

## Evaluation Report for Category B, Subcategory 1.1 Application

**Application Number:** 2021-1894  
**Application:** Changes to TGAI Product Chemistry – New Source (site) Same Registrant  
**Product:** ADAMA Clopyralid Technical Herbicide  
**Registration Number:** 33802  
**Active ingredient (a.i.):** Tebuconazole  
**PMRA Document Number:** 3392800

### Purpose of Application

The purpose of this submission is to add a new manufacturing site to ADAMA Clopyralid Technical Herbicide.

### Chemistry Assessment

Common Name: Clopyralid  
 IUPAC\* Chemical Name: 3,6-dichloropyridine-2-carboxylic acid  
 CAS† Chemical Name: 3,6-dichloro-2-pyridinecarboxylic acid

\* International Union of Pure and Applied Chemistry

† Chemical Abstracts Service

ADAMA Clopyralid Technical Herbicide has the following properties:

Property	Result								
Colour and physical state	White solid								
Nominal concentration	98.0%								
Odour	Odourless								
Density	1.73 g/mL								
Vapour pressure	0.327 mPa								
pH	1.61								
Solubility in water	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="border: none;">pH</th> <th style="border: none;">Solubility (g/L)</th> </tr> </thead> <tbody> <tr> <td style="border: none;">1.84</td> <td style="border: none;">7.67</td> </tr> <tr> <td style="border: none;">3.64</td> <td style="border: none;">127.55</td> </tr> <tr> <td style="border: none;">6.94</td> <td style="border: none;">344.12</td> </tr> </tbody> </table>	pH	Solubility (g/L)	1.84	7.67	3.64	127.55	6.94	344.12
	pH	Solubility (g/L)							
	1.84	7.67							
	3.64	127.55							
6.94	344.12								

Property	Result	
n-Octanol/water partition coefficient	pH	log $K_{ow}$
	2.70	0.547
	5.17	-1.871
	7.22	-2.519

The required chemistry data for ADAMA Clopyralid Technical Herbicide have been provided, reviewed, and found to be acceptable.

### **Health, Environmental and Value Assessments**

Health, environmental and value assessments were not required for this application.

### **Conclusion**

The Pest Management Regulatory Agency has completed an assessment of the information provided, and has found the information sufficient to support addition of the manufacturing site to ADAMA Clopyralid Technical Herbicide.

## References

<b>PMRA Document Number</b>	<b>References</b>
2928919	2016, Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Clopyralid Technical, DACO: 2.11.1,2.11.2,2.11.3,2.11.4,2.12.1,2.4,2.5,2.6,2.7,2.8,2.9 CBI
2928921	2017, Analysis of [CBI Removed] in Clopyralid, DACO: 2.13.4 CBI
2928923	2016, Determination of Physical and Chemical Properties of Clopyralid, DACO: 2.14.1,2.14.10,2.14.11,2.14.12,2.14.13,2.14.15,2.14.2,2.14.3,2.14.4,2.14.6,2.14.7, 2.14.8,2.14.9,830.7000 CBI
3227211	2021, L2545978 CB Data Package 210316, DACO: 2.13.4 CBI
3227212	2021, SVOC Data Package Appendix 1: Instrument Output Documents, DACO: 2.13.4 CBI
3243834	2021, 33802-ADAMA Clopyralid TGAI-date of manufacture of batches- 23june2021, DACO: 2.13.3 CBI
3265094	2017, Clopyralid Analytical Profile, DACO: 2.13.1,2.13.2,2.13.3 CBI

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