TECHNICAL REPORT

APPROVED: 20 January 2017

doi:10.2903/sp.efsa.2017.EN-1172

Outcome of the consultation with Member States and EFSA on the basic substance application for (sea) salt (sodium chloride) for use in plant protection as fungicide and insecticide

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 applications for (sea) salt (sodium chloride) 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 sea salt (sodium chloride) and an application for salt (sodium chloride) as a basic substance for use in plant protection as fungicide and insecticide. The current report summarises the outcome of the consultation process organised by EFSA and presents EFSA's scientific views on the individual comments received.

© European Food Safety Authority, 2017

Keywords: sea salt, sodium chloride, basic substance, application, consultation, plant protection, pesticide, fungicide, insecticide

Requestor: European Commission

Question number: EFSA-Q-2016-00672

Correspondence: pesticides.peerreview@efsa.europa.eu

Suggested citation: 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 (sea) salt (sodium chloride) for use in plant protection as fungicide and insecticide. EFSA supporting publication 2017:EN-1172. 56 pp. doi:10.2903/sp.efsa.2017.EN-1172

ISSN: 2397-8325

© European Food Safety Authority, 2017

Reproduction is authorised provided the source is acknowledged.

Summary

(Sea) salt (sodium chloride) is an active substance for which, in accordance with Article 23(3) of Regulation (EC) No 1107/2009, the European Commission originally received two applications, respectively from Institut Technique de l'Agriculture Biologique (ITAB) on sea salt (sodium chloride) and from Agriculture and Horticulture Development Board (AHDB) on salt (sodium chloride) for approval 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. By a further specific request, received from the European Commission in October 2016, EFSA was asked to organise a consultation on the basic substance applications for salt and sea salt (sodium chloride), 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 within three months of acceptance of the specific request.

A consultation organised by EFSA on the two original basic substance applications submitted for salt and sea salt respectively, was conducted with Member States via a written procedure in July-September 2016. Subsequently, EFSA also provided comments and the applicants were 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 provided application update represents both applications unified under the basic substance application for (sea) salt (sodium chloride).

The current report summarises the outcome of the consultation process organised by EFSA on the basic substance applications for salt and sea salt (sodium chloride) and presents EFSA's scientific views on the individual comments received in the format of a reporting table, one for salt (sodium chloride) and one for sea salt (sodium chloride) respectively.

The basic substance (sea) salt (sodium chloride) should be of food grade quality sodium chloride with a minimum purity of 970 g/kg.

(Sea) salt (sodium chloride) is intended to be used as a fungicide by foliar spray applications on grapevine and by spot treatment on mushrooms and as an insecticide by foliar spray applications on grapevine.

(Sea) Salt is generally used as food additive. No toxicological concern is expected from the use of salt/sea salt according to the proposed uses provided that (sea) salt is 'food grade' quality, with controlled levels of contaminants of concern, such as arsenic, mercury, lead, cadmium and copper.

Similarly, residues from the use of food grade salt in plant protection are not considered of concern for the consumer.

The information in the application has not addressed the potential for negative impacts on soil fertility / soil structure / crop safety from all the uses requested or on plant germination in compost derived from mushroom production that is subsequently used as growing media or spread on agricultural / horticultural land.

The potential effects on the soil organisms following the exposure to (sea) salt still need to be addressed for all uses. For the use on grapevine the information available in the application is considered as not sufficient to address the risk for non-target organisms with the exception of biological methods of sewage treatment.

Table of contents

European Food Safety Authority (EFSA) 1
Abstract 1
Summary 3
1. Introduction 5
1.1. Background and Terms of Reference as provided by the requestor 5
1.2. Interpretation of the Terms of Reference 5
2. Assessment 6
Documentation provided to EFSA 6
Abbreviations 7
Appendix A – Collation of comments from Member States and EFSA on the basic substance application for Salt and the conclusions drawn by EFSA on the specific points raised 8
Appendix B – Collation of comments from Member States and EFSA on the basic substance application for Sea Salt and the conclusions drawn by EFSA on the specific points raised 31
Appendix C – Used compound codes 52
Appendix D – Identity and biological properties 53
Appendix E – List of uses 54

1. Introduction

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

Regulation (EC) No 1107/2009[1] (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.

(Sea) salt (sodium chloride) is an active substance for which, in accordance with Article 23(3) of the Regulation, the European Commission received an application from ITAB and AHDB for approval as a 'basic substance' for use in plant protection as fungicide and insecticide.

The European Food Safety Authority (EFSA) organised a consultation with Member States on the two basic substance applications originally received, respectively for salt and sea salt, which was conducted via a written procedure in July-September 2016. The comments received, including EFSA's comments, were consolidated by EFSA in the format of a reporting table, one for each application. 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 provided application update represents both applications unified under the basic substance application for (sea) salt (sodium chloride). 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 applications for salt and sea salt (sodium chloride) 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 (sea) salt (sodium chloride) as a 'basic substance' in the context of Article 23 of the Regulation, are a key supporting documentation, therefore these are considered as background documentation to this report and will also be made publicly available, excluding its appendices (AHDB, 2016; ITAB, 2016; ITAB/AHDB 2016).

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 25 October 2016, EFSA was asked to organise a consultation on the basic substance applications for salt and sea salt (sodium chloride), 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, one for each application.

To this end, a technical report containing the finalised reporting tables is being prepared by EFSA. The agreed deadline for providing the finalised report is 25 January 2017.

On the basis of the reporting tables, 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.

[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. Assessment

The comments received on the basic substance applications for salt and sea salt (sodium chloride) and the conclusions drawn by EFSA are presented in the format of a reporting table, one for each application.

The comments received are summarised in columns 2 and 3 of the reporting tables. 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 tables.

The finalised reporting tables, as referring to the original separated applications for salt and sea salt, are provided in Appendix A and B 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 D and E, respectively.

Documentation provided to EFSA

1. AHDB, 2016. Basic substance application on salt submitted in the context of Article 23 of Regulation (EC) No 1107/2009. June 2016. Documentation made available to EFSA by the European Commission.

2. ITAB, 2016. Basic substance application on sea salt submitted in the context of Article 23 of Regulation (EC) No 1107/2009. July 2016. Documentation made available to EFSA by the European Commission.

3. ITAB/AHDB, 2016. Basic substance application update on sea salt (sodium chloride) submitted in the context of Article 23 of Regulation (EC) No 1107/2009. October 2016. Documentation made available to EFSA by the applicant.

Abbreviations

a.s.	active substance
GAP	good agricultural practice
IC	Ion chromatography
ICP-OES	inductively coupled plasma optical emission spectrometry
MS	Member State

Appendix A – Collation of comments from Member States and EFSA on the basic substance application for Salt 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: No comments			Noted.
1(2)		NL: No comments			Noted.
1(3)	2. Identity of the substance, p.5	EFSA: if the definition of "salt" in the submission is "salt produced from the evaporation of seawater or from mines" it is not clear why there is another basic substance called sea salt?		Clarified. Unification of Basic Substance Application salt dossiers	Addressed: The two submissions were unified in one
1(4)	2.1.4 Method of manufacture, p.6	EFSA: according to this paragraph, salt is sea salt, as it is produced from the evaporation of seawater	It is proposed to have just one basic substance, as the salt and sea salt are identical	Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: The two basic substance applications were unified. The salt should be food grade quality.

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

2.1. Identity and Physical and 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(1)		ES: No comments			Noted.
2(2)	IDENTITY AND PHYSICAL CHEMICAL PROPERTIES OF THE SUBSTANCE AND PRODUCT TO BE USED	NL: The description as brine indicates that the product will be used in a watery solution. Section 3.4.1 indicated the salt wil be used as a granule. Please change the identity to salt.		Corrected in Basic Substance Application.	Addressed.
2(3)	DETERMINATION OF SODIUM CHLORIDE CONTENT	NL: The determination of sodium and chloride content is described on the basis of the determination of impurities. The direct determination of sodium and chloride conent directly is possible and should be described.		Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: No direct method for the determination of NaCl content is submitted, however the ICP-OES and IC methods referred to in the CX/MAS 12/33/4[2] are acceptable international methods.
2(4)	2.1.7.1. Methods of analysis for determination of the active substance as manufactured	NL: The method of sampling has been described, however, the method and principle of the actual analytical method should also be described.		Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: See comment 2(3)
2(5)	2.1.1	DE: The basic substance should not be named only "salt" as there are different kind of	It is proposed to name the substance "salt (sodium chloride)".	Clarified. Unification of BSA salt dossiers	Addressed: See comments 1(3), 1(4)

[2] Codex Committee on Methods of Analysis and Sampling (CCMAS), 2012. Joint FAO/WHO standards programme. Endorsement of methods of analysis provisions in CODEX standards. Codex committee on methods of analysis and sampling Thirty-third Session, Budapest, Hungary, 5 - 9 March 2012, 4 CX/MAS 12/33/4.

2.1. Identity and Physical and 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**
		salts.			
2(6)	2.1.1	DE: "salt" and "sea salt" should be considered as one basic substance as they are both sodium chloride.	It is proposed to name the substances "salt (sodium chloride)".	Clarified. Unification of Basic Substance Application salt dossiers	Addressed: See comment 1(3), 1(4)
2(7)	2.1.5.2	DE: It is unclear which specification is intended for the present application. Several of the listed impurities (heavy metals) might be judged as relevant impurities due to their higher/more severe toxicity compared to sodium chloride. Currently, a toxicological evaluation of the specification is not possible.	Clarify which specification is supported for the present application.	Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: The salt should be of food grade quality. See comment 1(4)
2(8)	2.1.5.3	DE: The particle size of test material has an impact on the inhalable fraction and thus on the toxicological properties. According to the literature cited in chapter 3 (Fletcher and Gaze, 2008) it is recommended to use free-flowing salt (not the large crystal type).	Clarify the particle size of the active material. As a complete covering of the infected mushroom and substrate surface is necessary for a successful treatment the optimal size of the granules is important and should be given here, or at least in chapter 2.4 or 2.5 (recipe).		No additional information was presented concerning the particle size used in the treatment of mushrooms.

2.1. Identity and Physical and 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(9)	2.1.5.2 Contaminants, p.7	EFSA: it is not clear from the submission, how this specification is assured. A salt originating from the seawater doesn't necessarily comply with the CODEX Standard quality requirements.	It would be good to have a kind of process description, how the specified quality is assured	Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: The salt should be of food grade quality. See comment 1(4)
2(10)	2.1.5.2 Contaminants, p.7	EFSA: is there any possibility that the salt contain organic impurities originating from the seawater? Was this checked?		Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed: The salt should be of food grade quality. See comment 1(4)
2(11)	2.1.7.1 Methods of analysis, p. 11	EFSA: small typos in the formulas		Corrected	Addressed.

2.2. Current Former and in case proposed trade names					
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(12)		ES: No comments			Noted.
2(13)		NL: This is relevant (and should be easily filled with some entries)			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**
2(14)		ES: No comments			Noted.
2(15)		NL: This is relevant (and should be easily filled with some entries)		Corrected	Addressed.

2.4. Type of preparation					
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(16)		ES: No comments			Noted.
2(17)		DE: The optimal size of the granules is not given.	It should be added (see above).		See comment 2(8)

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(18)		ES: No comments			Noted.
2(19)		NL: No comments.			Noted.
2(20)	2.5 DESCRIPTION OF THE RECIPE FOR THE PRODUCT TO BE USED	NL: The table implies that a mixture of salt and soil will be used for treatment. Please indicate that the salt will be used directly as a granule.		Corrected	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(21)		DE: It is not clear what is meant by 0.03 g/kg given in the table. Presumably the dilution is the end dilution based on the total weight of the substrate. This is not the recipe. According to the photographs and cited literature the salt granules are spread directly on the surface of the mushrooms and substrate with a double radius around a spot of infection. According to the GAP table 80-100 g salt per application per spot are necessary.	This process should be described in detail here according to the comments in Column 2.	Corrected completed	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: Please, specify crops (mushrooms)		Corrected specific table for mushrooms	Addressed.
3(2)		NL: No comments.			Noted.
3(3)		DE: The abbreviation "ppe" is not explained.	It should be written in complete words.	Personal protective equipment Corrected	Addressed.
3(4)		DE: No literature and no studies are presented that demonstrate effects in the field of plant protection.	Studies should be added or if not possible at least it should be specified, in which field this method has proven or is expected to be successful.	Method is used Demand from Minor Uses corresponding responsible	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
3(5)		ES: No comments			Noted.
3(6)		NL: No comments.			Noted.

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(7)	3.4.1	ES: The information included in the GAP table regarding the Conc of the a.i. is different to the included in the point 2.5		GAP Corrected	Addressed.
3(8)	3.4.1	ES: Please review the units included in the "Application rate per treatment" and the value of 0.03 g/kg of substrate, included in the first column of this point.		GAP Corrected	Addressed.
3(9)		NL: No comments.			Noted.
3(10)		DE: The numeration of the chapters does not correspond to the numeration here: "Summary of intended uses" is chapter 3.4 in the Application.	The numeration should be adapted.	GAP Corrected	Addressed.
3(11)		DE: In the "Summary of intended uses" / GAP table not all abbreviations are explained.	The abbreviation ppe has to be explained.	Personal protective equipment Corrected	Addressed: See also comment 3(3)
3(12)		DE: Some values given in the GAP table are not clear: are they related to the a.i. in the salt or to ha or to one treated spot or to the total volume of the substrate?	The values given in column "Formulation" and "Application rate per treatment" should be revised and explained.	GAP Corrected	Addressed.
3(13)	3.4.1 Summary of intended uses,	EFSA: it is not clear what represents the number		GAP Corrected	Addressed.

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**
	p.16	0.0003 g in the column "Conc of a.i. g/kg. Is this not min 97%? The formulation is granule (GR).			
3(14)	3.4.1 Summary of intended uses, p.16	EFSA: the 80-100 g per application is slightly misleading in the column "g a.i./ha"	As the application is spot treatment, probably the amount is derived from the number and size of spots	GAP Corrected	Addressed.

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**
4(1)	4.1	DE: It is noted that the listed self-classifications qualify sodium chloride as substance of concern.		Basic Substance Application modified indicating this request	Addressed.
4(2)		NL: No comments.			Noted.

5. Impact on Human and Animal Health

NL: No comments.

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

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

No comments.

5.3. Short-term toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA		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.

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

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
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
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
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
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
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
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
5(1)		EFSA: provided that salt is "food grade" quality (with controlled levels of contaminants of concern, such as arsenic, mercury, lead, cadmium and copper), salt is generally used as food additive.		Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed.

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**
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**
No comments.					

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: No comments			Noted.
6(2)		NL: No comments.			Noted.
6(3)		EFSA: Residues of salt are not considered relevant with regard to this section provided that the salt used as a Plant Protection Product is comparable with salt used as an ingredient of food (aka sodium chloride, table salt,		Food grade compulsory. Unification of Basic Substance Application salt dossiers	Addressed.

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**
		cooking salt etc.) i.e. it does not contain unacceptable levels of natural contaminants or other impurities.			

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)	7.1 Fate and behaviour in the environment	NL: Could more information be provided regarding the effect of a salinity increase on soil organic matter or soil physicochemical properties, which may be relevant for mobility of existing soil contaminant?		Salt is collected after use. Only tiny amount is disseminated in soil.	The applicant has not addressed the amount of salt that ends up being spread on agricultural / horticultural crop land following the treatment of mushrooms or that which might reach soil when used in vineyards, that has the potential to have a negative impact on soil fertility /soil structure. The use of the description 'only tiny amount' is not helpful in this context.
7(2)	7.1 Fate and	EFSA: A discussion would be	Applicant to describe compost	Regarding quantities: there	See comment 7(1).

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**
	behaviour in the environment	appropriate of what happens to treated mushroom compost at the end of a growing cycle / disposal practice. Mushroom compost has a value as a fertiliser / soil conditioner and will usually be spread on land used for growing agricultural and horticultural crops. Possible implications for crop safety as a consequence of this practice should be discussed and addressed.	disposal practice and salt content that might result from the proposed use. Implications for crop safety to considered and addressed. (I.e. safety of crops subsequently cultivated on land where mushroom compost has been used as fertiliser, not for the mushroom crop).	are few mushroom growers per Member State. In the UK we have about 30 growers and a total of 85 hectares of mushrooms. Salt is collected after use.	In addition to the potential for negative impact on soil fertility /soil structure, the applicant has not addressed if there will be implications for crop safety / plant germination in compost derived from mushroom production.

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(3)	7.2 Estimation of short and long-term exposure of relevant env. media	NL: Is there any estimation of exposure of agricultural soils on which the spent mushroom compost might be applied?		Regarding quantities: there are few mushroom growers per Member State. In the UK we have about 30 growers and a total of 85 hectares of mushrooms.	See comments 7(1) and 7(2).

8. Effects on non-target species

NL: No comments

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(1)		ES: No comments			Noted.
8(2)	8. Effects on non-target species	EFSA: It is reported that 'mushrooms cultivation is dedicated to restricted area, not in field, used as local fungistatic dispersion in environment is unlikely to happen so contact with non-target species is unlikely to happen'. Could you please further substantiate the above e.g. better define the restricted areas dedicated to mushrooms cultivation? It is noted that in Section 3.4 'summary of the intended uses', it is indicated that the intended use is in greenhouse.	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to birds and mammals (acute and long-term). The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for non-target organisms.	During the production of mushrooms that is no exposure to non-target organisms. The mushrooms are grown in growing rooms. There are no windows and double doors. Due to very strict hygiene regimes it is not possible for non-target organisms to enter the growing facility. Following production the growing media is removed from the facility and generally put on to agricultural land under a waste exemption license. The amount of growing media per ha is low and we wouldn't anticipate an impact on birds etc..	Addressed
8(3)	Bollinger et al. 2005	EFSA: It is reported that 'passerines ingesting relatively small numbers of road salt granules or small quantities of highly concentrated NaCl solutions	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to birds (acute and long-term).	See above 8(2)	Addressed

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**
		are at risk of sodium poisoning'. See also 8(9).	The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for non-target organisms.		

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**
8(4)		ES: No comments			Noted.
8(5)	8. Effects on non-target species	EFSA: It is reported that 'mushrooms cultivation is dedicated to restricted area, not in field, used as local fungistatic dispersion in environment is unlikely to happen so contact with non-target species is unlikely to happen'. Could you please further substantiate the above e.g. better define the restricted areas dedicated to	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to aquatic organisms. The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for	See above 8(2)	Addressed

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
		mushrooms cultivation? It is noted that in Section 3.4 'summary of the intended uses', it is indicated that the intended use is in greenhouse. Please also clarify the disposal practice for the treated mushroom compost, see 7(2).	non-target organisms.		

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(6)		ES: No comments			Noted.
8(7)		EFSA: 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
8(8)		ES: No comments			Noted.
8(9)	8. Effects on non-	EFSA: It is reported that	Some form of risk assessment	See above 8(2)	The applicant has not

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**
	target species	'mushrooms cultivation is dedicated to restricted area, not in field, used as local fungistatic dispersion in environment is unlikely to happen so contact with non-target species is unlikely to happen'. Could you please further substantiate the above e.g. better define the restricted areas dedicated to mushrooms cultivation? It is noted that in Section 3.4 'summary of the intended uses', it is indicated that the intended use is in greenhouse. Please also clarify the disposal practice for the treated mushroom compost, see 7(2).	and/or scientific justification should be submitted in order to demonstrate a low risk to soil organisms. The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for non-target organisms.		addressed the amount of salt that ends up being spread on agricultural / horticultural crop land following the treatment of mushrooms which has the potential to have a negative impact on soil fertility /soil structure. The potential impact on the soil communities of the above has not been addressed. See also 7(1)
8(10)	Bryn et al. 2012	EFSA: This study was not performed with soil organisms but rather on salt water organisms. Could you please clarify why it is reported in this section? In addition, only an abstract of the paper is reported which does not include the main results of the study.		See above 8(2)	Addressed, the reference was removed.

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(11)		ES: No comments			Noted.
8(12)	8. Effects on non-target species	EFSA: It is reported that 'mushrooms cultivation is dedicated to restricted area, not in field, used as local fungistatic dispersion in environment is unlikely to happen so contact with non-target species is unlikely to happen'. Could you please further substantiate the above e.g. better define the restricted areas dedicated to mushrooms cultivation? It is noted that in Section 3.4 'summary of the intended uses', it is indicated that the intended use is in greenhouse. Please also clarify the disposal practice for the treated mushroom compost, see 7(2).	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to soil microorganisms. The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for non-target organisms.	See above 8(2)	The applicant has not addressed the amount of salt that ends up being spread on agricultural / horticultural crop land following the treatment of mushrooms which has the potential to have a negative impact on soil fertility /soil structure. The potential impact on the soil communities of the above has not been addressed. See also 7(1)
8(13)	Tokuz et al. 1978	EFSA: This study appears to be related more to the section 'Effects on biological methods of sewage treatment'.		Ref Moved	Addressed. The reference was moved to the Section 'Effects on biological methods of sewage treatment'.

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)		ES: No comments			Noted.
8(15)	Eaton, 1942	EFSA: It is reported that 'the salt constituents of irrigation water may affect plant growth adversely owing to their excessive accumulation in the soil and later in the plants or to changes in the physical and chemical characteristics of soils that impede water penetration or otherwise cause the soil environment to be less favourable as a medium for root development'. Please could you provide further information on the conditions of use of salt and the disposal practice for the mushrooms' compost? See also 7(2).	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to non-target plants. The assessment should consider the risk from salt when used according to the GAP. To address this issue the applicant might consider providing further information on the potential exposure for non-target organisms.	See above 8(2)	The applicant has not addressed the amount of salt that ends up being spread on agricultural / horticultural crop land following the treatment of mushrooms which has the potential to have a negative impact on soil fertility /soil structure. See also 7(1)

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: No comments			Noted.
8(17)		EFSA: Only a short summary of a literature study is presented. The possibility to use this	Some form of risk assessment and/or scientific justification should be submitted in order	Ref added Tokuz et al. 1978	Addressed. A study to address the effects of inorganic salts on the

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**
		study in the assessment should be further discussed in the application. In addition, any form of risk assessment/ scientific justification was not presented. It is, therefore, not possible to conclude on the effects on biological methods of sewage treatment	to address the effects on biological methods of sewage treatment. The assessment should consider the risk from salt when used according to the GAP.		biological methods of sewage treatment was included in the application.

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)	General comment	ES: According to the Commission Decision of 30 January 2004 concerning the non-inclusion of certain active substances in Annex I,[3] Salt should not be approved as basic substance.	ES: No more comments	Basic Substance Application corrected information added	This is considered a risk management issue and EFSA does not provide an opinion in relation to that.
9(2)		NL: No comments			Noted.

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**
10(1)		ES: No comments			Noted.
10(2)		NL: No comments			Noted.

[3] European Commission (EC), 2004. Commission Decision of 30 January 2004 concerning the non-inclusion of certain active substances in Annex I to Council Directive 91/414/EEC and the withdrawal of authorisations for plant protection products containing these substances. (2004/129/EC) .OJ L 37, 10.2.2004, p. 27–31.

Appendix B – Collation of comments from Member States and EFSA on the basic substance application for Sea Salt 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: Please, include the general conclusion in each section		Basic Substance Application corrected	Addressed.
1(2)		EFSA: It is proposed to have just one basic substance, as the salt and sea salt are identical		Basic Substance Application Dossiers joined: "Sea salt (sodium chloride)" unique	Addressed: The two submissions were unified in one

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

2.1. Identity and Physical and 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(1)		ES: No comments			Noted.
2(2)	2.1.1	DE: The basic substance should not be named only "Sea salt".	It is proposed to name the substance "sea salt (sodium chloride)" or "salt (sodium chloride)" (s. comment below).	Basic Substance Application Dossiers joined: "Sea salt (sodium chloride)" unique name	Addressed: The two basic substance applications were unified.
2(3)	2.1.1	DE: "salt" and "sea salt" should be considered as one basic	It is proposed to name the substances "salt (sodium	Basic Substance Application called: "Sea salt (sodium	Addressed: See also comments 1(2), 2(2)

2.1. Identity and Physical and 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**
		substance as they are both sodium chloride.	chloride)".	chloride)"	
2(4)	2.1.5.2	DE: It is unclear which specification is intended for the present application. Several of the listed impurities (heavy metals) might be judged as relevant impurities due to their higher/more severe toxicity compared to sodium chloride. Currently, a toxicological evaluation of the specification is not possible.	Clarify which specification is supported for the present application.	"Sea salt (sodium chloride)" should be linked to food grade specifications	Addressed: The sea salt should be food grade quality.
2(5)	2.1.5.3	DE: The particle size of test material has an impact on the inhalable fraction and thus on the toxicological properties.	Clarify the particle size of the active material.	Sea salt is a mixture of coarse salt.	Addressed.
2(6)	2.1.5.2 Contaminants, p.8	EFSA: it is not clear from the submission, how this specification is assured. A salt originating from the seawater doesn't necessarily comply with the CODEX Standard quality requirements.	It would be good to have a kind of process description, how the specified quality is assured	Food status required food grade status compulsory	Addressed: The salt should be of food grade quality.
2(7)	2.1.5.2 Contaminants, p.8	EFSA: is there any possibility that the salt contain organic		Food status compulsory, natural impurities are known	Addressed: See comment 2(6)

2.1. Identity and Physical and 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**
		impurities originating from the seawater? Was this checked?		and fully characterized.	
2(8)	2.1.7.1 Methods of analysis, p. 12	EFSA: small typos in the formulas		Corrected in Basic Substance Application	Addressed.

2.2. Current Former and in case proposed trade names					
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(9)		ES: No comments			Noted.

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**
2(10)		ES: No comments			Noted.

2.4. Type of preparation					
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(11)		ES: No comments			Noted.

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(12)		ES: No comments			Noted.

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: No comments			Noted.
3(2)		DE: The applicant proposes the use of NaCl against Powdery mildew and the grapevine moth. The literature cited does not sufficiently prove, that there are effects. Powdery mildew: there is only one short trial report in		No comment from applicant. Substance is used in fields and vineyards especially. This Basic Substance Application is to avoid illegal uses. May be DE M.S. allows illegal uses of unapproved substance but not FR M.S.	There were no additional data on efficacy in the updated application.

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**
		French which indicates a very slight efficacy. All other literature presented for "fungicide use" of sodium chloride is only about the effects of humidity on mildew development (Bendek et al., 2007; Carroll and Wilcox, 2003). In these trials sodium chloride is only used as means to adjust a certain relative humidity (RH) in a moist chamber and not relevant here. Grapevine moth: the only study presented by the applicant is about the effect of a combination of 3 % sodium silicate and 0.6 % NaCl. There is no evidence presented, that NaCl alone has any effect.		Desiccant properties as mentioned are indeed responsible for the Mode Of Action of this substance. Sodium silicate would be another dossier to submit separately.	
3(3)	3.1.1 Fungicide use, p.15	EFSA: the presented information is not a proof of the fungicidal activity of NaCl		No comment from applicant.	See comment 3(2)
3(4)	3.1 Field of use	EFSA: under this point no mention of use as insecticide, while under 3.2 insecticide used is		This substance is not a biocide. No biocide neither insecticidal effect is intended.	The presented data are insufficient to prove the insecticidal activity of salt.

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**
		mentioned. There is no evidence presented, that NaCl alone has any insecticidal effect			

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**
3(5)		ES: No comments			Noted.
3(6)		DE: See above sub-section (3.1)			Addressed.

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(7)		ES: No comments			Noted.
3(8)		DE: According to the only trial report cited by the applicant to prove effects against powdery mildew the highest concentration recommended in the GAP table can have a slight effect against the fungus (Constant, 2007). No	The applicant should address the problem of phytotoxicity.	Applicant agrees that 4% may be phytotoxic. Recommended uses are described in GAP at 2 % rate not at 4%. Only one application is recommended but in case of	Addressed.

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
		evidence was presented that lower concentrations can have any positive effect. On the other side higher concentrations than the recommended 2 % (4 %) applied onto the plant surface had strong phytotoxic effects (Constant, 2007).		high contamination in vineyards vine makers are subject to proceed to a second application with the minimum concentration (1%).	
3(9)	3.4.1 Summary of intended uses, p.16	EFSA: it is not clear what represents the number 6 to 20 g in the column "Conc of a.i. g/kg. Is this not min 97%? The formulation is an water soluble powder (SP)		Column "Conc of a.i. g/kg corrected. Formulation assigned.	Addressed.

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
4(1)	4.1	DE: It is noted that the listed self-classifications qualify sodium chloride as substance of concern.		Corrected in Basic Substance Application at point §9.	Addressed.

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
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
No comments.					

5.3. Short-term toxicity

No.	Column 1 Reference to Application Template	Column 2 Comments from Member States / EFSA		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.					

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
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
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
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
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
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
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
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
5(1)		EFSA: provided that salt is "food grade" quality (with controlled levels of contaminants of concern, such as arsenic, mercury, lead, cadmium and copper), salt is generally used as food additive.		Food grade status compulsory. Added in point §2.	Addressed: See also comments 2(4), 2(6)

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**
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**
No comments.					

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: No comments			Noted.
6(2)		EFSA: Residues of sea salt are not considered relevant with regard to this section provided that the salt used as a Plant Protection Product is comparable with salt used as an ingredient of food (aka sodium chloride, table salt, cooking salt etc.) i.e. it does		Applicant agrees. Application number is reduced to 2 per year. Second application is reduce to 1%. To be used in heavy mildew years (like 2016), not every year. Compulsory Food grade	Addressed.

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**
		not contain unacceptable levels of natural contaminants or other impurities.		status and corresponding specifications avoid any impurities.	

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)		ES: No comments			Noted.

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(2)		ES: No comments			Noted.
7(3)		EFSA: It should be considered if management practices necessary to ensure that salt levels in the root zone need to be described and proposed, to prevent crop		Application number is reduced to 2 per year. Second application is reduce to 1%. To be used in heavy mildew years (like 2016), not every	The applicant has not addressed with any data whether this reduced amount or frequency of use might result in levels that might reach soil, that has the

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**
		safety issues becoming a concern, when the treatment is used in consecutive years.		year.	potential to have a negative impact on soil fertility /soil structure / crop safety.

8. Effects on non-target species

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(1)		ES: No comments			Noted.
8(2)	8.1.1 Birds 8.1.2 Mammals	EFSA: Only short summaries of toxicity studies from literature are reported. It is not clear how the findings in these studies were considered in the assessment. Any form of risk assessment/ scientific justification was not presented. It's, therefore, not possible to conclude on the risk for birds and wild mammals.	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to birds and mammals (acute and long-term). The assessment should consider the risk from salt when used according to the GAP.	More reference added. Usual mono application Maximum total rate of salt should not overcome 6 kg / ha per year	Only short summaries of toxicity studies from literature are reported. Any form of risk assessment or scientific justification was not submitted. A maximum application rate of 6 kg/ha is proposed in the applicant response, however, an explanation on how this rate was calculated is missing. It is additionally noted that the GAP for the use as fungicide on grapevine was changed with respect to the original

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**
					application (maximum application rate lowered from 9 kg/ha to 6 kg/ha).

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**
8(3)		ES: No comments			Noted.
8(4)		EFSA: Only a short summary of a study on 'brine-induced mortality of non-indigenous invertebrates in ballast water' is reported. It is not clear how the findings in this study were considered in the assessment. Any form of risk assessment/ scientific justification was not presented. It's, therefore, not possible to conclude on the risk for aquatic organisms.	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to aquatic organisms. The assessment should consider the risk from salt when used according to the GAP.	More ref added. General consideration added in head of point §8. Maximum total rate of salt should not overcome 6 kg / ha per year	Only short summaries of toxicity studies from literature are reported. Any form of risk assessment or scientific justification was not submitted. A maximum application rate of 6 kg/ha is proposed in the applicant response, however, an explanation on how this rate was calculated is missing. It is additionally noted that the GAP for the use as fungicide on grapevine was changed with respect to the original

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**
					application (maximum application rate lowered from 9 kg/ha to 6 kg/ha).

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(5)		ES: No comments			Noted.
8(6)		DE: The applicant has not presented any literature concerning the harmlessness for bees.		Ref added	Only a short summary of a study on honey bee nutrition is reported. It is not clear how the findings in this study could be considered in the assessment. In addition to this an additional reference was added. The latter is not considered as sufficient to address the effects on bees.
8(7)		EFSA: Only a short summary of a study on honey bee nutrition is reported. It is not clear how the findings in this study could be considered in the assessment. Any form of risk assessment/ scientific justification was not	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to bees and other arthropods. The assessment should consider the risk from salt when used according to the	Ref added	See 8(6)

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
		presented. See also 8(6)	GAP.		

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
8(8)		ES: No comments			Noted.
8(9)		DE: As can be deducted from the literature presented by the applicant, earthworms are sensitive against sodium chloride. In the GAP table a maximal application rate of 9 kg/ha is recommended.	The applicant should address this problem and present a calculation about the salt load in the soil if sodium chloride is used regularly as proposed in the GAP table.	Maximum total rate of salt reduced, should not overcome 6 kg / ha per year. Limitations are included in GAP.	Any form of risk assessment or scientific justification was not submitted. A maximum application rate of 6 kg/ha is proposed in the applicant response, however, an explanation on how this rate was calculated is missing. It is additionally noted that the GAP for the use as fungicide on grapevine was changed with respect to the original application (maximum application rate lowered from 9 kg/ha to 6 kg/ha).
8(10)		EFSA: Only short summaries of a series of studies from literature (including grey	Some form of risk assessment and/or scientific justification should be submitted in order	Soil is naturally sodic. Excess of sodium chloride has negative impact.	See 8(9)

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
		literature) are presented. The possibility to use these studies in the assessment should be further discussed in the application. In addition, any form of risk assessment/ scientific justification was not presented. It is, therefore, not possible to conclude on the risk for soil organisms, see also 8(9)	to demonstrate a low risk to soil organisms. The assessment should consider the risk from salt when used according to the GAP.	Limitations are included in GAP. Ref added.	
8(11)	Bryn et al., 2012	EFSA: This study was not performed with soil organisms but rather on salt water organisms. Could you please clarify why it is reported in this section? In addition, only an abstract of the paper is reported which does not include the main results of the study.		Paper is complete (9 pages). Reference removed.	Addressed

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: No comments			Noted.
8(13)		EFSA: Only short summaries of a series of studies from literature are presented. The possibility to use these studies in the assessment should be further discussed in the application. In addition, any form of risk assessment/ scientific justification was not presented. It is, therefore, not possible to conclude on the risk for soil microorganisms, see also 8(9)	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to soil microorganisms. The assessment should consider the risk from salt when used according to the GAP.	More ref added. Microorganisms are sensible to salt.	Additional references were added in the application. The applicant concluded that microorganisms are 'sensible to salt'. However, any form of risk assessment or scientific justification was not submitted. It is additionally noted that salt has the potential to have a negative impact on soil structure and this may have an impact on the soil communities.
8(14)	Tokuz et al. 1978	EFSA: This study appears to be related more to the section 'Effects on biological methods of sewage treatment'.		Reference moved.	Addressed

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(15)		ES: No comments			Noted.

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(16)		EFSA: Only a short summary of a literature study is presented. The possibility to use this study in the assessment should be further discussed in the application. In addition, any form of risk assessment/ scientific justification was not presented. It is, therefore, not possible to conclude on the risk for non-target plants, see also 8(17)	Some form of risk assessment and/or scientific justification should be submitted in order to demonstrate a low risk to non-target plants. The assessment should consider the risk from salt when used according to the GAP.	More ref added	An additional reference was added. In this study the response of plant (*Hordeum* sp.) to saline substrate was assessed. However, in the absence of an estimation of the amount of salt which might reach soil when used according to the GAP, it is unclear how this study could be used in the assessment. An assessment of the risk to plants when salt is used according to the GAP is still missing.
8(17)	Eaton, 1942	EFSA: It is reported that 'the salt constituents of irrigation water may affect plant growth adversely owing to their excessive accumulation in the soil and later in the plants or to changes in the physical and chemical characteristics of soils that impede water penetration or otherwise cause the soil environment to be less favourable as a medium for root development'. How this study was considered in the assessment?		Salt constituents, as sodium chloride are known for adverse effect on flora (possibly herbicide as desiccant) but at higher rate compare to vineyards concentrations used. Low volumes are indeed recommended for the corresponding GAP.	See 8(16) It is additionally noted that the GAP for the use as fungicide on grapevine was changed with respect to the original application (Water l/ha changed from 200-300 l/ha to 200 l/ha).

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(18)		ES: No comments			Noted.
8(19)		EFSA: Only a short summary of a literature study is presented. The possibility to use this study in the assessment should be further discussed in the application. In addition, any form of risk assessment/ scientific justification was not presented. It is, therefore, not possible to conclude on the effects on biological methods of sewage treatment, see also 8(17)	Some form of risk assessment and/or scientific justification should be submitted in order to address the effects on biological methods of sewage treatment. The assessment should consider the risk from salt when used according to the GAP.	Salt is commonly used as deicing means (roads). Ion and salt increase has a negative impact on biological methods of sewage treatment.	Addressed. The potential for exposure to salt for sewage treatment organisms when salt is applied via foliar application (spray) is expected to be low.

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)	General comment	ES: According to the Commission Decision of 30 January 2004 concerning the non-inclusion of certain active substances in Annex I, Sea salt should	ES: No more comments	Ref added in point §9. It should be notified that sodium chloride is present in the DRAFT LIST OF POSSIBLE CANDIDATES FOR BASIC	This is considered a risk management issue and EFSA does not provide an opinion in relation to that.

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**
		not be approved as basic substance.		SUBSTANCES.	

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**
10(1)		ES: No comments			Noted.

Appendix C – Used compound codes

Code/trivial name	Chemical name/SMILES notation	Structural formula
Salt	Sodium chloride [Na+].[Cl-]	$Na^{+}Cl^{-}$

Appendix D – Identity and biological properties

Common name (ISO)	There is no ISO common name for this substance
Chemical name (IUPAC)	Sodium chloride
Chemical name (CA)	Sodium chloride
Common names	Salt, sea salt
CAS No	7647-14-5
CIPAC No and EEC No	231-598-3(EINECS/ELINCS)
FAO specification	Not available
Minimum purity	970 g/kg
Relevant impurities	none
Molecular mass and structural formula	$Na^{+}Cl^{-}$ (58.44 g/mol)
Mode of Use	Foliar spraying / Hand application
Preparation to be used	Water soluble powder (SP) Granule (GR)
Function of plant protection	Fungicide, insecticide

Appendix E – List of uses

Fungicide use

Crop and/or situation (a)	Member State or Country	Example product name as available on the market	FGI (b)	Pests or group of pests controlled (c)	Formulation		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)	g a.i./hl min max (g/hl)	Water l/ha min max	g a.i./ha min max (g/ha) (l)	g a.i./ha min max (g/ha) (l)		
Grapevine *Vitis vinifera*	France Not Relevant All MS	Not relevant	F	Fungi diseases Powdery mildews: *Erysiphe necator*	SP Water soluble powder *	>970	Foliar application spraying	From 1st shoots (BCH10) to cluster tightening (BBCH57) Spring to summer	1 to 2	-	600 to 2000	200	1200 to 4000	1200 to 6000 (n)	30	(n) (o) (p)

* Brackish water is the correct name of the final product
(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, between the plant – type of equipment used must be indicated
(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
(n): In case of 2 applications: one at 20 g/L + one at only10 g/L and ¥ compulsory
(o): Careful application should be controlled in terms of spray and target should be only the foliage. Low volumes are recommended in order to avoid spill. It is recommended not to spray every year, only in emergency cases.
(p): Maximum total rate of salt should not overcome 6 kg / ha per year

Crop and/or situation (a)	Member State or Country	Example product name as available on the market	FGI (b)	Pests or group of pests controlled (c)	Formulation		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)	g a.i./hl min max (g/hl)	Water l/ha min max	g a.i./ha min max (g/ha) (l)	g a.i./ha min max (g/ha) (l)		
Mushrooms like *Agaricus bisporus*	UK Not Relevant All MS	Not relevant	G	Fungal diseases like cobweb disease *Cladobotryum* strains (i.e. *Mycophilum*); Dry Bubble Disease *Lecanicillium (Verticillium) fungicola* Wet bubble disease *Mycogone perniciosa*	GR Granule	>970	Hand Trowel Cup Scoop	On finding the pathogen. No earlier than 16 days into grow cycle.	1	-	0.03g/kg of substrate	- Dry	80 to 100	80 to 100	-	Salt is used as a spot treatment to cover incidents of disease. On a well-managed farm, disease will be spotted early with specialist teams identifying and spot treating. This avoids harvesters accidently spreading disease thorough contamination of Personal protective equipment (ppe) and transfer to other areas. This in turn will keep on site disease levels low and avoid the use of large volumes of salt. This spot treatment is of a benefit and avoids whole crop treatment of a fungicide.

Insecticidal use

Crop and/or situation (a)	Member State or Country	Example product name as available on the market	FGI (b)	Pests or group of pests controlled (c)	Formulation		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)	g a.i./hl min max (g/hl)	Water l/ha min max	g a.i./ha min max (g/ha) (l)	g a.i./ha min max (g/ha) (l)		
Grapevine *Vitis vinifera*	France Not Relevant All MS	Not relevant	F	European grapevine moth: *Lobesia botrana*	SP Water soluble powder *	>970	Foliar application spraying	1st late April to May (BCH 55-57) 2nd July (BBCH 75-77) 3rd September (BBCH 83-91)	1 to 3	Depending on egg stage	600	200	1200	1200 to 3600	30	(n) (o)

* For uses where the column „Remarks. As above or other conditions to take into account

** Brackish water is the correct name of the final product

(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, between the plant – type of equipment used must be indicated
(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
(n): Careful application should be controlled in terms of spray and target should be only the foliage. Low volumes are recommended in order to avoid spill. It is recommended not to spray every year, only in emergency cases.
(o): Maximum total rate of salt should not overcome 6 kg / ha per year