

To the European Chemical Agency  
Biocidal Product Committee  
Via email: bpc@echa.europa.eu

The Netherlands, 05-07-2021

## **Minority position of the Dutch Competent Authority (CA) regarding the Union authorisation application for a product containing active chlorine (from chlorine) for PT 2 and 5, discussed at BPC-39**

The Dutch Competent Authority raised concerns on the safety of this product. In view of the character and risk profile of chlorine gas the Dutch CA is of the opinion that as precaution additional safety measures are needed to guarantee the safety of the professional user and the workers present once the product is deployed. We proposed additional RMMS (see below).

The Dutch CA considers the RMMS in section 5.2 of the SPC, as decided at BPC-39, insufficient as precautionary measures to safeguard the safety for the workers as mentioned. Therefore, the Netherlands voted against the opinion and submits an minority opinion.

### **Draft SPC at BPC-39**

*“For connecting or disconnecting the product containers as well as for maintenance or repair of the gas pipe system, the following risk mitigation measures (RMMS) are mandatory:*

- *an alarm system is in place with initiates safety procedures like wearing RPE (EN141B);*
- *application of LEV (according to the national legislation) and low-pressure/vacuum are in place to avoid chlorine emission;*
- *the electrochemical sensors used for measurements detect various chlorinated species additional to chlorine itself;*
- *sensors are measuring exposure also when the operators are using RPE (EN141B)”*
- *the alarm system and the sensors react clearly if the concentration of chlorine gas is higher than 0,5 mg/m<sup>3</sup> (or lower according to national legislation) [this RMM was added over during the BPC-meeting.]*

### **Suggested additional RMMS for SPC section 5.2 in yellow:**

For connecting or disconnecting the product containers as well as for maintenance or repair of the gas pipe system, the following risk mitigation measures (RMMS) are mandatory:

- **all workers present wear RPE;**
- an alarm system is in place with initiates safety procedures like wearing RPE (EN141B);
- application of LEV (according to the national legislation) and low-pressure/vacuum are in place to avoid chlorine emission;
- the electrochemical sensors used for measurements detect various chlorinated species additional to chlorine itself;
- sensors are measuring exposure also when the operators are using RPE (EN141B);
- the alarm system and the sensors react clearly if the concentration of chlorine gas is higher than 0,5 mg/m<sup>3</sup> (or lower according to national legislation)

**During use of this biocide, the following risk mitigation measures (RMMS) are mandatory:**

- **an alarm system is in place with initiates safety procedures like wearing RPE (EN141B);**

- application of LEV (according to the national legislation) and low-pressure/vacuum are in place to avoid chlorine emission;
- the electrochemical sensors used for measurements detect various chlorinated species additional to chlorine itself;
- sensors are measuring exposure also when the operators are using RPE (EN141B);
- the alarm system and the sensors react clearly if the concentration of chlorine gas is higher than 0,5 mg/m<sup>3</sup> (or lower according to national legislation)