

## **Public consultation on potential candidates for substitution**

Substance name: Formaldehyde

Product Type: 2,3

Intended Use: For use in private area and public health area disinfectants and other biocidal products, as surface disinfectant (general and epidemic) For use in veterinary hygiene biocidal products, for disinfection of animal housing

EC Number: 200-001-8

CAS Number: 50-00-0

Evaluating competent authority: Germany

## **third party submission of information on potential candidates for substitution**

### **NON-CONFIDENTIAL**

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## TABLE OF CONTENTS

1. ALTERNATIVE IDENTITY AND PROPERTIES .....	3
2. TECHNICAL FEASIBILITY .....	3
3. ECONOMIC FEASIBILITY.....	3
4. HAZARDS AND RISKS OF THE ALTERNATIVE.....	3
5. AVAILABILITY .....	3
6. CONCLUSION ON SUITABILITY AND AVAILABILITY OF THE ALTERNATIVE .....	3
7. OTHER COMMENTS .....	4
REFERENCES .....	4
APPENDIXES.....	4

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## **1. ALTERNATIVE IDENTITY AND PROPERTIES**

We refer to the submission by our members AVIAGEN and BPC, British Poultry Council. We add to that that the common experience with the use of formaldehyde and other substances when cleaning and disinfecting poultry houses and hatching eggs learns that with the knowledge of today formaldehyde cannot permanently be replaced by other substances and therefore formaldehyde should remain available for veterinary use to disinfect poultry houses, hatching eggs and hatcheries including the equipment. We are aware of the risks and therefore sufficient and strict protection measures are and need to be taken when formaldehyde is used for disinfection to protect occupational health.

Formaldehyde is essential for the hatchery businesses because

- it guarantees bio-security and minimizes the risk of outbreaks
- it provides very efficient disinfection of all rooms in the hatchery, as well as all incubators (in particular the hatchers as they face higher contamination pressure)
- it is, unlike most alternative products, compatible to hatchery equipment material in terms of corrosion and degradation (metals, plastics, rubbers, ... used in the hatchery)
- it is practical to distribute in the complete hatchery, guaranteeing its consistent application throughout the year
- no need to apply it in large volumes, so it can be applied per individual incubator
- surface contact is much better with formaldehyde as it is a gas compared to fluid substances or in fogged form that cannot easily reach all the places to be disinfected.
- it is to date the most effectively and efficiently affordable answer to creating an adequate biosecure environment in the farm to fork food safety policy.

## **2. TECHNICAL FEASIBILITY**

[Insert text here]

## **3. ECONOMIC FEASIBILITY**

[Insert text here]

## **4. HAZARDS AND RISKS OF THE ALTERNATIVE**

[Insert text here]

## **5. AVAILABILITY**

[Insert text here]

## **6. CONCLUSION ON SUITABILITY AND AVAILABILITY OF THE ALTERNATIVE**

[Insert text here]

## **7. OTHER COMMENTS**

Formaldehyde gas as a fumigant has proved to be a very effective substance of destroying micro-organisms on eggs, egg cases, chick boxes, hatching machines and other hatchery equipment, provided these items have been subjected to preliminary cleaning.

Formaldehyde has also been proven very active and efficient in the disinfection of poultry houses to control zoonosis and contagious diseases.

Disinfectants on basis of formaldehyde achieve the best hygiene-score. Many alternates may contain partly formaldehyde too. The business operators in the poultry chain, both eggs and meat, will have great difficulty to comply with the microbiological quality requirements (conditions and criteria) if the use of formaldehyde would not prohibited.

Continuous research is done to find substances and methods for an efficient, safe and practical disinfection. However experts did not succeed yet to find a good alternative for formaldehyde with the same efficacy (broad-spectrum action in the presence of organic matter) and practicability (not corrosive) to inactivate bacteria particularly in the hatchery.

The availability of different substances for disinfection will promote a successful biosecurity policy and with the European food safety policy from farm to fork both animal and public health will benefit from this. Therefore formaldehyde is still a very important disinfectant for the industry and its application in both the hatchery and poultry houses will support also the continuing removal of antibiotic use in chicks.

## **REFERENCES**

[Insert text here]

## **APPENDIXES**

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