

9 December 2021

Minority opinion of the German Competent Authority (CA) on the proposal for approval of DBNPA in PT 4 in relation to the conclusions of the environmental risk assessment

The German CA is very concerned that far-reaching decisions are being made here for an identified endocrine disruptor (ED) that will set a precedent for all future evaluations of identified EDs under the BPR. The German CA is of the opinion that the level of risk related to the ED properties of DBNPA in relation to non-target organisms cannot be finally assessed based on the presented background levels of bromide as a number of uncertainties remain.

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 4 are in the same order of magnitude. 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.

Although the German CA agrees that DBNPA in PT 4 is applied in industrial areas, the release pathway in the environment is via the STP in surface water which could be far away from these industrial areas and also far away from the sea where the natural bromide background concentrations are indeed higher. 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 4. In the opinion of the German CA, this is quite critical.

Moreover, the DBNPA derived bromide provides an additionally bromide source for the environment. The argumentation that this addition will not give rise to concern is, in the opinion of the German CA, not plausible - especially taking into account that it was agreed between MS that no safe thresholds can be derived for environmental non-target organisms at this point in time.

Hence, there are too many uncertainties associated with the assessment to obtain such a far-reaching decision as it is needed here for an identified ED and the German CA is quite concerned that a serious precedent will be set here for all future evaluation of identified EDs under the BPR.