduction	Dilution regime		
		0%		50%		75%					
		0%	*	50%	*	75%	*				
5m Spray drift	D3 (Ditch)	5.5930	*	2.3960	*	1.3980	*	0.5593	*		
	D4 (Pond)	1.0680		0.5341		0.2671		0.1068			
	D4 (Stream)	3.4750	*	1.7380	*	0.8688		0.3475			
	D5 (Pond)	0.9739		0.4869		0.2435		0.0974			
	D5 (Stream)	4.3400	*	2.1700	*	1.0860		0.4340			
	R1 (Pond)	0.9313		0.4657		0.2328		0.0931			
	R1 (Stream)	1.8310	*	0.9157	*	0.4578		0.1831			
	R2 (Stream)	2.2560		1.1780		0.5639		0.2256			
	R3 (Stream)	4.2800	*	2.1400		1.0700		0.4280			
10m Spray drift & Runoff	R4 (Stream)	1.8720	*	0.9378		0.4706		0.1902			
	D3 (Ditch)	2.4990	*	1.2500	*	0.6248		0.2499	*		
	D4 (Pond)	0.5861		0.2931		0.1464		0.0586			
	D4 (Stream)	1.5530	*	0.7765	*	0.3883		0.1553	*		
	D5 (Pond)	0.5344		0.2672		0.1336		0.0534			
	D5 (Stream)	1.9390	*	0.9698	*	0.4848		0.1939	*		
	R1 (Pond)	0.5165		0.2583		0.1291		0.0517			
	R1 (Stream)	0.8469		0.4238		0.2422		0.0853			
	R2 (Stream)	1.0080		0.5040		0.2520		0.1008			
15m Spray drift & Runoff	R3 (Stream)	1.9130		0.9563		0.4781		0.1913	*		
	R4 (Stream)	0.8729		0.4368		0.2199		0.0885			
	D3 (Ditch)	1.2620	*	0.6309	*	0.3455		0.1262	*		
	D4 (Pond)	0.3573		0.1787		0.0893		0.0358	*		
	D4 (Stream)	0.7841	*	0.3921		0.1960		0.0784	*		
	D5 (Pond)	0.3267		0.1629		0.0814		0.0326			
	D5 (Stream)	0.9791	*	0.4896	*	0.2448		0.0979			
	R1 (Pond)	0.3300		0.1650		0.0825		0.0330			
	R1 (Stream)	0.4203		0.2105		0.1056		0.0426			
20m Spray drift & Runoff	R2 (Stream)	0.5089	*	0.2545	*	0.1272		0.0509			
	R3 (Stream)	0.6357		0.4828	*	0.2414		0.0966	*		
	R4 (Stream)	0.4332		0.2173		0.1094		0.0446			
	D3 (Ditch)	0.7712	*	0.3856	*	0.1928		0.0771	*		
	D4 (Pond)	0.2450		0.1225		0.0613		0.0245			
	D4 (Stream)	0.4792	*	0.2396	*	0.1198		0.0479			
	D5 (Pond)	0.2234		0.1117		0.0558		0.0223			
	D5 (Stream)	0.5981	*	0.2992	*	0.1496		0.0598			
	R1 (Pond)	0.2850		0.1175	*	0.0588		0.0235			
	R1 (Stream)	0.5525		0.1263	*	0.0631		0.0253			
	R2 (Stream)	0.3110		0.1555	*	0.0778		0.0311			
	R3 (Stream)	0.5962	*	0.2951	*	0.1475		0.0590			
	R4 (Stream)	0.2523		0.1265		0.0636		0.0259			

S, R and D denote main entry route via spray drift, runoff or drainage, respectively

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Fosetyl-aluminium WG 80**Table 9.2.5- 23:** Summary of FOCUS Step 4 PEC_{sw} values of phosphonic acid (3×3.6 kg fosetyl-Al/ha, 7 days int.); Entries marked with * result from single applications - Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Phosphonic acid PEC _{sw} [µg/L]					Nozzle Reduction	Runoff regime	
		0%		50%		75%			
		0%	50%	50%	75%	75%	90%		
5m Spray drift	D3 (Ditch)	5.9940	*	2.9900	*	1.4930	*	0.5959	
	D4 (Pond)	6.7030	*	4.0090	*	3.0120	*	2.4310	
	D4 (Stream)	8.7620	*	8.7620	*	8.7620	*	8.7620	
	D5 (Pond)	7.6130	*	3.9110	*	2.1780	*	1.8870	
	D5 (Stream)	9.1860	*	5.3930	*	5.3930	*	5.3930	
	R1 (Pond)	6.6180	*	3.3180	*	1.6910	*	0.7311	
	R1 (Stream)	13.390	*	13.390	*	13.390	*	13.390	
	R2 (Stream)	15.990	*	15.990	*	15.990	*	15.990	
	R3 (Stream)	11.370	*	5.6820	*	4.7060	*	4.7060	
10m Spray drift & Runoff	R4 (Stream)	23.460	*	23.460	*	23.460	*	23.460	
	D3 (Ditch)	2.7860	*	1.3940	*	0.6944	*	0.2753	
	D4 (Pond)	4.2050	*	3.0080	*	2.5730	*	2.2620	
	D4 (Stream)	8.7620	*	8.7620	*	8.7620	*	8.7620	
	D5 (Pond)	4.2690	*	2.2640	*	1.6380	*	1.8010	
	D5 (Stream)	5.3930	*	5.3930	*	5.3930	*	5.3930	
	R1 (Pond)	3.5630	*	1.740	*	0.8941	*	0.3761	
	R1 (Stream)	5.7060	*	5.7760	*	5.7060	*	5.7760	
	R2 (Stream)	7.2110	*	7.2110	*	7.2110	*	7.2110	
15m Spray drift & Runoff	R3 (Stream)	5.0780	*	2.5580	*	2.0490	*	2.0490	
	R4 (Stream)	10.350	*	10.350	*	10.350	*	10.350	
	D3 (Ditch)	1.3790	*	0.6885	*	0.3438	*	0.1373	
	D4 (Pond)	3.3460	*	2.6890	*	2.3690	*	2.1830	
	D4 (Stream)	8.7620	*	8.7620	*	8.7620	*	8.7620	
	D5 (Pond)	2.7000	*	2.0160	*	1.8560	*	1.7610	
	D5 (Stream)	5.3930	*	5.3930	*	5.3930	*	5.3930	
	R1 (Pond)	1.1640	*	1.0860	*	0.5556	*	0.2438	
	R1 (Stream)	5.7760	*	5.7760	*	5.7760	*	5.7760	
20m Spray drift & Runoff	R2 (Stream)	7.2110	*	7.2110	*	7.2110	*	7.2110	
	R3 (Stream)	2.5530	*	2.0490	*	2.0490	*	2.0490	
	R4 (Stream)	10.350	*	10.350	*	10.350	*	10.350	

S, R and D denote main entry route via spray drift, runoff or drainage, respectively

Document MCP – Section 9: Fate and behaviour in the environment
Fosetyl-aluminium WG 80**Table 9.2.5- 24:** Summary of FOCUS Step 4 PEC_{sed} values of phosphonic acid (3×3.6 kg fosetyl-Al/ha, 7 days int.); Entries marked with * result from single applications - Pome/stone fruit, late applications

Buffer Width & Type	Scenario	Phosphonic acid PEC _{sed} [µg/kg]				Nozzle Reduction	Runoff Regime		
		0%		50%					
		50% spray drift	75% spray drift	50% spray drift + runoff	75% spray drift + runoff				
5m Spray drift	D3 (Ditch)	8.2770		4.3040		2.4380			
	D4 (Pond)	60.000		36.850		24.700			
	D4 (Stream)	6.5890		6.4750		6.4120			
	D5 (Pond)	73.400		45.670		31.480			
	D5 (Stream)	4.4020		4.1580		4.0290			
	R1 (Pond)	50.170		28.230		16.370			
	R1 (Stream)	9.0960		8.9430		8.9400			
	R2 (Stream)	11.090		1.6010		0.9700			
	R3 (Stream)	5.1900		4.8690		4.6970			
10m Spray drift & Runoff	D3 (Ditch)	4.2320		2.2900		1.2330			
	D4 (Pond)	39.180		25.850		19.270			
	D4 (Stream)	6.4660		6.4070		6.3750			
	D5 (Pond)	48.390		32.890		24.900			
	D5 (Stream)	9.1410		4.0300		0.9580			
	R1 (Pond)	29.480		16.390		9.3240			
	R1 (Stream)	3.8190		3.7630		3.7340			
	R2 (Stream)	4.7310		4.6890		4.6650			
	R3 (Stream)	2.1950		2.0260		1.9350			
15m Spray drift & Runoff	D3 (Ditch)	2.2730		1.2240		0.6564			
	D4 (Pond)	28.750		20.740		16.640			
	D4 (Stream)	6.4070		6.3740		6.3570			
	D5 (Pond)	36.340		26.620		21.800			
	D5 (Stream)	4.0190		3.9570		3.9250			
	R1 (Pond)	19.350		10.920		6.3810			
	R1 (Stream)	3.7620		3.7340		3.7190			
	R2 (Stream)	4.6880		4.6650		4.6520			
	R3 (Stream)	2.0250		1.9350		1.8870			
20m Spray drift & Runoff	D3 (Ditch)	1.4040		0.7335		0.4030			
	D4 (Pond)	23.720		18.170		15.320			
	D4 (Stream)	6.3800		6.3600		6.3490			
	D5 (Pond)	30.270		23.610		20.260			
	D5 (Stream)	3.9680		3.9310		3.9120			
	R1 (Pond)	13.460		7.6690		4.3890			
	R1 (Stream)	1.9800		1.9620		1.9520			
	R2 (Stream)	2.4810		2.4660		2.4580			
	R3 (Stream)	1.0990		1.0420		1.0110			
	R4 (Stream)	4.8760		4.8560		4.8460			

S, R and D denote main entries route via spray drift, runoff or drainage, respectively

CP 9.3 Fate and behaviour in air

For information on the fate and behaviour in air please refer to Document MCA, Section 7.3.

CP 9.3.1 Route and rate of degradation in air and transport via air

For information on route and rate of degradation in air and transport via air please refer to Document MCA, Sections 7.3.1 and 7.3.2.

CP 9.4 Estimation of concentrations for other routes of exposure

There are no other routes of exposure if the product is used according to good agricultural practice. Therefore no further estimations are considered necessary.