

FINAL REGISTRATION REPORT

Part B

Section 3

Efficacy Data and Information

Concise summary

Product code: -

Product name: Repentol 6 PA/ Repentol 6 PA Bis

Chemical active substance:

quartz sand, 300 g/kg

Central Zone

Zonal Rapporteur Member State: Poland

CORE ASSESSMENT

(authorization, renewal of authorisation)

Applicant: DCR ~~Sp. z o.o.~~ S.A.

Submission date: 27/11/2023, 17/07/2024

MS Finalisation date: 05/2025; 09/2025

Version history

When	What
27/11/2023	Update of dRR/RR including name of applicant, classification, extension of authorisation for non-professional uses, minor uses extension, dose reduction and label extension, change of packaging. Details in Part B0 point 0.1
27/11/2023	Update of dRR/RR for renewal of PPP authorisation acc. to Art. 43 Reg. 1107/2023.
17/07/2024	Update of renewal dRR/RR after applicant's name change.
05/2025	ZRMs assessed dRR for renewal of authorisation
09/2025	The final Registration Report

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3 Efficacy Data and Information (including Value Data) on the Plant Protection Product (KCP 6)

Transformation of the dRR (applicant version) into the RR (zRMS version)

The process chosen by the zRMS to transform the dRR into a RR should be explained. Options are to rewrite the document (with track change or not) or to use commenting boxes such as the following:

Comments of zRMS:	Comments of zRMS are presented in commenting boxes at the end of each chapter. The text of dRR was generally not changed or rewritten (small changes in the document are marked by grey colour). ZRMs assessed dRR for renewal authorization (changes marked in turquoise).
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3.1 Summary and conclusions of zRMS on Section 3: Efficacy (KCP 6)

Abstract

Comments of zRMS: Overall summaries are not necessary here. It was provided at the end of each chapter of the dRR. ZRMs positively assessed the possibility of renewal authorization. Repentol 6 PA/ Repentol 6 PA Bis can still be on the Polish market.

Table 3.1-1: Acceptability of intended uses (and respective fall-back GAPs, if applicable)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Use- No. *	Member state(s)	Crop and/ or situation (crop destination / purpose of crop)	F, Fn, Fnp G, Gn, Gnp or I **	Pests or Group of pests controlled (additionally: developmental stages of the pest or pest group)	Application				Application rate			PHI (days)	Remarks: e.g. g safener/ synergist per ha, other dose rate expression, dose range (min-max)	zRMS Conclusion (efficacy)
					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														
1	PL	Deciduous and coniferous trees in forestry	F Fn	games and lagomorphs browsing damage	painting with rubber or gloves: terminal shoots of individual plants	autumn - winter (end of vegetation period and before start of browsing, 2-5 years old trees)	a) 1 b) 1	not relevant	a) 2.5-4.0 kg/1000 trees b) 2.5-4.0 kg/1000 trees	a) 0.75-1.2 kg/1000 trees b) 0.75-1.2 kg/1000 trees	not relevant	not relevant	-	Acceptable
2	PL	Deciduous and coniferous trees in forestry	F Fn	games bark stripping	painting with rubber or gloves: trees' bark	autumn - winter (end of vegetation period and before start of bark stripping, 2-5 years old trees)	a) 1 b) 1	not relevant	a) 8.0-10.0 kg/1000 trees b) 8.0-10.0 kg/1000 trees	a) 2.4-3.0 kg/1000 trees b) 2.4-3.0 kg/1000 trees	not relevant	not relevant	-	Acceptable
Minor uses according to Article 51														
3	PL	Forest nursery plants, renewals, afforestation and seed plantations of forest trees, ornamental shrubs and trees, Christmas trees grown on plantations	F Fn	games, lagomorphs, squirrel family beaver family browsing damage	painting with rubber or gloves: terminal shoots of individual plants	autumn - winter (end of vegetation period and before start of browsing, 2-5 years old trees)	a) 1 b) 1	not relevant	a) 2.0-4.0 kg/1000 trees b) 2.0-4.0 kg/1000 trees	a) 0.6-1.2 kg/1000 trees b) 0.6-1.2 kg/1000 trees	not relevant	not relevant	-	Acceptable

4	PL	Pear, plum, sweet cherry, sour cherry, peach, apricot, hazel, walnut, quince	F Fnn	games, lagomorphs, squirrel family beaver family browsing damage	painting with rubber or gloves: terminal shoots of individual plants	autumn - winter (end of vegetation period and before start of browsing, 2-5 years old trees)	a) 1 b) 1	not relevant	a) 2.0-4.0 kg/1000 trees b) 2.0-4.0 kg/1000 trees	a) 0.6-1.2 kg/1000 trees b) 0.6-1.2 kg/1000 trees	not relevant	not relevant	-	Acceptable
5	PL	Gooseberry, choke berry, highbush blueberry, vines	F Fn	games, lagomorphs, squirrel family beaver family browsing damage	painting with rubber or gloves: terminal shoots of individual plants	autumn - winter (end of vegetation period and before start of browsing, 2-5 years old trees)	a) 1 b) 1	not relevant	a) 2.0-4.0 kg/1000 trees b) 2.0-4.0 kg/1000 trees	a) 0.6-1.2 kg/1000 trees b) 0.6-1.2 kg/1000 trees	not relevant	not relevant	-	Acceptable
6	PL	Ornamental trees, Christmas trees grown on plantations	F Fn	games bark stripping	painting with rubber or gloves: trees' bark	autumn - winter (end of vegetation period and before start of bark stripping)	a) 1 b) 1	not relevant	a) 8.0-11.0 kg/1000 trees b) 8.0-11.0 kg/1000 trees	a) 2.4-3.3 kg/1000 trees b) 2.4-3.3 kg/1000 trees	not relevant	not relevant	-	Acceptable
7	PL	Pear, plum, sweet cherry, sour cherry, peach, apricot, hazel, walnut	F Fn	games bark stripping	painting with rubber or gloves: trees' bark	autumn - winter (end of vegetation period and before start of bark stripping)	a) 1 b) 1	not relevant	a) 8.0-11.0 kg/1000 trees b) 8.0-11.0 kg/1000 trees	a) 2.4-3.3 kg/1000 trees b) 2.4-3.3 kg/1000 trees	not relevant	not relevant	-	Acceptable

* Use number(s) in accordance with the list of all intended GAPs in Part B, Section 0 should be given in column 1.

** 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

Column 15: zRMS conclusion.

A	Acceptable
R	Acceptable with further restriction
C	To be confirmed by cMS
N	Not acceptable / evaluation not possible
n.r.	Not relevant for section 3

3.2 Efficacy data (KCP 6)

Introduction

Repentol 6 PA and Repentol 6 PA Bis are repellents already registered in Poland (authorisation number R-176/2017 on 01.09.2017 and R-18/2019 on 25.01.2019). Efficacy of Repentol 6 PA / Repentol 6 PA Bis was initially summarised and evaluated in the Core Assessment evaluated by zRMS Poland in December 2016 and re-evaluated in 2019 (Registration Report Core Assessment zRMS Poland November 2019). Since previously authorised rates were much higher and are no longer valid, this document included only currently authorised rates.

This document summarizes information concerning lower efficient application rates of Repentol 6 PA regarding browsing damages caused by wild game and efficacy of Repentol 6 PA in protection of deciduous and coniferous trees in forestry against barks stripping by wild game.

Description of active substances

Table 3.2-1: Details of the active substances

Active substance	Quartz sand
Concentration	300 g/kg
Chemical group	inorganic compound
Mode of action	mechanical
Biological action	repellent

Description of the plant protection product

Repentol 6 PA is a paste (PA) containing one active substance quartz sand.

Table 3.2-2: Simplified table of previous uses and requested uses for the product code.

Uses		Member State	Currently registered rate(s)	Requested rate(s)	Comments / Other relevant details on GAPs
Crop(s)	Target(s)				
deciduous and coniferous trees	games and lagomorphs browsing damage	PL	browsing damage: 2.5-4.0 kg/1000 trees	-	-
deciduous and coniferous trees	games bark stripping	PL	bark stripping: 8.0-10.0 kg/1000 trees	-	-
forest nursery plants, renewals, afforestation and seed plantations of forest trees, ornamental shrubs and	games, lagomorphs, squirrel family beaver family browsing damage	PL	browsing damage: 2.5-4.0 kg/1000 trees	-	Art. 51

Uses		Member State	Currently registered rate(s)	Requested rate(s)	Comments / Other relevant details on GAPs
Crop(s)	Target(s)				
trees, Christmas trees grown on plantations					
pear, plum, sweet cherry, sour cherry, peach, apricot, hazel, walnut, quince	games, lagomorphs, squirrel family beaver family browsing damage	PL	browsing damage: 2.5-4.0 kg/1000 trees	-	Art. 51
gooseberry, choke berry, highbush blueberry, vines	games, lagomorphs, squirrel family beaver family browsing damage	PL	browsing damage: 2.5-4.0 kg/1000 trees	-	Art. 51
ornamental trees, Christmas trees grown on plantations	games bark stripping	PL	bark stripping: 8.0-10.0 kg/1000 trees	-	Art. 51
pear, plum, sweet cherry, sour cherry, peach, apricot, hazel, walnut	games bark stripping	PL	bark stripping: 8.0-10.0 kg/1000 trees	-	Art. 51

Further details are in the table “All intended uses” in Part B - Section 0.

Description of the target pests

Table 3.2-3: Glossary of pests mentioned in the dossier.

EPPO code	Scientific name	Common name*
CERVEL	<i>Cervus elaphus</i>	red deer
CAPRCA	<i>Capreolus capreolus</i>	roe deer
DAMADA	<i>Cervus dama</i>	fallow deer
ALCSAL	<i>Alces alces</i>	moose
LEPUTI	<i>Lepus timidus</i>	hare

* optional

Table 3.2-4: Major / minor status of intended uses (for all cMS and zRMS).

Crop and/or situation	Crop status		Pests or group of pests controlled	Pest status	
	Major	minor		Major	minor
Trees in forestry	PL	-	red deer	PL	-

Crop and/or situation	Crop status		Pests or group of pests controlled	Pest status	
	Major	minor		Major	minor
			roe deer	PL	-
			fallow deer	PL	-
			moose	PL	-
			hare	PL	-

Compliance with the Uniform Principles

The overall assessment was performed according to the uniform principles. No deviations from EPPO guidelines have been identified. In order to confirm efficacy of Repentol 6 PA lower application rates, efficacy trials conducted in Poland were submitted. Additionally, in order to confirm efficacy of Repentol 6 PA in protection of deciduous and coniferous trees in forestry against barks stripping by wild game efficacy trials conducted in Poland were also submitted.

Information on trials submitted

Table 3.2-5: Summary of information concerning trials sites and application details

Type of trials: efficacy/phytotoxicity/other Identity of the product under test (commercial name(s), active substance(s), content, formulation type(s): Crop: Harmful organisms (common name, scientific name, Bayer Code) or intended use: Treatment:				efficacy/phytotoxicity Repentol 6 PA, quartz sand 300 g/kg deciduous and coniferous trees games winter 2018/2019			
Test Report; Year	Testing Unit	Trial location	Test method Plot size	Application details			Remarks
				Method	Equipment	Crop BBCH	
North-East Zone: Browsing damage							
(1) ZOPRS/15/2018 2018/2019 (KCP 6.2/01)	InHort Instytut Ogrodnictwa ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Zwierzyniec (Forest District) Province: łódzkie District: Skierniewice Community: Maków Poland	PP 1/152 PP 1/181 (2) Plot size: 50 trees	manually using glove and brush	not relevant	not relevant	<i>Fagus sylvatica</i> L. application date: 10.12.2018
(2) ZOPRS/15/2018 2018/2019 (KCP 6.2/02)	InHort Instytut Ogrodnictwa ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Zwierzyniec (Forest District) Province: łódzkie District: Skierniewice Community: Maków Poland	PP 1/152 PP 1/181 (2) Plot size: 50 trees	manually using glove and brush	not relevant	not relevant	<i>Pinus</i> L. application date: 10.12.2018
(3) ZOPRS/15/2018 2018/2019 (KCP 6.2/03)	InHort Instytut Ogrodnictwa ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Nieborów (Forest District) Province: łódzkie District: Łowicz Community: Nieborów Poland	PP 1/152 PP 1/181 (2) Plot size: 50 trees	manually using glove and brush	not relevant	not relevant	<i>Pinus</i> L. application date: 10.12.2018

S18-07559-01 2018/2019 (KCP 6.2/04)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Oborniki Province: wielkopolskie District: obornicki Community: Oborniki Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 100 m ² 10 000 plants/ha	manually using glove	not relevant	97	<i>Scots pine</i> application date: 23.11.2018
S18-07559-02 2018/2019 (KCP 6.2/05)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Kruszewo Province: wielkopolskie District: pilski Community: Ujście Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 100 m ² 10 000 plants/ha	manually using glove	not relevant	97	<i>Scots pine</i> application date: 27.11.2018
S18-07559-03 2018/2019 (KCP 6.2/06)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Zamość Province: wielkopolskie District: ostrowski Community: Sieroszowice Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 60 m ² 12 000 plants/ha	manually using glove	not relevant	97	<i>Scots pine</i> application date: 06.12.2018
North-East Zone: Bark stripping							
(4) ZOPRS/15/2018 2018/2019 (KCP 6.2/07)	InHort Instytut Ogrodnictwa ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Bolimów (Forest District) Province: łódzkie District: Skierniewice Community: Bolimów Poland	PP 1/152 PP 1/181 (2) Plot size: 50 trees	manually using glove and brush	not relevant	not relevant	<i>Fagus sylvatica</i> L. application date: 10.12.2018
(5) ZOPRS/15/2018 2018/2019 (KCP 6.2/08)	InHort Instytut Ogrodnictwa ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Nieborów (Forest District) Province: łódzki District: Łowicz Community: Nieborów Poland	PP 1/152 PP 1/181 (2) Plot size: 50 trees	manually using glove and brush	not relevant	not relevant	<i>Pinus</i> L. application date: 10.12.2018
(6) ZOPRS/15/2018	InHort Instytut Ogrodnictwa	Nieborów (Forest District)	PP 1/152 PP 1/181 (2)	manually using glove and brush	not relevant	not relevant	<i>Pinus</i> L. application date:

2018/2019 (KCP 6.2/09)	ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Province: łódzki District: Łowicz Community: Nieborów Poland	Plot size: 50 trees				10.12.2018
S18-07558-01 2018-2019 (KCP 6.2/10)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Oborniki Province: wielkopolskie District: obornicki Community: Oborniki Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 40 m ² 1000 plants/ha	manually using brush	not relevant	97	<i>Pine</i> application date: 23.11.2018
S18-07558-02 2018-2019 (KCP 6.2/11)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Kruszewo Province: wielkopolskie District: pilski Community: Ujście Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 60 m ² 1000 plants/ha	manually using brush	not relevant	97	<i>Pine</i> application date: 27.11.2018
S18-07558-03 2018-2019 (KCP 6.2/12)	Eurofins Agrosience Services Sp z o.o. ul. Parkowa 6 64-530 Kazimierz Poland	Pieruchy Province: wielkopolskie District: pleszewski Community: Czermin Poland	PP 1/152 (4) PP 1/181 (4) PP 1/135 (4) PP 1/200 (1) Plot size: 60 m ² 1000 plants/ha	manually using brush	not relevant	97	<i>Pine</i> application date: 06.12.2018

Table 3.2-6: Rates of application and timing of application

Trial code; Year	Testing Unit	Product	Application timing	Dose	
				g as/ha	Product kg/ha
Browsing damage					
(1) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	502	2
		Repentol 6 PA	10.12.2018	600	2
		Repentol 6 PA	10.12.2018	750	2.5
		Repentol 6 PA	10.12.2018	1200	4
(2) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	502	2
		Repentol 6 PA	10.12.2018	600	2
		Repentol 6 PA	10.12.2018	750	2.5
		Repentol 6 PA	10.12.2018	1200	4
(3) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	502	2
		Repentol 6 PA	10.12.2018	600	2
		Repentol 6 PA	10.12.2018	750	2.5
		Repentol 6 PA	10.12.2018	1200	4
S18-07559-01 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	23.11.2018	502	2
		Repentol 6 PA	23.11.2018	600	2
		Repentol 6 PA	23.11.2018	750	2.5
		Repentol 6 PA	23.11.2018	1200	4
S18-07559-02 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	27.11.2018	502	2
		Repentol 6 PA	27.11.2018	600	2
		Repentol 6 PA	27.11.2018	750	2.5
		Repentol 6 PA	27.11.2018	1200	4
S18-07559-03 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	06.12.2018	502	2
		Repentol 6 PA	06.12.2018	600	2
		Repentol 6 PA	06.12.2018	750	2.5
		Repentol 6 PA	06.12.2018	1200	4
Bark stripping					
(4) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	2510	10

		Repentol 6 PA	10.12.2018	1800	6
		Repentol 6 PA	10.12.2018	2400	8
		Repentol 6 PA	10.12.2018	3000	10
(5) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	2510	10
		Repentol 6 PA	10.12.2018	1800	6
		Repentol 6 PA	10.12.2018	2400	8
		Repentol 6 PA	10.12.2018	3000	10
(6) ZOPRS/15/2018 2018/2019	InHort	Control	-	-	-
		Cervacol Extra PA	10.12.2018	2510	10
		Repentol 6 PA	10.12.2018	1800	6
		Repentol 6 PA	10.12.2018	2400	8
		Repentol 6 PA	10.12.2018	3000	10
S18-07558-01 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	23.11.2018	2510	10
		Repentol 6 PA	23.11.2018	1800	6
		Repentol 6 PA	23.11.2018	2400	8
		Repentol 6 PA	23.11.2018	3000	10
S18-07558-02 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	27.11.2018	2510	10
		Repentol 6 PA	27.11.2018	1800	6
		Repentol 6 PA	27.11.2018	2400	8
		Repentol 6 PA	27.11.2018	3000	10
S18-07558-03 2018-2019	Eurofins	Control	-	-	-
		Cervacol Extra PA	06.12.2018	2510	10
		Repentol 6 PA	06.12.2018	1800	6
		Repentol 6 PA	06.12.2018	2400	8
		Repentol 6 PA	06.12.2018	3000	10

Table 3.2-7: Details of assessments carried out in efficacy tests

Trial code; Year; Testing Unit	Type of assessment			
	Efficacy		Phytotoxicity	
	Assessment date	Crop growth stage (BBCH)	Assessment date	Crop growth stage (BBCH)
Browsing damage				
(1) ZOPRS/15/2018 2018/2019 InHort	24.01.2019 07.03.2019 23.04.2019	not relevant	24.01.2019 07.03.2019 23.04.2019	not relevant
(2) ZOPRS/15/2018 2018/2019 InHort	24.01.2019 07.03.2019 23.04.2019	not relevant	24.01.2019 07.03.2019 23.04.2019	not relevant
(3) ZOPRS/15/2018 2018/2019 InHort	24.01.2019 07.03.2019 23.04.2019	not relevant	24.01.2019 07.03.2019 23.04.2019	not relevant
S18-07559-01 2018-2019 Eurofins	07.12.2018 02.01.2019 04.03.2019 08.04.2019 14.05.2019	99 99 01 11 16	07.12.2018 02.01.2019 04.03.2019 08.04.2019 14.05.2019	99 99 01 11 16
S18-07559-02 2018-2019 Eurofins	11.12.2018 02.01.2019 04.03.2019 10.04.20109 14.05.2019	99 99 01 11 16	11.12.2018 02.01.2019 04.03.2019 10.04.20109 14.05.2019	99 99 01 11 16
S18-07559-03 2018-2019 Eurofins	21.12.2018 08.01.2019 13.03.2019 16.04.2019 11.05.2019	99 99 01 11 16	21.12.2018 08.01.2019 13.03.2019 16.04.2019 11.05.2019	99 99 01 11 16
Bark stripping				
(4) ZOPRS/15/2018 2018/2019 InHort	25.01.2019 07.03.2019 23.04.2019	not relevant	25.01.2019 07.03.2019 23.04.2019	not relevant
(5) ZOPRS/15/2018 2018/2019 InHort	25.01.2019 07.03.2019 23.04.2019	not relevant	25.01.2019 07.03.2019 23.04.2019	not relevant
(6) ZOPRS/15/2018 2018/2019 InHort	25.01.2019 07.03.2019 23.04.2019	not relevant	25.01.2019 07.03.2019 23.04.2019	not relevant
S18-07558-01 2018-2019 Eurofins	02.01.2019 04.03.2019 08.04.2019 05.06.2019	99 01 11 32	02.01.2019 04.03.2019 08.04.2019 05.06.2019	99 01 11 32
S18-07558-02 2018-2019 Eurofins	04.01.2019 04.03.2019 10.04.2019 05.06.2019	99 01 11 32	04.01.2019 04.03.2019 10.04.2019 05.06.2019	99 01 11 32
S18-07558-03 2018-2019 Eurofins	08.01.2019 16.03.2019 16.04.2019 10.06.2019	99 01 11 33	08.01.2019 16.03.2019 16.04.2019 10.06.2019	99 01 11 33

Table 3.2-8: Presentation of trials (efficacy trials)

Crop(s) *	Target(s)*	Country	Years	Type of trial**	Number of trials (number of valid trials)	GEP, non-GEP, official***	Comments (any other relevant information)
					North-East Zone		
Browsing damage of deciduous and coniferous trees	games	PL	2018/2019	E	6	GEP	-
	TOTAL	PL	2018/2019	E	6	GEP	-
Bark stripping of deciduous and coniferous trees	games	PL	2018/2019	E	6	GEP	-
	TOTAL	PL	2018/2019	E	6	GEP	-

* According to the GAP table. Timing of the application(s) can be added if relevant (e.g. Pre-emergence vs post-emergence, spring vs autumn).

** P = preliminary trial, MED = minimum effective dose, E = efficacy trial.

*** GEP: Good Experimental Practices. Official: carried out by a national official organisation.



Trial locations for
browsing damage



Trial locations for
bark stripping

Table 3.2-9: Presentation of reference standards used in trials (efficacy trials)

Crop(s)	Referen ce standar d	Country(i es) where the product is registered (1)	Authorizati on number	Active substance(s)	Formulation		Registere d applicati on rate (3)	Applicati on rate in trials (per treatment)	Remark (4)
					Type (2)	Concentr ation of a.s.			
Browsing damage of deciduou s and coniferou s trees	Cervacol Extra PA	PL	R-85/2014	quartz sand	PA	251 g/kg	2-5 kg/1000 trees	2 kg/1000 trees	-
Bark stripping of deciduou s and coniferou s trees	Cervacol Extra PA	PL	R-85/2014	quartz sand	PA	251 g/kg	2-14 kg/1000 trees	10 kg/1000 trees	-

(1) only on use(s) applied for (with the test product).

(2) e.g. WP (wetable powder), EC (emulsifiable concentrate), etc.

(3) dose(s) / dose range authorized on that use in the country.

(4) Other relevant information (e.g. uses, number of applications, spray volume, method of application, etc.).

Comments of zRMS:	This document summarises the information related to the efficacy of the plant protection product – Repentol 6 PA, according to Article 33 of Regulation 1107/2009. Repentol 6 PA is a repellent already registered in Poland (authorisation number R-176/2017 on 01.09.2017). The formulation of this product is a paste (PA) and it containing active substances: quartz sand (300 g/kg). For now quartz sand is on the list of approved active substances (decisions accordingly the transitional regime stipulated in Article 80 of Regulation 1107/2009 concerning the placing of plant protection products on the market - blood meal, calcium carbide, calcium carbonate, limestone, pepper and quartz sand - 27 April 2012), Commission Implementing Regulation (EU) 2016/673 of 29 April 2016 amending Regulation (EC) No 889/2008 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control. Sand quartz is an inorganic compound with mechanical mode of action, having a property of repelling unwanted species in a given location. Their use is classified as biological (ecological) protection methods. In Poland 4 repellents (Repentol 6 PA; Repentol 6 PA Bis; WAM Extra PA; Cervacol Extra PA) with the same active compound – quartz sand at the same formulation (PA) are registered and commonly used for protection trees against browsing (gnawing). Repentol 6 PA is plant protection product that is on Polish market form few years and is known of its high quality and efficacy. Currently registered application rates are 10-15 kg/1000 trees against browsing damage. Assessment for renewal authorisation: Using products with sand quartz to combat browsing and stripping damage caused by lagomorphs and game animals has many advantages. Sand quartz can create rough surfaces that deter animals from gnawing or stripping bark, reducing damage. The texture and composition can act as a natural repellent, helping to keep animals away from protected areas. Sand quartz-infused products are more resistant to environmental wear, ensuring long-lasting protection against animal activity. Products with sand quartz are typically non-toxic, making them safer for the environment and other wildlife. Long-lasting durability can lead to cost savings as they reduce the need for replacement or additional treatments. Since previously authorised rates were much higher and are no longer valid, this document included only currently authorised rates. This document summarizes information concerning lower efficient application rates of Repentol 6 PA regarding browsing damages caused by wild game and efficacy of Repentol 6 PA in protection of deciduous and coniferous trees in forestry against barks stripping by wild game. Information's from previous assessments are still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to Article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.2.1 Preliminary tests (KCP 6.1)

No preliminary trials were performed and provided since Repentol 6 PA is not a new formulation. Repentol 6 PA used to be registered and applied in Poland few years ago.

Summary and conclusions on the preliminary trials

Not relevant.

Comments of zRMS:	No results of the preliminary range-finding tests were submitted by the Applicant. The active substances of Repentol 6 PA – quartz sand is registered and has been commonly used in forestry practice for many years. Also a large scale efficacy trials are available to evaluate the effectiveness of products containing quartz sand as active compound. Therefore, there was no need for preliminary range-finding tests in the opinion of Evaluator. This product have been registered in Poland few years ago. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.2.2 Minimum effective dose tests (KCP 6.2)

Forestry

No trials on minimum effective dose were provided since Repentol 6 PA is not a new formulation. Repentol 6 PA used to be registered and applied in Poland few years ago. Additionally, the efficacy depends on accuracy of tree coating not on application rate expressed in amount per hectare. Application rate per hectare depends on trees density and height but has no effect on efficacy.

Summary and conclusions on the minimum effective dose

Not relevant.

Comments of zRMS:	In order to provide information to establish the minimum effective dose, some of the trials conducted to demonstrate efficacy should include at least one lower dose(s) (for example 60–80% of the recommended dose) to that which would be recommended. It is utilized to achieve the desired effect. However, Repentol 6 PA was registered few years ago. Also, we should remember that its efficacy depends on accuracy of tree coating not on application rate expressed in amount per hectare. Application rate per hectare depends on trees density and height but has no effect on efficacy. Therefore, the data of minimum effective dose were not required. Also in the literature we can found information's about efficacy of the plant protection products containing quartz sand. Therefore the lack of minimum effective dose tests can be observed as acceptable in the opinion of Evaluator. Assessment for renewal authorisation: No additional data are required. Since previously authorised rates were much higher and are no longer valid, this document included only currently authorised rates. This document summarizes information concerning lower efficient application rates of Repentol 6 PA regarding browsing damages caused by wild game and efficacy of Repentol 6 PA in protection of deciduous and coniferous trees in forestry against barks stripping by wild game.
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3.2.3 Efficacy tests (KCP 6.2)

Table 3.2-5: Details on trial methodology

Browsing damage		
Guidelines	General guidelines	EPPO PP 1/152, EPPO PP 1/181 (2)
	Specific guidelines	-
Experimental design	Plot design	randomly selected plots
	Plot size	50 trees / 100 m ²
	Number of replications	4
Crop	Trials per crop	deciduous trees – 1 trial coniferous trees – 5 trials
	Varieties per crop	deciduous trees European beech <i>Fagus sylvatica</i> L. coniferous trees pine <i>Pinus sylvestris</i> L.
	Planting data	2016, 2017
Application	Crop stage (BBCH) at application	autumn, BBCH 97
	Timing Pest stage at application	young and adult animals, pest stage not relevant date of application: 10.12.2018, 23.11.2018, 27.11.2018, 06.12.2018
	Number of applications Intervals between applications	1
	Spray volumes	not applicable
Assessment	Assessment types	number of plants damaged by wild game
	Assessment dates	before application, 24.01.2019 (45 DAT), 07.03.2019 (87 DAT), 23.04.2019 (135 DAT) (InHort) 07.12.2018 (14 DAT), 02.01.2019 (40 DAT), 04.03.2019 (101 DAT), 08.04.2019 (136 DAT), 14.05.2019 (172 DAT) (Eurofins) 11.12.2018 (14 DAT), 02.01.2019 (36 DAT), 04.03.2019 (97 DAT), 10.04.2019 (134 DAT), 14.05.2019 (168 DAT) (Eurofins) 21.12.2018 (15 DAT), 08.01.2019 (33 DAT), 13.01.2019 (97 DAT), 16.04.2019 (131 DAT), 11.05.2019 (156 DAT) (Eurofins)
Other relevant information	Soil type	rusty soil, sand
	Planting norm	0.9 m x 1.5 m (InHort) 0.7 m x 1.5 m (InHort) 1.2 m (10 000 plants/ha) (Eurofins) 1.0 m (12 000 plants/ha) (Eurofins)
Bark stripping		
Guidelines	General guidelines	EPPO PP 1/152, EPPO PP 1/181 (2)
	Specific guidelines	-
Experimental	Plot design	randomly selected plots

design	Plot size	50 trees
	Number of replications	4
Crop	Trials per crop	deciduous trees – 1 trial coniferous trees – 5 trials
	Varieties per crop	deciduous trees European beech <i>Fagus sylvatica</i> L. coniferous trees pine <i>Pinus sylvestris</i> L.
	Planting data	1997, 2002, 2005, 2008, 2011
Application	Crop stage (BBCH) at application	autumn, BBCH 97
	Timing Pest stage at application	young and adult animals, pest stage not relevant date of application: 10.12.2018, 23.11.2018, 27.11.2018, 06.12.2018
	Number of applications Intervals between applications	1
	Spray volumes	not applicable
Assessment	Assessment types	number of plants damaged by wild game
	Assessment dates	before application, 25.01.2019 (46 DAT), 07.03.2019 (87 DAT), 23.04.2019 (135 DAT) (InHort) 02.01.2019 (40 DAT), 04.03.2019 (101 DAT), 08.04.2019 (136 DAT), 05.06.2019 (194 DAT) (Eurofins) 04.01.2019 (38 DAT), 04.03.2019 (97 DAT), 10.04.2019 (134 DAT), 05.06.2019 (190 DAT) (Eurofins) 08.01.2019 (33 DAT), 16.03.2019 (100 DAT), 16.04.2019 (131 DAT), 10.06.2019 (186 DAT) (Eurofins)
Other relevant information	Soil type	rusty soil, sand
	Planting norm	0.9 m x 1.5 m (InHort) 0.7 m x 1.5 m (InHort) 1.2 m (10 000 plants/ha) (Eurofins)

A total of 6 trials were carried out to evaluate the efficacy of Repentol 6 PA for the control of games browsing damage of deciduous trees (1 trial) and coniferous trees (5 trials). All trials have been conducted in season 2018/2019.

A total of 6 trials were carried out to evaluate the efficacy of Repentol 6 PA for the control of games bark stripping of deciduous trees (1 trial) and coniferous trees (5 trials). All trials have been conducted in season 2018/2019.

Comments of zRMS:	The field trials were performed in accordance with EPPO guidelines and in all trials GEP rules were recognized. The field experiments of the repellent – Repentol 6 PA were carried out by the recognised institutes. The testing unit has been mandated to conduct research in the field of efficacy of plant protection products by the Chief Inspector of Plant Health and Seed Inspection and are officially GEP recognised. The number of efficacy of the product presented in this dossier is sufficient for registration the tested product in Poland and in accordance with EPPO PP/226 (6–15 trials). Applicant presented 6 trials against browsing damage of deciduous (1 trial) and coniferous trees (5 trials) and against bark stripping of deciduous (1 trial) and
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	coniferous trees (5 trials) carried out in one growing season (2018/2019). Only one growing season is seemed to be acceptable since Repentol 6 PA is already registered on the Polish market (with higher dose) and sand quartz is a low risk substance, so Applicant submit more efficacy trials (6 for each use) than is required (2-3). During efficacy trials three different dose were studied against damage browsing: 2 kg/1000 trees; 2,5 kg/1000 trees; 4,0 kg/1000 trees and against browsing stripping: 6 kg/1000 trees; 8 kg/1000 trees; 10 kg/1000 trees. Recommended dose for browsing stripping is 8-10 kg/1000 trees and against browsing damage: 2,5-4,0 kg/1000 trees. All necessary information's about methodology of efficacy trials were presented by Applicant above. Assessment for renewal authorisation: No additional data are required. Since previously authorised rates were much higher and are no longer valid, this document included only currently authorised rates. This document summarizes information concerning lower efficient application rates of Repentol 6 PA regarding browsing damages caused by wild game and efficacy of Repentol 6 PA in protection of deciduous and coniferous trees in forestry against barks stripping by wild game.
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Table 3.2-11: Efficacy trials results

Browsing damage							
Test report	Harmful organism/ weed species or intended use	Trees damaged in control at assessment	Repentol 6 PA	Repentol 6 PA	Repentol 6 PA	Cervacol Extra PA	Remarks
			2.0 kg/ 1000 trees	2.5 kg/ 1000 trees	4.0 kg/ 1000 trees	2.0 kg/ 1000 trees	
(1) ZOPRS/15/ 2018 2018/2019 InHort	games	0	-	-	-	-	Assessment date 24.01.2019
		4.25 trees	83.3%	75.0%	87.5%	91.7%	Assessment date 07.03.2019
		4.5 trees	83.3%	70.8%	83.3%	91.7%	Assessment date 23.04.2019
(2) ZOPRS/15/ 2018 2018/2019 InHort	games	2.0 trees	62.5%	87.5%	100.0%	100.0%	Assessment date 24.01.2019
		2.75 trees	60.4%	72.9%	79.2%	87.5%	Assessment date 07.03.2019
		2.75 trees	39.6%	72.9%	70.8%	87.5%	Assessment date 23.04.2019
(3) ZOPRS/15/ 2018 2018/2019 InHort	games	5.75 trees	79.2%	84.2%	83.3%	100.0%	Assessment date 24.01.2019
		8.5 trees	72.2%	69.0%	72.3%	85.6%	Assessment date 07.03.2019
		8.75 trees	64.0%	69.2%	72.5%	85.6%	Assessment date 23.04.2019
S18-07559- 01 2018-2019 Eurofins	games	0	0	0	0	0	Assessment date 07.12.2018
		0	0	0	0	0	Assessment date 02.01.2019
		0	0	0	0	0	Assessment date 04.03.2019
		15.27% (11.8 trees)	90.23%	92.35%	96.01%	95.49%	Assessment date 08.04.2019

		24.26% (18.8 trees)	71.31%	86.36%	92.97%	90.82%	Assessment date 14.05.2019
S18-07559-02 2018-2019 Eurofins	games	0	0	0	0	0	Assessment date 11.12.2018
		0	0	0	0	0	Assessment date 02.01.2019
		0	0	0	0	0	Assessment date 04.03.2019
		15.09% (12.5 trees)	87.49%	85.02%	86.8%	87.93%	Assessment date 10.04.2019
		28.1% (23.3 trees)	76.6%	85.18%	83.39%	85.55%	Assessment date 14.05.2019
S18-07559-03 2018-2019 Eurofins	games	0	0	0	0	0	Assessment date 21.12.2018
		0	0	0	0	0	Assessment date 08.01.2019
		5.37% (5.3 trees)	57%	75%	70.89%	61.47%	Assessment date 13.03.2019
		16.6% (15.3 trees)	80.83%	94.94%	85.56%	92.77%	Assessment date 16.04.2019
		34.89% (31 trees)	77.79%	87.88%	90.76%	89.54%	Assessment date 11.05.2019
Bark stripping							
Test report	Harmful organism/ weed species or intended use	Trees damaged in control at assessment	Repentol 6 PA	Repentol 6 PA	Repentol 6 PA	Cervacol Extra PA	Remarks
			6.0 kg/ 1000 trees	8.0 kg/ 1000 trees	10.0 kg/ 1000 trees	10.0 kg/ 1000 trees	
(4) ZOPRS/15/ 2018 2018/2019 InHort	games	0	-	-	-	-	Assessment date 25.01.2019
		1.25 trees	62.5%	25.0%	75.0%	62.5%	Assessment date 07.03.2019
		2.25 trees	31.25%	43.75%	81.25%	43.75%	Assessment date 23.04.2019
(5) ZOPRS/15/ 2018 2018/2019 InHort	games	0 trees	-	-	-	-	Assessment date 25.01.2019
		2.0 trees	75.0%	62.5%	87.5%	75.0%	Assessment date 07.03.2019
		5.0 trees	72.3%	77.3%	91.9%	77.3%	Assessment date 23.04.2019
(6) ZOPRS/15/ 2018 2018/2019 InHort	games	0 trees	-	-	-	-	Assessment date 25.01.2019
		2.25 trees	75.0%	66.7%	91.7%	79.2%	Assessment date 07.03.2019
		3.5 trees	64.6%	70.8%	87.5%	70.8%	Assessment date 23.04.2019
S18-07558-01 2018-2019 Eurofins	games	0	-	-	-	-	Assessment date 02.01.2019
		7.81% (2.5 trees)	100%	100%	100%	100%	Assessment date 04.03.2019
		23.44% (7.5)	83.72%	95.35%	97.67%	97.67%	Assessment date 08.04.2019
		48.44% (15.5 trees)	76.52%	95.65%	96.52%	97.39%	Assessment date 05.06.2019
S18-07558-02	games	0	-	-	-	-	Assessment date 04.01.2019

2018-2019 Eurofins		18.75% (6 trees)	90%	100%	100%	100%	Assessment date 04.03.2019
		31.25% (10 trees)	77.97%	94.92%	96.61%	94.92%	Assessment date 10.04.2019
		62.5% (20 trees)	79.68%	94.12%	97.33%	96.79%	Assessment date 05.06.2019
S18-07558- 03 2018-2019 Eurofins	games	0	-	-	-	-	Assessment date 08.01.2019
		10.16% (3.3 trees)	100%	100%	100%	100%	Assessment date 16.03.2019
		26.56% (8.5 trees)	77.78%	92.06%	96.83%	98.41%	Assessment date 16.04.2019
		49.22% (15.8 trees)	79.53%	87.4%	92.13%	92.91%	Assessment date 10.06.2019

Table 3.2-6: Efficacy of Repentol 6 PA at the time of assessment with the highest pest pressure

Target	Grouping	Number of trials	Infestation in the untreated control (number of trees damaged)		Browsing damage - % control								No of trials where Repentol 6 PA is >, <, = compared to standard(s) (3% tolerance)
					Repentol 6 PA 2.0 kg/1000 trees		Repentol 6 PA 2.5 kg/1000 trees		Repentol 6 PA 4.0 kg/1000 trees		Cervacol Extra PA 2.0 kg/1000 trees		
			Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	
games	all	6	14.85	2.75-31	68.77	39.6-83.3	78.72	69.2-87.88	82.29	70.8-92.97	88.45	85.55-91.7	Repentol 6 PA: - 2.0 kg/1000 trees 0 trials > 0 trials = 6 trials < - 2.5 kg/1000 trees 0 trials > 2 trials = 4 trials < - 4.0 kg/1000 trees 0 trials > 3 trials = 3 trials <
Target	Grouping	Number of trials	Infestation in the untreated control (number of trees damaged)		Bark stripping - % control								No of trials where Repentol 6 PA is >, <, = compared to standard(s)
					Repentol 6 PA 6.0 kg/1000 trees		Repentol 6 PA 8.0 kg/1000 trees		Repentol 6 PA 10.0 kg/1000 trees		Cervacol Extra PA 10.0 kg/1000 trees		
			Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	Mean	Min & Max	
games	all	6	10.34	2.25-20	67.31	31.25-79.68	78.17	43.75-95.65	91.11	81.25-97.33	79.82	43.75-97.39	Repentol 6 PA: - 6.0 kg/1000 trees 0 trials > 0 trials = 6 trials < - 8.0 kg/1000 trees 0 trials > 5 trials = 1 trial < - 10.0 kg/1000 trees 3 trials > 3 trials = 0 trials <

The biting damage caused by games in Poland in season 2018/2019 was lower than usual due to mild winter temperatures and lack of snow what caused sufficient level of food supply for the game. Such situation influenced results of efficacy trials, which were lower than expected. Efficacy of Repentol 6 PA was comparable to Cervacol Extra PA, this comparability allows to draw a conclusion of efficacy of tested product.

6 efficacy trials for controlling of browsing damage were performed in Poland. Data summarised in above tables demonstrated that the efficacy of the Repentol 6 PA at rate of 2.0 kg/1000 trees was 68.77% and was slightly lower than efficacy of reference product Cervacol Extra PA. Repentol 6 PA at two higher rates i.e. 2.5 and 4.0 kg/1000 trees was 78.72% and 82.29% and was similar to the efficacy of registered reference standard Cervacol Extra PA. Efficacy of reference product applied at rate of 2.0 kg/1000 trees was 88.45%.

6 efficacy trials for controlling of bark stripping were performed in Poland. Data summarised in above tables demonstrated that the efficacy of the Repentol 6 PA at rate of 6.0 kg/1000 trees was 67.31% and was slightly lower than efficacy of reference product Cervacol Extra PA. Repentol 6 PA at two higher rates i.e. 8.0 and 10.0 kg/1000 trees was 78.17% and 91.11% and was similar to the efficacy of registered reference standard Cervacol Extra PA. Efficacy of reference product applied at rate of 10.0 kg/1000 trees was 79.82%.

Minor use

Not relevant.

Yield (and relevant quality indicators), from efficacy trials (in the presence of challenging pest populations)

Not relevant.

Summary and conclusion

Repentol 6 PA contains active substance quartz sand that is known of its mechanical mode of action. Game repellents containing quartz sand are used in EU for many years. Quartz sand is also substance included in Annex II of Commission Regulation (EC) No 889/2008 of 5 September 2008 *laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control*.

Regarding above in case of registration of Repentol 6 PA in Poland or amendment of existing registration in Poland, number of efficacy trials (6 trials for controlling of browsing damage and 6 trials for controlling of bark stripping) should be sufficient for positive evaluation. Usually it is recommended to conduct trials in min. 2 seasons, however Repentol 6 PA as well as its active substance are well known of its mode of action as well as high efficacy so it was concluded that number of seasons may also be reduced. Increased number of submitted efficacy trials (6 trials for controlling of browsing damage and 6 trials for controlling of bark stripping) in comparison to required (2-3 trials) also allows reduce number of experimental seasons.

Results of efficacy trials for controlling of browsing damage performed indicate high efficacy of Repentol 6 PA applied in application rates 2.5-4 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 2.5-4 kg/1000 trees (0.75-1.2 kg as/1000 trees) was above 78%. Regarding above results of Repentol 6 PA, results included in Core Assessment and current authorisation of Repentol 6 PA in Poland, it can be concluded that efficient application rates of Repentol 6 PA may be changed for 2.5-4 kg/1000 trees.

Results of efficacy trials for controlling of bark stripping performed indicate high efficacy of Repentol 6 PA applied in application rates 8-10 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 8-10 kg/1000 trees (2.4-3.0 kg as/1000 trees) was above 78%.

Regarding above results recommended application rates of Repentol 6 PA for controlling of browsing damage can be reduced till 2.5-4 kg/1000 trees. Additionally, new studies of Repentol 6 PA for controlling of bark stripping allows to conclude that product is efficient in rates of 8-10 kg/1000 trees.

Comments of zRMS:	EFFICACY AGAINST BROWSING DAMAGE:				
	<i>Trial report</i>	<i>2,0 kg/1000 trees</i>	<i>2,5kg/1000 trees</i>	<i>4,0 kg/1000 trees</i>	<i>Standard ref. product</i>
	(1) ZOPRS/15/2018 2018/2019 InHort	83,30 %	70,80 %	83,30 %	91,70 %
	(2) ZOPRS/15/2018 2018/2019 InHort	39,60 %	72,90 %	70,80 %	87,50 %
	(3) ZOPRS/15/2018 2018/2019 InHort	64,00 %	69,20 %	72,50 %	85,50 %
	S18-07559-01 2018-2019 Eurofins	71,31 %	86,36 %	92,97 %	90,82 %
	S18-07559-02 2018-2019 Eurofins	76,60 %	85,18 %	83,39%	85,55 %
	S18-07559-03 2018-2019 Eurofins	77,79 %	87,88 %	90,76 %	89,54 %
	<i>average from 6 trials</i>	68,77 %	78,72	82,29	88,44
	On the basis on submitted trials it can be concluded that efficacy of tested product – Repentol 6 PA was increasing with increasing dose. At dose 4,0 kg/1000 tress Repentol 6 PA was characterized by similar efficacy to standard reference product. However, also at lower dose (2,5 kg/1000 trees) product has good efficiency. So, rate of doses: 2,5-4,0 kg/1000 tress should been recommended to use against browsing damage. However, the higher dose should be used in the case of high pest pressure.				
	EFFICACY AGAINST BARK STRIPPING:				
	<i>Trial report</i>	<i>6,0 kg/1000 trees</i>	<i>8,0 kg/1000 trees</i>	<i>10,0 kg/1000 trees</i>	<i>Standard ref. product</i>
	(4) ZOPRS/15/2018 2018/2019	31,25	43,75	81,25	53,75

	InHort				
	(5) ZOPRS/15/2018 2018/2019 InHort	72,30	77,30	91,90	77,30
	(6) ZOPRS/15/2018 2018/2019 InHort	64,60	70,80	87,50	70,80
	S18-07558-01 2018-2019 Eurofins	76,52	95,65	96,32	97,33
	S18-07558-02 2018-2019 Eurofins	79,68	94,12	97,33	96,79
	S18-07558-03 2018-2019 Eurofins	79,53	87,40	92,13	92,91
	average from 6 trials	67,31	78,17	91,07	81,48
On the basis on submitted trials it can be concluded that efficacy of tested product – Repentol 6 PA was increasing with increasing dose. At dose 8,0 kg/1000 tress Repentol 6 PA was characterized by similar efficacy to standard reference product. However, at higher dose (10,0 kg/1000 trees) product has better efficiency than standard reference product. So, rate of doses: 8,0-10,0 kg/1000 tress should been recommended to use against bark stripping. However, the higher dose should be used in the case of high pest pressure. Efficacy trials were correctly presented and assessed by Applicant. So, ZRMs agree with summary and conclusion presented by Applicant: • <i>Results of efficacy trials for controlling of browsing damage performed indicate high efficacy of Repentol 6 PA applied in application rates 2.5-4 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 2.5-4 kg/1000 trees (0.75-1.2 kg as/1000 trees) was above 78%. Regarding above results of Repentol 6 PA, results included in Core Assessment and current authorisation of Repentol 6 PA in Poland, it can be concluded that efficient application rates of Repentol 6 PA may be changed for 2.5-4 kg/1000 trees.</i> • <i>Results of efficacy trials for controlling of bark stripping performed indicate high efficacy of Repentol 6 PA applied in application rates 8-10 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 8-10 kg/1000 trees (2.4-3.0 kg as/1000 trees) was above 78%.</i> • <i>Regarding above results recommended application rates of Repentol 6 PA for controlling of browsing damage can be reduced till 2.5-4 kg/1000 trees. Additionally, new studies of Repentol 6 PA for controlling of bark stripping allows to conclude that product is efficient in rates of 8-10 kg/1000 trees.</i>					

	Assessment for renewal authorisation: This document summarizes information concerning lower efficient application rates of Repentol 6 PA / Repentol 6 PA Bis regarding browsing damages caused by wild game and efficacy of Repentol 6 PA / Repentol 6 PA Bis in protection of deciduous and coniferous trees in forestry against barks stripping by wild game. Efficacy of dose reduced doses is presented above: •Results of efficacy trials for controlling of browsing damage performed indicate high efficacy of Repentol 6 PA applied in application rates 2.5-4 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 2.5-4 kg/1000 trees (0.75-1.2 kg as/1000 trees) was above 78%. Regarding above results of Repentol 6 PA, results included in Core Assessment and current authorisation of Repentol 6 PA in Poland, it can be concluded that efficient application rates of Repentol 6 PA may be changed for 2.5-4 kg/1000 trees. •Results of efficacy trials for controlling of bark stripping performed indicate high efficacy of Repentol 6 PA applied in application rates 8-10 kg/1000 trees. Efficacy of Repentol 6 PA applied in rates 8-10 kg/1000 trees (2.4-3.0 kg as/1000 trees) was above 78%. •Regarding above results recommended application rates of Repentol 6 PA for controlling of browsing damage can be reduced till 2.5-4 kg/1000 trees. Additionally, new studies of Repentol 6 PA for controlling of bark stripping allows to conclude that product is efficient in rates of 8-10 kg/1000 trees. Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project. Applicant DCR Sp. z o.o. should address the issue that some of the ingredients in the formulation 'Repentol 6 PA' are approved or have been approved as pesticide active substances. The applicant should justify that these ingredients do not function as active substances, but as co-formulants (relevant for the representative uses evaluated for 'Repentol 6 PA'; see Section 1) (https://doi.org/10.2903/j.efsa.2022.7552). By the agreement with the MRiRW regarding the phys.-chem. section 'Physical, chemical and technical properties of the plant protection product' (Update date: 05.09.2023) point 8: 'An ingredient which is an active substance but which is not stated as an active substance in the formulation of the plant protection product but has another role shall be considered as a co-formulant. Where such a situation is identified, this information must be verified by the efficacy section for action and forwarded to the other sections.' The active substances that are treated as co-formulants by the Applicant are talc oil and calcium carbonate. In products designed to repel game animals and lagomorphs, calcium carbonate and talc oil are generally considered as follows: – <i>calcium carbonate</i> – it might be considered a co-formulant if its role is primarily to enhance stability, consistency, or application of other active ingredients without providing direct repellent properties. Repellents are substances that deter animals, typically through smell, taste, or irritating properties. Calcium carbonate does not have such properties and is not used to repel animals. – <i>talc oil</i> – is primarily treated as a co-formulant. Its main function is to improve the handling, spreading, and adhesion of the formulation. It does not possess inherent repellent properties against lagomorphs and game animals and is used to support the effectiveness of the actual active ingredient (sand quartz). San quart is an active compound of Repentol 6 PA / Repentol 6 PA Bis because of its direct impact on creating physical barriers that deter animals. In summary, ZRMs agree with the Applicant that sand quartz is an active
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	compound in Repentol 6 PA / Repentol 6 PA Bis. As, Repentol 6 PA / Repentol 6 PA Bis is evaluated only for renewal registration in line to Art. 43 and no changes were made in GAP. So, efficacy section is evaluated only possibility of developing of resistance against those PPPs.
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3.3 Information on the occurrence or possible occurrence of the development of resistance (KCP 6.3)

Not relevant. Repentol 6 PA contains quartz sand as an active substance that has mechanical mode of action. Neither occurrence of resistance nor development of resistance is probable. Additionally, possible occurrence of resistance of Repentol 6 PA was evaluated in Core Assessment. Please refer to the Core Assessment (zRMS: Poland, December 2016).

Comments of zRMS:	Statement accepted by Evaluator. The development of resistance is not probable due to mechanical mode of action of sand quartz. <u>Assessment for renewal authorisation:</u> The development of resistance to sand quartz repellents used against games and lagomorphs is a complex topic. The concept of resistance is more commonly associated with chemical repellents or pesticides. Sand quartz, being a natural material, is less likely to lead to resistance compared to synthetic chemical repellents. Animals usually respond to behavioural cues rather than developing a physiological resistance. While resistance in the traditional sense may not occur, animals may adapt their feeding behaviours over time. For example, if a specific texture or barrier is consistently present, animals may learn to navigate or bypass it, though this is not true resistance. Variability in environmental conditions, such as moisture levels and availability of alternative food sources, can affect how effective sand quartz repellents remain over time. Animals may be less inclined to resist barriers if food scarcity drives them to explore all options. To mitigate potential behavioural adaptation, it can be effective to combine sand quartz products with other deterrence strategies, such as motion-activated devices or scent repellents. Regularly checking and maintaining the protective elements can help ensure that they remain effective. As wear occurs, reapplication of the material may be necessary. Ongoing research and monitoring of animal behaviour can help identify if adaptations are occurring, allowing for adjustments to management strategies. In summary, while true resistance to sand quartz repellents is unlikely, adaptive behaviours in lagomorphs and game animals may occur. Implementing diverse strategies and maintaining effectiveness is key to successful deterrence. While sand quartz can serve as a deterrent, it may not be entirely effective on its own. The use of combination strategies, such as physical barriers (fencing), other repellents or habitat management, might be necessary for more robust protection. Considering the varying persistence and adaptability of games and lagomorphs, relying solely on sand quartz result in inconsistent protection. Resistance in the form of behavioural adaptation by the animals is possible but not guaranteed.
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3.4 Adverse effects on treated crops (KCP 6.repellents4)

Information on trials submitted (3.4: Adverse effects on treated crops)

Table 3.4-1: Presentation of trials (selectivity trials)

Crop*	Country	Type of trial**	Number of trials (number of valid trials)	Years	GEP, non-GEP, official***	Comments (any other relevant information)
Browsing damage						
deciduous and coniferous trees	PL	E	6	2018/2019	GEP	-
TOTAL	-	-	6	2018/2019	GEP	-
Bark stripping						
deciduous and coniferous trees	PL	E	6	2018/2019	GEP	-
TOTAL	-	-	6	2018/2019	GEP	-

* According to the GAP table

** E=efficacy trials with selectivity observation, S = selectivity trial, Y = trial with yield assessment, Q = trial with quality assessment, T = trial on the basis of the study of impact on transformation process (TP: Physical transformation, TF: transformation involving microbial fermentation), P = trial with assessment of impact on propagation

*** Official: carried out by a national official organisation

Table 3.4-2: Presentation of reference standards used in trials (selectivity trials)

Crop(s)	Reference standard	Country(ies) where the product is registered ⁽¹⁾	Authorization number	Active substance(s)	Formulation		Registered application rate ⁽³⁾	Application rate in trials (per treatment)	Remarks ⁽⁴⁾
					Type ⁽²⁾	Concentration of a.s.			
Browsing damage									
deciduous and coniferous trees	Cervacol Extra PA	PL	R-85/2014	quartz sand	PA	251 g/kg	2-5 kg/1000 trees	2.0 kg/1000 trees	-
Bark stripping									
deciduous and coniferous trees	Cervacol Extra PA	PL	R-85/2014	quartz sand	PA	251 g/kg	10-14 kg/1000 trees	10.0 kg/1000 trees	-

(1) only on use(s) applied for (with the test product)

(2) e.g. WP (wetttable powder), EC (emulsifiable concentrate), etc.

(3) Dose / dose range authorized in the country

(4) Other relevant information (e.g. uses, number of applications, spray volume, method of application...)

3.4.1 Phytotoxicity to host crop (KCP 6.4.1)

Not relevant. No phytotoxicity studies were performed since Repentol 6 PA is not a repellent. Phytotoxicity symptoms were evaluated in efficacy trials. No phytotoxic effects on treated plants were observed at application rate 1N.

Repentol 6 PA phytotoxicity in higher application rates was evaluated in the Core Assessment prepared by zRMS Poland in December 2016) Repentol 6 PA applied already registered application rates of 10-15 kg/1000 trees does not pose phytotoxicity to treated crops. Application in lower rates will not pose phytotoxic effects as well. Nonetheless, phytotoxicity was evaluated in new efficacy trials. Summary is included in table below.

Table 3.4-3: Phytotoxicity of product

Number of trials with...		Selectivity trials (0 trials)				Efficacy trials (6 trials)	
		Test product		Standard		Test product	Standard
		N	2N (or other)	N	2N (or other)	N	N
Browsing damage							
Maximum of phytotoxicity recorded during the trials	0% to 5%	-	-	-	-	6	6
	>5% to 10%	-	-	-	-	-	-
	>10% to 15%	-	-	-	-	-	-
	>15 %	-	-	-	-	-	-
Level of symptoms at the last assessments	0% to 5%	-	-	-	-	6	6
	>5% to 10%	-	-	-	-	-	-
	>10% to 15%	-	-	-	-	-	-
	>15 %	-	-	-	-	-	-
Bark stripping							
Maximum of phytotoxicity recorded during the trials	0% to 5%	-	-	-	-	6	6
	>5% to 10%	-	-	-	-	-	-
	>10% to 15%	-	-	-	-	-	-
	>15 %	-	-	-	-	-	-
Level of symptoms at the last assessments	0% to 5%	-	-	-	-	6	6
	>5% to 10%	-	-	-	-	-	-
	>10% to 15%	-	-	-	-	-	-
	>15 %	-	-	-	-	-	-

6 efficacy trials for controlling of browsing damage were carried out on deciduous trees (1 trials) and coniferous trees (5 trials) in Poland in 2018/2019 season. Phytotoxicity evaluation was performed in each trial. No phytotoxic effects of Repentol 6 PA used in rates of 2-4 kg/1000 plants were observed on treated crops. Reference product Cervacol Extra PA did not cause phytotoxic effects on treated crops as well.

6 efficacy trials for controlling of bark stripping were carried out on deciduous trees (1 trials) and coniferous trees (5 trials) in Poland in 2018/2019 season. Phytotoxicity evaluation was performed in each trial. No phytotoxic effects of Repentol 6 PA used in rates of 6-10 kg/1000 plants were observed on treated crops. Reference product Cervacol Extra PA did not cause phytotoxic effects on treated crops as well.

Comments of zRMS:	Statement accepted. No phytotoxicity symptoms were observed during efficacy trials. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.4.2 Effect on the yield of treated plants or plant product (KCP 6.4.2)

Not relevant. Repentol 6 PA is to be used in forestry.

Comments of zRMS:	Studies about effect on the yield of treated plants or plant product are not required, due to fact that Repentol 6 PA will be used in forestry. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.4.3 Effects on the quality of plants or plant products (KCP 6.4.3)

Not relevant. Repentol 6 PA is to be used in forestry.

Comments of zRMS:	Studies about effect on the quality of treated plants or plant product are not required, due to fact that Repentol 6 PA will be used in forestry. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.4.4 Effects on transformation processes (KCP 6.4.4)

Not relevant. Repentol 6 PA is to be used in forestry.

Comments of zRMS:	Studies about effects on transformation processes are not required, due to fact that Repentol 6 PA will be used in forestry. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of
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	Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.4.5 Impact on treated plants or plant products to be used for propagation (KCP 6.4.5)

Not relevant. Repentol 6 PA is to be used in forestry.

Summary and conclusion

No phytotoxicity studies were performed since Repentol 6 PA is neither herbicide not regulator. Phytotoxicity was observed in efficacy trials. Adverse effects and phytotoxicity effects of Repentol 6 PA were observed in 6 efficacy trials for the control of games browsing damage and 6 efficacy trials for the control of games bark stripping. All trials were performed in Poland in 2018/2019 season. No phytotoxic effects of Repentol 6 PA used in rates of 2-4 kg/1000 plants and 6-10 kg/1000 were observed.

Additionally, phytotoxicity and adverse effects of Repentol 6 PA with higher application rates was evaluated in Core Assessment. Please refer to the Core Assessment (zRMS: Poland, December 2016).

Comments of zRMS:	Studies about impact on treated plants or plant products to be used for propagation are not required, due to fact that Repentol 6 PA will be used in forestry. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.5 Observations on other undesirable or unintended side-effects (KCP 6.5)

3.5.1 Impact on succeeding crops (KCP 6.5.1)

Not relevant. Repentol 6 PA is to be used in forestry.

Comments of zRMS:	Studies about impact on succeeding crops are not required, due to fact that Repentol 6 PA will be used in forestry. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.5.2 Impact on other plants including adjacent crops (KCP 6.5.2)

Not relevant. Repentol 6 PA is to be used in forestry. The proposed application manner of Repentol 6 PA is annual coating hence no drift occurs and there is no risk for adjacent crops.

Tank cleaning

Not relevant. The proposed application manner of Repentol 6 PA is annual coating hence no drift occurs and there is no risk for adjacent crops.

Comments of zRMS:	Studies about impact on other plants including adjacent crops are not required, due to fact that Repentol 6 PA will be used in forestry. Also, no drift occurs, so there is no risk for adjacent crops Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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3.5.3 Effects on beneficial and other non-target organisms (KCP 6.5.3)

Not relevant. No studies on the toxicity to non-target organisms have been carried out with quartz sand and Repentol 6 PA. Further data on the Repentol 6 PA is also not considered essential since it is to be used manually as a coating onto trees. Additionally, quartz sand naturally occurs in the environment and hence exposure of non-target organisms is considered negligible.

Comments of zRMS:	Statement accepted. Quartz sand naturally occurs in the environment and hence exposure of non-target organisms is considered negligible. Assessment for renewal authorisation: Information from previous assessments is still valid for renewal registration of Repentol 6 PA / Repentol 6 PA Bis in line to article 43. In the opinion of ZRMs, Repentol 6 PA / Repentol 6 PA Bis can be renewed for professional and unprofessional uses and minor uses according to acceptable GAP table and label project.
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Compatibility with current management practices including IPM

Not relevant.

Summary and conclusion

Repentol 6 PA is to be used in forestry and the proposed application manner is annual coating so no impact on succeeding and adjacent crops is expected. The active substance quartz sand naturally occurs in the environment and hence exposure of non-target organisms is considered negligible.

3.6 Other/special studies

Not relevant. No other/special studies are provided.

3.7 List of test facilities including the corresponding certificates

Table 3.7-1: List of test facilities

Test facility	Address	Certificate (Yes or No)
InHort Instytut Ogrodnictwa	ul. Konstytucji 3 Maja 1/3 96-100 Skierniewice Poland	Yes
Eurofins Agrosience Services Sp z o.o.	ul. Parkowa 6 64-530 Kazimierz Poland	Yes

Appendix 1 Lists of data considered in support of the evaluation

Tables considered not relevant can be deleted as appropriate.

MS to blacken authors of vertebrate studies in the version made available to third parties/public.

List of data submitted by the applicant and relied on

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
KCP 6.2/01 KCP 6.2/02 KCP 6.2/03	Sekrecka M.	2019	Badanie skuteczności działania preparatu Repentol 6 PA (piasek kwarcowy 300 g/kg) w zabezpieczaniu drzew w lasach przed zgryzaniem przez zwierzynę łowną (jeleniowate) Company Report No: ZORPS/15/2018 Source: InHort, Instytut Ogrodnictwa, Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP 6.2/04	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as repellent against browsing damage in Forest, 3 Sites Poland 2018/2019 Company Report No: S18-07559-01 Source: Eurofins Agrosience Service Sp. z o.o., Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP 6.2/05	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as repellent against browsing damage in Forest, 3 Sites Poland 2018/2019 Company Report No: S18-07559-02 Source: Eurofins Agrosience Service Sp. z o.o., Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as repellent against browsing damage in Forest, 3 Sites	N	DCR

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
6.2/06			Poland 2018/2019 Company Report No: S18-07559-03 Source: Eurofins Agroscience Service Sp. z o.o., Poland GEP Unpublished		Sp. z o.o. S.A.
KCP 6.2/07 KCP 6.2/08 KCP 6.2/09	Warabieda W.	2019	Badanie skuteczności działania preparatu Repentol 6 PA (piasek kwarcowy 300 g/kg) w zabezpieczaniu drzew w lasach przed spalowaniem przez zwierzynę łowną (jeleniowate) Company Report No: ZORPS/15/2018 Source: InHort, Instytut Ogrodnictwa, Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP 6.2/10	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as Repellent against peeling of bark damage in Forest, 3 Site Poland 2018/2019 Company Report No: S18-07558-01 Source: Eurofins Agroscience Service Sp. z o.o., Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP 6.2/11	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as Repellent against peeling of bark damage in Forest, 3 Site Poland 2018/2019 Company Report No: S18-07558-02 Source: Eurofins Agroscience Service Sp. z o.o., Poland GEP Unpublished	N	DCR Sp. z o.o. S.A.
KCP 6.2/12	Różalski K.	2019	Determination of Efficacy of Repentol 6 PA as Repellent against peeling of bark damage in Forest, 3 Site Poland 2018/2019 Company Report No: S18-07558-03 Source: Eurofins Agroscience Service Sp. z o.o., Poland GEP	N	DCR Sp. z o.o. S.A.

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
			Unpublished		

List of data submitted or referred to by the applicant and relied on, but already evaluated at EU peer review

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
-	-	-	-	-	-

The following tables are to be completed by MS

List of data submitted by the applicant and not relied on

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
-	-	-	-	-	-

List of data relied on not submitted by the applicant but necessary for evaluation

Data point	Author(s)	Year	Title Company Report No. Source (where different from company) GLP or GEP status Published or not	Vertebrate study Y/N	Owner
-	-	-	-	-	-