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Outcome of the consultation with Member States and EFSA on the basic substance application for approval of vinegar for the extension of use in plant protection as a herbicide for non-agricultural areas

European Food Safety Authority (EFSA)

Abstract

The European Food Safety Authority (EFSA) was asked by the European Commission to provide scientific assistance with respect to the evaluation of applications received by the European Commission concerning basic substances. In this context, EFSA's scientific views on the specific points raised during the commenting phase conducted with Member States and EFSA on the basic substance application for an extension of use for vinegar are presented. The context of the evaluation was that required by the European Commission in accordance with Article 23 of Regulation (EC) No 1107/2009 following the submission of an application for approval of vinegar as a basic substance for an extension of use in plant protection as a herbicide for non-agricultural areas. The current report summarises the outcome of the consultation process organised by EFSA and presents EFSA's scientific views on the individual comments received.

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Keywords: vinegar, basic substance, application, consultation, plant protection, pesticide, herbicide

Requestor: European Commission

Question number: EFSA-Q-2019-00625

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Summary

Vinegar is an active substance for which, in accordance with Article 23(3) of Regulation (EC) No 1107/2009, the European Commission received an application from Charbonneaux - Brabant S.A. and Greenpharma S.A.S. for approval of an extension of use as a 'basic substance'. Regulation (EC) No 1107/2009 introduced the new category of 'basic substances', which are described, among others, as active substances, not predominantly used as plant protection products but which may be of value for plant protection and for which the economic interest in applying for approval may be limited. Article 23 of Regulation (EC) No 1107/2009 lays down specific provisions for consideration of applications for approval of basic substances.

In March 2013, the European Commission requested the European Food Safety Authority (EFSA) to provide scientific assistance with respect to the evaluation of applications received by the European Commission concerning basic substances.

On 21 March 2014 EFSA received a first request from the European Commission to organize a consultation on the basic substance application submitted by the applicants Institut Technique de L'Agriculture Biologique (ITAB) and Mairie de Paris for vinegar as a fungicide and bactericide, to consult the applicants on the comments received, and to deliver its scientific views on the specific points raised in the format of a reporting table. A Technical Report containing the finalised reporting table was issued by EFSA on 31 July 2014.

In May 2017, EFSA received a second request from the European Commission to organise a consultation following the basic substance application submitted by Charbonneaux - Brabant S.A for the extension of use of vinegar as a herbicide, and to finalise the reporting table with EFSA's scientific views on the specific points raised, leading to the Technical Report issued by EFSA on 4 August 2017.

Vinegar was approved on 1 July 2015 by Commission Implementing Regulation (EU) 2015/1108, in accordance with Article 23 of Regulation (EC) No 1107/2009, for the uses as a fungicide and bactericide, and subsequently, the conditions of approval has been amended by Commission Implementing Regulation (EU) No 2019/149 to allow uses also as a herbicide.

Following a further application submitted by Charbonneaux - Brabant S.A. and Greenpharma S.A.S. for approval of vinegar as a basic substance for an extension of use in plant protection as a herbicide for non-agricultural areas, on 1 October 2019 EFSA received a further request from the European Commission to organise a consultation on the basic substance application, to consult the applicant on the comments received, and to deliver its scientific views on the specific points raised in the format of a reporting table.

Accordingly, a consultation on the basic substance application for the extension of use of vinegar, organised by EFSA, was conducted with Member States via a written procedure in June - August 2019. Subsequently, EFSA also provided comments and the applicant was invited to address all the comments received in the format of a reporting table and to provide an application update as appropriate, within a period of 30 days.

The current report summarises the outcome of the consultation process organised by EFSA on the basic substance application for the extension of use of vinegar in plant protection as a herbicide for non-agricultural areas, and presents EFSA's scientific views on the individual comments received in the format of a reporting table.

Vinegar is a liquid produced from suitable products containing starch and/or sugars by the process of double fermentation, first alcoholic and then acetous. It should be of food grade containing a maximum of 10 % acetic acid. Vinegar may contain optional ingredients. Acetic acid is the IUPAC name for the active substance of the product vinegar. There is no ISO common name for this compound.

Vinegar is mainly used as foodstuff for preservation and dressing for human consumption. It is also used as basic substance as a fungicide, bactericide and herbicide.

Regarding the impact on human health, no concern has been highlighted with regard to ingestion of vinegar as residue in food. However, a potential concern of vinegar exposure through inhalation (spraying) should be assessed against the Acceptable Operator Exposure Concentration (AOEC) of 1

mg/m³ previously established during the peer review of acetic acid (EFSA, 2013) and has not been addressed. Accordingly, the conclusion reached in 2017 remains unchanged; on the basis of the current assessment as presented by the applicants it is not possible for EFSA to judge if non-dietary exposure estimates according to the intended uses will exceed the AOEC of 1 mg/m³ (EFSA, 2017).

Considering the requested use in non-agricultural areas, and that the substance specification corresponds to food grade, an assessment of residues is not considered necessary.

The acetic acid in vinegar has the potential to contaminate groundwater (due to its very low soil adsorption). Groundwater exposure calculations for acetic acid from the requested uses of vinegar as a herbicide are not available but the potential for groundwater exposure consequent to the similar herbicide uses of acetic acid indicated that the legal parametric limit of 0.1 µg/L used for the assessment of groundwater exposure would be exceeded for the major acetic acid component of vinegar. Information was not provided that might be used for an environmental exposure assessment of the components of vinegar, except for the major component acetic acid.

Since no specific exposure estimations were provided, it is not possible to draw a conclusion for the proposed extension of use in relation to the risk to non-target organisms.

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1. Introduction

1.1. Background and Terms of Reference as provided by the requestor

Regulation (EC) No 1107/2009¹ (hereinafter referred to as 'the Regulation') introduced the new category of 'basic substances', which are described, among others, as active substances, not predominantly used as plant protection products but which may be of value for plant protection and for which the economic interest of applying for approval may be limited. Article 23 of the Regulation lays down specific provisions to identify a substance as a basic substance with a view to ensure that such active substances that do not have an immediate or delayed harmful effect on human and animal health nor an unacceptable effect on the environment can be approved as 'basic' and used for plant protection purposes. Vinegar is an active substance for which, in accordance with Article 23(3) of the Regulation, the European Commission received a first application from Institut Technique de L'Agriculture Biologique (ITAB) and Mairie de Paris for approval as a 'basic substance' of use in plant protection as a fungicide and bactericide in seed treatment and for disinfecting mechanical cutting tools. On 21 March 2014 the European Food Safety Authority (EFSA) was requested by European Commission to organise a consultation on the basic substance application submitted, to consult the applicant on the comments received, and to deliver its scientific views on the specific points raised in the format of a reporting table. A Technical Report containing the finalised reporting table was issued by EFSA on 31 July 2014 (EFSA, 2014). In May 2017, the European Commission received a further application from Charbonneaux - Brabant S.A. for the extension of use of the basic substance vinegar as a herbicide in plant protection and subsequently a Technical Report containing the finalised reporting table was adopted by EFSA on 4 August 2017 (EFSA, 2017).

Vinegar has been approved on 1 July 2015 by Commission Implementing Regulation (EU) 2015/1108², in accordance with Article 23 of Regulation (EC) No 1107/2009, for the uses as a fungicide and bactericide, and subsequently, the conditions of approval has been amended by Commission Implementing Regulation (EU) No 2019/149³ to allow uses also as a herbicide.

In November 2018, the European Commission received a further application from Charbonneaux - Brabant S.A. and Greenpharma S.A.S. for the extension of use of the basic substance vinegar as a herbicide in plant protection for non-agricultural areas.

Following a specific mandate received on 1 October 2019, EFSA organised a consultation with Member States on the basic substance application for the approval of the additional extension of use of vinegar, which was conducted via a written procedure in June – August 2019. The comments received, including EFSA's comments, were consolidated by EFSA in the format of a reporting table. Subsequently, the applicants were invited to address the comments in column 4 of the reporting table and to provide an application update as appropriate. The comments received and the response of the applicants thereon, together with the application update submitted by the applicants, were considered by EFSA in column 5 of the reporting table.

The current report aims to summarise the outcome of the consultation process organised by EFSA on the basic substance application for approval of vinegar for the extension of use as a herbicide in plant protection for non-agricultural areas, and to present EFSA's scientific views on the individual comments received in the format of a reporting table.

The applications and, where relevant, any update thereof submitted by the applicants for approval of the extension of use of vinegar as a 'basic substance' in the context of Article 23 of the Regulation, are key supporting documentation, therefore they are considered as a background documentation to this report and will also be made publicly available, excluding its appendices (Charbonneaux - Brabant, 2018, 2019; Greenpharma S.A.S, 2018, 2019).

1 Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC. OJ L 309, 24.11.2009, p. 1-50.

2 Commission Implementing Regulation (EU) 2015/1108 of 8 July 2015 approving the basic substance vinegar in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council concerning the placing of plant protection products on the market, and amending the Annex to Commission Implementing Regulation (EU) No 540/2011. OJ L 181, 9.7.2015, p. 75.

3 Commission Implementing Regulation (EU) 2019/149 of 30 January 2019 amending Implementing Regulations (EU) 2015/1108 and (EU) No 540/2011 as regards the conditions of use of vinegar as a basic substance. OJ L 27, 31.1.2019, p. 20–22.

1.2. Interpretation of the Terms of Reference

On 6 March 2013 the European Commission requested EFSA to provide scientific assistance with respect to the evaluation of applications received by the European Commission concerning basic substances. By a further specific request, received by EFSA on 1 October 2019, EFSA was asked to organise a consultation on the basic substance application for an extension of use of vinegar as a herbicide in plant protection for non-agricultural areas, to consult the applicants on the comments received, and to deliver its scientific views on the specific points raised in the format of a reporting table.

To this end, a technical report containing the finalised reporting table is being prepared by EFSA. The agreed deadline for providing the finalised report is 2 January 2020.

On the basis of the reporting table, the European Commission may decide to further consult EFSA to conduct a full or focussed peer review and to provide its conclusions on certain specific points.

2. Assessment

The comments received on the basic substance application for extension of use of vinegar as a herbicide in plant protection for non-agricultural areas and the conclusions drawn by EFSA are presented in the format of a reporting table.

The comments received are summarised in columns 2 and 3 of the reporting table. The applicant's considerations of the comments, where available, are provided in column 4, while EFSA's scientific views and conclusions are outlined in column 5 of the table.

The finalised reporting table is provided in Appendix A of this report. In addition, an overview table on the identity and biological properties of the substance and the list of intended uses in plant protection (GAP table) are provided in Appendix B and C, respectively.

Documentation provided to EFSA

1. Charbonneaux - Brabant, 2018. Basic substance application on vinegar submitted in the context of Article 23 of Regulation (EC) No 1107/2009. November 2018. Documentation made available to EFSA by the European Commission.
2. Charbonneaux - Brabant, 2019. Basic substance application update on vinegar submitted in the context of Article 23 of Regulation (EC) No 1107/2009. November 2019. Documentation made available to EFSA by the applicant.
3. Greenpharma S.A.S, 2018. Basic substance application on vinegar submitted in the context of Article 23 of Regulation (EC) No 1107/2009. November 2018. Documentation made available to EFSA by the European Commission.
4. Greenpharma S.A.S, 2019. Basic substance application on vinegar submitted in the context of Article 23 of Regulation (EC) No 1107/2009. October 2019. Documentation made available to EFSA by the applicant.

References

EFSA (European Food Safety Authority) 2013. Conclusion on the peer review of the pesticide risk assessment of the active substance acetic acid. EFSA Journal 2013;11(1):3060. 57 pp. doi:10.2903/j.efsa.2013.3060.

EFSA (European Food Safety Authority), 2014. Outcome of the consultation with Member States and EFSA on the basic substance application for vinegar as a fungicide and bactericide in seed treatment and for disinfecting mechanical cutting tools. EFSA Supporting Publication 2014; 11(8):EN-641. 37 pp. doi:10.2903/sp.efsa.2014.EN-641

EFSA (European Food Safety Authority), 2017. Technical report on the outcome of the consultation with Member States and EFSA on the basic substance application for vinegar for extension of use in plant

protection asa herbicide. EFSA supporting publication 2017:EN-1281. 40pp.
doi:10.2903/sp.efsa.2017.EN-1281

Abbreviations

a.s.	active substance
AL	any other Liquid
AOEC	Acceptable Operator Exposure Concentration
BBCH	growth stage of mono- and dicotyledon plants
BSA	basic substance application
CAS	Chemical Abstracts Service
DT ₅₀	period required for 50% dissipation (define method of estimation)
EINECS	European Inventory of Existing Commercial Chemical Substances
EU	European Union
FOCUS	FORum for the Co-ordination of pesticide fate models
GAP	good agricultural practice
HQ	hazard quotient
MS	Member State
OECD	Organisation for Economic Co-operation and Development
PEC	predicted environmental concentration
PHI	pre-harvest interval
RMS	rapporteur Member State
TER	toxicity exposure ratio
TLV	threshold limit value

Appendix A – Collation of comments from Member States and EFSA on the basic substance application for extension of use of vinegar and the conclusions drawn by EFSA on the specific points raised

1. Purpose of the application

General					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
1(1)		ES: agree with the assessment		No comment from applicant	Addressed.

1.1 Name and address of applicants

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
No comments.					

2. Identity of the substance/product as available on the market and predominant use

General					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
2(1)	General	NL: Some information/data was written in French/Portuguese and could therefore not be fully evaluated. However it seems that sufficient information is provided to confirm the identity.		Most of the references are in English. French is legal language in EU. Abstract are furnished in English.	Addressed.

2.1. Identity and Physical chemical properties of the substance and product to be used

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
2(2)		ES: agree with the assessment		No comment from applicant	Addressed.

2.1.1. Common name of the substance and product and their synonyms/plant nomenclature

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.1.2. Chemical name with CAS, EEC and CIPAC numbers

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.1.3. Molecular and structural formula, molecular mass

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.1.4. Method or methods of manufacture of the substance and of the product

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.1.5. Description and specification of purity of the active substance and product

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
2(3)		EFSA: agrees that the specification of vinegar used should meet the FAO/WHO Codex alimentarius commission standard (CODEX STAN 162-1987) requirements.		No comment from applicant	Addressed: The specification of vinegar used should meet the FAO/WHO Codex Alimentarius Commission standard (CODEX STAN 162-1987) requirements.

2.1.6. Identity of inactive isomers, impurities and additives

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.1.7. Methods of analysis

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

2.2. Current, former and in case proposed trade names of substances/ products as put on the market

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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2(4)

ES: agree with the assessment

No comment from applicant

Addressed.

2.3. Manufacturer of the substance/products

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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2(5)

ES: agree with the assessment

No comment from applicant

Addressed.

2.4. Type of preparation of the substance/product

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
2(6)		ES: agree with the assessment		No comment from applicant	Addressed.

2.5. Description of the recipe for the product to be used

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
2(7)		ES: agree with the assessment		No comment from applicant	Addressed.

3. Uses of the substance and its product

3.1. Field of use

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
3(1)		ES: Considering that the requested use (non agricultural areas/weeds) is an extension of use of vinegar the application rate per treatment proposed seems to be acceptable.		No comment from applicant	Addressed.
3(2)		EFSA: except one, the links provided are no longer valid, the information is no longer accessible		Corrected in the updated BSA	Addressed.

3.2. Effects on harmful organisms or on plants

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
No comments.					

3.3. Summary of intended uses

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
3(3)	3.3 summary of intended uses.	NL: In the table with the summary of intended uses, the area of use should be more clearly described. "non agricultural areas" is a very broad term that could include home and garden use, but also forests, uncultivated land including hard surfaces, half open surfaces (porous asphalt, paving etc. Risks etc. may differ depending on the exact claims.		GAP Corrected in the updated BSA Details added	Addressed: The GAP table was updated in the revised submission.
3(4)	3.3 summary of intended uses. (GAP Table)	DK: Agree with NL comment: "In the table with the summary of intended uses, the area of use should be more clearly described. "non agricultural areas" is a very broad term that could include home and garden use, but also forests, uncultivated land including hard surfaces, half open surfaces (porous asphalt, paving etc. Risks etc. may differ depending on the exact claims. "		GAP Corrected in the updated BSA Details added	Addressed: The GAP table was updated in the revised submission.

3.3.1. As herbicide

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

4. Classification and labelling of the substance

Classification and labelling of the substance

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5. Impact on Human and Animal Health

5.1. Toxicokinetics and metabolism in humans

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.2. Acute toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.3. Short-term toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.4. Genotoxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.5. Long-term toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.6. Reproductive toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.7. Neurotoxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 4 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.8. Toxicity studies on metabolites

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.9. Medical Data: adverse effects reported in humans

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.10. Additional Information related to therapeutic properties or health claims

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.11. Additional information related to use as food

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.12. Acceptable daily intake, acute reference dose, acceptable operator exposure level

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

5.13. Impact on human and animal health arising from exposure to the substance or impurities contained in it

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
5(1)	5.13 (for both applicants)	NL: In this section, a concise risk assessment using UK POEM has been added. However, this assessment only addressed the exposure through the dermal route, whereas the inhalation exposure to acetic acid is	NL: a risk assessment on inhalation exposure during spray application of vinegar in non-agricultural areas should be added.	6% vinegar is regular vinegar use in kitchen, as food additive, without gloves, mask or protection. 6% vinegar is not like pure acetic acid producing vapour and inhalation concern.	No concern has been highlighted with regard to ingestion of vinegar as residue in food. The potential concern of using vinegar by inhalation (spraying) should be assessed against the AOEC of 1 mg/m ³

5.13. Impact on human and animal health arising from exposure to the substance or impurities contained in it					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
		<p>considered the most critical route of exposure. Therefore, both applicants are requested to provide a risk assessment comparing the exposure through inhalation during spray application in non-agricultural areas with the AOEC of acetic acid of 1 mg/m³ (EFSA Journal 2013;11(1):3060).</p>		<p>In water, acids dissociated, or less volatile than in pure state or at high concentration. Ref added in § 2</p>	<p>previously established during the peer review of acetic acid (EFSA, 2013) and has not been addressed. Accordingly, the conclusion reached in 2017 remains unchanged. On the basis of the current assessment as presented by the applicant it is not possible for EFSA to judge if non-dietary exposure estimates according to the intended uses will exceed the AOEC of 1 mg/m³ (EFSA, 2017). See also 5(2, 3), 9(2)</p>
5(2)	5.13 (for both applicants)	<p>DK: agree with NL: "In this section, a concise risk assessment using UK POEM has been added. However, this assessment only addressed the exposure through the dermal route, whereas the inhalation exposure to acetic acid is considered the most critical route of exposure. Therefore, both applicants are requested to provide a risk</p>	See 5(1)	<p>Vinegar is a foodstuff. At 6% concentration it produce only few smell of acids. Vinegar used in kitchen and even house cleaning is largely at higher concentration (up to 20%) and used by people daily without inhalation concern since products with 20% vinegar are still available. Ref added in § 2</p>	See 5(1)

5.13. Impact on human and animal health arising from exposure to the substance or impurities contained in it					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
		assessment comparing the exposure through inhalation during spray application in non-agricultural areas with the AOEC of acetic acid of 1 mg/m ³ (EFSA Journal 2013;11(1):3060). "			
5(3)	5.13 (for both applicants)	<p>EFSA: The active substance in vinegar, i.e. acetic acid was already approved as an herbicide.</p> <p>As previously commented by EFSA, (EFSA, 2014) and Member States (see comment 5(1,2)) considering the inhalation toxicity effects of acetic acid in humans, vinegar could be considered as a substance of concern.</p> <p>Non-dietary exposure estimates to acetic acid in vinegar should be provided according to the intended uses as herbicide, where inhalation exposure is the main route of concern.</p>	See 5(1)	<p>COMMISSION IMPLEMENTING REGULATION (EU) 2019/149 of 30 January 2019 amending Implementing Regulations (EU) 2015/1108 and (EU) No 540/2011 as regards the conditions of use of vinegar as a basic substance.</p> <p>Vinegar is a foodstuff, not a toxic for humans.</p> <p>Inhalation occurs with high concentration acetic acid 20-99%. Vinegar in areas is only detectable in air but do not conduct to inhalation concern.</p>	See 5(1)

6. Residues

Residues					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
6(1)		ES: Considering the requested use (non agricultural areas) and the fact that the substance has food grade, an assessment of residues is not considered necessary		This application is an extension based on an approved basic substance, specifications cannot be changed. Food grade is also required for the natural substance qualification.	Addressed.

7. Fate and Behaviour in the environment

7.1 Fate and Behaviour in the environment

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
7(1)		<p>ES: Considering that:</p> <p>(1) Acetic acid is the main active component of vinegar and is naturally occurring in environment.</p> <p>(2) The worst case formulation made of VINEGAR solution is constituted of 20% acetic acid in water, 30% vinegar in the preparation (60g/L acetic acid as main A.S).</p> <p>(3) VINEGAR solution is intended to be used in fields for plant protection for weeds CONTROL as herbicide (desiccant against weed) for non-agricultural areas and some restricted agricultural area.</p> <p>The application rate per treatment proposed for extended uses seems to be acceptable.</p>		<p>(1) Other acids are present including propionic</p> <p>(2) 6% = 60 g/L indeed No Spirit Vinegar</p> <p>(3) Vinegar is already allowed in fields for weed control for some Usages, this extension is for non-agricultural areas</p> <p>No comment from applicant</p>	Addressed
7(2)	Section 7	NL: Please refer to NL comments in the outcome of the		Agricultural uses are already allowed at 10%.	Groundwater contamination is indicated with the available

7.1 Fate and Behaviour in the environment

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
		<p>consultation with MS and EFSA of 2017 (EFSA Supporting publication 2017:EN-1281). In the new application for the extension of use to non-agricultural uses, the potential risks identified for surface water and groundwater during the previous commenting phase are not resolved. The same comments for the environmental fate and behaviour regarding these risks therefore apply to the current application.</p>		<p>Vinegar is Easily degradable (OECD test 301). Ref added in the updated BSA</p>	<p>FOCUS groundwater modelling from the herbicide uses. PEC in surface water have not been calculated for the herbicide uses being requested. In the EFSA conclusion on acetic acid (EFSA, 2013) a risk to aquatic organisms was identified based on similar use rates as the current intended use.</p>
7(3)	Section 7	<p>DK: Agree with the NL comment. "Please refer to NL comments in the outcome of the consultation with MS and EFSA of 2017 (EFSA Supporting publication 2017:EN-1281). In the new application for the extension of use to non-agricultural uses, the potential risks identified for surface water and groundwater during the previous commenting phase</p>		<p>Vinegar is Easily degradable (OECD test 301). Ref added in the updated BSA</p>	<p>See comment 7(2).</p>

7.1 Fate and Behaviour in the environment					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
		are not resolved. The same comments for the environmental fate and behaviour regarding these risks therefore apply to the current application."			
7(4)	Section 7	EFSA: Agree with the NL comment. "Please refer to NL comments in the outcome of the consultation with MS and EFSA of 2017 (EFSA Supporting publication 2017:EN-1281). In the new application for the extension of use to non-agricultural uses, the risks identified for surface water and groundwater during the previous commenting phase have not been resolved. The same comments for the environmental fate and behaviour regarding these risks therefore apply to the current application."		Idem See above	See comment 7(2).

7.2 Estimation of the short and long-term exposure of relevant environmental media (soil, groundwater, surface water)					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
7(5)	Rate of degradation in soil	ES: Fast soil degradation. Acetate may be produced naturally in anaerobic soil.		No comment from applicant	Addressed
7(6)	Rate of degradation in water.	ES: There is no study available. Under environmental conditions acetic acid is not subjected to hydrolysis.		Described in the BSA, soil vinegar is produced by anaerobic cereal straws buried.	See comment 7(2).
7(7)	Section 7	NL: Please see NL comment 7(2).		Vinegar is Easily degradable (OEDC test 301). Ref added in the updated BSA	See comment 7(2).

8. Effects on non-target species

8. General

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(1)	General	NL: Please refer to NL comments in the outcome of the consultation with MS and EFSA of 2017 (EFSA Supporting publication 2017:EN-1281). Many of the data gaps were not addressed in the information submitted for the new extension.		New information provided Vinegar is Easily degradable (OECD test 301). Ref added in the updated BSA Vinegar is used in may compartments of Chapter § 8 and administrated to various animals, birds, fish and bees.	See comments 8(5) and 7(2).
8(2)	General	DK: We agree with NL; Please address all data gaps pointed out by MS/EFSA on previous occasion for this proposed extension of use as a basic substance herbicide. Please note that the active substance Acetic acid is not a low risk (or even potential low risk substance), therefore extensive exposure of the environment substance comparable with the active substance EU GAP, is likely not acceptable for a basic substance GAP.		Vinegar is also used as fertilizer. References updated in the BSA Status of acetic acid CAS: 64-19-7 98% concentrated [Danger, GHS hazard statements: H226, H314; GHS precautionary statements: P280, P305+351+338, P310] should not interfere with Vinegar CAS: 8028-52-2 a worldwide approved food stuff.	See comments 8(5) and 7(2).

8.1. Effects on terrestrial vertebrates

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(3)		ES: Due to the nature of the requested use and the known properties of acetic acid, the potential for exposure of non-target terrestrial organisms to Vinegar is expected to be low. Therefore, the risk associated with the use of this product at the requested application rates and use pattern is expected to be negligible.		No comment from applicant	See comments 8(5) and 7(2).
8(4)		ES: The reliable endpoints concluded as being appropriate for use in regulatory risk assessment, derived from the available studies and literature in the dossier.		No comment from applicant	See comments 8(5) and 7(2).
8(5)	General	EFSA: The risk assessment to non-target organisms for the representative uses was not presented.	EFSA: it is proposed to summarise the information provided in Hagner M. 2013 and discuss their relevance with respect to the representative uses.	Hagner 2013 conclusions detailed in §8 and §7.	Risk Quotients i.e. TER or HQ were reported in Hagner 2013 for wood vinegar indicating that the risk could not be excluded to aquatic and soil organisms. However, it is noted that these risk estimations are not specific for the intended use in the GAP.

8.1. Effects on terrestrial vertebrates					
No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
					<p>Since no specific exposure estimations were provided, it is not possible to draw a conclusion for the proposed extension of use. Furthermore, it is noted that critical areas for non-target organisms were identified for acetic acid in the EFSA conclusion (EFSA, 2013), for other uses.</p> <p>See comment 7(2). See comments 8(5) and 7(2).</p>
8(6)	8.1. EFFECTS ON TERRESTRIAL VERTEBRATES	NL: It is not clear which information can be used from the different references mentioned and a risk assessment is still missing.	<p>NL: Please provide a table with the endpoints available on the effect of acetic acid on terrestrial vertebrates. In the table consider the following information: Test item, Species, Test duration, Dose range, Endpoint, Observations, Reference.</p> <p>Subsequently, please perform a risk assessment as indicated in Birds and mammals EFSA guidance.</p>	An overall argument for chapter 8 has been provided.	

8.1.1. Vertebrates

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.1.2. Birds

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.2. Effects on aquatic organisms

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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8(7)		ES: Due to the nature of the requested use and the known properties of acetic acid, the potential for exposure of non-target aquatic organisms to Vinegar is expected to be low. Therefore, the risk associated with the use of this product at the requested application		Vinegar is used in aquatic living + ref	See comments 8(5) and 7(2).
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8.2. Effects on aquatic organisms

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
		rates and use pattern is expected to be negligible.			
8(8)	8.2. EFFECTS ON AQUATIC ORGANISMS	NL: It is not clear which information can be used from the different references mentioned and a risk assessment is still missing.	NL: Please provide a table with the endpoints available on the effect of acetic acid on aquatic organisms. In the table consider the following information: Test item, Species, Test duration, Dose range, Endpoint, Observations, Reference. Subsequently, please perform a risk assessment as indicated in EFSA guidance on aquatic organisms .	An overall argument for chapter 8 has been provided. Vinegar used in fish production: information provided in 8.2 since the first and initial application.	See comments 8(5) and 7(2).
8(9)	8.2. EFFECTS ON AQUATIC ORGANISMS	DK: Agree with NL; please provide a risk assessment.	DK: Please provide a risk assessment in accordance with the relevant EFSA GD.	An overall argument for chapter 8 has been provided. Vinegar used in fish production: information provided since the first and initial application.	See comments 8(5) and 7(2).

8.2.1. Acetic acid

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.3. Effects on bees and other arthropods species

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(10)	8.3. EFFECTS ON BEES AND OTHER ARTHROPODS SPECIES	NL: It is not clear which information can be used from the different references mentioned and a risk assessment is still missing.	NL: Please provide a table with the endpoints available on the effect of acetic acid on bees and other non-target arthropods. In the table consider the following information: Test item, Species, Test duration, Dose range, Endpoint, Observations, Reference. Subsequently, please perform a risk assessment as indicated in EFSA bee guidance and for non- target arthropods SANCO/10329/2002 rev 2 final	An overall argument for chapter 8 has been provided. Vinegar used in beekeeping: information provided since the first and initial application. More references added.	See comments 8(5) and 7(2).
8(11)	8.3. EFFECTS ON BEES AND OTHER ARTHROPODS SPECIES	DK: Agree with NL; please provide a risk assessment.	DK: Please provide a risk assessment in accordance with the relevant EFSA GD.	idem	See comments 8(5) and 7(2).

8.3.1. Bees

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.3.2. Other arthropods

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.4. Effects on earthworms and other soil macroorganisms

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

8.5. Effects on soil microorganisms

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(12)		ES: soil degradation accepted		No comment from applicant	See comments 8(5) and 7(2).
8(13)		ES: Based on the available data, the risk to earthworms from the representative use was assessed as low.		No comment from applicant	See comments 8(5) and 7(2).

8.5.1. Acetic acid

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
No comments.					

8.6. Effects on other non-target organisms (flora and fauna)

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(14)	8.6. EFFECTS ON OTHER NON-TARGET ORGANISMS	NL: It is not clear which information can be used from the different references	NL: Please provide a table with the endpoints available on the effect of acetic acid on non-target plants. In the table	More references added on vinegar used as fertilizer.	See comments 8(5) and 7(2).

8.6. Effects on other non-target organisms (flora and fauna)

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
	(FLORA AND FAUNA)	mentioned and a risk assessment is still missing.	consider the following information: Test item, Species, Test duration, Dose range, Endpoint, Observations, Reference. Subsequently, please perform a risk assessment for non-target plants as indicated in SANCO/10329/2002 rev 2 final		
8(15)	8.6. EFFECTS ON OTHER NON-TARGET ORGANISMS (FLORA AND FAUNA)	DK: Agree with NL; please provide a risk assessment.	DK: Please provide a risk assessment in accordance with the relevant EFSA GD.	Full assessment in the context of a basic substance and a non-market authorization context. Most of the uses are already ongoing in cities although not covered actually.	See comments 8(5) and 7(2).

8.7. Effects on biological methods of sewage treatment

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
8(16)		ES: the risk to sewage treatment plants for the representative uses could be considered as low		No comment from applicant	See comments 8(5) and 7(2).

9. Overall conclusions with respect of eligibility of the substance to be approved as basic substance

Overall conclusions with respect of eligibility of the substance to be approved as basic substance

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
9(1)		ES agrees with the assessment			-
9(2)	9. Overall	DK: Please delete the following sentence: <i>As an approved basic substance Vinegar fulfils all criteria, this application is only a use extension.</i> Or change it to something like this: <i>As an approved basic substance Vinegar fulfils all criteria regarding the inherent properties.</i> The reason for this is that as the proposed extension is for a considerable use as a sprayed herbicide, whereas the current approved uses as a basic substance are negligible in comparison both with regard to environmental and human exposure.	DK: Please delete or update the text as proposed.	BSA corrected	See 5(1)

10. Other comments

Other comments

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA	Column 3 Proposal by Member States/EFSA on how the application should be updated to address the comment	Column 4 Follow up response from applicant	Column 5 EFSA's scientific views on the specific points raised in the commenting phase conducted on the application
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No comments.

Appendix B – Identity and biological properties

Common name (ISO)	there is no ISO common name for this substance
Chemical name (IUPAC)	acetic acid (main active substance)
Chemical name (CA)	acetic acid
Common names	vinegar
CAS No	90132-02-8
CIPAC No and EEC No	290-419-7 (EINECS)
FAO specification	none
Minimum purity	Food grade containing a maximum of 10 % acetic acid
Relevant impurities	none
Molar mass and structural formula	<p>Not relevant (Acetic acid:</p> $\begin{array}{c} \text{H}_3\text{C} \quad \text{OH} \\ \quad \quad \diagdown \quad / \\ \quad \quad \text{C} \\ \quad \quad \\ \quad \quad \text{O} \end{array}$ <p>Mw: 60.05 g/mol)</p>
Mode of Use	spray
Preparation to be used	any other liquid (AL)
Function of plant protection	herbicide

Appendix C – List of extension of uses

Crop and/or situation (a)	Member State for use	Example product name as available on the market	F G I (b)	Target (c)	Product**		Application				Application rate per treatment			Total rate	PHI (days) (m)	Remarks (**)
					Type (d-f)	Conc of a.i. g/kg (i)	Method kind (f-h)	Growth stage and season** (j)	Number min max (k)	Interval between applications (min)	kg a.i./hl min max (kg/ha)	Water l/ha min max	kg a.i./ha min max (kg/ha) (l)			
non-agricultural areas gravel driveways, sidewalks, paving, terrace	MS France	Vinegar	F	Weed	Any other liquid (AL)	100*	Spray *	Not applicable	1 to 2	7 to 21 days	6	1000	60	60 to 120	None: Not applicable	Temp > 20°C ** phytotoxic to plant, may kill the young plants

* Of main active substance acetic acid.

** Treatments must be delayed 24-48 hours or more after rain

- * For uses where the column „Remarks. As above or other conditions to take into account
- (a) For crops, the EU and Codex classification (both) should be taken into account; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), greenhouse application (G) or indoor application (I)
- (c) e.g. pests as biting and suckling insects, soil born insects, foliar fungi, weeds or plant elicitor
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR) etc..
- (e) GCPF Codes – GIFAP Technical Monograph N° 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench

- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant,
- (i) g/kg or g/L. Normally the rate should be given for the active substance (according to ISO)
- (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
- (k) Indicate the minimum and maximum number of application possible under practical conditions of use
- (l) The values should be given in g or kg whatever gives the more manageable number (e.g. 200 kg/ha instead of 200 000 g/ha or 12.5 g/ha instead of 0.0125 kg/ha)
- (m) PHI - minimum pre-harvest interval between the plant – type of equipment used must be indicated