MINISTRY
OF ECONOMY
OF THE SLOVAK REPUBLIC

Centre for Chemical Substances and Preparations
Biocides Unit
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Biocidal Product Committee
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BPC-37: SK minority opinion on BPC opinion on N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine for product type 8

During the 37 BPC meeting that took place 2 December 2020 the representative of the Slovak Republic (SK) voted against the BPC opinion on non approval on N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine for PT 8. SK holds the opinion that safe use for this substance was identified. SK position is explained in the following text.

According to Article 4(1) of Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products (the BPR) an active substance shall be approved for an initial period not exceeding 10 years if at least one biocidal product containing that active substance may be expected to meet the criteria laid down in point (b) of Article 19(1) taking into account the factors set out in Article 19(2) and (5). In particular, the compliance of the assessment with the conditions in Article 19(2)(a) was doubted in the BPC opinion.

Two possibilities as worst case conditions and leading to a safe use were presented during the BPC discussion.

SK does not agree with the BPC opinion that 3 cycles per day during vacuum pressure treatment represent the realistic worst case and must therefore be used, and that 2 cycles are difficult to be enforced. SK is of the opinion that 2 cycles specified in the labelling represent realistic and enforceable scenario suitable for operator exposure assessment. If 2 cycles are considered then an acceptable human health risk assessment is obtained and safe use is possible.

Decreasing the working solution active substance concertation from 0.025 % to 0.02 %, leads to decrease in the active substance dose taken up by the wood to 2.3 kg/m^3. If the minimum efficacy value of 2.3 kg/m^3 is utilised then this results in a safe use. It was also confirmed by the chair of the efficacy WG that this dose ensures sufficient efficacy.

Taking into account the above, SK is of the opinion that safe use for N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine for PT 8 has been identified and N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine for PT 8 should be approved for use as wood preservative.

Best regards

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(BPC member)