

## Fecc Good practice Guidance



### STORAGE TANK MANAGEMENT FOR BIOCIDAL ACTIVE SUBSTANCES

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## INTRODUCTION

## Chemical distributor in the supply chain



- Distributors effectively links the Biocide Active Substance manufacturers and the users
- To ensure business and delivery distributors regularly needs more than one supplier of a Biocidal Active Substance (AS)
- In the same way that different sources of the same AS can be used for the same Biocidal Product, it is possible to store the AS in the same storage tank
- Learning and inspiration from practical food and feed grade storage tank management



## STORAGE TANK MANAGEMENT FOR BIOCIDAL ACTIVE SUBSTANCES

### Learning and inspiration from practical food and feed grade storage tank management ...

Examples:

Food grade  
Ethanol, Sulfuric acid,  
Acetic Acid

Feed grade  
Formic Acid

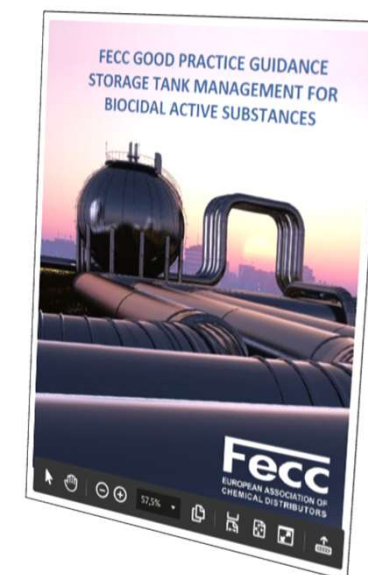


## STORAGE TANK MANAGEMENT FOR BIOCIDAL ACTIVE SUBSTANCES

**Points considered in the Fecc good practice guidance**

While some Biocidal Active Substances enters the supply chains in a contained form others enter the supply chains in bulk form via road tankers. This calls for storage tank management inclusive approaches for

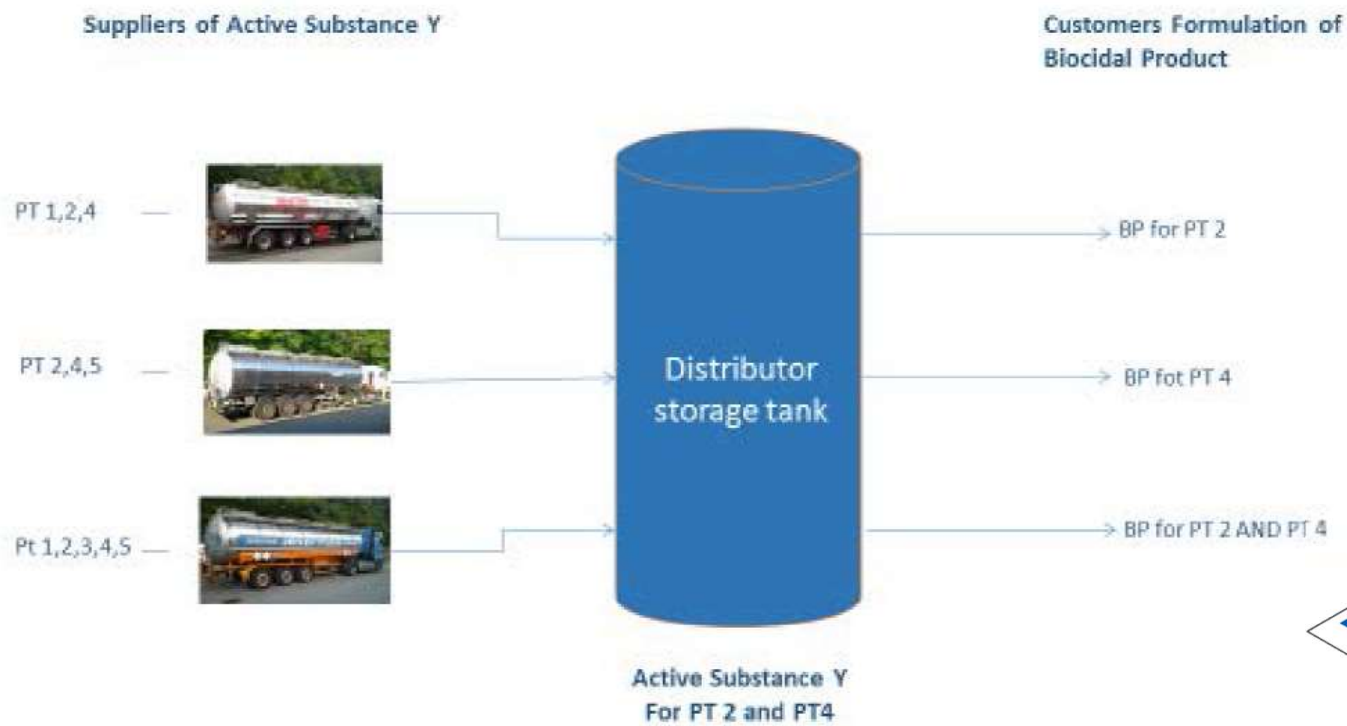
- Different §95 sources in the same storage tank
- PT management
- Evt. traceability via batch number management
- Evt. management of expiry date
- Customer communication regarding their Biocidal Product dossiers



# ACTIVE SUBSTANCE FROM MORE THAN ONE SUPPLIER

## PT management

The Active Substances should be approved for the same Product Types, PT (if there would be differences to the PTs from different sources, just the common denominator for the PTs could be supported by the distributor).

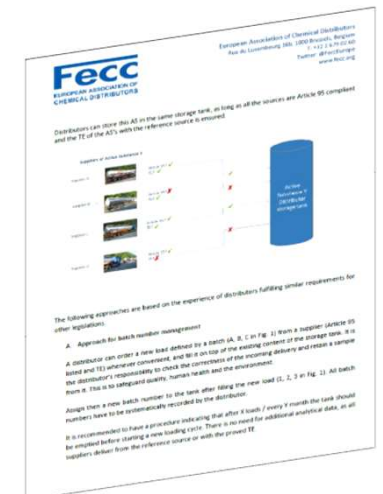


# ACTIVE SUBSTANCE FROM MORE THAN ONE SUPPLIER

## Management of different §95 sources in the same tank

Here are 3 possible situations:

- i. All the suppliers are listed under §95 and the AS's are Technically Equivalent (TE)
- ii. The distributor is listed under §95 and has TE per supplier
- iii. Some suppliers and the distributor are listed under §95 with TE



**ACTIVE SUBSTANCE FROM MORE THAN ONE SUPPLIER**

**Management of different §95 sources in the same tank**

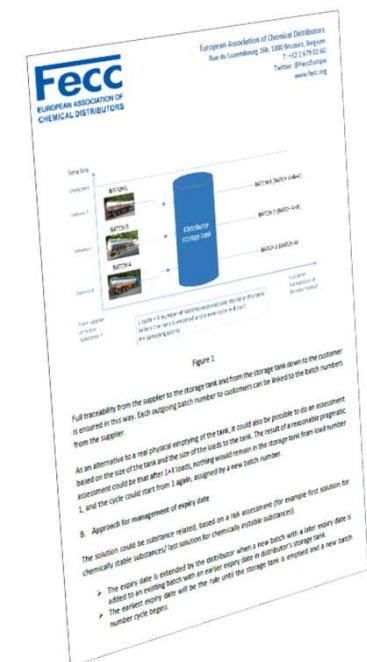
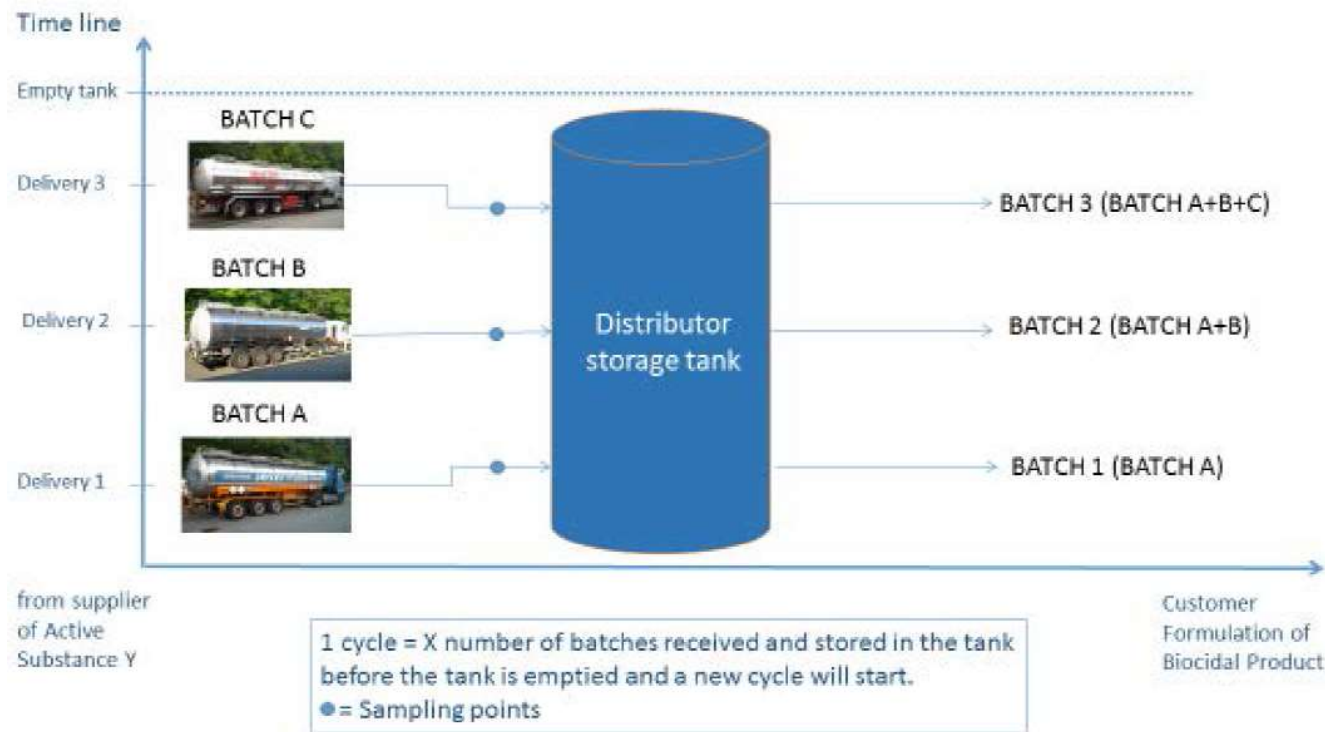
Distributors can store this AS in the same storage tank, as long as the sources are §95 compliant and the TE of the AS's with the reference source is ensured.



## DISTRIBUTORS EXPERIENCE

# Approach for batch number management

This approach and the following approach are based on the experience of distributors fulfilling similar requirements for other legislations.





## DISTRIBUTORS EXPERIENCE

### Approach for management of expiry date

The solution could be substance related, based on a risk assessment (for example first solution for chemically stable substances / last solution for chemically instable substances).

- The expiry data is extended by the distributor when a new batch with a later expiry data is added to an existing batch with an earlier expiry date in distributor's storage tank.
- The earliest expiry date will be the rule until the storage tank is emptied and a new batch cycle begins.



## ACTIVE SUBSTANCE FROM MORE THAN ONE SUPPLIER

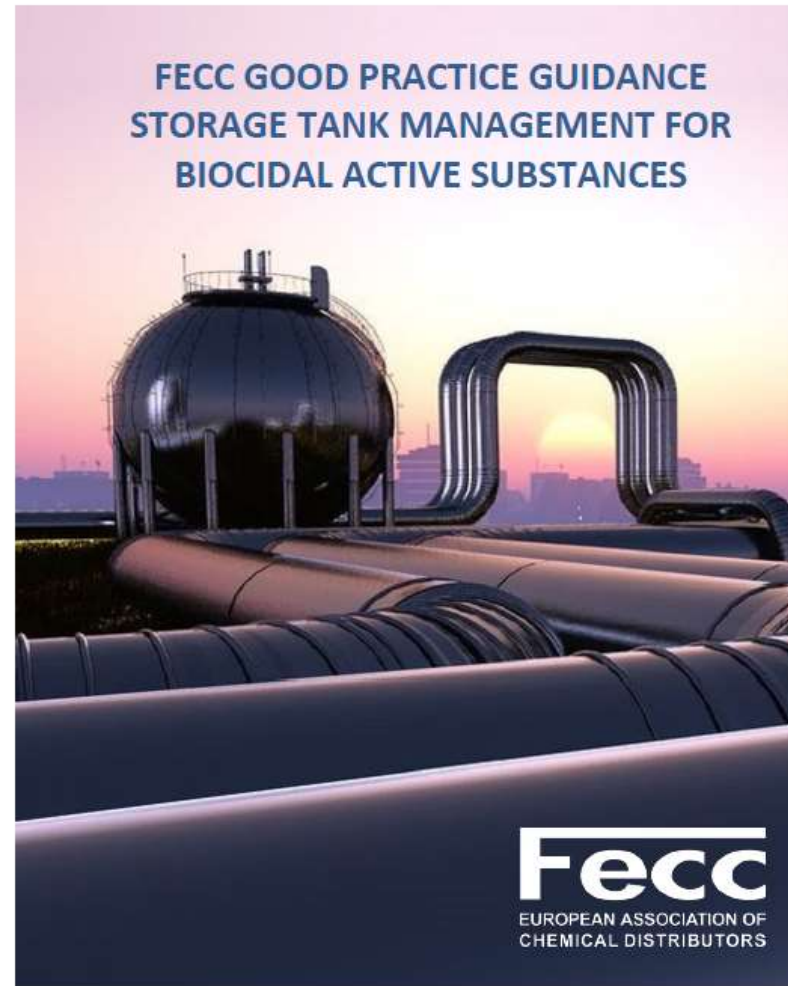
### Customer communication

..... And at last but not least:

For delivery of the AS to the customer for Biocidal Product formulation, it should be ensured that all customers have included relevant suppliers / manufacturers in their Biocidal Product dossiers.



*A closing remark:* Eventual guidance follow-up under consideration to cover the Active Substance Hypochlorite



Thank you for your attention 😊