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## **BPC-39: Minority Opinion of the Finnish Competent Authority on BPC Opinion on Union Authorisation Application for Christiansen LD Bednet Containing Permethrin**

Finnish CA raises concerns that the active substance permethrin in the product Christiansen LD Bednet was not considered as a candidate for substitution and comparative assessment of the product was not carried out. At WG-III-2019 it was agreed that permethrin meets vP- and T-criteria. Thus, according to the article 10(1)(d) and 23 of the Regulation (EU) 528/2012 (BPR) permethrin should be considered as a candidate of substitution and evaluating CA should perform a comparative assessment as part of the evaluation of an application for Union authorisation.

Finnish CA commented Christiansen LD Bednet during the Union authorisation commenting phase but the evaluating CA stated that according to their knowledge no final agreement at the BPC level was made for permethrin and therefore it was not considered as a candidate for substitution in the evaluation and no comparative assessment was carried out. No further discussion on this issue was made before the BPC-39.

Finnish CA is of the opinion that WG agreement on the vP- and T-criteria were sufficient to consider permethrin as a candidate for substitution without further confirmation at the BPC-level. It was also discussed at the 92<sup>nd</sup> CA meeting<sup>1</sup> that when the WG meeting conclude that PBT-criteria are met this decision is valid without further confirmation at the BPC. Therefore, adoption of the opinion at the meeting was not appropriate.

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<sup>1</sup> CA-June21-Doc.4.5 Consequences for authorisation of biocidal products of new information becoming available on a substance contained in the product