Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products

# PRODUCT ASSESSMENT REPORT OF A BIOCIDAL PRODUCT FAMILY FOR NATIONAL AUTHORISATION APPLICATIONS

(submitted by the evaluating Competent Authority)



# BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE

Product types 2, 4

Active chlorine released from Sodium hypochlorite as included in the Union list of approved active substances

Case Number in R4BP: BC-JQ047866-10 Case Number NA-MIC in R4BP: BC-AY078940-08

**Evaluating Competent Authority: France** 

Date: March 2022

Updated Date: October 2023

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#### O DOSSIER'S HISTORY

#### Note to the reader

This consolidated PAR for the **minor** change application of the product authorisation is based on the PAR of the first authorisation, in which all necessary addenda have been included.

In part 1 and 2 of this consolidated PAR, each section contains the initial assessment and the subsequent successive assessments (minor change, major change, post authorisation data...) the assessments related to the minor change of the product are at the end of each section and are highlighted in grey.

In part 3 of the consolidated PAR: the summary of product characteristics is pointed out and corresponds to the decision for the minor change application.

#### **History of the dossier**

Application type	refMS/ eCA	Case number in the refMS	Decision date	Assessment carried out (i.e. first authorisation / amendment / renewal)	Chapter/ page
NA-APP	MSCA- France	BC-JQ047866-10	14.03.2022	Initial assessment	
NA-MIC	MSCA- France	BC-AY078940-08	06.11.2023	<ul> <li>Minor change application:</li> <li>Modifications of the soiling conditions during use for all Meta SPCs</li> <li>Increase of the self-life for Meta SPCs 1, 3 and 8.</li> <li>Addition of trade names</li> <li>Additions of two manufacturers and three manufacturing sites of the active substance</li> </ul>	

#### 1 CONCLUSION

The biocidal products family, BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE, is based on 1.575% to 15,225 % of sodium hypochlorite, are product types 2 and 4 intended for disinfection. The products of this biocidal family are in the form of, liquid soluble concentrates (meta SPC 1, 2, 5, 8), or as liquid to be applied undiluted (meta SPC 3) for means of disinfection against bacteria, fungi and yeast, by professional and non-professional users.

The BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE is composed of 8 Meta-SPC, 3 of which have been abandoned by the applicant:

- Meta-SPC 1– sodium hypochlorite 2.73%
- Meta-SPC 2 sodium hypochlorite 10.08-15.23%
- Meta-SPC 3 sodium hypochlorite 1.575%
- Meta-SPC 4 abandoned
- Meta-SPC 5 sodium hypochlorite 5.145%
- Meta-SPC 6 abandoned
- Meta-SPC 7 abandoned
- Meta-SPC 8 sodium hypochlorite 2.73%

The biocidal product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE is claimed to be used for:

PTs	Claimed uses	META SPC concerned
2, 4	Use # 1 – Disinfection of surfaces by spraying	1, 2, 3, 5, 8
2, 4	Use # 2 – Disinfection of surfaces by wiping with mop/cloth	1, 2, 5, 8

Conclusions of the assessments of each section are given below:

#### > Physico chemical properties and analytical methods

The physico-chemical properties of the biocidal product family have been described and considered acceptable in the conditions of use detailed in the SPC.

The products of the family should not be stored above 30°C and should be kept protected from direct sunlight. Products of Meta SPC 5 and 8 are foaming formulations.

Shelf life of the Meta SPC 1: 9 months Shelf life of the Meta SPC 2: 3 months Shelf life of the Meta SPC 3: 9 months Shelf life of the Meta SPC 5: 8 months Shelf life of the Meta SPC 8: 9 months

Due to the nature of the active ingredient, products should not be used in conjunction with acids or ammonia. For products with a content of active chlorine higher than 5% (products of Meta SPC 2 and 5), the mention EUH031 "contact with acids liberates toxic gas" is proposed. For products sold to general public and with a content of active chlorine higher than 1% (Meta SPC 1, 2, 3, 5 and 8), the mention EUH 206: "Warning! Do not use together with other products. May release dangerous gases (chlorine)" is applied.

All the products of the family are classified corrosive to metal H290 Met Corr. I. For Meta SPC 5 and 8, DSC tests (performed on one product of each Meta SPC) are required in post authorisation to confirm the non classification for self-reactive properties of the products.

The analytical methods provided are validated for the determination of sodium hypochlorite and sodium chlorate in the biocidal product family.

For Meta SPC 3, the spray particles size distribution after storage is required in post authorisation.

#### > Efficacy

#### First application (2022)

The product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE has shown sufficient efficacy in accordance with the requirements of the guidance on the Biocidal Products Regulation, Volume II Efficacy – Assessment and Evaluation (Parts B+C), Version 3.0, April 2018 and EN 14885:2015 standard for the following uses:

#### **META SPC 1**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C
- Use 2: Disinfection of surfaces by wiping with mop/clothincluded (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C

#### **META SPC 2**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use aplication rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth(PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use aplication rate.

#### **META SPC 3**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 100% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 100% v/v, 20 min, 20 °C

#### **META SPC 5**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth(PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

#### **META SPC 8**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C
- Use 2: Disinfection of surfaces by wiping with mop/cloth(PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C

It has to be noted that according to the efficacy tests submitted, pre-cleaning step has been added and contact time have been increased.

Moreover, the applicant claimed also an efficacy against smell generating organisms. The argumentation provided by the applicant: "Smell generating organisms are bacteria and fungi. As the products have been reported efficient for these organisms, the claim for desodorising is considered relevant". Nevertheless, as no efficacy data according to the requirements of the Efficacy guidance Vol II Part B/C, section 5.4.0.5.4 were provided, we consider that this claim has not been demonstrated.

#### > Substances of concern

One substance of concern, Dodecanenitrile, has been identified for the environnement.

None of the co-formulants contained in the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE family are regulatory identified as endocrine disruptors or have significant ED properties.

#### **Human Health**

For professional users, risks are acceptable for products of meta-SPC 1, 2, 3, 5 and 8 considering the semi-quantitative and qualitative risk assessment for local effects, with the application of risk mitigation measures (RMM) and the condition to wear the personal protective equipment (PPE) listed below:

- Meta-SPC 1 and 2:
  - For mixing and loading (use 1 and 2): gloves, body protection and chemical goggles
- Meta-SPC 3:
  - For application by spraying and post-application task (use 1 only): gloves, body protection and chemical goggles
- For meta-SPC 5 and 8, risks are acceptable for the application by spraying and wiping with a mop with a handle, with the application of risk mitigation measures (RMM) and the condition to wear the personal protective equipment (PPE) listed below:
  - For mixing and loading and post-application task (use 1 and 2) gloves, body protection and chemical goggles
  - For application by spraying (use 1 only): gloves, body protection, chemical goggles and respiratory protective equipment
  - For application by mopping or wiping (use 2 only): gloves, body protection and chemical goggles / Do not dip your hands in the bucket / Apply the product only with a mop with a handle.

Risk is not acceptable for products of meta-SPC 5 and 8 for the application by wiping with a cloth or a mop without a handle, considering the semi-quantitative and qualitative risk assessment for local effects.

For non-professional users, risks are acceptable for products of meta-SPC 1 and 3 considering the semi-quantitative and qualitative risk assessment for local effects, with the application of risk mitigation measures (RMM) listed below:

- Meta-SPC 1:
  - $\circ$  Washing on hands after use
- Meta-SPC 3:
  - Washing on hands after use
  - The product has to be sprayed downward (use 1 only)

For non-professional users, risk is not acceptable for products of meta-SPC 2, 5 and 8 considering the semi-quantitative and qualitative risk assessment for local effects.

RMM (general pubic) (all uses):

- Do not touch the surface until the surface is dried;
- Children should not be present during disinfection.

#### > Indirect exposure via food

By definition PT2 biocidal product is for application on surfaces that are not used for direct contact with food or feeding stuffs. Therefore, residues in food or feed are not expected.

For PT 4 uses, residues in food, feed or drink must be further investigated.

Due to the high reactivity of chlorine species, residues on surfaces degrade very rapidly. Hence, residue formation (other than chlorate) is assumed to be negligible for aqueous solutions of chlorine. Conversely, chlorate residues, a stable metabolite that can be formed from hypochlorite sodium in aqueous chlorine solutions, are considered relevant for dietary exposure from the uses of active substance as food area disinfectant.

Regarding professional use in industrial field, considering the current knowledge about chlorate and the official chlorate limits in food<sup>1</sup>, there is no concern for the general public from indirect exposure to either available chlorine or chlorate in food, feed and drinking water.

Considering the non-professional uses, a food contamination with chlorate via treated surface was estimated using maximalist scenario. No concern for general public from indirect exposure to either available chlorine or chlorate in food is observed when a rinsing of treated surfaces occurs.

#### **Environment**

Risks are acceptable for all the environmental compartments considering a qualitative assessment of the active substance NaOCI leading to negligible emissions to the environment, considering a semi-qualitative assessment of chlorate for groundwater and surface water intended for the abstraction of drinking water, for the following uses:

- PT 2/4: Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth.
- PT 2/4: Disinfection of surfaces by spraying : hard surface (ustensils, equipment, furniture)

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<sup>&</sup>lt;sup>1</sup> COMMISSION REGULATION (EU) 2020/749 of 4 June 2020 amending Annex III to Regulation (EC) No 396/2005 of the European Parliament and of the Council as regards maximum residue levels for chlorate in or on certain products

Risks are acceptable for all the environmental compartments considering a quantitative assessment of the substance of concern: Dodecanenitrile (CAS n° 2437-25-4) only in meta-SPC 8, for the following uses:

- PT 2: Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth.
- PT 2: Disinfection of surfaces by spraying : hard surface (ustensils, equipment, furniture)

For meta SPC 8, in PT04, unacceptable risks in surface water and STP are foreseen for disinfection of hard surfaces in contact with food in the scenario 1 (professional applications on large scale catering kitchen and canteens, slaughterhouse). Risks are acceptable for the disinfection in private areas.

This restriction will be indicated in the SPC for the PT04 uses of META-SPC 8 (for which the SoC is relevant): 'The disinfection of hard surfaces in contact with food is restricted to domestic areas'.

#### **General conclusion**

#### Overall conclusions for the claimed uses:

The conformity to the uniform principles, as defined in the Regulation (EU) n°528/2012, for the biocidal product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE is reported in the table below, for each use.

Meta SPC	PT	Target organisms	Application rate	Uses	Conclusions				
1				Disinfection of hard non porous surfaces by spraying with and without previous cleaning.					
3				Professionals & non-professionals Contact time:5 min	Unacceptable: Efficacy not demonstrated without previous cleaning and				
1				Disinfection of hard non porous surfaces by wipping with and without previous cleaning.	without previous cleaning and within the revendicated contact time.				
				Professionals & non-professionals Contact time: 5 min					
				Disinfection of hard non porous surfaces by spraying with and without previous cleaning.	Unacceptable: Efficacy not demonstrated without previous cleaning and				
2	2			Bacteria Yeast  Disinfection of hard non porous surface wipping with and without previous clear  Professionals & non-professionals Contact time: 5 min		within the revendicated contact time. Efficacy against fungi not			
	& 4	k			Disinfection of hard non porous surfaces by wipping with and without previous cleaning.	demonstraded with respect to the shelflife.			
	Ye		-			Yeast	Yeast Contact time: 5 min		Unacceptable risks for for non- professionnal users due to local effects
							Disinfection of hard non porous surfaces by spraying with and without previous cleaning.	Unacceptable: Efficacy not demonstrated without previous cleaning and within the revendicated contact	
_						Professionals & non-professionals Contact time: 5min	time. Furthermore, efficacy against fungi is not demonstraded with respect to the shelflife.		
5									wipping with and without previous
				Professionals & non-professionals Contact time: 5 min	application by wiping with a cloth or a mop without a handle by professional user due to local effects.				
8	2 & 4			Disinfection of hard non porous surfaces by spraying with and without previous cleaning.  Professionals & non-professionals	Unacceptable: Efficacy not demonstrated without previous cleaning and				
				Professionals & non-professionals Contact time: 5 min					

		<u> </u>			
					within the revendicated contact time.
				Disinfection of hard non porous surfaces by wipping with and without previous cleaning.  Professionals & non-professionals Contact time: 5 min.	Unacceptable risks for for non- professionnal users due to local effects. Unacceptable risks for the application by wiping with a cloth or a mop without a handle by professional user due to local effects
					Risks for the environment for PT4 uses except disinfection of domestic surfaces.
				Disinfection of hard non porous surfaces by spraying after previous cleaning.	
				Professionals & non-professionals	Acceptable
1	2 &	Bacteria Yeast	Dilution : 30	Contact time: - Bacteria & yeast: 15 min. Fungi: 20 min.	
	4	Fungi	% v/v	Disinfection of hard non porous surfaces by wipping after previous cleaning.	
				Professionals & non-professionals	Acceptable
				Contact time: - Bacteria & yeast: 15 min. Fungi: 20 min.	
				Disinfection of hard non porous surfaces by spraying after previous cleaning.	
				Professionals	Acceptable
	2	Bacteria		Contact time: Bacteria & yeast: 15 min.	
2	<b>&amp;</b> 4	Yeast		Disinfection of hard non porous surfaces by wipping after previous cleaning	
				Professionals	Acceptable
				Contact time: Bacteria & yeast: 15 min.	
				Disinfection of hard non porous surfaces by spraying after previous cleaning.	
3	2 &	Bacteria Yeast Ready to use Fungi		Professionals & non-professionals	Acceptable
3	4		Contact time: - Bacteria & yeast: 15 min Fungi: 20 min.	·	

5	2 & 4	Bacteria Yeast	Dilution : 15 % v/v	Disinfection of hard non porous surfaces by spraying after previous cleaning.  Professionals  Contact time:	Acceptable  Acceptable
	2			Disinfection of hard non porous surfaces by spraying after previous cleaning.  Professionals  Contact time:	Acceptable
8	4	Bacteria Yeast Fungi	Dilution : 30 % v/v	Fungi: 20 min.  Disinfection of hard non porous surfaces, in domestic areas, by spraying after previous cleaning.  Professionals  Contact time:  - Bacteria & yeast: 15 min.  Fungi: 20 min.  Disinfection of hard non porous surfaces in domestic areas by wipping with a mop with a handle after previous cleaning  Professionals  Contact time:  - Bacteria & yeast: 15 min.  Fungi: 20 min.	Acceptable

#### > NA-MIC minor change application 2022

Minor change description:

- Modifications of the soiling conditions during use for all Meta SPCs
- Increase of the self-life for Meta SPCs 1, 3 and 8.
- Addition of trade names
- Additions of manufacturers and manufacturing sites of the active substance

#### Conclusion

#### Physico chemical properties and analytical methods minor change

Final long term stability studies were provided in the framework of this dossier for products of Meta SPC 1, 3, and 8. Results allow to grant a shelf life 18 months for Meta SPC 1, 24 months for Meta SPC 3 and 18 months for Meta SPC 8. Physico-chemical properties remain unchanged after storage.

#### Efficacy minor change

The elements presented in the dossier are not sufficient to demonstrate the efficacy of the product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE under dirty conditions, in accordance with the requirements of the guidance on the Biocidal Products Regulation, Volume II Efficacy Parts B+C as no acceptable P2S2 test against bacteria under dirty conditions has been provided. Efficacy assessment supports the shelf-life.

#### Human health and Indirect exposure via food: minor change application 2022

The minor change regarding the extension of the shelf-life for Meta-SPCs 1, 3 and 8 induces an increase of the sodium chlorate concentration at final time in these Meta-SPCs. These new concentrations have been used to perform the classification according to the classification rules. To be noted that the recently adopted RAC opinion (10 June 2021) agreed that sodium chlorate should be classified as Acute Tox 3; H301, with an ATE of 100 mg/kg bw. This new ATE has also be used to review the classification of the meta-SPCS.

These changes have no impact on the classification of the meta-SPCs, the identification of substances of concern and the human health risk assessment.



#### Environnement : minor change application

The minor change regarding the extension of the self-life for Meta SPCs 1, 3 and 8 induces an increase of the chlorate concentrations. However, according to the WG-I-2020, it has been decided that chlorate can be assessed qualitatively for all the environmental compartments. Therefore this minor change has no impact on the environmental risk assessment. Moreover, the highest in-use concentration of chlorate used in the risk assessment remains unchanged as it comes from meta SPC 2. Concerning the other minor changes (modification of the soiling conditions during use for all Meta SPCs; addition of trade names; addition of manufacturing sites of the active substance), they have no impact on classification of the biocidal product, nor on the analysis of the substance of concern, nor on the environmental risk assessment as they do not changes the intended dose rates.

#### 2 ASSESSMENT REPORT

#### **PART I - FIRST INFORMATION LEVEL**

### **2.1** Summary of the product assessment

#### 2.1.1 Administrative information

#### **2.1.1.1** Identifier of the product family

Identifier <sup>2</sup>	Country (if relevant)
BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE	

#### **2.1.1.2** Authorisation holder

Name and address of the	Name	Notilia
authorisation holder	Address	ZI de Grezan
		1284 chemin du Mas de Sorbier
		30000 Nîmes
		France
Authorisation number	FR-2022-0017	
Date of the authorisation	10/03/2022	
Expiry date of the	09/03/2032	
authorisation		

#### **2.1.1.3** Manufacturer(s) of the products of the family

Name of manufacturer	Notilia
Address of manufacturer	ZI de Grezan,
	1284 chemin du Mas de Sorbier
	30000 Nîmes
	France
Location of manufacturing	ZI de Grezan,
sites	1284 chemin du Mas de Sorbier
	30000 Nîmes
	France

#### **2.1.1.4** Manufacturer(s) of the active substance(s)

Active substance	Active chlorine released from sodium hypochlorite		
Name of manufacturer	Inovyn		
Address of manufacturer	Runcorn site HQ, South Parade PO Box 9, Cheshire,		
	WA7 4JE, Runcorn, United Kingdom		
Location of manufacturing	Runcorn site HQ, South Parade PO Box 9, Cheshire,		
sites	WA7 4JE, Runcorn, United Kingdom		

Please fill in here the identifying product name from R4BP.

Active substance	Active chlorine released from sodium hypochlorite		
Name of manufacturer	Inovyn Belgium SA (Acting for Inovyn Europe Limited		
	(UK))		
Address of manufacturer	tue Solvay, 39		
	5190 Jemeppe-sur-Sambre		
	Belgium		
Location of manufacturing	Via Lodi Vecchio 10 26838 TAVAZZANO CON		
sites	VILLAVESCO Italy		

Active substance	Active chlorine released from sodium hypochlorite		
Name of manufacturer	Inovyn Belgium SA (Acting for Inovyn Europe Limited		
	(UK))		
Address of manufacturer	Rue Solvay, 39		
	5190 Jemeppe-sur-Sambre		
	Belgium		
Location of manufacturing	2 Avenue de la République		
sites	39500 TAVAUX		
	France		

Active substance	Active chlorine released from sodium hypochlorite			
Name of manufacturer	Ercros SA			
Address of manufacturer	Av. Diagonal, 598 08014 Barcelona Spain			
Location of manufacturing	Autovia Tarragona - Salou			
sites	C31-B, km 6			
	43480 VILA-SECA 1			
	Spain			

#### 2.1.2 Product family composition and formulation

NB: the full composition of the product according to Annex III Title 1 should be provided in the confidential annex.

Does the product have the same identity and composition as the product evaluated in connection with the approval for listing of the active substance(s) on the Union list of approved active substances under Regulation No. 528/2012?

Yes	$\boxtimes$
No	

#### **2.1.2.1** Identity of the active substance

Main constituent(s)				
ISO name	Sodium hypochlorite			
IUPAC or EC name	Sodium hypochlorite			
EC number	231-668-3			
CAS number	7681-52-9			
Index number in Annex VI of CLP	017-011-00-1			
Minimum purity / content	15.225% (Purity of NaOCl solution), in compliance with the EN 901:2013 (Aqueous solution with an available / active chlorine concentration ≤18% w/w)			
	Sodium chlorate has been identified as a relevant impurity in technical material (max content: 5.4% of active chlorine/available chlorine equiv. to 0.081 – 0.783 % w/w in the biocidal product family).			
Structural formula	Na <sup>+</sup> Cl-O <sup>-</sup>			

#### **2.1.2.2** Candidate(s) for substitution

Active chlorine released from sodium hypochlorite is not candidate for substitution in accordance with Article 10 of BPR.

Common name		IUPAC name	Function CAS number	EC number	Content (%)		
						Min	Max
Sodium hypochlorite as TK with a purity of			Active substance	7681-52-9	231-668-3	1.575	15.225
	Active chlorine from sodium hypochlorite					1.5	14.5
Dodecanenitrile		-	Surfactant	2437-25-4	219-440-1	0	0.05

# **2.1.2.3** Qualitative and quantitative information on the composition of the biocidal product family<sup>2</sup>

Note that no technical material (TC) exists for sodium hypochlorite according to the CAR and reference specifications set at EU level. The technical active substance is defined as an aqueous solution of sodium hypochlorite with a max content of available chlorine set at 180 g/kg. For this dossier, the technical active substance is defined as an aqueous solution of sodium hypochlorite with a claimed purity of 152.25g/kg (15.225%w/w).

The concentration of active chlorine released from sodium hypochlorite has been calculated according to the active substance data from the CAR. In summary, the sodium hypochlorite content has been divided by the conversion factor of 1.05 in order to obtain the concentration of active chlorine released from sodium hypochlorite.

The biocidal product family comprises 5 Meta SPC (8 at the initial submission of the dossier but 3 are no longer supported). The full composition of the family is included in the confidential annex.

#### **2.1.2.4** Information on technical equivalence

Technical equivalence is not necessary because the source of active substance is part of the reference sources of the CAR of sodium hypochlorite.

#### **2.1.2.5** Information on the substance(s) of concern

One substance of concern, Dodecanenitrile, has been identified for the environnement. Please see the confidential annex for further details.

# **2.1.2.6** Assessment of endocrine disruption (ED) properties of the biocidal product family

None of the co-formulants contained in the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE family are regulatory identified as endocrine disruptors or have significant ED properties.

However, that are indications that some co-formulants have ED properties and they should be further assessed in the frame of REACH Regulation.

Hence, it is not possible to conclude whether these co-formulants should be considered to have ED properties or not before the end of the assessment. In case any co-formulants are finally identified as ED, the biocidal product will be considered as ED and authorisation will have to be revised accordingly.

Please refer to the Confidential Annex.

#### **2.1.2.7** Type of formulation

SL - Soluble concentrate (Meta SPC 1, 2, 5, 8)

AL - Any other liquid (Meta SPC 3)

#### PART II - SECOND INFORMATION LEVEL - META SPC 1

**2.1.3** Meta SPC 1 administrative information

#### **2.1.3.1** Meta SPC identifier

<b>Identification</b> Meta SPC 1
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#### **2.1.3.2** Suffix to the authorisation number

#### **2.1.3.3** Product type(s)

Product type(s)	2
	4

#### 2.1.4 Meta SPC 1 composition

# **2.1.4.1** Qualitative and quantitative information on the composition of the meta SPC 1

Common name	IUPAC name	Function	CAS number	EC number	Content (%)	
					Min	Max
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)	2.73 (2.6)

#### **2.1.4.2** Type(s) of formulation of the meta SPC 1

SL – Soluble concentrate

**2.1.5** Hazard and precautionary statements according to Regulation (EC) 1272/2008 of the meta SPC 1

### Classification and labelling of the products of the family according to the Regulation (EC) 1272/2008

[It should also be stated if some P statements triggered by the criteria in CLP has been excluded due to the risk assessment.]

Classification	
Hazard category	Met. Corr. 1
- ,	Skin Irri. 2
	Eye Irri. 2
	Aquatic acute 1
	Aquatic chronic 2

Classification	
Hazard statement	H290: May be corrosive to metals H315: Causes skin irritation H319: Causes serious eye irritation H400: Very toxic to aquatic life. H411: Toxic to aquatic life with long-lasting effects.
Labelling	
Signal words	Warning
Hazard statements	H290: May be corrosive to metals H315: Causes skin irritation H319: Causes serious eye irritation H410: Very toxic to aquatic life with long lasting effect.
Precautionary statements	P234: Keep only in original packaging P264: Wash thoroughly after handling. P273: Avoid released to the environment P280: Wear protective gloves/protective clothing/eye protection/face protection. P302+P352: IF ON SKIN: Wash with plenty of soap and water. P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P321: Specific treatment (see on this label). P332+P313: If skin irritation occurs: Get medical advice/attention. P337+P313: If eye irritation persists: Get medical advice/attention. P362+P364: Take off contaminated clothing and wash before reuse. P390: Absorb spillage to prevent material damage P391: Collect spillage P406: Store in a corrosion-resistant/ container with a resistant inner liner P501: Dispose of contents/container in accordance with the national regulation
Note	EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine). The precausionnary statement P280 does not apply to non-professionnal users.

### 2.1.6 Authorised use(s) of the META SPC 1

### **2.1.6.1** Use description

Table 1. Use # 1 – Disinfection of surfaces by spraying

<b>Product Type</b>	oduct Type PT2, PT4	
exact description of	Disinfection of hard surfaces by spraying (ustensils, equipment, furniture) Without mechanical action	

Target organism (including development stage)	Bacteria Yeasts Fungi			
Field of use	Indoor			
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning			
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts)  20 minutes (fungi)  Temperature: 20°C			
Category(ies) of users	Professional Non-professional			
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE			

2.1.6.1.1 Use-specific instructions for	use
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2.1.6.1.2 Use-specific risk mitigation measures

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2.1.6.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.6.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.6.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.6.2** Use description

Table 2. Use # 2 – Disinfection of surfaces by wiping with mop/cloth

Product Type	PT2, PT4		
Where relevant, an exact description of the authorised use	Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket. Without mechanical action		
Target organism (including development stage)	Bacteria Yeasts Fungi		
Field of use	Indoor		
Application method(s)	Wiping with mop/cloth on hard non-porous surfaces with prior cleaning		
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts)  20 minutes (fungi)  Temperature: 20°C		
Category(ies) of users	Professional Non-professional		
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE		

	2.1.6.2.1	Use-specific instructions for us
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2.1.6.2.2 Use-specific risk mitigation measures

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2.1.6.2.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.6.2.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.6.2.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.7** General directions for use of the meta SPC 1

#### **2.1.7.1** Instructions for use

- Comply with the instructions for use.
- Make sure to wet surfaces completely.
- Allow to take effect for at least 15 to 20 minutes, depending on the activity.
- Mix at a rate of 300 mL of product for 700 mL of water.
- Clean carefully the surfaces before application of the product.
- Products should not be used in conjunction with acids or ammonia.

#### **2.1.7.2** Risk mitigation measures

- For PT 2 use, avoid any direct or indirect contact with food.
- For PT 4 use, rinse surfaces after treatment.
- For mixing and loading task, professional users must wear gloves, body protection and chemical goggles.
- Washing on hands after use
- Do not touch the surface until it is totally dried
- Children should not be present during disinfection

# **2.1.7.3** Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

IF ON SKIN: Take off all contaminated clothing and wash it before reuse. Wash skin with water. If skin irritation occurs: Get medical advice.

IF IN EYES: Rinse with water. Remove contact lenses, if present and easy to do. Continue rinsing for 5 minutes. Call a POISON CENTRE or a doctor.

IF SWALLOWED: Rinse mouth. Give something to drink, if exposed person is able to swallow. Do NOT induce vomiting. Call a POISON CENTRE or a doctor.

IF INHALED: If symptoms occur call a POISON CENTRE or a doctor.

#### **2.1.7.4** Instructions for safe disposal of the product and its packaging

- Do not discharge unused product on the ground, into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste, in accordance with local regulations.

# **2.1.7.5** Conditions of storage and shelf-life of the product under normal conditions of storage

- Keep out of reach of children and non-target animals/pets.
- Do not store above 30°C
- Protect from direct sunlight
- Shelf life: 18 months

#### 2.1.8 Other information

- The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.

# PART III - THIRD INFORMATION LEVEL: INDIVIDUAL PRODUCTS IN THE META SPC 1

**2.1.9** Trade name(s), authorisation number and specific composition of each individual product

Trade name(s)	1 - Eau de javel 2.6% Nectra				
	Eau de Javel 2	Eau de Javel 2.6% Mieuxa			
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)

Trade name(s)	2 - Eau de javel 2.6% Avix				
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)

Trade name(s)	3 - Eau de javel 2.6% Onyx				
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)

Pure Sodium			7681-52-9	231-668-3	
Tractive chiofine		Active			2.73
released Irom	hypochlorite	substance			(2.6)
sodium					
hypochlorite)					

#### PART II - SECOND INFORMATION LEVEL - META SPC 2

- **2.1.10** Meta SPC 2 administrative information
- **2.1.10.1** Meta SPC identifier

Identification	META SPC 2
Tachthication	INLIA SI C Z

**2.1.10.2** Suffix to the authorisation number

**2.1.10.3** Product type(s)

Product type(s)	2
	4

- **2.1.11** Meta SPC 2 composition
- **2.1.11.1** Qualitative and quantitative information on the composition of the meta SPC 2

	IUPAC name	Function	CAS number	EC number	Conte (%)	ent
					Min	Max
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3		15.225 <i>(14.5)</i>

**2.1.11.2** Type(s) of formulation of the meta SPC 2

SL – Soluble concentrate	
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**2.1.12** Hazard and precautionary statements according to Regulation (EC) 1272/2008 of the meta SPC 2

### Classification and labelling of the products of the family according to the Regulation (EC) 1272/2008

[It should also be stated if some P statements triggered by the criteria in CLP has been excluded due to the risk assessment.]

Classification					
Hazard category	Met. Corr. 1 Skin Corr. 1 Eye Dam. 1 Aquatic acute 1 Aquatic chronic 2				
Hazard statement	H290: May be corrosive to metals H314: Causes severe skin burns H318: Causes serious eye damage H400: Very toxic to aquatic life. H411: Toxic to aquatic life with long-lasting effects.				
Labelling					
Signal words					
Hazard statements	H290: May be corrosive to metals H314: Causes severe skin burns and eye damage H410: Very toxic to aquatic life with long lasting effect.				
Precautionary statements	P234: Keep only in original packaging P260: Do not breathe dust/fume/gas/mist/vapours/spray. P264: Wash thoroughly after handling. P273: Avoid released to the environment P280: Wear protective gloves/protective clothing/eye protection/face protection. P301+P330+P331: IF SWALLOWED: rinse mouth. Do NOT induce vomiting. P303+P361+P353: IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower. P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P310: Immediately call a POISON CENTER or doctor/physician. P321: Specific treatment (see on this label). P363: Wash contaminated clothing before reuse. P390: Absorb spillage to prevent material damage P391: Collect spillage P405: Store locked up. P406: Store in a corrosion-resistant/ container with a resistant inner liner P501: Dispose of contents/container in accordance with the national regulation				
Note	EUH071: Corrosive to the respiratory tract EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine). EUH031: Contact with acids liberates toxic gas				

#### 2.1.13Authorised use(s) of the META SPC 2

#### **2.1.13.1** Use description

Table 3. Use # 1 - Disinfection of surfaces by spraying

Product Type	PT2, PT4			
Where relevant, an exact description of the authorised use	Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture) Without mechanical action			
Target organism (including development stage)	Bacteria Yeasts			
Field of use	Indoor			
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning			
Application rate(s) and frequency	Application rate: 0.525% w/w active chlorine  Contact time:  15 minutes (bacteria and yeasts)			
	Temperature: 20°C			
Category(ies) of users	Professional			
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L, 250ml 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L, 250mL: bottle, HDPE			

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,	- 1	.13	- 1		LISE:	-specific	ınstrı	ictions	tor	HSE

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2.1.13.1.2 Use-specific risk mitigation measures

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2.1.13.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.13.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.13.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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### **2.1.13.2** Use description

Table 4. Use # 2 – Disinfection of surfaces by wiping with mop/cloth

Product Type	PT2, PT4				
Where relevant, an exact description of the authorised use	Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket. Without mechanical action				
Target organism (including development stage)	Bacteria Yeasts				
Field of use	Indoor				
Application method(s)	Wiping on hard non-porous surfaces with prior cleaning				
Application rate(s) and frequency	Application rate: 0.525% w/w active chlorine				
	Contact time: • 15 minutes (bacteria and yeasts)  Temperature: 20°C				
Category(ies) of users	· ·				
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L, 250ml 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L, 250mL: bottle, HDPE				

2.1.13.2.1 Use-specific instructions for use

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2.1.13.2.2 Use-specific risk mitigation measures

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2.1.13.2.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.13.2.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.13.2.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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**2.1.14** General directions for use of the meta SPC 2

#### **2.1.14.1** Instructions for use

- Comply with the instructions for use.
- Make sure to wet surfaces completely.
- Allow to take effect for at least 15 minutes.
- Clean carefully the surfaces before application of the product.
- Products should not be used in conjunction with acids or ammonia.

#### **2.1.14.2** Risk mitigation measures

- For PT 2 use, avoid any direct or indirect contact with food.
- For PT 4 use, rinse surfaces after treatment.
- For mixing and loading task, professional users must wear gloves, body protection and chemical goggles.
- Do not touch the surface until it is totally dried
- Children should not be present during disinfection

# **2.1.14.3** Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- IF ON SKIN: Immediately wash skin with plenty of water. Thereafter take off all contaminated clothing and wash it before reuse. Continue to wash the skin with water for 15 minutes. Call a POISON CENTRE or a doctor.

IF IN EYES: Immediately rinse with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing for at least 15 minutes. Call 112/ambulance for medical assistance.

<u>Information to Healthcare personnel/doctor:</u> The eyes should also be rinsed repeatedly on the way to the doctor if eye exposure to alkaline chemicals (pH > 11), amines and acids like acetic acid, formic acid or propionic acid

IF INHALED: Move to fresh air and keep at rest in a position comfortable for breathing. If symptoms: Call 112/ambulance for medical assistance. If no symptoms: Call a POISON CENTRE or a doctor.

IF SWALLOWED: Immediately rinse mouth. Give something to drink, if exposed person is able to swallow. Do NOT induce vomiting. Call 112/ambulance for medical assistance.

#### **2.1.14.4** Instructions for safe disposal of the product and its packaging

- Do not discharge unused product on the ground, into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste, in accordance with local regulations.

# **2.1.14.5** Conditions of storage and shelf-life of the product under normal conditions of storage

- Keep out of reach of children and non-target animals/pets.
- Do not store above 30°C
- Protect from direct sunlight
- Shelf life: 3 months

#### **2.1.15** Other information

- The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.

# PART III - THIRD INFORMATION LEVEL: INDIVIDUAL PRODUCTS IN THE META SPC 2

**2.1.16** Trade name(s), authorisation number and specific composition of each individual product

	6 - Concentré de javel 9.6%							
Tuesda manus (a)	Concentré de javel 9.6% Nectra							
Trade name(s)	Eau de javel con	centrée à	9.6% Mieu	xa				
	Extrait de javel 9.6% Novopure							
Authorisation number								
Common name	IUPAC name	Function	CAS number	EC number	Content (%)			
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	10.08 (9.6)			

Trade name(s)	7 - Extrait de ja	vel 12.5%					
	Extrait de javel	Extrait de javel 12.5 % Nectra					
Authorisation number							
Common name	IUPAC name	Function	CAS number	EC number	Content (%)		
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	13.125 (12.5)		

Trade name(s)	7bis - Extrait de javel 13-16%						
	Extrait de javel 13-16% Nectra						
Authorisation number							
Common name	IUPAC name	Function	CAS number	EC number	Content (%)		
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	15.225 (14.5)		

### **PART II - SECOND INFORMATION LEVEL - META SPC 3**

#### **2.1.17** Meta SPC 3 administrative information

#### **2.1.17.1** Meta SPC identifier

Identification	Meta SPC 3
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#### **2.1.17.2** Suffix to the authorisation number

### **2.1.17.3** Product type(s)

Product type(s)	2
	4

#### **2.1.18** Meta SPC 3 composition

### **2.1.18.1** Qualitative and quantitative information on the composition of the meta SPC 3

Common name	IUPAC name	Function	CAS number	EC number	Content (%)	
					Min	Max
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	1.575 (1.5)	1.575 (1.5)

#### **2.1.18.2** Type(s) of formulation of the meta SPC 3

AL - Any other liquid

**2.1.19** Hazard and precautionary statements according to Regulation (EC) 1272/2008 of the meta SPC 3

### Classification and labelling of the products of the family according to the Regulation (EC) 1272/2008

[It should also be stated if some P statements triggered by the criteria in CLP has been excluded due to the risk assessment.]

Classification	
Hazard category	Met. Corr. 1 Skin Irri. 2
	Eye Irri. 2
	Aquatic chronic 3
Unanud statement	·
Hazard statement	H290: May be corrosive to metals
	H315: Causes skin irritation
	H319: Causes serious eye irritation
	H412: Harmful to aquatic life with long-lasting effects.
Labelling	
Signal words	Warning
Hazard statements	H290: May be corrosive to metals
	H315: Causes skin irritation
	H319: Causes serious eye irritation
	H412: Harmful to aquatic life with long-lasting effects.

Classification	
Precautionary statements	P234: Keep only in original packaging P264: Wash thoroughly after handling. P273: Avoid released to the environment P280: Wear protective gloves/protective clothing/eye protection/face protection. P302+P352: IF ON SKIN: Wash with plenty of soap and water. P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P321: Specific treatment (see on this label). P332+P313: If skin irritation occurs: Get medical advice/attention. P337+P313: If eye irritation persists: Get medical advice/attention. P362+P364: Take off contaminated clothing and wash before reuse. P390: Absorb spillage to prevent material damage P406: Store in a corrosion-resistant/ container with a resistant inner liner P501: Dispose of contents/container in accordance with the
	national regulation
Note	EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine). The precausionnary statement P280 does not apply to non-professionnal users.

### 2.1.20 Authorised use(s) of the META SPC 3

### **2.1.20.1** Use description

Table 5. Use # 1 – Disinfection of surfaces by spraying

Product Type	PT2, PT4
Where relevant, an exact description of the authorised use	Disinfection of hard surfaces by spraying (ustensils, equipment, furniture) Without mechanical action
Target organism (including development stage)	Bacteria Yeasts Fungi
Field of use	Indoor
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning
Application rate(s) and frequency	Ready-to-use Spray directly on the surface  Contact time:  15 minutes (bacteria and yeasts) 20 minutes (fungi)
	Temperature: 20°C

Category(ies) of users	Professional Non-professional
Pack sizes and packaging material	800mL: spray bottle PEDH (HDPE spray + Viton seal)

2.1.20.1.1 Use-specific instructions for use

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2.1.20.1.2 Use-specific risk mitigation measures

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2.1.20.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.20.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.20.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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**2.1.21** General directions for use of the meta SPC 3

#### **2.1.21.1** Instructions for use

- Comply with the instructions for use.
- Make sure to wet surfaces completely.
- Allow to take effect for at least 15 to 20 minutes, depending on the activity.
- Clean carefully the surfaces before application of the product.
- Products should not be used in conjunction with acids or ammonia.

#### **2.1.21.2** Risk mitigation measures

- For PT 2 use, avoid any direct or indirect contact with food.
- For PT 4 use, rinse surfaces after treatment.
- For application by spraying and post-application task, professional users must wear gloves, body protection and chemical goggles.
- Washing on hands after use
- The product has to be sprayed downward
- Do not touch the surface until it is totally dried
- Children should not be present during disinfection
- **2.1.21.3** Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

IF ON SKIN: Take off all contaminated clothing and wash it before reuse. Wash skin

with water. If skin irritation occurs: Get medical advice.

IF IN EYES: Rinse with water. Remove contact lenses, if present and easy to do.

Continue rinsing for 5 minutes. Call a POISON CENTRE or a doctor.

IF SWALLOWED: Rinse mouth. Give something to drink, if exposed person is able to

swallow. Do NOT induce vomiting. Call a POISON CENTRE or a doctor. IF INHALED: If symptoms occur call a POISON CENTRE or a doctor.

#### **2.1.21.4** Instructions for safe disposal of the product and its packaging

- Do not discharge unused product on the ground, into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste, in accordance with local regulations.

## **2.1.21.5** Conditions of storage and shelf-life of the product under normal conditions of storage

- Keep out of reach of children and non-target animals/pets.
- Do not store above 30°C
- Protect from direct sunlight
- Shelf life: 24 months

#### **2.1.22** Other information

- The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.

# PART III - THIRD INFORMATION LEVEL: INDIVIDUAL PRODUCTS IN THE META SPC 3

## **2.1.23** Trade name(s), authorisation number and specific composition of each individual product

Trade name(s)	8 - Spray javel 1.5%				
	Spray javel 1.5	Spray javel 1.5% Nectra			
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	1.575 (1.5)

Trade name(s)	9 - Javel blanchiment anti-verdissures				
	Javel blanchim	Javel blanchiment anti-verdissures Mieuxa			
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	1.575 (1.5)

### PART II - SECOND INFORMATION LEVEL - META SPC 5

- **2.1.24** Meta SPC 5 administrative information
- **2.1.24.1** Meta SPC identifier

Identification	Meta SPC 5
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**2.1.24.2** Suffix to the authorisation number

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**2.1.24.3** Product type(s)

Product type(s)	2
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- **2.1.25** Meta SPC 5 composition
- **2.1.25.1** Qualitative and quantitative information on the composition of the meta SPC 5

	IUPAC name		CAS number	EC number	Conte (%)	ent
					Min	Max
Pure Sodium hypochlorite	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	5.145 <i>(4.9)</i>	5.145 (4.9)

	IUPAC name	CAS number	EC number	Conte (%)	ent
				Min	Max
(Active chlorine					
released from sodium					
hypochlorite)					

### **2.1.25.2** Type(s) of formulation of the meta SPC 5

CI	<ul> <li>Soluble concentrate</li> </ul>		
121 .	- Soluble Concentrate		
	Dolabic collecticate		

**2.1.26** Hazard and precautionary statements according to Regulation (EC) 1272/2008 of the meta SPC 5

## Classification and labelling of the products of the family according to the Regulation (EC) 1272/2008

[It should also be stated if some P statements triggered by the criteria in CLP has been excluded due to the risk assessment.]

Classification	
Hazard category	Met. Corr. 1
	Skin Corr. 1
	Eye Dam. 1
	Aquatic acute 1
	Aquatic chronic 2
Hazard statement	H290: May be corrosive to metals
	H314: Causes severe skin burns
	H318: Causes serious eye damage
	H400: Very toxic to aquatic life.
	H411: Toxic to aquatic life with long-lasting effects.
Labelling	
Signal words	
Hazard statements	H290: May be corrosive to metals
	H314: Causes severe skin burns and eye damage
	H410: Very toxic to aquatic life with long lasting effect.

Classification	
Precautionary	P234: Keep only in original packaging
statements	P260: Do not breathe dust/fume/gas/mist/vapours/spray.
	P264: Wash thoroughly after handling.
	P273: Avoid released to the environment
	P280: Wear protective gloves/protective clothing/eye protection/face protection.
	P301+P330+P331: IF SWALLOWED: rinse mouth. Do NOT
	induce vomiting.
	P303+P361+P353: IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with
	water/shower.
	P304+P340: IF INHALED: Remove victim to fresh air and
	keep at rest in a position comfortable for breathing. P305+P351+P338: IF IN EYES: Rinse cautiously with water
	· ·
	for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
	P310: Immediately call a POISON CENTER or
	doctor/physician.
	P321: Specific treatment (see on this label).
	P363: Wash contaminated clothing before reuse.
	P390: Absorb spillage to prevent material damage
	P391: Collect spillage
	P405: Store locked up.
	P406: Store in a corrosion-resistant/ container with a
	resistant inner liner
	P501: Dispose of contents/container in accordance with the
	national regulation
Note	EUH071: Corrosive for the respiratory tract.
	EUH206: Warning! Do not use together with other products.
	May release dangerous gases (chlorine).
	EUH031: Contact with acids liberates toxic gas

## 2.1.27 Authorised use(s) of the META SPC 5

## **2.1.27.1** Use description

Table 6. Use # 1 – Disinfection of surfaces by spraying

<b>Product Type</b>	PT2, PT4
Where relevant, an exact description of the authorised use	Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture) Without mechanical action
Target organism (including development stage)	Bacteria Yeasts
Field of use	Indoor
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning
Application rate(s) and frequency	Application rate: dilution of 15 % v/v in water prior spraying Contact time:
	Contact time.

	15 minutes (bacteria and yeasts)
	Temperature: 20°C
Category(ies) of users	Professional
Pack sizes and packaging material	Pack sizes: 20L,10L, 5L HDPE bottle

2.1.27.1.1 Use-specific instructions for use

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- 2.1.27.1.2 Use-specific risk mitigation measures
  - For application by spraying, professional users must wear gloves, body protection, chemical goggles and respiratory protective equipment.
- 2.1.27.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.27.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.27.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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### **2.1.27.2** Use description

Table 7. Use #2 – Disinfection of surfaces by wiping with mop/cloth

Product Type	PT2, PT4		
Where relevant, an exact description of the authorised use	Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket. Without mechanical action		
Target organism (including development stage)	Bacteria Yeasts		
Field of use	Indoor		
Application method(s)	Wiping on hard non-porous surfaces with prior cleaning		
Application rate(s) and frequency	Application rate: dilution of 15 % v/v in water prior wiping  Contact time:  • 15 minutes (bacteria and yeasts)  Temperature: 20°C		
Category(ies) of users			
Pack sizes and packaging material	Pack sizes: 20L,10L, 5L HDPE can		

2.1.27.2.1 Use-specific instructions for use

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- 2.1.27.2.2 Use-specific risk mitigation measures
  - For application by mopping or wiping, professional users must wear gloves, body protection and chemical goggles.
  - Do not dip your hands in the bucket.
  - Apply the product only with a mop with a handle.
- 2.1.27.2.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.27.2.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.27.2.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.28** General directions for use of the meta SPC 5

#### **2.1.28.1** Instructions for use

- Comply with the instructions for use.
- Make sure to wet surfaces completely. Allow to take effect for at least 15 minutes
- Mix at a rate of 150 mL of product for 850 mL of water.
- Clean carefully the surfaces before application of the product.
- Products should not be used in conjunction with acids or ammonia.

#### **2.1.28.2** Risk mitigation measures

- For PT 2 use, avoid any direct or indirect contact with food.
- For PT 4 use, rinse surfaces after treatment.
- For mixing and loading and post-application task, professional users must wear gloves, body protection and chemical goggles.
- Do not touch the surface until it is totally dried
- Children should not be present during disinfection

## **2.1.28.3** Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

IF ON SKIN: Immediately wash skin with plenty of water. Thereafter take off all contaminated clothing and wash it before reuse. Continue to wash the skin with water for 15 minutes. Call a POISON CENTRE or a doctor.

IF IN EYES: Immediately rinse with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing for at least 15 minutes. Call 112/ambulance for medical assistance.

<u>Information to Healthcare personnel/doctor:</u> The eyes should also be rinsed repeatedly on the way to the doctor if eye exposure to alkaline chemicals (pH > 11), amines and acids like acetic acid, formic acid or propionic acid

IF INHALED: Move to fresh air and keep at rest in a position comfortable for breathing. If symptoms: Call 112/ambulance for medical assistance. If no symptoms: Call a POISON CENTRE or a doctor.

IF SWALLOWED: Immediately rinse mouth. Give something to drink, if exposed person is able to swallow. Do NOT induce vomiting. Call 112/ambulance for medical assistance.

#### **2.1.28.4** Instructions for safe disposal of the product and its packaging

- Do not discharge unused product on the ground, into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste, in accordance with local regulations.

## **2.1.28.5** Conditions of storage and shelf-life of the product under normal conditions of storage

- Keep out of reach of children and non-target animals/pets.
- Do not store above 30°C
- Protect from direct sunlight
- Shelf life: 8 months

#### **2.1.29** Other information

- The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.
- Products are foaming formulations

# PART III - THIRD INFORMATION LEVEL: INDIVIDUAL PRODUCTS IN THE META SPC 5

**2.1.30** Trade name(s), authorisation number and specific composition of each individual product

Trade name(s)	19 - Al'k Chlore Essentiel				
	Al'k Chlore Ess	Al'k Chlore Essentiel Nectra			
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	5.145 (4.9)

Trade name(s)	20 - Perfo Alka mousse				
	Perfo Alka mous	Perfo Alka mousse Hygial			
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	5.145 (4.9)

### PART II - SECOND INFORMATION LEVEL - META SPC 8

#### **2.1.31** Meta SPC 8 administrative information

#### **2.1.31.1** Meta SPC identifier

Identification	META SPC 8
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#### **2.1.31.2** Suffix to the authorisation number

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### **2.1.31.3** Product type(s)

Product type(s)	2
	4

#### **2.1.32** Meta SPC 8 composition

## **2.1.32.1** Qualitative and quantitative information on the composition of the meta SPC 8

Common name	IUPAC name	Function	CAS number	EC number	Content (%)	
					Min	Max
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)	2.73 (2.6)
Dodecanenitrile	-	Surfactant	2437-25-4	219-440-1	0	0.05

#### **2.1.32.2** Type(s) of formulation of the meta SPC 8

SL – Soluble concentrate

**2.1.33** Hazard and precautionary statements according to Regulation (EC) 1272/2008 of the meta SPC 8

## Classification and labelling of the products of the family according to the Regulation (EC) 1272/2008

[It should also be stated if some P statements triggered by the criteria in CLP has been excluded due to the risk assessment.]

Classification		
Hazard category	Met. Corr. 1	
	Skin Corr. 1	
	Eye Dam. 1	
	Aquatic acute 1	
	Aquatic chronic 2	

Classification	
Hazard statement	H290: May be corrosive to metals H314: Causes severe skin burns H318: Causes serious eye damage H400: Very toxic to aquatic life. H411: Toxic to aquatic life with long-lasting effects.
Labelling	
Signal words	
Hazard statements	H290: May be corrosive to metals H314: Causes severe skin burns and eye damage H410: Very toxic to aquatic life with long lasting effect.
Precautionary statements	P234: Keep only in original packaging P260: Do not breathe dust/fume/gas/mist/vapours/spray. P264: Wash thoroughly after handling. P273: Avoid released to the environment P280: Wear protective gloves/protective clothing/eye protection/face protection. P301+P330+P331: IF SWALLOWED: rinse mouth. Do NOT induce vomiting. P303+P361+P353: IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower. P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P310: Immediately call a POISON CENTER or doctor/physician. P321: Specific treatment (see on this label). P363: Wash contaminated clothing before reuse. P390: Absorb spillage to prevent material damage P391: Collect spillage P405: Store locked up. P406: Store in a corrosion-resistant/ container with a resistant inner liner P501: Dispose of contents/container in accordance with the national regulation
Note	EUH071: Corrosive for the respiratory tract. EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine).

## 2.1.34 Authorised use(s) of the META SPC 8

## **2.1.34.1** Use description

Table 8. Use # 1 – Disinfection of surfaces by spraying

PT2

Where relevant, an exact description of the authorised use	Disinfection of hard surfaces by spraying (ustensils, equipment, furniture) Without mechanical action		
Target organism (including development stage)	Bacteria Yeasts Fungi		
Field of use	Indoor		
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning		
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts)  20 minutes (fungi)  Temperature: 20°C		
Category(ies) of users	Professional		
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE		

2.1.34.1.1 Use-specific instructions for use

2.1.34.1.2 Use-specific risk mitigation measures

- For application by spraying, professional users must wear gloves, body protection, chemical goggles and respiratory protective equipment.
- 2.1.34.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.34.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.34.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.34.2** Use description

Table 9. Use # 2 - Disinfection of surfaces by wiping with mop/cloth

Product Type	PT2	
Where relevant, an exact description of the authorised use	Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket. Without mechanical action	
Target organism (including development stage)	Bacteria Yeasts Fungi	
Field of use	Indoor	
Application method(s)	Wiping on hard non-porous surfaces with prior cleaning	
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts)  20 minutes (fungi)  Temperature: 20°C	
Category(ies) of users	Professional	
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE	

#### 2.1.34.2.1 Use-specific instructions for use

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#### 2.1.34.2.2 Use-specific risk mitigation measures

- For application by mopping or wiping, professional users must wear gloves, body protection and chemical goggles.
- Do not dip your hands in the bucket.
- Apply the product only with a mop with a handle.
- 2.1.34.2.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.34.2.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.34.2.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.34.3** Use description

Table 10. Use # 3 – Disinfection of domestic surfaces by spraying

Product Type	PT 4			
Where relevant, an exact description of the authorised use	Disinfection of hard surfaces in domestic areas by spraying (ustensils, equipment, furniture) Without mechanical action			
Target organism (including development stage)	Bacteria Yeasts Fungi			
Field of use	Indoor			
Application method(s)	Spraying on hard non-porous surfaces with prior cleaning			
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts)  20 minutes (fungi)  Temperature: 20°C			
Category(ies) of users	Professional			
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE			

#### 2.1.34.3.1 Use-specific instructions for use

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#### 2.1.34.3.2 Use-specific risk mitigation measures

- For application by spraying, professional users must wear gloves, body protection, chemical goggles and respiratory protective equipment.
- 2.1.34.3.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

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2.1.34.3.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.34.3.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.34.4** Use description

Table 11. Use # 2 - Disinfection of domestic surfaces by wiping with mop/cloth

Product Type	PT4			
Where relevant, an exact description of the authorised use	Disinfection of surfaces in domestic areas (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket. Without mechanical action			
Target organism (including development stage)	Bacteria Yeasts Fungi			
Field of use	Indoor			
Application method(s)	Wiping on hard non-porous surfaces with prior cleaning			
Application rate(s) and frequency	Application rate: 30 % v/v dilution in water  Contact time:  15 minutes (bacteria and yeasts) 20 minutes (fungi)  Temperature: 20°C			
Category(ies) of users	Professional			
Pack sizes and packaging material	Pack sizes: 1000L, 20L, 10L, 5L, 2L, 1L 1000L: tank, High density polyethylene (HDPE) 20L, 10L, 5L: can, HDPE 2L, 1L: bottle, HDPE			

#### 2.1.34.4.1 Use-specific instructions for use

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#### 2.1.34.4.2 Use-specific risk mitigation measures

- For application by mopping or wiping, professional users must wear gloves, body protection and chemical goggles.
- Do not dip your hands in the bucket.
- Apply the product only with a mop with a handle.
- 2.1.34.4.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

2.1.34.4.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

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2.1.34.4.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

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#### **2.1.35** General directions for use of the meta SPC 8

#### **2.1.35.1** Instructions for use

- Comply with the instructions for use.
- Make sure to wet surfaces completely.
- Allow to take effect for at least 15 to 20 minutes, depending on the activity.
- Clean carefully the surfaces before application of the product.
- Mix at a rate of 300 mL of product for 700 mL of water.
- Products should not be used in conjunction with acids or ammonia.

#### **2.1.35.2** Risk mitigation measures

- For PT 4 use ,the disinfection of hard surfaces in contact with food is restricted to domestic areas
- For PT 2 use, avoid any direct or indirect contact with food.
- For PT 4 use, rinse surfaces after treatment.
- For mixing and loading and post-application task, professional users must wear gloves, body protection and chemical goggles.
- Do not touch the surface until it is totally dried
- Children should not be present during disinfection

## **2.1.35.3** Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

IF ON SKIN: Immediately wash skin with plenty of water. Thereafter take off all contaminated clothing and wash it before reuse. Continue to wash the skin with water for 15 minutes. Call a POISON CENTRE or a doctor.

IF IN EYES: Immediately rinse with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing for at least 15 minutes. Call 112/ambulance for medical assistance.

<u>Information to Healthcare personnel/doctor:</u> The eyes should also be rinsed repeatedly on the way to the doctor if eye exposure to alkaline chemicals (pH > 11), amines and acids like acetic acid, formic acid or propionic acid

IF INHALED: Move to fresh air and keep at rest in a position comfortable for breathing. If symptoms: Call 112/ambulance for medical assistance. If no symptoms: Call a POISON CENTRE or a doctor.

IF SWALLOWED: Immediately rinse mouth. Give something to drink, if exposed person is able to swallow. Do NOT induce vomiting. Call 112/ambulance for medical assistance.

### **2.1.35.4** Instructions for safe disposal of the product and its packaging

- Do not discharge unused product on the ground, into water courses, into pipes (sink, toilets...) nor down the drains.
- Dispose of unused product, its packaging and all other waste, in accordance with local regulations.

## **2.1.35.5** Conditions of storage and shelf-life of the product under normal conditions of storage

- Keep out of reach of children and non-target animals/pets.
- Do not store above 30°C
- Protect from direct sunlight
- Shelf life: 18 months

#### **2.1.36** Other information

- The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.
- Products are foaming formulations

# PART III - THIRD INFORMATION LEVEL: INDIVIDUAL PRODUCTS IN THE META SPC 8

## **2.1.37** Trade name(s), authorisation number and specific composition of each individual product

Trade name(s)	12 - Eau de javel 2.6% détergente citron Eau de javel 2.6% détergente citron Nectra							
	Eau de javel 2.	Eau de javel 2.6% détergente citron Mieuxa						
Authorisation number								
Common name	IUPAC name	Function	CAS number	EC number	Content (%)			
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)			
Dodecanenitrile	-	Surfactant	2437-25-4	219-440-1	0.05			
Trade name(s)	13 - Eau de javel 2.6% détergente eucalyptus Eau de javel 2.6% détergente eucalyptus Nectra							

	Eau de javel 2.6% détergente eucalyptus Mieuxa Flash White IPC Nettoyant moissures IT2C				
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)

Trade name(s)	14 - Eau de javel 2.6% fraicheur citron						
		Eau de javel 2.6% fraicheur citron Nectra					
	Eau de javel 2.6	% fraiche	ur citron Mi	euxa			
Authorisation number							
Common name	IUPAC name	Function	CAS number	EC number	Content (%)		
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)		
Dodecanenitrile	-	Surfactant	2437-25-4	219-440-1	0.05		

Trade name(s)	15 - Eau de javel 2.6% fraicheur eucalyptus Eau de javel 2.6% fraicheur eucalyptus Nectra Eau de javel 2.6% fraicheur eucalyptus Mieuxa Eau de javel 2.6% fraicheur eucalyptus Onyx				
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)

Trade name(s)	17 - Eau de javel 2.6% détergente
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	Eau de javel 2.6% détergente Nectra				
Authorisation number					
Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Pure Sodium hypochlorite (Active chlorine released from sodium hypochlorite)	Sodium hypochlorite	Active substance	7681-52-9	231-668-3	2.73 (2.6)

### 2.1.38 Packaging of the biocidal product

Type of packaging	Size/volume of the packaging	Material of the packaging	Type and material of closure(s)	Intended user (e.g. professional, non- professional)	Compatibility of the product with the proposed packaging materials (Yes/No)
Container (Meta SPC 1, 2 and 8)	1000L	HDPE		Professional	Yes
Can/tin (Meta SPC 1, 2, 5 and 8)	20L, 10L	HDPE		Professional, non- professional	Yes
Bottle (Meta SPC 1, 2 and 8)	2L, 1L	HDPE		Professional, non- professional	Yes
Bottle (Meta SPC 2)	250 mL	HDPE		Professional, non- professional	Yes
Spray bottle (Meta SPC 3)	800mL	HDPE	HDPE spray system (TS5 Guala) + Viton seal	Professional, non- professional	Yes

#### 2.1.39 Documentation

#### **2.1.39.1** Data submitted in relation to product application

New studies have been submitted for physico-chemical properties and analytical methods. New data with the product family have been submitted for the demonstration of the efficacy. Please refer to the list of references

#### **2.1.39.2** Access to documentation

A letter of access to the data of the CAR of sodium hypochlorite has been submitted by Euro Chlor (owners of studies on sodium hypochlite for PTs 1, 2, 3, 4, 5, 11 and 12) and allows ARDEA SA, COLDIS, Comptoir Produits Chimiques Entretien and Notilia Group to refer to active substance data.

### 2.2 Assessment of the biocidal product family

### 2.2.1 Intended use(s) as applied for by the applicant

#### Use # 1 - Disinfection of surfaces by spraying (Meta SPC 1, 2, 3, 5, 8)

Table 1. Use # 1 - Disinfection of surfaces by spraying

able 1. Use # 1 - Disinfection of surfaces by spraying				
Product Type	PT2, PT4			
Where relevant, an exact description of the authorised use	Disinfection of surfaces by spraying: hard surface (utensils, equipment, furniture)			
Target organism (including development stage)	Bacteria, yeast, fungi			
Field of use	Indoor			
Application method(s)	Spraying On hard non-porous surfaces with or without prior cleaning, at +20°C during 5 min: Thoroughly rinse the surfaces after disinfection.  The product applied by spraying is			
Application rate(s) and frequency	Final concentration of active substance on surfaces is 4.1 g/l NaOCl (3900 ppm of active available chlorine). Apply at an adequate frequency based on the hygiene plan in place.			
Category(ies) of users	Professional Non-professional			
Pack sizes and packaging material	Please see the relevant section.			

## Use # 2 - Disinfection of surfaces (floors) by wiping with mop/cloth and bucket (Meta SPC 1, 2, 5, 8)

Table 2. Use # 2 - Disinfection of surfaces by wiping with mop/cloth and bucket

	T
Product Type	PT2, PT4
Where relevant, an exact description of the authorised use	Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket
Target organism (including development stage)	Bacteria, yeast, fungi
Field of use	Indoor
Application method(s)	Wiping On hard non-porous surfaces with or without prior cleaning, at +20°C during 5 min: Thoroughly rinse the surfaces after disinfection.

	The product applied by wiping is a soluble concentrate (SL) to be diluted in drinking water. (see use-specific instruction for use)
Application rate(s) and frequency	Final concentration of active substance on surfaces is 4.1 g/l NaOCl (3900 ppm of active available chlorine). Apply at an adequate frequency based on the hygiene plan in place.
Category(ies) of users	Professional Non-professional
Pack sizes and packaging material	Please see the relevant section.

#### 2.2.2 Physical, chemical and technical properties

Physicochemical studies have been undertaken on representative formulations of the family. Those studies are performed on:

- The formulation of Meta SPC 1.
- Three formulations of Meta SPC 2, covering its range of active substance concentrations.
- The formulation of Meta SPC 3.
- The formulation of Meta SPC 5.
- A worst-case formulation of Meta SPC 8 (product sodium hychlorite 2.6% + 5% perfumed detergent). This covers all the product of the Meta SPC 8 as they have the same active substance concentration.

The studies cover the dermination of the relevant physicochemical properties of the test items, as well as their stability when stored at ambient temperature.

Some stability studies are still ongoing. Intermediate results of the stability assessment are available.

All available results are described in the table below.

Dilution of products in authorised uses:

- Meta SPC 1: 30% v/v
- Meta SPC 2: 5% 7.5% v/v (depending on the content of active substance in the product)
- Meta SPC 3: Ready-to-use products (Sprays)
- Meta SPC 5: 15% v/v
- Meta SPC 8: 30% v/v

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
Physical state at 20 °C and 101.3 kPa	Sensory observation	Meta SPC 1 (2.73% sodium hypochlorite)	Liquid	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	Sensory observation	Meta SPC 2 (10.08% sodium hypochlorite)	Liquid	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	Sensory observation	Meta SPC 2 (13.125% sodium hypochlorite)	Liquid	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	Sensory observation	Meta SPC 2 (15.225% sodium hypochlorite)	Liquid	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	Sensory observation	Meta SPC 3 (1.575% sodium hypochlorite)	Liquid	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
	Sensory observation	Meta SPC 5 (5.145% sodium hypochlorite)	Liquid	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	Sensory observation	Meta SPC 8 (2.73% sodium hypochlorite)	Liquid	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable
olour at 20 °C and 01.3 kPa	Sensory observation	Meta SPC 1 (2.73% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	Sensory observation	Meta SPC 2 (10.08% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	Sensory observation	Meta SPC 2 (13.125% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2021, report	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
				20-30-047- ES Part 1	
	Sensory observation	Meta SPC 2 (15.225% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	Sensory observation	Meta SPC 3 (1.575% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
	Sensory observation	Meta SPC 5 (5.145% sodium hypochlorite)	Light yellow, translucent	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	Sensory observation	Meta SPC 8 (2.73% sodium hypochlorite)	Colourless, translucent	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable
Odour at 20 °C and 101.3 kPa	Sensory observation	Meta SPC 1 (2.73% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 2 (10.08% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 2 (13.125% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 2 (15.225% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 3 (1.575% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 5 (5.145% sodium hypochlorite)	Characteristic chlorinated odour	Applicant data	Acceptable
	Sensory observation	Meta SPC 8 (2.73% sodium hypochlorite)	Characteristic chlorinated odour or perfumed odour (lemon or eucalyptus) depending on the presence or absence of perfume and on its nature	Applicant data	Acceptable
Acidity / alkalinity	pH: CIPAC MT 75.3	Meta SPC 1 (2.73% sodium hypochlorite)	pH = 12.2 (neat product) pH = 10.3 (1% w/v dilution)  Alkalinity = 0.12% w/w (as NaOH) (neat product)	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
	Alkalinity: CIPAC MT 191				
	pH: CIPAC MT 75.3 Alkalinity: CIPAC MT 191	Meta SPC 2 (10.08% sodium hypochlorite)	pH = 12.8 (neat product) pH = 10.9 (1% w/v dilution) Alkalinity = 0.38% w/w (as NaOH) (neat product)	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	pH: CIPAC MT 75.3 Alkalinity: CIPAC MT 191	Meta SPC 2 (13.125% sodium hypochlorite)	pH = 12.9 (neat product) pH = 11.0 (1% w/v dilution)  Alkalinity = 0.38% w/w (as NaOH) (neat product)	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	pH: CIPAC MT 75.3 Alkalinity: CIPAC MT 191	Meta SPC 2 (15.225% sodium hypochlorite)	pH = 13.0 (neat product) pH = 11.0 (1% w/v dilution) Alkalinity = 0.42% w/w (as NaOH) (neat product)	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	pH: CIPAC MT 75.3 Alkalinity: CIPAC MT 191	Meta SPC 3 (1.575% sodium hypochlorite)	pH = 12.0 (neat product) pH = 10.1 (1% w/v dilution)  Alkalinity = 0.07% w/w (as NaOH) (neat product)	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
	pH: CIPAC MT 75.3 Alkalinity: CIPAC MT	Meta SPC 5 (5.145% sodium hypochlorite)	pH = 12.4 (neat product) pH = 11.6 (1% w/v dilution) Alkalinity = 0.20% w/w (as NaOH) (neat product)	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	pH: CIPAC MT 75.3	Meta SPC 8 (2.73% sodium hypochlorite)	pH = 12.2 (neat product) pH = 11.4 (1% w/v dilution)  Alkalinity = 0.11% w/w (as NaOH) (neat product)	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
	Alkalinity: CIPAC MT 191				
Relative density / bulk density	OECD 109	Meta SPC 1 (2.73% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.052 (20°C)	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	OECD 109	Meta SPC 2 (10.08% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.18 (20°C)	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	OECD 109	Meta SPC 2 (13.125% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.218 (20°C)	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	OECD 109	Meta SPC 2 (15.225% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.242 (20°C)	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	OECD 109	Meta SPC 3 (1.575% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.028 (20°C)	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
	OECD 109	Meta SPC 5 (5.145% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.091 (20°C)	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	OECD 109	Meta SPC 8 (2.73% sodium hypochlorite)	D <sup>20</sup> <sub>4</sub> =1.051 (20°C)	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable
Storage stability test – accelerated storage	CIPAC method MT46.3  Active chlorine method:	0.98% active chlorine Product Javel 0.8% detergente citron – Meta SPC 4 (abandoned)	The test item was stored in glass flasks of 100mL during 14 days at 54°C.	Study report RRCo- 000375_01	Not acceptable  The degradation of the active content is > 10%.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment		
	ANA_MON_1 02		Parameter	Initial	14 days at 54°C		The biocidal product is not
	Sodium chlorate method:		Appearance	•	with a typical odour		stable after accelerated
	ANA_MON_1		Weight change	-	No variation		storage. The product
	03		Active chlorine (%w/w)	0.98	< LOQ* (100.0 % of decrease)		should not be stored above 30°C.
			Sodium chlorate content (%w/w)	0.03	0.13		
			Sodium chlorate/available chlorine (%)	3	-		
			рН	10	7.8		
			alkalinity (%w/w as NaOH)	0.4	0.0		
			Dilution stability (at 5% dilution and after 18h)	No separated material.	No separated material.		
			Persistent foaming (mL) (at 100%)	After 10s: 133 After 1min: 124 After 3min: 123 After 12 min: 122	No persistent foam		
			* LOQ : Limit of quantification	tion i.e. 0.0003%.			
Storage stability test – accelerated storage	CIPAC method MT46.3	12.78% active chlorine Product Javel 13-16% - Meta SPC 2	The test item was stored i 54°C.	n glass flasks of 10	OmL during 14 days a	t Study report RRCo- 000377_01	Not acceptable  The degradation of the active content is > 10%.  The biocidal product is not

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results			Reference	eCA assessment	
			Parameter	Initial	14 days at 54°C		stable after	
			Appearance	Yellow liquid with a typical odour of bleach	Colourless liquid with a typical odour of bleach		accelerated storage. The product should not be	
			Weight change	-	No variation		stored above	
			Active chlorine (%w/w)	12.78	2.01 (84.2% of decrease)		30°C.  It should also be noted that the chlorate content is higher than	
			Sodium chlorate content (%w/w)	2.57	7.43			
			Sodium chlorate/available chlorine (%)	20%	369%		the maximum content set in the regulation	
			рН	11.2	11.2		(sodium chlorate: ≤5.4%	
			alkalinity (%w/w as NaOH)	4.9	1.4		of available chlorine) before	
			Dilution stability (at 5% dilution and after 18h)	Presence of particles in the bottom of the flask and supernatant particles	Presence of white cloud in the bottom of the flask and supernatant particles.		and after storage. Please refer to human health section regarding conclusion on chlorate content.	
			Persistent foaming (mL) (at 100%)	No persistent foam	No persistent foam			
Storage stability test – long term storage at ambient temperature	GIFAP monograph no.17 Active	Meta SPC 1 (2.73% sodium hypochlorite)	Ongoing study (24 months Intermediate results up to The test item was stored in from light.	E. Servajean, 2021, report 20-30-009- ES Interim	The degradation of the active content is >10% after 6 and 9 months of			
	chlorine: See section 2.2.5		RESULTS UPON F	RECEIPT AFTER 6 M	ONTHS AFTER 9 MONTHS		storage.	

Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	eCA assessment		
Chlorate: See section 2.2.5		Active chlorine	26.7 g/kg	22.3 g/kg (83.5% of initial)	23.2 g/kg (86.9% of initial)		the product could be considered stable after 9
Appearance and		Chlorate	0.86 g/kg	1.35 g/kg (156.6% of initial)	1.39 g/kg (161.4% of initial)		months at ambient temperature,
visual		Sodium Chlorate	1.1 g/kg	1.7 g/kg	1.8 g/kg		providing that efficacy tests are acceptable.  Moreover, chlorate content is higher than the maximum content set in the regulation (sodium chlorate: ≤5.4%
pH: CIPAC MT 75.3		Sodium chlorate/availab le chlorine (%)	4.1	7.7	7.6		
Alkalinity: CIPAC MT		Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		
Dilution		Packaging	N/A	No deformation or alteration	No deformation or alteration		
		Weight loss	N/A	0.05%	0.12%		of available chlorine) after
41.1		pH on neat item	12.2	N/A	12.3		storage. Please
		Free alkalinity	0.12% NaOH w/w	N/A	0.13% NaOH w/w		refer to human health section regarding
		Dilution stability in water at 1.0% v/v and after 24h	No separated material	N/A	No separated material		conclusion on chlorate content.
		Dilution stability in water at 30% v/v and after 24h	No separated material	N/A	No separated material		
	Chlorate: See section 2.2.5  Appearance and packaging: visual observation  pH: CIPAC MT 75.3  Alkalinity: CIPAC MT 191  Dilution stability: CIPAC MT	Chlorate: See section 2.2.5  Appearance and packaging: visual observation  pH: CIPAC MT 75.3  Alkalinity: CIPAC MT 191  Dilution stability: CIPAC MT	Chlorate: See section 2.2.5  Appearance and packaging: visual observation  PH: CIPAC MT 75.3  Alkalinity: CIPAC MT 191  Dilution stability: CIPAC MT 41.1  Dilution stability: CIPAC MT 41.1  Dilution stability: CIPAC MT 41.1  Dilution stability: CIPAC MT 41.1	Chlorate: See section 2.2.5  Appearance and packaging: visual observation PH: CIPAC MT 75.3  Alkalinity: CIPAC MT 191  Dilution stability: CIPAC MT 41.1  Active chlorine 26.7 g/kg  Chlorate 0.86 g/kg  Sodium Chlorate Sodium chlorate/availab le chlorine (%)  Appearance Light yellow translucent liquid  Packaging N/A  Weight loss N/A  PH on neat item 12.2  Free alkalinity 0.12% NaOH w/w  Dilution stability in water at 1.0% v/v and after 24h  Dilution stability in water at 30% v/v and after 24h  Dilution stability in water at 30% v/v and after	Substance (% (w/w)  Chlorate: See section 2.2.5  Appearance and packaging: visual observation PH: CIPAC MT 75.3  Alkalinity: CIPAC MT 191  Dilution stability: CIPAC MT 41.1  CIPAC MT 41.1  Substance (% (w/w))  Active chlorine 26.7 g/kg 22.3 g/kg (83.5% of initial) 1.35 g/kg (156.6% of initial) 1.35 g/kg (156.6% of initial) 1.7 g/kg 1.7 g/kg 2.3 g/kg (83.5% of initial) 1.35 g/kg (156.6% of initial) 1.35 g/kg (156.6% of initial) 1.7 g/kg 2.3 g/kg (83.5% of initial) 1.35 g/kg (156.6% of initial) 1.35 g/kg (156.6% of initial) 1.7 g/kg 2.3 g/kg (83.5% of initial) 1.35 g/kg (156.6% of initial) 1.35 g/kg (156.6% of initial) 1.7 g/kg 2.3 g/kg (83.5% of initial) 1.35 g/kg (156.6% of initial) 1.35	Chlorate: See section 2.2.5	Chlorate: See section   2.2.5   Active chlorine   26.7 g/kg   22.3 g/kg   (83.5% of initial)   (86.9% of initial

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results			Reference	eCA assessment	
			However, this the in-use cond It should be no maximum cont	stance content de has been taken in centration of the poten that the contrent set in the regine) after 6 and 9				
	GIFAP monograph no.17	Meta SPC 2 (10.08% sodium hypochlorite)		was stored in HDP and protected fro	PE 1L bottles at amount om light.	oient temperature	E. Servajean, 2021, report 20-30-016-	
	Active		RESULTS	UPON RECEIPT	AFTER 3 MONTHS	AFTER 5.5 MONTHS	ES Part 2	is >10%. The product
	chlorine: See section 2.2.5 Chlorate:		Active chlorine	98.7 g/kg	70.1 g/kg (71.1% of initial)	33.9 g/kg (34.4% of initial)		could be considered stable after 3 months at ambient temperature, providing that efficacy tests are acceptable.  Chlorate content is higher than the maximum content set in the regulation (sodium chlorate: ≤5.4% of available chlorine) before and after storage. Please refer to human health section regarding conclusion on
	See section 2.2.5		Chlorate	7.05 g/kg	13.1 g/kg (185.6% of initial)	20.4 g/kg (288.9% of initial)		
	Appearance and packaging:		Sodium chlorate	9 g/kg	16.7 g/kg	26 g/kg		
	visual observation  pH: CIPAC MT 75.3		Sodium chlorate/av ailable chlorine (%)	9.1	23.8	76.7	1 1	
	Alkalinity: CIPAC MT 191		Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		
	Dilution		Packaging	N/A	No deformation or alteration	No deformation or alteration		
	stability:		Weight loss	N/A	0.03%	0.06%		
	CIPAC MT 41.1		pH on neat item	12.8	N/A	12.8		
			Free alkalinity	0.38% NaOH	N/A	0.38% NaOH w/w		chlorate content.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Results				eCA assessment
	Persistent			w/w				
	foaming: CIPAC MT 47.3		Dilution stability in water at 25% v/v and after 24h	No separated material	N/A	Sparse flocculated material at the bottom (< 2mL)		
			Dilution stability in water at 50% v/v and after 24h	No separated material	N/A	Sparse flocculated material at the bottom (<2mL)		
			Persistent foaming at 25% v/v	No foam after 1 min	N/A	No foam after 1 min		
			Persistent foaming at 50% v/v	No foam after 1 min	N/A	2mL of foam after 1 min		
			The physicochemical properties were found to be stable throughout the storage period.  The active substance content decreased by more than 10%.  However, this has been taken into account for the determination of the in-use concentration of the product.  It should be noted that the content of chlorate is higher than the maximum content set in the regulation (sodium chlorate: ≤5.4% of available chlorine) before and after storage.  Moreover, the max. use rate for this product is covered by the concentation tested (25% v/v).					
	GIFAP monograph no.17	Meta SPC 2 (13.125% sodium hypochlorite)	Ongoing study (6 months at ambient temperature). Intermediate results up to 3 months of storage are available. The test item was stored in HDPE 1L bottles at 18-22°C protected from light.				E. Servajean, 2021, report 20-30-047- ES Interim	The degradation of the active content is >10%.
	Active chlorine: See section 2.2.5		RESULTS	Upon recei	PT	AFTER 3 MONTHS		The product could be considered

Property	Guideline and Method	Clinctance / V/a	Results		Reference	eCA assessment	
Chlorate: See section		Active chlorine	123.5 g/kg	104.9 g/kg (85.0% of initial)		stable after 3 months at ambient	
	2.2.5		Chlorate	2.02 g/kg	16.1 g/kg (797.0% of initial)		temperature, providing that
	Appearance and packaging:		Sodium chlorate	2.6 g/kg	20.5 g/kg		efficacy tests are acceptable.
	visual observation pH: CIPAC		Sodium chlorate/ava ilable chlorine (%)	2	19.6		Chlorate content is higher than the maximum content set in
	MT 75.3		Appearance	Light yellow translucent liquid	Light yellow translucent liquid		the regulation (sodium chlorate: ≤5.4% of available chlorine) after
	Alkalinity: CIPAC MT 191		Packaging	N/A	No deformation or alteration		
	191		Weight loss	N/A	0.09%		storage. Please
	Dilution stability:		pH on neat item	12.9	12.8		refer to human health section regarding conclusion on chlorate content.
	CIPAC MT 41.1		Free alkalinity	0.38% NaOH w/w	0.38% NaOH w/w		
	Persistent foaming: CIPAC MT 47.3		Dilution stability in water at 1.67% v/v in water and after 24h	2 mL flocculated material at the bottom	2 mL flocculated material at the bottom		
			Persistent foaming at 0.2% v/v in water	No foam after 1 min	No foam after 1 min		
			Persistent foaming at 2% v/v in water	No foam after 1 min	No foam after 1 min		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	eCA assessment	
	GIFAP	Moto CDC 2 (15 2250)	the storage period. The active substance higher than 50% aft into account for the product. It should be noted the maximum content seavailable chlorine) a Moreover, the max. concentation tested (25% v/v).	use rate for this product 10.089	E Convoicen	The degradation	
	monograph no.17	Meta SPC 2 (15.225% sodium hypochlorite)	Intermediate results	onths at ambient tempe up to 3 months of stor ored in HDPE 1L bottles	E. Servajean, 2021, report 20-30-042- ES Interim	The degradation of the active content is >10%.	
	Active chlorine: See		RESULTS	UPON RECEIPT	AFTER 3 MONTHS		The product could be
	section 2.2.5		Active chlorine	147.1 g/kg	115.9 g/kg (78.8% of initial)		considered stable after 3 months at ambient temperature,
	Chlorate: See section 2.2.5		Chlorate	2.43 g/kg	22.2 g/kg (913.4% of initial)		
	Appearance		Sodium chlorate	3.1 g/kg	28.3 g/kg		providing that efficacy tests are
	and packaging: visual		Sodium chlorate/availabl e chlorine (%)	2.1	24.4		acceptable.  Chlorate content
	observation		Appearance	Light yellow translucent liquid	Light yellow translucent liquid		is higher than the maximum
	pH: CIPAC MT 75.3		Packaging	N/A	No deformation or alteration		content set in the regulation (sodium
	Alkalinity:		Weight loss	N/A	0.13%		chlorate: ≤5.4%
	CIPAC MT 191		pH on neat item	13.0	12.9		of available chlorine) after
	131		Free alkalinity	0.42% NaOH w/w	0.42% NaOH w/w		storage. Please
			Dilution stability	2 mL flocculated	2 mL flocculated		refer to human

Property	Guideline and Method	and Method   substance (% (w/w)   Results					Reference	eCA assessment		
	Dilution stability: CIPAC MT 41.1		in water at 1.67% v/v in water and after 24h	material a bottor		material at the bottom		health section regarding conclusion on chlorate content.		
	Persistent foaming: CIPAC MT		Persistent foaming at 0.167% v/v in water	No foam afte	er 1 min No	foam after 1 min				
	47.3		Persistent foaming at 1.67% v/v in water	No foam afte	er 1 min No	foam after 1 min				
			The physicochemic the storage period. The active substan However, this has the in-use concent. It should be noted maximum content available chlorine) Moreover, the max concentation tested (25% v/v).	ce content decr been taken into ration of the pro that the conten set in the regula after storage. . use rate for the d for the produc						
	GIFAP monograph no.17	Meta SPC 3 (1.575% sodium hypochlorite)	Ongoing study (24 Intermediate result The test item was a guala) at 18-22°C,	ts up to 9 mont stored in HDPE	E. Servajean, 2021, report 20-30-17-ES Interim	The degradation of the active content is >10%.				
	Active chlorine: See section 2.2.5		RESULTS	UPON RECEIPT	AFTER 6	AFTER 9 MONTHS		The product could be considered stable after 9 months at ambient temperature, providing that efficacy tests are acceptable.		
	Chlorate: See section 2.2.5		Active chlorine	15.5 g/kg	9.1 g/kg (59.0% of initial)	13.1 g/kg (84.6% of initial)				
	Appearance and		Chlorate	0.48 g/kg	0.62 g/kg (129.2% of	0.62 g/kg (130.1% of				

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	eCA assessment		
packaging:				initial)	initial)			
	visual observation		Sodium chlorate	0.6 g/kg	0.8 g/kg	0.8 g/kg		Chlorate content is higher than the maximum content set in the regulation (sodium chlorate: ≤5.4%
	pH: CIPAC MT 75.3 Alkalinity:		Sodium chlorate/avail able chlorine (%)	3.9	8.7	6		
	CIPAC MT 191		Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		of available chlorine) after storage. Please
	Priming and discharge rate: FEA 643		Packaging	N/A	No deformation or alteration	No deformation or alteration		refer to human health section regarding conclusion on
	043		Weight loss	N/A	0.04%	0.07%		chlorate content.
	Spray pattern: FEA		pH on neat item	12.0	N/A	12.1		Moeover, it
	644		Free alkalinity	0.07% NaOH w/w	N/A	0.08% NaOH w/w		should be noted that the spray particles size distribution after storage is missing.
			Spraying performances - Priming and discharge rate	Primed on the 6th stroke Discharge rate 1.30 g (Unit 1) 1.34 g (Unit 2) No clogging	N/A	Primed on the 6th stroke Discharge rate 1.30 g (Unit 1) 1.31 g (Unit 2) No clogging		
			Spraying performances - Spray pattern	Round shape 20-23 cm diameter	N/A	Round shape 15-19 cm diameter		
			the storage period The active substa However, this ha	od. ance content decr	reased by more account for the	stable throughout than 10%.		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	eCA assessment		
			It should be noted maximum content available chlorine.  Moreover, the spr performed after 6 only after 24 mon	t set in the reguent after storage.  Tay particles size and 9 months,				
	GIFAP monograph no.17 CIPAC MT 187	Meta SPC 3 (1.575% sodium hypochlorite)	Assessment of the ongoing (24-mont	spray particles	P. Padilla, study 20- 914015-001	The particles size distribution after storage should be provided in postauthorisation.		
	GIFAP monograph no.17 Meta SPC 5 (5.145% sodium hypochlorite)	Storage at ambier The test item was light.		E. Servajean, 2021, report 20-30-019- ES Part 2	The degradation of the active content is >10%.			
	Active chlorine: See		RESULTS	UPON RECEIPT	After 3 months	AFTER 5.5 MONTHS		The product could be
	section 2.2.5 Chlorate: See section		Active chlorine	48.2 g/kg	34.2 g/kg (70.8% of initial)	32.0 g/kg (66.4% of initial)		considered stable after 8 months at ambient
	2.2.5 Appearance		Chlorate	2.48 g/kg	3.71 g/kg	4.93 g/kg		temperature, providing that efficacy tests are
	and packaging: visual observation		Sodium chlorate	3.2 g/kg	4.7 g/kg	6.3 g/kg		acceptable.  Chlorate content is higher than
	pH: CIPAC MT 75.3		Sodium chlorate/availa ble chlorine (%)	6.5	13.8	19.6		the maximum content set in the regulation (sodium
	Alkalinity: CIPAC MT 191		Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		chlorate: ≤5.4% of available chlorine) before and after

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		Reference	eCA assessment		
	Dilution stability: CIPAC MT		Packaging	N/A	No deformation or alteration	No deformation or alteration		storage. Please refer to human health section
	41.1		Weight loss	N/A	%	%	C	regarding conclusion on
	Persistent foaming:		pH on neat item	12.4	N/A	N/A		chlorate content.
	CIPAC MT 47.3		Free alkalinity	0.20% NaOH w/w	N/A	N/A		
			Persistent foaming at 1.0% v/v in water	60 mL of foam after 1 min (30%)	N/A	N/A		
			Persistent foaming at 4.0% v/v in water	82 mL of foam after 1 min (41%)	N/A	N/A		
			Dilution stability in water at 4.0% v/v	No separated material	N/A	N/A		
			RESULTS	UPON RECEIPT	AFTER 7 MONTHS	AFTER 8 MONTHS		
			Active chlorine	48.2 g/kg	32.0 g/kg (66.3% of initial)	34.5 g/kg (71.6% of initial)		
			Chlorate	2.48 g/kg	4.56 g/kg	3.84 g/kg		
			Sodium chlorate	3.2 g/kg	5.8 g/kg	4.9 g/kg		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results				Reference	eCA assessment
			Sodium chlorate/availa ble chlorine (%)	6.5	18.1	14.2		
			Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		
			Packaging	N/A	No deformation or alteration	No deformation or alteration		
			Weight loss	N/A	0.04%	0.03%		
			pH on neat item	12.4	N/A	11.8		
			Free alkalinity	0.20% NaOH w/w	N/A	0.12% NaOH w/w		
			Persistent foaming at 1.0% v/v in water	60 mL of foam after 1 min (30%)	N/A	54 mL of foam after 1 min (27%)		
			Persistent foaming at 4.0% v/v in water	82 mL of foam after 1 min (41%)	N/A	84 mL of foam after 1 min (42%)		
			Dilution stability in water at 4.0% v/v	No separated material	N/A	No separated material		
			The physicochemic the storage period The active substate However, this has the in-use concentration.	d. nce content decr s been taken into	reased by more to account for the	han 10%.		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
			It should be not maximum cont available chlori.  For Meta SPC 5 stability and th max. use rate. As the foam is foamig formula	ent set in the ne) before and of a use rate of e persistent for > 60 mL at 40	regulation (so d after storage f 15% has bee paming should	dium chlorate e. en claimed. Th have been tes	: ≤5.4% of e dilution sted at the		
	GIFAP monograph no.17 Active	Meta SPC 8 (2.73% sodium hypochlorite)	Ongoing study was stored in H Intermediate re	(24 months a IDPE 1L bottle	s at 18-22°C	protected from	ı light.	E. Servajean, 2021, report 20-30-021- ES Interim	of the active content is >10%. The product
	chlorine: See section 2.2.5		RESULTS	Upon RECEIPT	AFTER 3 MONTHS	AFTER 6 MONTHS	AFTER 9 MONTHS		could be considered
	Chlorate: See section 2.2.5		Active chlorine	27.0 g/kg	23.5 g/kg (87.1% of initial)	20.2 g/kg (74.9% of initial)	24.0 g/kg (88.7% of initial)		stable after 9 months at ambient temperature,
	Appearance		Chlorate	0.82 g/kg	1.27 g/kg	1.36 g/kg	1.34 g/kg		providing that efficacy tests are
	and packaging: visual		Sodium chlorate	1 g/kg	1.6 g/kg	1.7 g/kg	1.7 g/kg		acceptable. Chlorate content
	observation  pH: CIPAC  MT 75.3		Sodium chlorate/ava ilable chlorine (%)	3.9	6.9	8.6	7.1		is higher than the maximum content set in the regulation
	Alkalinity: CIPAC MT 191		Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		(sodium chlorate: ≤5.4% of available chlorine) after
	Dilution stability: CIPAC MT 41.1		Packaging	N/A	No deformatio n or alteration	No deformatio n or alteration	No deformatio n or alteration		storage. Please refer to human health section regarding
	71.1		Weight loss	N/A	0.02%	0.03%	0.09%		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
	Persistent		pH on neat item	12.2	N/A	N/A	12.0		conclusion on chlorate content.
	foaming: CIPAC MT 47.3		Free alkalinity	0.11% NaOH w/w	N/A	N/A	0.09% NaOH w/w	,	
			Dilution stability in water at 1.0% v/v	No separated material	N/A	N/A	No separated material		
			Dilution stability in water at 30% v/v	No separated material	N/A	N/A	No separated material		
			Persistent foaming at 1.0% v/v	32 mL of foam after 1 min (16%)	N/A	N/A	30 mL of foam after 1 min (15%)		
			Persistent foaming at 30% v/v	100 mL of foam after 1 min (50%)	N/A	N/A	88 mL of foam after 1 min (44%)		
			The physicoche the storage per The active substitute in-use cond It should be not maximum control available chlori As the foam is foamig formula	riod. stance conter has been take centration of b ted that the cent set in the ine) after stor > 60 mL at 3	nt decreased by en into account the product. content of chlor e regulation (so	more than 1 for the deter rate is higher dium chlorate	0%. mination of than the :: ≤5.4% of		
Storage stability test – low temperature stability test for	CIPAC MT 39.3	Meta SPC 1 (2.73% sodium hypochlorite)	Storage proced	dure at 0°C fo	or 7 days. Initial	7 day	at 0°C	E. Servajean, 2020, report 20-30-009-	The product is stable after a storage of 7
liquids			Appear	rance	Light yello	ow translucen	t liquid	ES Part 1	days at 0°C.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results			Reference	eCA assessment
			Available chlorine (g/kg)	26.7 g/kg	27.2 g/kg (101.9% of initial)		
			pH on neat item	12.2	12.3		
			pH of a 1% w/v dilution	10.3	10.4		
			alkalinity (%w/w as NaOH)	0.12% NaOH w/w	0.12% NaOH w/w		
			No separated solid or oily n procedure. The product is t				
	CIPAC MT 39.3	Meta SPC 2 (10.08% sodium hypochlorite)	Storage procedure at 0°C f	or 7 days.		E. Servajean, 2020, report	The product is stable after a
		, , , , , , , , , , , , , , , , , , , ,		Initial	7 day at 0°C	20-30-016- ES Part 1	storage of 7 days at 0°C.
			Appearance	Light yellow tra		LS Fait 1	udys at 0°C.
			Available chlorine (g/kg)	98.7 g/kg	87.2 g/kg (88.3% of initial)		
			pH on neat item	12.8	12.8		
			pH of a 1% w/v dilution	10.9	11		
			alkalinity (%w/w as NaOH)	0.38% NaOH w/w	0.37% NaOH w/w		
			No separated solid or oily no procedure. A decrease of the active su storage. However, this degumbient temperature and is The product is therefore co	bstance contente >10 radation is also noted s not due to low stora nsidered stable at low	% is observed after during storage at ge.		
	CIPAC MT 39.3	Meta SPC 3 (1.575% sodium hypochlorite)	Storage procedure at 0°C f	or 7 days.		E. Servajean, 2020, report	The product is stable after a
	33.3	Socialiti Hypocillorite)		Initial	7 day at 0°C	20-30-017-	storage of 7
			Appearance	Light yellow tra		ES Part 1	days at 0°C.
			Available chlorine (g/kg)	15.5 g/kg	15.2 g/kg (98.2% of initial)		
			pH on neat item	12.0	12.1		
			pH of a 1% w/v dilution	10.1	10.2		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results			Reference	eCA assessment
			alkalinity (%w/w as		0.050/ N. O.I. /		
			NaOH)	0.07% NaOH w/w	0.06% NaOH w/w		
			No separated solid or oily n procedure. The product is t				
	CIPAC MT 39.3	Meta SPC 5 (5.145% sodium hypochlorite)	Storage procedure at 0°C f	or 7 days.		E. Servajean, 2020, report	rt stable after a
				Initial	7 day at 0°C	20-30-019- ES Part 1	storage of 7 days at 0°C.
			Appearance	Light yellow tra		ES Part 1	days at 0°C.
			Available chlorine (g/kg)	48.2 g/kg	46.2 g/kg (95.9% of initial)		
			pH on neat item	12.4	12.5		
			pH of a 1% w/v dilution	11.6	10.7		
			alkalinity (%w/w as NaOH)	0.20% NaOH w/w	0.19% NaOH w/w		
			No separated solid or oily n procedure. The product is t				
	CIPAC MT 39.3	Meta SPC 8 (2.73% sodium hypochlorite)	Storage procedure at 0°C f		,	E. Servajean, 2020, report	The product is stable after a
				Initial	7 day at 0°C	20-30-021-	storage of 7
			Appearance	Colourless tran	nslucent liquid	ES Part 1	days at 0°C.
			Available chlorine (g/kg)	27.0 g/kg	26.4 g/kg (97.5% of initial)		
			pH on neat item	12.2	12.2		
			pH of a 1% w/v dilution	11.4	10.4		
			alkalinity (%w/w as NaOH)	0.11% NaOH w/w	0.09% NaOH w/w		
			No separated solid or oily n procedure. The product is t	herefore stable at low	v temperatures.		
Effects on content of the active substance and technical	Waived		Not relevant (The opaque r protect the products from t		rs is sufficient to		According to the CAR of the
							active

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
Effects on content of the active substance and technical characteristics of the biocidal product – temperature and	CIPAC method MT46.3 accelerated storage procedure in	0.98% and 12.78 % active chlorine	Storage at 54.5°C for 14 days  - the analytical results demonstrated a diminution of active chlorine from 0.98 to < 0.0003 % and an augmentation of sodium chlorate from 0.03 to 0.13 %;	Study report RRCo- 000377_01 and Study report RRCo- 000375_01	substance, sodium hypochlorite is very sensitive to photolysis in water. An adequate mitigation measure "protect from direct sunlight" should be added on the label of products.  The products should not be stored above 30°C.
humidity	accordance with OECD Guidance document ENV/JM/MON O(2015)32		- the analytical results demonstrated a diminution of active chlorine from 12.78 to 2.01 % and an augmentation of sodium chlorate from 2.57 to 7.43 %;  Considering both results, all products of the family should not be stored above 30°C.		
Effects on content of the active substance and technical characteristics of the biocidal product - reactivity towards container material			Assessed during the ongoing stability studies at ambient temperature. No reactivity of the formulations towards the container material was observed.		Acceptable
Wettability	Waived		Not required for SL nor AL formulations.		Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
Suspensibility, spontaneity and dispersion stability	Waived		Not required for SL nor AL formulations.		Acceptable
Wet sieve analysis and dry sieve test	Waived		Not required for SL nor AL formulations.		Acceptable
Emulsifiability, re- emulsifiability and emulsion stability	Waived		Not required for SL nor AL formulations.		Acceptable
Disintegration time	Waived		Not required for SL nor AL formulations.		Acceptable
Particle size distribution, content of dust/fines, attrition, friability	Waived	-	Particle size distribution for products of Meta SPC 3 are reported below with spray characteristics.	-	Acceptable
Persistent foaming	CIPAC MT 47.3	Meta SPC 1 (2.73% sodium hypochlorite)	Covered by Meta SPC 2: no foam is formed.	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	CIPAC MT 47.3	Meta SPC 2 (10.08% sodium hypochlorite)	At 25% v/v: no foam after 1 min.  At 50% v/v: no foam after 1 min.	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
4 C	CIPAC MT 47.3	Meta SPC 2 (13.125% sodium hypochlorite)	At 0.2% v/v: no foam after 1 min.  At 2% v/v: no foam after 1 min.  The max. use rate for this product is covered by the 25% v/v concentration tested for the 10.08% sodium hypochlorite, as all products of Meta SPC 2 are dilutions of the active substance solution.	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	CIPAC MT 47.3	Meta SPC 2 (15.225% sodium hypochlorite)	At 0.167% v/v: no foam after 1 min.  At 1.67% v/v: no foam after 1 min  The max. use rate for this product is covered by the 25% v/v concentration tested for the 10.08% sodium hypochlorite, as all products of Meta SPC 2 are dilutions of the active substance solution.	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	-	Meta SPC 3 (1.575% sodium hypochlorite)	Not required for a ready to use liquid formulation.	-	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
	CIPAC MT 47.3	Meta SPC 5 (5.145% sodium hypochlorite)	At 1% v/v: 60 mL of foam after 1 min. 50 mL after 12 min.  At 4% v/v: 82 mL of foam after 1 min. 60 mL after 12 min.  For Meta SPC 5, a use rate of 15% has been claimed. The persistent foaming should have been tested at the max. use rate.  As the foam is > 60 mL at 4% v/v, products of Meta SPC 5 are	E. Servajean, 2021, Amendment to the final report 20-30- 019-ES Part 1	Acceptable  The mention « foaming products » is proposed.
	CIPAC MT 47.3	Meta SPC 8 (2.73% sodium hypochlorite)	foamig formulations.  At 1% v/v : 32 mL of foam after 1 min.  At 30% v/v: 100 mL of foam after 1 min. 52 mL after 12 min.  As the foam is > 60 mL at 30% v/v, products of Meta SPC 8 are foamig formulations.	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable  The mention « foaming products » is proposed.
Flowability/Pourability/ Dustability	Waived		Not required for SL nor AL formulations.		Acceptable
Burning rate — smoke generators	Waived		Not required for SL nor AL formulations.		Acceptable
Burning completeness  — smoke generators	Waived		Not required for SL nor AL formulations.		Acceptable
Composition of smoke — smoke generators	Waived		Not required for SL nor AL formulations.		Acceptable
Spraying pattern — aerosols	Waived		The products are not aerosols.		Acceptable
Spray characteristics – trigger spray	Priming and discharge rate: FEA 643  Spray pattern: FEA 644	Meta SPC 3 (1.575% sodium hypochlorite)	Priming: Primed on the 6th stroke. Discharge rate = 1.32 g/spray.  Spray pattern: Round shape, 20-23 cm diameter.	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
Particle size distribution – trigger spray	CIPAC MT 187	Meta SPC 3 (1.575% sodium hypochlorite)	The percentage of the respirable volume fraction less than 10 $\mu m$ is 0.081%. The mean results on three assays are the following: Dv(0.1) = 84.73 $\mu m$ Dv(0.5) = 193.6 $\mu m$	P. Padilla, 2021, Intermediary report 20- 914015-001	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
			$Dv(0.9) = 540.5 \mu m$		
Physical compatibility	Waived		The formulations of the family are not used in combination with other products.		Acceptable
Chemical compatibility	Waived	Meta SPC 1 Meta SPC 3 Meta SPC 8	The formulations of the family are not used in combination with other products.		According to the current knowledge, sodium hypochlorite can react with acids to form chlorine gas. The mention "EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine)" is proposed by the applicant. Products should not be used in conjunction with acids or ammonia.
		Meta SPC 2	The formulations of the family are not used in combination with other products.		According to the current knowledge, sodium hypochlorite can react with acids to form chlorine gas.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
					The mention "EUH206: Warning! Do not use together with other products. May release dangerous gases (chlorine)" is proposed by the applicant. Moreover, the mention EUH031 "contact with acids liberates toxic gas" is also proposed by the applicant. Products should not be used in conjunction with acids or ammonia.
		Meta SPC 5	The formulations of the family are not used in combination with other products.		According to the current knowledge, sodium hypochlorite can react with acids to form chlorine gas. The mention "EUH206: Warning! Do not use together with other products. May release

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
Degree of dissolution and dilution stability	CIPAC MT 41.1	Meta SPC 1 (2.73% sodium hypochlorite)	At 1% v/v: no separated material.	E. Servajean, 2020, report	dangerous gases (chlorine)" is proposed by eCA. Moreover, the mention EUH031 "contact with acids liberates toxic gas" is also proposed by eCA in SPC according to ATP13 of CLP regulation. Products should not be used in conjunction with acids or ammonia.  Acceptable
			At 30% v/v: no separated material.	20-30-009- ES Part 1	
	CIPAC MT 41.1	Meta SPC 2 (10.08% sodium hypochlorite)	At 25% v/v: no separated material.  At 50% v/v: no separated material.  For products containing 10.08% sodium hypochlorite, a max. use rate of 17% has been claimed for fungi. This is covered with the 2 tested concentrations.	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	CIPAC MT 41.1	Meta SPC 2 (13.125% sodium hypochlorite)	At 2% v/v: 2mL of flocculated material at the bottom.  For products containing 13.125% sodium hypochlorite, a max. use rate of 9% has been claimed for fungi. Considering that all products of Meta SPC 2 are dilutions of the active substance solution, this is covered by the 25% v/v concentration tested for the 10.08% sodium hypochlorite.	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
	CIPAC MT 41.1	Meta SPC 2 (15.225% sodium hypochlorite)	At 1.67% v/v: 2mL of flocculated material at the bottom.  For products containing 15.225% sodium hypochlorite, a max. use rate of 7.5% has been claimed for fungi. Considering that all products of Meta SPC 2 are dilutions of the active substance solution, this is covered by the 25% v/v concentration tested for the 10.08% sodium hypochlorite.	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	-	Meta SPC 3 (1.575% sodium hypochlorite)	Not required for a ready to use liquid formulation.	-	Acceptable
	CIPAC MT 41.1	Meta SPC 5 (5.145% sodium hypochlorite)	4% v/v: no separated material.  For Meta SPC 5, a use rate of 25% has been claimed for fungi. The dilution stability should have been tested at the max. use rate.	E. Servajean, 2021, Amendement to the final report 20-30- 019-ES Part 1	Acceptable
	CIPAC MT 41.1	Meta SPC 8 (2.73% sodium hypochlorite)	At 1% v/v: no separated material.  At 30% v/v: 3mL of flocculated material at the bottom.	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable
Surface tension	OECD 115	Meta SPC 1 (2.73% sodium hypochlorite)	69.9 mN/m (20°C)	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	OECD 115	Meta SPC 2 (10.08% sodium hypochlorite)	66.4 mN/m (20°C)	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	OECD 115	Meta SPC 2 (13.125% sodium hypochlorite)	75.1 mN/m (20°C)	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	OECD 115	Meta SPC 2 (15.225% sodium hypochlorite)	78.9 mN/m (20°C)	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	OECD 115	Meta SPC 3 (1.575% sodium hypochlorite)	62.5 mN/m (20°C)	E. Servajean, 2020, report	Acceptable

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	Reference	eCA assessment
				20-30-017- ES Part 1	
	OECD 115	Meta SPC 5 (5.145% sodium hypochlorite)	32.9 mN/m (20°C) The test item is considered as surface-active.	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	OECD 115	Meta SPC 8 (2.73% sodium hypochlorite)	31.7 mN/m (20°C) The test item is considered as surface-active.	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable
Viscosity (Kinematic)	OECD 114	Meta SPC 1 (2.73% sodium hypochlorite)	20°C: 1.16 mm²/s 40°C: 0.76 mm²/s	E. Servajean, 2020, report 20-30-009- ES Part 1	Acceptable
	OECD 114	Meta SPC 2 (10.08% sodium hypochlorite)	20°C: 1.77 mm²/s 40°C: 1.14 mm²/s	E. Servajean, 2020, report 20-30-016- ES Part 1	Acceptable
	OECD 114	Meta SPC 2 (13.125% sodium hypochlorite)	20°C: 2.30 mm²/s 40°C: 1.39 mm²/s	E. Servajean, 2021, report 20-30-047- ES Part 1	Acceptable
	OECD 114	Meta SPC 2 (15.225% sodium hypochlorite)	20°C: 2.65 mm²/s 40°C: 1.58 mm²/s	E. Servajean, 2021, report 20-30-042- ES Part 1	Acceptable
	OECD 114	Meta SPC 3 (1.575% sodium hypochlorite)	20°C: 1.09 mm²/s 40°C: 0.71 mm²/s	E. Servajean, 2020, report 20-30-017- ES Part 1	Acceptable
	OECD 114	Meta SPC 5 (5.145% sodium hypochlorite)	20°C: 1.38 mm²/s 40°C: 0.87 mm²/s	E. Servajean, 2020, report 20-30-019- ES Part 1	Acceptable
	OECD 114	Meta SPC 8 (2.73% sodium hypochlorite)	20°C: 1.22 mm²/s 40°C: 0.74 mm²/s	E. Servajean, 2020, report 20-30-021- ES Part 1	Acceptable

## NA-MIC minor change application (2022)

The applicant claims longer shelf lives for Meta SPC 1, 3 and 8:

- 18 months for meta SPC 1.
- 24 months for meta SPC 3.
- 18 months for meta SPC 8.

The storage stability studies at ambient temperatures have been finalised for meta SPCs 1, 3 and 8. Their results are summarised in the below table.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
Storage stability test	GIFAP monograph	Meta SPC 1 (2.73% sodium	The test item was	The test item was stored in HDPE 1L bottles at 18-22°C protected from light.					Products of Meta SPC 1 are identical. They are
<ul><li>long term storage at</li></ul>	no.17	hypochlorite) Bath 47-20-	RESULTS	UPON RECEIPT	AFTER 12 MONTHS	AFTER 18 MONTHS	AFTER 24 MONTHS	2022, report No.	SL formulation and the proposed use rate is
ambient temperature	Active chlorine: See section 2.2.5 Chlorate: See	097	Active chlorine (measured) IC method validated	26.7 g/kg	22.08 g/kg (82.8% of initial)	21.91 g/kg (82.1% of initial)	21.0 g/kg (78.6% of initial)	20-30-009- ES-FR2	30% v/v. A shelf life of 18 months is claimed by the applicant. Loss of active
	section 2.2.5		NaOCI equivalent	28.04 g/kg	23.2 g/kg	23.00 g/kg	22.05 g/kg		substance content after 18M exceeds 10% of initial content.  Technical properties are acceptable after 24M and they are considered sufficiently
			Chlorate (measured) LC-MS method validated	0.86 g/kg	2.14 g/kg (248.6% of initial)	2.59 g/kg (301.5% of initial)	2.83 g/kg (393.3% of initial)		
			Sodium Chlorate equivalent	1.1 g/kg	2.7 g/kg	3.3 g/kg	3.6 g/kg		representative for the claimed shelf life of 18M. Persistent
			Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		foaming was not provided. However, according to the composition, such
									property is not relevant and was not requested in the

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
			Sodium chlorate/availab le chlorine (%)	4.1	12.3	15.1	17.2		framework of the first authorisation.
			pH (neat item) CIPAC MT 75.3	12.2	-	-	12.3		The product could be considered stable after 18 months at ambient temperature, providing
			pH 1% w/v CIPAC MT 75.3	10.3	-	-	10.4		that efficacy tests are acceptable (see efficacy section).
			Free alkalinity CIPAC MT 191	0.12% w/w as NaOH	-	-	0.13% w/w as NaOH		Moreover, chlorate content is higher than
			Dilution stability at 1% v/v CIPAC MT 41.1	No separated material	-	-	No separated material		the maximum content set in the regulation (sodium chlorate: ≤5.4% of available
			Dilution stability at 30% v/v CIPAC MT 41.1	No separated material	-	-	No separated material		chlorine) after storage. Please refer to human health section regarding conclusion on chlorate content.
			The active substar account for the de found that the acti 18 months of stora It should be noted set in the regulatio 24 months of stora the risk assessment The physicochemic Therefore, the she	termination of the control of the control of the control of the content on (sodium chlor age, but this is ants.  The control of the content of the control o	ne in-use concentent was sufficient to of chlorate is his rate: ≤5.4% of a receptable as the	tration of the pro t to guarantee the igher than the ma vailable chlorine) maximum levels e stable.	aduct, and its was ne efficacy up to aximum content after 12, 18 and		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
	GIFAP monograph no.17	sodium	The test item was protected from lig		0.8L bottles with	sprayers (TS5 gu	uala) at 18-22°C,	E. Servajean, 2022,	Products of Meta SPC 3 are identical. They are ready to use
	Active	hypochlorite) Batch 58-20-	RESULTS	UPON RECEIPT	AFTER 12 MONTHS	AFTER 18 MONTHS	AFTER 24 MONTHS	report No. 20-30-017-	formulation (spray). A shelf life of 24
	chlorine: See section 2.2.5  Chlorate: See section 2.2.5	001B	Active chlorine (measured) IC method validated	15.5 g/kg	13.49 g/kg (87.3% of initial)	13.73 g/kg (88.8% of initial)	11.7 g/kg (75.8% of initial)	ES-FR2	months is claimed by the applicant. Loss of active substance content after 24M exceeds
			NaOCl equivalent	16.3 g/kg	14.2 g/kg	14.4 g/kg	12.3 g/kg		10% of initial content.  Technical
			Chlorate (measured) LC-MS method validated	0.48 g/kg	0.78 g/kg (162.1% of initial)	0.93 g/kg (193.2% of initial)	1.09 g/kg (227.5% of initial)		characteristics after storage were found acceptable. However, it should be noted that the spray particles size
			Sodium Chlorate equivalent	0.6 g/kg	0.99 g/kg	1.18 g/kg	1.4 g/kg		distribution after storage is missing (post authorisation
			Sodium chlorate/availa ble chlorine (%)	3.9	7.3	8.6	11.9	-	data required in the framework of the first authorisation).  Therefore, the product
			Appearance	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid	Light yellow translucent liquid		could be considered stable after 24 months at ambient
			pH (neat item) CIPAC MT 75.3	12.0	-	-	12.1		temperature, providing that efficacy tests are acceptable (see
			pH (1% w/v) CIPAC MT 75.3	10.1	-	-	9.9		efficaciy section)  Chlorate content is higher than the
									maximum content set

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
			Free alkalinity CIPAC MT 191	0.07% w/w as NaOH	-	-	0.07% w/w as NaOH		in the regulation (sodium chlorate: ≤5.4% of available
			Number of strokes required for priming FEA 643	6	-	-	6		chlorine) after storage. Please refer to human health section regarding conclusion on chlorate content.
			Discharge rate FEA 643	1.32 g/spray	-	-	1.33 g/spray		
			Spray pattern FEA 643	Round shape 20-23 cm diameter			Round shape 18-24 cm diameter		
			The active substars show that the conmonth storage. It should be noted set in the regulati months and 24 of in the risk assess. The physicochemi	centration of act I that the conten on (sodium chlor storage, but this nents. cal properties of elf-life of meta SI	t of chlorine is stited to f chlorate is heate: ≤5.4% of a sis acceptable as the product were PC 3 is set at 24	ill efficacious at t igher than the m vailable chlorine s the maximum l e stable. months.	he end of the 24- aximum content after 12, 18 evels are covered		
	GIFAP monograph	Meta SPC 8 (2.73% sodium					_	E. Servajean,	Products of Meta SPC 8 are SL formulation and
	no.17	hypochlorite) Batch 54-20-	RESULTS	UPON RECEIPT	AFTER 12 MONTHS	AFTER 18 MONTHS	AFTER 24 MONTHS	2022, Report no.	the proposed use rate is 30% v/v.
	Active chlorine: See section 2.2.5	010B (sodium hypochlorite 2.6% + 5% perfumed	Active chlorine (measured) IC method validated	27.0 g/kg	22.49 g/kg (83.2% of initial)	22.55 g/kg (83.44% of initial)	10.3 g/kg (38.2% of initial)	20-30-021- ES-FR2	A shelf life of 18 months is claimed by the applicant. Loss of active
	Chlorate: See section 2.2.5	uetergent)	vanuateu						substance content

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
			NaOCl equivalent	28.35 g/kg	23.61 g/kg	23.68 g/kg	10.82 g/kg		after 18M exceeds 10% of initial content
			Chlorate (measured) LC-MS method validated	0.82 g/kg	2.02 g/kg (246.2% of initial)	2.41 g/kg (293.3 g/kg)	4.08 g/kg (496.5% of initial)		Technical characteristics after storage 24M were found acceptable. The
			Sodium Chlorate equivalent	1 g/kg	2.6 g/kg	3.08 g/kg	5.2 g/kg		products are foaming formulations. However, it was noticed that pH
			Sodium chlorate/availa ble chlorine (%)	3.7	11.6	13.7	50.5		has decreased significantly after 24M. The product appears more stable after 18M than after 24M:
			Appearance	Light yellow transluscent liquid	Light yellow transluscent liquid	Light yellow transluscent liquid	Light yellow transluscent liquid		content of av.Cl is higher than 2% after 18M, while it fell below
			pH (neat item) CIPAC MT 75.3	12.2	-	-	9.5		1% after 24%. pH is probably more alkaline after 18M, explaining
			pH (1% w/v) CIPAC MT 75.3						this better stability.
			Free alkalinity CIPAC MT 191	0.11% w/w as NaOH	-	-	0.05% w/w as NaOH		Therefore, the product could be considered stable after 18 months
			Dilution stability at 1% v/v CIPAC MT 41.1	No separated material	-	-	No separated material		at ambient temperature, providing that efficacy tests are acceptable (see
			Dilution stability at 30% v/v CIPAC MT 41.1	No separated material	-	-	Few flocculated material at the bottom		efficacy section).  Chlorate content is higher than the maximum content set
			Persistent foaming at 1%	32 mL of foam after 1	-	-	No foam after 1 min		in the regulation (sodium chlorate:

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results					Reference	eCA assessment
			v/v CIPAC MT 47.3	min (16%)					≤5.4% of available chlorine) after storage.
			Persistent foaming at 30% v/v CIPAC M 47.3	100 mL of foam after 1 min (50%)	-	-	45 mL of foam after 1 min (23%)		Please refer to human health section regarding conclusion on chlorate content.
			The active substa significant after 2: Efficacy data show months of storage It should be noted set in the regulati months of storage risk assessments. Some variations obut this will not in (e.g. the pH becocorrosive while the large decrease storage. 18-mont those of fresh pro	4 months.  y that the concere.  I that the content on (sodium chlore, but this is accessored the physicochempact negatively mes more neutrate active chlorine of active substates old products y ducts.	ntration of active  at of chlorate is herate: ≤5.4% of a eptable as the manical properties the use of the properties of	chlorine is still edigher than the movement of the movement of the second of the secon	aximum content aximum content after 12 and 18 e covered in the ter 24 months, fety of the user oduct is less tions are due to months of		

### Conclusion on the physical, chemical and technical properties of the product

The products of the biocidal product family are light yellow or colourless translucent liquids. The pH of the neat formulations ranges from 12 to 13, the alkalinity ranges from 0.07% to 0.42% as NaOH and the relative density ranges from 1.028 to 1.242.

Products of Meta SPC 5 and 8 are surface active and all products have been demonstrated to be stable at low temperatures.

After accelerated storage (54 ° C / 2 weeks), the degradation of the active content was > 10% for all tested products. Therefore, the products should not be stored above 30°C.

Results of the ambient storage stability studies show a significant loss in active substance content and increase in sodium chlorate content for all tested products. Moreover, it should be noted that the chlorate content is higher than the maximum content set in the regulation after storage for all tested products.

The shelf lives of meta SPCs (considering a maximum of 50% degradation of active chlorine) are reported below:

- 9 months for Meta SPC 1.
- 3 months for Meta SPC 2.
- 9 months for Meta SPC 3.
- 8 months for Meta SPC 5.
- 9 months for Meta SPC 8.

The active substance will decompose in the presence of sunlight/UV. Therefore, the products should be kept protected from direct sunlight.

Products of Meta SPC 5 and 8 are foaming formulations.

The mention EUH206 is applied for all products of the family. Moreover, the mention EUH031 is applied for products of Meta SPC 5 and 2.

All products should not be used in conjunction with acids or ammonia.

For Meta SPC 3, the spray particles size distribution after storage is required in post authorisation.

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Final storage studies up to 24 months of storage are available for meta SPCs 1, 3 and 8. The results show that the active chlorine level of the products remains above the validated efficacious threshold after respectively 18, 24 and 18 months, meaning that the in-use dilutions previously authorised do not need to be updated.

New chlorate contents after 18/24/18M for Meta SPC 1/3/8 have been taken into account for risk assessment. Please refer to HH, ENV and residues sections.

The physicochemical properties of the test items after storage show that the products can still be used properly.

In conclusion, the following shelf-lives are set:

- 18 months for meta SPC 1.
- 24 months for meta SPC 3.
- 18 months for meta SPC 8.

### 2.2.3 Physical hazards and respective characteristics

Most physical hazards have been waived based on the products compositions and on experience in their handling.

Some studies are available to cover the following hazard categories:

• Flammable liquids and auto-ignition temperature

Test on a fictive mixture containing the maximum concentration of active substance that can be in contact with organic matter (formulation reported in confidential annex in the BPF excel file) and the maximum contenant of organic matter in the family. This formulation covers all the products of the family.

Corrosive to metals

Test on the formulation with the lowest active substance concentration in the family (formulation of Meta SPC 3 containing 1.5% active chlorine - 1.575% sodium hypochlorite). The objective is to confirm that this product needs to be classified as corrosive to metals, and so that all other products also need to be classified.

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	FR Evaluation	Reference
Explosives	statement	Meta SPC 1,2 and 3	The products are dilutions of the active substance therefore read across to the active substance data set is applicable.  A sodium hypochlorite aqueous solution with an active chlorine concentration of 15.9% w/w was considered for explosive properties. The active substance is not explosive.	According to the CAR (confirmatory data peer reviewed in 2018), solutions of NaClO (16.7%) are not explosive. Based on the composition of the products of Meta SPC 1 and 3, cross reading is acceptable since data from the CAR are a worst case.	
		Meta SPC 5 and 8	As no component of the mixtures has been classified for explosive properties, the products are not classified for such hazards, because no reaction/synergy is expected. Besides no chemical group associated with explosive properties is present in the mixtures.	Acceptable	C&L inventory (harmonised classification)
Flammable gases	waived			Not relevant as the products are liquids.	
Flammable aerosols	waived			Not relevant as the products are not aerosols.	
Oxidising gases	waived			Not relevant as the products are liquids.	
Gases under pressure	waived			Not relevant as the products are not gases under pressure.	

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	FR Evaluation	Reference
Flammable liquids	EC Method A.9	Fictive mixture containing the maximum concentration of active substance that can be in contact with organic matter (4.9% sodium hypochlorite) and the maximum contenant of organic matter in the family.	No flash point was osbserved up to 100°C. Therefore, it can be concluded that no formulation of the family is flammable.	Acceptable	P. Padilla, 2021, report 20-914015- 003
Flammable solids	waived			Not relevant as the products are liquids	
Self-reactive substances and mixtures	statement		According to Guidance on the application of the CLP criteria, "substances and mixtures must be considered for classification in this hazard class unless there are no chemical groups present in the molecule associated with explosive or self-reactive properties. Examples of such groups are given in Tables A6.1 and A6.2 in Appendix 6 of the UN RTDG, Manual of Tests and Criteria". For Meta SPCs 1, 2 and 3 containing only active substance and water, a waiving is acceptable. Meta SPCs 5 and 8 contain formulants as surfactants and they do not satisfy the waiver for chemical group associated with self reactive properties. However, in view of very low concentrations of compounds (maximum 0.5%) and the absence of explosive properties, eCa is of opinion that requesting a	Acceptable for Meta SPC 1, 2 and 3  For Meta SPC 5 and 8, DSC tests (performed on one product of each Meta SPC) are required in post registration to confirm the non classification for self-reactive properties of the products.	C&L inventory (harmonised classificaion)

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	FR Evaluation	Reference
			full test is not appropriate. eCA rather proposes to request a DSC test in post registration to confirm the non classification in this hazard class for those meta-SPCs.		
Pyrophoric liquids	statement		Products in the BPF do not contain components that ignite spontaneously on coming into contact with air at normal temperatures. Products are known to be stable at room temperature for prolonged periods of time (months).	Not relevant.	C&L inventory (harmonised classification)
Pyrophoric solids	waived		Not relevant; all products in the BPF are liquids.	Not relevant	
Self-heating substances and mixtures	statement		Products in the BPF do not contain components that ignite spontaneously on coming into contact with air at normal temperatures. Products are known to be stable at room temperature for prolonged periods of time (months).	Not relevant due to the composition of the family product.	C&L inventory (harmonised classificaion)
Substances and mixtures which in contact with water emit flammable gases	statement		The products are water-based formulations and are known to form stable mixtures with water.	Acceptable	C&L inventory (harmonised classificaion)
Oxidising liquids	statement		For Meta SPC 1, 2 and 3, cross reading to data of the CAR can be made as products are dilutions of active substance solutions.  For Meta SPC 5 and 8, based on the classification of other co-formulants of the biocidal products, none of them were classified as oxidizing.  Moreover, the mixtures are very much diluted as products contain more than 80% water.  Therefore, they are not classified for oxidising liquids.	According to the CAR (confirmatory data peer reviewed in 2018), solutions of NaClO (25.3%) are not considered as oxidizing liquid. Additionally, other constituents are not classified. Consequently, products of the	C&L inventory (harmonised classificaion)

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results		FR Evaluation	Reference
					family do not possess oxidizing properties.	
Oxidising solids	waived				Not relevant as products are liquids	
Organic peroxides	waived		Not relevant, no organ the products of the BP	ic peroxides present in F.	Not relevant	
Corrosive to metals	UN test C.1	Meta SPC 3 (1.5% sodium hypochlorite)	2 mm thickness aluming were exposed to the tension $55  ^{\circ}\text{C} \pm 1  ^{\circ}\text{C}$ .	•	Acceptable  All products of the family are	P. Padilla, 2021, report 20-914015- 002
			Specimen	Loss of mass (%)	classified as H290.	
			Immersed steel plate	15.02		
			Half way immersed steel plate	9.51		
			Non immersed steel plate	0.67		
			Immersed aluminium plate	5.60		
			Half way immersed aluminium plate	3.06		
			Non immersed aluminium plate	0.05		
			A mass loss of 15.02% completely immersed s at 55°C, exceeding the	steel plate after 7 days		
			Therefore, the test iter Meta Corrosive, catego	m must be classified as ory 1 (H290).		

Property	Guideline and Method	Purity of the test substance (% (w/w)	Results	FR Evaluation	Reference
Auto-ignition temperatures of products (liquids and gases)	EC Method A.15	Fictive mixture containing the maximum concentration of active substance that can be in contact with organic matter (4.9% sodium hypochlorite) and the maximum contenant of organic matter in	Also, localised corrosions were observed on steel plates (immerged and half way immerged) but their depths were not measured as the recorded mass loss alone allows to draw the final conclusion.  Since all other formulations of the family are more concentrated in active substance, which is corrosive to metals, it can be concluded that all products of the family are classified as H290.  No auto-ignition was observed up to 600.0 °C.	Acceptable	P. Padilla, 2021, report 20-914015- 003
Relative self-ignition temperature for solids	waived	the family.	Not relevant; all products in the BPF are liquids.	Not relevant	
Dust explosion hazard	waived		Not relevant; all products in the BPF are liquids.	Not relevant	

### Conclusion on the physical hazards and respective characteristics of the product

The products are neither flammable nor auto-flammable. They have no explosive and no oxidizing properties. All the products of the family are classified as corrosive to metals (H290).

For Meta SPC 5 and 8, DSC tests (performed on one product of each Meta SPC) are required in post registration to confirm the non classification for self-reactive properties of the products.

Implication concerning labelling: H290 Met Corr. 1

#### 2.2.4 Methods for detection and identification

Analytical methods were developed for the analysis of the active substance active chlorine and its impurity chlorate in the formulations of the family. Both methods were validated (according to the SANCO/3030/99 rev. 5 guideline) on each representative product used in the stability studies.

#### Method of analysis for active chlorine

When potassium iodide is added to a sample that has active chlorine at an acidic pH, iodine and chloride are released in direct proportion to the amount of active chlorine in the sample.

$$OCl^{-} + 2 I^{-} + 2 H_{3}O^{+} --> I_{2} + Cl^{-} + 3 H_{2}O$$

First, aqueous volumes of the test substance are prepared and chloride was quantified by ion chromatography and conductivity detection (native chloride).

IC Metrohm 761 Compact IC with conductivity detector
Column Metrosep A SUPP 1 250 mm x 4.6 mm x 7 μm (Metrohm)

Mobile phase 3 mM Na2CO3 in water

Flow 1.0 mL/min
Temperature Ambient
Injection volume 20 µL

Retention time Chloride 6 min

Total run time 15 min

Active chlorine is then converted to chloride: the solutions are acidified with 0.1% acetic acid, and then added with 0.5% of a 3.33% w/v Potassium iodide solution (50  $\mu$ L of KI solution + 10  $\mu$ L of acetic acid for 10 mL of test substance aqueous solution). Released iodine is then extracted with 10% v/v of n-heptane (1 mL for 10 mL of test substance aqueous solution).

The resulting solutions are then again assessed for chloride concentration (Total chloride).

Active chlorine = 2 \* (Total chloride - native chloride)

#### Method of analysis for chlorate

Chlorate is assessed by LC-MS and external calibration.

HPLC	Agilent 1100 System
MS detector	Agilent G6120B
Column	Jupiter Proteo 250 x 4.6 mm, 4 µm (Phenomenex)
Mobile phase	75% NH4OH 50 mM
	25% Acetonitrile
Flow	0.7 mL/min
Temperature	25°C
Injection volume	20 μL

Interface	API-ES in negative ion mode, m/z = 67.0, 69.0, 83.0 and 85.0 Heated nebulizer at 325 °C Drying gas 10.0 L/min Nebulizer pressure 40 psig VCap 3000 V
Retention time	2.5 min
Total run time	5.0 min

## **Methods validation results**

Analyte (type of	Analytical	Fortification	Linearity	Specificity	Recovery rate (%)			Limit of	Reference
analyte e.g. active substance)	method	range / Number of measurements			Range	Mean	RSD	quantification (LOQ) or other limits	
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 1.86% w/w (n=2)	The linearity was validated on the range 0.03 – 10 mg/L (n=9)	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from	99.6-100.7 99.9-100.4	100.2	0.78		E. Servajea 2020, repo 20-30-009 ES Part 1
		Level 2: 2.87% w/w (n=2)  Precision: 6 working solutions prepared	log(chloride, mg/L) = 0.967*log(Area) - 0.895 r <sup>2</sup> =99.99%	active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride standard, native chloride in the test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.	25.94-27.21 g/kg	26.7 g/kg	1.80		
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.41 g/kg (n=2) Level 2: 0.57 g/kg (n=2)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8) log(chlorate, mg/L) =	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.  The blank matrix was assessed at more than 100x the concentration used for the test substance	95.2-96.9 97.4-97.5	96.1 97.5	0.073	LOQ = 0.003 mg chlorate/L (n=5)	E. Servajea 2020, repo 20-30-009 ES Part 1
		Precision: Level 1: 5 mg of test item/L (0.0044 mg chlorate/L)	1.027*log(Area) - 5.770 r <sup>2</sup> = 99.97%	working solutions. No interfering peak area was observed at the retention time of chlorate.  Mass spectrum and chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	0.82-0.88 g/kg	0.85 g/kg	2.55		
		Level 2: 50 mg of test item/L			0.83-0.88 g/kg	0.87 g/kg	2.09		

(0.045 mg chlorate/L)				
Level 3: 500 mg of test item/L (0.45 mg chlorate/L)	0.85-0.88 g/kg	0.86 g/kg	1.29	
6 working solutions prepared				

## Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 2 (10.08% sodiu hypochlorite)

Analyte (type of	Analytical	Fortification	Linearity	Specificity	Recovery rat	te (%)		Limit of	Reference
analyte e.g. active substance)	method	of measurements			Range	Mean	RSD	quantification (LOQ) or other limits	
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 4.98% w/w  Level 2: 7.12% w/w  Precision: 6 working solutions prepared	The linearity was validated on the range 0.03 – 10 mg/L (n=9)  log(chloride, mg/L) = 0.967*log(Area) – 0.895  r²=99.99%	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride standard, native chloride in the test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.	99.1-101.0 100.3-101.4 97.97-99.93 g/kg	100.1 100.9 98.7 g/kg	1.34 0.77 0.77		E. Servajea 2020, repo 20-30-016 ES Part 1
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.34 g/kg (n=2)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8)	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.  The blank matrix was assessed at more than 100x the concentration	97.7-98.7	98.2	1.02	LOQ = 0.003 mg chlorate/L (n=5)	E. Servajea 2020, repo 20-30-016 ES Part 1

	Level 2: 0.49 g/kg (n=2)  Precision: Level 1: 2.35 mg of test item/L	log(chlorate, mg/L) = 1.027*log(Area) - 5.770 r <sup>2</sup> = 99.97%	used for the test substance working solutions. No interfering peak area was observed at the retention time of chlorate. Mass spectrum and chromatograms of a chlorate standard, blank solvent and blank matrix have been	6.77-7.10 g/kg	6.94 g/kg	1.76	
	(0.016 mg chlorate/L)  Level 2: 23.5 mg of test item/L		provided.	7.04-7.42 g/kg	7.25 g/kg	1.94	
	(0.17 mg chlorate/L) Level 3: 95 mg of test item/L (0.65 mg chlorate/L)			6.84-7.13 g/kg	6.94 g/kg	1.50	
	6 working solutions prepared						

## Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 2 (13.125% sodius) hypochlorite)

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Analyte (type of analyte e.g. active substance)	Analytical	Fortification	Linearity	Specificity	Recovery rate (%)			Limit of	Reference
		range / Number of measurements			Range	Mean	RSD	quantification (LOQ) or other limits	
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 2.02% w/w (n=2) Level 2: 2.84% w/w (n=2)	The linearity was validated on the range 0.03 – 20 mg/L (n=10)  log(chloride, mg/L) =	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride	99.1-101.3	100.5	1.56		E. Servaje 2021, repo 20-30-047 ES Part 1

		Precision:  6 working solutions prepared	1.000*log(Area) + 0.680 r <sup>2</sup> =99.97%	standard, native chloride in the test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.	122.04- 125.03 g/kg	123.5 g/kg	0.86		
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.85 g/kg (n=2)  Level 2: 1.7 g/kg (n=2)  Precision: Level 1: 2.4 mg of test item/L (0.005 mg chlorate/L)  Level 2: 12 mg of test item/L (0.025 mg chlorate/L)  Level 3: 60 mg of test item/L (0.123 mg chlorate/L)  6 working solutions preparedfor each level	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8)  log(chlorate, mg/L) = 1.056*log(Area) – 5.869  r² = 99.98%	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.  The blank matrix was assessed at more than 5x the concentration used for the test substance working solutions. No interfering peak area was observed at the retention time of chlorate.  Chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	97.1-101.2 102.3-102.3 1.94-2.06 g/kg 1.94-2.07 g/kg 1.99-2.05 g/kg	99.2 102.3 2.02 g/kg 2.02 g/kg	2.9 0 2.11 2.37	LOQ = 0.007 mg chlorate/L or 0.6 g/kg (n=5)	E. Servaje. 2021, repo 20-30-047 ES Part 1

## Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 2 (15.225% sodiu hypochlorite)

Analyte (type of	Analytical	Fortification	Linearity	Specificity	Recovery rat	te (%)		Limit of	Referenc
analyte e.g. active substance)	method range / Number of measurements			Range	Mean	RSD	quantification (LOQ) or other limits		
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 1.91% w/w (n=2)  Level 2: 2.42% w/w (n=2)  Precision: 6 working solutions prepared	The linearity was validated on the range 0.03 – 20 mg/L (n=10)  log(chloride, mg/L) = 1.000*log(Area) + 0.680  r²=99.97%	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride standard, native chloride in the test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.	99.9-100.1 100.5-101.3 145.85- 149.44 g/kg	100.0 100.9 147.1 g/kg	0.14		E. Servaje 2021, repo 20-30-042 ES Part 1
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.85 g/kg (n=2)  Level 2: 1.7 g/kg (n=2)  Precision: Level 1: 2.4 mg of test item/L (0.006 mg chlorate/L)  Level 2: 12 mg of test item/L (0.028 mg chlorate/L)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8) log(chlorate, mg/L) = 1.056*log(Area) – 5.869 r <sup>2</sup> = 99.98%	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.  The blank matrix was assessed at more than 5x the concentration used for the test substance working solutions. No interfering peak area was observed at the retention time of chlorate. Chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	99.2-100.5 99.9-100.5 2.39-2.49 g/kg 2.33-2.50 g/kg	99.9 100.2 2.43 g/kg	0.92 0.42 1.45	LOQ = 0.007 mg chlorate/L (n=5)	E. Servaje 2021, repo 20-30-042 ES Part 1

Level 3: test item (0.144 m chlorate/	ng	2.39-2.54 g/kg	2.45 g/kg	2.16	
6 working solutions prepared level					

## Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 3 (1.575% sodiu hypochlorite)

Analyte (type of	Analytical	Fortification	Linearity	Specificity	Recovery ra	te (%)		Limit of	Reference
analyte e.g. active substance)	method range / Number of measurements		Range	Mean	RSD	quantification (LOQ) or other limits			
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 1.08% w/w (n=2) Level 2: 1.86%	The linearity was validated on the range 0.03 – 10 mg/L (n=9)	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into	98.7-101.2	100.0	0.28		E. Servajea 2020, repo 20-30-017 ES Part 1
		w/w (n=2)  Precision:  6 working	log(chloride, mg/L) = 0.967*log(Area) - 0.895 r <sup>2</sup> =99.99%	account for active chlorine concentration determination. Chromatograms of a chloride standard, native chloride in the test substance, total chloride in the test substance, blank solvent	15.2-16.17	15.5	2.45		
		solutions prepared	17-99.9970	and blank matrix have been provided.	g/kg	g/kg			
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.24 g/kg (n=2)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8)	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.	95.2-96.1	95.7	0.67	LOQ = 0.003 mg chlorate/L (n=5)	E. Servajea 2020, repo 20-30-017 ES Part 1
		Level 2: 0.38 g/kg (n=2)	log(chlorate, mg/L) =	The blank matrix was assessed at more than 100x the concentration used for the test substance	102-103.1	102.6	0.76		

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	Precision: Level 1: 10 mg of test item/L (0.005 mg chlorate/L)	1.027*log(Area) - 5.770 r <sup>2</sup> = 99.97%	working solutions. No interfering peak area was observed at the retention time of chlorate. Mass spectrum and chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	0.46-0.5 g/kg	0.48 g/kg	3.44		
	Level 2: 100 mg of test item/L (0.05 mg chlorate/L)			0.47-0.51 g/kg	0.48 g/kg	2.98		
	Level 3: 1000 mg of test item/L (0.49 mg chlorate/L)			0.47-0.51 g/kg	0.48 g/kg	3.37		
	6 working solutions prepared for eache level							

# Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 5 (5.145% sodiu hypochlorite)

Analyte (type of analyte e.g. active substance)	Analytical method	Fortification range / Number of measurements	Linearity	Specificity	Recovery rate (%)			Limit of	Reference	
					Range	Mean	RSD	quantification (LOQ) or other limits		
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 4.04% w/w (n=2) Level 2: 5.86%	The linearity was validated on the range 0.03 – 10 mg/L (n=9)	of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride	99-100.3 98.7-101.1	99.7	1.63		E. Servajea 2020, repo 20-30-019 ES Part 1	
		w/w (n=2)	log(chloride, mg/L) = 0.967*log(Area) - 0.895		47.02-49.76 48.2 g/kg	1.98				

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		6 working solutions prepared	r <sup>2</sup> =99.99%	test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.					
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.37 g/kg (n=2)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8)	Selectivity and specificity were insured by selecting representative ions $m/z = 67.0$ , 69.0, 83.0 and 85.0.	97.9-98.0	98.0	0.072	LOQ = 0.003 mg chlorate/L (=5)	E. Servajea 2020, repo 20-30-019 ES Part 1
		Level 2: 0.54 g/kg (n=2)  Precision:	log(chlorate, mg/L) = 1.027*log(Area) - 5.770 r <sup>2</sup> = 99.97%	The blank matrix was assessed at more than 100x the concentration used for the test substance working solutions. No interfering peak area was observed at the retention time of chlorate. Mass spectrum and chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	97.4-97.7	97.6	0.22		
		Level 1: 3.25 mg of test item/L (0.008 mg chlorate/L)			2.41-2.47 g/kg	2.45 g/kg	1.01		
		Level 2: 32.5 mg of test item/L (0.082 mg chlorate/L)			2.45-2.65 g/kg	2.52 g/kg	2.98		
		Level 3: 162.5 mg of test item/L (0.4 mg chlorate/L)			2.42-2.57 g/kg	2.47 g/kg	2.24		
		6 working solutions prepared for each level							

# Analytical methods for the analysis of the product as such including the active substance, impurities and residues – Meta SPC 8 (2.73% sodiur hypochlorite)

Analyte (type of	Analytical	Fortification range / Number of measurements	Linearity	Specificity	Recovery rat	te (%)		Limit of	Reference
analyte e.g. active substance)	method				Range	Mean	RSD	quantification (LOQ) or other limits	
Active chlorine (active substance)	IC with conductivity detection (see above)	Recovery: Level 1: 1.86% w/w (n=2)  Level 2: 2.87% w/w (n=2)  Precision:  6 working solutions prepared	The linearity was validated on the range 0.03 – 10 mg/L (n=9)  log(chloride, mg/L) = 0.967*log(Area) – 0.895  r²=99.99%	The method deduces the content of native chloride ions from the total content after transformation of active chlorine into chloride. Hence, only the ions coming from active chlorine are taken into account for active chlorine concentration determination. Chromatograms of a chloride standard, native chloride in the test substance, total chloride in the test substance, blank solvent and blank matrix have been provided.	98.4-101.5 101.2-101.3 26.6-27.82 g/kg	100.0 101.3 27.0 g/kg	<ul><li>2.19</li><li>0.07</li><li>1.56</li></ul>		E. Servajea 2020, repo 20-30-021 ES Part 1
Chlorate (impurity)	LC-MS (see above)	Recovery: Level 1: 0.41 g/kg (n=2)  Level 2: 0.61 g/kg (n=2)  Precision: Level 1: 5 mg of test item/L (0.004 mg chlorate/L)  Level 2: 50 mg of test item/L (0.044 mg chlorate/L)	The linearity was validated on the range 0.003 – 0.70 mg/L (n=8)  log(chlorate, mg/L) = 1.027*log(Area) – 5.770  r <sup>2</sup> = 99.97%	Selectivity and specificity were insured by selecting representative ions m/z = 67.0, 69.0, 83.0 and 85.0.  The blank matrix was assessed at more than 100x the concentration used for the test substance working solutions. No interfering peak area was observed at the retention time of chlorate. Mass spectrum and chromatograms of a chlorate standard, blank solvent and blank matrix have been provided.	105.1-105.5 105.3-105.5 0.76-0.81 g/kg 0.82-0.87 g/kg	105.3 105.4 0.78 g/kg	0.27 0.13 2.68	LOQ = 0.003 mg chlorate/L (n=5)	E. Servajea 2020, repo 20-30-021 ES Part 1

<fr></fr>	<biocidal i<="" th=""><th>PRODUCT FAMIL HYPOCHLOR</th><th>Y BASED ON SODIUI ITE&gt;</th><th>JM <pt 2,="" 4=""></pt></th><th></th></biocidal>	PRODUCT FAMIL HYPOCHLOR	Y BASED ON SODIUI ITE>	JM <pt 2,="" 4=""></pt>	
				T	

Level 3: 500 mg of test item/L (0.44 mg chlorate/L)		0.84 g/kg	1.46	
6 working solutions prepared for eache level				

#### **Analytical methods for soil**

Residue definition: HCIO/CIO-

Not required. For none of the intended uses, soil is the first receiving compartment. Environmental exposure is expected via the facility drain into the STP or via the treated effluent directly into the surface water. Active chlorine (HClO/ClO—) can reach the soil compartment only indirectly, via sewage sludge: rapid degradation occurs already with organic matter therein. In the event of contamination of soil, e.g. due to direct application of chlorinated water, hypochlorous acid/hypochlorite anion would react rapidly with organic matter in soil, anyway.

#### Analytical methods for air

Residue definition: Cl2/HClO/ClO-

Hypochlorite is a non-volatile species. Hypochlorous acid is volatile, but according to literature data, the Henry's Law constant is  $\approx 0.1$  Pa m³ mol-1, i.e. volatilization from the aqueous phase is expected to be slow. Furthermore, there are indications that the half-life is only a few hours, i.e. much shorter than the value derived by Atkinson calculation. So occurrence in air is not probable for this species, either.

In PT2, no spray applications are envisaged.

In PT4, spray applications are envisaged, but the spraying is performed at low pressure, in the form of foam or sticky gel.

At the in-use pH values for PT2 and PT4, exposure to gaseous chlorine is not expected, but throughaccidental events (chlorine can be formed and released when the active chlorine equilibrium is shifted to low pHs by strong acids, e.g. by mixing hypochlorite-based solutions with acidic cleaning agents).

In case of an accidental release of chlorine, two analytical methods (3, 4) for the monitoring of chlorine in workplace air are available in the CAR, which allow the determination of chlorine in workplace air in the range 0.3-7.0 mg Cl<sub>2</sub>/m<sub>3</sub>. In principle, the range can be expanded. Though not validated, the two available methods are published methods, so they can still be concluded to be acceptable for the purpose (determination of chlorine in workplace air).

# Analytical methods for drinking water

Residue definition: HCIO/CIO- and relevant metabolite chlorate CIO<sub>3</sub>-

The analytical methods for active chlorine (HClO/ClO\_) as available in the original Euro Chlor dossier are not acceptable, since the validation is not in accordance with the Additional Guidance on TNsG on analytical methods.

Therefore, a fully-validated analytical method for active chlorine residues in drinking water is requested. A fully validated analytical method is also requested for the relevant metabolite chlorate (ClO<sub>3</sub>-).

#### **Analytical methods for residues in surface water**

Residue definition: HCIO/CIO-

Not required. Environmental exposure is expected via the facility drain into the STP or via the treated effluent directly into the surface water, but rapid degradation occurs with organic matter therein. Rapid degradation occurs also with the organic matter in surface water (DT50<sub>Surface water</sub> = 56 min at environmental temperature).

<sup>3</sup> Reference: OSHA Method «Chlorine in Work place Atmosphere» 05.01.83; Smith & Cochran Spectrophotometric determination of Free Chlorine in Air using Sulphamic acid/Tri-iodide procedure - Anal Chem 1986 Vol 58 pp 1591-1592

Reference: OSHA Method «Chlorine in Work place Atmosphere» 05.01.83; NIOSH free chlorine in air
 01.01.75; ISO 7392/2 Water quality – Determination of free and total chlorine Part 2 Colorimetric method using DPD for routine control purposes 15.10.85

#### Analytical methods for animal and human body fluids and tissues

Residue definition: HCIO/CIO-

Not required. Hypochlorous acid/ hypochlorite anion are oxidizing agents and degrade rapidly with organic matter. Besides, due to corrosive properties, systemic toxicity would be secondary to local effects.

Nevertheless, in case of an accidental release of chlorine, the analytical methods available for the monitoring of chlorine in workplace air are meaningful for monitoring human exposure.

# Analytical methods for monitoring of active substances and residues in food and feeding stuff

Residue definition: HCIO/CIO- and relevant metabolite chlorate CIO<sub>3</sub><sup>-</sup> Under PT4, fully-validated analytical methods for residues of both active chlorine (HCIO/CIO-) and the relevant metabolite chlorate (CIO<sub>3</sub><sup>-</sup>) are requested for monitoring purposes in various matrices and for the estimation of human and animal exposure. Nevertheless, active chlorine degrades rapidly in contact with food matrices, hence the request for analytical methods for their residues in food/feeding stuff cannot be met, but for chlorate only.

## Conclusion on the methods for detection and identification of the product

Analytical methods for the detection and identification of the active substance active chlorine and its relevant impurity chlorate have been validated on several formulations of the family.

Analytical methods for monitoring in soil, air, water, body fluids/tissues and food/feed of plant/animal origin are active substance data. The applicant has letters of access to the active substance dossiers.

# 2.2.5 Efficacy against target organisms

#### **2.2.5.1** Function and field of use

MG 01: Disinfectants

PT2: Disinfectants and algaecides not intended for direct application to humans or animals.

PT4: Food and feed area.

The biocidal products family consists of 8 meta-SPCs intended to be used by professional and non-professional users by wiping or spraying, depending on the META SPC.

The biocidal products family is intended to be used as disinfectant for use in Product Type (PT) 2, and 4 for the following applications:

- Disinfection of surfaces by spraying (without mechanical action) PT2 and PT4 Meta SPC 1, 2, 3, 5 and 8
- 2. Disinfection of surfaces by wiping with mop/cloth and bucket (without mechanical action) PT2 and PT4 Meta SPC 1, 2, 5 and 8

#### > NA-MIC minor change application (2022)

The biocidal products family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE (Meta SPC 1, 2, 3, 5 and 8) was initially authorized for disinfection of surfaces by spraying and wiping against bacteria, yeast and fungi (except for Meta SPC 2 and Meta SPC 5) under clean conditions only.

In the frame of the minor change application, the applicant claimed:

- A modification of the conditions of uses: disinfection in dirty conditions (without cleaning of the surfaces prior application)
- An increase of the validated shelf-life for Meta SPC 1 (from 9 to 18 months), Meta SPC 3 (from 9 to 24 months) and Meta SPC 8 (from 9 to 18 months).

# **2.2.5.2** Organisms to be controlled and products, organisms or objects to be protected

The biocidal products are intended to be used for disinfection of hard surfaces against bacteria, yeasts and fungi.

The appliquant claimed also an efficacy against smell generating organisms.

The product family is used for the purpose of the protection of human health.

#### **2.2.5.3** Effects on target organisms, including unacceptable suffering

The products are intended to produce a reduction in the number of viable bacterial cells (bactericidal activity), yeasts (yeasticidal activity) and fungi (fungicidal activity) of relevant test organisms under defined conditions.

#### **2.2.5.4** Mode of action, including time delay

The active substance released from sodium hypochlorite in aqueous solutions is available chlorine.

According to the Assessment Report of the active substance, the hypochlorite ion is in equilibrium with hypochlorous acid (HOCl) and chlorine (sum: active chlorine or available chlorine) depending on the pH value: below pH 4 chlorine is available, in the neutral pH range hypochlorous acid is the predominant species and at pH values higher then 10, the only species present is the hypochlorite ion.

Hypochlorite reacts actively by chlorination of nitrogen with compounds like amino acids. The disinfecting efficiency of hypochlorite aqueous solution is dependent on the available chlorine concentration and decreases with an increase in pH. It is irrelevant whether available chlorine is generated from chlorine gas, calcium hypochlorite or sodium hypochlorite.

Contact times for the different activities claimed are determined in the efficacy tests (see tables below).

The mode of action of available chlorine released from sodium hypochlorite is non-specific. Microorganisms are inactivated by chlorination and oxidative reactions attacking multiple molecular sites on the cell surface as well as the cell interior.

# **2.2.5.5** Efficacy data

# First Application (2022)

## > Tested products:

The biocidal product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE consists of products containing the active substance Sodium Hypochlorite in the range of 1.575 to 15.225 % w/w.

Efficacy studies provided based on EN norms were performed with 3 differents products:

- Product with 2.6% w/v available chlorine (no perfume and no detergent) from Meta-SPC1
- Product with 2.6% w/v available chlorine (with detergent, no perfume) from Meta-SPC8
- Product with 2.6% w/v available chlorine (with detergent and perfume) from Meta SPC8

Perfumes are not expected to influence efficacy. Detergents are expected to increase disinfection efficacy of products in soiled conditions.

Please note that the exact compositions of the tested products are presented in the confidential section of the PAR.

ECA agree with the approach proposed by the applicant to consider the products tested as representative of the family. Indeed, variations of coformulants present in the products are not considered to have a biocidal activity or an influence on the efficacy of the biocidal product family (please refer to the detailed conclusions for each Meta SPC).

#### Tested aged-products

All the efficacy tests have been carried out with fresh representative products.

However, active substance concentration loss between before and after shelf life is expected to be higher than 10% for all products of all meta-SPCs.

According to the Technical Agreements for Biocides (TAB, point 12):

- Efficacy shelf life test should preferably be performed with aged products that have been stored for the complete claimed shelf life.
- In some cases, it is also acceptable when efficacy shelf life tests are performed with fresh product with an active substance concentration comparable to the concentration measured in a stored product after the claimed shelf life. In those cases, a robust justification and/or a clear indication from the physico-chemical assessment is required which explains why age-related changes in co-formulants would not have an effect on efficacy of the aged product, and why reduction in the quantity of active substance would be the only issue to be addressed.

In order to justify the efficacy of all the products within this family at the end of the shelf-life, it was chosen by the applicant to test (P2S2 test) also a sodium hypochlorite solution with a concentration of 1.3% available chlorine, corresponding to the quantity of active substance contained in an artificially aged product when it contained 2.6% of available chlorine at the time of manufacture and after it lost 50% of its active substance content. The tests are performed under dirty conditions against bacteria, yeasts and fungi.

However no robust justification and/or a clear indication from the physico-chemical assessment which explains why age-related changes in co-formulants would not have an effect on efficacy of the aged product. Nevertheless, considering the claimed compositions for each Meta SPC and the kind as well as the % of the co-formulants claimed, we consider that the approach proposed by the applicant is acceptable (please refer to the conclusion of each meta SPC, below for more details on the validated shelf-life).

# > Table of the experimental data:

			·		roduct against target o		ı
Function	Field of use envisaged	Test substance	Test organism(s)	Test method	Test system / concentrations applied / exposure time	Test results: effects	Reference
Disinfection	Hard surfaces - PT2-4	Product with 2.6% available chlorine (no perfume and no detergent) – Meta SPC 1  Product with 2.6% available chlorine (with detergent, no perfume) – Meta SPC 8  Product with 2.6% available chlorine (with detergent and perfume) – Meta SPC 8	Bacteria:  P. aeruginosa, E. coli, S. aureus, E. hirae	EN 1276	Phase 2 step 1 test (suspension test)  Dilution: 0.001% and 1%  Temperature: 20°C  Clean condition: 0,3 g/L bovine serum albumin  Contact time: 5 min  3 replicats/product/test organism  Criteria: at least a 5 log reduction	Bactericidal activity demonstrated at 1 % v/v for all products.	BioPreserv (2020). 19BP280 - EN 1276.  Revision on 30/04/2020 (to correct some deviations from the method: N, Nv/Nv0, A, B,C)  R.I.: 2
Disinfection	Hard surfaces - PT2-4	Product with 2.6% available chlorine (with detergent, no perfume) – Meta SPC 8  Product with 2.6% available chlorine (with	Yeasts: C. albicans  Fungi: A. brasiliensis	EN 1650	Phase 2 step 1 test (suspension test)  Dilution: 0.001% and 1%  Temperature: 20°C  Clean condition: 0,3 g/L bovine serum albumin	Yeasticidal and fungicidal activity demonstrated at 1 % v/v for all products.	BioPreserv (2020). 19BP280 - EN 1650.  Revision on 30/04/2020 (to correct some deviations from the

Disinfection	Hard surfaces	detergent and perfume) – Meta SPC 8	Yeasts:	EN 1650	Contact time: 15 min  3 replicats/product/test organism  Criteria: at least a 4 log reduction  Phase 2 step 1 test	Yeasticidal activity	method: A, B,C) R.I.: 2
	- PT2-4- PT2	2.6% available chlorine (no perfume and no detergent) – Meta SPC 1	C. albicans  Fungi: A. brasiliensis		(suspension test)  Dilution: 0.001% and 1%  Temperature: 20°C  Clean conditions: 0,3 g/L bovine serum albumin  Contact time: 15 min  3 replicats/product/test organism  Criteria: at least a 4 log reduction	demonstrated at 1 % v/v  Fungicidal activity demonstrated at 1 % v/v even if one of the replicats has only 3.8 log reduction.	(2020). 19BP280 - EN 1650. Revision on 30/04/2020 (to correct some deviations from the method: A, B,C) R.I.: 2
Disinfection	Hard surfaces - PT2-4	Product with 2.6% available chlorine (no perfume and no detergent) – Meta SPC 1  Product with 2.6% available	Bacteria: P. aeruginosa, E. coli, S. aureus, E. hirae.  Fungi: A. brasiliensis	EN 13697	Phase 2 step 2 test (surface test)  Dilution: 0.001% and 1%  Temperature: 20°C	Bactericidal and yeasticidal activity demonstrated at 1 % v/v  3 log reduction is not achieved for A. brasiliensis.	BioPreserv (2020). 19BP280 - EN 13697. Revision on 30/04/2020 (to correct some

		chlorine (with detergent, no perfume) – Meta SPC 8  Product with 2.6% available chlorine (with detergent and perfume) – Meta SPC 8	<b>Yeasts:</b> <i>C. albicans</i>		Clean condition: 0,3 g/L bovine serum albumin  Contact time: 5 min for bacteria and 15 min for yeast and fungi  Criteria: at least a 3 log reduction for yeast and fungi and 4 log reduction for bacteria	, ,	deviations from the method: N, Nts) R.I.: 2
Bactericide Yeasticide	Hard surfaces - PT2-4	Solution Hypochlorite de sodium  Available chlorine: 1.3%  Batch: 58-20-001D	Bacteria: P. aeruginosa, E. coli, S. aureus, E. hirae.  Yeasts: C. albicans	EN 13697	Phase 2 step 2 test (surface test)  Dilutions tested: - Bacteria: 0.1, 5, 8, 12 and 15% - Yeasts: 0.1, 5, 8 and 12%  Temperature: 20°C  Dirty condition: 3 g/L bovine serum albumin  Contact time: 5 min  Criteria: at least a 3 log reduction for yeast and fungi and 4 log reduction for bacteria.	Yeasticidal activity demonstrated at 8 % v/v.  Bactericidal efficacy is not demonstrated as 4 log reduction as not reached ( <i>E. hirae</i> ) or deviations are observed for <i>P. aeruginosa</i> ("NC-Nc is not greater than ± 0.3 lg" and "NT-Nc is not greater than ± 0.3 lg "not validated) and for <i>E. coli</i> (not sufficient recovery rate from coupons to reach 4 log reduction).	(2020) SMI.2020.33 8.2 R.I.: 2
Bactericide	Hard surfaces - PT2-4	Solution hypochlorite de sodium	Bacteria: E. coli, E. hirae	EN 13697+A1: 2019	Phase 2 step 2 test (surface test)	Activity against <i>E. coli</i> and <i>E. hirae</i>	

		Available chlorine: 1.3% w/w Batch: 58-20-001F			Contact time: 20 minutes Temperature: 20°C Soiling: dirty conditions (bovine albumin 3 g/L) Surface: stainless steel Concentrations tested:		R.I.: 2 (data are missing for <i>P. aeruginosa</i> , and <i>S. aureus</i> )
					0.1, 30 and 50 % v/v  Criteria: at least a 4 log reduction		
Fungicide	Hard surfaces - PT2-4	Solution Hypochlorite de sodium Available chlorine: 1.3% w/w Batch: 58-20- 001A	Fungi A. brasiliensis	EN 13697+A1: 2019	Phase 2 step 2 test (surface test)  Contact time: 20 minutes Temperature: 20°C  Soiling: dirty conditions (bovine albumin 3 g/L)  Surface: stainless steel  Concentrations tested: 0.1, 30 and 50 % v/v  Criteria: at least a 3 log reduction	Fungicidal effication demonstrated 50 % v/v.	Au C. 2021  No LMM 2021002L  R.I.: 1

#### > Meta SPC 1, META-SPC 2 and META-SPC 3

META-SPC 1 consists of products to be diluted to 30 % v/v (surface disinfection), containing available chlorine at 2.6 % w/v.

META-SPC 2 consists of products to be diluted between 5 and 7.5% v/v (surface disinfection), containing available chlorine in the range of 9.6 to 16 % w/v.

META-SPC 3 consists of ready-to-use products containing available chlorine at 1.5 % w/v.

The product tested (2.6% w/v available chlorine - no perfume and no detergent) is then considered as representative of the claimed composition of the products of the META-SPC 1 (no variations in the claimed compositions) and META-SPC 2 (worst case regarding the claimed composition of the products of the META-SPC 2 (2.6% instead of 9.6% available substance).

For META-SPC 3, concentration of available chlorine (1.5 % w/v) is lesser than the representative product tested. Besides, considering that there is no other coformulants present in the composition and products are used without dilution, eCA agree to consider the results obtained with product with 2.6% w/v available chlorine (no perfume and no detergent) acceptable for META-SPC3 products.

Based on the efficacy data provided:

- bactericidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1276 and EN 13697), at 20°C, with a contact time of 5 minutes with clean conditions (0.3 g/L BSA). In these conditions, bactericidal activity is shown at the in-use concentration of 1 % v/v.
- yeasticidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1650 and EN 13697), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v.
- fungicidal activity is demonstrated in phase 2, step 1 test (EN 1650), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v. Nevertheless, efficacy is not demonstrated int phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA).

Please note that efficacy tests with a product which contains available chlorine at 1.3% w/w have also been submitted, in order to support the shelf life claimed by the applicant (loss of 50% of its active substance content):

- yeasticidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 5 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 8 % v/v.
- fungicidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 20 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 50 % v/v.

However, no bactericidal efficacy has been demonstrated as efficacy against all the mandatory strains (i.e. P. aeruginosa) has not been demonstrated with the product Hypochlorite de sodium at 1.3% w/w available chlorine.

Therefore, as bacteria is a mandatory target organism for the uses claimed, these studies could not be used to support the efficacy at the claimed shelf-life and the efficacy under dirty conditions (without cleaning prior application).

Moreover P2S1 tests with dirty conditions are also missing to support the efficacy without cleaning prior application. Therefore, efficacy under dirty conditions (without cleaning prior application) is not demontrated based on the efficacy data provided.

Note that since the EN 13697 study against fungi is valid and supports the efficacy of available chlorine at 1.3% v/v at 50% v/v, eCA considers that efficacy of the products 2.6% w/v against fungi is demonstrated at the in-use concentration of 25% v/v (TC: 20 minutes), at 20% in clean conditions (0.3 g/L BSA), based on P2S1 and P2S2 tests (worst case) provided.

Regarding the claimed shelf-life for Meta SPC 1 and 3:

- Bactericidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is not demonstrated.
- But bactericidal efficacy with a product at 2.6% available chlorine is demonstrated at 1% v/v (i.e 0.026% active chlorine) which is lower that the claimed in use application rate (after dilution) for Meta SPC 1 (i.e 0.78% active chlorine) and Meta SPC 3 (i.e 1.55% active chlorine). See detailed explanations in the confidential section of the PAR.
- Fungicidal and yeasticidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) are demonstrated in P2S2 tests at an in use application rate lower than claimed.

Therefore, we consider that efficacy data provided are sufficient to support the efficacy after 9 months for Meta SPC1 and Meta SPC 3 which are the maximum shelf life acceptable based on the APCP data provided.

Regarding the claimed shelf-life for Meta SPC 2:

- Bactericidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is not demonstrated.
- But bactericidal efficacy with a product at 2.6% available chlorine is demonstrated at 1% v/v (i.e 0.026% active chlorine) which is lower that the claimed in use application rate (after dilution) for Meta SPC 2 (i.e 0.74% active chlorine). See detailed explanations in the confidential section of the PAR.
- Yeasticidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is demonstrated in P2S2 tests at an in use application rate lower than claimed.

However, the coresponding in use active chlorine after 3 months of storage (i.e 0.525% and 0.580% active chlorine) are lower for fungi than the effective concentration demonstrated in the efficacy studies (i.e. 0.650% active chlorine). Therefore, the efficacy against fungi is not demonstrated after 3 months for Meta SPC 2 and only efficacy against bacteria and yeasts are demonstrated with a shelf-life of 3 months for Meta SPC 2.

#### Meta SPC 5

META-SPC 5 consists of products to be diluted to 15 % v/v (surface disinfection) containing available chlorine at 4.9 % w/v, with a detergent.

The representative product tested with 2.6% w/v available chlorine (no perfume and detergent) is considered as a worst case regarding the claimed composition of the products of the META-SPC 5.

Based on the efficacy data provided:

- bactericidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1276 and EN 13697), at 20°C, with a contact time of 5 minutes with clean conditions (0.3 g/L BSA). In these conditions, bactericidal activity is shown at the in-use concentration of 1 % v/v.
- yeasticidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1650 and EN 13697), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v.

fungicidal activity is demonstrated in phase 2, steps 1 test (EN 1650), at  $20^{\circ}$ C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v. Nevertheless, efficacy is not demonstrated int phase 2, step 2 test (EN 13697), at  $20^{\circ}$ C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA).

Please note that efficacy tests with a product which contains available chlorine at 1.3% w/w have also been submitted, in order to support the shelf life claimed by the applicant (loss of 50% of its active substance content):

- yeasticidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 5 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 8 % v/v.
- fungicidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 20 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 50 % v/v.

However, no bactericidal efficacy has been demonstrated as efficacy against all the mandatory strains (i.e. *P. aeruginosa*) has not been demonstrated with the product Hypochlorite de sodium at 1.3% w/w available chlorine.

Therefore, as bacteria is a mandatory target organism for the uses claimed, these studies could not be used to support the efficacy at the claimed shelf-life and the efficacy under dirty conditions (without cleaning prior application). Moreover P2S1 tests with dirty conditions are also missing to support the efficacy without cleaning prior application. Therefore, efficacy under dirty conditions (without cleaning prior application) is not demontrated based on the efficacy data provided.

Note that since the EN 13697 study against fungi is valid and supports the efficacy of available chlorine at 1.3% w/w at 50% v/v, eCA considers that efficacy of the products 2.6% v/v against fungi is demonstrated at the in-use concentration of 25% v/v (TC: 20% minutes), at 20% in clean conditions (0.3 g/L BSA), based on P2S1 and P2S2 tests (worst case) provided.

#### Regarding the claimed shelf-life:

- Bactericidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is not demonstrated.
- But bactericidal efficacy with a product at 2.6% available chlorine is demonstrated at 1% v/v (i.e 0.026% active chlorine) which is lower that the claimed in use application rate (after dilution) for Meta SPC 5 (i.e 0.723% active chlorine). See detailed explanations in the confidential section of the PAR.
- Yeasticidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is demonstrated in P2S2 tests at an in use application rate lower than claimed.

However, the corresponding in use active chlorine after 8 months of storage (i.e 0.518% active chlorine) is lower for fungi than the effective concentration demonstrated in the efficacy studies (i.e. 0.650% active chlorine). Therefore, the efficacy against fungi is not demonstrated after 8 months for Meta SPC 5 and only efficacy against bacteria and yeasts are demonstrated with a shelf-life of 8 months for Meta SPC 5.

#### Meta SPC 8

META-SPC 8 consists of products to be diluted to 30 % v/v (surface disinfection), containing available chlorine at 2.6 % w/v.

Considering the composition of META-SP8, eCA agreed that the products with 2.6% w/v available chlorine (perfume and detergent) and with 2.6% w/v sodium hypochlorite (no perfume and no detergent) are considered as representative regarding the claimed composition of the products of the META-SPC 8.

Based on the efficacy data provided:

- bactericidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1276 and EN 13697), at 20°C, with a contact time of 5 minutes with clean conditions (0.3 g/L BSA). In these conditions, bactericidal activity is shown at the in-use concentration of 1 % v/v.
- yeasticidal activity is demonstrated both in phase 2, steps 1 and 2 tests (EN 1650 and EN 13697), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v.
- fungicidal activity is demonstrated in phase 2, steps 1 test (EN 1650), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 1 % v/v. Nevertheless, efficacy is not demonstrated int phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 15 minutes with clean conditions (0.3 g/L BSA).

Please note that efficacy tests with a product which contains available chlorine at 1.3% w/w have also been submitted, in order to support the shelf life claimed by the applicant (loss of 50% of its active substance content):

- yeasticidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 5 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 8 % v/v.
- fungicidal activity is demonstrated in phase 2, step 2 test (EN 13697), at 20°C, with a contact time of 20 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 50 % v/v.

However, no bactericidal efficacy has been demonstrated as efficacy against all the mandatory strains (i.e. *P. aeruginosa*) has not been demonstrated with the product Hypochlorite de sodium at 1.3% w/w available chlorine.

Therefore, as bacteria is a mandatory target organism for the uses claimed, these studies could not be used to support the efficacy at the claimed shelf-life and the efficacy under dirty conditions (without cleaning prior application). Moreover P2S1 tests with dirty conditions are also missing to support the efficacy without cleaning prior application. Therefore, efficacy under dirty conditions (without cleaning prior application) is not demontrated based on the efficacy data provided.

Note that since the EN 13697 study against fungi is valid and supports the efficacy of available chlorine at 1.3% w/w at 50% v/v, eCA considers that efficacy of the products 2.6% w/v against fungi is demonstrated at the in-use concentration of 25% v/v (TC: 20 minutes), at 20% in clean conditions (0.3 g/L BSA), based on P2S1 and P2S2 tests (worst case) provided.

Regarding the claimed shelf-life:

- Bactericidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) is not demonstrated.
- But bactericidal efficacy with a product at 2.6% available chlorine is demonstrated at 1% v/v (i.e 0.026% active chlorine) which is lower that the claimed in use application rate (after dilution) for Meta SPC 8 (i.e 0.81% active chlorine). See detailed explanations in the confidential section of the PAR.
- Fugicidal and yeasticidal efficacy with a product at 1.3% available chlorine (loss of 50% of its active substance content) are demonstrated in P2S2 tests are demonstrated in P2S2 tests at an in use application rate lower than claimed.

Therefore, we consider that efficacy data provided are sufficient to support the efficacy after 9 months for Meta SPC8 which is the maximum shelf life acceptable based on the APCP data provided.

#### Conclusion on the efficacy of the product

The product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE has shown a sufficient efficacy, in accordance with the requirements of the guidance on the Biocidal Products Regulation, Volume II Efficacy Parts B+C, for the following uses, at the claimed application rate:

#### **META SPC 1**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C
- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket included (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C

#### **META SPC 2**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

#### **META SPC 3**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 100% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 100% v/v, 20 min, 20 °C

#### **META SPC 5**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

# **META SPC 8**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C

Efficacy under dirty conditions has not been demonstrated.

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C

It has to be noted that following efficacy tests submitted, pre-cleaning has been added and contact time for bacteria, yeasts and fungi have been increased.

Moreover, the applicant claimed also an efficacy against smell generating organisms. The argumentation provided by the applicant was: "Smell generating organisms are bacteria and fungi. As the products have been reported efficient for these organisms, the claim for desodorising is considered relevant".

Nevertheless, as no efficacy data according to the requirements of the Efficacy guidance Vol II Part B/C, section 5.4.0.5.4 were provided, eCA considers that this claim has not been demonstrated.

## > NA-MIC minor change application (2022)

To support the efficacy under dirty conditions and proposed extensions of the shelf-life, new efficacy studies carried out with products with 2.6% w/v available chlorine (with and without detergent) and products with 1.3% w/w available chlorine were submitted by the applicant. The compositions of all tested products are presented in the confidential part of the PAR.

All efficacy studies results are summarized in Section 6.7 of the IUCLID file and the main points are summarized in the table below.

		Experimental data	on the efficac	y of the biocid	al product against target o	rganism(s)	
Function	Field of use envisage d	Test substance	Test organism(s)	Test method	Test system / concentrations applied / exposure time	Test results: effects	Referen ce
Disinfection	Hard surfaces - PT2-4  Bridging tests	Product with 2.6% w/v available chlorine (no perfume and no detergent)  Batch: 47-23-006	P. aeruginosa, E. coli, S. aureus, E. hirae	EN 1276:2019	Phase 2 step 1 test (suspension test)  Dilution: 1%, 3% and 5% v/v  Temperature: 20°C  Dirty condition: 3 g/L bovine serum albumin  Contact time: 20 min  Criteria: at least a 5 log reduction	observed at 3% v/v 4.94 log reduction is observed at 5% v/v.  E. coli: Efficacy demonstrated at 1% v/v.  S. aureus: Efficacy demonstrated at 3% v/v.  E. hirae: Efficacy demonstrated at 1% v/v.  Based on this study, it can be determined that the worst case organism is P. aeruginosa.	LMM, Report n° LMM 2023007 L R.I. = 1
Disinfection	Hard surfaces - PT2-4	Product with 2.6% w/v available chlorine + detergent	Bacteria: P. aeruginosa	EN 1276:2019	Phase 2 step 1 test (suspension test) <u>Dilution:</u> 0.1%, 3% and 5%	P. aeruginosa: Efficacy demonstrated at 3% and 5% v/v.	LMM, Report n° LMM 2023029
	Bridging tests	Batch: 52-23-001A			v/v  Temperature: 20°C	Based on the results obtained of the product without detergent	L R.I. = 2

	Experimental data	on the efficacy of	f the biocidal product against target o	organism(s)	
Disinfection Hard surface PT2-4  Bridg tests	Product with 2.6% aces - w/v available chlorine (no perfume and no detergent)	Yeast: EN	Dirty condition: 3 g/L bovine serum albumin  Contact time: 20 min  Criteria: at least a 5 log reduction	compared to the product with detergent (please refer to the efficacy study above):    3%   5%	

		Experimental data	on the effica	cy of the bioci	dal product against target o	rganism(s)	
					<u>Criteria:</u> at least a 4 log reduction		
Disinfection	Hard surfaces - PT2-4  Bridging tests	Product with 2.6% w/v available chlorine + detergent  Batch: 52-23-001A	Yeast: Candida albicans  Fungi: Aspergillus brasiliensis	EN 1650:2019	Phase 2 step 1 test (suspension test)  Dilution: C. albicans: 0.1%, 0.2% and 1% v/v A. brasilensis: 0.1%, 0.2% and 5% v/v  Temperature: 20°C  Dirty condition: 3 g/L bovine serum albumin  Contact time: 20 min  Criteria: at least a 4 log reduction	No efficacy has been demonstrated for all tested concentrations. At 1% v/v, the log reduction was 3.04.  A.brasiliensis:  No efficacy demonstrated for all tested concentrations. At 5% v/v, the log reduction was 3.48.  Based on the results obtained of the product without detergent compared to the product detergent (performed at the same time, please refer to the efficacy study above):    C.	LMM, Report n° LMM 2023032 L R.I. = 1

Experimental data on the efficacy of th	e biocidal product against target organism(s)
	Product 3.04 3.48 + deterge nt
	Differen 0.09 0.23 ce log log
	Therefore, as the difference is < 1log, according to the guidance Harmonized
	approach to determine a worst-case (or a representative) test product
	to be taken into account for efficacy core assessment for a disinfectant BPF (Dec
	2020, BPC 37), it can be considered that the detergent has no impact on
	the efficacy of the product for yeasts and fungi.

# > Representative tested products:

During the first authorisation of the product family, in order to support the efficacy and to justify the impact of coformulants on the efficacy, efficacy tests have been carried out with 3 different products with 2.6% w/v available chlorine (one with no perfume and no detergent, one with detergent and no perfume, and one with detergent and perfume) and with products with 1.3% w/w available chlorine under clean conditions only. Under these conditions it was considered that these representative products were acceptable to cover the efficacy of the product family.

In the frame this minor change application, in order to justify the worst case test product according to the requirement of the BPC document "Harmonized approach to determine a worst-case (or a representative) test product to be taken into account for efficacy core assessment for a disinfectant BPF » (Dec 2020, BPC-37)" in force, phase 2 step 1 bridging studies should be performed under the hardest conditions claimed in the application (i.e. highest soiling claimed: dirty conditions).

Therefore, the applicant has provided new P2S1 tests in dirty conditions with the products containing 2.6% w/v available chlorine (without and with detergent) to support the non-influence of the coformulants (detergent) on the efficacy under dirty conditions.

Based on the results of these studies, it can be considered that the detergent has no impact on the efficacy of the product also under dirty conditions.

Therefore, efficacy studies carried out with a representative product without detergent are considered as acceptable to support the efficacy for Meta SPC 1, 2, 3, 5 and Meta SPC 8 under dirty conditions. Moreover to take into account the AS loss during shelf life, efficacy studies have been performed with 1.3% w/w available chlorine based product (50% loss).

		Experimental data	on the efficac	y of the biocid	al product against target o	rganism(s)	
Function	Field of use envisage d	Test substance	Test organism(s)	Test method	Test system / concentrations applied / exposure time	Test results: effects	Referen ce
Disinfection	Hard surfaces - PT2-4	Solution Hypochlorite de sodium Available chlorine: 1.3% w/w Batch: 58-22-001A	Bacteria:  P. aeruginosa, E. coli, S. aureus, E. hirae	EN 1276:2019	Phase 2 step 1 test (suspension test)  Dilution: 0.1%, 1%, 15% and 30% v/v  Temperature: 20°C  Dirty condition: 3 g/L bovine serum albumin  Contact time: 20 min  Criteria: at least a 5 log reduction	Bactericidal activity demonstrated at 15 % v/v.	Au C., 2022 Report No. LMM 2022004 L R.I.: 1
Disinfection	Hard surfaces - PT2-4	Solution Hypochlorite de sodium Available chlorine: 1.3% w/w Batch: 58-22-001A	Yeasts: C. albicans  Fungi: A. brasiliensis	EN 1650:2019	Phase 2 step 1 test (suspension test)  Dilution: Yeast: 1%, 4% and 8% v/v Fungi: 1%, 25% and 50% v/v  Temperature: 20°C  Dirty condition: 3 g/L bovine serum albumin  Contact time: 20 min  Criteria: at least a 4 log reduction	Yeasticidal activity demonstrated at 4 % v/v. Fungicidal activity demonstrated at 25 % v/v.	Au C., 2022 Report No. LMM 2022005 L R.I.: 1 See first applicati on for P2S2 test (SMI.202 0.338.2)

Experimental data on the efficacy of the biocidal product against target organism(s)							
Bactericide	Hard	Solution	Bacteria:	EN	Phase 2 step 2 test (surface	Not acceptable to support	Actalia
	surfaces - PT2-4	hypochlorite de sodium	P. aeruginosa	13697+A1: 2019	test)	the efficacy as the criterion of the EN13697 method	(2021)
					Contact time: 5 minutes	"NT-Nc is not greater than	No
		Available chlorine: 1.3% v/v			Temperature: 20°C	± 0.3 lg" is not validated."	SMI.202 0.338.2
					Soiling: dirty conditions	(other mandatory strains	
		Batch: 58-21-002A			(bovine albumin 3 g/L)	have been tested in the tests SMI.2020.338.2	R.I.: 3
					Surface: stainless steel	( <i>S.aureus</i> ) and LMM 2021001L ( <i>E.hirae</i> and	
					Concentrations tested: 0.1,	E.coli), submitted in the	
					8 and 12% v/v	frame of the first application)	
					Criteria: at least a 4 log		
					reduction		

#### > Efficacy in dirty conditions:

Based on the new efficacy data provided, with the representative product at 1.3% w/w available chlorine (without detergent):

- bactericidal activity is demonstrated in phase 2, step 1 test (EN 1276), at 20°C, with a contact time of 20 minutes with dirty conditions (3 g/L BSA). In these conditions, bactericidal activity is shown at the in-use concentration of 15 % v/v. Phase 2 step 2 tests have been submitted during the first authorisation but efficacy has not been demonstrated on *P.aeruginosa*, since basic limit "NT-Nc is not greater than ± 0.3 lg" was not fulfilled.
- Yeasticidal and fungicidal activities are demonstrated both in phase 2, step 1 and step 2 tests (EN 1650 and in the frame of first application EN 13697), at 20°C, with a contact time of 20 minutes with dirty conditions (3 g/L BSA). In these conditions, yeasticidal activity is shown at the in-use concentration of 8% v/v and fungicidal activity is shown at the in-use condition of 50% v/v.

In the frame of the minor change, the applicant has once again provided the test according to EN 13697 on *P.aeruginosa* alone, where the criterion "NT-Nc is not greater than  $\pm$  0.3 lg" is not validated (i.e. 6.19-5.87=0.32).

The applicant has provided the following justifications: "As requested by the EN 13697 standard, NT and Nc values have been rounded to two significant figures. The difference between NT and Nc (NT-Nc) was calculated from these values and rounded to one significant figure to enable the comparison to the limit value of  $\pm 0.3$  lg given with one significant figure. Then NT-Nc equals to 0.3 lg which complies with the EN 13697 requirements".

ECA does not agree with the justifications provided by the applicant. Indeed, as indicated in the standard, the values must be rounded to two significant figures. Therefore, we consider that this rule is also applicable for criteria and then the criterion should be considered as "NT-Nc is not greater than  $\pm$  0.30 lg".

Therefore, eCA still considers that this study is not acceptable to support the efficacy against *P. aeruginosa* under dirty conditions and should be rejected.

As there is no other efficacy studies (P2S2 tests) provided or already included in the dossier to support the efficacy against *P. aeruginosa* (mandatory strain), the bactericidal efficacy under dirty conditions (without cleaning prior application) is not demonstrated.

# > Regarding claims for extended shelf-life

Based on the efficacy data provided and the minimum application rate demonstrated in the efficacy studies, eCA considers that efficacy under clean conditions is demonstrated until 18 months (Meta SPC1 and 8) and 24 months (Meta SPC5) of storage according to the APCP data provided.

Please refer to the detailed explanations in the confidential section of the PAR.

## Conclusion on the efficacy of the product

The elements presented in the dossier are not sufficient to demonstrate the efficacy of the product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE under dirty conditions, in accordance with the requirements of the guidance on the Biocidal Products Regulation, Volume II Efficacy Parts B+C as no acceptable P2S2 test against

bacteria under dirty conditions has been provided. Efficacy assessment supports the shelf-life.

# **2.2.5.6** Occurrence of resistance and resistance management

According to the Assessment Report of Active chlorine released from sodium hypochlorite (January 2017), although different species vary in their sensitivity to active chlorine, development of acquired resistance is not expected since its multiple molecular sites of attack on the surface and within the microbial cells. Active chlorine is in fact regarded by experts [see IFH (International Scientific Forum on Home Hygiene) review October 2003 and Submission to SCENIHR, February 2008)] as one of the biocides where acquired resistance is least likely to develop. For the same reasons cross-resistance is not to be expected, nor has it been observed. Despite its use for almost a century in purifying drinking water, where very low (sub ppm) concentrations are continuously maintained, the development of acquired resistance has not been observed. Adaptation of organisms to hypochlorite can be determined by comparison of the Minimum Inhibitory Concentration (MIC) but this is not relevant in practice as the actual use concentrations are much higher and thus a sufficient margin of safety is provided.

No management strategies are necessary as acquired resistance to active chlorine has not developed nor will develop due to its reactive nature and unspecific mode of action. Some temporary adaptation giving modestly reduced susceptibility is sometimes observed in organisms exposed continuously at low concentrations (e.g. in water pipes through formation of biofilms), but this is readily managed e.g. by control/removal of the biofilm.

To ensure a satisfactory level of efficacy and avoid the development of resistance, the recommendations proposed in the SPC have to be implemented.

#### **2.2.5.7** Known limitations

None.

#### **2.2.5.8** Evaluation of the label claims

# First authorisation (2022)

French competent authorities (FR CA) assessed that product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE have shown a sufficient efficacy in accordance with the requirements of the guidance on the Biocidal Products Regulation, Volume II Efficacy – Assessment and Evaluation (Parts B+C), Version 3.0, April 2018 and EN 14885:2015 standard for the following uses:

## **META SPC 1**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 30% v/v, 20 min, 20 °C
- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket included (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 30 % v/v, 15 min, 20 °C

- Other target organisms:
  - Fungi: 30% v/v, 20 min, 20 °C

#### **META SPC 2**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 0.525% w/w active chlorine, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 3 months (maximum shelf life acceptable based on the APCP assessment) at the claimed in use application rate.

#### **META SPC 3**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 100% v/v, 15 min, 20 °C
  - Other target organisms:
    - Fungi: 100% v/v, 20 min, 20 °C

#### **META SPC 5**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP data provided) at the claimed in use application rate.

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:
    - Bacteria and yeasts: 15 % v/v, 15 min, 20 °C

Efficacy against fungi is not demonstrated for a shelf-life of 8 months (maximum shelf life acceptable based on the APCP data provided) at the claimed in use application rate.

#### **META SPC 8**

- Use 1: Disinfection of surfaces by spraying (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:

Bacteria and yeasts: 30 % v/v, 15 min, 20 °C

Other target organisms:

• Fungi: 30% v/v, 20 min, 20 °C

- Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT 2 and PT 4) under clean conditions:
  - Mandatory target organisms:

• Bacteria and yeasts: 30 % v/v, 15 min, 20 °C

Other target organisms:

• Fungi: 30% v/v, 20 min, 20 °C

It has to be noted that following efficacy tests submitted, pre-cleaning has been added and contact time for bacteria, yeasts and fungi have been increased.

Moreover, the appliquant claimed also an efficacy against smell generating organisms. The argumentation provided by the applicant was: "Smell generating organisms are bacteria and fungi. As the products have been reported efficient for these organisms, the claim for desodorising is considered relevant.". Nevertheless, as no efficacy data according to the requirements of the Efficacy guidance Vol II Part B/C, section 5.4.0.5.4 were provided, eCA consider that this claim has not been demonstrated.

## > NA-MIC minor change application (2022)

Refer to first application (in the frame of MIC, efficacy in dirty conditions have not been validated).

**2.2.5.9** Relevant information if the product is intended to be authorised for use with other biocidal product(s)

none

#### 2.2.6 Risk assessment for human health

The Assessment Reports for Active Chlorine released from sodium hypochlorite (PT2 and PT4, Italy, January 2017) state that sodium hypochlorite dissociates in water to form the sodium cation (Na<sup>+</sup>) and hypochlorite anion (ClO<sup>-</sup>), which is characterised by its well-known irritating/corrosive effects. Hypochlorite is in equilibrium of hypochlorous acid (HClO) and chlorine (Cl<sub>2</sub>). The remaining sodium cation is a physiologically essential element and required in intermediary metabolism. During BPC TO-WGIII-2016, the members agreed that human health effects are primarily due to the local mode of action of sodium hypochlorite and potential systemic effects are secondary to its direct irritating reactivity.

Sodium chlorate is a relevant impurity of the active substance Sodium hypochlorite and can also be formed during the storage of the product.

For each Meta-SPC, the long-term stability test (please refer to the Physical, Chemical and technical part) shows a content of sodium chlorate at final time (expressed as % of active chlorine content) above the specification limit for sodium chlorate, which is of maximum 5.4% w/w of available chlorine.

As chlorate presents an acute toxicity by oral route (harmonised classification Acute Tox. 4 – H302), it is not covered by the toxicity of the active substance. Therefore, the content of sodium chlorate at final time of the stability study will be taken into account for the classification of the different meta-SPC.

Moreover the presence of chlorate should also be taken into account to perform a systemic risk assessment. However, in the absence of harmonisation of the reference values for chlorate, no risk assessment can be performed. This should be addressed at the renewal of the active substance.

#### **2.2.6.1** Assessment of effects on Human Health

With the exception of *in-vitro* skin corrosion test conducted with "Afise Javel 2.6" covering products of meta-SPC 1 and 3, no data are available on the products.

Classification is addressed based on available information on the active substance and coformulants, according to the guidance of the CLP Regulation (EC No 1272/2008).

#### Skin corrosion and irritation

#### Meta-SPC 1 and 3

Summary table of in vitro studies on skin corrosion/irritation					
Method, Guide line, GLP status, Reliability	Test substance, Doses	Relevant information about the study	Results	Remarks (e.g. major deviations)	Reference
In vitro Membrane Barrier Test Method for Skin Corrosion,	Test item name : "AFISE JAVEL 2.6" (Batch	Performed according to the Corrositex® Method	The test was performed following 3 steps.  Step 1 – Compatibility test: confirmed by a color change (from yellow to	A deviation (Dev 120/14) has been recorded in order to define	Faccioli F. (2014) Final report : S- 2014-

Summary table of in vitro studies on skin corrosion/irritation					
OECD Guideline 435 (July 2015), GLP compliance, Reliability: 1	LAB2014-14)  4 replicates – 500µl of test item  Negative control: Citric acid 10%  Positive control: sodium hydroxide 50% and sulfuric acid 10%		purple)  Step 2 - Timescale Category test: First trial: not conclusive Confirmation test: liquid turned into a slight grey coloration → assignment to Category 2  Step 3 - Measurement of membrane barrier penetration: No disruption of the membrane before 60 min (4 replicates)  Negative control: no disruption of the membrane before 1 hour  Positive control: disruption of the membrane after 11 min 40 sec and 13 min 35 sec  Conclusion: According to the OECD 435 guideline and GHS criteria, the test item is not corrosive to skin.	a new preparation of bio-barrier because the negative control was reacted within 60 minutes, and the step 3 of experimentatio n was repeated → deviation not critical	01731 AMi

Conclusion used in F	Conclusion used in Risk Assessment - Skin corrosion and irritation				
Value/conclusion	Irritating to skin				
Justification for the value/conclusion	The <i>in-vitro</i> skin corrosion (CORROSITEX®) assay performed on the product "Afise Javel 2.6" confirmed that the product is not corrosive to skin.  The active substance content in this product is between 1 and 5% in the mixture. Therefore, a classification as Category 2 Skin Irritant is required for this product, according to the specific concentration limit of the active substance and CLP Regulation.				
	Products of meta-SPC 1 and 3 are water-based formulations with the active substance at maximum 2.6% w/w as the only component. Therefore the product "Afise Javel 2.6" tested for the assay is representative of the products of meta-SPC 1 and 3 and the results of the test can be extrapolated to them.				

Classification of the	The meta-SPC 1 anc 3 are classified as Skin Irritant 2; H315,
product according to	according to the CLP criteria.
CLP	

# Meta-SPC 2, 5 and 8

Conclusion used in F	Conclusion used in Risk Assessment – Skin corrosion and irritation				
Value/conclusion	Corrosive to skin				
Justification for the value/conclusion	Taking into account the extreme pH of the formulations (> 11.5), products from meta-SPC 2, 5 and 8 are considered corrosive to the skin according to the CLP criteria.				
Classification of the product according to CLP	The meta-SPC 2, 5 and 8 are classified as Skin Corrosive 1; H314.				

# Eye irritation

No *in-vitro* data or *in-vivo* data on eye damage/irritation is available for the biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE. Classification of the products from the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE is performed according to the calculation rules laid down in the CLP regulation.

#### Meta-SPC 1 and 3

<b>Conclusion used in F</b>	Conclusion used in Risk Assessment – Eye irritation				
Value/conclusion	Causes eye irritation				
Justification for the value/conclusion	The products of meta-SPC 1 and 3 are classified Skin Irritant Cat 2 (H315) following an <i>in vitro</i> skin corrosion test (CORROSITEX®). This classification no longer involve an automatic classification as Eye damaging (H318), as it is the case when the products are classified Skin corrosive (H314). Therefore, the classification for eye damage/irritation for the products of meta-SPC 1 and 3 is determined using the Specific Concentration Limits established for this substance. These SPC prevail over a classification using the pH, as pH has already been taken into consideration when the SPC have been derived for the active substance into water.  The products of meta-SPC 1 and 3 contain only the active substance into water, at a concentration between 1 and 3%, which leads to a classification as Category 2 Eye Irritant (H319).				
Classification of the product according to CLP	The products of meta-SPC 1 and 3 are classified Eye Irrit. 2; H319, according to the CLP criteria.				

# Meta-SPC 2, 5 and 8

Conclusion used in Risk Assessment – Eye irritation				
Value/conclusion	Causes eye damage			

Justification for the value/conclusion	The pH is above 11.5 for the products of meta-SPC 2, 5 and 8 and therefore these products are proposed to be classified Category 1
	Eye Damaging, according to the CLP Regulation.
Classification of the product according to CLP	The products of meta-SPC 2, 5 and 8 are classified Eye Dam 1; H318, according to the CLP criteria.

# Respiratory tract irritation

# Meta-SPC 1 and 3

Conclusion	n used in the Risk Assessment – Respiratory tract irritation
Justification for the conclusion	The active substance is not classified as a respiratory tract irritant.  The PT2 and PT4 Assessment Reports for Active chlorine released from sodium hypochlorite (January 2017) note that sodium hypochlorite aerosols may be irritant to the respiratory tract.  According to the Guidance on the Application of the CLP Criteria, a classification for corrosivity is considered to implicitly cover the potential to cause respiratory tract irritation. However, products of meta-SPC 1 and 3 are not classified as Skin corrosive and therefore they are not considered as Respiratory tract irritant.
Classification of the product according to CLP	No classification required.

# Meta-SPC 2, 5 and 8

Conclusion	used in the Risk Assessment – Respiratory tract irritation
Justification for the conclusion	The active substance is not classified as a respiratory tract irritant.  The PT2 and PT4 Assessment Reports for Active chlorine released from sodium hypochlorite (January 2017) note that sodium hypochlorite aerosols may be irritant to the respiratory tract.  According to the Guidance on the Application of the CLP Critaria, a classification for corrosivity is considered to implicitly cover the potential to cause respiratory tract irritation. Additional classification for Respiratory tract irritation is not required.  However, as products of meta-SPC 2, 5 and 8 are classified as Skin corrosive (H314) and used for spraying application, the mention EUH071: corrosive to the respiratory tract is required and a qualitative risk assessment is performed.
Classification of the product according to CLP	No classification required but the mention EUH071: corrosive to the respiratory tract is required.

# Skin sensitization

Conclusion used in Risk Assessment – Skin sensitisation				
Value/conclusion	onclusion Not sensitizing to the skin			
Justification for the	Based on intrinsic properties of individual components of the			
value/conclusion	biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON			

	SODIUM HYPOCHLORITE, none of the components is classified for skin sensitizing properties.
Classification of the	No classification required
product according to	
CLP	

# Respiratory sensitization (ADS)

Conclusion used in Risk Assessment – Respiratory sensitisation	
Value/conclusion	Not sensitizing to the respiratory tract
Justification for the value/conclusion	Based on intrinsic properties of individual components of the biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE. None of the components is classified for respiratory sensitizing properties.
Classification of the product according to CLP	No classification required

#### Acute toxicity

No data on acute toxicity by oral, dermal and inhalation route is available for the biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE. The classification of the products has been performed according to the calculation rules laid down in the CLP regulation.

#### Acute toxicity by oral route

Value used in the	e Risk Assessment – Acute oral toxicity
Value	No acutely toxic via the oral route
Justification for the selected value	Based on intrinsic properties of individual components of the biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE. For details on the calculations, please refer to the confidential PAR.
Classification of the product according to CLP	No classification required

#### Acute toxicity by inhalation

Value used in th	e Risk Assessment – Acute inhalation toxicity
Value	No acutely toxic via the inhalation route
Justification for	Based on intrinsic properties of individual components of the biocidal
the selected	products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM
value	HYPOCHLORITE. None of the components is classified for acute
	inhalation toxicity properties.
Classification of	No classification required
the product	
according to CLP	

#### Acute toxicity by dermal route

Value used in th	e Risk Assessment – Acute dermal toxicity
Value	Not acutely toxic via dermal route
Justification for the selected value	Based on intrinsic properties of individual components of the biocidal products in the BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE. None of the components is classified for acute dermal toxicity properties.
Classification of the product according to CLP	No classification required

### Information on dermal absorption

Value(s) used in	the Risk Assessment – Dermal absorption
Substance	Sodium hypochlorite
Value(s)*	Not relevant
Justification for	Local mode of action: skin corrosion/irritation and oxidization at the
the selected	site of first contact
value(s)	

Data waiving	
Information	Annex III of Regulation 5EC) No. 528/2012 (BPR), point 8.6 "Dermal
requirement	absorption"
Justification	With respect to the biocidal products in BPF BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE, dermal absorption is not considered relevant. Toxicity of the biocidal products is characterised by active substance releaser sodium hypochlorite, which acts by a local
	mode of action due to direct chemical reactivity.

In the absence of clear systemic effects, dermal absorption values were
not deemed necessary; a default value of 100% was set in the "Active
chlorine released from sodium hypochlorite Assessment Report"
(Sodium hypochlorite in PT2-5, Italy, 2017).

# Available toxicological data relating to non active substance(s) (i.e. substance(s) of concern)

None of the co-formulants meet the criteria and therefore no substances of concern are identified for the products in the biocidal product family.

#### Available toxicological data relating to a mixture

#### Other

#### NA-MIC minor change application (2022)

The minor change regarding the extension of the shelf-life for Meta-SPCs 1, 3 and 8 induces an increase of the sodium chlorate concentration at final time in these Meta-SPCs.

To be noted that the recently adopted RAC opinion (10 June 2021) agreed that sodium chlorate should be classified as Acute Tox 3; H301, adding an ATE = 100 mg/kg bw by using the converted Acute Toxicity point Estimate (cAtpE) for category 3 based on human case reports.

These new concentrations and ATE have been used to perform the classification according to the classification rules (see Confidential annex).

These changes have no impact on the classification of the meta-SPCs and the identification of substances of concern.

#### **2.2.6.2** Exposure assessment and risk characterisation

The biocidal product family BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE contains five Meta SPC described here below:

- Meta SPC 1 with products that contain 2.6% avCl. All disinfectants products of Meta SPC 1 are liquid formulations to be diluted.
- Meta SPC 2 with products that contain max 14.5% avCl. All disinfectants products of Meta SPC 2 are liquid formulations to be diluted.
- Meta SPC 3 with products that contain max 1.5% avCl. All disinfectants products of Meta SPC 3 are ready to use liquid formulations.
- Meta-SPC 5 with products that contain max 4.9% avCl. All disinfectants products of Meta SPC 5 are liquid formulations to be diluted.
- Meta-SPC 8 with products that contain max 2.6% avCl. All disinfectants products of Meta SPC 8 are liquid formulations to be diluted.

These products are intended for professional and non-professional users.

All the uses of the biocidal product family are summarized for each Meta SPC in the table below.

Table 1: Uses and scenarios summary developed in the exposure assessment

Product type	Uses	Scenarios	Meta SPC
PT02 PT04	Use 1: Disinfection of surface by spraying indoor	Application by spraying	Meta SPC 1, 2, 3, 5 and 8
	Use 2: Disinfection of surfaces by wiping with mop / cloth and bucket indoor	Application by wiping with mop / cloth and bucket	Meta SPC 1, 2, 5 and 8

The active substance releaser Sodium hypochlorite is characterised by primarily local effects (i.e corrosion or irritation due to direct chemical reactivity). According to the Assessment Report (2017) any systemic effects observed in toxicity studies were considered as secondary effects. Consequently, a local risk assessment is performed for the products of BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE family.

Exposure assessment is performed for NaOCl as available chlorine (avCl) according to the assessment report of the active substance Sodium hypochlorite.

In water, sodium hypochlorite (NaOCl) hydrolyzes to hypochlorous acid (HClO). Furthermore, hypochlorous acid participates in the following equilibrium with chlorine (Cl<sub>2</sub>)  $HClO + H_3O^+ + Cl^- \leftrightarrow Cl_2 + 2H_2O$ 

The ratio of  $Cl_2/HClO/ClO^-$  is pH and temperature dependent. At pH values > 10, the hypochlorite anion (ClO-) is the predominant species and only exposure to aerosols of NaOCl (as avCl) is considered relevant. The minor fraction of volatile hypochlorous acid (HClO) is considered negligible.

All the product of the family are products with a pH higher than 10. Therefore only exposure to aerosols of NaOCl (as avCl) is considered relevant.

#### Considering this:

- A quantitative local risk assessment is performed for inhalation exposure to NaOCI (as avCI) aerosols;
- A qualitative local risk assessment is performed for dermal exposure to NaOCl (as avCl).

Secondary exposure to NaOCl upon dermal contact with dry treated surfaces is considered to be non-relevant, as described in the AR (2017): due to the high reactivity of chlorine species such as NaOCl, residues on surfaces degrade very rapidly. Decomposition to physiological sodium and chloride ions takes place which are not expected to arise any health risk.

Secondary exposure to NaOCl upon dermal contact with wet treated surfaces during contact time is considered relevant for assessment for bystander and general public. Inhalation exposure after application of NaOCl is also considered relevant for the assessment of secondary exposure.

Identification of main paths of human exposure towards active substance(s) and substances of concern from its use in biocidal product

	Summary table: relevant paths of human exposure						
	Primary (direct) exposure			Secondary (indirect) exposure			е
Exposure path	Industri al use	Profession al use	Non- profession al use	Industri al use	Profession al use	Gener al public	Via food
Inhalation	nr	Yes	Yes	nr	Yes	Yes	No
Dermal	nr	Yes	Yes	nr	Yes	Yes	No
Oral	nr	No	Yes	nr	No	No	Yes

[Please indicate the main paths of human exposure by stating "yes", "no" or "n.a." (not applicable) for each cell.]

### List of scenarios

	Summary table: exposure scenarios	
Scenario and task number	Description of scenario and tasks	Exposed group
Primary exposure		
Scenario 1	Disinfection of surfaces by spraying	
Task [1.1]	Mixing and loading	Professionals
Task [1.2]	Application by spraying with a trigger spray	Professionals
Task [1.3]	Post-application - Rinsing with a cloth	Professionals
Scenario 2	Disinfection of surfaces by wiping with a mop/cloth and bucket	
Task [2.1]	Mixing and loading	Professionals
Task [2.2]	Application of the product by mopping and wiping	Professionals
Task [2.3.a]	Post-application - Rinsing with a mop	Professionals
Task [2.3.b]	Post-application - Rinsing with a cloth	Professionals
Scenario 3	Disinfection of surfaces by spraying	
Task [3.1]	Mixing and loading manual	Non professionals
Task [3.2]	Application by spraying with a trigger spray	Non professionals
Task [3.3]	Post-application – Rinsing with a cloth	Non professionals
Scenario 4	Disinfection of surfaces by wiping with a mop/cloth and bucket	
Task [4.1]	Mixing and loading manual	Non professionals
Task [4.2]	Application of the diluted product by mopping or wiping	Non professionals
Task [4.3]	Post-application – Rinsing with a mop or cloth	Non professionals
Secondary exposure		
Scenario [5]	Presence of bystanders	General public / bystanders
Scenario [6]	Contact with wet treated surface and oral exposure due to hand-to-mouth transfer	General public

Reference values to be used in Risk Characterisation

Substance	Exposure route	Reference value
Sodium hypochlorite <sup>1</sup>	Oral	NOAEC <sub>oral</sub> = 0.1 % avCl
	Dermal	NOAEC <sub>dermal</sub> = 1.0 % avCl
	Inhalation	AEC <sub>inhal</sub> = 0.5 mg/m <sup>3</sup> avCl
	$ARfD = 36 \mu g/kg bw/d$	
	ADI = $3 \mu g/kg bw/d$	

<sup>&</sup>lt;sup>1</sup> according to the Assessment report for Active chlorine released from sodium hypochlorite, Italy, January 2017

#### Industrial exposure

Not relevant

#### Professional exposure

#### Primary exposure

#### Use 1: Disinfection of surfaces by spraying (PT2 and 4)

Products of meta-SPC 1, 2, 5 and 8 have to be diluted before use. The dilution rate and content of available chlorine in the dilution are reported below:

- ➤ **Meta-SPC1**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 1 (2.6% w/w) and the density of 1.052, content of avCl in the dilution is **0.82% w/w** for meta-SPC 1.
- ➤ **Meta-SPC2**: 50-75mL/L of product, taking into account the content of avCl in the meta-SPC 2 (9.6-14.5% w/w) and the density of 1.18, content of avCl in the dilution is **0.85-0.86% w/w** for meta-SPC 2.
- ➤ **Meta-SPC5**: 150mL/L of product, taking into account the content of avCl in the meta-SPC 5 (4.9% w/w) and the density of 1.091, content of avCl in the dilution is **0.80% w/w** for meta-SPC 5.
- ➤ **Meta-SPC8**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 8 (2.6% w/w) and the density of 1.051, content of avCl in the dilution is **0.82% w/w** for meta-SPC 8.

Products of **meta-SPC 3** are ready to use, the content of available chlorine in the product is **1.5% w/w**.

The professional user applies the dilution or the RTU product by spraying using a trigger spray. After a contact time of minimum 5 min, the product is rinsed with clean water (PT2) or potable water (PT4).

Exposure during the cleaning of the equipment (bucket, trigger spray) is covered by the exposure during application.

Dermal and inhalation exposure is expected during the spray application and only dermal exposure is expected during the mixing & loading and rinsing.

#### Scenario 1: Disinfection of surfaces by spraying

Task [1.1]: Mixing and loading (meta-SPC 1, 2, 5 and 8)

#### Description of Task [1.1]: Mixing and loading (meta-SPC 1, 2, 5 and 8)

Before use, products of meta-SPC 1, 2, 5 and 8 are diluted in water according to the claimed doses. The dilution step is either done manually if the packaging is less than 20L, or (semi-)automatically if the packaging is more than 20L.

As pH >10 for the products of the meta-SPC 1, 2, 5 and 8, inhalation of vapours of HClO is negligible. Exposure to aerosols is also considered negligible for manual loading due to small quantities and for semi-automated loading as no exposure is expected.

Content of available chlorine in the products of meta-SPC 1, 2, 5 and 8 ranges between 2.6% w/w and 14.5% w/w. As a worst-case approach, calculation for the dermal exposure is made with 2.6% w/w which covers all the meta-SPC (1, 2, 5 and 8).

Tier	Parameters	Value	Source
Tier 1	Maximum sodium hypochlorite concentration (%w/w avCl)	2.6% (Meta-SPC 1 and 8) 14.5% (Meta-SPC 2) 4.9% (Meta-SPC 5)	Applicant's data

#### **Calculations for Task [1.1]**

Summary	Summary table: estimated exposure concentration from professional uses			
Exposure	Tier/PPE	Estimated inhalation	Estimated dermal	
			composition (0/ cu(CI)	
scenario		concentration (mg/m3)	concentration (% avCl)	

Task [1.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

### Description of Task [1.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

The professional user applies the diluted product (meta-SPC 1, 2, 5 and 8) or the RTU product (meta-SPC3) on surfaces using a trigger spray. Dermal and inhalation exposure is expected during the spray application.

As pH > 10 for the dilutions and for RTU products of the meta-SPC 3, only exposure to aerosols of sodium hypochlorite is expected.

To assess inhalation exposure during the spray application, the **Consumer product** spraying and dusting model 2 (hand-held trigger spray) from BHHEM (p.244), is used.

The exposure value from the model is as follows:

• 10.5 mg/m3 (inhalation)

### Description of Task [1.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

Content of available chlorine in the dilution for meta-SPC 1, 2, 5 and 8 ranges between 0.80% w/w and 0.86% w/w. The maximum concentration of 0.86% w/w of available chlorine in the diluted product is used for meta-SPC 1, 2, 5 and 8. The concentration of available chlorine is 1.5% w/w in the RTU products for meta-SPC 3.

Tier	Parameters	Value	Source
Tier 1	Maximum sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (Meta-SPC 1, 2, 5 and 8)	Applicant's data
	Sodium hypochlorite concentration in RTU product (%w/w avCl)	1.5% (Meta-SPC 3)	Applicant's data
	Inhalation exposure value (mg/m3)	10.5 mg/m3	Consumer product spraying and dusting model 2

#### Calculations for Task [1.2]

Summary table: estimated exposure concentration from professional uses								
Exposure scenario	posure Tier/PPE Estimated inhalation Estimated dermal concentration (mg/m3) Concentration (% avC							
Task [1.2]	Meta-SPC 1, 2,	5 and 8						
	1 / No PPE	9.03x10 <sup>-2</sup>	0.86					
	Meta-SPC 3							
	1 / No PPE	1.58×10 <sup>-1</sup>	1.5					

Task [1.3]: Post-application - Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

# Description of Task [1.3]: Post-application – Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

After a contact time of minimum 5 min, the dilution or RTU product applied with a trigger spray is rinsed off with a wet cloth by the professional user.

After application on surfaces, the active substance is expected to quickly react with the organic surface matter during the claimed contact time. Moreover, due to the fast drying time, the decrease of the pH induced by flushing with water during the rinsing step of the treated surfaces is assumed to be of low order and the pH is assumed to remain above 10. Considering this, exposure through inhalation to vapours during this task is considered negligible.

Dermal exposure during rinsing is covered by the application of the dilution or the RTU product. As a worst case, the professional user will be exposed at a concentration not higher than the concentration of available chlorine in the dilution or RTU product.

### Description of Task [1.3]: Post-application – Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

The maximum concentration of available chlorine in the diluted product is 0.86% w/w for meta-SPC 1, 2, 5 and 8. The concentration of available chlorine is 1.5% w/w in the RTU products for meta-SPC 3.

Tier	Parameters <sup>1</sup>	Value	Source
Tier 1	Maximum sodium	0.86% (Meta-SPC 1, 2, 5 and	Applicant's
	hypochlorite concentration	8)	data
	in dilution (%w/w avCl)		
	Sodium hypochlorite	1.5% (Meta-SPC 3)	Applicant's
	concentration in RTU		data
	product (%w/w avCl)		

#### **Calculations for Task [1.3]**

Sumn	Summary table: estimated exposure concentration from professional uses								
Exposure scenario	Tier/PPE	Estimated inhalation Estimated dermal concentration (mg/m3) concentration (% avCl)							
Task [1.3]	Meta-SPC 1, 2,	5 and 8							
	1 / No PPE	negligeable	0.86						
	Meta-SPC 3								
	1 / No PPE	negligeable	1.5						

#### Combined scenarios

Combined exposure is not relevant based on the absence of systemic effects after exposure towards sodium hypochlorite. The primary mode of action of NaOCl is characterised by local irritation/corrosion and oxidation at the site of first contact; thus effects triggered by NaOCl are rather concentration than time-dependent.

For this reason, only the highest exposure level (concentration as % avCl or mg avCl/m³) is relevant for risk characterisation and the addition of exposure levels and the calculation of a combined exposure during the different tasks (e.g. M&L, application and post-application/maintenance) is not relevant.

#### Risk characterisation

Quantitative risk assessment (inhalation exposure)

#### Meta-SPC 1, 2, 5 and 8

Task/ Scenario	Tier	AEC (mg/m3)	Estimated inhalation concentration (mg/m3)	Estimated uptake/ AEC (%)				
Mixing and loadi	Mixing and loading (manual or semi-automated)							
Task [1.1]	1/ No PPE	0.5	negligeable	nr				
Application by tr	igger spray							
Task [1.2]	1/ No PPE	0.5	9.03x10 <sup>-2</sup>	18%				
<b>Post-application</b>	Post-application							
Task [1.3]	1/ No PPE	0.5	negligeable	nr				

For meta-SPC 1, 2, 5 and 8, the estimated inhalation concentration is below the AEC of sodium hypochlorite for all scenarios.

#### Meta-SPC 3 (RTU)

Task/ Scenario	Tier	AEC (mg/m3)	Estimated inhalation concentration (mg/m3)	Estimated uptake/ AEC (%)
Application by tr	igger spray			
Task [1.2]	1/ No PPE	0.5	1.58x10 <sup>-1</sup>	32%
Post-application				
Task [1.3]	1/ No PPE	0.5	negligeable	nr

For meta-SPC 3, the estimated inhalation concentration is below the AEC of sodium hypochlorite for all scenarios.

o Qualitative risk assessment (dermal exposure)

The product of meta-SPC 2, 5 and 8 are classified Skin corrosive category 1 (H314) and severe eye damage (H318), as well as the diluted products of meta-SPC 5 and 8 (see Confidential annex), and the product of meta-SPC 1 and 3 are classified Skin irritant (H315) and eye irritant (H319). All the products are intended to be applied by professionals. Considering that, a qualitative risk assessment is performed.

The professional is using the product for the mixing & loading task for a low duration per day and with PPE. Considering this, the risk is deemed acceptable. Products classified H315 are used in the same conditions (frequency, duration of exposure) as the products classified H314. Hence, the same PPE are required for the use of all these products (gloves, skin coverage and chemical goggles).

Please refer to the tables below.

For the application of the diluted products of meta-SPC 1 and 2, the dilution are not classified, leading to no unacceptable risk.

Products of meta-SPC 2, 5 and 8 are classified Skin corrosive category 1 (H314) and they are applied by spraying. Therefore, the mention EUH071 is required. However, the products of meta-SPC 2 are diluted and the dilution, which is sprayed, is not classified H314 anymore and therefore qualitative risk assessment is not necessary.

Diluted products of meta-SPC 5 and 8 are classified H314 and therefore a qualitative risk assessment is performed. The diluted products are sprayed for a low duration and with PPE. Considering this, the risk is deemed acceptable.

Outcome of qualitative local risk assessment for disinfection of surfaces by spraying by professional users: Products from meta-SPC 2, 5 and 8, and diluted products of meta-SPC 5 and 8 are skin corrosive and eye damaging.

Hazard		Exp	sure inforn	nation					Risk		
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (†) or decrease (↓) risk or both (↑↓)	
HIGH	Skin Corr. Cat 1 (H314)	2 and 4	Mixing and loading  Post-application	Skin	Frequency: once a day, everyday Duration: Mixing and loading =	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (2.6 to 14.5% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP  Trained personnel: - Professional workers - Instructions for use minimizing exposure for professionals	Acceptable	(↓) Professionals following instructions for use and RMM on the label  (↓) Professionals using PPE	
HIGH	Eye Dam. Cat 1 (H318)		(Meta-SPC 5 and 8)	Eyes	10 min Rinsing = 10 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (2.6 to 14.5% avCl)	Chemical goggles			<ul><li>(↓) Low exposure duration (few min per day)</li><li>(↑) High frequency</li></ul>	

Hazard		Exp	osure inforn	nation					Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)			Skin		Dermal contact (0.80 to 0.82% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP Trained		(↓) Professionals following instructions for use and RMM on
HIGH	Eye Dam. Cat 1 (H318)	2 and 4	Application (Meta-SPC 5 and 8)	Eyes	Frequency: once a day, everyday  Duration: Application by spraying = 30 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (0.80 to 0.82% avCl)	Chemical goggles	personnel: - Professional workers - Instructions for use minimizing exposure for professionals	Acceptable	the label  (\pmathcap) Professionals using PPE  (\pmathcap) Low exposure duration (few min per day)  (\pmathcap) High
HIGH	EUH071			Inhalation		Inhalation exposure (0.80 to 0.82% avCl)	Respiratory protective equipment			frequency  (†) Spray application

**Outcome of qualitative local risk assessment for disinfection of surfaces by spraying by professional users:** Products from meta-SPC 1 and 3 are skin and eye irritant.

Hazard		Exp	osure inforn	nation					Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
LOW	Skin Irrit. Cat 2 (H315)	2 and 4	Mixing and loading (Meta-SPC 1)	Skin	Frequency: once a day, everyday Duration: Mixing and loading =	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (2.6% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP  Trained personnel: - Professional workers - Instructions for use minimizing exposure for	Acceptable	(↓) Professionals following instructions for use and RMM on the label  (↓) Professionals using PPE
LOW	Eye Irrit. Cat 2 (H319)		application (Meta-SPC 3)	Eyes	10 min Rinsing = 10 min	Eye exposure through potential splashed or hand-to-eye transfer during task	Chemical goggles	professionals		<ul><li>(↓) Low exposure duration (less than few hours per day)</li><li>(↑) High frequency</li></ul>

Hazard		Exposure information						Risk		
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (†) or decrease (↓) risk or both (↑↓)
LOW	Skin Irrit. Cat 2 (H315)			Skin	Fraguenau	Dermal contact (1.5% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP		(↓) Professionals following instructions for use and RMM on
LOW	Eye Irrit. Cat 2 (H319)	2 and 4	Application (Meta-SPC 3)		Frequency: once a day, everyday  Duration: Mixing and loading = 10 min  Application by spraying = 30 min	Eye exposure through potential splashed or hand-to-eye transfer during task	Chemical goggles	Trained personnel: - Professional workers - Instructions for use minimizing exposure for professionals	Acceptable	the label  (↓) Professionals using PPE  (↓) Low exposure duration (less than few hours per day)  (↑) High frequency  (↑) Spray application

## Conclusion for Use 1 – Disinfection of surfaces by spraying (Meta-SPC 1, 2, 3, 5 and 8):

For products pertaining to **Meta-SPC 1 and 2,** the risk is considered acceptable taking into account the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM) and personal protective equipment (PPE) listed below:

For mixing and loading task: gloves, body protection and chemical goggles.

For products pertaining to **Meta-SPC 3**, the risk is considered acceptable taking into account the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM) and personal protective equipment (PPE) listed below:

- For application by spraying and post-application task: gloves, body protection and chemical goggles.

For products pertaining to **Meta-SPC 5 and 8**, the risk is considered acceptable taking into account the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM) and personal protective equipment (PPE) listed below:

- For mixing and loading and post-application tasks: gloves, body protection and chemical goggles.
- For application by spraying: gloves, body protection, chemical goggles and respiratory protective equipment.

# Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT2 and 4)

Products of meta-SPC 1, 2, 5 and 8 have to be diluted before use. The dilution rate and content of available chlorine in the dilution are reported below:

- ➤ **Meta-SPC1**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 1 (2.6% w/w) and the density of 1.052, content of avCl in the dilution is **0.82% w/w** for meta-SPC 1.
- ➤ **Meta-SPC2**: 50-75mL/L of product, taking into account the content of avCl in the meta-SPC 2 (9.6-14.5% w/w) and the density of 1.18, content of avCl in the dilution is **0.85-0.86% w/w** for meta-SPC 2.
- ➤ **Meta-SPC5**: 150mL/L of product, taking into account the content of avCl in the meta-SPC 5 (4.9% w/w) and the density of 1.091, content of avCl in the dilution is **0.80% w/w** for meta-SPC 5.
- ➤ **Meta-SPC8**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 8 (2.6% w/w) and the density of 1.051, content of avCl in the dilution is **0.82% w/w** for meta-SPC 8.

The professional user applies the dilution by mopping or wiping with a cloth. After a contact time of minimum 5 min, the product is rinsed with clean water (PT2) or potable water (PT4).

Exposure during the cleaning of the equipment (bucket, mop, cloth) is covered by the exposure during application.

Dermal and inhalation exposure is expected during the application and only dermal exposure is expected during the post-application tasks.

#### Scenario 2: Disinfection of surfaces by wiping with a mop/cloth and bucket

Task [2.1]: Mixing and loading (meta-SPC 1, 2, 5 and 8)

#### Description of Task [2.1]: Mixing and loading (meta-SPC 1, 2, 5 and 8)

Before use, products of meta-SPC 1, 2, 5 and 8 are diluted in water according to the claimed doses. The dilution step is either done manually if the packaging is less than 20L, or (semi-)automatically if the packaging is more than 20L.

This task is similar to the Mixing and Loading before spraying. Refer to Task [1.1].

#### Task [2.2]: Application of the product mopping and wiping (meta-SPC 1, 2, 5 and 8)

## Description of Task [2.2]: Application of the product by mopping and wiping (meta-SPC 1, 2, 5 and 8)

The professional user applies the dilution (meta-SPC 1, 2, 5 and 8) on surfaces by wiping using a mop or a cloth and bucket.

## Description of Task [2.2]: Application of the product by mopping and wiping (meta-SPC 1, 2, 5 and 8)

Exposure by inhalation to vapours of sodium hypochlorite is not expected, as pH for the dilution is > 10 for these meta-SPC.

According to HEEG Opinion 8 "Defaults and appropriate models to assess human exposure for dipping processes (PT 8)", the Dipping model 1 (p. 26 of Userguidance and p. 308 of BHHEM) is appropriate to assess exposure during manual dipping.

In this model, no inhalation exposure is expected during the task consisting in the dipping of wooden articles in open tanks.

It is assumed that the inhalation exposure during the dipping of wooden articles is similar to the exposure during the dipping of a mop or a cloth in a bucket.

Therefore, exposure to aerosols during mopping or wiping activities (including dipping of a cloth into a bucket) is considered negligible.

Content of available chlorine in the dilution for meta-SPC 1, 2, 5 and 8 ranges between 0.80% w/w and 0.86% w/w. The maximum concentration of 0.86% w/w of available chlorine in the diluted product is used for calculation.

Tier	Parameters	Value	Source
Tier 1	Maximum sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (meta-SPC 1, 2, 5 and 8)	Applicant's data

#### Calculations for Task [2.2]

Summary table: estimated exposure concentration from professional uses							
Exposure Scenario Tier/PPE Estimated inhalation Estimated dermal concentration (mg/m3) Concentration (% avCl)							
Task [2.2]	Meta-SPC 1, 2,	°C 1, 2, 5 and 8					
	1 / No PPE	negligible	0.86				

Task [2.3.a]: Post-application - Rinsing with a mop (meta-SPC 1, 2, 5 and 8)

## Description of Task [2.3.a]: Post-application –Rinsing with a mop (meta-SPC 1, 2, 5 and 8)

After a contact time of minimum 5 min, the diluted product applied by mopping is rinsed off with water using a mop.

This task is similar to the rinsing with a cloth after spraying. Refer to Task [1.3].

Tier	Parameters <sup>1</sup>	Value	Source
Tier 1	Max sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (Meta-SPC 1, 2, 5 and 8)	Applicant's data

#### Calculations for Task [2.3.a]

Summary table: estimated exposure concentration from professional uses								
<b>Exposure</b> scenario	Fier/PPE Estimated inhalation Estimated dermal concentration (mg/m3) concentration (% avCl)							
Task	Meta-SPC 1, 2,	Meta-SPC 1, 2, 5 and 8						
[2.3.a]	1 / No PPE	<u> </u>						

Task [2.3.b]: Post-application - Rinsing with a cloth (meta-SPC 1, 2, 5 and 8)

# Description of Task [2.3.b]: Post-application – Rinsing with a cloth (meta-SPC 1, 2, 5 and 8)

After a contact time of minimum 5 min, the dilution product applied by moping or wiping can also be rinsed off with a wet cloth by the professional user. This task is similar to the rinsing with a cloth after spraying. Refer to Task [1.3].

Tier	Parameters <sup>1</sup>	Value	Source
Tier 1	Max sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (Meta-SPC 1, 2, 5 and 8)	Applicant's data

#### Calculations for Task [2.3.b]

Summ	Summary table: estimated exposure concentration from professional uses							
Exposure								
scenario		concentration (mg/m3) concentration (% avCl)						
Task	Meta-SPC 1, 2,	Meta-SPC 1, 2, 5 and 8						
[2.3.b]	1 / No PPE	, ,						

#### Combined scenarios

Combined exposure is not relevant based on the absence of systemic effects after exposure towards sodium hypochlorite. The primary mode of action of NaOCl is characterised by local irritation/corrosion and oxidation at the site of first contact; thus effects triggered by NaOCl are rather concentration than time-dependent.

For this reason, only the highest exposure level (concentration as % avCl or mg avCl/m³) is relevant for risk characterisation and the addition of exposure levels and the calculation of a combined exposure during the different tasks (e.g. M&L, application and post-application/maintenance) is not relevant.

#### Risk characterisation

Local effect (sodium hypochlorite)

Quantitative risk assessment (inhalation exposure)

#### Meta-SPC 1, 2, 5 and 8

For all tasks of scenario 2 for meta-SPC 1, 2, 5 and 8, the estimated inhalation concentration is considered negligible and therefore below the AEC of sodium hypochlorite.

Qualitative risk assessment (dermal exposure)

The products of meta-SPC 2, 5 and 8 are classified Skin corrosive category 1 (H314) and severe eye damage (H318), as well as the diluted products of meta-SPC 5 and 8 (see Confidential annex), and the products of meta-SPC 1 are classified Skin irritant (H315) and eye irritant (H319). The products are intended to be applied by professionals. Considering that, a qualitative risk assessment is performed.

The professional is using the product for the mixing & loading task for a low duration per day and with PPE. Considering this, the risk is deemed acceptable. Products classified H315 are used in the same conditions (frequency, duration of exposure) as the products classified H314. Hence, the same PPE are required for the use of all these products (gloves, skin coverage and chemical goggles).

For the application by wiping of diluted products classified H314 and H318 (meta-SPC 5 and 8), the professional user is directly exposed to corrosive product for a high duration when using a cloth or a mop without a handle. Indeed, the user is exposed during the entire duration of the task to corrosive product on the mop or the cloth and in the bucket during the dipping. Considering this, the risk is not considered acceptable. However, if a mop with a handle is used for the application, the risk is deemed acceptable, as exposure to the corrosive product is limited.

Please refer to the tables below.

### Outcome of qualitative local risk assessment for disinfection of surfaces by mopping or wiping by professional users:

Products from meta-SPC 2, 5 and 8 and diluted products from meta-SPC 5 and 8 are skin corrosive and eye damaging.

Hazard	•	Expo	sure inforn	nation		•			Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)	2 and 4	Mixing and loading  Post-application	Skin	Frequency: once a day, everyday Duration: Mixing and loading =	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (2.6 to 14.5% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP  Trained personnel: - Professional workers	Acceptable	(↓) Professionals following instructions for use and RMM on the label (↓) Professionals using PPE
HIGH	Eye Dam. Cat 1 (H318)		(meta-SPC 5 and 8)	Eyes	10 min Rinsing = 10 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (2.6 to 14.5% avCl)	Chemical goggles	- Instructions for use minimizing exposure for professionals		<ul><li>(↓) Low exposure duration (few min per day)</li><li>(↑) High frequency</li></ul>

Outcome of qualitative local risk assessment for disinfection of surfaces by mopping or wiping by professional users: Diluted products from meta-SPC 5 and 8 are skin corrosive and eye damaging.

Hazard		Expo	osure inforn	nation					Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)			Skin		Dermal contact (0.8 and 0.82% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP Trained personnel:		(↓) Professionals following instructions for use and RMM on
HIGH	Eye Dam. Cat 1 (H318)	2 and 4	Application using a mop with a handle	Eyes	Frequency: once a day, everyday  Duration: Mopping/ wiping = 120 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (0.8 and 0.82% avCl)	Chemical goggles	- Professional workers - Instructions for use minimizing exposure for professionals  RMM: - Do not dip your hands in the bucket - Apply the product only with a mop with a handle	Acceptable	the label  (↓) Professionals using PPE  (↓) Low exposure duration as exposure is limited by the handle  (↑) High frequency

Hazard		Exposure information Risk								
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route		Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)			Skin	Frequency:	Dermal contact (0.8 and 0.82% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP  Trained personnel: - Professional		(1) Professionals following instructions for use and RMM on the label
HIGH	Eye Dam. Cat 1 (H318)	2 and 4	Application by wiping with a cloth or a mop without a handle	Eyes	once a day, everyday  Duration: Mopping/ wiping = 120 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (0.8 and 0.82% avCl)	Chemical goggles	workers - Instructions for use minimizing exposure for professionals  RMM: - Do not dip your hands in the bucket - Apply the product only with a mop with a handle	Not acceptable	<ul> <li>(↓) Professionals using PPE</li> <li>(↑) Exposure to corrosive product</li> <li>(↑) High exposure duration</li> <li>(↑) High frequency</li> </ul>

Outcome of qualitative local risk assessment for disinfection of surfaces by mopping or wiping by professional users: Products from meta-SPC 1 are skin and eye irritant.

Hazard		Expo	sure inforn	nation					Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE	Relevant RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
LOW	Skin Irrit. Cat 2 (H315)	2 and 4	Mixing and loading	Skin	Frequency: once a day, everyday Duration:	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate (2.6% avCl)	Gloves Skin coverage Eye protection Optional face shield	Labelling: - Labelling according to CLP  Trained personnel: - Professional	Acceptable	(↓) Professionals following instructions for use and RMM on the label  (↓) Professionals using PPE
LOW	Eye Irrit. Cat 2 (H319)			Eyes	Mixing and loading = 10 min	Eye exposure through potential splashed or hand-to-eye transfer during task  (2.6% avCl)	Chemical goggles	workers - Instructions for use minimizing exposure for professionals		<ul><li>(↓) Low exposure duration (less than few hours per day)</li><li>(↑) High frequency</li></ul>

## Conclusion for Use 2 – Disinfection of surfaces by wiping with a mop/cloth and bucket (Meta-SPC 1, 2, 5 and 8):

For products pertaining to **Meta-SPC 1 and 2**, the risk is considered acceptable taking into account the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM) and personal protective equipment (PPE) listed below:

- For mixing and loading task: gloves, body protection and chemical goggles.
- For application by mopping or wiping and post-application task (Meta-SPC 5 and 8): gloves, body protection and chemical goggles.

For products pertaining to **Meta-SPC 5 and 8**, the risk is considered unacceptable **for wiping with a cloth or a mop without a handle** taking into account the qualitative risk assessment for local effects.

However, for products of **Meta-SPC 5 and 8**, the risk is considered acceptable for **wiping with a mop with a handle**, taking into account the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM) and personal protective equipment (PPE) listed below:

- For mixing and loading task: gloves, body protection and chemical goggles.
- For application by mopping or wiping and post-application task: gloves, body protection and chemical goggles.
- Do not dip your hands in the bucket.
- Apply the product only with a mop with a handle.

### NA-MIC minor change application (2022)

The minor changes have no impact on the human health risk assessment.

#### Non-professional exposure

#### **Primary exposure**

#### Use 1: Disinfection of surfaces by spraying (PT2 and 4)

Products of meta-SPC 1, 2, 5 and 8 have to be diluted before use. The dilution rate and content of avCl in the dilution are reported below:

- ➤ **Meta-SPC1**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 1 (2.6% w/w) and the density of 1.052, content of avCl in the dilution is **0.82% w/w** for meta-SPC 1.
- ➤ **Meta-SPC2**: 50-75mL/L of product, taking into account the content of avCl in the meta-SPC 2 (9.6-14.5% w/w) and the density of 1.18, content of avCl in the dilution is **0.85-0.86% w/w** for meta-SPC 2.
- ➤ **Meta-SPC5**: 150mL/L of product, taking into account the content of avCl in the meta-SPC 5 (4.9% w/w) and the density of 1.091, content of avCl in the dilution is **0.80% w/w** for meta-SPC 5.
- ➤ **Meta-SPC8**: 300mL/L of product, taking into account the content of avCl in the meta-SPC 8 (2.6% w/w) and the density of 1.051, content of avCl in the dilution is **0.82%** w/w for meta-SPC 8.

Products of meta-SPC 3 are ready to use. The content of avCl in the product is 1.5% w/w.

The non-professional user applies the dilution or the RTU product by spraying using a trigger spray. After a contact time of minimum 5 min, the product is rinsed with clean water (PT2) or potable water (PT4).

Exposure during the cleaning of the equipment (bucket, trigger spray) is covered by the exposure during application.

Dermal and inhalation exposure is expected during the spray application and only dermal exposure is expected during the mixing&loading and rinsing.

#### Scenario 3: Disinfection of surfaces by spraying

Task [3.1]: Mixing and loading manual (meta-SPC 1, 2, 5 and 8)

#### Description of Task [3.1]: Mixing and loading manual (meta-SPC 1, 2, 5 and 8)

According to the ConsExpo Disinfectant Products Factsheet, during the mixing and loading of a liquid, dermal exposure can occur.

Exposure by inhalation is considered negligible as no vapour is expected. Indeed, as pH > 10 for the products of the meta-SPC 1, 2, 5 and 8, vapours of HClO are negligeable.

Content of avCl in the products of meta-SPC 1, 2, 5 and 8 ranges between 2.6% w/w and 14.5% w/w. Calculation for the dermal exposure is made with 2.48% w/w, which covers all the meta-SPC (1, 2, 5 and 8).

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite concentration (%w/w avCl)	2.6% (Meta-SPC 1 and 8) 14.5% (Meta-SPC 2) 4.9% (Meta-SPC 5)	Applicant's data

#### Calculations for Task [3.1]

Summary table: estimated exposure concentration from non-professional uses							
Exposure   Tier/PPE   Estimated inhalation   Estimated dermal   concentration (mg/m3)   concentration (% avCl							
Scellario		concentration (mg/ms) concentration (% avci)					
Task [3.1]	1 / No PPE	negligible	2.6				

Task [3.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

# Description of Task [3.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

The non professional user applies the diluted product or RTU product on surfaces using a trigger spray. Dermal and inhalation exposure is expected during the spray application.

As pH > 10 for the dilution and for RTU products of the meta-SPC 3, only exposure to aerosols of sodium hypochlorite is expected.

### Description of Task [3.2]: Application of the product by trigger spray (meta-SPC 1, 2, 3, 5 and 8)

To assess inhalation exposure during the spray application, the **Consumer product** spraying and dusting model 2 (hand-held trigger spray) from BHHEM (p.244), is used.

The exposure value from the model is:

10.5 mg/m3 (inhalation)

Content of avCl in the dilution for meta-SPC 1, 2, 5 and 8 ranges between 0.80% w/w and 0.86% w/w. The maximum concentration of 0.86% w/w of available chlorine in the diluted product is used for meta-SPC 1, 2, 5 and 8. The concentration of available chlorine is 1.5% w/w in the RTU products for meta-SPC 3.

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (Meta-SPC 1, 2, 5 and 8)	Applicant's data
	Sodium hypochlorite concentration in RTU product (%w/w avCl)	1.5% (Meta-SPC 3)	Applicant's data

#### Calculations for Task [3.2]

Summai	Summary table: estimated exposure concentration from non-professional uses								
Exposure scenario	Tier/PPE	Estimated inhalation concentration (mg/m3)	Estimated dermal concentration (% avCl)						
Task [3.2]	Meta-SPC 1, 2,	5 and 8							
	1 / No PPE	9.03x10 <sup>-2</sup>	0.86						
	Meta-SPC 3	eta-SPC 3							
	1 / No PPE	1.58x10 <sup>-1</sup>	1.5						

Task [3.3]: Post-application - Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

# Description of Task [3.3]: Post-application –Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

After a contact time of minimum 5 min, the dilution or RTU product applied with a trigger spray is rinsed off with a wet cloth by the non-professional user.

After application on surfaces, the active substance is expected to quickly react with the organic surface matter during the claimed contact time. Moreover, due to the fast drying time, the decrease of the pH induced by flushing with water during the rinsing step of the treated surfaces is assumed to be of low order and the pH is assumed to remain above 10. Considering this, exposure through inhalation to vapours during this task is considered negligible.

According to the ConsExpo Disinfectant Products Factsheet (4.2.2.3), during rinsing, dermal exposure can occur.

## Description of Task [3.3]: Post-application –Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

Dermal exposure during rinsing is covered by the application of the dilution / RTU product. As a worst case, the non-professional user will be exposed at a concentration not higher than the concentration of avCl in the dilution or RTU product.

The maximum concentration of available chlorine in the diluted product is 0.86% w/w for meta-SPC 1, 2, 5 and 8. The concentration of available chlorine is 1.5% w/w in the RTU products for meta-SPC 3.

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite	0.86% (Meta-SPC 1, 2, 5 and	Applicant's
	concentration in dilution	8)	data
	(%w/w avCl)		
	Sodium hypochlorite	1.5% (Meta-SPC 3)	Applicant's
	concentration in RTU		data
	product (%w/w avCl)		

#### Calculations for Task [3.3]

Summar	Summary table: estimated exposure concentration from non-professional uses										
Exposure scenario	Tier/PPE	Estimated inhalation concentration (mg/m3)	Estimated dermal concentration (% avCl)								
Task [3.3]	Meta-SPC 1, 2, 5 and 8										
	1 / No PPE	negligible	0.86								
	Meta-SPC 3	, , , , , , , , , , , , , , , , , , , ,									
	1 / No PPE	negligible	1.5								

#### Combined scenarios

Combined exposure is not relevant based on the absence of systemic effects after exposure towards sodium hypochlorite. The primary mode of action of NaOCl is characterised by local irritation/corrosion and oxidation at the site of first contact; thus effects triggered by NaOCl are rather concentration than time-dependent.

For this reason, only the highest exposure level (concentration as % avCl or mg avCl/m<sub>3</sub>) is relevant for risk characterisation and the addition of exposure levels and the calculation of a combined exposure during the different tasks (e.g. M&L, application and post-application/maintenance) is not relevant.

#### Risk characterisation

#### Use 1: Disinfection of surfaces by spraying (PT2 and 4)

o Quantitative risk assessment (inhalation exposure)

#### Meta-SPC 1, 2, 5 and 8

Inhalation exposure

Task/ Scenario	Tier	AEC (mg/m3)	Estimated concentration (mg/m3)	Estimated concentration / AEC (%)						
M&L										
Task [3.1]	Negligible			n.r.						
Application by tri	Application by trigger spray									
Task [3.2]	1/ No PPE	0.5	9.03x10 <sup>-2</sup>	18%						
Post application										
Task [3.3]	Negligible			n.r.						

For meta-SPC 1, 2, 5 and 8, the estimated inhalation concentration is below the AEC of sodium hypochlorite for all scenarios.

#### Meta-SPC 3

Inhalation exposure

Task/ Scenario	Tier	AEC (mg/m3)	Estimated concentration (mg/m3)	Estimated concentration / AEC (%)					
Application by tri	Application by trigger spray								
Task [3.2]	1/ No PPE	0.5	1.58x10 <sup>-1</sup>	32%					
Post application									
Task [3.3]	Negligible	_		n.r.					

For meta-SPC 3, the estimated inhalation concentration is below the AEC of sodium hypochlorite for all scenarios.

#### o Qualitative risk assessment (dermal exposure)

The products of meta-SPC 2, 5 and 8 are classified Skin corrosive category 1 (H314) and severe eye damage (H318), as well as diluted products of meta-SPC 5 and 8 (see Confidential annex), and the products for meta-SPC 1 and 3 are classified skin irritant (H315) and eye irritant (H319). All the products are intended to be applied by non-professional. Considering that, a qualitative risk assessment is performed. Please refer to the tables below.

For products of META SPC 2, 5 and 8, considering the absence of a protection offered by the packaging to limit exposure, risk is not considered acceptable for non-professional. For the products of META SPC 1, the non-professional is using the product for a moderate frequency and for a low duration per day. Considering this and the additional RMM "washing on hands after use", the risk is deemed acceptable.

For application of meta-SPC 3 applied by spraying, the non-professional is expected using the product for a moderate frequency and for a duration lower than 1 hour per day. Considering this and the additional RMM "washing on hands after use" and the product has to be sprayed downward, the risk is deemed acceptable.

For the application of the diluted products of meta-SPC 1 and 2, the dilution are not classified, leading to no unacceptable risk.

Diluted products of meta-SPC 5 and 8 are classified H314 and therefore a qualitative risk assessment is performed. The corrosive diluted products are sprayed for 30min continuously by non professional user leading to high exposure of corrosive product. Considering this, the risk is not acceptable.

#### o Qualitative risk assessment (inhalation exposure)

Products of meta-SPC 2, 5 and 8 are classified Skin corrosive category 1 (H314) and they are applied by spraying. Therefore, the mention EUH071 is required. However, the products of meta-SPC 2 are diluted and the dilution, which is sprayed, is not classified H314 anymore and therefore qualitative risk assessment is not necessary.

Diluted products of meta-SPC 5 and 8 are classified H314 and therefore a qualitative risk assessment is performed. The corrosive diluted products are sprayed for 30min continuously by non professional user leading to high exposure of corrosive product. Considering this, the risk is not acceptable.

**Outcome of qualitative local risk assessment for disinfection of surfaces by spraying by non-professional users:** Products from meta-SPC 1 and 3 are skin and eye irritant.

Hazard		Exp	osure inform	ation				Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
LOW	Skin Irrit. Cat 2 (H315)	2 and 4	Mixing and loading (meta-SPC 1)	Skin	Frequency: no data  Duration:  Mixing and loading =	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (1.5 to 2.6% avCl)	No PPE  Labelling: - Labelling according to CLP - Instructions for use and storage	Acceptable	<ul> <li>(↓) instruction of use and RMM on the label (washing on hands after use)</li> <li>(↓) Low exposure duration (less than one hour per day)</li> <li>(↑) moderate frequency</li> </ul>
LOW	Eye Irrit. Cat 2 (H319)	•	Rinsing (meta-SPC 3)	Eyes	1.33 min  Rinsing =  10 min	Eye exposure through potential splashed or hand-to-eye transfer (1.5 to 2.6% avCl)	<ul> <li>"Washing on hands after use"</li> <li>Packaging:         <ul> <li>Child-proof closure</li> </ul> </li> </ul>		<ul> <li>(↑) Formulation (liquid formulation to be diluted, no viscious formulation limitating splashes)</li> <li>(↓) child-proof closure</li> </ul>

Hazard		Exp	Exposure information						
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
LOW	Skin Irrit. Cat 2 (H315)			Skin		Dermal contact (1.5% avCl)			(↓) instruction of use and RMM on the label (washing on hands after use, the
LOW	Eye Irrit. Cat 2 (H319)	2 and 4	Application (meta-SPC 3)	Eyes	Frequency: no data  Duration:  Spraying application = 30 min	Eye exposure through potential spraying or hand-to-eye transfer (1.5% avCl)	No PPE  Labelling: - Labelling according to CLP - Instructions for use and storage - "Washing on hands after use" - "The product has to be sprayed downward"  Packaging: - Child-proof closure	Acceptable	product should be sprayed downward)  (↑) Exposure by spraying  (↓) Low exposure duration (less than one hours per day)  (↑) moderate frequency  (↓) child-proof closure  (↓) no children or infant exposure

**Outcome of qualitative local risk assessment for disinfection of surfaces by spraying by non-professional users:** Products from Meta-SPC 2, 5 and 8 and diluted products from meta-SPC 5 and 8 are skin corrosive and eye damage

Hazard		Exposure information						Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)	2 and 4	Mixing and loading	Skin	Frequency: no data Duration: Mixing and loading = 1.33 min	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (2.6 to 14.5% avCl)	<u>None</u>	Not acceptable	<ul> <li>(↓) instruction of use and RMM on the label (washing on hands after use)</li> <li>(↓) Low exposure duration (less than few minutes per day)</li> <li>(↑) Formulation (liquid formulation to be diluted, no</li> </ul>

HIGH	Eye Dam. Cat 1 (H318)	Eyes	Eye exposure through potential splashed or hand-to-eye transfer (2.6 to 14.5% avCl)	undiluted a first time for measurement and then in a bucket leading to an increas of potential dermal exposur through spills and splashes)
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<fr></fr>	<biocidal based="" family="" on="" p="" product="" sod!<=""> HYPOCHLORITE&gt;</biocidal>	YPT 2, 4>	
			with no classification) and/or to reduce splashes;
			(↓) Other packaging;
			(1) Restriction of the use frequency

Application (meta-SPC 5 and 8)

Hazard		Expo	osure inform	ation				Risk	Risk		
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)		
HIGH	Skin Corr. Cat 1 (H314)			Skin		Dermal contact (0.8 and 0.82% avCl)			(↓) instruction of use and RMM on the label (washing on hands after use, the product should be sprayed downward)		
HIGH	Eye Dam. Cat 1 (H318)	2 and 4	Application	Eyes	Frequency: no data  Duration:  Spraying application = 30min	Eye exposure through potential splashed or hand-to-eye transfer (0.8 and 0.82% avCl)	<u>None</u>	Not Acceptable	<ul> <li>(↑) Exposure by spraying</li> <li>(↑) Exposure to corrosive substance</li> <li>(↑) Moderate exposure duration</li> <li>(↑) moderate frequency (equal to or less than once per week cannot be ensure)</li> <li>(↓) child-proof closure</li> <li>(↓) no children or infant exposure</li> </ul>		

# Conclusion for Use 1: Disinfection of surfaces by spraying (Meta-SPC 1, 2, 3, 5 and 8)

For products pertaining to **Meta-SPC 1**, risk is acceptable considering the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM):

- Washing on hands after use

For products pertaining to **Meta-SPC 3**, risk is acceptable considering the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM):

- Washing on hands after use
- The product has to be sprayed downward

For products pertaining to **Meta-SPC 2, 5 and 8**, risk is not acceptable considering the qualitative risk assessment for local effects.

# Use 2: Disinfection of surface by wiping with mop / cloth and bucket (PT2 and 4)

As for use 1, products of meta-SPC 1, 2, 5 and 8 have to be diluted before use. The dilution rate and content of avCl in the dilution are the same as for the use 1:

- ➤ Meta-SPC1: 300mL/L of product, equivalent to 0.82% w/w of avCl in the dilution.
- ➤ Meta-SPC2: 50-75mL/L of product, equivalent to 0.85-0.86% w/w of avCl in the dilution.
- ➤ **Meta-SPC5**: 150mL/L of product, equivalent to **0.80% w/w** of avCl in the dilution.
- ➤ **Meta-SPC8**: 300mL/L of product, equivalent to **0.82% w/w** of avCl in the dilution.

The non-professional user applies the dilution by mopping or wiping with cloth. After a contact time of minimum 5 min, the product is rinsed with clean water (PT2) or potable water (PT4).

Exposure during the cleaning of the equipment (bucket, mop, cloth) is covered by the exposure during application.

Only dermal exposure is expected during the mixing&loading, application and rinsing.

## Scenario 4: Disinfection of surface by wiping with mop/cloth and bucket

Task [4.1]: Mixing and loading manual (meta-SPC 1, 2, 5 and 8)

#### Description of Task [4.1]: Mixing and loading manual (meta-SPC 1, 2, 5 and 8)

According to the ConsExpo Disinfectant Products Factsheet, during the mixing and loading of a liquid, dermal exposure can occur.

Exposure by inhalation is considered negligible as no vapour is expected. Indeed, as pH > 10 for the products of the meta-SPC 1, 2, 5 and 8, vapours of HClO are negligeable.

Content of avCl in the products of meta-SPC 1, 2, 5 and 8 ranges between 2.6% w/w and 14.5% w/w. Calculation for the dermal exposure is made with 2.6% w/w which covers all the meta-SPC (1, 2, 5 and 8).

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite	2.6% (Meta-SPC 1 and 8)	Applicant's
	concentration (%w/w avCl)	14.5% (Meta-SPC 2)	data
		4.9% (Meta-SPC 5)	

#### **Calculations for Task [4.1]**

Summar	Summary table: estimated exposure concentration from non-professional uses						
Exposure	Tier/PPE	Estimated inhalation	Estimated dermal				
scenario		concentration (mg/m3)	concentration (% avCl)				
Task [4.1]	1 / No PPE	negligeable	2.6				

Task [4.2]: Application of the product by mopping or wiping (meta-SPC 1, 2, 5 and 8)

# Description of Task [4.2]: Application of the product by mopping or wiping (meta-SPC 1, 2, 5 and 8)

The non-professional user applies the diluted product on surfaces using a mop or a cloth. Dermal exposure is expected during the application.

According to the ConsExpo Disinfectant Products Factsheet, during application, dermal exposure can occur.

Exposure by inhalation is considered negligeable as no vapour is expected. Indeed, as pH > 10 for the dilution, vapours of HClO are negligeable.

Content of avCl in the dilution for meta-SPC 1, 2, 5 and 8 ranges between 0.80% w/w and 0.86% w/w. The maximum concentration of 0.86% w/w of available chlorine in the diluted product is used for meta-SPC 1, 2, 5 and 8.

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite	0.86% (Meta-SPC 1, 2, 5 and	Applicant's
	concentration in dilution	8)	data
	(%w/w avCl)		

#### **Calculations for Task [4.2]**

Summai	Summary table: estimated exposure concentration from non-professional uses						
Exposure scenario	Tier/PPE	Estimated inhalation concentration (mg/m3)	Estimated dermal concentration (% avCl)				
Task [4.2]	Meta-SPC 1, 2, 5 and 8						
	1 / No PPE	negligeable	0.86				

# Task [4.3]: Post-application – Rinsing with a cloth (meta-SPC 1, 2, 3, 5 and 8)

# Description of Task [4.3]: Post-application –Rinsing with a cloth (meta-SPC 1, 2, 5 and 8)

After a contact time of minimum 5 min, the dilution applied with a mop or cloth is rinsed off with a wet mop or cloth by the non-professional user.

This task is similar to the rinsing with a cloth after spraying. Refer to Task [3.3].

Normally no rinsing is required after mopping according to the ConsExpo Disinfectant Products Factsheet.

Tier	<b>Parameters</b>	Value	Source
Tier 1	Max sodium hypochlorite	0.86% (Meta-SPC 1, 2, 5 and	Applicant's
	concentration in dilution	8)	data
	(%w/w avCl)		

## Calculations for Task [4.3]

Summary table: estimated exposure concentration from non-professional uses							
Exposure Tier/PPE scenario		Estimated inhalation concentration (mg/m3)	Estimated dermal concentration (% avCl)				
Task [4.3]	Meta-SPC 1, 2, 5 and 8						
	1 / No PPE	negligeable	0.86				

#### Combined scenarios

Combined exposure is not relevant based on the absence of systemic effects after exposure towards sodium hypochlorite. The primary mode of action of NaOCl is characterised by local irritation/corrosion and oxidation at the site of first contact; thus effects triggered by NaOCl are rather concentration than time-dependent.

For this reason, only the highest exposure level (concentration as % avCl or mg avCl/m<sub>3</sub>) is relevant for risk characterisation and the addition of exposure levels and the calculation of a combined exposure during the different tasks (e.g. M&L, application and post-application/ maintenance) is not relevant.

#### **Risk characterisation**

# Use 2: Disinfection of surfaces by wiping with mop/cloth and bucket (PT2 and 4)

Quantitative risk assessment (inhalation exposure)

For all tasks and all scenari, exposure by inhalation is negligeable for meta-SPC 1, 2, 5 and 8.

Qualitative risk assessment (dermal exposure)

The products of meta-SPC 2, 5 and 8 are classified Skin corrosive (H314) and severe eye damage (H318), as well as the diluted products of meta-SPC 5 and 8 (see Confidential annex), and the products for meta-SPC 1 are classified skin irritant (H315) and eye irritant (H319). All the products are intended to be applied by non-professional. Considering that, a qualitative risk assessment is performed. Please refer to the tables below.

For products of META SPC 2, 5 and 8, considering the absence of a protection offered by the packaging to limit exposure, risk is not considered acceptable for non-professional. For the products of META SPC 1, the non-professional is using the product for a moderate frequency and for a low duration per day. Considering this and the additional RMM "washing on hands after use", the risk is deemed acceptable.

For the application of the diluted products of meta-SPC 1 and 2, the dilution are not classified, leading to no unacceptable risk.

Diluted products of meta-SPC 5 and 8 are classified H314 and therefore a qualitative risk assessment is performed. The corrosive diluted products are expected to be used more than few minute per day. Moreover high exposure of corrosive product is expected with the use of a mop and a bucket and even with a mop with a handle. Considering this, the risk is not acceptable.

Outcome of qualitative local risk assessment for disinfection of surfaces by mopping or wiping by non-professional users: Products from meta-SPC 1 are skin and eye irritant.

Hazard	Hazard		osure inform	ation				Risk	Risk		
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)		
LOW	Skin Irrit. Cat 2 (H315)	2	Mixing and	Skin	Frequency: no data Duration:	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid concentrate  (2.6% avCl)	No PPE  Labelling: - Labelling according to CLP - Instructions for use		<ul> <li>(↓) instruction of use and RMM on the label (washing on hands after use)</li> <li>(↓) Low exposure duration (less than one hour per day)</li> <li>(↓) Practically no exposure</li> <li>(↑) moderate frequency</li> </ul>		
LOW	Eye Irrit. Cat 2 (H319)	and 4	loading	Eyes	Mixing and loading = 1.33 min	Eye exposure through potential splashed or hand-to-eye transfer (2.6% avCl)	and storage - "Washing on hands after use"  Packaging: - Child-proof closure	Acceptable	<ul> <li>(↑) Formulation (liquid formulation to be diluted, no viscious formulation limitating splashes)</li> <li>(↓) child-proof closure</li> <li>(↓) no children or infant exposure</li> </ul>		

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Outcome of qualitative local risk assessment for disinfection of surfaces by mopping or wiping by non-professional users: Products from Meta-SPC 2, 5 and 8 and diluted products of meta-SPC 5 and 8 are skin corrosive and eye damage

Hazard		Exposure information				Risk			
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)
HIGH	Skin Corr. Cat 1 (H314)	2 and 4	Mixing and loading	Skin	Frequency: no data  Duration:  Mixing and loading = 1.33 min	Skin exposure through potential liquid spills around the opening of the bottle and/or due to splashes of the liquid	<u>None</u>	Not acceptable	<ul> <li>(↓) instruction of use and RMM on the label (washing on hands after use)</li> <li>(↓) Low exposure duration (less than few minutes per day)</li> </ul>
						concentrate (2.6 to 14.5% avCl)			(↑) Formulation (liquid formulation to be diluted, no

HIGH	Eye Dam. Cat 1 (H318)	Eyes	Eye exposure through potential splashed or hand-to-eye transfer (2.6 to 14.5% avCl)	viscious formulation limitating splashes)  (↑) moderate frequency (equal to or less than once per week cannot be ensure)  (↑) Exposure to corrosive substance
				(†) Mode of application (the product should be loaded undiluted a first time for measurement and then in a bucket leading to an increase of potential dermal exposure through spills and splashes)
				<ul><li>(↓) child-proof closure</li><li>(↓) no children or infant exposure</li><li>The uncertainties that may</li></ul>
				decrease the risk are the following:  (↓) Modification of the formulation to avoid the M&L task (diluted solution with no classification) and/or to reduce splashes;

<fr></fr>	<biocidal based="" family="" on="" product="" sodium<br="">HYPOCHLORITE&gt;</biocidal>	<pt 2,="" 4=""></pt>	
			<ul><li>(↓) Other packaging;</li><li>(↓) Restriction of the use frequency</li></ul>

Application (meta-SPC 5 and 8)

Hazard	Hazard		Exposure information					Risk	Risk	
Hazard category	Effects in terms of C&L	PT	Tasks, uses, processes	Potential exposure route	Frequency and duration of potential exposure	Potential degree of exposure	Relevant PPE and RMMs	Conclusion on risk	Uncertainties attached to conclusion that may increase (↑) or decrease (↓) risk or both (↑↓)	
HIGH	Skin Corr. Cat 1 (H314)	2 and 4	Application	Skin	Frequency: no data Duration: Application no data	Dermal contact (0.8 and 0.82% avCl)	<u>None</u>	Not acceptable	<ul> <li>(↓) instruction of use and RMM on the label (washing on hands after use)</li> <li>(↑) Moderate exposure duration (less than few minutes per day cannot be ensure)</li> </ul>	

				(†) moderate frequency (equal to or less than once per week cannot be ensure)
HIGH	Eye Dam. Cat 1 (H318)	Eyes	Eye exposure through potential splashed or hand-to-eye transfer (0.8 and 0.82% avCl)	<ul> <li>(↑) Exposure to corrosive substance</li> <li>(↑) Mode of application (the user is in direct contact with the diluted product)</li> <li>(↓) child-proof closure</li> <li>(↓) no children or infant exposure</li> </ul>

# Conclusion for Use 2: Disinfection of surfaces by wiping with a mop / cloth and bucket (Meta-SPC 1, 2, 5 and 8)

For products pertaining to **Meta-SPC 1**, risk is acceptable considering the qualitative risk assessment for local effects with the application of risk mitigation measures (RMM):

- Washing on hands after use

For products pertaining to **Meta-SPC 2, 5 and 8**, risk is not acceptable considering the qualitative risk assessment for local effects.

## > NA-MIC minor change application (2022)

The minor changes have no impact on the human health risk assessment.

## Secondary exposure - Exposure of the general public

Scenario [5]: Inhalation exposure of the bystander

#### **Description of Scenario [5]**

Bystander present during the mixing and loading, application or rinsing step can be exposed by inhalation. This exposure phase is considered covered by inhalation exposure during application since greater exposure is not expected for bystander.

<u>Scenario [6]: Dermal exposure of the general public to the wet product and oral exposure due to hand-to-mouth transfer</u>

# Description of Scenario [6]: Dermal exposure of the general public to the wet product and oral exposure due to hand-to-mouth transfer

General public can touch the wet surface during the contact time of the dilution for meta SPC 1, 2, 5 and 8 or RTU product for meta-SPC 3.

Infant after touching the wet surface can be exposed orally to avCl after hand to mouth transfer.

Content of avCl in the dilution for meta-SPC 1, 2, 5 and 8 ranges between 0.80% w/w and 0.86% w/w. The maximum concentration of 0.86% w/w of available chlorine in the diluted product is used for meta-SPC 1, 2, 5 and 8. The concentration of available chlorine is 1.5% w/w in the RTU products for meta-SPC 3.

Tier	Parameters	Value	Source
Tier 1	Max sodium hypochlorite concentration in dilution (%w/w avCl)	0.86% (Meta-SPC 1, 2, 5 and 8)	Applicant's data
	Sodium hypochlorite concentration in RTU product (%w/w avCl)	1.5% (Meta-SPC 3)	Applicant's data

#### **Risk characterisation**

# **Bystander / General public**

Local effects (sodium hypochlorite)

o Quantitative risk assessment – Inhalation exposure

#### **All Meta-SPC**

Inhalation exposure of the bystander is the same as the inhalation exposure of the user (see primary exposure).

For all meta-SPC, the estimated inhalation concentration is below the AEC of sodium hypochlorite for all scenarios.

o Qualitative risk assessment (dermal and oral exposure)

Products of Meta-SPC 2, 5 and 8 are classified skin corrosive (H314) and severe eye damage (H318), as well as diluted products of meta-SPC 5 and 8, and products of meta-SPC 1 and 3 are classified skin irritant (H315) and eye irritant (H319). Therefore the following risk mitigation measures are required:

- Do not touch the surface until it is totally dried;
- Children should not be present during disinfection

## Disinfection by-products exposure

DBP can be formed during the different uses. However no data is available regarding the identity and content of these DBP and no guidance is available for these uses. In this context non risk assessment can be performed.

## Monitoring data

[Please add any information on surveys or studies with the actual product or with a surrogate.]

#### Dietary exposure

By definition PT2 biocidal product is for application on surfaces that are not used for direct contact with food or feeding stuffs. Therefore, residues in food or feed are not expected.

**Sodium hypochlorite** is widely used for disinfection of surfaces and equipment in food and feed processing areas as well as for disinfection of drinking water, and thus, chlorate residues can be carried-over into food and feed during cleaning, washing and processing steps. Hence a dietary exposure assessment is presented below.

Residue definitions

#### Nature of residue:

Due to the high reactivity of chlorine species, residues on surfaces degrade very rapidly (decomposition to physiological sodium and chloride). Hence, residue formation is assumed to be negligible for aqueous solutions of Na(OCI). Finally, no systemic assessment is required for substances such as Na(OCI) which act by a local mode of action only.

The BPC TOX-WG-IV-2016 concluded that chlorate residues may still be relevant as chlorate is considered a stable metabolite. Sodium chlorate is a by-product of the manufacturing process and can be formed during storage. Thus, chlorate may represent a worst-case for Na(OCI).

Furthermore, at EU level (WG TOX III-2016) it was finally discussed that only **chlorates**  $(ClO_3^-)$  is relevant for the dietary risk assessment. This relevant residue can be present in the BP as impurity and can be generated as Disinfection By Products (DBP) or degradation of the active ingredient in the biocidal product upon storage. Consequently, chlorates is a relevant compound to assess for food, feed and drinking water.

# List of scenarios

Please note that the applicant has developed an approach to estimate the risk for consumer via drinking water consumption. This approach have been considered as not relevant by eCA. This assessment is presented in Annex Residue §3.4 as informative data.

	Summary table: scenarios							
Scenario number	Scenario (e.g. mixing/ loading)	Use	Primary or secondary exposure Description of scenario	Exposed group (e.g. professionals, non- professionals, bystanders)				
DRA-1	Professional PT 4 use - Indirect exposure via food	-Disinfection of surfaces by spraying: hard surface (utensils, equipment and furniture) - Disinfection of surfaces (floors, utensils, equipment and furniture) by wiping with mop/cloth and bucket	Secondary Exposure to food in contact with treated surfaces	General public				
DRA-2	Non Professional PT 4 use - Indirect exposure via food	-Disinfection of surfaces by spraying: hard surface (utensils, equipment and furniture) - Disinfection of surfaces (floors, utensils, equipment and furniture) by wiping with mop/cloth and bucket	Secondary Exposure to food in contact with treated surfaces	General public				

## Information of non-biocidal use of the active substance

Summary table of other (non-biocidal) uses					
Sector of Intended use Reference value(s)					
	use				
1.	Plant	Disinfectant – in irrigation water	ADI: 0.15 mg/kg bw/d		
	protection	applied by watering tree – indoor	ARfD: not applicable		

Summary table of other (non-biocidal) uses					
		Not approved as a PPP active	Default MRL of 0.01 mg/kg		
		substance.	according to Art 18(1)(b) Reg		
			396/2005.		

Estimating Livestock Exposure to Active Substances used in Biocidal Products

Not relevant.

<u>Estimating transfer of biocidal active substances into foods as a result of professional and/or industrial application(s)</u>

#### Scenario DRA-1:

With regards to professional intended PT 4 use, dietary exposure to available chlorine and chlorate in food was assessed and considered acceptable in the CAR<sup>5</sup>. This refers to the EFSA Scientific Opinion of the EFSA CONTAM Panel on "*Risks for public health related to the presence of chlorate in food*" (EFSA Journal 2015;13(6):4135) which includes a comprehensive dietary exposure and risk assessment for chlorate residues in food and drinking water based on occurrence data. The conclusion of this assessment remains valid for intended professional PT 4 uses:

"Potential chlorate residues from the application of chlorine and hypochlorite in PTs 4 and 5 are considered to be included in the measured chlorate residue values, and the conclusions drawn by the EFSA CONTAM Panel on chlorate residues cover thus also the dietary risk arising from PT4 and PT5 uses of chlorine and hypochlorite. Since the EFSA Scientific Opinion on chlorate residues provides actual measured data for chlorate residues in food and an exhaustive exposure and risk assessment based on consumption data, the conclusions drawn in the EFSA Scientific Opinion are superior to any dietary risk assessment based on exposure models."

Consequently, no dietary risk assessment is deemed necessary for the intended PT 4 professional uses.

<u>Estimating transfer of biocidal active substances into foods as a result of non-professional use</u>

#### **Scenario DRA-2:**

After non professional PT 4 use, general public may be exposed to chlorate residue by consumption of food that could have been in contact with treated surfaces.

<sup>5</sup> Assessment report, January 2017 – Active chlorine released from sodium hypochlorite. Italy

Dietary exposure assessment has been performed according to ECHA guidance document<sup>6</sup> for adults only. Indeed, as detailed in ECHA guidance document<sup>7</sup>, default value of 0.2 m<sup>2</sup> for parameter "area in contact with food" is "derived for adults; flexibility can be applied in regard to the value to be used for toddlers to allow for different or lower food consumption". Therefore, detailed scenario exposure is not representative of toddler food intake.

A rinsing step was considered, and indirect exposure via food was performed for two tiers:

- Tier-I (without rinsing of treated surfaces);
- Tier-II (with rinsing of the treated surfaces).

In the absence of measured residue data, the assumption was made that 10% (Tier-IIa) or 1% (Tier-IIb) of chlorate residues remain on the treated surface after rinsing, while 90% or 99%, respectively, of chlorate residues are flushed. This is considered realistic, as chlorate is highly soluble in water: for sodium chlorate, a solubility of 960-1000 g/L is described (EFSA CONTAM Panel, 2015. Scientific Opinion on risks for public health related to the presence of chlorate in food. EFSA Journal 2015; 13:4135).

It is noticed that chlorate residue formation may depend on the formulation of the products as well as on the storage conditions of the product.

Table below summarizes final chlorate concentration in diluted biocidal product among all intended meta SPC for PT4 use disinfection of surfaces in contact with food for non professional.

# Table: final chlorate concentration in diluted biocidal product among all intended meta SPC for PT4 use disinfection of surfaces in contact with food for non professional use

	Non professional - Disinfection of surfaces in contact with food by spraying						
	<b>Meta SPC</b>						
	1	2	2	2	3	5	8
Available chlorine eq Cl <sub>2</sub> (%w/w)	2.6	9.6	12.5	14.5	1.5	4.9	2.6
Chlorate (%w/w) after storage	0.139	1.31	1.61	2.22	0.062	0.493	0.136
Dilution of biocidal product	0.3	0.075	0.055	0.05	1	0.15	0.3
Density	1.052	1.18	1.218	1.242	1.028	1.091	1.051
Chlorate final concentration (%)	0.0439	0.1159	0.1079	0.1379	0.0637	0.0807	0.0429
Chlorate final concentration (mg/L)	438.68	1159.35	1078.54	1378.62	637.36	806.79	428.81

<sup>&</sup>lt;sup>6</sup> Guidance on the Biocidal Products Regulation - Volume III Human Health - Assessment & Evaluation -(Parts B+C) - 5. Guidance on Estimating Dietary Risk from Transfer of Biocidal Active Substances into Foods – Non-professional Uses -Version 4.0 December 2017

Guidance on the Biocidal Products Regulation - Volume III Human Health - Assessment & Evaluation - (Parts B+C) - 5.
Guidance on Estimating Dietary Risk from Transfer of Biocidal Active Substances into Foods – Non-professional Uses -Version 4.0 December 2017

	-	Non professional - Disinfection of surfaces in contact with food by wipping/mopping					
	Meta SPC						
	1	2	2	2	5	8	
Available chlorine eq Cl <sub>2</sub> (%w/w)	2.6	9.6	12.5	14.5	4.9	2.6	
Chlorate (%w/w) after storage	0.139	1.31	1.61	2.22	0.493	0.136	
Dilution of biocidal product	0.3	0.075	0.055	0.05	0.15	0.3	
Density	1.052	1.18	1.218	1.242	1.091	1.051	
Chlorate final concentration (%)	0.0439	0.1159	0.1079	0.1379	0.0807	0.0429	
Chlorate final concentration (mg/L)	438.68	1159.35	1078.54	1378.62	806.79	428.81	

The highest chlorate concentration is used for indirect exposure via food calculation presented below.

Table: Parameters and input values for scenario DRA-2

Description	of Scenario [DRA-2]		
	Parameters	Value	Reference/remarks
Tier I	In-use concentration chlorate (C)	1378.62 mg/L	BIOCIDAL PRODUCT FAMILY intended uses
	Water film thickness on treated surfaces	0.002 cm	Guidance on BPR: Volume III Parts B+C Version 4.0 December 2017) (1)
	Volume expected considering the water film thickness on treated surfaces (V)	0.02 L/m <sup>2</sup>	
	Biocide residues on surface (Rsurface)	27.57 mg/m <sup>2</sup>	Rsurface = CxV
	Area in contact with food (A food contact)	0.2 m <sup>2</sup>	Guidance on the BPR: volume III P art B+C, Version 4.0 December 2017 - Default value for surface treatment, acute/ chronic exposure
	Dietary Intake Fraction: Acute/chronic exposure (D)	1 / 0.5	Guidance on BPR: Volume III Parts B+C Version 4.0 December 2017
	Default Body weight (kg) adults (bw)	60 kg	Guidance on BPR: Volume III Parts B+C Version 4.0 December 2017
	Mass transfer efficiency (TF)	1	Guidance on BPR: Volume III Parts B+C Version 4.0 December 2017 - Default value (worst case)
	Remaining residues on treated surfaces after a rinsing step Tier I (RF)	100%	Default rinsing factor
Tier IIa/IIb	Remaining residues on treated surfaces after a rinsing step Tier IIa/ Tier IIb (RF)	10% / 1%	Default rinsing factor

<sup>(1)</sup> Guidance on the Biocidal Products Regulation - Volume III Human Health - Assessment & Evaluation -(Parts B+C) - 5. Guidance on Estimating Dietary Risk from Transfer of Biocidal Active Substances into Foods – Non-professional Uses - Version 4.0 December 2017

# **Calculations for Scenario [DRA-2]**

Following equation has been used to estimate adult, chronic/acute consumer exposure in both Tier I and Tier IIa/Tier IIb:

 $Exp_{cons} = R_{surface} \times A_{food contact} \times TF \times D \times RF \div bw$ 

#### Table: Estimation of consumer exposure via food for scenario DRA-2

Exposure scenario	Tier	Exposure	Adult
	<b></b> .	Estimation of consumer exposure via food (acute exposure) (mg/kg bw)	0.0919
	Tier I	Estimation of consumer exposure via food (chronic exposure) (mg/kg bw)	0.0460
Scenario	Tier IIa	Estimation of consumer exposure via food (acute exposure) (mg/kg bw)	0.0092
[DRA-2]		Estimation of consumer exposure via food (chronic exposure) (mg/kg bw)	0.0046
	Tier IIb	Estimation of consumer exposure via food (acute exposure) (mg/kg bw)	0.0009
		Estimation of consumer exposure via food (chronic exposure) (mg/kg bw)	0.0005

#### Conclusion

For non-professional PT 4 uses, dietary exposure assessment has been performed according ECHA guidance document<sup>8</sup> for adults only.

#### Risk for consumers via residues in food

# Maximum residue limits or equivalent

MRLs or other relevant reference values	Reference	Relevant commodities	Value
Drinking water limit -	WHO, 2005	Drinking water	0.7 mg/L
chlorate	WHO/SDE/WSH/05.08/869		

<sup>&</sup>lt;sup>8</sup> Guidance on the Biocidal Products Regulation - Volume III Human Health - Assessment & Evaluation -(Parts B+C) - 5. Guidance on Estimating Dietary Risk from Transfer of Biocidal Active Substances into Foods – Non-professional Uses -Version 4.0 December 2017

<sup>&</sup>lt;sup>9</sup> WHO, 2005. Chlorite and chlorate in drinking-water. Background document for development of WHO Guidelines for drinking-water quality. WHO/SDE/WSH/05.08/86

	Water Directive Proposed limit (EC 2020 <sup>10</sup> )	Drinking water with disinfection method	
Drinking water limit – chlorate	Water Directive Proposed limit (EC 2020 <sup>11</sup> )	Drinking water except for disinfection method	0.25 mg/L
MRL chlorate - Reg. (EU) 2020/749	MRL fixed based on monitoring data and target sampling on Food commodities	Raw food commodities plant matrices	From 0.05 to 0.7 mg/kg
	MRL fixed based on monitoring data and target sampling on Food commodities	Raw food commodities animal matrices	Muscle: 0.05 mg/kg Fat: 0.1* mg/kg Liver: 0.05 mg/kg Kidney:0.05 mg/kg Edible offals: 0.05 mg/kg
			Milk: 0.1 mg/kg Eggs: 0.05 mg/kg

The applicant should inform professional users of the product of the existence of MRLs for chlorates. They may be held liable if these MRLs are exceeded during controls carried out on foodstuffs that have been in contact with surfaces treated with a product from the BIOCIDAL PRODUCT FAMILY.

#### Risk for consumers via residues in food

For intended PT 4 non professional use, dietary risk assessment has been performed according ECHA guidance document<sup>12</sup> for adults only and results are detailed below:

 $<sup>^{10}</sup>$  EC, 2020: Directive (EU) 2020/2184 of the european parliament and of the council of 16 December 2020 on the quality of water intended for human consumption.

<sup>&</sup>lt;sup>11</sup> EC, 2020: Directive (EU) 2020/2184 of the european parliament and of the council of 16 December 2020 on the quality of water intended for human consumption.

<sup>&</sup>lt;sup>12</sup> Guidance on the Biocidal Products Regulation - Volume III Human Health - Assessment & Evaluation - (Parts B+C) - 5.
Guidance on Estimating Dietary Risk from Transfer of Biocidal Active Substances into Foods – Non-professional Uses -Version 4.0 December 2017

## Table: risk calculation for intended PT4 use "Disinfection of surfaces in contact with food" for non professional use

	Risk for consumers via residues in food						
		Scenario DRA 2: Non professional PT 4 use					
	Dietary exposure (mg/kg bw/d)			Dietary Risk % of ADI (0.003 mg/kg b.w./d) or ARfD (0.036 mg/kg b.w.)			
	Tier I Tier IIa Tier IIb		Tier I	Tier IIa	Tier IIb		
Adult (chronic)	0.0460	0.0046	0.0005	1531.8	153.2	15.3	
Adult (acute)	0.0919	0.0092	0.0009	255.3	25.5	2.6	

## Conclusion

For non-professional PT 4 uses:

- in Tier I: Indirect exposure via food is above toxicological reference values
- in Tier IIa: Indirect exposure via food is above ADI
- in Tier IIb: Indirect exposure via food is below toxicological reference values

As a conclusion, no concern for general public from indirect exposure to either available chlorine or chlorate in food is observed when a rinsing of treated surfaces occurs.

# Risk characterisation from combined exposure to several active substances or substances of concern within a biocidal product

[Please, refer to Guidance for Human Health Risk Assessement, Volume III, Part B - to characterise the risk in case of exposure to several active substances or substances of concern within a product]

#### 2.2.7 Risk assessment for animal health

The risk for animal health is covered by the risk for the general public and therefore is considered acceptable.

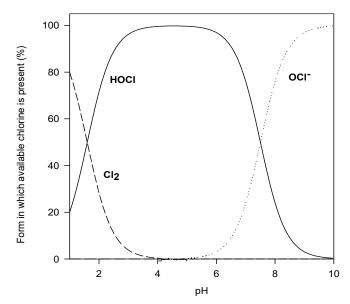
#### 2.2.8 Risk assessment for the environment

Products of the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE are PT2 and 4 disinfectants. They are applied for:

- <u>PT2/4</u> Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture): The products are applied to surfaces by spraying (Meta SPC 1, 2, 3, 5, 8). Product emissions occur to the STP.
- <u>PT2/4</u> Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket.: The products are used wiping (Meta SPC 1, 2, 3, 5, 8). Product emissions occur to the STP.

## Active substance

The active substance within the product family is active chlorine released from sodium hypochlorite (CAS: 7681-52-9). According to the active substance's assessment report (2017), hypochlorous acid (HClO) is in equilibrium with the hypochlorite ion (ClO-) and chlorine (Cl2). The equilibrium depends on the pH value: chlorine is available below pH 4, in the neutral pH range hypochlorous acid is predominant, and at pH values higher than 10, the only species present is the hypochlorite ion, see figure below.



The sum of these species [hypochlorite ion + hypochlorous acid + chlorine] is defined as active chlorine or available chlorine. For the chemical reactivity in aqueous solution with the same active chlorine concentrations and the same pH conditions, it is irrelevant whether active chlorine is generated from either chlorine gas, calcium hypochlorite or sodium hypochlorite. Therefore, all studies investigating hypochlorite aqueous solutions can be used for evaluation and assessment of active chlorine released from any of the three substances.

TRC (total residual chlorine) is a measurement of both Free Available Chlorine or FAC (in practice, only HClO and  $OCl^-$  are usually present because  $Cl_2$  is formed only at pH < 4) and combined chlorine (such as chloramines). It is difficult to separate the contribution to toxicity of FAC from that of the combined chlorine species. For studies where the percentage of FAC in TRC was measured, the toxicity endpoints were expressed as FAC/L as well.

Available chlorine (or free chlorine) is expressed as equivalent content of  $\text{Cl}_2$  (AR, 2017). The active chlorine equivalent content is:

- 1 g of sodium hypochlorite is equivalent to 0.953 g active chlorine ( $MW_{Cl2}$  /  $MW_{NaClO}$  = 71/74.5)
- or 1 g active chlorine equivalent to 1.05 g sodium hypochlorite ( $MW_{NaClO}$  /  $MW_{Cl2}$  = 74.5 / 71).

#### Substance of Concern

One substance of concern has been identified for the environment: Dodecanetrile (CAS  $n^{\circ}$  2437-25-4) and a complete risk assessment has been performed (see confidential annex for further details on the identification). This substance of concern is relevant for meta-SPC 8 only.

## Chlorate formation during storage

The maximal sodium chlorate content at the end of storage exceeds the reference specification for the Meta-SPC 1, 2, 3, 5 & 8 (ranging from 6.04 to 76.76% w/w between

the different Meta-SPC, while the limit is 5.4% w/w (refer to section 2.2.2). Consequently, a risk assessment of chlorate formed during storage is needed for these Meta-SPC.

No harmonized endpoints are actually available for chlorate. As agreed during the WG-I-2020-Part B meeting, considering that chlorate ( $EC_{50} = 10 \text{ mg/L}$ ) is less toxic than the active substance ( $EC_{50} = 0.023 \text{ mg}$  free available chlorine/L), it can be assessed qualitatively for all the environmental compartments including groundwater.

Chlorate is a substance of concern in relation to human health. Then, a semi qualitative assessment of chlorate in groundwater and surface water intended for the abstraction of drinking water have been performed (worst case assessment based on the maximal chlorate concentration, *i.e.* at the end of the storage period, as proposed for the HH assessment).

#### Disinfection by-products (DBPs)

An environmental risk assessment of DBPs has been provided by the applicant. A summary of the evaluation is given in Annex 3.7. The risk assessment is still under development and will be amended as agreement on PNEC values and exposure concentrations of DBPs are agreed at Working Group level. Indeed, a harmonization of the environmental risk assessment for DBPs is currently under investigation at EU level. Consequently, and according to the WG-I-2020 Part B meeting agreements, any conclusion on the risk of DBPs for the environment cannot be drawn for the time being.

#### **2.2.8.1** Effects assessment on the environment

According to the active substance's assessment report (2017), short and long term toxicity data from literature are available for fish, invertebrates, algae and micro-organisms, resulting from flow-through or static tests. Most tests with a static test design result in a factor of 100-500 higher end-points (NOEC, LC50) than studies performed according to a flow-through design. Due to very fast hypochlorite decay, a static test system is continuously exposed to the same hypochlorite concentration. When data from literature were considered not valid or incomplete for the risk assessment, new toxicity laboratory studies were performed and included in the CAR.

No new environmental studies have been conducted on the products. All agreed endpoints have been taken from the final Assessment Report Active substance released from sodium hypochlorite in water (2017). The predicted no effect concentration values (PNEC) are summarised in the table below:

PNEC	Lowest endpoint	AF PNEC		Test/species			
	Free available chlorine (FAC)						
STP	NOEC: 41.1 mg/L	10	4.11 mg FAC/L	Respiration inhibition test			
fresh water	NOEC: 2.1 μg/L	50	0.042 FAC μg/L	Algae			
sediment	-	1	0.045 μg FAC/kg wwt	Equilibrium partitioning from aquatic data using a theoretical $K_{oc}$ of 13.22			
soil	-	-	0.015 μg FAC/kg wwt				

			according to the Guidance part B, vol. IV.
groundwater	Reference value for grou	ndwater = 0.1 μg/L	
atmosphere	At environmental pH (6.5 the non-volatile hypochlo Henry's law constant as ( will be very low and the concern.	orite ion; half as hypoch 0.11 Pa m³/mol. Hence	nlorous acid with a e, the concentration in air
birds	No data available for birds and mammals as primary and secondary poisoning is not considered relevant.		

Concerning the assessment of the substance of concern identified for the environment (Dodecanenitrile; CAS n° 2437-25-4), the PNECS have been taken from the REACH registration dossier:

https://echa.europa.eu/fr/registration-dossier/-/registered-dossier/20698

PNEC	Lowest endpoint	AF PNEC		Test/species			
Dodecanenitrile							
STP	0.013 mg/L	10	1.30E-03 mg/L	Toxicity to micro-organisms study was conducted on Tetrahymena pyriformisstrain GL for 40 hrs. AF for EC50 from a ciliate growth inhibition test			
freshwater	0.059 mg/L	1000	5.90E-05 mg/L	A chronic study was available for algae, but not for fish and invertebrate, in which only QSAR were available. Therefore, according to the Volume IV, Part B+C, a factor 1000 is applied to the lowest L(E)C50 (in our case invertebrates: EC50=0.059mg/L) to calculate the PNEC.			
sediment 0.0452 mg/kg wwt (not used as risk is covered by freshwater asssessment)		Equilibrium partitioning calculated according to the Guidance part B, vol. IV.					
soil	-	-	0.0362 mg/kg wwt				
groundwater	Reference value for groundwater = 0.1 µg/L						
atmosphere	Air is not an environmental compartment of concern.						
birds	Primary and secondary poisoning are not assessed, as no data are available						

In absence of other data available, these PNECs are taken into account for the environmental risk assessment.

# Information relating to the ecotoxicity of the biocidal product which is sufficient to enable a decision to be made concerning the classification of the product is required

All relevant data can be extrapolated from the active substance Active chlorine released from sodium hypochlorite (AR, 2017). Testing of the product is not required.

The products contains classified ingredients other than the active substance (active chlorine released from sodium hypochlorite). However, the classification of the co-formulants included in the different META-SPC does not lead to additional classification (refer to the confidential PAR for detail).

Thus, the environmental hazard classification of the products is driven by the active substance classified as **Aquatic Acute 1**, **H400** (**M=10**), **Aquatic chronic 1**, **H410** (**M=1**) according to the Regulation (EC) No 1272/2008 (CLP). The classification **H400**, **H411** applies to all the META-SPC within the family considering a concentration of the active substance in products between 25 and 2.5%, except for meta-SPC 3 which is classified **H412** (concentration of the active substance = 1.5%).

## Further Ecotoxicological studies

No further ecotoxicological studies have been conducted on active chlorine or the active chlorine releasing product supported in this document.

# Effects on any other specific, non-target organisms (flora and fauna) believed to be at risk (ADS)

No new data is available for BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Supervised trials to assess risks to non-target organisms under field conditions

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Studies on acceptance by ingestion of the biocidal product by any non-target organisms thought to be at risk

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Secondary ecological effect e.g. when a large proportion of a specific habitat type is treated (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Foreseeable routes of entry into the environment on the basis of the use envisaged

See Fate and distribution in exposed environmental compartments.

#### Further studies on fate and behaviour in the environment (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Leaching behaviour (ADS)

The performance of a study on leaching (e.g. from treated surfaces) is neither applicable nor relevant for the intended uses within PT1-5.

# Testing for distribution and dissipation in soil (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

## Testing for distribution and dissipation in water and sediment (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

# Testing for distribution and dissipation in air (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

If the biocidal product is to be sprayed near to surface waters then an overspray study may be required to assess risks to aquatic organisms or plants under field conditions (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

If the biocidal product is to be sprayed outside or if potential for large scale formation of dust is given then data on overspray behaviour may be required to assess risks to bees and non-target arthropods under field conditions (ADS)

No new data is available for the BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE.

#### **2.2.8.2** Exposure assessment

General information

Assessed PT	PT 2
Assessed scenarios	Scenario 1 – Disinfection in institutional areas
Assessed scendings	<ul> <li>Scenario 2 – Disinfection in industrial areas</li> </ul>
ESD(s) used	<ul> <li>Emission Scenario Document for Product Type 2:         Private and public health area disinfectants and other biocidal products (sanitary and medical sector), P. van der Poel, 2001.</li> <li>ESD for PT 2: Emission Scenarios for private and public health area disinfectants and other biocidal products (RIVM, 2001)</li> <li>TAB ENV v2 ENV-55</li> </ul>
Approach	<ul><li>Scenario 1: Average consumption</li><li>Scenario 2: Average consumption</li></ul>
	Estimated according to :  • Guidance on the Biocidal Products Regulation, Vol. IV.
Distribution in the	Env, Parts B+C, Version 2.0 (October 2017).
environment	Assessment report: Active chlorine released from
	sodium hypochlorite, Product-type 2, January 2017.
Construction simulation	Technical Agreements for Biocides, 2021.
Groundwater simulation	No
Confidential Annexes	Yes
Life cycle steps assessed	Product use
Remarks	-
Assessed PT	PT 4
Assessed scenarios	<ul> <li>Scenario 1 - Disinfection in large scale catering kitchens, canteens, slaughterhouses and butcheries (2006)</li> <li>Scenario 2 - Assessment of private use of disinfectants used in food and feed areas</li> </ul>
ESD(s) used	ESD for PT 4: Emission scenarios for Disinfectants used in food and feed areas (JRC Scientific and Technical Reports, 2011)
Approach	<ul><li>Scenario 1: Average consumption</li><li>Scenario 2: Average consumption</li></ul>
Distribution in the environment	<ul> <li>Estimated according to:         <ul> <li>Guidance on the Biocidal Products Regulation, Vol. IV.</li> <li>Env, Parts B+C, Version 2.0 (October 2017).</li> </ul> </li> <li>Assessment report: Active chlorine released from sodium hypochlorite, Product-type 2, January 2017.</li> <li>Technical Agreements for Biocides, 2021.</li> </ul>
Groundwater simulation	No
Confidential Annexes	No
Life cycle steps assessed	Product use

<BIOCIDAL PRODUCT FAMILY BASED ON SODIUM HYPOCHLORITE>

<PT 2, 4>

<FR>

Remarks	l <del>-</del>

#### Emission estimation

The calculated daily emission of active chlorine to the sewage treatment plant does not take into account a degradation of the active substance in the sewer system. Standard biodegradability testing in the STP is not applicable to inorganic substances such as NaClO. However, the active substance assessment reports indicates that "Active chlorine is highly reactive: it reacts rapidly with organic matter in the sewer, STP, surface water, and soil. Where organic and nitrogenous materials are present, it acts as a highly reactive oxidizing agent. After reaction with organic matter, most ( $\approx 99\%$ ) of the active chlorine is converted to inorganic chloride. The kinetic model of Vandepitte and Schowanek shows that hypochlorite is eliminated during transport in the sewer within the first minutes. The abundance of reaction partners allows a very quick reaction. The [free chlorine] concentration estimated at the end of the sewer drops below 1 x  $10^{-32}$  µg/L.

Degradation of hypochlorite in the sewer system was therefore considered. Based on the assessment report of active chlorine released from sodium hypochlorite, the DT50 is 56 seconds at 12°C for hypochlorite in the sewer system. This value is used for the emission estimation. No degradation was considered for chlorates.

A sewer residence time of 1h is proposed a default value in the ESD, based upon an average distance of 4.5 km from the point of release to the STP and an estimated flow rate of 1.5 km in 20 minutes in the municipal canal sewer system.

This degradation is taken into account in all relevant uses.

In order to make a worst case risk assessment covering all the relevant META-SPC, a comparison of the different parameters has been done in the table below:

Table 1: Concentrations of substances in the Meta-SPCs

	Substance	Concentration of substance (% w/w)	Dilution factor (worst case)	Density	Concentration in working solution (g/L)
Meta	Active chlorine	2.6	0.3	1.052	8.206
SPC 1	Chlorate	0.139	0.3	1.032	0.439
Meta	Active chlorine	14.5	0.05*	1.242	9.005
SPC 2	Chlorate	2.22			1.379
Meta SPC 3	Active chlorine	1.5	1 (RTU)		15.42
	Chlorate	0.062		1.028	0.637

Meta SPC 5	Active chlorine	4.9	0.15	1.091	8.019
	Chlorate	0.493	0.15		0.807
Meta SPC 8	Active chlorine	2.6	0.2	1 051	8.198
	Chlorate	0.136	0.3	1.051	0.429

<sup>\*</sup>Considering an application rate: 5% to 7.5% v/v dilution in water in function of the active chlorine concentration in each product of Meta-SPC 2 as follows:

- 75 mL of product for 925 mL of water (for the products containing 9.60% w/w of active chlorine),
- 55 mL of product for 945 mL of water (for the products containing 12.50% w/w of active chlorine),
- 50 mL of product for 950 mL of water (for the products containing 14.50% w/w of active chlorine),

the dilution of 5 % of the most concentrated product represents the worst case.

The products of Meta-SPC 3 are used pure. Therefore this Meta-SPC is considered as the worst-case and will be used for the calculations for the active substance and the meta-SPC 2 is considered as the worst-case for chlorates.

#### **Dose for the SoC:**

The substance of concern is only present in Meta-SPC 8 at 0.05% and thus its dose can be estimated: 0.05 %\*0.3\*1.051 g/L = 0.158 g/L (considering the worst dilution and density of the Meta-SPC 8 products).

#### PT2 scenarios

• PT2 - Scenario 1: Disinfection of institutional areas (Meta-SPC 1, 2, 3, 5, 8)

Local emission due to disinfection of lavatory and surfaces were calculated using ESD for PT2 Disinfection in institutional areas (RIVM, 2011). This scenario covers the use Disinfection of hard surfaces (non-professional applications). This assessment covers spraying and wipping. Only the consumption approach is presented as it is considered more relevant than tonnage approach. In fact the tonnage scenarios are not the worst case as they report only the active substance and not chlorates and substances of concern.

The average consumption is presented below:

Input parameters for calculating the local emission					
Input	Value	Unit	Remarks		
Consider A. Annual and the Control of the Control o					

Scenario 1 – Average consumption, Emission scenario for calculating the releases of disinfectants used for sanitary purposes based on average consumption (ESD PT2, 2001, p.10)

Number of inhabitants feeding one STP [Nlocal]	10 000		-	Default value (ESD PT2, 2001)	
Fraction released to waste water [Fwater]	1		-	Default value (ESD PT2, 2001)	
Substance in product [Cproduct] Active chlorine Chlorate SoC	1.54E+01 1.38E+00 1.58E-01		g/l	See Table :	
Consumption per capita [Qproduct]:	0.007		l/cap. d	Default value for general purposes+Lavatory(ESD PT2, 2001)	
Penetration factor of disinfectant [Fpenetr]	0.5		-	Default value (TAB, 2017)	
Output	•		•		
Calculation: Elocalwater = Nlocal * Qproduct * Cproduct * Fpenetr * Fwater					
Emission rate to wastewater (standard STP)	kg/d Elocalwater			5.40E-01	As Active chlorine eq Cl2
Emission rate to wastewater (standard STP)	kg/d Elocalwater			4.83E-02	As Chlorate
Emission rate to wastewater (standard STP)	kg/d Elocalwater			5.52E-03	As SoC

Calculation after degradation of active chlorine in sewer before the STP:

Calculation:	
$M_{t1} = M_{t0}^* EXP^{(-k * t1)}$	Elocal <sub>water</sub> = 2.40E-20 kg av Cl/d
$M_{t1}$ = total amount of substance present at time 1 [kg/d] $M_{t0}$ = total amount of substance at time 0 [kg/d] $k$ = rate constant ( $k$ = 44.56 $h^{-1}$ , calculated from the DT <sub>50</sub> at 12°C: ln2/DT <sub>50</sub> ) $t$ 1 = time [h] (= 1 h)	

Considering the very low emission rate to the STP because of the degradation of hypochlorite in the sewer systems, further calculations are not necessary and a qualitative assessment is proposed as stated at WGI2020.

# PT2 - Scenario 2: Disinfection of industrial premises (Meta-SPC 1, 2, 3, 5, 8)

Local emission due to disinfection of industrial areas were calculated using ESD for PT2 Disinfection in industrial premises (RIVM, 2011). This scenario applies to disinfection of a wide range of surfaces: small surfaces such as furniture and bigger surfaces such as rooms, walls or floors. Industrial premises are considered as local emission sources which release their wastewater to a local STP.

This scenario covers the use "Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket." and "Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture)" by professionnals.

The scenario is based on the concentration of the active substance and volume applied on a surface: an application rate of  $0.1\ L/m^2$  (based on Technical Agreements for Biocides Environment (ENV) Version 2.1, December 2019, in case of absence of more specific information) was considered for the assessment. A surface area of 1000 m² was assessed as it represents a worst-case according to the ESD.

<u>Input parameters for the emission scenario - Disinfection of surfaces, walls, floors, tools, instruments, equipment and other objects in industrial areas by professionals</u>

Variable/parameter	Unit	Symbol	S/D/O/P	Value	Remark
Application rate of biocidal product	l/m²	Vform	S	0.1	
Concentration of : Active chlorine Chlorate SoC	g/l	Cform	S	1.54E+01 1.38E+00 1.58E-01	See Table 1
Surface area to be disinfected	m²	AREA <sub>surface</sub>	D	1000	
Number of applications per day	d <sup>-1</sup>	Nappl	D	1	
Fraction of substance disintegrated during or after application (before release to the sewage system)	[-]	Fdis	D	0	
Fraction released to wastewater	[-]	F <sub>water</sub>	D	1	

#### Output:

<del>Output.</del>							
Calculations:							
Elocal <sub>water</sub> = V <sub>form</sub> * C <sub>form</sub> * ARE	Asurface * I	N <sub>appl</sub> * (1-F <sub>di</sub>	s) * F <sub>water</sub> / 1	1000			
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.54E+00	As Active chlorine eq Cl2			
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.38E-01	As Chlorate			
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.58E-02	As SoC			

Calculation after degradation of active chlorine in sewer before the STP:

Calculation:	Elocal <sub>water</sub> = 6.85E-20 kg av Cl/d
$M_{t1} = M_{t0} * EXP^{(-k * t1)}$	

 $M_{t1}$  = total amount of substance present at time 1 [kg/d]  $M_{t0}$  = total amount of substance at time 0 [kg/d] k = rate constant (k = 44.56 h<sup>-1</sup>, calculated from the DT<sub>50</sub> at 12°C: ln2/DT<sub>50</sub>) t 1 = time [h] (= 1 h)

Considering the very low emission rate to the STP because of the degradation of hypochlorite in the sewer systems, further calculations are not necessary and a qualitative assessment is proposed as stated at WGI2020.

### PT4 scenario

 PT4 - Scenario 1: Disinfection in large scale catering kitchens, canteens, slaughterhouses and butcheries (Meta-SPC 1, 2, 3, 5, 8)

This scenario covers the use "Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket." and "Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture)" for both professionnals and non-professionnals. The local emission is based on the application rate of disinfectant per  $m^2$  (0.1 L/m2 by default) and the area of the treated surface. The main fraction of residues is released to the sewer system.

### Elocal calculation for Scenario 1

The local release to wastewater was calculated according to the following equation:

$$\mathsf{Elocal}_{\mathsf{water}} = \mathsf{Q}_{\mathsf{a.i.appl}} \bullet \mathsf{AREA}_{\mathsf{surface}} \bullet \mathsf{Nappl} \bullet (1 - \mathsf{F}_{\mathsf{dis}}) \bullet (1 - \mathsf{F}_{\mathsf{elim}}) \bullet \mathsf{F}_{\mathsf{water}} / 1000$$

By default, one application per day is considered as a reasonable worst-case value.

<u>Input parameters for the emission scenario - Disinfection in large scale catering kitchens,</u> canteens, slaughterhouses and butcheries:

	Nomenclatu	ire	Value		Unit	
Input		Active chlorine	Chlorate	SoC		Remarks
Application rate of biocidal product	Vform	0.1	0.1	0.1	l/m²	
Concentration of in-use product	Cform	15.42	1.38	0.16	5 g/l	See table 1
Application rate of the active substance	$Q_{a.i.appl}$	1.54E+00	1.38E-01	1.58l 02	g/m²	See above
Surface area to be disinfected for slaughterhouses	AREA <sub>surface</sub>		10 000		m <sup>2</sup>	Default
Surface area to be disinfected for kitchens & canteens	AREA <sub>surface</sub>		2 000		m <sup>2</sup>	Default

Number of applications per day	Nappl	1	d <sup>-1</sup>	
Fraction of substance disintegrated during or after application, before release to the sewer system	$F_{dis}$	0	-	Default
Fraction of the substance eliminated due to on-site pretreatment of the plant waste water	$F_{elim}$	0	1	Default
Fraction released to wastewater	F <sub>water</sub>	1	-	Default

Output:

Output:						
Calculations:						
$Elocal_{water} = Qa.i{appl}*AREA_{surface}*N_{appl}*(1-F_{dis})*(1-F_{elim})*F_{water}/1000$						
			Catering kitchens			
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	3.08E+00	As Active chlorine eq Cl2		
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	2.76E-01	As Chlorate		
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	3.15E-02	As SoC		
			Slaughterhouse			
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.54E+01	As Active chlorine eq Cl2		
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.38E+00	As Chlorate		
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	1.58E-01	As SoC		

Calculation after degradation of active chlorine in sewer before the STP:

Calculation:	
$M_{t1} = M_{t0}^* EXP^{(-k * t1)}$	<u>Catering kitchens:</u> Elocal <sub>water</sub> = 1.37E-19 kg av Cl/d
$M_{t1}$ = total amount of substance present at time 1 [kg/d] $M_{t0}$ = total amount of substance at time 0 [kg/d] k = rate constant (k = 44.56 h <sup>-1</sup> , calculated from the DT <sub>50</sub> at 12°C: ln2/DT <sub>50</sub> )	Slaughterhouse: Elocal <sub>water</sub> = 6.86E-19 kg av Cl/d

t 1 = time [h] (= 1 h)	

Considering the very low emission rate to the STP because of the degradation of hypochlorite in the sewer systems, further calculations are not necessary and a qualitative assessment is proposed as stated at WGI2020.

• PT4 - Scenario 2: Assessment of private use of disinfectants used in food and feed areas (Meta-SPC 1, 2, 3, 5, 8)

This scenario covers the use "Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth." and "Disinfection of surfaces by spraying: hard surface (ustensils, equipment, furniture)" for private use by non-professionnals only.

The local emission is based on the application rate of disinfectant per  $m^2$  and the area of the treated surface. The main fraction of residues is released to the sewer system. The scenario is based on TAB v2.1, ENV70.

T	Nomenclat ure	Value			Unit	Remarks
Input		Active chlorine	Chlorate	SoC		Remarks
Application rate of biocidal product	Vform	0.1	0.1	0.1	l/m²	
Concentration of in-use product	Cform	15.42	1.38	0.16	g/l	See Table 1
Application rate of the active substance	Q <sub>a.i.appl</sub>	1.54E+00	1.38E-01	1.58E-02	g/m²	See above
Number of households feeding one STP	Nhouses	4000				
Fraction of households using product	F <sub>house</sub>	0.1		-		
Disinfected surface area of a private kitchen	AREA <sub>surface</sub>	2		m <sup>2</sup>	Default	
Number of applications per day	Nappl	1		d <sup>-1</sup>		
Fraction released to wastewater	F <sub>water</sub>	1		-	Default	
Fraction released to air	F <sub>air</sub>	0		-	Default	
Penetration factor of disinfectant	F <sub>penetr</sub>		0.5		-	Default

Output:

Calculations:							
Elocalwater = Qa.i.appi*AREAsurface*Nappi*Fpenetr*Fwater*Fhouse*Nhouses/1000							
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	6.16E-01	As Active chlorine eq Cl2			

Emission rate to wastewater (standard STP)	kg/d	Elocalwater	5.52E-02	As Chlorate
Emission rate to wastewater (standard STP)	kg/d	Elocalwater	6.32E-03	As SoC

Calculation after degradation of active chlorine in sewer before the STP:

Calculation:	
$M_{t1} = M_{t0} * EXP^{(-k * t1)}$	
$M_{t1}$ = total amount of substance present at time 1 [kg/d] $M_{t0}$ = total amount of substance at time 0 [kg/d] k = rate constant (k = 44.56 h <sup>-1</sup> , calculated from the DT <sub>50</sub> at 12°C: ln2/DT <sub>50</sub> ) t 1 = time [h] (= 1 h)	Elocal <sub>water</sub> = 2.74E-20 kg av Cl/d

Considering the very low emission rate to the STP because of the degradation of hypochlorite in the sewer systems, further calculations are not necessary and a qualitative assessment is proposed as stated at WGI2020.

# Fate and distribution in exposed environmental compartments

Identification of relevant receiving compartments based on the exposure pathway  - Av Cl							
Representative scenario	STP	Freshwater incl. sediment	Marine	Soil incl. groundwater	Air		
PT2							
Scenario 1: Disinfection in institutional areas	Q	Q	Q	Q	Q		
Scenario 2: Disinfection in industrial premises	Q	Q	Q	Q	Q		
PT4							
Scenario 1: Disinfection of hard surfaces, in contact with food - large scale catering kitchens, canteens, slaughterhouse	Q	Q	Q	Q	Q		
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	Q	Q	Q	Q	Q		

Q: Qualitative assessment considering negligible emissions

Identification of relevant receiving compartments based on the exposure pathway – Chlorate							
Representative scenario	STP	Freshwater incl. sediment	Marine	Soil incl. groundwater	Air		
PT2							
Scenario 1: Disinfection in institutional areas	а	SQ	а	а	а		
Scenario 2: Disinfection in industrial premises	a	SQ	а	а	а		
PT4							
Scenario 1: Disinfection of hard surfaces, in contact with food - large scale catering kitchens, canteens, slaughterhouse	а	SQ	a	а	a		
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	a	SQ	а	а	a		

 $<sup>\</sup>ensuremath{\mathsf{SQ}}\xspace$  Semi Qualitative assessment; a: covered by the active substance assessment

Identification of relevant receiving compartments based on the exposure pathway – SoC							
Representative scenario	STP	Freshwater incl. sediment	Marine	Soil incl. groundwater	Air		
PT2							
Scenario 1: Disinfection in institutional areas	++	+	n.r.	+	n.r.		
Scenario 2: Disinfection in industrial premises	++	+	n.r.	+	n.r.		
PT4							
Scenario 1: Disinfection of hard surfaces, in contact with food - large scale catering kitchens, canteens, slaughterhouse	++	+	n.r.	+	n.r.		
Scenario 2:	++	+	n.r.	+	n.r.		

Identification of relevant receiving compartments based on the exposure pathway – SoC						
Representative scenario	STP	Freshwater incl. sediment	Marine	Soil incl. groundwater	Air	
Assessment of private use of disinfectants used in food and feed areas						

n.r.: not relevant

Input parameters for calculating the fate and distribution of chlorate in the environment are summarised below using different tools and sources:

Input parameters (only set values) for calculating the fate and distribution in the environment – chlorate					
Input	Value	Unit	Remarks		
Molecular weight	83.5	g/mol	-		
Vapour pressure (at 25°C)	3.50E-07	Pa	-		
Water solubility (at 25°C)	7.36E+05	mg/L	at pH 4.49 to 8.70		
Organic carbon/water partition coefficient (Koc)	31.62	L/kg	QSAR (KOCWIN v2.00)		
Henry's Law Constant (at 20 °C)	5.2E-09	Pa/m3/mol	Estimated		
Biodegradability	Not applicable to inorganic substances	[-]	Not readily biodegradable		
DT50 for degradation in soil	1E+06	d (at 12°C)	Not Readily biodegradable		
Rate constant for soil biodegradation	6.93E-07	d-1 (at 12°C)			

The inputs for Dodecanenitrile (CAS  $n^{\circ}$  2437-25-4) come from the REACH registration dossier of the substance:

https://echa.europa.eu/fr/registration-dossier/-/registered-dossier/20698

Input parameters (only set values) for calculating the fate and distribution in the environment – SoC					
Input	Value	Unit	Remarks		
Molecular weight	181.32	g/mol	-		
Vapour pressure (at 20°C)	3.39	Pa	-		
Water solubility (at 20°C)	2.34	mg/L	-		
Organic carbon/water partition coefficient (Koc)	1887	L/kg	-		
Log Kow	4.77	-	-		

Biodegradability	Readily biodegradabl e	[-]	Meeting the 10-day window
DT50 for degradation in soil	30	d (at 12ºC)	Default value
k total for agricultural soil (depth 0.2 m)	2.98E-02	d-1	kbio + kvolat + kleach

The distribution of chlorate and SoC within STP has been estimated using the SimpleTreat 4.0 Model:

# **Chlorate**

Compartment	Percentage [%]	Remarks
Air	1E-08	-
Water	99.6	-
Sludge	0.394	-
Degraded in STP	0	-

## **Dodecanenitrile**

Compartment	Percentage [%]	Remarks
Air	20.45	-
Water	4.69	-
Sludge	13.84	-
Degraded in STP	61.02	-

## Calculated PEC values

Summary table on calculated PEC values – Active chlorine						
	PEC <sub>STP</sub>	PECwater	PEC <sub>soil</sub>	PEC <sub>GW</sub>	PECair	
	[mg/l]	[mg/l]	[mg/kg <sub>wwt</sub> ]	[µg/l]	[mg/m³]	
PT2						
Scenario 1: Disinfection in institutional areas	Q	Q	Q	Q	Q	
Scenario 2: Disinfection in industrial premises	Q	Q	Q	Q	Q	
PT4						
Scenario 1: Disinfection of hard surfaces, in contact with	Q	Q	Q	Q	Q	

food – large scale catering kitchens, canteens, slaughterhouse					
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	Q	Q	Q	Q	Q

Q: Qualitative assessment considering negligible emissions

Summary table on calculated PEC values – Chlorate					
	PEC <sub>STP</sub>	PEC <sub>wate</sub>	PEC <sub>soil</sub>	PEC <sub>G</sub>	PECair
	[mg/l]	[mg/l]	[mg/kg <sub>wwt</sub> ]	[µg/l]	[mg/m <sup>3</sup>
PT2					
Scenario 1: Disinfection in institutional areas	а	2.40E- 03	a	5.23	n.r.
Scenario 2: Disinfection in industrial premises	а	6.87E- 03	a	14.9	n.r.
PT4					
Scenario 1: Disinfection of hard surfaces, in contact with food – large scale catering kitchens, canteens	a	1.37E- 02	a	29.9	n.r.
Scenario 1: Disinfection of hard surfaces, in contact with food – slaughterhouse	a	6.87E- 02	a	149	n.r.
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	a	2.75E- 03	a	5.99	n.r.

a: covered by the active substance assessment

n.r.: not relevant

Summary table on calculated PEC values – SoC							
	PEC <sub>STP</sub>	PECwater	PEC <sub>soil*</sub>	PEC <sub>GW**</sub>	PECair		
	[mg/l]	[mg/l]	[mg/kg <sub>wwt</sub> ]	[µg/l]	[mg/m³]		
PT2							
Scenario 1: Disinfection in institutional areas	1.29E- 04	1.29E-05	9.40E-04	7.89E-03	n.r.		
Scenario 2: Disinfection in industrial premises	3.70E- 04	3.69E-05	2.68E-03	2.25E-02	n.r.		
PT4							

Scenario 1: Disinfection of hard surfaces, in contact with food – large scale catering kitchens, canteens	7.39E- 04	7.37E-05	5.37E-03	4.51E-02	n.r.
Scenario 1: Disinfection of hard surfaces, in contact with food – slaughterhouse	3.70E- 03	3.69E-04	2.68E-02	2.25E-01	n.r.
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	1.48E- 04	1.48E-05	1.08E-03	9.03E-03	n.r.

<sup>\*</sup>twa over 30 days

## Primary and secondary poisoning

#### Primary poisoning

Primary poisoning is not likely to occur as the products of the family are intended for an indoor use. No direct exposure of birds or mammals is therefore expected.

### Secondary poisoning

No secondary poisoning is expected for active chlorine as it does not bioaccumulate nor bioconcentrate due to its high water solubility and rapid degradation in the environment.

No secondary poisoning is expected for chlorate as it does not bioaccumulate, as can be seen from its low Log(Kow) < 3.

No secondary poisoning is assessed for SoC as no data is available.

### **2.2.8.3** Risk characterisation

A qualitative risk characterization of chlorate is presented for all the environmental compartments as covered by the active substance, except for groundwater as chlorate is a substance of concern in relation to human health. Therefore, a semi-qualitative risk assessment is proposed for groundwater and surface water intented for the abstraction of drinking water, with a comparsion with the WHO value of  $700 \, \mu g/L$ .

A quantitative assessment is presented for the substance of concern for all the environmental compartments

The PECs calculated for the air compartment are considered negligible.

### Active chlorine

Risk characterisation of the active substance is summarized in the following table for each environmental compartment. Results are presented for the three emission scenarios, with degradation of the active substance in the sewer system as it represents the most realistic case in view of the active substance properties.

<sup>\*\*</sup> Based on PECsoil twa over 180 days

Summary table on calculated PEC/PNEC values – Active chlorine						
	PEC/PNEC <sub>STP</sub>	PEC/PNEC water	PEC/PNEC	PEC/Lim it <sub>GW</sub>	PECair	
PT2						
Scenario 1: Disinfection in institutional areas –	negligible	negligible	negligible	negligible	negligib le	
Scenario 2: Disinfection in industrial premises	negligible	negligible	negligible	negligible	negligib le	
PT4						
Scenario 1: Disinfection of hard surfaces, in contact with food – large scale catering kitchens, canteens, slaughterhouse	negligible	negligible	negligible	negligible	negligib le	
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	negligible	negligible	negligible	negligible	negligib le	

Summary table on calculated PEC/PNEC values – Chlorate							
	PEC/PNEC <sub>STP</sub>	PEC <sub>surface</sub> water intented for the abstraction of drinking water /Limit <sub>GW*</sub>	PEC/PNEC soil	PEC <sub>GW/</sub> / Limit <sub>GW*</sub>	PECair		
PT2							
Scenario 1: Disinfection in institutional areas –	a	3.43E-03	a	7.47E-03	n.r.		
Scenario 2: Disinfection in industrial premises	a	9.81E-03	а	2.14E-02	n.r.		
PT4							
Scenario 1: Disinfection of hard surfaces, in contact with food – large scale catering kitchens, canteens	a	1.96E-02	a	4.27E-02	n.r.		
Scenario 1: Disinfection of hard surfaces, in contact with food – slaughterhouse	a	9.81E-02	a	2.14E-01	n.r.		
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	a	3.93E-03	a	8.55E-03	n.r.		

a: covered by the active substance assessment

\* compared to the drinking water limit value of 700  $\mu$ g chlorate/L (WHO drinking water limit) for water disinfected by chloration.

n.r.: not relevant

Summary table on calculated PEC/PNEC values – SoC							
	PEC/PNEC <sub>STP</sub>	PEC/PNEC water covering sediment as EPM	PEC/PNEC soil twa	PEC <sub>GW</sub>	PECair		
PT2							
Scenario 1: Disinfection in institutional areas –	9.95E-02	2.19E-01	2.59E-02	7.89E-03	n.r.		
Scenario 2: Disinfection in industrial premises	2.84E-01	6.25E-01	7.41E-02	2.25E-02	n.r.		
PT4							
Scenario 1: Disinfection of hard surfaces, in contact with food – large scale catering kitchens, canteens	5.69E-01	1.25E+00	1.48E-01	4.51E-02	n.r.		
Scenario 1: Disinfection of hard surfaces, in contact with food – slaughterhouse	2.84E+00	6.25E+00	7.41E-01	2.25E-01	n.r.		
Scenario 2: Assessment of private use of disinfectants used in food and feed areas	1.14E-01	2.50E-01	2.97E-02	9.03E-03	n.r.		

### **Conclusions:**

In PT02, the risks are acceptable for all the scenarios.

In PT04, unacceptable risks in surface water and STP are foreseen for disinfection of hard surfaces in contact with food for the SoC in the scenario 1 (large scale catering kitchen and canteens, slaughterhouse). Risks are acceptable for the disinfection in private areas by non-professionals.

This restriction will be indicated in the SPC for the PT04 uses of META-SPC 8 (for which the SoC is relevant): 'The disinfection of hard surfaces in contact with food is restricted to domestic areas'.

## Primary and secondary poisoning

Primary poisoning is not likely to occur as the products are intended for an indoor use. No direct exposure of birds or mammals is therefore expected.

### Secondary poisoning

No secondary poisoning is expected for active chlorine as it does not bioaccumulate nor bioconcentrate due to its high water solubility and rapid degradation in the environment.

No secondary poisoning is expected for chlorate as it does not bioaccumulate, as can be seen from its low Log(Kow) < 3.

No secondary poisoning is assessed for SoC as no data is available.

### Mixture toxicity

A quantitative assessment has been performed only on the SoC and thus a mixture toxicity assessment is not relevant in the case of this dossier.

## Aggregated exposure (combined for relevant emmission sources)

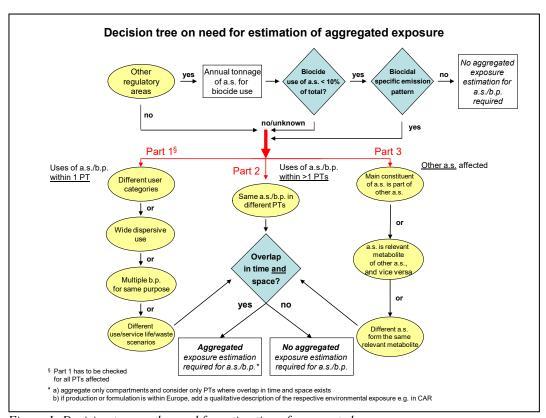


Figure 1: Decision tree on the need for estimation of aggregated exposure

The aggregate risks assessment presented below sums up the SoC risk ratios from all uses and the chlorates assessment for groundwater and surface water intended for drinking water, in case of release to STP. The scenarios taken into account in the calculations are PT2: Scenario 1+2 and PT4: Scenario 2, as PT4: Scenario1 presents unacceptable risks for the environnement.

Summary table on calculated **SPEC/PNEC** values - Chlorates

ΣPEC/PNEC <sub>STP</sub>	ΣPEC/PNEC <sub>water</sub> intented for the abstraction of drinking water*	ΣPEC/PNEC <sub>soil</sub>	ΣPEC <sub>GW/PN</sub> EC GW*
negligible	1.72E-02	negligible	3.74E-02

Summary table on calculated ΣPEC/PNEC values - SoC					
ΣPEC/PNEC <sub>STP</sub>	ΣPEC/PNEC <sub>soil</sub>	$\Sigma PEC_{GW}$			
4.98E-01	1.09	1.30E-01	3.95E-02		

Conclusion: Aggregated risks for chlorate are acceptable for all compartments. Risks are foreseen for SoC. Nevertheless, an aggregated risks considering all the scenarios seems to be too worst case.

### Overall conclusion on the risk assessment for the environment of the product

Risks are acceptable for all the environmental compartments considering a qualitative assessment of the active substance NaOCI leading to negligible emissions to the environment, considering a semi-qualitative assessment of chlorate for groundwater and surface water intended for the abstraction of drinking water, for the following uses:

- PT 2/4: Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket.
- PT 2/4: Disinfection of surfaces by spraying : hard surface (ustensils, equipment, furniture)

Risks are acceptable for all the environmental compartments considering a quantitative assessment of the substance of concern: Dodecanenitrile (CAS n° 2437-25-4) only in meta-SPC 8, for the following uses:

- PT 2: Disinfection of surfaces (floors, utensils, equipment, furniture) by wiping with mop/cloth and bucket.
- PT 2: Disinfection of surfaces by spraying : hard surface (ustensils, equipment, furniture)

In PT04, unacceptable risks in surface water and STP are foreseen for disinfection of hard surfaces in contact with food in the scenario 1 (professional applications on large scale catering kitchen and canteens, slaughterhouse). Risks are acceptable for the disinfection in private areas.

This restriction will be indicated in the SPC for the PT04 uses of META-SPC 8 (for which the SoC is relevant): 'The disinfection of hard surfaces in contact with food is restricted to domestic areas'.

## > NA-MIC minor change application (2022)

The minor change regarding the extension of the self-life for Meta SPCs 1, 3 and 8 induces an increase of the chlorate concentrations. However, according to the WG-I-2020, it has

been decided that chlorate can be assessed qualitatively for all the environmental compartments. Therefore this minor change has no impact on the environmental risk assessment. Moreover, the highest in-use concentration of chlorate used in the risk assessment remains unchanged as it comes from meta SPC 2. Concerning the other minor changes (modification of the soiling conditions during use for all Meta SPCs; addition of trade names; addition of manufacturing sites of the active substance), they have no impact on classification of the biocidal product, nor on the analysis of the substance of concern nor on the environmental risk assessment as they do not changes the intended dose rates.

## 2.2.9 Measures to protect man, animals and the environment

# 2.2.10 Assessment of a combination of biocidal products

For biocidal products that are intended to be authorised for the use with other biocidal products.

## 2.2.11 Comparative assessment

Active chlorine released from sodium hypochlorite is not candidate for substitution in accordance with Article 10 of BPR.

# 3 ANNEXES<sup>13</sup>

# 3.1 List of studies for the biocidal product family

Author(s)	Year	Title. Source (where different from company) Company, Report No. GLP (where relevant) / (Un)Published	Data Protection Claimed (Yes/No)	Owner (PUB / ORG)
		Evaluation de l'activité bactéricide en solution selon la norme EN 1276:2019-08, BioPreserv, Report No 19BP280 - EN 1276, revision on 30/04/2020	Yes	Notilia
		Evaluation de l'activité fongicide en solution selon la norme EN 1650 -2019, BioPreserv, Report No 19BP280 - EN 1650, revision on 30/04/2020	Yes	Notilia
		Evaluation de l'activité bactéricide et fongicide de surface non- poreuse selon la norme EN 13697+A1:2019-07, BioPreserv, Report No 19BP280 - EN 13697, revision on 04/05/2020	Yes	Notilia
		EN 13697, Bactericidal and fungicidal activity - Actalia (2020) Report No SMI.2020.338.2	Yes	Notilia
		NF EN 13697 + A1 : 2019 ACTIVITE BACTERICIDE PRODUIT TESTE : SOLUTION HYPOCHLORITE SODIUM 1,3% Laboratoire Mediterranéen de Microbiologie Report No LMM 2021001L	Yes	Notilia
		NF EN 13697 + A1 : 2019 ACTIVITE FONGICIDE PRODUIT TESTE : SOLUTION HYPOCHLORITE SODIUM 1,3% Laboratoire Mediterranéen de Microbiologie Report No LMM 2021002L	Yes	Notilia
		Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 2.6% (Meta SPC1) Part 1: Physical-chemical properties upon receipt and after cold storage PHYTOSAFE s.a.r.l. 20-30-009-ES Part 1	Yes	Notilia

<sup>13</sup> When an annex in not relevant, please do not delete the title, but indicate the reason why the annex should not be included.

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<u> </u>	GLP; Unpublished		
	GLP; Onpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 2.6% (Meta SPC1)		
	Part 2: Shelf-life determination	Yes	Notilia
	PHYTOSAFE s.a.r.l.		
	20-30-009-ES Interim		
	GLP; Unpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 9.6% (Meta SPC2 and Meta SPC7) Part 1: Physical-		
	chemical properties upon receipt	Yes	Notilia
	and after cold storage	103	Notina
	PHYTOSAFE s.a.r.l.		
	20-30-016-ES Part 1		
	GLP; Unpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 9.6% (Meta SPC2		
	and Meta SPC7) Part 2: Shelf-life	Yes	Notilia
	determination PHYTOSAFE s.a.r.l.		
	20-30-016-ES Part 2		
	GLP; Unpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 12.5% Part 1:		
	Physical-chemical properties upon	Yes	Notilia
	receipt	103	Notina
	PHYTOSAFE s.a.r.l.		
	20-30-047-ES Part 1		
	GLP; Unpublished Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 12.5% Part 2: Shelf-		
	life determination	Yes	Notilia
	PHYTOSAFE s.a.r.l.		
	20-30-047-ES Interim		
	GLP; Unpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 13-16% Part 1: Physical-chemical properties upon		
	receipt	Yes	Notilia
	PHYTOSAFE s.a.r.l.		
	20-30-042-ES Part 1		
	GLP; Unpublished		
	Physical-chemical properties,		
	stability and shelf-life of Sodium		
	hypochlorite 13-16% Part 2:	Vos	Natilia
	Shelf life determination PHYTOSAFE s.a.r.l.	Yes	Notilia
	20-30-042-ES Interim		
	GLP; Unpublished		
1	CEL / OTIPODIISTICO		

-	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 1.5% (Meta SPC3) Part 1: Physical-chemical properties upon receipt and after cold storage PHYTOSAFE s.a.r.l. 20-30-017-ES Part 1 GLP; Unpublished	Yes	Notilia
	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 1.5% (Meta SPC3) Part 2: Shelf-life determination PHYTOSAFE s.a.r.l. 20-30-017-ES Interim GLP; Unpublished	Yes	Notilia
-	Spray droplet size distribution by laser diffraction before and after a storage procedure for 24 months at 20 °C ± 2 °C on SPRAY JAVEL 1.5% Results at T=0 DEFITRACES Intermediary report 20-914015-001 GLP; Unpublished	Yes	Notilia
-	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 4.9% + 5% neutral detergent (Meta SPC5) Part 1: Physical-chemical properties upon receipt and after cold storage PHYTOSAFE s.a.r.l. 20-30-019-ES Part 1 GLP; Unpublished	Yes	Notilia
_	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 4.9% + 5% neutral detergent (Meta SPC5) PHYTOSAFE s.a.r.l. Amendment to the final report 20-30-019-ES Part 1 GLP; Unpublished	Yes	Notilia
	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 4.9% + 5% neutral detergent (Meta SPC5) Part 2: Shelf-life determination PHYTOSAFE s.a.r.l. 20-30-019-ES Part 2 GLP; Unpublished	Yes	Notilia
-	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 2.6% + 5% perfumed detergent (Meta SPC8) Part 1: Physical-chemical properties upon receipt and after cold storage PHYTOSAFE s.a.r.l. 20-30-021-ES Part 1	Yes	Notilia

	GLP; Unpublished		
	Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 2.6% + 5% perfumed detergent (Meta SPC8) Part 2: Shelf-life determination PHYTOSAFE s.a.r.l. 20-30-021-ES Interim GLP; Unpublished	Yes	Notilia
	Test methods for corrosion to metals on SPRAY JAVEL 1.5% DEFITRACES 20-914015-002 GLP; Unpublished	Yes	Notilia
	Flash point and Auto-ignition temperature of liquids tests on JAVEL 4.9% + DÉTERGENT EUCALYPTUS DEFITRACES 20-914015-003 GLP; Unpublished	Yes	Notilia

# > NA-MIC minor change application (2022)

Author(s)	Year	Title. Source (where different from company) Company, Report No. GLP (where relevant) / (Un)Published	Data Protection Claimed (Yes/No)	Owner (PUB / ORG)
		Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 2.6% (Meta SPC1) Part 2: Shelf-life determination Phytosafe s.a.r.l. Report No. 20-30-009-ES-FR2 GLP; Unpublished	Yes	Notilia
		Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 1.5% (Meta SPC3) Part 2: Shelf-life determination Phytosafe s.a.r.l. Report No. 20-30-017-ES-FR2 GLP; Unpublished	Yes	Notilia
		Physical-chemical properties, stability and shelf-life of Sodium hypochlorite 2.6% + 5% perfumed detergent (Meta SPC8) Part 2: Shelf-life determination Phytosafe s.a.r.l. Report No. 20-30-021-ES-FR2 GLP; Unpublished	Yes	Notilia

NF EN 1276 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium 1,3% Laboratoire Mediterranéen de Microbiologie Report No LMM 2022004L Non-GLP; Unpublished	Yes	Notilia
NF EN 1650 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium à 1,3% Laboratoire Mediterranéen de Microbiologie Report No LMM 2022005L Non-GLP; Unpublished	Yes	Notilia
NF EN 1276 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium 2,6% Laboratoire Mediterranéen de Microbiologie Report No LMM 2023007L Non-GLP; Unpublished	Yes	Notilia
NF EN 1276 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium 2,6% + détergent neutre Laboratoire Mediterranéen de Microbiologie Report No LMM 2023029L Non-GLP; Unpublished	Yes	Notilia
NF EN 1650 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium à 2,6% Laboratoire Mediterranéen de Microbiologie Report No LMM 2023031L Non-GLP; Unpublished	Yes	Notilia
NF EN 1650 : 2019 - ACTIVITE BACTERICIDE PRODUIT TESTE : Solution hypochlorite de sodium à 2,6% + détergent neutre Laboratoire Mediterranéen de Microbiologie Report No LMM 2023032L Non-GLP; Unpublished	Yes	Notilia

# 3.2 Output tables from exposure assessment tools







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### > NA-MIC minor change application (2022)

The minor changes have no impact on the human health risk assessment.

### 3.3 New information on the active substance

### 3.4 Residue behaviour

Please note that the applicant has developed an approach to estimate the risk for consumer via drinking water consumption. This approach have been considered as not relevant by eCA. This assessment is presented in Annex Residue §3.4 as informative data.

### Maximum residue limits or equivalent

Residue definitions

'Residue' means a substance present in or on products of plant or animal origin, water resources, drinking water, food, feed or elsewhere in the environment and resulting from the use of a biocidal product, including such a substance's metabolites, breakdown or reaction products;

In this case, chlorates are a residue of sodium hypochlorite solutions.

Substance	<b>Exposure route</b>	Reference value
Chlorate	Oral	ARfD = 36 µg chlorate/kg bw
	Oral	ADI = 3 µg chlorate/kg bw

### Risk for consumers via residues in food

Currently, no agreed and published guidance is available for the estimation of dietary risk from transfer of biocidal active substances into food in professional settings. Thus, no dietary risk assessment can be provided at this stage for the professional uses of PT4.

#### Reference values to be used in Risk Characterisation

Exposure route	Reference value
Oral	NOAEC <sub>oral</sub> = 0.1% available chlorine
Dermal	NOAEC <sub>dermal</sub> = 1% available chlorine
Inhalation	AEC <sub>inhal</sub> = 0.5 mg/m <sup>3</sup> available chlorine

### Maximum residue limits or equivalent

## Residue definitions

'Residue' means a substance present in or on products of plant or animal origin, water resources, drinking water, food, feed or elsewhere in the environment and resulting from

the use of a biocidal product, including such a substance's metabolites, breakdown or reaction products;

In this case, chlorates are a residue of sodium hypochlorite solutions.

Substance	Exposure route	Reference value
Chlorate	Oral	ARfD = 36 μg chlorate/kg bw
	Oral	ADI = 3 μg chlorate/kg bw

### Risk for consumers via residues in food

### **Scenarios**

As a reminder, chlorates can be found during:

- Disinfection of surfaces (other than floors) by wiping with mop/cloth and bucket whom food and feed areas Professional
- Disinfection of surfaces (other than floors) by spraying whom food and feed areas –
   Professional
- Disinfection of surfaces (other than floors) by wiping with mop/cloth and bucket whom food and feed areas Non-professional
- Disinfection of surfaces (other than floors) by spraying whom food and feed areas –
   Non-professional

For secondary exposure from professional settings, reference to the EFSA Scientific Opinion of the EFSA CONTAM Panel on "Risks for public health related to the presence of chlorate in food" (EFSA Journal 2015; 13:4135) is preferred over modelling, which includes a comprehensive dietary exposure and risk assessment for chlorate residues in food and drinking water based on occurrence data.

In brief, the EFSA Panel on Contaminants in the Food Chain (CONTAM Panel) evaluated the exposure and risk arising from chlorate residues found in food and drinking water. Occurrence data from European national food authorities and similar bodies was collected and approximately 8000 samples were analysed for chlorate contents (e.g. grains and grain-based products, vegetables and vegetable products, legumes, fruit and fruit products, herbs and spices, milk and dairy products, (non-)alcoholic beverages, composition food, and drinking water). Chlorate content in all food commodities assessed ranged from 3  $\mu$ g/kg (alcoholic beverages) to 417  $\mu$ g/kg (herbs and spices) (mean upper bound values). The mean chlorate value for drinking water was 39  $\mu$ g/L (mean upper bound).

An acute and chronic exposure assessment was performed for different population groups, using consumption data from the EFSA Comprehensive Database and the measured chlorate

levels. According to the Scientific Opinion, "mean and 95<sup>th</sup> percentile acute exposures were below the ARfD [36 µg chlorate/kg bw] for all age groups indicating no concern". Moreover it is stated that, "chronic exposure of adolescent and adult age classes did not exceed the TDI [3 µg chlorate/kg bw]. However, at the 95<sup>th</sup> percentile, the TDI was exceeded in all surveys for 'Infants' and 'Toddlers', and in some surveys in 'Other children'", indicating that "chronic exposures are of concern in particular in younger age groups with mild or moderate iodine deficiency."

Chlorate is no longer used as pesticide (according to Commission Decision No 2008/865/EC). Thus, chlorate contamination in food is likely to be mainly derived from biocidal uses of chlorine and hypochlorite. Both substances are widely used for disinfection of surfaces and equipment in food and feed processing areas as well as for disinfection of drinking water (i.e. as biocidal products in PTs 4 and 5), and thus, chlorate residues can be carried-over into food and feed during cleaning, washing and processing steps. Accordingly, "CONTAM Panel assumes that chlorate residues in food result mainly from the use of chlorinated water for food processing (e.g. washing) and from the disinfection of surfaces and food processing equipment coming into contact with food."

Potential chlorate residues from the application of chlorine and hypochlorite in PTs 4 are considered to be included in the measured chlorate residue values, and the conclusions drawn by the EFSA CONTAM Panel on chlorate residues cover thus also the dietary risk arising from PT4 uses of chlorine and hypochlorite. Since the EFSA Scientific Opinion on chlorate residues provides actual measured data for chlorate residues in food and an exhaustive exposure and risk assessment based on consumption data, the conclusions drawn in the EFSA Scientific Opinion are superior to any dietary risk assessment based on exposure models.

Therefore it could be assumed that the dietary intake of chlorate resulting from professional uses of NaOCl does not trigger toxicological concern.

#### For non-professional uses:

Dietary risk assessment for chlorate for intended uses in PT4 has been performed according to the Guidance.

Chlorates exposure was calculated using the "BfR Calculator for Estimating transfer of biocide residues into foods (non-professional uses)".

The risk assessment has been performed according to the EMA "Guideline on risk characterization and assessment of maximum residue limits (MRL) for biocides" (2015).

No measured data on chlorate residues after application of the products are available. It is noticed that chlorate residue formation may depend on the formulation of the products as well as on the storage conditions of the product. In the absence of measured residue data, the chlorate content according to sodium hypochlorite specification was used for estimation of chlorate contents in the application solution. According to EN 900:2014, chlorate may be present as a by-product of the production process.

Available active chlorine content in a product is at most 16%. Whereas, the maximum level of Na chlorate (impurity) is specified at 5% w/w (absolute).

The maximum level of Na chlorate (5% w/w) was converted into "% of available chlorine" (ie %avCl) by the following calculation :

pourcentage of available chlorine = 
$$\frac{5}{16} * 100 = 31.25$$

With an in-use concentration of 49 000 mg/L of sodium hypochlorite (4.9% in-use dilution)<sup>14</sup>, the concentration of sodium chlorate (NaOCl<sub>3</sub>) is 15 312.5 mg/L (1.5%) and the concentration of chlorate is 12 005 mg/L (1.2%), considering:

$$MW(NaClO_3) = 106.44$$
 $MW(ClO_3) = 83.45$ 

$$percentage\ of\ chlorate\ into\ sodium\ chlorate = \frac{MW(ClO_3)}{MW(NaClO_3)}*100 = 78.4\%$$

The product is then rinsed at 10%, the concentration of chlorate falls at 1 200 mg/L.

The relevant reference value for chlorate as agreed during BPC WGIII-2016 is the ADI of 0.003 mg/kg bw and the ARfD of 0.036 mg/kg bw (according to EFSA CONTAM Panel, 2015. Scientific Opinion on risks for public health related to the presence of chlorate in food. EFSA Journal 2015; 13:4135).

2	Scenario: Disinfectants in dishwashing detergents (Non-professional use)				
	Biocidal product		product specific informatio n		
	Active substance	Chlorates	product specific informatio n		
	concentration of active substance in dishwashing detergent: c <sub>as in bp</sub> (mg/kg)	1200	product specific informatio n		
	maximal application rate of detergent (= concentration of detergent in dish wash solution): R <sub>appl detergent</sub> (g detergent./L)	1,4	default 1,400 g/L or product specific value		

<sup>&</sup>lt;sup>14</sup> Worst case: 9.6% avCl product (use 2 - non professional use)

maximal application rate of active substance (= concentration of active substance in dish wash solution): Rappl as (mg as/L)	1,68	calculated as $R_{appl \ as} = (C_{as \ in \ bp} \div 1000) \ x$ $R_{appl \ detergent}$
ADI (mg/kg bw/d)	0,00	<source (year)&gt;</source 
ARfD (mg/kg bw/d) (if applicable)	0,04	<source (year)&gt;</source 
amount of water left on dishes: $T_a$ (L/cm <sup>2</sup> )	5,50E-07	default value
area of dishes in daily contact with food: $S_a$ (cm <sup>2</sup> )	5400	default value
mass transfer efficiency: TF	1	default 100% or product specific value
optional: RF (additional refinement factor)	1	<pre><specify ,="" applicable="" e.g.="" factor,="" if="" refinement="" rinsing=""></specify></pre>

Calculation of consumer exposure*	adult (60 kg bw)	toddler (10 kg bw)	child (23,9 kg bw)	infan t (8 kg bw)
Estimation of daily consumer exposure via food (mg/kg bw/d)	8,32E-05	4,99E-04	2,09E-04	6,24E -04
Estimation of chronic consumer exposure via food (% ADI)	2,7720	16,6320	6,9590	20,79 00

Estimation of acute consumer exposure via food (% ARfD)	0,2310	1,3860	0,5799	1,732 5
*calculated as $Exp_{cons} = (R_{appl as} \times T_a \times S_a \times TF \times RF) \div bw$				

### **Conclusion**

The estimate intake of chlorates is less than 30% of the ADI (based on appropriately conservative assumptions and margins to cover uncertainties) at all timepoints after application of the product (see the scenarios above), then it could be concluded that an MRL assessment is not necessary for the protection of human health and there would be no need for an evaluation of the substance by the CVMP (EMA, 2015).

# 3.5 Summaries of the efficacy studies (B.5.10.1-xx)<sup>15</sup>

## 3.6 Confidential annex

See the confidential PAR

## 3.7 Other

15 If an IUCLID file is not available, please indicate here the summaries of the efficacy studies.