

# APP204244 - reassessment of tebuconazole and propiconazole

## Submission Reference no: 2

██████████, Arch Wood Protection (NZ Limited) trading as Arxada Wood Protection NZ ██████████

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Ph: ██████████

**Submitter Type:** Not specified

**Source:** Web Form

### Overall Notes:

#### Clause

1. What is your position on the proposals set out in the reassessment application? Please outline your reasons in the text box below.

#### Position

I oppose the application

#### Notes

We disagree with the skin sensitization classification proposed for number of the RTUs, which contains Tebuconazole, Propiconazole and Permethrin at different concentrations. We have GLP skin sensitization tests conducted with two RTU formulations (Substance 1: 0.6% w/v Tebuconazole, 0.61% w/v Propiconazole and 0.39% w/v Permethrin; Substance 2: 0.78% w/v Tebuconazole, 0.79% w/v Propiconazole and 0.64% w/v Permethrin), which demonstrates, that the formulations are not a skin sensitizers. We believe, that these studies provide enough information and can be read across to other RTUs to conclude that they are not skin sensitizers. Please note the attached study reports are Confidential, but public summary is also attached.

#### Clause

2. All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

#### Position

No I do not wish to speak about my submission at the hearing

#### Notes

**The submitter have elected to withhold their personal details from publication.**

Summary of the skin sensitization data

| Substance   | Skin sensitization | Test (test animal)              | Reference   |
|---|--------------------|---------------------------------|---|
| RTU<br>0.60% w/v Tebuconazole,<br>0.61% w/v Propiconazole<br>0.39% w/v Permethrin | N                  | Buehler method<br>(Guinea Pig)  | [REDACTED],<br>Sensitization Study<br>of Vascol Azure<br>RTU in Guinea<br>Pigs,<br>SP140640010,<br>2014 |
| RTU<br>0.78% w/v Tebuconazole,<br>0.79% w/v Propiconazole<br>0.64% w/v Permethrin | N                  | Guinea Pig<br>Maximisation Test | [REDACTED], Vascol<br>Azure (RTU) Skin<br>Sensitization Study<br>in Guinea<br>Pigs,13482-09,<br>2010    |

Two studies have not been made publicly available as part of this submission as they are considered confidential.