

# Preparing and submitting an application for *in situ* substances

ECHA Biocides Stakeholders' Day  
September 1, 2016

# TEAM

MANAGEMENT

Support for **individual or grouped companies** applying or for a family or individual biocidal products authorisation - EU or national



JSC

TECHNICAL  
EXPERTISE

Scientific experts delivering regulatory and testing strategy services, providing Chemical, Toxicological and Exotoxicological expertise

- Approval of active substances
- Authorisation of biocidal products

Strong, globally connected team focused on providing both local and global knowledge of market drivers and regulatory landscape

PRODUCT  
SUSTAINABILITY  
SERVICES

*This unique combination ERM-ReachCentrum-JSC provides a wealth of knowledge and experience covering a wide range of product types and regulatory procedures to support clients through the value chain*

# CONTENT

WHAT ARE  
*IN SITU*  
SUBSTANCES?

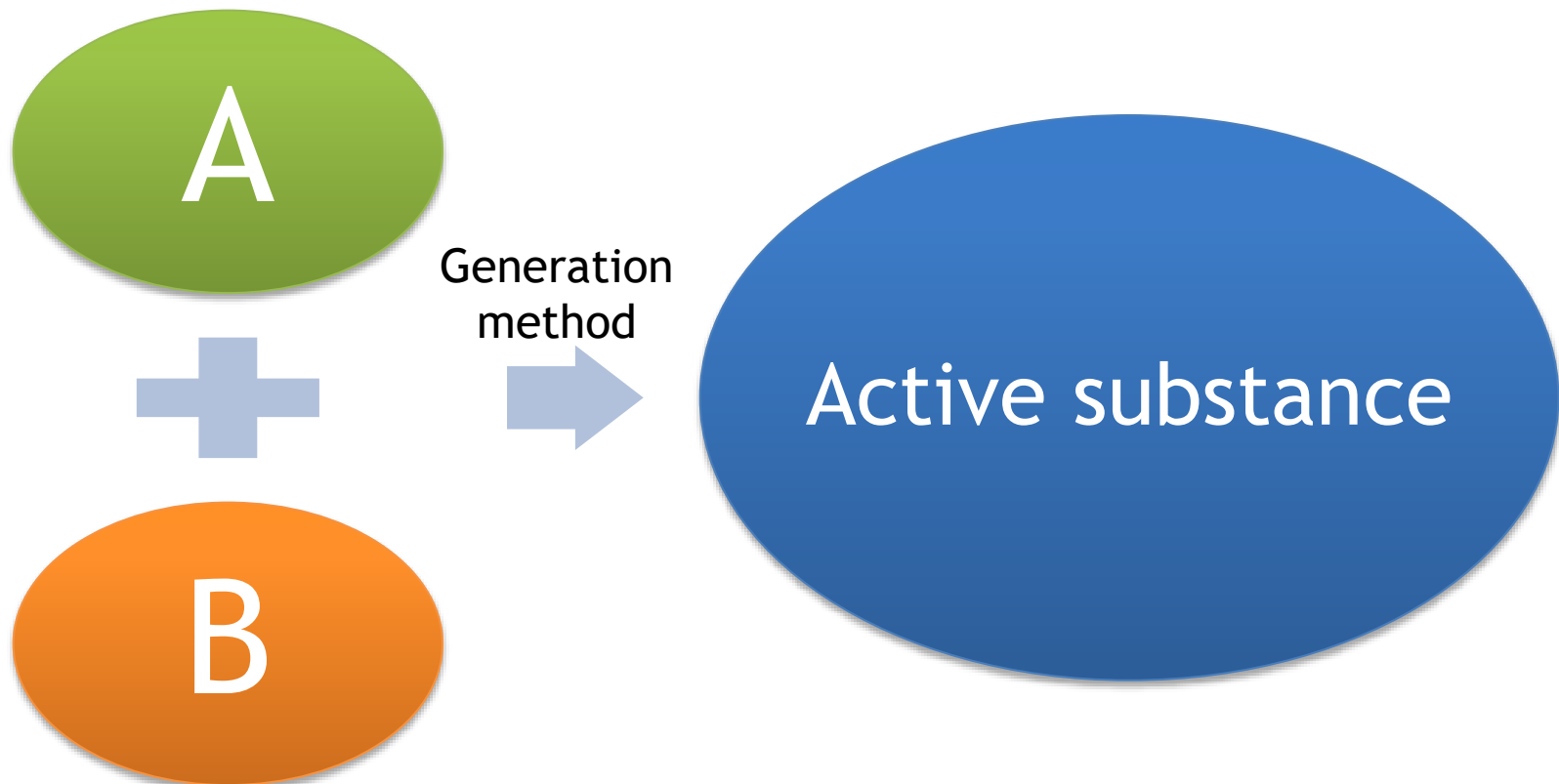
OBLIGATIONS

TECHNICAL  
REQUIREMENTS

DOSSIER  
SUBMISSION

# *IN SITU* SUBSTANCES

- Substances that are generated from one or more precursors at the place of use



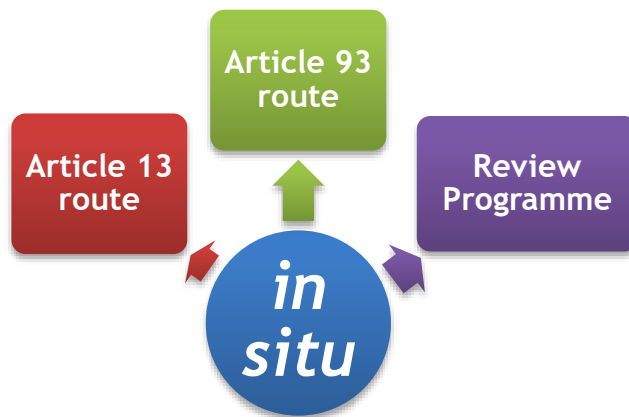
# ARTICLE 3((1)(A)) OF BPR 528/2012

The definition of biocidal product confirms that:

- The supply of a precursor with the intention to generate an *in situ* biocide
  - Biocides generated from ambient precursors that are not supplied
- ➔ Falls under the *in situ* generated substance

# *IN SITU* SUBSTANCE CONT.

- Agreement between MSCAs and the European Commission
- For all substances generated *in situ*, the active substance must be defined by reference to the precursor(s) supported in the dossier and to the substance generated



# DOSSIER PREPARATION

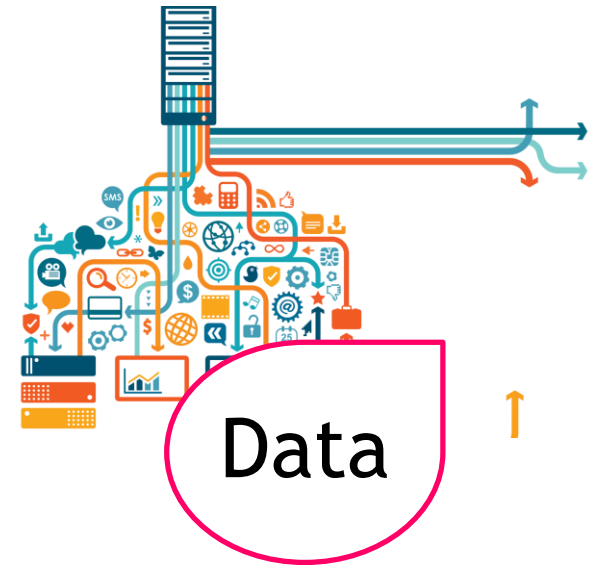
For *in situ* generated active substance, the dossier will need to cover data on both the *in situ* substance and the precursor(s), as well as other relevant substances in terms of generating the active



Dossier

# DATA ANALYSIS

Where the active substance is generated *in situ* then 5-batch analysis data on the precursors and the active substance itself is required





# DESCRIPTION OF THE METHOD OF APPLICATION

If an apparatus is used to produce the active substance *in situ* and to dose it directly, information should be provided on safety measures concerning over and under dosing



Method

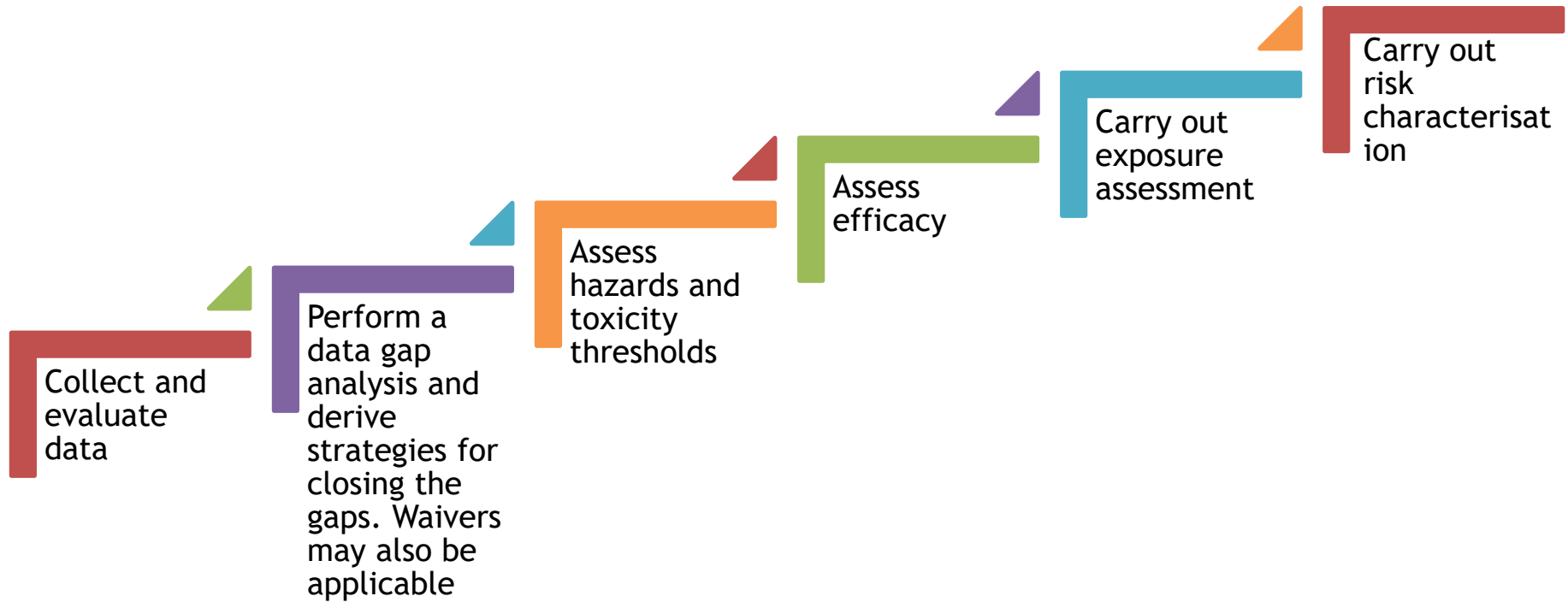
# RISK ASSESSMENT

For *in situ* generated active substance, the risk assessment includes also the possible risks from the precursor(s)

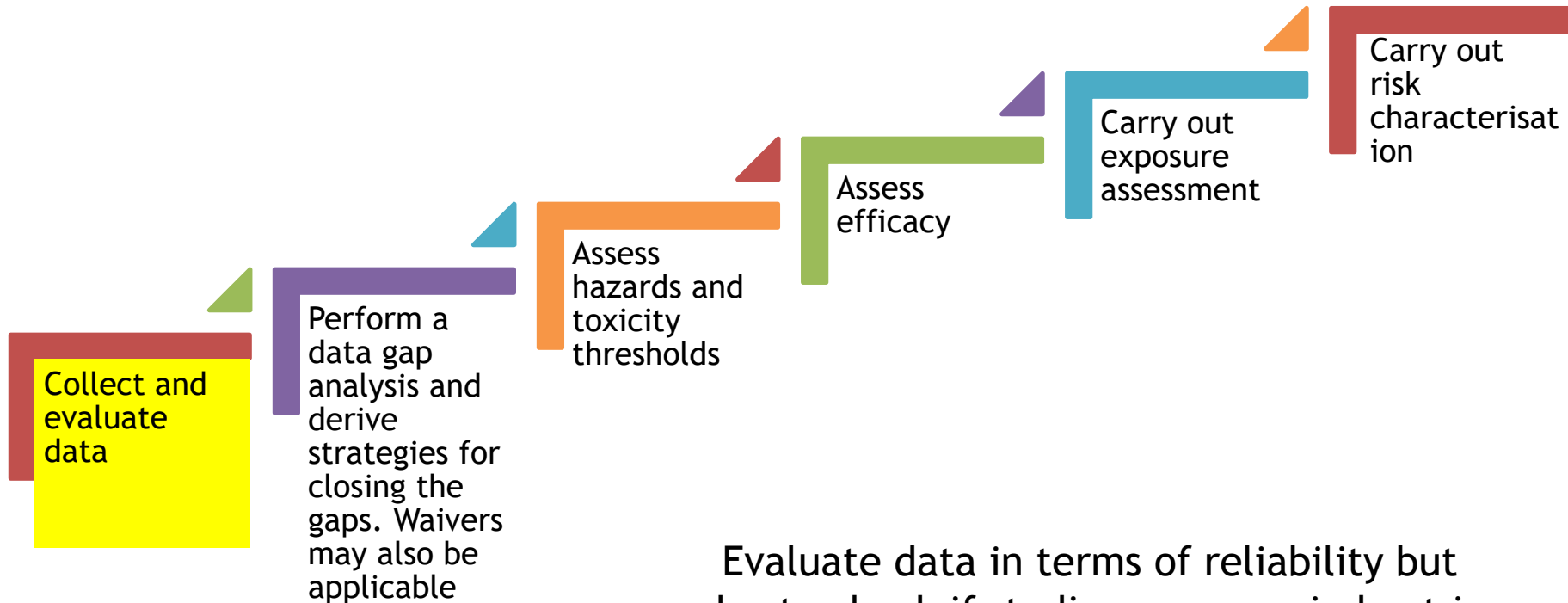


Risk  
Assessment

# TECHNICAL STEPS IN APPROVAL/AUTHORISATIONS PROCESSES

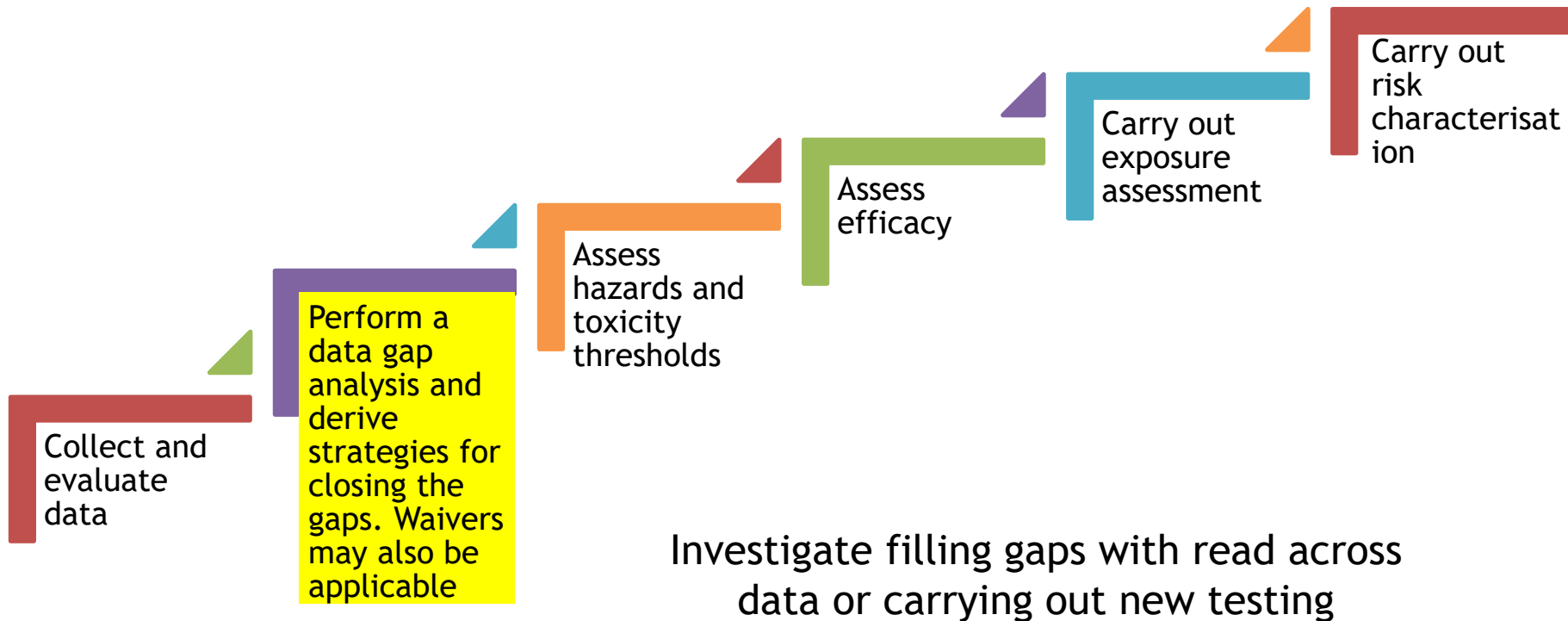


# COLLECT DATA

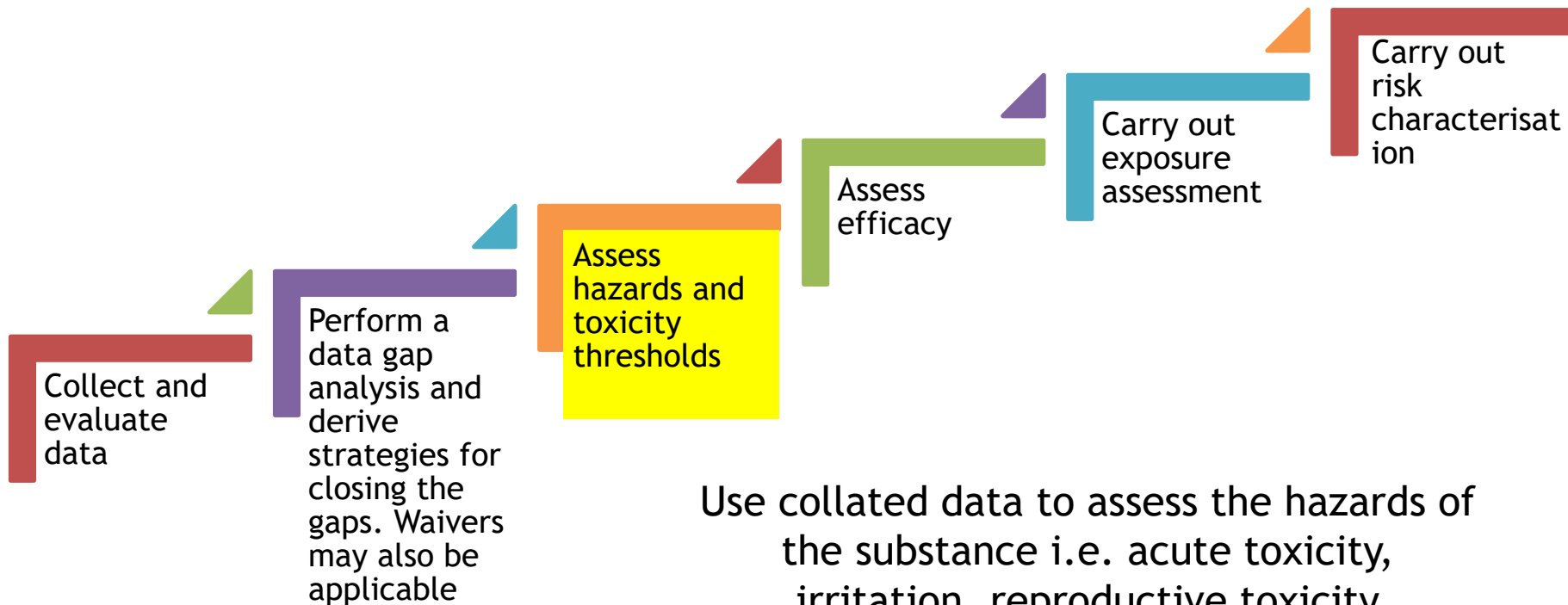


Evaluate data in terms of reliability but also to check if studies were carried out in accordance with approved protocols i.e. OECD

# DATA GAP ANALYSIS



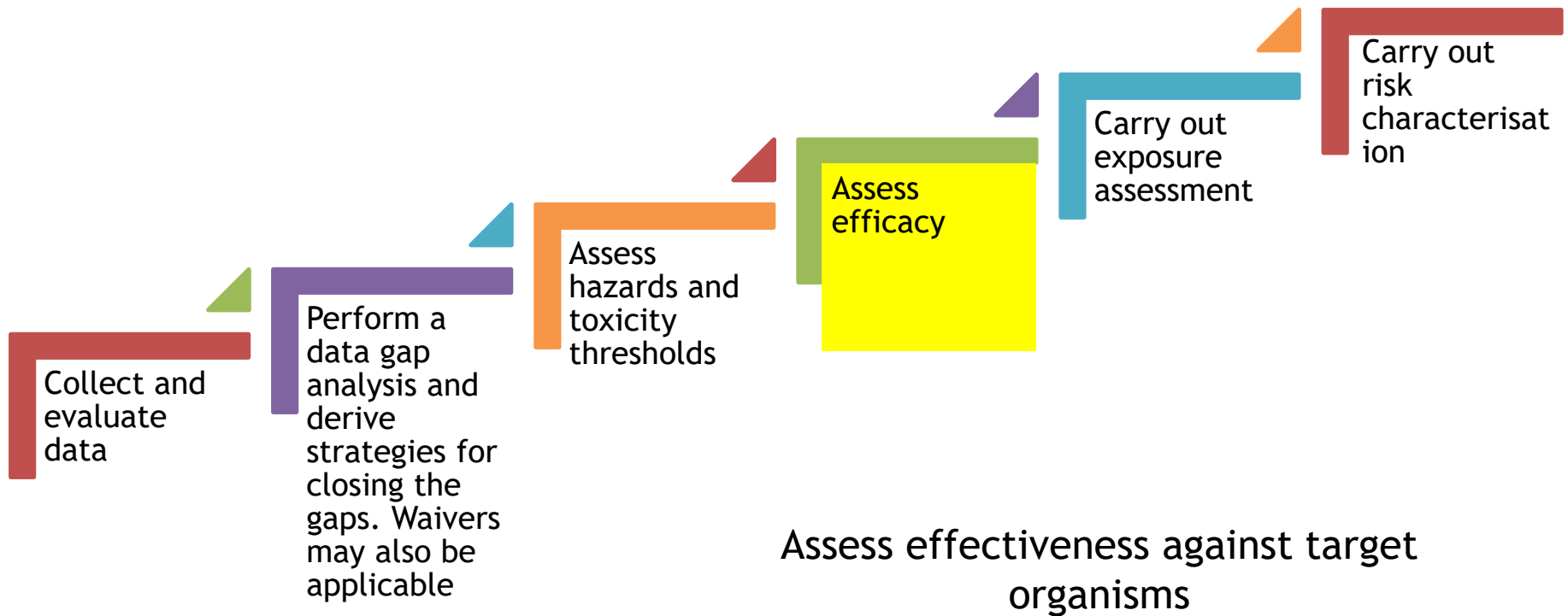
# DERIVING HAZARDS AND THRESHOLDS



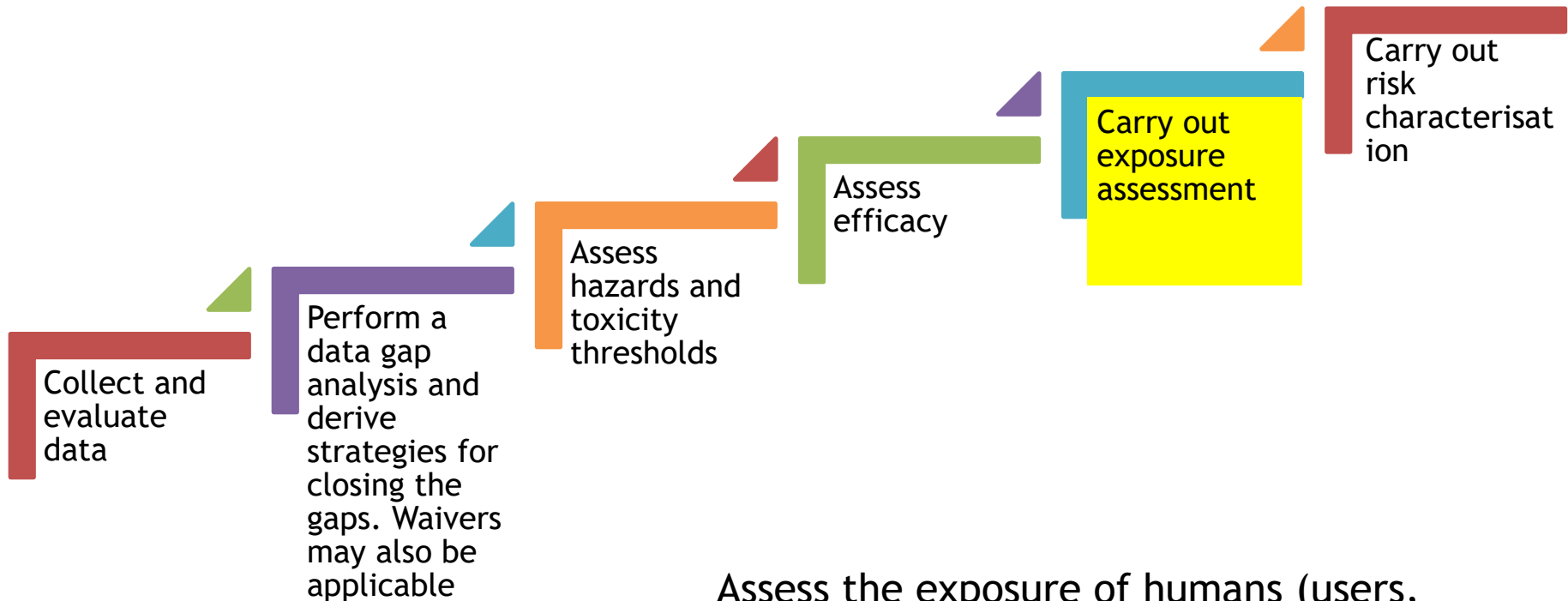
Use collated data to assess the hazards of the substance i.e. acute toxicity, irritation, reproductive toxicity

Derive toxicity threshold using the toxicity data i.e. the level that is not dangerous to humans or environment

# ASSESS EFFICACY



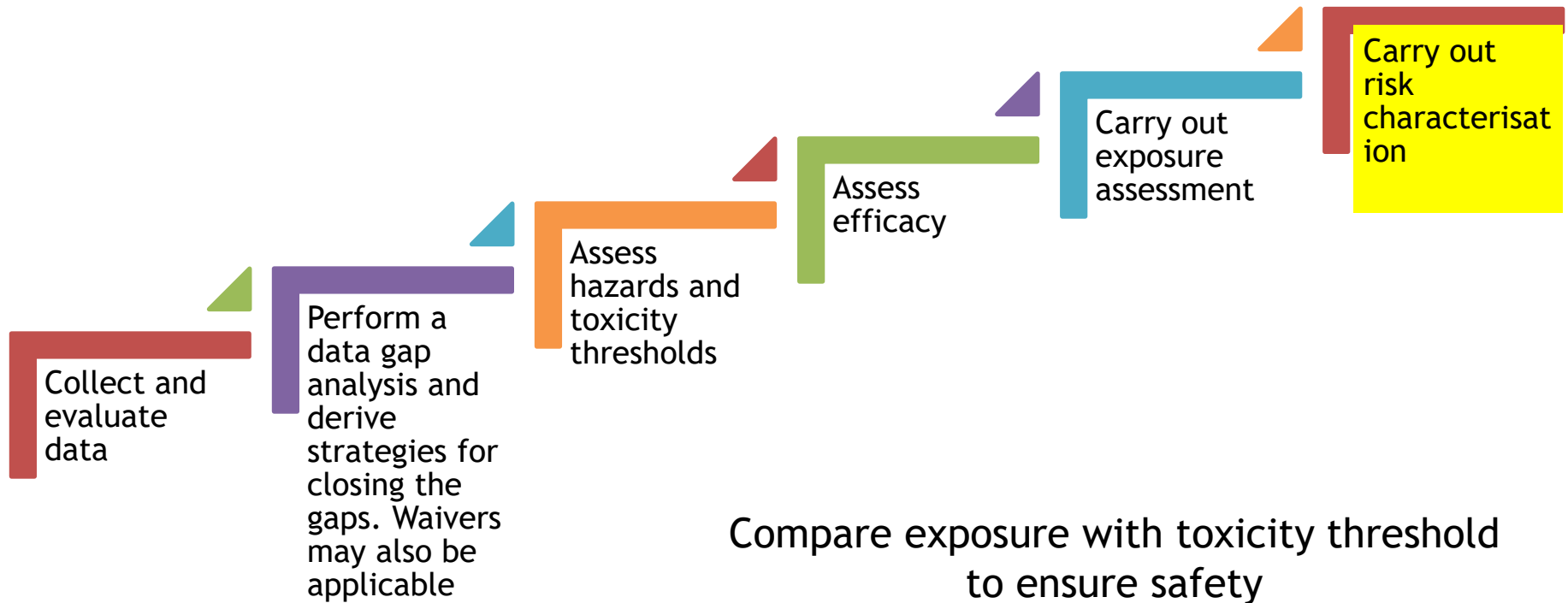
# ASSESS EXPOSURE



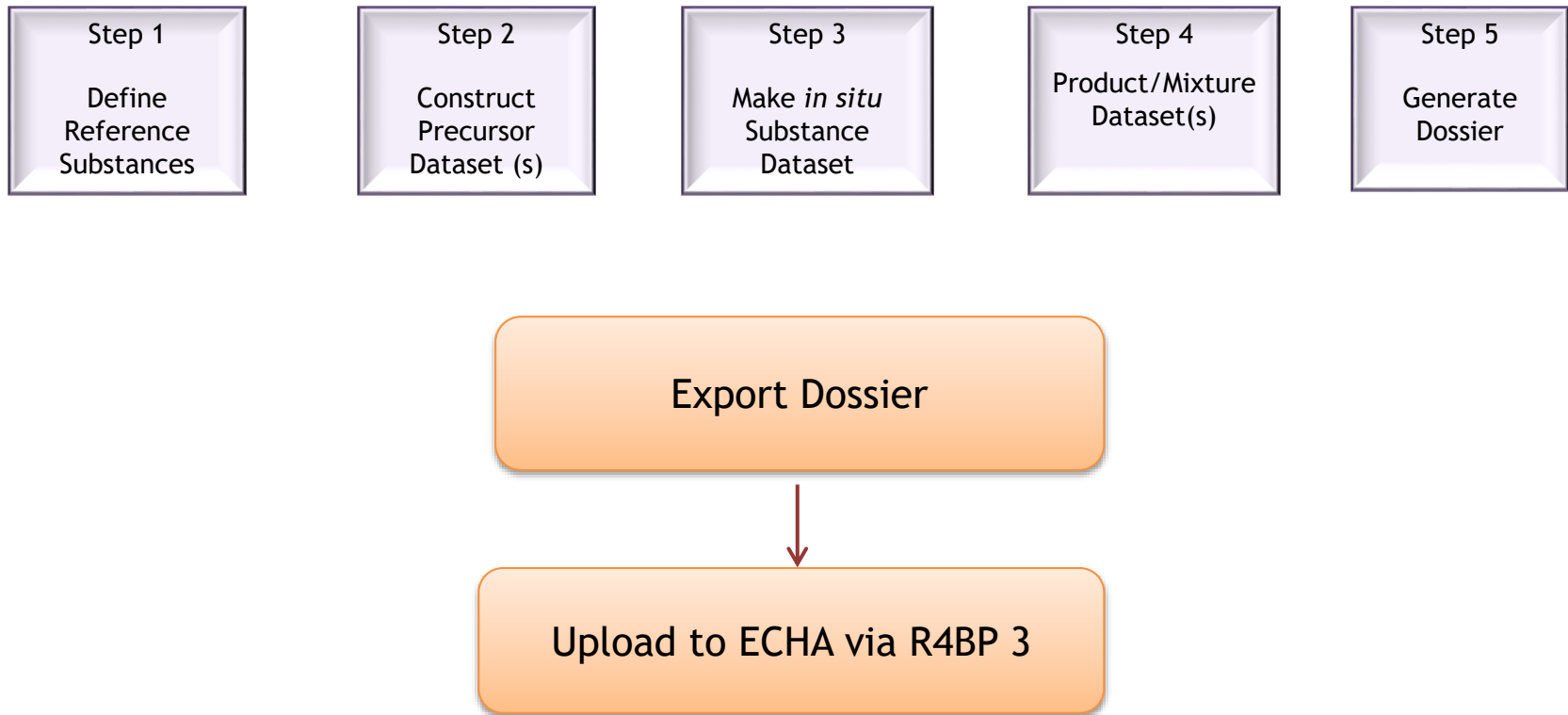
Assess the exposure of humans (users, bystanders, general public) using EU standard models (ECETOC TRA (Chesar), BEAT, ConsExpo)



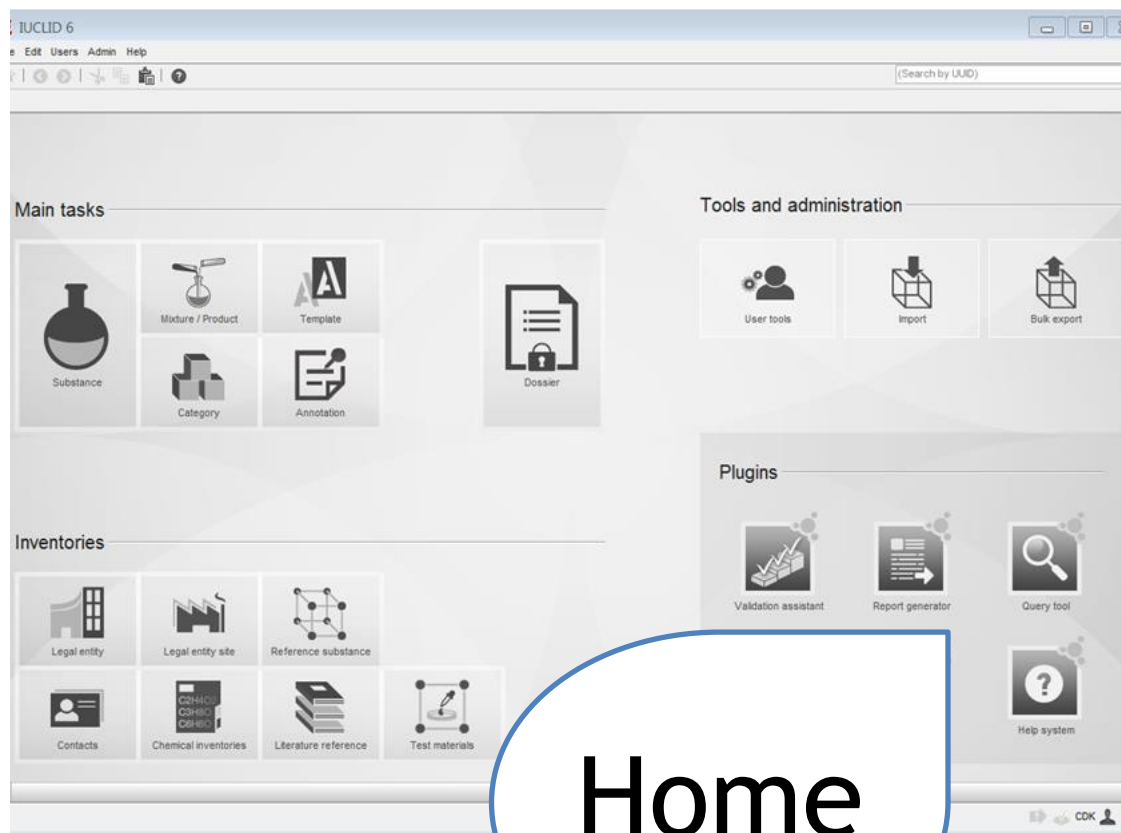
# CHARACTERISE THE RISK



# TECHNICAL DOSSIER



# IUCLID 6



# IUCLID 6

**Dossier creation wizard**

Select submission type: Select a submission type, which meets your specific requirements: regulatory programme, type of dossier, tonnage band, member of a joint submission, etc.

The dossier/export template is used to determine which substance or mixture/product documents will be selected by default. The selection can be modified manually in a subsequent step of the dossier creation/export process.  
Note that all referenced documents will be automatically detached.

**Mixture/Product**

Select submission type for a Mixture/Product

- CORE**
  - Complete table of contents
- OECD**
  - OECD harmonised templates
- EU\_BPR**
  - BPR Active substance application (representative product)
  - BPR Biocidal product authorisation

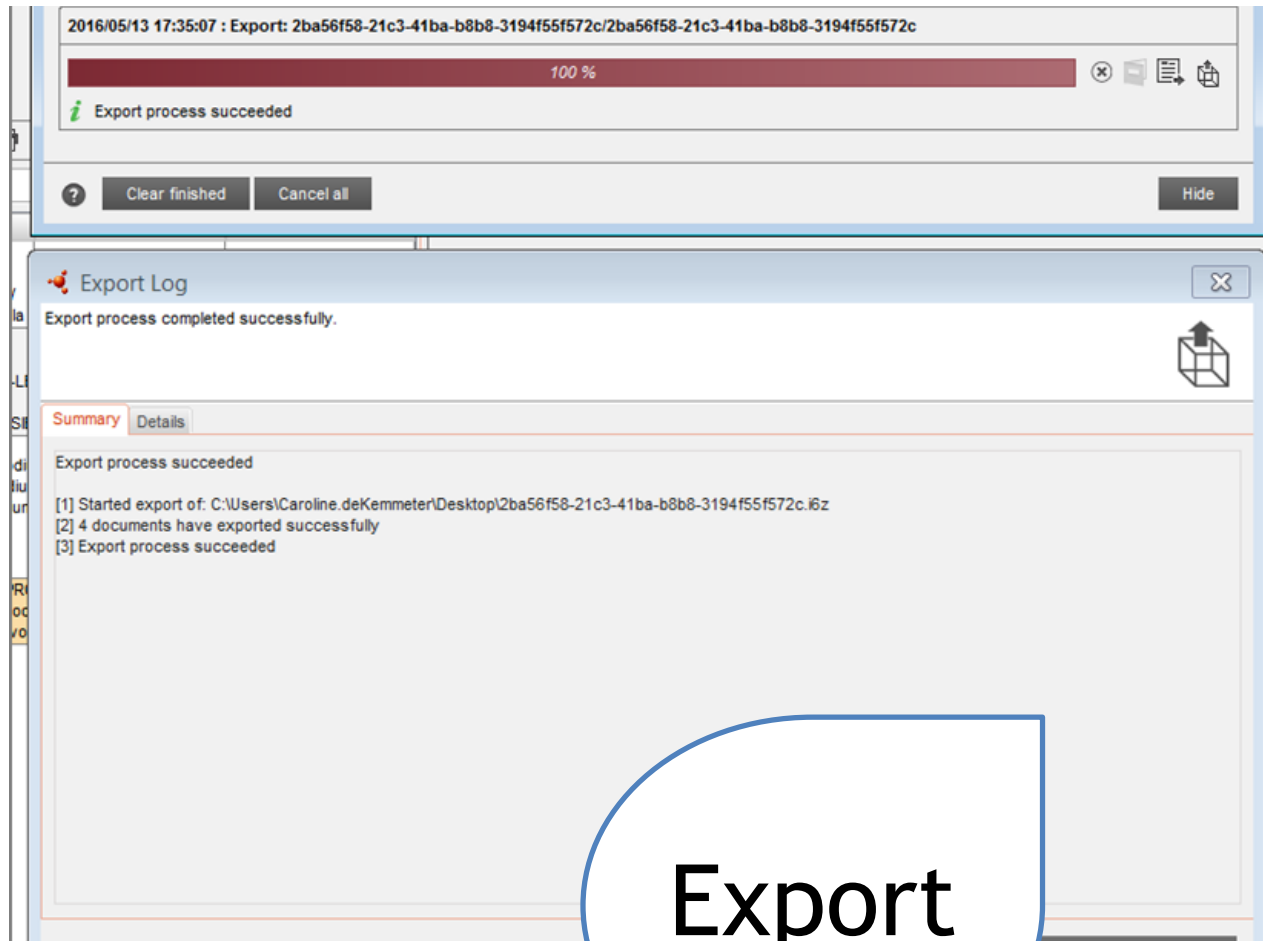
Use advanced settings

? Select submission type

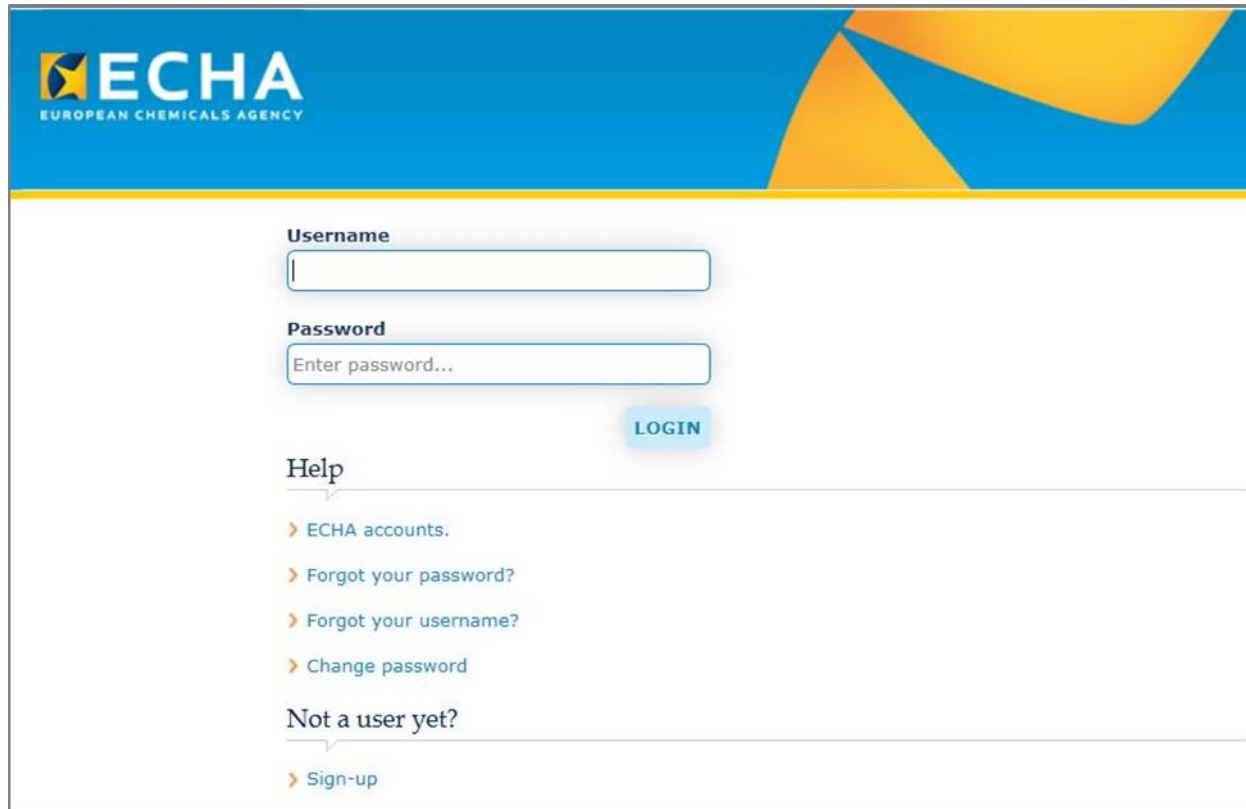
Cancel

Dossier  
creation

# IUCLID 6



# R4BP3



The image shows the ECHA login page. At the top left is the ECHA logo with the text 'EUROPEAN CHEMICALS AGENCY'. The page has a blue and yellow header. Below the header, there are two input fields: 'Username' and 'Password'. The 'Password' field has a placeholder text 'Enter password...'. To the right of the 'Password' field is a blue 'LOGIN' button. Below the login fields, there are two sections: 'Help' and 'Not a user yet?'. The 'Help' section has a list of links: 'ECHA accounts.', 'Forgot your password?', 'Forgot your username?', and 'Change password'. The 'Not a user yet?' section has a link: 'Sign-up'.

**ECHA**  
EUROPEAN CHEMICALS AGENCY

**Username**

**Password**

**LOGIN**

**Help**

- › ECHA accounts.
- › Forgot your password?
- › Forgot your username?
- › Change password

**Not a user yet?**

- › Sign-up

# R4BP3

The screenshot displays the ECHA R4BP3 user interface. At the top left is the ECHA logo (European Chemicals Agency). A navigation bar contains tabs for TASKS, MESSAGES, CASES, ASSETS, and NEW APPLICATION, with a close button (X) on the right. Below the navigation bar, the user is identified as 'ffu' on behalf of 'ReachCentrum (BE)'. The main content area is divided into two columns. The left column features a 'Tasks due to expire' section with a table and a 'See all tasks here' link. Below it is a 'My messages' section with a table. The right column contains a 'GOOD TO KNOW' section with a warning icon and three bullet points defining 'Asset', 'Case', and 'Event'.

**ECHA**  
EUROPEAN CHEMICALS AGENCY

TASKS MESSAGES CASES ASSETS NEW APPLICATION X

You are ffu on behalf of **ReachCentrum (BE)** ▾

**Tasks due to expire**

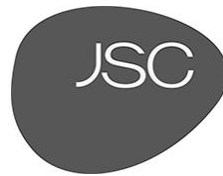
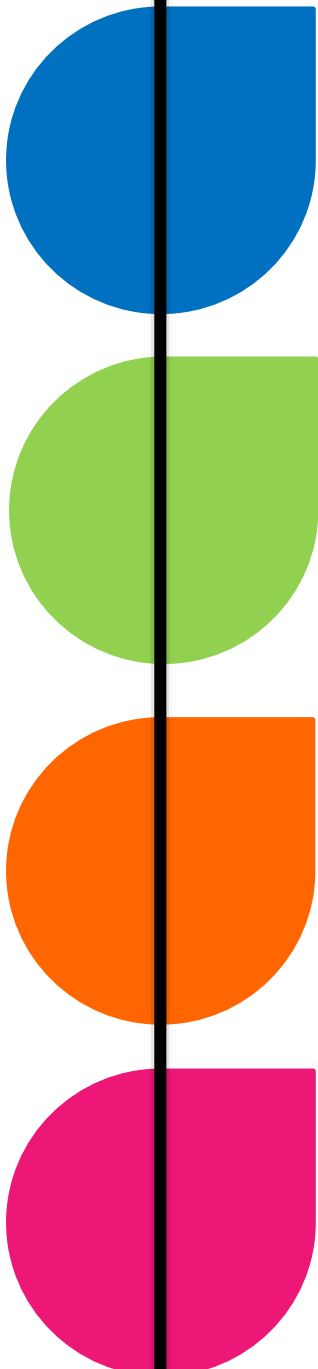
Task name	Product/Substance name	Active substances	Due date	Case type
<a href="#">See all tasks here</a>				

**My messages**

From	Topic:Subject	Product/Substance name	Received
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**GOOD TO KNOW:**

- **Asset** - In the R4BP 3 context, an asset is a regulatory decision on an application (with a unique asset number) related to either an active substance (e.g. a decision on technical equivalence or the Article 95 list) or a biocidal product (e.g. a national authorisation or a Union authorisation).
- **Case** - A case relates to an application and is created after the successful submission of an application (with a unique case number) in R4BP 3 by the Industry users. It includes all the steps in the application process which lead to the creation of, or update of, an asset (the regulatory decision). The purpose of a case is to manage and view the progress of the submission by both the Industry and Authority users.
- **Event** - An event is a step whereby information is submitted that is needed in the handling / processing of an application. Examples include the submission of an application, the submission of additional information on the request of the authorities, fee payment, and the communication of a



# Thank you for your attention

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