

FINAL REGISTRATION REPORT

Part B

Section 0

Product Background, Regulatory Context and
GAP information

Product code: SHA 2600 E

Product name(s): PENSHUI

Chemical active substances:

Pendimethalin, 455 g/L

Central Zone

Zonal Rapporteur Member State: Poland

CORE ASSESSMENT

Applicant: Sharda Cropchem España S.L.

Submission date: June 2020

MS Finalisation date: December 2021; April 2022

Version history

When	What
12.2021	RMS finalised dRR assessment
04.2022	zRMS corrected dRR accordingly to received comments from Applicant and cMS.

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0 Product background, regulatory context and GAP information

0.1 Introduction

0.1.1 Reason for application

This application was submitted by SHARDA CROPCHAM ESPAÑA S.L. for approval of PENSUI, a capsule suspension formulation containing 455 g/L pendimethalin, for use as herbicide in several crops.

This application follows the data requirements for the active substance laid down in Regulation (EC) No. 283/2013 and the data requirements for the plant protection product laid down in Regulation (EC) No. 284/2013.

0.1.2 Details of zRMS(s) and concerned MS

Table 0.1-1: Overview of zRMS and cMS

	zRMS, product name and authorization no. (if relevant) *	(if relevant) Concerned MS, MS' product name and authorization number (if applicable) *
Northern zone	-	-
Central zone	Poland PENSUI	Germany Hungary Romania PENSUI
Southern zone	Malta PENSUI	Greece Spain PENSUI

* all MS' product name and authorization numbers are provided in Table 0.1-4 below.

0.1.3 Regulatory history of the active(s)

0.1.3.1 Pendimethalin

Table 0.1-2: Summary of regulatory history of CAS No: CAS-No 40487-42-1

Status	
Approved in EU	Y
Original Inclusion Directive or Commission Implementing Regulation	Original inclusion: Commission Directive 2003/31/EC Renewal: Commission Implementing Regulation (EU) No 2017/1114

Status	
RMS	RMS: SE, Co-RMS: NL The original RMS was Spain. By Reg. (EU) No 2019/724 SE is nominated as RMS and NL as Co-RMS Former RMS was NL
Date of Approval (or most recent renewal) of Active Substance (date of Regulation to be applied)	01/09/2017
Date of first Commission (re-registration) deadline (Step 1) or date of deadline for renewal of authorization (renewal)	01/12/2017
Date of final Commission (re-registration) deadline (Step 2)	01/12/2018
Current expiration of approval	31/08/2024
Low risk substance or Candidate for Substitution?	CfS

Issues that need to be considered as part of the EU renewing the approval are listed below.

In this overall assessment Member States must pay particular attention to:

- the specification of the technical material as commercially manufactured, which must be confirmed and supported by appropriate analytical data. The test material used in the toxicity dossiers shall be compared and verified against the specification of the technical material,
- the protection of operators
- the protection of birds, mammals and aquatic organisms.

Conditions of use shall include risk mitigation measures, where appropriate.

The SANCO report (7477/VI/98-final – 13/01/2003) and renewal report (SANTE/11656/2016 rev 2 – 18.05.2017) for pendimethalin are considered to provide the relevant information on the evaluation or a reference to where such information can be found. An EFSA Scientific Report is available for the renewal of the approval (EFSA Journal 2016;14(3):4420).

Table 0.1-3: Information on minimum purity of pendimethalin

EU agreed minimum purity from Inclusion Directive or Implementing regulation	(if different) Minimum purity of active substance used in the product / information on available equivalency report *, **
min. 900 g/kg	min. 980 g/kg Sharda source (assessment by UK) Equivalence report available: Y RMS: UK

* Since EU approval new studies on the active substance have been performed (e.g. new manufacturing site, new specification) and as a result the purity of the active substance has changed (see Part C).

**, If the specification of the active substance is different to that used as reference specification for EU approval then please refer to the equivalency document from the RMS.

The following table provides the endpoints used in the evaluation in the case that they deviate from EU endpoints.

Endpoint	Pendimethalin	
	EU agreed endpoint	Endpoint used*
Endpoint	EU agreed endpoint from EFSA Journal 2016;14(3):4420 <u>Representative formulation (BAS 455 48 H, CS formulation, 455 g/L):</u> Concentrate: 2% Spray dilution (4.55 g/L): 24% Spray dilution (1.14 g/L): 27% Based on <i>in vitro human skin</i> <u>Representative formulation (AG-P4-400-SC, 400 g/L)</u> Concentrate: 0.4% Spray dilution (20 g/L): 7% Spray dilution (4 g/L): 33% (pro-rata) Based on <i>in vitro human skin</i>	Concentrate: 25% Field dilution: 70%

* Since EU approval new studies on the active substance have been performed (e.g. new manufacturing site, new specification, confirmatory data)

0.1.4 Regulatory history of the product

Not relevant as the product has not yet been authorised.

0.2 zRMS conclusion

Uses to be considered safe on the basis of EU methodology:

Efficacy section: 1-4 and 5 (in line to Article 33) and uses: 6-13, 16-24 and 26-31 in line to Article 51 Mammalian toxicology section: Residues section: 1 – 5 6, 7 – 14 15, 17 – 20, 23, 27, Environmental fate and behavior section: 1-31 Ecotoxicology section 1 (for lower rate), 3,4, 7-18,21-26, 28-30
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Uses to be considered non-safe on the basis of EU methodology:

Efficacy section: 5, 14, 15, 25 Mammalian toxicology section: Residues section: 15 16, 21, 22, 28 – 31 Environmental fate and behavior section: none Ecotoxicology section: 1 (higher rate), 2, 4, 5, 6,1 9, 20, 27
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Uses for which safety has been established only following additional risk mitigation at a national (non-core) level or for which the evaluation is to be confirmed by relevant CMS:

Residues section: **6-none**

Ecotoxicology Section:

The risk for aquatic organism, birds and mammals should be considered at MSs level.

The following text is to be shortened or to be amended as necessary.

Residues section:

All accepted uses/ GAPs are covered by established MRLs

Conclusions:

Section Phys-chem:

Lack of results of ambient temperature shelf life (the study is on-going). Based on the results of accelerated storage test (14 days at 54°C) the 1 year registration of the product may be granted. Final 2-year registration will be possible after providing the results of ambient temperature shelf life.

Analytical methods:

No data gaps.

Efficacy section:

Detailed assessment is presented in B3. cMS should decide if uses 1-4 can be acceptable on the basis on submitted documentation (Article 33) and if uses: 6-13, 16-24 and 26-31 as minor crops can be accepted on the basis on the Article 51. Use ~~on apple~~ and pear should be excluded due to lack of selectivity trials and uses on potato and winter oilseed rape due to lack of efficacy and selectivity trials (at least 6 eff. and 4 sel. trials are required). **Use on apple can be consider by cMS as acceptable on the basis on new selectivity trials (N-E-4 trials and S-E-2 trials).**

Mammalian toxicology:

Classification of Penschui is following: ~~Skin Sens.1/H317~~ Repr.2/H361d

According to the EFSA calculator, it can be concluded that the risk for operator is acceptable with the use of gloves during mixing/loading and application.

For an application on cereals and winter oilseed rape is concluded that there is no unacceptable risk anticipated for the worker wearing adequate work clothing and with personal protective equipment for maintenance when re-entering treated crops with PENSUI.

For an application on low crops (bulb vegetables) it is no unacceptable risk anticipated for the worker wearing adequate work clothing and with personal protective equipment (gloves) for maintenance activities when for re-entering cotton treated with PENSUI

According to the EFSA calculator, when **a 2-3 m** buffer zone is employed and drift reduction technology is incorporated, the risk for residents can be considered as acceptable.

Residues section:

Data gaps:

Residue trials for uses **No 6, 15** – 16, 21, 22, 28 - 31.

Only post-harvest use is acceptable for stone fruits (use No 6).

Strawberry, Raspberry and Currants: uses only at BBCH: 00 and application rate: max. 1.365 is accepted

Fate section:

No risk for groundwater contamination with pendimethalin and its metabolites are expected when the product is applied according to proposed use in GAP.

Ecotoxicology section:

Birds and Mammals risk assessment:

The risk assessment shows that there is no acute risk for birds after exposure to Pendimethalin 45.5% CS. Most of the crops failed at Tier I for long-term exposure. The refinement of the chronic endpoint showed an acceptable long-term risk for birds except for cereals, maize, pulses and leafy vegetables. Further refinement of foliar DT₅₀ showed an acceptable long-term risk for birds.

No unacceptable risk is expected from exposure to via drinking water and via secondary poisoning from fish-eating birds. The risk of secondary poisoning to earthworm eating birds was found acceptable after refinement.

The risk assessment shows that there is no acute risk for mammals after exposure to Pendimethalin 45.5% CS. The refinement of parameters (e.g. foliar DT₅₀, PT, PD weight of evidence approach) showed still unacceptable long-term risk for mammals for rabbit for cereals (post emergence), ~~for brown hare in maize (post emergence)~~ and for vole in orchards, bush and cane fruits and vineyards.

For wood mouse the TER_{LT} values were slight below 5 (4.57) indicating needs for further refinement.

In zRMS's opinion taking into account that the default values of PT and DT₅₀ = 10 days were used and considering that trigger value is only slight below trigger of 5 the risk can be considered as an acceptable. It should be noted that DT₅₀ for pendimethalin seems to be less than 10 days for winter cereals/weeds.

However, there are not sufficiently data to provided quantitative risk assessment and WoE approach may be used at MSs level, if relevant.

No unacceptable risk is expected from exposure to via drinking water and via secondary poisoning from fish-eating mammals. The risk of secondary poisoning to earthworm eating mammals was found acceptable after refinement.

Aquatic risk assessment:

Based on lowest value of RAC of 0.23 µg a.s./L for aquatic organism agreed at EU level an acceptable risk for aquatic organisms the mitigation measures to aquatic organism should be considered and confirmed at MSs level.

The risk for **other non- target organism** is considered as acceptable.

Appendix 1 ALL intended uses

GAP rev. 0, date: 2019-June-5th

PPP (product name/code): Pendimethalin 45.5% CS
Active substance 1: pendimethalin
Active substance 2:
Safener: -
Synergist: -
Applicant: SHARDA Cropchem España
Zone(s): Central
Verified by MS: yes/no

Formulation type: CS (capsule suspension)
Conc. of as 1: 455 g/L
Conc. of as 2:
Conc. of safener: -
Conc. of synergist: -
Professional use: ☒
Non professional use: ☐

Field of use: Herbicide

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Use- No. ^(e)	Member state(s)	Crop and/ or situation (crop destination / purpose of crop)	F, Fn, Fpn G, Gn, Gpn or I	Pests or Group of pests controlled (additionally: developmen- tal stages of the pest or pest group)	Application				Application rate			PHI (days)	Remarks: e.g. g safener/synergist per ha ^(f)
					Method / Kind	Timing / Growth stage of crop & season	Max. number a) per use b) per crop/ season	Min. interval between applications (days)	kg or L product / ha a) max. rate per appl. b) max. total rate per crop/season	g or kg as/ha a) max. rate per appl. b) max. total rate per crop/season	Water L/ha min / max		

Zonal uses (field or outdoor uses, certain types of protected crops)												
1	CEU	Winter cereals (wheat, barley, rye, oats, triticale)	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTTMS) and annual dicotyledonous weeds (TTTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400	The risk for aquatic risk assessment for dose 1.59 kg a.s./ha is not acceptable for some scenarios. The risk need further refinement for mammals for 1.59 kg a.s./ha.
2	CEU	Winter cereals (wheat, barley, rye, oats, triticale)	F	Broadleaved and grass weeds	Spray	Post emergence BBCH 10-13	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400	Ecotox Section: The risk need further refinement for mammals for 1.59 kg a.s./ha. The for aquatic organism for dose 1.59 kg a.s./ha is not acceptable for some scenarios.
3	CEU	Maize	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTTMS) and annual dicotyledonous weeds (TTTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400 600	Efficacy section: water volume should be 200-400 L/ha Ecotox Section: The risk needs further refinement for mammals for 1.59 kg a.s./ha
4	CEU	Maize	F	Broadleaved and grass weeds	Spray	Post emergence BBCH 10-13	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-600	Ecotox Section: The risk needs further refinement for mammals for 1.59 kg a.s./ha
5	CEU	Pome fruits (apple, pear)	F	Broadleaved and grass weeds	Spray	Pre-emergence BBCH 00-09 applications between rows	a) 1 b) 1	NA	a) 3.5 b) 2.5	a) 1.59 b) 1.59	200-600	After harvest and before emergence next season Efficacy: this use can be considered as acceptable by cMS. Water volume should be 200-400 L/ha. Pest: annual monocotyle-donous weeds (TTTMS) and annual dicotyle-donous weeds (TTTDS) due to lack of selectivity trials this use should be excluded Ecotox Section: The risk needs further refinement for mammals.
6	CEU	Stone fruits (peach,	F	Broadleaved and grass	Spray	Pre-emergence BBCH	a) 1	NA	a) 3.5	a) 1.59	200-	B7: After harvest and before

		apricot, plum, nectarine, cherry)		weeds		00-09 applications between rows After harvest	b) 1		b) 3.5	b) 1.59	600		emergence next season Accepted Ecotox Section: The risk needs further re- finement for mammals Efficacy: can be accepted only according to Article 51 in PL
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7	CEU	Sunflower	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.6 b) 2.6	a) 1.183 b) 1.183	200-400		Efficacy: can be accepted only in line to Article 51. The risk for aquatic organism is not acceptable for some scenarios.
8	CEU	Soybean	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.6 b) 2.6	a) 1.183 b) 1.183	200-400		Efficacy: can be accepted only in line to Article 51.
9	CEU	Bulb vegetables (onion, garlic, shallot, spring onion)	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400		Efficacy: can be accepted only in line to Article 51. Ecotox Section: The risk for aquatic organism is not acceptable for some scenarios.
10	CEU	Bulb vegetables (onion, garlic, shallot, spring onion)	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Post emergence BBCH 10-13	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400		Efficacy: can be accepted only in line to Article 51. Ecotox Section: The risk for aquatic organism is not acceptable. for some scenarios.
11	CEU	Bean, pea, broad bean, field bean	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400		Efficacy: can be accepted only in line to Article 51. Ecotox Section: The risk for aquatic organism is not acceptable.
12	CEU	Carrot, parsley	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400		Efficacy: can be accepted only in line to Article 51. Ecotox Section: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
13	CEU	Lupine	F	Broadleaved and grass weeds annual monocotyledonous	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.6 b) 2.6	a) 1.183 b) 1.183	200-400		Efficacy: can be accepted only in line to Article 51.

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14	CEU	Winter oilseed rape	F	Broadleaved and grass weeds	Spray	Pre-emergence BBCH 00-09	a) 1 b) 1	NA	a) 1.0 b) 1.0	a) 0.455 b) 0.455	200-400		Efficacy; due to lack of efficacy and selectivity trials this use should be excluded
15	CEU	Winter oilseed rape	F	Broadleaved and grass weeds	Spray	Post emergence BBCH 10-16	a) 1 b) 1	NA	a) 2.0 b) 2.0	a) 0.91 b) 0.91	200-400		Not accepted (see B7) B7: accepted Efficacy; due to lack of efficacy and selectivity trials this use should be excluded
16	CEU	Asparagus	F	Broadleaved and grass weeds	Spray	Pre-emergence BBCH 00-09	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Not accepted (see B7) Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
17	CEU	Brassica vegetables (broccoli, Brussels sprouts, cabbage, cauliflower)	F	Broadleaved and grass weeds Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre transplanting	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Efficacy: can be accepted only in line to Article 51. Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
18	CEU	Strawberry	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09 applications between rows	a) 1 b) 1	NA	a) 3.5 3.0 b) 3.5 3.0	a) 1.137-1.59 1.365 b) 1.137-1.59 1.365	200-400		B7: Only at BBCH: 00 Application rate: max. 1.365
19	CEU	Raspberry	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09 applications between rows	a) 1 b) 1	NA	a) 3.0 b) 3.0	a) 1.365 b) 1.365	200-400		B7: Only BBCH: 00 Section Ecotoxicology The risk needs further refinement for mammals.
20	CEU	Currants	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09 applications between rows	a) 1 b) 1	NA	a) 3.5 3.0 b) 3.5 3.0	a) 1.59 1.365 b) 1.59 1.356	200-400		B7: Only BBCH: 00 Application rate: max. 1.365 Section Ecotoxicology The risk needs further refinement for mammals
21	CEU	Leek	F	Broadleaved and grass weeds	Spray	Pre-emergence BBCH 00-09	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Not accepted (see B7) Section Ecotoxicology:

													The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
22	CEU	Leek	F	Broadleaved and grass weeds	Spray	Post emergence BBCH 10-13	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Not accepted (see B7) Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
23	CEU	Parsnip	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre emergence BBCH 00-09	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Efficacy: can be accepted only in line to Article 51. Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
24	CEU	Lettuce, endive	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre transplanting	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Efficacy: can be accepted only in line to Article 51. Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
25	CEU	Potato	F	Broadleaved and grass weeds	Spray	Pre-emergence BBCH 00-09	a) 1 b) 1	NA	a) 2.5-3.5 b) 2.5-3.5	a) 1.137-1.59 b) 1.137-1.59	200-400		Efficacy: due to lack of efficacy and selectivity trials this use should be excluded Section Ecotoxicology: The risk for aquatic organism is not acceptable for dose 1.59 kg a.s./ha for some scenarios
26	CEU	Grapevine	F	Broadleaved and grass weeds annual monocotyledonous weeds (TTMS) and annual dicotyledonous weeds (TTDS)	Spray	Pre-emergence BBCH 00-09 applications between rows	a) 1 b) 1	NA	a) 3.5 b) 3.5	a) 1.59 b) 1.59	200-400		Efficacy: can be accepted only in line to Article 51. Section Ecotoxicology: The risk needs further refinement for mammals.
27	CEU	Ornamentals	F	Broadleaved and grass weeds	Spray	Pre emergence BBCH	a) 1	NA	a) 3.5	a) 1.59	200-		Efficacy: can be accepted

[illegible]

Remarks table heading:	(a)	e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)	(d)	Select relevant
	(b)	Catalogue of pesticide formulation types and international coding system CropLife International Technical Monograph n°2, 6th Edition Revised May 2008	(e)	Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1
	(c)	g/kg or g/l	(f)	No authorization possible for uses where the line is highlighted in grey, Use should be crossed out when the notifier no longer supports this use.
Remarks columns:	1	Numeration necessary to allow references	7	Growth stage at first and 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
	2	Use official codes/nomenclatures of EU Member States	8	The maximum number of application possible under practical conditions of use must be provided.
	3	For crops, the EU and Codex classifications (both) should be used; when relevant, the use situation should be described (e.g. fumigation of a structure)	9	Minimum interval (in days) between applications of the same product
	4	F: professional field use, Fn: non-professional field use, Fpn: professional and non-professional field use, G: professional greenhouse use, Gn: non-professional greenhouse use, Gpn: professional and non-professional greenhouse use, I: indoor application	10	For specific uses other specifications might be possible, e.g.: g/m ³ in case of fumigation of empty rooms. See also EPPO-Guideline PP 1/239 Dose expression for plant protection products.
	5	Scientific names and EPPO-Codes of target pests/diseases/ weeds or, when relevant, the common names of the pest groups (e.g. biting and sucking insects, soil born insects, foliar fungi, weeds) and the developmental stages of the pests and pest groups at the moment of application must be named.	11	The dimension (g, kg) must be clearly specified. (Maximum) dose of a.s. per treatment (usually g, kg or L product / ha).
	6	Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench	12	If water volume range depends on application equipments (e.g. ULVA or LVA) it should be mentioned under “application: method/kind”.
		Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated.	13	PHI - minimum pre-harvest interval
			14	Remarks may include: Extent of use/economic importance/restrictions

The risk for birds, mammals and aquatic organism should be considered at MSs level.