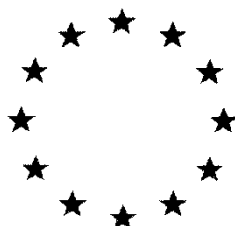


# *European Commission*



**Pilot project: Proposal for approbation of basic substances, in the context of  
Regulation (EC) N°1107/2009**

***VINEGAR***  
***Food grade***

**BASIC SUBSTANCE APPLICATION**

***February 2014***

# TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>1. PURPOSE OF THE APPLICATION</b> .....   | <b>4</b>  |
| <b>1.1. NAME AND ADDRESS OF APPLICANTS</b> .....   | <b>4</b>  |
| <b>2. IDENTITY OF THE SUBSTANCE/PRODUCT AS AVAILABLE ON THE MARKET AND PREDOMINANT USE</b> .....   | <b>5</b>  |
| <b>2.1. PREDOMINANT USES OF THE SUBSTANCE OUTSIDE PLANT PROTECTION</b> .....   | <b>5</b>  |
| <b>2.2. IDENTITY AND PHYSICAL CHEMICAL PROPERTIES OF THE SUBSTANCE AND PRODUCT TO BE USED</b> .....  | <b>5</b>  |
| 2.2.1. Common name of the substance and product and their synonyms/plant nomenclature .....  | 5         |
| 2.2.2. Chemical name with CAS, EEC and CIPAC numbers .....   | 6         |
| 2.2.3. Molecular and structural formula, molecular mass .....  | 8         |
| 2.2.4. Method or methods of manufacture of the substance and of the product .....  | 10        |
| 2.2.5. Description and specification of purity of the active substance and product .....   | 10        |
| 2.2.6. Identity of inactive isomers, impurities and additives .....  | 10        |
| 2.2.7. Methods of analysis .....   | 10        |
| <b>2.3. CURRENT, FORMER AND IN CASE PROPOSED TRADE NAMES OF SUBSTANCES/ PRODUCTS AS PUT ON THE MARKET</b> .....  | <b>11</b> |
| <b>2.4. MANUFACTURER OF THE SUBSTANCE/PRODUCTS</b> .....   | <b>11</b> |
| <b>2.5. TYPE OF PREPARATION OF THE SUBSTANCE/PRODUCT</b> .....   | <b>11</b> |
| <b>2.6. DESCRIPTION OF THE RECIPE FOR THE PRODUCT TO BE USED</b> .....   | <b>11</b> |
| <b>2.7. FUNCTION ON PLANT PROTECTION</b> .....   | <b>12</b> |
| <b>3. USES OF THE SUBSTANCE AND ITS PRODUCT</b> .....  | <b>12</b> |
| <b>3.1. FIELD OF USE</b> .....   | <b>12</b> |
| <b>3.2. EFFECTS ON HARMFUL ORGANISMS OR ON PLANTS</b> .....  | <b>13</b> |
| <b>3.3. SUMMARY OF INTENDED USES</b> .....   | <b>16</b> |
| 3.3.1. As fungicide .....  | 16        |
| 3.3.2. As bactericide .....  | 17        |
| <b>4. CLASSIFICATION AND LABELLING OF THE SUBSTANCE</b> .....  | <b>18</b> |
| <b>5. IMPACT ON HUMAN AND ANIMAL HEALTH</b> .....  | <b>18</b> |
| <b>5.1. EFFECTS HAVING RELEVANCE TO HUMAN AND ANIMAL HEALTH ARISING FROM EXPOSURE TO THE SUBSTANCE/ITS PRODUCTS OR TO IMPURITIES CONTAINED IN THE SUBSTANCE/PRODUCT OR THEIR TRANSFORMATION PRODUCTS</b> ..... | <b>18</b> |
| <b>5.2. TOXICOKINETICS AND METABOLISM IN HUMANS</b> .....  | <b>18</b> |
| <b>5.3. ACUTE TOXICITY</b> .....   | <b>18</b> |
| <b>5.4. SHORT-TERM TOXICITY</b> .....  | <b>18</b> |
| <b>5.5. GENOTOXICITY</b> .....   | <b>18</b> |

|   |           |
|---|-----------|
| <b>5.6. LONG-TERM TOXICITY .....</b>  | <b>19</b> |
| <b>5.7. REPRODUCTIVE TOXICITY.....</b>  | <b>19</b> |
| <b>5.8. NEUROTOXICITY.....</b>  | <b>19</b> |
| <b>5.9. TOXICITY STUDIES ON METABOLITES.....</b>  | <b>19</b> |
| <b>5.10. MEDICAL DATA: ADVERSE EFFECTS REPORTED IN HUMANS.....</b>  | <b>19</b> |
| <b>5.11. ADDITIONAL INFORMATION RELATED TO THERAPEUTIC PROPERTIES OR HEALTH CLAIMS.....</b>                                     | <b>19</b> |
| <b>5.12. ADDITIONAL INFORMATION RELATED TO USE AS FOOD.....</b>   | <b>19</b> |
| <b>5.13. ACCEPTABLE DAILY INTAKE, ACUTE REFERENCE DOSE, ACCEPTABLE OPERATOR EXPOSURE LEVEL .....</b>                            | <b>19</b> |
| <b>5.14. IMPACT ON HUMAN AND ANIMAL HEALTH ARISING FROM EXPOSURE TO THE ACTIVE SUBSTANCE OR IMPURITIES CONTAINED IN IT.....</b> | <b>20</b> |
| <b>6. RESIDUES.....</b>   | <b>20</b> |
| <b>7. FATE AND BEHAVIOUR IN THE ENVIRONMENT .....</b>   | <b>20</b> |
| <b>8. EFFECTS ON NON-TARGET SPECIES .....</b>   | <b>20</b> |
| <b>8.1. GENERAL CONSIDERATION:.....</b>   | <b>20</b> |
| 8.1.1. succinic acid.....   | 20        |
| 8.1.2. lactic acid .....  | 20        |
| 8.1.3. propionic acid.....  | 21        |
| 8.1.4. glycerol .....   | 21        |
| <b>8.2. EFFECTS ON TERRESTRIAL VERTEBRATES .....</b>  | <b>21</b> |
| 8.2.1. Acetic acid.....   | 21        |
| <b>8.3. EFFECTS ON AQUATIC ORGANISMS .....</b>  | <b>21</b> |
| 8.3.1. Acetic acid.....   | 21        |
| <b>8.4. EFFECTS ON BEES AND OTHER ARTHROPODS SPECIES .....</b>  | <b>22</b> |
| 8.4.1. Bees.....  | 22        |
| 8.4.2. Other athropods.....   | 22        |
| <b>8.5. EFFECTS ON EARTHWORMS AND OTHER SOIL MACRO-ORGANISMS .....</b>  | <b>22</b> |
| <b>8.6. EFFECTS ON SOIL MICRO-ORGANISMS.....</b>  | <b>22</b> |
| 8.6.1. Acetic acid.....   | 22        |
| <b>8.7. EFFECTS ON OTHER NON-TARGET ORGANISMS (FLORA AND FAUNA).....</b>  | <b>22</b> |
| <b>8.8. EFFECTS ON BIOLOGICAL METHODS OF SEWAGE TREATMENT.....</b>  | <b>23</b> |
| <b>9. OVERALL CONCLUSIONS WITH RESPECT OF ELIGIBILITY OF THE SUBSTANCE TO BE APPROVED AS BASIC SUBSTANCE .....</b>              | <b>23</b> |
| <b>ANNEX I LIST REFERENCES RELIED ON.....</b>   | <b>24</b> |

# " VINEGAR Food Grade "

## **1. PURPOSE OF THE APPLICATION**

*This report is submitted to support the application for the first approbation of Vinegar as a substance in the Parliament and Council Regulation (EC) 1107/2009 as a basic substance....*

### **1.1. NAME AND ADDRESS OF APPLICANTS**

**Name** Institut Technique de l'Agriculture Biologique

**Contact person :** Dr Patrice Marchand

**Telephone :** + 33 (0)1 40 04 50 75

**Fax :** + 33 (0)1 40 04 50 66

**Email :** [patrice.marchand@itab.asso.fr](mailto:patrice.marchand@itab.asso.fr)

**Address** 149 rue de Bercy  
75595 Paris cedex 12 France

**Contact person :** Laurence Fontaine

**Telephone :** + 33 (0)2.41.18.61.56

**Fax :** + 33 (0)2.41.18.60.21

**Email :** [Laurence.Fontaine@itab.asso.fr](mailto:Laurence.Fontaine@itab.asso.fr)

**Address** ITAB

## **2. IDENTITY OF THE SUBSTANCE/PRODUCT AS AVAILABLE ON THE MARKET AND PREDOMINANT USE**

### **2.1. PREDOMINANT USES OF THE SUBSTANCE OUTSIDE PLANT PROTECTION**

Vinegar is worldwide known as foodstuff for preservation and dressing. Naturally occurring and relatively inexpensive organic acids traditionally have been used as food preservatives. Whether naturally product during fermentation or intentionally added. These acids retard microbial growth and contribute desirable sensory properties to a number of foods. Acetic acid, historically diluted in the form of vinegar, has been utilized perhaps longer than any other preservative for its antimicrobial effect that couples food keeping-quality wholesomeness and safety. Reviews of vinegar contain historical information that couples the discovery of acetic acid to wine spillage. And since wine has been used for at least 1.000 years, vinegar probably has also been used that long (Nickol. 1979; Pederson. 1979). Early uses of vinegar were for medicinal purposes, such as wet compresses or consumption as a drink elixir (Nickol, 1979).

Because acetic acid is the predominant flavouring and anti-microbial component in vinegars, the following review will focus on the importance of this acid as a direct food additive or more recently as a food processing aid to decontaminate foods prior to distribution and consumption.

Vinegar is an acidic liquid (pH generally between 2 and 3) obtained by the oxidation of ethanol in alcoholic fermentation process acetic drinks. It is used in human food. Common vinegar has a concentration of about 5-8% acetic acid but the tartaric acid and citric acid are found in lower concentrations in natural vinegar.

---

**Nickol GB. 1979 Vinegar, In: Pepler HJ, Perlman D. Microbiology technology. 2<sup>nd</sup> ed. New York: Academic Press. p 155-172.**

---

**Pederson CS. 1979 Microbiology of food fermentation, 2<sup>nd</sup> ed. Westport: AVI Publishing Co. p 52.**

---

Vinegar is also use in cosmetics.

**European Commission 2006 Decision 2006/257/EC Commission Decision of 9 February 2006 amending Decision 96/335/EC establishing an inventory and a common nomenclature of ingredients employed in cosmetic products.**

---

### **2.2. IDENTITY AND PHYSICAL CHEMICAL PROPERTIES OF THE SUBSTANCE AND PRODUCT TO BE USED**

#### **Distilled vinegar**

The term "distilled vinegar" is something of a misnomer, because it is not produced by the distillation of vinegar, but rather, by the fermentation of distilled alcohol. The fermentate is then diluted to produce a colourless solution of about 5% to 8% acetic acid in water, with a pH of about 2.4. This is variously known as distilled spirit or "virgin" vinegar, or white vinegar, and is used for medicinal, laboratory, and cleaning purposes, as well as in cooking, baking, meat preservation, and pickling. The most common starting material in some regions, because of its low cost, is malt. In the United States, corn (maize) is the usual starting ingredient for most distilled vinegars.

#### **Spirit vinegar**

The term 'spirit vinegar' is sometimes reserved for the stronger variety (5% to 20% acetic acid) made from sugar cane.

#### **2.2.1. Common name of the substance and product and their synonyms/plant nomenclature**

Proposed name: *VINEGAR*

ISO common name (approved or proposed): VINEGAR

Synonyms: VINEGAR, Acetum (cosmetic), Common VINEGAR; vinaigre (French); eissig (German); aceto (Italian); azijn (Dutch), vinagre (Spanish)

VINEGAR, the substance, is a well-known and widespread food product.

In VINEGAR, the main active substance, is acetic acid, secondly active compounds are listed below .

## 2.2.2. Chemical name with CAS, EEC and CIPAC numbers

Chemical denomination is vinegar.

|                |                            |
|----------------|----------------------------|
| IUPAC:         | Acetic acid (vinegar ext.) |
| INCI:          | Vinegar                    |
| CAS:           | 90132-02-8                 |
| EINECS/ELINCS: | 290-419-7                  |

Constituents are:

| Component      | g/L (range)            | Component | Interval (mg / L) |
|----------------|------------------------|-----------|-------------------|
| acetic acid    | 44-56                  | P         | -                 |
| citric acid    | 0-0.56                 | Na        | -                 |
| tartaric acid  | 0-0.25                 | K         | 26.70-1800        |
| malic acid     | 0-0.2                  | Ca        | 9.60-200          |
| malonic acid   | 0-0.4                  | Mg        | 4.20-130          |
| succinic acid  | 0-1.1                  | Fe        | 1.95-10.50        |
| lactic acid    | 0-1.9                  | Cu        | 0.02 -0.35        |
| propionic acid | 0-0.55                 | Zn        | 0.01-7.90         |
| glycerol       | 0-1.5                  | Mn        | 0.10-9.83         |
| ethanol        | 0.13-0.32 <sup>£</sup> | Ni        | -                 |
|                |                        | Pb        | 0.013-0.265       |
|                |                        | Sn        | -                 |
|                |                        | Cd        | -                 |

£ °G.L.

**Aguiar A. de Alencar Nascimento R.A. Ferretti L.P. Gonçalves A.R. 2005 Determination of Organic Acids and Ethanol in Commercial Vinegars *Braz. J. Food Technol.*, 5° SIPAL**

For more details on monoatomic salts composition:

**AKPINAR-BAYIZIT Arzu, TURAN Murat Ali, YILMAZ-ERSAN Lutfiye, TABAN Nilgun 2010 Inductively Coupled Plasma Optical-Emission Spectroscopy Determination of Major and Minor Elements in Vinegar, *Notulae Botanicae Horti Agrobotanici Cluj-Napoca*, 38 (3), 64-68**

### 2.2.2.1. Acetic acid

Chemical denomination is ethanoic acid / acetic acid.

|                |               |
|----------------|---------------|
| IUPAC:         | ethanoic acid |
| CAS:           | 64-19-7       |
| EINECS/ELINCS: | 200-580-7     |

### 2.2.2.2. Citric acid

Chemical denomination is Citric acid.

|        |   |
|--------|---|
| IUPAC: | 2-hydroxypropane-1,2,3-tricarboxylic acid |
| CAS:   | 77-92-9                                   |

EINECS/ELINCS: 201-069-1

### ***2.2.2.3. Tartaric acid***

Chemical denomination is Tartaric acid.

IUPAC: 2,3-dihydroxybutanedioic acid  
CAS: 87-39-4  
EINECS/ELINCS: 201-766-0

### ***2.2.2.4. Malic acid***

Chemical denomination is malic acid.

IUPAC: D-(+)-hydroxybutanedioic acid  
CAS: 6915-15-7  
EINECS/ELINCS: 230-022-8

### ***2.2.2.5. Malonic acid***

Chemical denomination is malonic acid.

IUPAC: propanedioic acid  
CAS: 141-82-2  
EINECS/ELINCS: 205-503-0

### ***2.2.2.6. Succinic acid***

Chemical denomination is Succinic acid.

IUPAC: Butanedioic acid  
CAS: 110-15-6  
EINECS/ELINCS: 203-740-4

### ***2.2.2.7. Lactic acid***

Chemical denomination is Lactic acid.

IUPAC: 2-Hydroxypropanoic acid  
CAS: 79-33-4  
EINECS/ELINCS: 201-296-2

### ***2.2.2.8. Propionic acid***

Chemical denomination is Propionic acid.

IUPAC: propanoic acid  
CAS: 90132-02-8  
EINECS/ELINCS: 290-419-7

### ***2.2.2.9. Glycerol***

Chemical denomination is glycerol.

IUPAC: propan-1,2,3-triol  
CAS: 56-81-9  
EINECS/ELINCS: 200-289-5

### ***2.2.2.10. Ethanol***

Chemical denomination is ethanol, ethyl-alcohol.

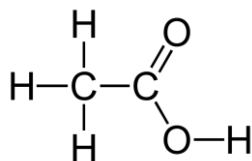
IUPAC: ethanol  
CAS: 64-17-5  
EINECS/ELINCS: 200-578-6

## 2.2.3. Molecular and structural formula, molecular mass

### 2.2.3.1. Acetic acid

Major chemical component after water is acetic acid.

Molecular formula:  $C_2H_4O_2$



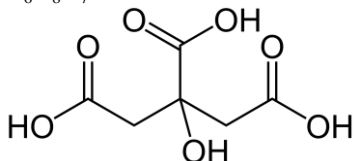
Structural formula:

Molecular mass: 60.05 [g/mol]

Minor chemical components after acetic acid are.

### 2.2.3.2. Citric acid

Molecular formula:  $C_6H_8O_7$

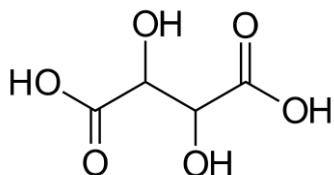


Structural formula:

Molecular mass: 192.124 (anhydrous); 210.14 (monohydrate) [g/mol]

### 2.2.3.3. Tartaric acid

Molecular formula:  $C_4H_6O_6$  (Basic formula);  $HO_2CCH(OH)CH(OH)CO_2H$  (Structural formula)

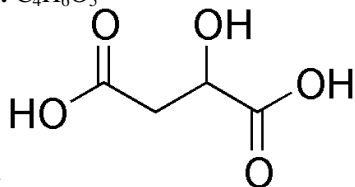


Structural formula:

Molecular mass: 150.09 [g/mol]

### 2.2.3.4. Malic acid

Molecular formula:  $C_4H_6O_5$



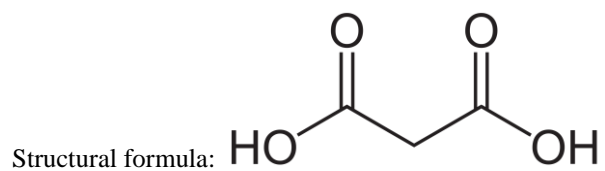
Structural formula:

Molecular mass: 134.09 [g/mol]

### 2.2.3.5. Malonic acid

Molecular formula:  $C_3H_4O_4$

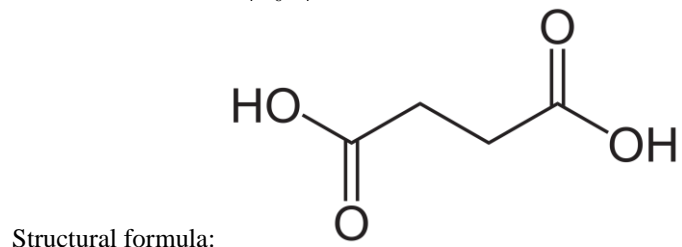




Molecular mass: 104.06 [g/mol]

### ***2.2.3.6. Succinic acid***

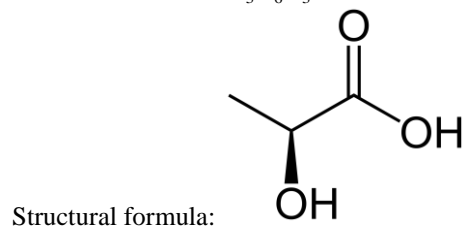
Molecular formula:  $C_4H_6O_4$



Molecular mass: 118.09 [g/mol]

### ***2.2.3.7. Lactic acid***

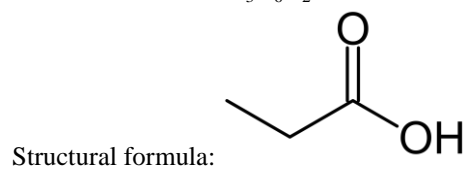
Molecular formula:  $C_3H_6O_3$



Molecular mass: 90.08 [g/mol]

### ***2.2.3.8. Propionic acid***

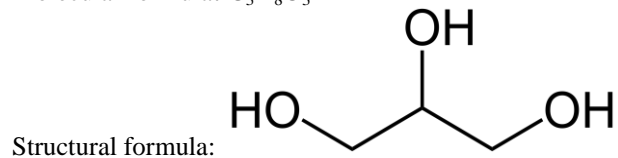
Molecular formula:  $C_3H_6O_2$



Molecular mass: 74.08 [g/mol]

### ***2.2.3.9. Glycerol***

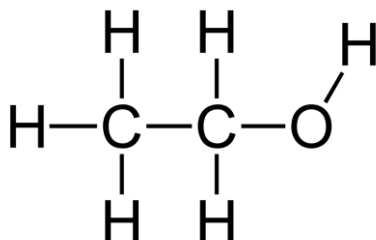
Molecular formula:  $C_3H_8O_3$



Molecular mass: 92.09 [g/mol]

#### **2.2.3.10. Ethanol**

Molecular formula: C<sub>2</sub>H<sub>6</sub>O



Structural formula:

Molecular mass: 46.07 [g/mol]

#### **2.2.4. Method or methods of manufacture of the substance and of the product**

Commercially available, not relevant, but overall consideration for vinegar specifications is included in:

**FAO WHO 1987 codex alimentarius commission, ALINORM 87/19 APPENDIX II DRAFT EUROPEAN REGIONAL STANDARD FOR VINEGAR p 34-38**

---

And following later proposed Draft

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

---

#### **2.2.5. Description and specification of purity of the active substance and product**

Commercially available, not relevant, but overall consideration for vinegar specifications is included in:

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

---

#### **2.2.6. Identity of inactive isomers, impurities and additives**

Not applicable, mainly constituted in acetic acid and water. Global consideration for vinegar impurities is included in:

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

---

#### **2.2.7. Methods of analysis**

Global consideration for vinegar analysis is included in:

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

---

### **2.2.7.1. Methods of analysis for determination of the active substance as manufactured**

**RESOLUTION OENO 52/2000 I. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ACIDITE TOTALE**

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

### **2.2.7.2. Analytical methods for determination of relevant impurities**

**RESOLUTION OENO 56/2000 V. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ALCOOL RESIDUEL**

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

### **2.2.7.3. Analytical methods for determination of residues**

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

## **2.3. CURRENT, FORMER AND IN CASE PROPOSED TRADE NAMES OF SUBSTANCES/ PRODUCTS AS PUT ON THE MARKET**

Vinegar

## **2.4. MANUFACTURER OF THE SUBSTANCE/PRODUCTS**

Not relevant, foodstuff commercially available all over the world.

## **2.5. TYPE OF PREPARATION OF THE SUBSTANCE/PRODUCT**

Solution for seed treatment (LS)

## **2.6. DESCRIPTION OF THE RECIPE FOR THE PRODUCT TO BE USED**

Formally, the formulation made of *VINEGAR* is commonly constituted of 5-8% acetic acid up to 20% in water. But, Vinegar is a common foodstuff, largely commercially available. Therefore, there is no recipe retained for this registration, only dilution is described here:

| <b>Mode of preparation :<br/>dilution in water</b>          | <b>% of vinegar<br/>in the preparation</b> | <b>Dilution<br/>vinegar/water<br/>L/L</b> | <b>Final volume<br/>L</b> | <b>Conc. of<br/>acetic acid<br/>(main a. s.)</b> |
|---|--|---|---------------------------|--|
| <b>“Distilled vinegar”<br/>VINEGAR at 5-10% acetic acid</b> | <b>50</b>                                  | <b>1/1</b>                                | <b>2</b>                  | <b>25-50g/L</b>                                  |

## 2.7. FUNCTION ON PLANT PROTECTION

Fungicide, bactericide.

# **3. USES OF THE SUBSTANCE AND ITS PRODUCT**

## 3.1. FIELD OF USE

The *VINEGAR* solution is intended to be used in fields for plant protection as fungicide/bactericide on wheat and barley seed together with vegetables seed (carrots, tomatoes ...).

**Doran WL 1928 ACETIC ACID AS A SOIL DISINFECTANT** *Journal of Agricultural Research*, Vol. 36, No. 3 Washington, D.C.

Basic considerations are reported concerning action of acetic acid, active ingredient of vinegar, as fungicide.

**Tobias A. 2010 Examination of materials and methods potential for organic seed treatment, Doctoral Theses**

During our experiments all concentrations of the selected vinegars inhibited the growth of the examined strains of bacteria, for which the pH value, which is the potential of hydrogen of the medium is responsible. For the pH sensitivity of bacteria these materials successfully inhibit their germination. These pathogens require the optimal pH value = 7.2 for their growth according to scientific literature, thus the medium made acid by vinegars is not suitable for their development.

Vinegars in 0.5% concentration inhibit reproduction and increasing concentration this effect can be multiplied. The inhibiting effect of vinegar in 10% concentration exceeds that of 50 ppm Streptomycin-sulfate.

The negative effect on germination ability of vinegars is in inverse ratio to concentration, however from 2.5% concentration they do not have negative effect on germination ability compared to the control, what is more, in the case of pepper germination ability was enhanced. White wine vinegar in very low condition (0.5%) stimulated mainly the germination ability and vigour of tomato seeds, while red wine vinegar had the same effect on the vigour of pepper seeds. On the basis of my experiments the antimicrobial effect of vinegar, cider vinegar, white and red wine vinegar can be established.

The above mentioned compounds in higher concentration have *cide* effect on bacteria, while stronger acids have the same effect on fungi, as well. Microbiological efficiency of vinegars is directly proportional to their concentration; however enhancing concentration might deplete germination ability of seeds.

**Tobias A. et al. 2008 Testing of different seed treatment materials on seed borne bacterial disease of tomato and pepper, First Symposium on Horticulture in Europe**

*In vitro* trials have shown that vinegar, cider vinegar, red wine vinegar and white wine vinegar have inhibiting effect against the causative agent of bacterial canker (*Clavibacter michiganensis subsp. michiganensis*), bacterial speck (*Pseudomonas syringae pv. tomato*) of tomato. These materials also have inhibiting impact on the causative agent of bacterial spot of pepper (*Xanthomonas campestris pv. vesicatoria*). The bacterial strains were more sensitive to acidic than alkaline circumstances. The lowest examined concentration (0.5 %) of vinegars had also bactericide impact.

**Tobias A. et al. 2008 Examinations of potential environmental friendly materials against tomato and pepper pathogens, International Journal of Horticultural Science, 14(4):49-54**

*In vitro* trials have shown that vinegar, eider vinegar, red wine vinegar, white wine vinegar, cinnamon and thyme oil have inhibiting effect against the causative agent of bacteria and fungi. Germination test has shown that examined vinegar types do not decrease germination ability if the concentration is low but in higher (more than 5%) concentration it ruins the germination ability. Even in 0.5% concentrations of red- and white wine vinegar have good effect on germination capacity.

**Tobias A. et al. 2007a Testing of suitable materials for ecological seed treatment, International Ph.D. Students' Conference. University of South Bohemia in České Budějovice, Faculty of Agriculture, 17th, April, České Budějovice, Czech Republic, Proceeding ISBN: 978-80-7040-972-5**

---

**Tobias A. et al. 2007b In vitro examination of the inhibition effect of different materials on seed borne bacterial disease of tomato and pepper, 15th International Congress on the Hungarian Society for Microbiology 18-20 July, Budapest Hungary (poszter), Acta Microbiologica et Immunologica Hungarica, Supplement 54, p.133-134**

---

General consideration are discussed in

**Marchand P, Coulombel A. 2012 Fiches Série Scienc'ITAB: Le Vinaigre, Activité antifongique, AlterAgri 116, p30-31**

---

**Bruyere J. 2013 Utilisation de l'acide acétique (*vinaigre*) dans la lutte contre la carie du blé (*Tilletia caries et foetida*) Journées Substances Naturelles en Protection des Cultures Réglementation, expérimentation, usages 9 & 10 avril 2013**

---

Vinegar at 1L per quintal of seed was clearly determined to be the best dose for wheat.

On common blight with a different technique, but with vinegar:

**Sholberg, PL; Gaudet, DA; Puchalski, B; Randall, P (2006) Control of common bunt (*Tilletia tritici* and *T. laevis*) of wheat (*Triticum aestivum* cv. 'Laura') by fumigation with acetic acid vapour. Canadian Journal of Plant Science, 86(3), 839-843**

---

**Vinegar is intended to control bacteria**

**Tobias A. et al. 2007 Effect of different treatments to bacterial canker (*Clavibacter michiganensis* subsp. *michiganensis*), bacterial speck (*Pseudomonas syringae* pv. *tomato*) in tomato and bacterial spot (*Xanthomonas campestris* pv. *vesicatoria*) in pepper International Journal of Horticultural Science, 13 (2): 49–53**

---

Vinegar has effect on bacteria on tomato and pepper seed as seed treatments.

### **3.2. EFFECTS ON HARMFUL ORGANISMS OR ON PLANTS**

**The VINEGAR solution is intended to limit seeds fungi aggression according to experimental studies.**

**ITAB 2012 Agir rapidement pour contenir la carie commune CONTROLER LA CARIE COMMUNE actes chapitre Traitements de semences : contrôler la carie p33**

---

The application on seed Tillecur, biological fortifying flour of mustard, and the application of acetic acid (vinegar) lead to a protection similar to that of official organic farming reference Cerall (difference not significant to the analysis of the combination test).

**Tobias A. 2011 Organic seed treatment possibilities, ISOFAR Conference programme, Organic is life – knowledge for tomorrow, 3rd Scientific Conference of ISOFAR 2011 Proceedings pp511-513.**

---

In vitro trials have shown that vinegar, eider vinegar, red wine vinegar, white wine vinegar, cinnamon and thyme oil have inhibiting effect against causative agent of bacteria and fungi. In all examined materials 10% vinegar caused the highest inhibition.

Strategies including use of vinegar are described)

**Borgen A. and Bent N. 2001 Effect of seed treatment with acetic acid for control of seed borne diseases. Proceedings from BCPC, Symposium No. 76: "Seed Treatment: Challenges & Opportunities", eds. A. J. Biddle. BCPC, Farnham, 135-140**

Experiments with vinegar as dressing have been carried out in organic farming and have proven to be effective against common bunt (*Tilletia tritici*) and leaf stripe (*Pyrenophora graminea*).

**Borgen A. & Kristensen L. 2000. Seed borne diseases – a challenge for organic cereal production. In Proceedings of the 13th IFOAM Scientific Conference, Basel 2000**

Vinegar was found to be active on Barley leaf stripe

**Lizot JF. et al. 2002 Désinfection des semences : des produits naturels pour la bio, Alter Agri N° 53 mai/juin p20-21**

Concentration of 10% vinegar was chosen because we observed a slowdown in growth of seedlings from 20%. This second screening showed the effectiveness of broad-spectrum fungicide vinegar, alone or in combination. Disinfection by products containing vinegar decreases statistically heavy contamination and the general level of contamination.

**Saidi B. et al. 2001 Effect of seed treatment with organic acids on the control of common bunt (*Tilletia tritici* and *T. laevis*) in wheat Meded Rijksuniv Gent Fak Landbouwk Toegep Biol Wet. 66(2a), pp213-21**

Using commercial acetic acid and lactic acid, the pathogen was successfully controlled, but the treatment negatively affected seed germination and seedling vitality. Using dilutions of acetic acid and lactic acid, significant control of the pathogen also was achieved with acetic acid without causing phytotoxicity. Dilutions of lactic acid also gave good control, but showed some phytotoxicity. Using 30-50 ml/kg of vinegar, which is a natural source of acetic acid, proved to be one of the most effective alternatives for control of common bunt on wheat. The treatment had no negative effects on seed germination nor on seedling vitality.

Results in 2011 and 2012 on wheat gave some interesting efficacy profile of vinegar: N dose is 1 litre (L) per qt of seeds, N/2 = 0.5 L; 2N = 2 L

| Situation                            | Product Dose                    | VIN dose N<br>2012 | VIN N/2<br>2012 | VIN 2N<br>2011 | Control |
|--------------------------------------|---------------------------------|--------------------|-----------------|----------------|---------|
| Contaminated Seeds /<br>Healthy Soil | <b>% Efficacy /<br/>Control</b> | 78                 | 50              | 81,7           | -       |

| Situation                            | Product Dose                    | VIN dose N<br>2012 | VIN N/2<br>2012 | VIN 2N<br>2011 | Control |
|--------------------------------------|---------------------------------|--------------------|-----------------|----------------|---------|
| Healthy Seeds /<br>Contaminated Soil | <b>% Efficacy /<br/>Control</b> | 67                 | 45              | 67,5           | -       |

For the year 2012, as a percentage of bunted heads, the results are, to get an idea of the level of contamination for this campaign:

| Situation                            | Product Dose                  | VIN N<br>2012 | VIN N/2<br>2012 | Control |
|--------------------------------------|-------------------------------|---------------|-----------------|---------|
| Contaminated Seeds /<br>Healthy Soil | <b>Average bunted heads %</b> | 12.25         | 28.25           | 56.5    |

|                                      |                               |      |    |       |
|--------------------------------------|-------------------------------|------|----|-------|
| Healthy Seeds /<br>Contaminated Soil | <b>Average bunted heads %</b> | 7.75 | 13 | 23.75 |
|--------------------------------------|-------------------------------|------|----|-------|

**Bruyere J. 2013 Utilisation de l'acide acétique (*vinaigre*) dans la lutte contre la carie du blé (*Tilletia caries et foetida*) Journées Substances Naturelles en Protection des Cultures Réglementation, expérimentation, usages 9 & 10 avril 2013**

---

Vinegar at 1L per quintal of seed was clearly determined to reduce presence of common bunt in wheat.

---

**Vinegar is intended to control bacteria**

**Tobias A. et al. 2007 Effect of different treatments to bacterial canker (*Clavibacter michiganensis* subsp. *michiganensis*), bacterial speck (*Pseudomonas syringae* pv. *tomato*) in tomato and bacterial spot (*Xanthomonas campestris* pv. *vesicatoria*) in pepper International Journal of Horticultural Science, 13 (2): 49–53**

---

Vinegar has effect on bacteria on tomato and pepper seed as seed treatments. The Mode of action is not clearly determined.

**van der Wolf, J.M., Bimbaum, Y., van der Zouwen, P.S. and Groot, S.P.C. 2008 Disinfection of vegetable seed by treatment with essential oils, organic acids and plant extracts *Seed Sci. & Technol.*, 36, 76-88**

---

The organic acids acetic acid, propionic acid, ascorbic acid and lactic acid showed a high antibacterial effect in the seed treatments, although in most experiments relatively high concentrations ( $\geq 2\%$ ) were required. The antimicrobial mechanism is not fully understood and the activity is dependent on the physiological status of the pathogen and the physicochemical properties of the environment (Ricke, 2003).

---

### **Conclusion §3**

Use of vinegar as fungicide is fully described, mode of action is not described, but since propionic acid, lactic acid or diluted hydrochloric acid are described for the same purpose, acidic properties (low pH) are clearly involved in fungicide action.

Use of vinegar as bactericide is fully described, mode of action is explored in\*:

**Reynolds A. E. 1974 The Mode of Action of Acetic Acid on Bacteria, University Microfilms, 230 pages**

---

\* Oldness of the dissertation and excessive price of the reprint discourage us to order the reference.

**Ricke S.C. 2003 Perspectives on the Use of Organic Acids and Short Chain Fatty Acids as Antimicrobials *Poultry Science* 82, p632–639**

---

Although the antibacterial mechanism(s) for organic acids are not fully understood, they are capable of exhibiting bacteriostatic and bactericidal properties depending on the physiological status of the organism and the physicochemical characteristics of the external environment. Given the weak acid nature of most of these compounds, pH is considered a primary determinant of effectiveness because it affects the concentration of undissociated acid formed (Davidson, 2001). It has been traditionally assumed that undissociated forms of organic acids can easily penetrate the lipid membrane of the bacterial cell and once internalized into the neutral pH of the cell cytoplasm dissociate into anions and protons (Eklund, 1983, 1985; Salmond et al., 1984; Cherrington et al., 1990, 1991; Davidson, 2001).

### 3.3. SUMMARY OF INTENDED USES

#### 3.3.1. As fungicide

| Crop and/or situation (a)   | Member State for use | Example product name as available on the market | F G I (b) | Target (c)  | Product**                        |                       | Application                       |                               |                    | Application rate per treatment      |  |   | PHI (days) (m) | Remarks (*)                         |                              |  |                               |  |
|---|----------------------|---|-----------|---|----------------------------------|-----------------------|-----------------------------------|-------------------------------|--------------------|-------------------------------------|--|---|----------------|-------------------------------------|------------------------------|--|-------------------------------|--|
|   |                      |   |           |   | Type (d-f)                       | Conc of a.i. g/kg (i) | Method kind (f-h)                 | Growth stage and season** (j) | Number min max (k) | Interval between applications (min) | g a.i./hl min max (g/hl)                                 | Water l/ha min max  |                |                                     | g a.i./ha min max (g/ha) (l) |  |                               |  |
| Wheat seeds<br><i>Triticum vulgare</i><br>Blé tendre<br><i>Triticum aestivum</i><br>Durum wheat<br><i>Triticum durum</i><br>Spelt<br><i>Triticum spelta</i> | France               | Vinegar   | F         | fungi like<br>Common bunt:<br><i>Tilletia caries</i><br><i>Tilletia foetida</i> | Liquid for Seed Treatment (LS) £ | 25-40*                | Seed application before seedling* | Autumn                        | 1                  | None                                | 25-40* per 100 kg of Seed** (2 litre of the preparation) | 2L of the preparation <sup>‡</sup> added per 100 kg of Seed** | 24-80**        | None: Not applicable Seed treatment |                              |  |                               |  |
| Barley seeds<br><i>Hordeum vulgare</i>  |                      |   |           | fungi like<br>Barley leaf stripe<br><i>Pyrenophora graminea</i>                 |                                  |                       |                                   |                               |                    |                                     |  |   |                |                                     | Autumn to spring             | Seeds are temporary deep in the preparation then removed | None Preparation is used pure | Seeds are temporary deep in the preparation then removed |
| Market vegetables<br>Gardening like carrot<br><i>Daucus carota</i><br>tomato<br><i>Solanum lycopersicum</i><br>bell pepper<br><i>Capsicum spp</i>           |                      |   |           | fungi like<br><i>Alternaria: Alternaria spp</i>                                 |                                  |                       |                                   |                               |                    |                                     |  |   |                |                                     |                              |  |                               |  |

\* Of active substance acetic acid. \*\* Seed treatment, just before sowing. £ Preparation is describe in the recipe §2.6. ‡ Considering 0.9 to 2 qt of seeds per ha.

- \* For uses where the column „Remarks. As above or other conditions to take into account
- (a) For crops, the EU and Codex classification (both) should be taken into account ; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), greenhouse application (G) or indoor application (I)
- (c) e.g. pests as biting and suckling insects, soil born insects, foliar fungi, weeds or plant elicitor
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR) etc..
- (e) GCPF Codes – GIFAP Technical Monograph N° 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant,
- (i) g/kg or g/L. Normally the rate should be given for the active substance (according to ISO)
- (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
- (k) Indicate the minimum and maximum number of application possible under practical conditions of use
- (l) The values should be given in g or kg whatever gives the more manageable number (e.g. 200 kg/ha instead of 200 000 g/ha or 12.5 g/ha instead of 0.0125 kg/ha)
- (m) PHI - minimum pre-harvest interval between the plant – type of equipment used must be indicated



### 3.3.2. As bactericide

| Crop and/or situation (a)   | Member State for use | Example product name as available on the market | F G I (b) | Target (c)  | Product**                        |                       | Application                       |                               |                    |                                     | Application rate per treatment                           |                               |  | PHI (days) (m)                      | Remarks (*) |
|---|----------------------|---|-----------|---|----------------------------------|-----------------------|-----------------------------------|-------------------------------|--------------------|-------------------------------------|--|-------------------------------|--|-------------------------------------|-------------|
|   |                      |   |           |   | Type (d-f)                       | Conc of a.i. g/kg (i) | Method kind (f-h)                 | Growth stage and season** (j) | Number min max (k) | Interval between applications (min) | g a.i./hl min max (g/hl)                                 | Water l/ha min max            | g a.i./ha min max (g/ha) (l)                             |                                     |             |
| Market vegetables gardening like tomato<br><i>Solanum lycopersicum</i><br>bell pepper<br><i>Capsicum spp</i><br>Cabbage<br><i>Brassica oleracea</i> | France               | Vinegar   | F G       | <i>Clavibacter Michiganensis</i><br><i>Clavibacter Michiganensis</i> subsp. <i>michiganensis</i><br><i>Pseudomonas syringae</i> pv. <i>Tomato</i><br><i>Xanthomonas campestris</i> pv. <i>Vesicatoria</i><br><i>Botrytis aclada</i> | Liquid for Seed Treatment (LS) £ | 25-40*                | Seed application before seedling* | Autumn to spring              | 1                  | None                                | Seeds are temporary deep in the preparation then removed | None Preparation is used pure | Seeds are temporary deep in the preparation then removed | None: Not applicable Seed treatment |             |

\* Of active compound acetic acid

\*\* Seed treatment, just before sowing.

£ Preparation is describe in the recipe §2.6.

- \* For uses where the column „Remarks. As above or other conditions to take into account
- (a) For crops, the EU and Codex classification (both) should be taken into account ; where relevant, the use situation should be described (e.g. fumigation of a structure)
- (b) Outdoor or field use (F), greenhouse application (G) or indoor application (I)
- (c) e.g. pests as biting and suckling insects, soil born insects, foliar fungi, weeds or plant elicitor
- (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR) etc..
- (e) GCPF Codes – GIFAP Technical Monograph N° 2, 1989
- (f) All abbreviations used must be explained
- (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
- (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant,
- (i) g/kg or g/L. Normally the rate should be given for the active substance (according to ISO)
- (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
- (k) Indicate the minimum and maximum number of application possible under practical conditions of use
- (l) The values should be given in g or kg whatever gives the more manageable number (e.g. 200 kg/ha instead of 200 000 g/ha or 12.5 g/ha instead of 0.0125 kg/ha)
- (m) PHI - minimum pre-harvest interval between the plant – type of equipment used must be indicated

## **4. CLASSIFICATION AND LABELLING OF THE SUBSTANCE**

Not applicable: *VINEGAR* is a food product.  
No comment on ECHA following pre-registration (30/11/2010).

## **5. IMPACT ON HUMAN AND ANIMAL HEALTH**

### **5.1. EFFECTS HAVING RELEVANCE TO HUMAN AND ANIMAL HEALTH ARISING FROM EXPOSURE TO THE SUBSTANCE/ITS PRODUCTS OR TO IMPURITIES CONTAINED IN THE SUBSTANCE/PRODUCT OR THEIR TRANSFORMATION PRODUCTS**

The application indicates the DAR of acetic acid (2008) to address all toxicological endpoints. EFSA prepared a conclusion on acetic acid in 2013 (EFSA Journal 2013;11(1):3060): no data gaps or concerns were highlighted for the mammalian toxicology, apart for the potential of skin corrosion (but only for concentration >90%). It was concluded that no reference values need to be set for consumer exposure, however the critical effects of acetic acid for operators/workers/bystanders are related to its irritating properties by inhalation, triggering by neurobehavioral signs and changes in red blood cells at 15 mg/m<sup>3</sup> in a valid human volunteer study. Based on a NOAEC of 10 mg/m<sup>3</sup>, and with the application of an uncertainty factor of 10 for intra-species variability, the Acceptable Operator Exposure Concentration (AOEC) is 1 mg/m<sup>3</sup>.

Considering the inhalation toxicity effects of acetic acid in humans, vinegar could be considered as a substance of concern. However, under the proposed conditions of use (seed treatment) it is considered unlikely that the relevant effects via inhalation could realistically occur. It is noted that the key component of vinegar (acetic acid) is approved as a plant protection product.

**EFSA 2013 conclusion on acetic acid, EFSA Journal 2013;11(1):3060**

### **5.2. TOXICOKINETICS AND METABOLISM IN HUMANS**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

### **5.3. ACUTE TOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

### **5.4. SHORT-TERM TOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

### **5.5. GENOTOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **5.6. LONG-TERM TOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **5.7. REPRODUCTIVE TOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **5.8. NEUROTOXICITY**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **5.9. TOXICITY STUDIES ON METABOLITES**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **5.10. MEDICAL DATA: ADVERSE EFFECTS REPORTED IN HUMANS**

No report is described, in general use of vinegar as food.

## **5.11. ADDITIONAL INFORMATION RELATED TO THERAPEUTIC PROPERTIES OR HEALTH CLAIMS**

Not applicable: *VINEGAR* is a food product.

## **5.12. ADDITIONAL INFORMATION RELATED TO USE AS FOOD**

*VINEGAR* is available all over the world as consumption product for cooking, preservative action...

## **5.13. ACCEPTABLE DAILY INTAKE, ACUTE REFERENCE DOSE, ACCEPTABLE OPERATOR EXPOSURE LEVEL**

**D'Mello J. P. Felix 2003 Food safety contaminants and toxins, CABI publishing p 248**

Acetic acid (*vinegar*) is also employed in preparing salad dressings, sauce, mayonnaise, pickles, ketchups, syrups and cheese. *ADI*: not limited.

**FAO WHO 1974 Food additives series n°5 Toxicological evaluation of some food additives including anticaking agents, antimicrobials, antioxidants, emulsifiers and thickening agents, ACETIC ACID AND ITS POTASSIUM AND SODIUM SALTS**

*ADI*: not limited.

## **5.14. IMPACT ON HUMAN AND ANIMAL HEALTH ARISING FROM EXPOSURE TO THE ACTIVE SUBSTANCE OR IMPURITIES CONTAINED IN IT**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

---

### **Conclusion §5**

Safety of vinegar is proven with centuries of use and no ADI limit.

## **6. RESIDUES**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

Although, vinegar is commercially available foodstuff, possible residues determination are available.

**RESOLUTION OENO 56/2000 V. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ALCOOL RESIDUEL**

---

## **7. FATE AND BEHAVIOUR IN THE ENVIRONMENT**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **8. EFFECTS ON NON-TARGET SPECIES**

### **8.1. GENERAL CONSIDERATION:**

**EFSA 2013 conclusion on acetic acid, EFSA Journal 2013;11(1):3060**

---

**EU 2013 COMMISSION IMPLEMENTING REGULATION (EU) No 790/2013 of 19 August 2013 amending Implementing Regulation (EU) No 540/2011 as regards the conditions of approval of the active substance acetic acid**

---

#### **8.1.1. succinic acid**

All characteristics are detailed in:

**Dupont, 2001, ROBUST SUMMARY FOR DICARBOXYLIC ACID CATEGORY, 201-13108, pp84-95**

---

#### **8.1.2. lactic acid**

All characteristics are detailed in:

**USEPA, 2009, BIOPESTICIDES REGISTRATION ACTION DOCUMENT L-Lactic Acid Office of Pesticide Programs, Biopesticides and Pollution Prevention Division, June 2009 U.S. Environmental Protection Agency, pp 1-22**

---

### **8.1.3. propionic acid**

All characteristics are detailed in:

**USEPA, 1991, United States Pesticides And Environmental Protection Toxic Substances, Agency (7508W) 738-F-91-106, R.E.D. FACTS Propionic Acid**

---

and

**USEPA, 1991, REREGISTRATION ELIGIBILITY DOCUMENT, PROPIONIC ACID, AND SALTS, LIST D, CASE 4078, SEPTEMBER 1991**

---

### **8.1.4. glycerol**

All characteristics are detailed in:

**OECD SIDS 2002 GLYCEROL UNEP PUBLICATIONS SIDS Initial Assessment Report For SIAM 14 Paris, France**

---

## **8.2. EFFECTS ON TERRESTRIAL VERTEBRATES**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

### **8.2.1. Acetic acid**

Oral: LD50 rat: 3.310 mg/kg  
Inhalation: LC50 rat: 40 mg/l  
Exposure: 4 h

**MSDS 2013 NATURAL CLEANER VINEGAR 1L Version 5.0 Date de révision 18.09.2013**

---

## **8.3. EFFECTS ON AQUATIC ORGANISMS**

Vinegar is used in aquarium.

**Babcock C. Holmes Farley R. 2012 Vinegar Dosing Methodology for the Marine Aquarium, Tank of the month vol 10 (6) <http://reefkeeping.com/joomla/index.php/current-issue/article/116-vinegar-dosing-methodology-for-the-marine-aquarium>**

---

### **8.3.1. Acetic acid**

LC50 (*Lepomis macrochirus* (Crapet arlequin)): 75 mg/l  
Exposure: 96 h  
LC50 (*Leuciscus idus*(Ide)): 410 mg/l  
Exposure: 48 h

LC50 (*Oncorhynchus mykiss* (Trout, Truite arc-en-ciel)): > 300,82 mg/l

Exposure: 96 h

Method: OCDE 203

EC50 (*Daphnia magna*): > 300,82 mg/l

Exposure: 48 h

Method: OCDE 202

EC50 (*Daphnia magna*): 47 - 95 mg/l

Exposure: 24 h

**MSDS 2013 NATURAL CLEANER VINEGAR 1L Version 5.0 Date de révision 18.09.2013**

---

## **8.4. EFFECTS ON BEES AND OTHER ARTHROPODS SPECIES**

### **8.4.1. Bees**

As seed treatment, contact with bees should not occur.

Vinegar (up to 10 %) show little or no repellency (score mean rating 0.1).

**Woodrow A.W. et al. 1965 Bees attractant and repellent *J. Econ. Entomol.* 58(6), pp 1094-1102**

---

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414) and later.

**EU 2013 COMMISSION IMPLEMENTING REGULATION (EU) No 790/2013 of 19 August 2013 amending Implementing Regulation (EU) No 540/2011 as regards the conditions of approval of the active substance acetic acid**

---

### **8.4.2. Other athropods**

No data found.

## **8.5. EFFECTS ON EARTHWORMS AND OTHER SOIL MACRO-ORGANISMS**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **8.6. EFFECTS ON SOIL MICRO-ORGANISMS**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

### **8.6.1. Acetic acid**

Toxicity on bacteria : EC10 (*Pseudomonas putida*): 1.000 mg/l

Exposure: 30 min

## **8.7. EFFECTS ON OTHER NON-TARGET ORGANISMS (FLORA AND FAUNA)**

As seed treatment, contact with aerial part of flora is supposed to be low, although, in DAR acetic acid, herbicide effect is described. As matter of fact, since this BSA vinegar is supported by Organic, Farming institute, no herbicide effect is pursue.

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

## **8.8. EFFECTS ON BIOLOGICAL METHODS OF SEWAGE TREATMENT**

Regarding data for this §point, all details can be found in Draft Assessment Report of Acetic Acid 2008 (Fourth Stage Review Program of Council Directive 91/414).

For more details:

**NSW Department of Local Government. 2000. The Easy Septic Guide. Developed by Social Change Media for the New South Wales Department of Local Government.**

---

### **Conclusion §8**

At 80 equivalent g/ha (MAX) of acetic acid (a.s.) once per year, directly on the seeds, environmental safety of vinegar used as seed treatment is obvious.

## **9. OVERALL CONCLUSIONS WITH RESPECT OF ELIGIBILITY OF THE SUBSTANCE TO BE APPROVED AS BASIC SUBSTANCE**

Describe in synthesis fulfilment of criteria

(a) is not a substance of concern; and

(b) does not have an inherent capacity to cause endocrine disrupting, neurotoxic or immunotoxic effects; and

(c) is not predominantly used for plant protection purposes but nevertheless is useful in plant protection either directly or in a product consisting of the substance and a simple diluent; and

(d) is not placed on the market as a plant protection product.

*VINEGAR* is a food compound which can be fully characterized according Council Regulation 2002/178 fully described in FAO codex.

**FAO WHO 2000 codex alimentarius commission, CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5**

---

*VINEGAR* has an extremely low toxicological profile, especially for the proposed use.

*VINEGAR* is consumed as food all over the world,

Therefore it is not considered as a substance of concern.

*VINEGAR* is not predominantly used for plant protection purposes but is used as a fungicide in plant protection, as a solution.

*VINEGAR*, as a plant is not placed on the market as a plant protection product. *VINEGAR* is commonly consumed all over the world as food sweetener, cooked food, and bakery.

*VINEGAR* fulfils the criteria of a 'foodstuff' as defined in Article 2 of Regulation (EC) N° 178/2002; therefore it shall be considered as a basic substance.

## **ANNEX I LIST REFERENCES RELIED ON**

Include here all references studies and assessment reports cited in the various chapter of application model.

| <b>Author(s)</b>                             | <b>Year</b> | <b>Title<br/>Source<br/>Company, report N°<br/>GLP or GEP status<br/>Published or not</b>                              |
|--|-------------|--|
| <b>SECTION 1: Purpose of the application</b> |             |  |
| EC   | 2008        | Title: Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br>Source: EC |

| <b>Author(s)</b>  | <b>Year</b> | <b>Title<br/>Source<br/>Company, report N°<br/>GLP or GEP status<br/>Published or not</b>  |
|---|-------------|--|
| <b>SECTION 2: Classification and labelling</b>  |             |  |
| EC  | 2008        | Title: Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br>Source: EC   |
| Aguiar A.<br>de Alencar<br>Nascimento R.A.<br>Ferretti L.P.<br>Gonçalves A.R.                 | 2005        | Title: Determination of Organic Acids and Ethanol in Commercial Vinegars<br>Source: <i>Braz. J. Food Technol.</i> , 5° SIPAL   |
| AKPINAR-<br>BAYIZIT Arzu,<br>TURAN Murat<br>Ali,<br>YILMAZ-<br>ERSAN Lutfiye,<br>TABAN Nilgun | 2010        | Title: Inductively Coupled Plasma Optical-Emission Spectroscopy Determination of Major and Minor Elements in Vinegar<br>Source: <i>Notulae Botanicae Horti Agrobotanici Cluj-Napoca</i> , 38 (3), 64-68        |
| Nickol<br>GB  | 1979        | Title: Vinegar.<br>Source: Peppler HJ, Perlman D. Microbiology technology. 2 <sup>nd</sup> ed. New York: Academic Press. p 155-172.  |
| Pederson<br>CS  | 1979        | Title: Vinegar.<br>Source: Microbiology of food fermentation, 2 <sup>nd</sup> ed. Westport: AVI Publishing Co. p 52.   |
| EC  | 2006        | Title: Decision 2006/257/EC Commission Decision of 9 February 2006 amending Decision 96/335/EC establishing an inventory and a common nomenclature of ingredients employed in cosmetic products.<br>Source: EC |
| FAO<br>WHO  | 1987        | Title: ALINORM 87/19 APPENDIX II DRAFT EUROPEAN REGIONAL STANDARD FOR VINEGAR p 34-38<br>Source: codex alimentarius commission   |
| FAO<br>WHO  | 2000        | Title: CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5<br>Source: codex alimentarius commission  |
| OIV   | 2000        | Title: RESOLUTION OENO 52/2000, I. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ACIDITE TOTALE.<br>Source: OIV   |
| OIV   | 2000        | Title: RESOLUTION OENO 56/2000, V. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ALCOOL RESIDUEL.<br>Source: OIV  |



| Author(s)  | Year | Title<br>Source<br>Company, report N°<br>GLP or GEP status<br>Published or not  |
|--|------|---|
| <b>SECTION 3 : Uses of the substance and its product</b>       |      |   |
| EC   | 2008 | Title: Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br>Source: EC  |
| Doran W.L.   | 1928 | Title: ACETIC ACID AS A SOIL DISINFECTANT<br>Source: Journal of Agricultural Research, , Vol. 36, No. 3 Washington, D.C.  |
| Tobias A.  | 2010 | Title: Examination of materials and methods potential for organic seed treatment<br>Source: Doctoral Theses   |
| Tobias A.<br>et al.  | 2008 | Title: Testing of different seed treatment materials on seed borne bacterial disease of tomato and pepper<br>Source: First Symposium on Horticulture in Europe  |
| Tobias A.<br>et al.  | 2008 | Title: Examinations of potential environmental friendly materials against tomato and pepper pathogens<br>Source: <i>International Journal of Horticultural Science</i> , 14(4):49-54  |
| Tobias A.<br>et al.  | 2007 | Title: Testing of suitable materials for ecological seed treatment<br>Source: International Ph.D. Students` Conference. University of South Bohemia in České Budějovice, Faculty of Agriculture, 17th, April, České Budějovice, Czech Republic, Proceeding ISBN: 978-80-7040-972-5  |
| Tobias A.<br>et al.  | 2007 | Title: In vitro examination of the inhibition effect of different materials on seed borne bacterial disease of tomato and pepper<br>Source: 15th International Congress on the Hungarian Society for Microbiology 18-20 July, Budapest Hungary (poszter), <i>Acta Microbiologica et Immunologica Hungarica</i> , Supplement 54, p.133-134 |
| ITAB   | 2012 | Title: Agir rapidement pour contenir la carie commune, CONTROLER LA CARIE COMMUNE<br>Source: actes chapitre Traitements de semences : contrôler la carie p33  |
| Tobias A.  | 2011 | Title: Organic seed treatment possibilities<br>Source: ISOFAR Conference programme, Organic is life – knowledge for tomorrow, 3rd Scientific Conference of ISOFAR Proceedings pp511-513.  |
| Borgen A.  | -    | Title: A. Strategies for regulation of seed borne diseases in organic farming.<br>Source: <i>Agrologica</i> , <a href="http://www.agrologica.dk">www.agrologica.dk</a> , p 1  |
| Borgen A.<br>& Bent N.   | 2001 | Title: Effect of seed treatment with acetic acid for control of seed borne diseases.<br>Source: Proceedings from BCPC, Symposium No. 76: "Seed Treatment: Challenges & Opportunities", eds. A. J. Biddle. BCPC, Farnham, 135-140  |
| Borgen A.<br>Kristensen L.                                     | 2000 | Title: Seed borne diseases – a challenge for organic cereal production.<br>Source: In Proceedings of the 13th IFOAM Scientific Conference, Basel  |
| Lizot JF et<br>al.   | 2002 | Title: Désinfection des semences : des produits naturels pour la bio<br>Source: <i>Alter Agri</i> N° 53 mai/juin p20-21   |
| Saidi B.<br>et al.   | 2001 | Title: Effect of seed treatment with organic acids on the control of common bunt ( <i>Tilletia tritici</i> and <i>T. laevis</i> ) in wheat<br>Source: <i>Meded Rijksuniv Gent Fak Landbouwkde Toegep Biol Wet.</i> ; 66(2a):213-21  |
| Marchand P,<br>Coulombel<br>A.                                 | 2012 | Title: Fiches Série Scienc'ITAB: Le Vinaigre, Activité antifongique,<br>Source: <i>AlterAgri</i> 116, p30-31  |
| Bruyere J.   | 2013 | Title: Utilisation de l'acide acétique ( <i>vinaigre</i> ) dans la lutte contre la carie du blé ( <i>Tilletia caries</i> et <i>foetida</i> )<br>Source: Journées Substances Naturelles en Protection des Cultures Réglementation, expérimentation, 9 & 10 avril 2013  |
| Sholberg,<br>PL; Gaudet,<br>DA;<br>Puchalski, B;<br>Randall, P | 2006 | Title: Control of common bunt ( <i>Tilletia tritici</i> and <i>T.laevis</i> ) of wheat ( <i>Triticum aestivum</i> cv. 'Laura') by fumigation with acetic acid vapour.<br>Source: Canadian Journal of Plant Science, 86(3), 839-843.   |

| <b>Author(s)</b>  | <b>Year</b> | <b>Title</b><br><b>Source</b><br><b>Company, report N°</b><br><b>GLP or GEP status</b><br><b>Published or not</b>                    |
|---|-------------|--|
| <b>SECTION 4: Classification and labelling of the substance</b> |             |  |
| EC  | 2008        | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC |

| <b>Author(s)</b>                                     | <b>Year</b> | <b>Title</b><br><b>Source</b><br><b>Company, report N°</b><br><b>GLP or GEP status</b><br><b>Published or not</b>  |
|--|-------------|--|
| <b>SECTION 5 : Impact on human and animal health</b> |             |  |
| EFSA   | 2013        | <b>Title:</b> Conclusion on the peer review of the pesticide risk assessment of the active substance acetic acid,<br><b>Source:</b> EFSA Journal 2013;11(1):3060   |
| EC   | 2008        | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC   |
| D'Mello<br>J. P. Felix                               | 2003        | <b>Title:</b> Foo safety contaminants and toxins<br><b>Source:</b> CABI publishing p 248   |
| FAO<br>WHO   | 1974        | <b>Title:</b> Toxicological evaluation of some food additives including anticaking agents, antimicrobials, antioxidants, emulsifiers and thickening agents, ACETIC ACID AND ITS POTASSIUM AND SODIUM SALTS<br><b>Source:</b> Food additives series n°5 |

| <b>Author(s)</b>            | <b>Year</b> | <b>Title</b><br><b>Source</b><br><b>Company, report N°</b><br><b>GLP or GEP status</b><br><b>Published or not</b>                    |
|-----------------------------|-------------|--|
| <b>SECTION 6 : Residues</b> |             |  |
| EC                          | 2008        | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC |
| OIV                         | 2000        | <b>Title:</b> RESOLUTION OENO 56/2000, V. VINAIGRES DE VIN – DETERMINATION DE LA TENEUR EN ALCOOL RESIDUEL.<br><b>Source:</b> OIV    |

| <b>Author(s)</b>   | <b>Year</b> | <b>Title</b><br><b>Source</b><br><b>Company, report N°</b><br><b>GLP or GEP status</b><br><b>Published or not</b>                    |
|--|-------------|--|
| <b>SECTION 7 : Fate and Behaviour in the environment</b> |             |  |
| EC   | 2008        | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC |

| Author(s)  | Year | Title<br>Source<br>Company, report N°<br>GLP or GEP status<br>Published or not   |
|--|------|--|
| <b>SECTION 8 : Effects on non target species</b> |      |  |
| EFSA   | 2013 | <b>Title:</b> conclusion on acetic acid,<br><b>Source:</b> EFSA Journal 2013;11(1):3060  |
| Dupont   | 2001 | <b>Title:</b> ROBUST SUMMARY FOR DICARBOXYLIC ACID CATEGORY, 201-13108, pp84-95<br><b>Source:</b> ROBUST SUMMARY FOR DICARBOXYLIC ACID CATEGORY  |
| EC   | 2008 | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC   |
| EU   | 2013 | <b>Title:</b> COMMISSION IMPLEMENTING REGULATION (EU) No 790/2013 of 19 August 2013 amending Implementing Regulation (EU) No 540/2011 as regards the conditions of approval of the active substance acetic acid<br><b>Source:</b> UE   |
| Babcock<br>C.<br>Holmes<br>Farley R.             | 2012 | <b>Title:</b> Vinegar Dosing Methodology for the Marine Aquarium,<br><b>Source:</b> Tank of the month vol 10 (6) <a href="http://reefkeeping.com/joomla/index.php/current-issue/article/116-vinegar-dosing-methodology-for-the-marine-aquarium">http://reefkeeping.com/joomla/index.php/current-issue/article/116-vinegar-dosing-methodology-for-the-marine-aquarium</a> |
| NSW  | 2000 | <b>Title:</b> The Easy Septic Guide. Developed by Social Change Media for the New South Wales Department of Local Government.<br><b>Source:</b> Department of Local Government.  |
| USEPA  | 1991 | <b>Title:</b> United States Pesticides And Environmental Protection Toxic Substances, Agency (7508W) 738-F-91-106, R.E.D. FACTS Propionic Acid<br><b>Source:</b> USEPA   |
| USEPA  | 1991 | <b>Title:</b> REREGISTRATION ELIGIBILITY DOCUMENT, PROPIONIC ACID, AND SALTS, LIST D, CASE 4078, SEPTEMBER 1991<br><b>Source:</b> USEPA  |
| USEPA  | 2009 | <b>Title:</b> BIOPESTICIDES REGISTRATION ACTION DOCUMENT L-Lactic Acid Office of Pesticide Programs,<br><b>Source:</b> Biopesticides and Pollution Prevention Division, June 2009 U.S. Environmental Protection Agency, pp 1-22  |
| OECD<br>SIDS                                     | 2002 | <b>Title:</b> GLYCEROL<br><b>Source:</b> UNEP PUBLICATIONS SIDS Initial Assessment Report For SIAM 14 Paris, France  |
| MSDS   | 2013 | <b>Title:</b> NATURAL CLEANER VINEGAR 1L Version 5.0 Date de révision 18.09.2013<br><b>Source:</b> TanaProfessionals   |

| Author(s)   | Year | Title<br>Source<br>Company, report N°<br>GLP or GEP status<br>Published or not   |
|---|------|--|
| <b>SECTION 9 : Overall conclusions with respect of Eligibility of the substance to be approved as basic substance</b> |      |  |
| EC  | 2008 | <b>Title:</b> Draft Assessment Report of Acetic Acid (Fourth Stage Review Program of Council Directive 91/414).<br><b>Source:</b> EC             |
| FAO<br>WHO  | 2000 | <b>Title:</b> CL 2000/18-EURO, Proposed DRAFT revised REGIONAL STANDARD FOR VINEGAR p 1-5<br><b>Source:</b> <i>codex alimentarius</i> commission |