



**Ministry of Environment
of Denmark**

Environmental
Protection Agency

Chemicals & Biocides
Case No 2024 - 16818
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European Chemicals Agency
Biocidal Products Committee
Joost van Galen

BPC-50: Minority opinion on the proposal for approval of silver zinc zeolite in product types 2, 7 and 9

The Danish Competent Authority (DK CA) disagrees with the conclusion made on the endocrine disrupting (ED) properties for human health of the active substance silver zinc zeolite. The BPC Human Health Working Group (HH WG) concluded that silver zinc zeolite does not have ED properties.

During the discussion of the substance in the HH WG, DK raised the concern that the evaluation of the observed effects in the dossier was not in line with the previous evaluation and advice given by the Endocrine Disruptor Expert Group (ED EG) on another biocidal active substance with similar effects. With this conclusion on the ED properties for silver zinc zeolite, a discrepancy in the evaluation of ED properties is established.

Silver zinc zeolite was discussed in the ED EG, during which it was not possible to conclude. A subsequent revised evaluation of the same data led to the conclusion that silver zinc zeolite does not have ED properties and there is no data gap. The revised conclusion has not been discussed in the ED EG afterwards. It is the opinion of the DK CA that the revised evaluation and conclusion on the ED properties should have been brought back to a second discussion at the ED EG. Thereby, a harmonised approach to whether there was a data gap in the available information and equal treatment of the applicants would be ensured.

We believe the approval should have been adopted with the conclusion that no conclusion on the ED properties for human health is possible. In the spirit of harmonisation, we therefore submit a minority opinion on the approval of silver zinc zeolite in product types 2, 7 and 9.

Yours sincerely,

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