

<b>Section A6</b>	<b>Food and feedingstuffs</b>	
<b>Annex Point A6.15</b>		
<b>JUSTIFICATION FOR NON-SUBMISSION OF DATA</b>		Official use only
<b>Other existing data</b> [ ]	<b>Technically not feasible</b> [ ]	<b>Scientifically unjustified</b> [x]
<b>Limited exposure</b> [ ]	<b>Other justification</b> [ ]	
<b>Detailed justification:</b>	<p>This point covers 6.15.1 to 6.15.6 !</p> <p>According to the 'Technical Guidance Document on data requirements' this is an additional data requirement and under IIIA 6.15 the following is cited:</p> <p>"If the active substance is to be used in preparations for use where food for human consumption is prepared, consumed or stored, or where feedingstuff for livestock is prepared, consumed or stored, the tests and results in accordance with paragraphs A6.15.1-6.15.5. shall be required."</p> <p>Lactic acid is a naturally occurring substance in the human body and in human food, and is also authorized to be used as a food additive. As the exposure due to the use of biocidal products will not substantially contribute to the total systemic exposure, no data on food and feedingstuffs are deemed necessary. An expert statement on the role of lactic acid in the human body, as well as its presence in food (both naturally and as a food additive) is presented in A6.2-01.</p>	
<b>Undertaking of intended data submission</b> [ ]	Not applicable	
<b>Evaluation by Competent Authorities</b>		
<i>Use separate "evaluation boxes" to provide transparency as to the comments and views submitted</i>		
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>		
<b>Date</b>	2016/12/12	
<b>Evaluation of applicant's justification</b>	<p><b>PT 2 uses</b></p> <p>As the active substance of the representative (dummy) biocidal product, lactic acid is intended to be used as a disinfecting liquid handsoap that is rinsed off the hands after a short contact time. No contact with food or drinking water occurs.</p> <p><b>PT 3 and PT 4 uses</b></p> <p>Lactic acid naturally occurs in various foods such as fruits, fermented dairy products, fermented vegetables, beer and wine. In addition lactic acid is an approved food additive in the EU (E270) and may be used therapeutically in veterinary medicinal products (e.g. in teat dips).</p> <p>Residues in food from the intended PT 3 (disinfectant for udders of dairy cows) and PT 4 (disinfectant for brewery installations) uses of lactic acid are expected to be low compared to naturally occurring levels in food. Therefore, the intended uses do not significantly contribute to consumer exposure to lactic acid. Moreover, lactic acid is permanently present in the human body as it is an endogenous intermediate of mammalian metabolism.</p>	

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<b>Conclusion</b>	Submission of data on food and feedingstuffs is not required.
<b>Remarks</b>	None
	<b>COMMENTS FROM OTHER MEMBER STATE</b> ( <i>specify</i> )
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Evaluation of applicant's justification</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	