

Maisons-Alfort, the 22 October 2021

**Subject: Minority OPI from France on the BPC Opinion on the Active chlorine based products BPF CID LINE PT 2-3-4-5 adopted at the Biocidal Products Committee meeting BPC-40**

The French Competent Authority (Anses) identified a concern regarding the conclusion of the risk assessment for the operator applying the biocidal products by coarse spraying as endorsed by the BPC in the Opinion on biocidal product family **“Active chlorine based products BPF CID LINE PT 2-3-4-5”**.

The coarse spraying application of corrosive products/dilutions is considered acceptable by the Committee as long as the operator is protected with appropriate Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE).

For products classified as corrosive, it is essential to ensure that the operator is not in contact at all with the product, but the coarse spraying is a method leading to a very high exposure of the operator. Therefore FR CA considers that the setting of the appropriate PPE/RPE is very important for the authorisation of this use.

However, a list of possible PPE/RPE available has been added in the Product Assessment Report by the eCA after the Working Group in charge of Human Health (WG TOX) meeting and the acceptability/efficacy of the proposed PPE/RPE for authorising corrosive products have not been discussed within the WG TOX.

In consequence, FR CA considers that the risk assessment for the operator applying corrosive biocidal products by coarse spraying cannot be concluded without a proper discussion by the experts of the WG TOX on the efficacy of the PPE/RPE leading to the absence of exposure of the operator to the corrosive biocidal products during application.