



(Vayego -Tetraniprole)

We have reservations regarding the introduction of Vayego as it has not been approved for use in any country despite field trials dating back to 2006.(Canada).

In particular we note the following:

#### Resistance

Continued use of other diamide insecticides has resulted in the build up of serious resistance in targeted insects.

#### Toxicity

Tetraniprole is very toxic to aquatic life with long lasting effects.(ECHA) While the application suggests that proposed concentration of 300M/ Hectare will “not pose unacceptable or irreversable effects on aquatic insects” Tetraniprole has been reported to bioaccumulate in fish and in sedimentary fauna.(ECHA)

#### Vayego application methods.

We do not believe that in irrigated areas nor in medium to high rainfall areas it will be possible to avoid some run off into waterways, with serious consequences because of the long lasting effects to aquatic life. For the same reason we are opposed to any aerial application.

#### Effects on non targeted insects (Bees)

We note the intention not to apply Vayego to plants that are in flower or that are expected to flower within seven days. We would respectfully suggest most areas , particularly orchards would have some flora either within or close by which would be in flower or about to flower most of the time. We recommend that the very toxic effect on non target insects be taken into account before any approval is granted.

Sources of information : [www/pubchem.ncbi.nih.gov](http://www/pubchem.ncbi.nih.gov)

[www/cdpr.ca.gov](http://www.cdpr.ca.gov).

[hpta//echa.europa.eu](http://echa.europa.eu)