Document title

Annex to the comments of Propamocarb Regulatory Task Force on the CLH report for propamocarb

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M-855328-01-3

Propamocarb Regulatory Task Force

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This document provides additional comments to the comments on the CLH report for propamocarb (M-855327-01-1), submitted by the RMS Portugal, to ECHA which is open for public consultation during 25-03-2024 to 24-05-2024.

No.	Reference	Applicants' comment
(1)	11.1 Rapid degradability of organic substances Table 70, page 95	Reference is given to [redacted] (1999) Report nº 247207 M-310925-01-1 KCA 7.2.2.1/01. However, the results reported here are related to [redacted] (2008) Document No. M-299907-02-1, KCA 7.2.2.1/03. Please replace the results by those presented in KCA 7.2.2.1/01.
(2)	11.1 Rapid degradability of organic substances Table 70, page 95	There seems to be a typo at the end of the reference: 'da RAR' should probably read 'dRAR'.
(3)	11.1 Rapid degradability of organic substances Table 70, page 96	Method: Information on the applied method/guidelines is included twice. Please delete the first (incomplete) entry 'Manometric Respirometry Test' in its essential parts being identical with conditions of OECD 301 F.'
(4)	11.1 Rapid degradability of organic substances Table 70, page 96	The table containing corrected degradation data is incomplete, data from sampling days 24-28 are missing. Please add missing data to the table.
(5)	11.1 Rapid degradability of organic substances Table 70, page 98	There is a typo in the results for reference [redacted] (M-240450-01-1): '50□C' should read '50°C'.

No.	Reference	Applicants' comment
(6)	11.1 Rapid degradability of organic substances Table 70, pages 98-99	There is a typo in the results for several references: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(7)	11.1 Rapid degradability of organic substances Table 70, page 99	In the results presented for [redacted] (M-141261-01-1), an introductory explanation of the names of all four locations, application and sampling pattern would be helpful for clarification and better understanding of the subsequent results (please see the study by Cole below where this information is included). Further, the sentence 'following the application and was observed a DT50 value of ~ 378 days for Manitoba' should probably read 'following the application and a DT50 value of ~ 378 days for Manitoba was observed'
(8)	11.1 Rapid degradability of organic substances Table 70, page 102	There is a typo in the sections on soil accumulation studies and monitoring: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(9)	11.1 Rapid degradability of organic substances Table 70, page 103	The study by [redacted] (1995) M-157923-01-1 is a water/sediment study and not related to aerobic mineralisation in surface water (new data requirement) as given in the header above this section (page 102). A separate header for water/sediment studies should be included for clarification.
(10)	11.1 Rapid degradability of organic substances Table 70, page 103	There are several typos in the results for [redacted] (1995) M-157923-01-1: - Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly. Further, please correct the following sentences: - '~~PHC~~ The degradation in natural water and associated sediment was, principally~~mainly~~, through the action…'

No.	Reference	Applicants' comment
		- 'However, by~~By~~ the end of the study, ~~non extractable residues~~NER represented less than 10 % of AR.' - 'No accumulation of intermediate degradation products ~~wereas~~ **was** observed.' - 'The sediment DT50 values of ~~PHC propamocarb hydrochloride~~ **PCH** were higher than …' - 'The total system (water/sediment) DT50 **(DT_{90})** values were 21 (69) days and 16 (53) days …'. - 'The DT50 values of ~~propamocarb hydrochloridePHC~~ **PCH** for the water phase …' - In the reference, the year should be placed after the authors' names.
(11)	11.1 Rapid degradability of organic substances Table 70, page 104	Results presented for de[redacted] (M-310804-01-1): The guidelines followed are already stated under methods. Please delete them from the results section.
(12)	11.1 Rapid degradability of organic substances Table 70, page 104	There are several typos in the results for reference de[redacted] (M-310804-01-1): - Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly. Further, please correct the following sentences: - '…incubated under aerobic conditions at 20° C in the dark…' - '~~Propamocarb hydrochloride PHC~~ **PCH** degraded readily in the two water/sediment systems~~.~~ at 20°C.' - 'Overall recoveries of radioactive material was good for both test systems, as ~~propamocarb hydrochloridePHC~~ **PCH** was mineralised principally to CO2 and NER~~nonextractable residues~~.' - '… the concentration of these components was in all cases < 4 % AR. ~~of the applied radioactivity~~.' - '…and 1-~~p~~methyltetrahydro-1,3-diazin-2-one.'

No.	Reference	Applicants' comment
		- 'The DT50 values of ~~propamocarb hydrochloridePHC~~ **PCH** in the OVP and SW water/sediment systems…'
(13)	11.1 Rapid degradability of organic substances Table 70, page 104	[redacted] (1998) M-167940-02-1: Information on the study method and kinetic evaluation given under remarks should be transferred to methods.
(14)	11.1 Rapid degradability of organic substances Table 70, page 105	There is a typo in the sentence 'NER represented 20.1 %AR after 110 **days and** 2.25%AR by the end of the study.'
(15)	11.1 Rapid degradability of organic substances Table 70, page 105	[redacted] et al. (2015a) M-541774-01-1: Information on the kinetic evaluation given under remarks should be transferred to methods or included in the results part.
(16)	11.1 Rapid degradability of organic substances Table 70, page 105	[redacted] et al. (2015a) M-541774-01-1: The sentence 'Kinetic evaluation of degradation in total systems and in the water phase…' should read 'Kinetic evaluation of degradation in total systems and **dissipation from** ~~in~~ the water phase…'. Please adapt accordingly.
(17)	11.1 Rapid degradability of organic substances Table 70, page 106	Irradiated water/sediment studies: There are several typos: - Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly. - Further, please correct the following sentence: 'Consequently, the irradiated water/sediment study would not ~~providebetter~~ **provide better** understanding of the behaviour of propamocarb-**hydrochloride** and its residues…'.

No.	Reference	Applicants' comment
(18)	11.1 Rapid degradability of organic substances Table 70, page 107	[redacted] (2001) M-203298-01-1: There is a typo, please correct ~~clat loam~~ to **clay loam**.
(19)	11.1 Rapid degradability of organic substances Table 70, page 107	[redacted] (2001) M-203298-01-1: For better understanding of the presented results, please add 'The attempts to identify the metabolite **Unknown 1 (Unk 1)** failed…'.
(20)	11.1 Rapid degradability of organic substances Table 70, page 107	[redacted] (2001) M-203298-01-1: Information on the liquid chromatography and mass spectrometry techniques given under remarks should be transferred to methods or included in the results part.
(21)	11.1 Rapid degradability of organic substances Table 70, page 107	[redacted] (1979) M-157719-01-1: Please add the title of the report to the reference in line with other entries.
(22)	11.1 Rapid degradability of organic substances Table 70, page 107	There are several typos: - Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly. - '… was developed from ~~Gerrnan~~ **German** Standard Soil 2.2.' - '… found in the culture medium were detected in appreciable amounts (< 4 % **AR**).'
(23)	11.1 Rapid degradability of organic substances Table 70, page 108	[redacted] (1980) M-157721-01-1: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.

No.	Reference	Applicants' comment
(24)	11.1 Rapid degradability of organic substances Table 70, page 108	[redacted] (2015) M-529394-01-1: For clarification and better understanding of the results, please add 'The test substance [1-N-propyl-14C]-propamocarb-hydrochloride was incubated under aerobic conditions in the dark in soil Woolverstone at 20 °C and in soil Sarotti at 10°C, both at 45% of maximum moisture capacity (MWHC) for 90 days in maximum.' to the results section.
(25)	11.1 Rapid degradability of organic substances Table 70, page 108	[redacted] (2015) M-529394-01-1: Please correct the soil type for soil Sarotti, provided in the results once as loamy silt and once as loamy sand. The textural class for soil Sarotti is **silt loam**.
(26)	11.1 Rapid degradability of organic substances Table 70, page 109	[redacted] (2006) M-270482-01-1: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(27)	11.1 Rapid degradability of organic substances Table 70, page 110	[redacted] et al. (2015b) M-541770-01-1: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(28)	11.1 Rapid degradability of organic substances Table 70, page 110	[redacted] et al. (2015b) M-541770-01-1: It is not clear why the statement on the microbial biomass results of study KCA 7.1.2.1.1/15 are included in the results on kinetic re-evaluation. In the MCA, under this point it is only stated that information on the rate of degradation in aerobic soil was derived from this study. The detailed study summary is provided under KCA 7.1.1.1/11 where the microbial biomass data are already reported.
(29)	11.1 Rapid degradability of organic substances Table 70, page 110	[redacted]et al. (2015b) M-541770-01-1: For clarification, the following information should be added: 'For the active substance propamocarb-hydrochloride degradation data as referenced under KCA 7.1.2.1.1/01 to KCA 7.1.2.1.1/07 and KCA 7.1.2.1.1/15 were kinetically evaluated according to actual FOCUS Guidance to derive values for the half-life and the DT90 in aerobic soil from studies performed at 15 to 25°C for modelling and trigger endpoints.'

No.	Reference	Applicants' comment
		A comparable sentence is given on page 111, where further results of this reference are provided, but this sentence does not relate to the presented results and should be deleted there (please refer to **comment No. (31)**).
(30)	11.1 Rapid degradability of organic substances Table 70, page 110	[redacted] et al. (2015b) M-541770-01-1: The number of soils adequate for each trigger and modelling endpoint should be added as well as that degradation was found to be adequately described by SFO as kinetic model for all data sets to fit with experimental data.
(31)	11.1 Rapid degradability of organic substances Table 70, page 111	[redacted] et al. (2015b) M-541770-01-1: The sentence '~~Degradation data as referenced under KCA7.1.2.1.1/01 to KCA7.1.2.1.1/08 and KCA7.1.2.1.1/15 were kinetically evaluated according to actual FOCUS Guidance to derive values for the half-life and the DT90 in aerobic soil from studies performed at 15 to 25°C for modelling purposes.~~' does not refer to the presented results and should be replaced by 'For the active substance propamocarb-hydrochloride degradation data as referenced under KCA 7.1.2.1.1/07 and KCA 7.1.2.1.1/08 were kinetically re-evaluated according to FOCUS Guidance to derive values for the half-life and the DT90 in aerobic soil for trigger endpoints.' (please refer to **comment No. (29)**). This sentence is also provided in the table box on page 111 above.
(32)	11.1 Rapid degradability of organic substances Table 70, page 111	[redacted] et al. (2015b) M-541770-01-1: Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(33)	11.1 Rapid degradability of organic substances Table 70, page 111	[redacted] et al. (2015b) M-541770-01-1: Please add that SFO kinetics was determined to be the best-fit for the two data sets.
(34)	11.1 Rapid degradability of organic substances Table 70, page 112	[redacted] (2015b) M-530457-01-1: For consistency and clarification the table with the results of the kinetic evaluation should be added, in line with the study above ([redacted] (2015a)).

No.	Reference	Applicants' comment
(35)	11.1 Rapid degradability of organic substances Table 70, page 112	[redacted] et al. (2015a) M-541770-01-1: For clarification please add the following information: 'For metabolite N-desmethyl-propamocarb degradation data were kinetically evaluated according to FOCUS Guidance coming from one soil in a study performed with 14C-labeled active substance (KCA 7.1.2.1.2 /01). The data were evaluated to derive trigger and modelling endpoints for use as input parameters for environmental risk assessments.'
(36)	11.1 Rapid degradability of organic substances Table 70, page 112	[redacted] et al. (2015a) M-541770-01-1: There is a typo in the text below the table for the modelling endpoints: 'The evaluation resulted in a normalized half-life of ~~11.1~~ **11.2** days for use as modelling input parameter in environmental risk assessments.' Further, as only data from one soil is available, the term 'overall mean' should be deleted.
(37)	11.1 Rapid degradability of organic substances Table 70, page 113	[redacted] et al. (2015a) M-541770-01-1: No information on methods (reference to guidance) provided in the left column.
(38)	11.1 Rapid degradability of organic substances Table 70, page 113	[redacted] et al. (2015a) M-541770-01-1: For clarification please add the following information: 'For metabolite N-desmethyl-propamocarb degradation data the kinetic evaluation was performed according to FOCUS Guidance coming from four soils in a study performed with separately dosed 14C-labeled N-desmethyl propamocarb to soil (KCA 7.1.2.1.2/02). The data were evaluated to derive trigger and modelling endpoints for use as input parameters for environmental risk assessments.'
(39)	11.1 Rapid degradability of organic substances Table 70, page 114	[redacted] (2015b) M-541685-01-1: For clarification please add the following information: 'For metabolite propamocarb-N-oxide degradation data the kinetic evaluation was performed according to FOCUS Guidance coming from four soils in a study performed with separately dosed 14C-labeled propamocarb-N-oxide to soil (KCA 7.1.2.1.2/03). The data were evaluated to derive trigger and modelling endpoints for use as input parameters for environmental risk assessments.'

No.	Reference	Applicants' comment
(40)	11.1 Rapid degradability of organic substances Table 70, pages 114/115	[redacted] (1979) M-157717-01-1: There is a typo in the substance name: propamocarb ~~hidrochloride~~ **hydrochloride**. Further, the abbreviation is **PCH** and not PHC. Please replace accordingly.
(41)	11.1 Rapid degradability of organic substances Table 70, page 114	[redacted] (1979) M-157717-01-1: Information in the first and second paragraph is provided again in the third paragraph. Please adapt the text and delete redundant information accordingly.
(42)	11.1 Rapid degradability of organic substances Table 70, page 115	[redacted] (2002) M-310969-01-1, KCA 7.1.1.2/02: Redundant information is provided on the derived DT_{50} (DT_{90}) for the incubation groups in the last paragraph. The repetitive sentence should be deleted.
(43)	11.1 Rapid degradability of organic substances Table 70, page 115	[redacted] (2002) M-310969-01-1, KCA 7.1.2.1.4/02: The information provided here as results is not specific for or explicitly related to the cited reference but provides a conclusive evaluation of the anaerobic degradation of metabolites. This might be included separately. Please include here relevant results for the cited reference in line with the study above.
(44)	11.1 Rapid degradability of organic substances Table 70, page 116	[redacted] (1994) M-157828-01-1 & M-157830-01-1: Redundant information is provided on the derived DT_{50} and DT_{90} values in the last paragraph. The repetitive sentence should be deleted. Further, the abbreviation is **PCH** and not PHC. Please replace accordingly.
(45)	11.1 Rapid degradability of organic substances Table 70, page 116	There is a typo in the substance name 'propamocarb hydrochloridePHC'. Further, the abbreviation is **PCH** and not PHC. Please correct to propamocarb hydrochloride or PCH accordingly.
(46)	11.1 Rapid degradability of organic substances	[redacted] (1995) M-310246-01-1: The sentence 'The maximum molecular extinction coefficient and λ max were determined for NaOH at 261.0 dm3 mol-1 cm-1 and 217 nm, respectively.' occurs twice.

No.	Reference	Applicants' comment
	Table 70, page 117	Redundant information should be deleted. Also information on unlikely phototransformation at wavelengths greater than 290 nm is redundant at the beginning and end of the paragraph and should be adapted. The abbreviation is **PCH** and not PHC. Please replace accordingly.
(47)	11.1 Rapid degradability of organic substances Table 70, page 117	[redacted](2004) KCA 7.2.1.3/01: Please adapt the sentence 'In dark controls, no significant degradation ~~(was negligible)~~ of the ^{14}C-propamocarb hydrochloride was observed…'.
(48)	11.1.1 Ready biodegradability, page 122	As no enumeration of tables is provided, '~~Table 11.1.1-04~~ shows the pH values…' should be replaced by a reference like 'the table below'.
(49)	11.1.1 Ready biodegradability, page 124	There is a typo. Please add 'maintained at 22 ± 1 **°C** during the test'.
(50)	11.1.2 BOD5/COD, pages 131-132	Reference is made to the study KCA 7.2.2.2/01; [redacted], J.; 1983; M-157700-01-1. No summary is provided. Further, this reference is included under **A) Aerobic mineralization in surface water** (page 180), where it is referred to 'the summary presented under 11.1.2'. No study summary can be found in the CLH report. Please add a study summary for the study M-157700-01-1 to the report.
(51)	11.1.2 BOD5/COD, page 134	As no enumeration of tables is provided, '~~Table 11.1.2-02 (low dose) and Table 11.1.2-03 (high dose)~~' should be replaced by a reference like 'the tables below'.
(52)	11.1.3 Hydrolysis, page 136	The text passage '~~Duplicate samples at each pH were analysed […] In conclusion, [^{14}C] propamocarb did not degrade at 50°C over the five day period in any of the buffer systems tested~~.' should be deleted, as it does not provide a summary over all studies listed above, but contains information from the methods and results of KCA 7.2.1.1/02 only.

No.	Reference	Applicants' comment
(53)	11.1.3 Hydrolysis, pages 138-139	As no enumeration of tables is provided, references to table numbers should be replaced by a reference like 'the tables below'.
(54)	11.1.4.1 Field investigation and monitoring data, pages 143-144	The information provided under **A.1) Soil dissipation studies** is incomplete, as it contains only information on the US field study. There is further information available for four additional field soil dissipation trials located in Canada. Please also refer to original dossier, CA 7.1.2.2.1 Soil dissipation studies. Please add the missing information respectively. Please also refer to **comment No. (56)**.
(55)	11.1.4.1 Field investigation and monitoring data, page 145	As no enumeration of tables is provided, reference to ~~Table 11.1.4.1-01~~ should be replaced by a reference like 'the table below'.
(56)	11.1.4.1 Field investigation and monitoring data, page 149	Please refer to **comment No. (54)**. The information indicated as missing there is provided on page 149. However, for clarification it would be preferred to have it all provided in the introductory summary at the beginning of this section.
(57)	11.1.4.1 Field investigation and monitoring data, page 157	As no enumeration of tables is provided, reference to ~~Table Table 11.1.4.1-13~~ should be replaced by a reference like 'the table below'.
(58)	11.1.4.1 Field investigation and monitoring data, pages 160-166	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(59)	11.1.4.1 Field investigation and	There is redundant information in the conclusions: The section 'Two further terrestrial field soil dissipation studies were performed in the USA and Canada to support the available data. […] At two

No.	Reference	Applicants' comment
	monitoring data, pages 165-166	US sites in North Carolina and Illinois, the dissipation of ~~PHC~~ **PCH** in soil was biphasic with a very rapid early decline phase.' is provided twice. Please delete one of them.
(60)	11.1.4.1 Field investigation and monitoring data, page 166	Abstract should read Executive summary.
(61)	11.1.4.1 Field investigation and monitoring data, pages 177-179	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(62)	11.1.4.3 Water, water sediment and soil degradation data, page 180	Please also refer to **comment No. (50)**. On page 180 it is stated that this study 'was already summarized in this Report; please, refer to the summary presented under 11.1.2'. However, a detailed study summary is not provided there, but only a statement on the evaluation as supplemental information. Please add an adequate study summary to the CLH report.
(63)	11.1.4.3 Water, water sediment and soil degradation data, page 187	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(64)	11.1.4.3 Water, water sediment and soil degradation data, page 192	As no enumeration of tables is provided, reference to ~~Table 11.1.4.3-06~~ should be replaced by a reference like 'the table above'.
(65)	11.1.4.3 Water, water sediment and soil	E. Transformation of test substance: There is a typo in the first sentence. 'provided in the table below' should read 'provided in the table above'.

No.	Reference	Applicants' comment
	degradation data, page 192	
(66)	11.1.4.3 Water, water sediment and soil degradation data, page 192	As no enumeration of tables is provided, reference to ~~Table CA 8.2.2.3 08~~ should be replaced by a reference like 'the table below'.
(67)	11.1.4.3 Water, water sediment and soil degradation data, page 193	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(68)	11.1.4.3 Water, water sediment and soil degradation data, page 197	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly. Further, typos in the equation shown as 'lnC □ kt □ lnC0' should be corrected. In addition, the equation for the DT50 is missing and should be added.
(69)	11.1.4.3 Water, water sediment and soil degradation data, page 199	As no enumeration of tables is provided, reference to ~~Table11.1.4.3 13~~ should be replaced by a reference like 'the table below'. Further, there is a typo. 'The humin fraction contained 2.3% of the AR'. Please adapt accordingly.
(70)	11.1.4.3 Water, water sediment and soil degradation data, page 203	As no enumeration of figures is provided, reference to ~~Figure11.1.4.3 01~~ should be replaced by a suitable reference.

No.	Reference	Applicants' comment
(71)	11.1.4.3 Water, water sediment and soil degradation data, pages 205-206	Visual fits and statistics for sediment modelling endpoints of the Iron Hatch Stream and OVP were additionally included. However, as the endpoints for the Iron Hatch Stream were not considered for geometric mean calculation, information for at least this system might not be necessary in the summary.
(72)	11.1.4.3 Water, water sediment and soil degradation data, page 209	C.1.1) Aerobic degradation in soil (laboratory studies): Please correct the following typos: 'One German soil (25°C, moisture at 75% MWHC) ~~following repeated application of~~ **after application** of 14C-labeled propamocarb-hydrochloride (KCA 7.1.1.1/04)'. In this study, only one application was conducted. 'One German soil (25°C, moisture at ~~40%~~ **75%** MWHC) following repeated application of 1-Npropyl-14C-labeled active substance (KCA 7.1.1.1/05)'. 'Four soils under standard conditions (20°C **or 10°C**, moisture at 45% MWHC) after application of 2-Npropyl-14C-labeled active substance (KCA 7.1.1.1/07).', as group E was incubated at 10°C.
(73)	11.1.4.3 Water, water sediment and soil degradation data, page 217	Please note that the abbreviation for propamocarb hydrochloride is **PCH** and not PHC. Please replace accordingly.
(74)	11.1.4.3 Water, water sediment and soil degradation data, page 249	As no enumeration of tables is provided, reference to ~~Table CA 8.1.2.1.1-01~~ should be replaced by a reference like 'the table below'.

No.	Reference	Applicants' comment
(75)	11.1.4.3 Water, water sediment and soil degradation data, pages 255-258	Visual assessment and the figures of the pathway fit derived from the study report were additionally included. Please add further details (dossier point, study number) for unambiguous assignment.
(76)	11.1.4.3 Water, water sediment and soil degradation data, page 259	Data on the rate of degradation at 10°C had been generated in studies KCA 7.1.2.1.1/07, KCA 7.1.2.1.1/08, and KCA 7.1.2.1.1/09. However, only study summaries for KCA 7.1.2.1.1/08 and KCA 7.1.2.1.1/09 are presented subsequently. Please add respective information on study KCA 7.1.2.1.1/07 (in the MCA dossier it is referred to the summary provided under CA 7.1.1.1).
(77)	11.1.4.3 Water, water sediment and soil degradation data, page 262	As no enumeration of tables is provided, reference to ~~Table 11.1.4.3-54~~ should be replaced by a reference like 'the table above'.
(78)	11.1.4.3 Water, water sediment and soil degradation data, page 265	Table on Distribution and radioactive material balance: It is not clear why data for Borstel 40 cm 0a are presented in bold. Please change format to normal font type.
(79)	11.1.4.3 Water, water sediment and soil degradation data, pages 270-272	Assessment of the potential pH dependency: data presented here were derived from the MCA dossier regarding the EFSA request 53 (Bayer) and 54 (Arysta). However, the conclusive sentence differs, as in the CLH report it is stated that '*There is no significant correlation between the pH value and the degradation rates. Therefore, it is concluded that the degradation of propamocarb-hydrochloride and its metabolites is not pH-dependent*'. In the dossier it was stated 'that the degradation of propamocarb-hydrochloride is pH-dependent and the degradation of the metabolites is not pH-dependent'. Please check and adapt accordingly.

No.	Reference	Applicants' comment
(80)	11.1.4.3 Water, water sediment and soil degradation data, page 273	[redacted] (2015a) M-530922-01-1: It is not clear why in the executive summary moisture levels for the soils were provided twice, first as % (g water/100 g soil) and later as adjusted soil moisture (g water/100 g soil). The information should be provided with the sentence 'The degradation rate of the N-desmethyl-propamocarb was investigated in four soils under aerobic conditions at 20°C and at 33% (soil LS2.2), 44% (soil Laacher Hof AXXa), 45% (soil Fraunhofer 06A) and 50% (soil Attenschwiller) moisture of the MWHC in the dark' as it was summarized in the MCA dossier. Detailed data are already provided in the soil characterization table.
(81)	11.1.4.3 Water, water sediment and soil degradation data, page 274	The footnote 6 cannot be assigned to the text. Please check and adapt/delete accordingly.
(82)	11.1.4.3 Water, water sediment and soil degradation data, page 280	[redacted] (2015b) M-530457-01-1: Information in the executive summary is not correct: 'The degradation rate of the metabolite propamocarb-N-oxide was investigated in four soils under aerobic conditions at 20°C at 16% (g water/100 g soil) (soil LS2.2), 21.0% (soil Laacher Hof AXXa), 26.0% (soil Fraunhofer 06A) and 24.5% (soil Attenschwiller) moisture ~~of MWHC~~ in the dark. These moisture levels correspond to pF 2.0–2.5'. The moisture levels are 33% (soil LS2.2), 44% (soil Laacher Hof AXXa), 45% (soil Fraunhofer 06A) and 50% (soil Attenschwiller) moisture of MWHC in the dark. Please also refer to **comment No. (80)**.
(83)	11.1.4.3 Water, water sediment and soil degradation data, page 285	The text passage 'The full and fast degradation of the photolysis metabolite […] (all < 5% of applied active substance).' was not provided in the MCA dossier and added to the results. Beside the last sentence on the formation of metabolites, information provided therein seems to be related to the evaluation of the reliability and can probably be deleted or shortened.
(84)	11.1.4.3 Water, water sediment and soil	[redacted] et al. (2015a) M-541770-01-1: In the table 'Degradation study performed with propamocarb-hydrochloride', values for test moisture are mixed up for the two soils. The test moisture for soil Aromas is 12.7%, the test moisture for soil Porterville is 9.8%. Please change accordingly.

No.	Reference	Applicants' comment
	degradation data, page 288	
(85)	11.1.4.3 Water, water sediment and soil degradation data, page 290	In the conclusions, please adapt the sentence 'The evaluation resulted in a normalized half-life of ~~11.1~~ **11.2** days for use as modelling input parameter in environmental risk assessments' (please refer also to **comment No. (36)**).
(86)	11.1.4.3 Water, water sediment and soil degradation data, page 291	Referring to the comment above, in the table of modelling endpoints the normalized DT_{50} range should read 0.67 – ~~11.1~~ **11.2**.
(87)	11.1.4.3 Water, water sediment and soil degradation data, page 293	The normalized DT_{50} for soil Porterville in the table should read 11.2 days. Please adapt accordingly.
(88)	11.1.4.3 Water, water sediment and soil degradation data, page 296	As no enumeration of tables is provided, reference to ~~Table 11.1.4.3-97~~ should be replaced by a reference like 'the table below.
(89)	11.1.4.3 Water, water sediment and soil degradation data, page 297	Assessment of the potential pH dependency: Please refer to **comment No. (79)**. Please check and adapt accordingly.
(90)	11.1.4.3 Water, water sediment and soil	As no enumeration of tables is provided, reference to ~~Table 11.1.4.4-04~~ should be replaced by a reference like 'the table below.

No.	Reference	Applicants' comment
	degradation data, page 297	
(91)	11.1.4.3 Water, water sediment and soil degradation data, page 309	As no enumeration of figures is provided, reference given in the footnote to ~~Figure 8.1.1.1-03~~ should be replaced by a suitable reference.
(92)	11.1.4.3 Water, water sediment and soil degradation data, page 318	It is not clear why the sentence 'Two older studies (M-157849-01-1 and M-157698-01-1) have been conducted to investigate direct phototransformation of propamocarb-HCl' was added, as the information was already provided in the points above and might be misleading. Sentence should be deleted.
(93)	11.1.4.3 Water, water sediment and soil degradation data, pages 324-235	The table on phototransformation seems to be mixed up due to page break(s). Please correct and adapt the formatting.