

## Comments on CLH dossier – 24-Epibrassinolide

### Physical/Chemical Properties; Data on application and efficacy; Further Information; Methods of Analysis

#### CLH Report, chapter 1.5.1, page 12 to 14, Application rate per treatment

Applicant: Please correct the application rate in column 12. A concentration of 1.5 mg a.s. / hL is not given in the GAP. The maximum rate is 0.1% (see below) which is equal to 0.4 L product / 4 hL water. With a concentration of 0.1 g a.s. / L product, the highest concentration of the active substance is 10 mg a.s. / hL. Therefore, please correct the application rates in column 12 and 14 as follows:

	Application rate per treatment			
	kg a.s. /hL min-max (l)	Water L/ha min-max	kg a.s./ha min-max (l)	
wine grapes and table grapes Elicitor	5 mg a.s./hL	200 -1000	0.01-0.05 g/ha	Dilution rate: 1:2000
wine grapes and table grapes Plant activator	3.3-5 mg a.s./hL	200 -1000	0.0066-0.05 g/ha	Dilution rate: 1:2000 to 1:3000
Leaf vegetable Elicitor G,F	10 mg a.s./hL	200 - 400	0.02-0.04 g/ha	Dilution rate: 1:1000
Sugarbeet Elicitor	5 mg a.s./hL	200-800	0.01-0.04 g/ha	Dilution rate: 1:2000
Cucurbits Plant activator	3.3 - 5 mg a.s./hL	200-1000	0.0066-0.05 g/ha	Dilution rate: 1:2000 to 1:3000

#### CLH Report, chapter 2.2.2, page 22, persistence of foaming

Applicant: The maximum concentration according to the GAP is NOT 0.25%. The product is diluted in varying ratios depending on the crop canopy size (1:1000 – 1:3000, see last column in the GAP). The maximum concentration according to the GAP is 0.4 L product / 400 L water (0.1%; corresponding to a maximum active substance concentration of 10 mg / hl water). The persistent foaming test by Gao, J. (2016), Report No: NC-2015-034 (219-001), CP 2.8.2/01 was therefore conducted at the highest intended application rate according to the GAP (0.1%). Thus, the study is acceptable and there is no data gap.

### Ecotoxicology

#### CLH Report, chapter 2.9.3, page 51, Summary of effects on Arthropods (Table 30)

Applicant: Based on the comment provided below, the reproduction ER50 for *T. pyri* is > 3500 g a.s./ha. Thus, the concluding remark that chronic risk can't be fully excluded should be corrected. Acceptable risk to NTA was demonstrated.

Regarding the RMS' recalculations of endpoints, it is unclear how an  $NOER_{reproduction} < 438$  mL product/ha was obtained and why the ER<sub>50</sub> could not be determined.

Based on the raw data and the formula provided by the test guideline Blümel et al. (2000) for

number of eggs per female, the mean values for reproduction and corresponding % reduction could not be reproduced.

$$R_{pr} = \frac{Ld10}{Fd7} + \frac{Ed10 + Ld13}{\left(\frac{Fd7 + Fd10}{2}\right)} + \frac{Ed13 + Ld14}{\left(\frac{Fd10 + Fd13}{2}\right)} + \frac{Ed14}{\left(\frac{Fd13 + Fd14}{2}\right)}$$

The applicant has confirmed results for eggs per female provided in Table 9-5. As example for discrepancy, individual values for offspring/female per replicate indicated by the RMS' provided graph assume approximately 0.6, 4.0 and 4.7 offspring per female at the highest test rate (3500 mL/ha). This is in contrast to recalculated values of 3.5, 5.4, and 6.2 eggs/female for each replicate at this test rate, which is also reported in the study report.

Thus, the applicant is of the opinion that the values presented in Table 9-5 are correct and consequently no effect on reproduction > 50% was shown in the test. The resulting reproduction  $ER_{50}$  of the test is > 3500 g a.s./ha.