Re: Registration of Sodium Hypochlorite under the European Biocidal Products Regulation

To whom it may concern,

The Biocidal Products Regulation (BPR) EU 528/2012 which concerns the making available on the market and use of biocidal products was adopted in 2012 and came into effect on 1st September 2013. The BPR replaced the earlier Biocidal Products Directive (BPD) 98/8/EC. More information of the BPR can be found on the website of the European Chemicals Agency (ECHA - http://echa.europa.eu/regulations/biocidal-products-regulation) and on the Euro Chlor website (http://www.eurochlor.org/chlorine-industry-issues/biocides.aspx). Under the BPR, biocidal product authorization takes place in two stages. In the first stage, the active substance must be approved. This is then followed by authorization of the biocidal products that contain the approved active substance(s).

In order to continue to market a biocidal active substance in the European Union, manufacturers and importers of the active substance were required to notify the European Commission of their intent support the use of their active substance for specific products types (PTs).

The members of the Euro Chlor Sodium Hypochlorite Biocides Registration Group have notified sodium hypochlorite (CAS No. 7681-52-9; EC No. 231-668-3) as an active substance under the BPD for the following PTs:

- PT 1: Human hygiene biocidal products
- PT 2: Private area and public health area disinfectants and other biocidal products
- PT 3: Veterinary hygiene biocidal products
- PT 4: Food and feed area disinfectants
- PT 5: Drinking water disinfectants
- PT 11: Preservatives for liquid-cooling and processing systems
- PT 12: Slimicides

A complete registration dossier for PTs 1-5 was submitted in 2007 to the Evaluating Competent Authority, Italy. A complete registration dossier for PTs 11-12 was submitted in 2008. The evaluation of the dossiers commenced under the BPD and continues under the BPR. Manufacturers and importers who market sodium hypochlorite for biocidal purposes should contact the secretariat of the Biocides Registration group to enquire about membership.

The members of the Euro Chlor Sodium Hypochlorite Biocides Registration Group are listed at the end of this letter.
Article 95 of the BPR states that any person wishing to place an active substance on the Union market on its own or in a biocidal product must submit to ECHA a dossier on the active substance or a letter of access to such a dossier. ECHA will publish and maintain a list of persons who have made such a submission and, as from the 1st September 2015, only biocidal products formulated with active substances originating from a supplier on this list may be placed on the market. The list can be consulted here: http://echa.europa.eu/information-on-chemicals/active-substance-suppliers.

Please note that the Euro Chlor Sodium Hypochlorite Biocides Registration Group Secretariat does not intend to issue any Letters of Access to the sodium hypochlorite dossier to biocidal product formulators. Companies formulating or placing sodium hypochlorite-containing biocidal products on the market should approach their active substance supplier directly in order to obtain a Letter of Access for the purpose of application for authorization of a biocidal product. Applications for authorizations of biocidal products cannot be submitted until a decision on the approval of the active substance has been taken. A decision is expected at the earliest in 2016/2017. A letter of access will allow ECHA or a Member State Competent Authority to access the data in the active substance dossier for the purposes of biocidal product authorization, on behalf of a third-party.

For more information, please contact the Euro Chlor Biocides Registration Group secretariat.

Sincerely,
Nina McGrath,
Science Counsellor, Euro Chlor
Tel. +32 (0)2 676 73 61
Fax. +32 (0)2 676 72 44
www.eurochlor.org
Members of the Euro Chlor Sodium Hypochlorite Registration Group

- A.C.R.A.F SpA
- Akzo Nobel Industrial Chemicals BV
- Altair Chimica SpA
- Anwil SA
- Arkema France
- BASF AG
- Bochemie a.s
- Borregaard Industries Ltd
- BorsodChem Nyrt
- Brenntag UK and Ireland Ltd
- CABB AG
- CABB GmbH
- Caffaro Brescia SpA
- CBe Europe Ltd
- CUF Quimicos Industriais SA
- DonauChemie
- Electroquímica de Hernani SA
- Electroquímica del Noroeste SA
- Ercros SA
- Fater JV
- Industrial Chemicals Ltd
- Ineos Chlor Ltd
- Inquide-flix-WATERCHEM
- Kapachim
- Kemira Oy
- Lombarda
- Micro-Bio (Ireland) Ltd
- Olitchim SA
- PCC Rokita SA
- PPC SAS
- Produits Chimiques d’Harbonnières
- Química del Cinca SA
- Solvay SA
- Spolana a.s.
- Syndial SpA
- Tessenderlo Chemie
- Unilever-Knorr SA