

18 September 2023

**Minority opinion of the German Competent Authority (CA) on the BPC opinion concerning the application for approval of DBNPA for product-type (PT) 6**

The German CA does not agree with the conclusions of the environmental risk assessment. It is of the opinion that the level of risk related to the endocrine disruptor (ED) properties of DBNPA in relation to non-target organisms cannot be considered acceptable since a number of uncertainties remain based on the presented background levels of bromide. The German CA agrees that the environment is already exposed to bromide to a certain extent. However, the concentrations introduced into the environment from the biocidal uses in PT 6 are in the range of the background levels of bromide found in the environment reported by the evaluating CA (eCA) in the CAR. Furthermore, it needs to be considered that there might be areas with lower bromide in the background such as rural areas with only limited industrial activity. Consequently, it cannot be excluded that the background concentration of bromide in the exposed areas could be exceeded due to releases from DBNPA biocidal use in PT 6 and the DBNPA derived bromide may provide an additionally bromide source for the environment. In the opinion of the German CA, this is quite critical. The argument that this addition does not give rise to concern is not plausible in the view of the German CA, especially considering that it was agreed between Member States that no safe thresholds with regard to the ED properties can be derived for environmental non-target organisms at this point in time.