

To whom it may concern

The DOBOL Fumigator product is based on the Cyphenothrin active substance (7.2%). The active substance underlying our fumigator's excellent performance has been approved at European Union level in 2018, after a long period of evaluation by experts.

For more than three decades, a plethora of studies have been conducted in ever more strict growing toxicological requirements demonstrating beyond doubt that **the Cyphenothrin is neither Cancerogenic nor Mutagenic or Reprotoxic** in effect.

In the light of all available studies, the European authorities (ECHA and European Commission) do not consider the active substance to be CMR (Carcinogen, Mutagen, toxic for Reproduction)<sup>1</sup>.

These conclusions are also followed and listed in the C&L inventory of ECHA (platform listing all the used active substances classifications when it is not harmonized)<sup>2</sup>. The notification of classification is a legal obligation for the active substance suppliers.

**As such we emphasize that no such classification is true or intended for the active substance.**

**Considering these elements and the product composition of the DOBOL Fumigator, the product is also not classified for CMR.**

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A qui de droit

Le produit DOBOL Fumigateur contient la substance active Cyphénothrine (7,2%). Cette substance active à la base des excellentes performances de notre fumigateur a été approuvée au niveau de l'Union européenne en 2018, après une longue période d'évaluation par des experts.

Depuis plus de trois décennies, une pléthore d'études ont été menées dans des conditions toxicologiques de plus en plus strictes, démontrant sans l'ombre d'un doute que **la Cyphénothrine n'est ni cancérigène, ni mutagène, ni reprotoxique**.

À la lumière de toutes les études disponibles, les autorités européennes (ECHA et Commission européenne) ne considèrent pas la substance active comme CMR (cancérogène, mutagène, toxique pour la reproduction).

Ces conclusions sont également suivies et listées dans l'inventaire C&L de l'ECHA (plateforme listant toutes les classifications de substances actives lorsqu'elles ne sont pas harmonisées). La notification de la classification est une obligation légale pour les fournisseurs de substances actives.

**A ce titre, nous insistons sur le fait que ce type de classification est ni vrai, ni en discussion pour la substance active.**

**Compte tenu de ces éléments et de la composition du produit DOBOL Fumigateur, le produit n'est pas non plus classé comme CMR.**

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<sup>1</sup>See annex 1

<sup>2</sup>See annex 2

### ANNEX 1

Extract from the CAR / Extrait du CAR ([e719a645-5e16-f98a-e7e9-6545da746a2b](#))

#### 3.1.1. Assessment of CMR properties

Criteria (BPR Article 5[1])	Assessment
Active substances which have been classified in accordance with Regulation (EC) No 1272/2008 as, or which meet the criteria to be classified as, carcinogen category 1A or 1B.	Cyphenothrin does not meet the criteria to be classified as, carcinogen category 1A or 1B.
Active substances which have been classified in accordance with Regulation (EC) No 272/2008 as, or which meet the criteria to be classified as, mutagen category 1A or 1B.	Cyphenothrin does not meet the criteria to be classified as, mutagen category 1A or 1B.
Active substances which have been classified in accordance with Regulation (EC) No 1272/2008 as, or which meet the criteria to be classified as, toxic for reproduction category 1A or 1B.	Cyphenothrin does not meet the criteria to be classified as, toxic for reproduction category 1A or 1B.

<b>Conclusion on CMR properties</b>	Cyphenothrin does not meet the criteria for classification as CMR.
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Extract from the BPR opinión/ Extrait de l'opinion BPC ([e719a645-5e16-f98a-e7e9-6545da746a2b](#))

Property		Conclusions	
CMR properties	Carcinogenicity (C)	no classification required	Cyphenothrin does not fulfil criterion (a), (b) or (c) of Article 5(1)
	Mutagenicity (M)	no classification required	
	Toxic for reproduction (R)	no classification required	

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**ANNEX 2**

C&L Inventory of the Cyphenotrin  
matière active Cyphénothrine

active substance / Inventaire C&L de la



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