



**An Roinn Talmhaíochta,  
Bia agus Mara**  
Department of Agriculture,  
Food and the Marine

# Workshop

Michelle Whelan, PhD,  
12/03/2020

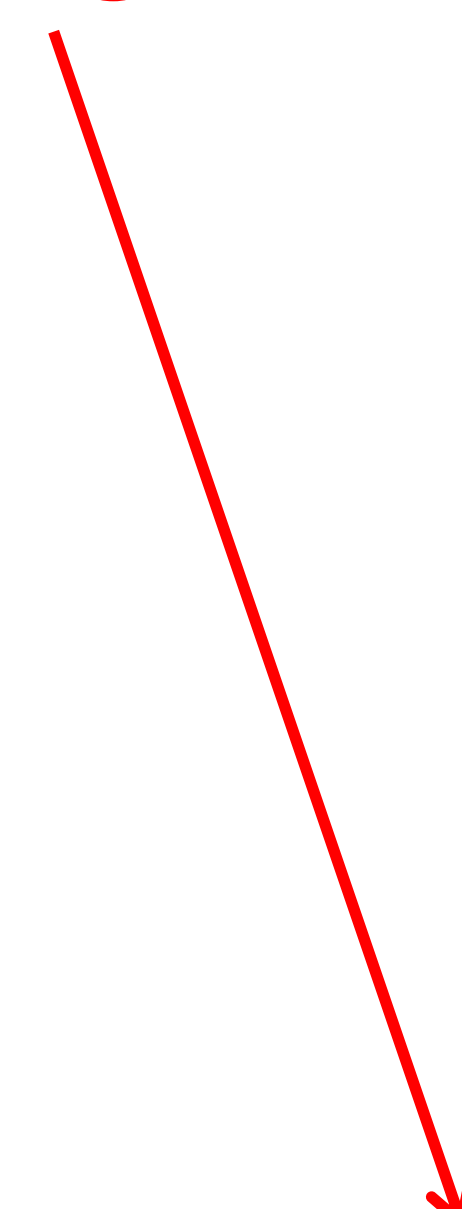
# Example 1

# Example 1

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name - Super Fly Killer
- Active substance(s)
- Permethrin (CAS No 52645-53-1) - 0.552% w/w
- Silicic acid, aluminium magnesium sodium (CAS NO 12040-43-6) - 0.50%w/w
- Product Type – PT 18
- Claims – to kill fly's and midges

# Q1

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_x\_\_\_ **because 1 AS in product is still in progress**
- Authorisation\_\_\_\_\_
- Simplified Authorisation\_\_\_\_\_
- Treated Article, no application required\_\_\_\_\_
- AS not in review programme \_\_\_\_\_

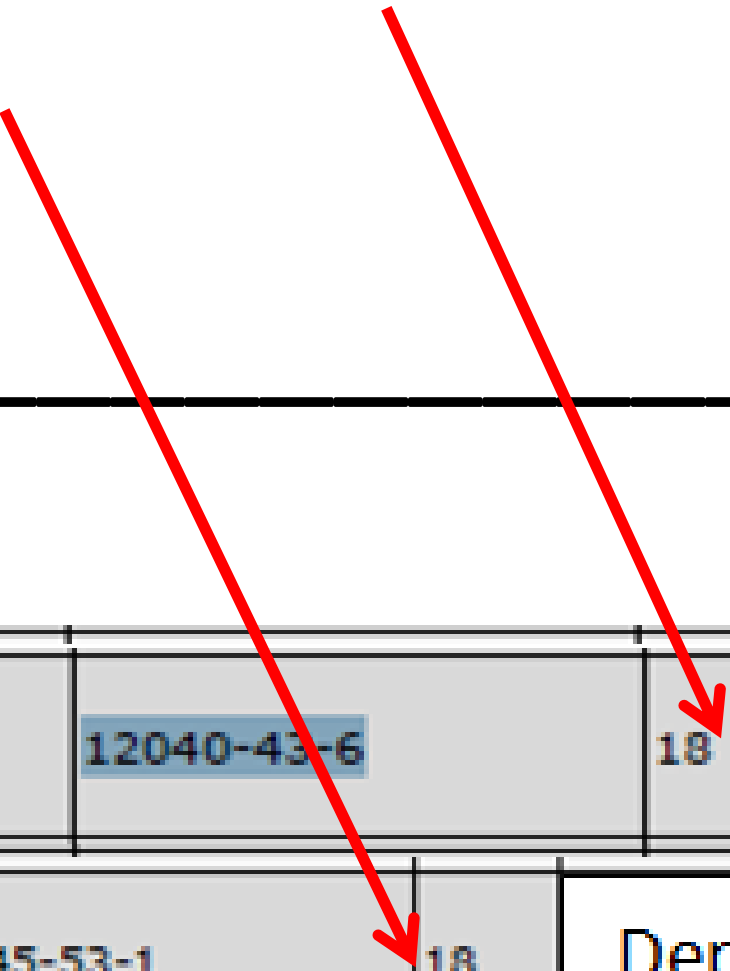


Silicic acid, aluminium magnesium sodium salt	234-919-5	12040-43-6	 PT18			Netherlands	Initial application for approval in progress Competent authority evaluation
---	-----------	------------	--	--	--	-------------	--

## Q2

- Is LoA / LoS adequate?
- Yes  LoA for approved substance and invoice for in progress substance from companies on Art 95 list
- No
- If not, what is the issue \_\_\_\_\_

Silicic acid, aluminium magnesium sodium salt	234-919-5	12040-43-6	18	Dept Of Agriculture
3-phenoxybenzyl (1RS,3RS;1RS,3SR)-3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate (Permethrin)	258-067-9	52645-53-1	18	Dept Of Agriculture



Q3

- Does product label claims match application form?
- Yes \_\_\_x\_\_\_
- No \_\_\_\_\_
- 

Claims – to kill fly's and midges

Super Fly Killer is an aerosol to be used indoors only around windows, containing Permethrin 0.552% and Silicid|Acid 0.5% for application to fly's and midges by amateur users

Q4

Does SDS look compliant?

- Yes   All required sections complete [for purposes of this example]
- No
- If not, what is the issue \_\_\_\_\_





## Q6

Does SDS (section 2.2) match product label?

- Yes \_\_\_ x \_\_\_ **text from section 2.2 on label**
- No \_\_\_\_\_
- If not, what is the issue \_\_\_\_\_

### 2.2 Label elements

Labelling in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, as amended.

#### GHS Pictograms:



#### Signal Word:

WARNING

#### Hazard Statement:

H400: Very toxic to aquatic life

#### Precautionary Statement:

P210: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

P211: Do not spray on an open flame or other ignition source.

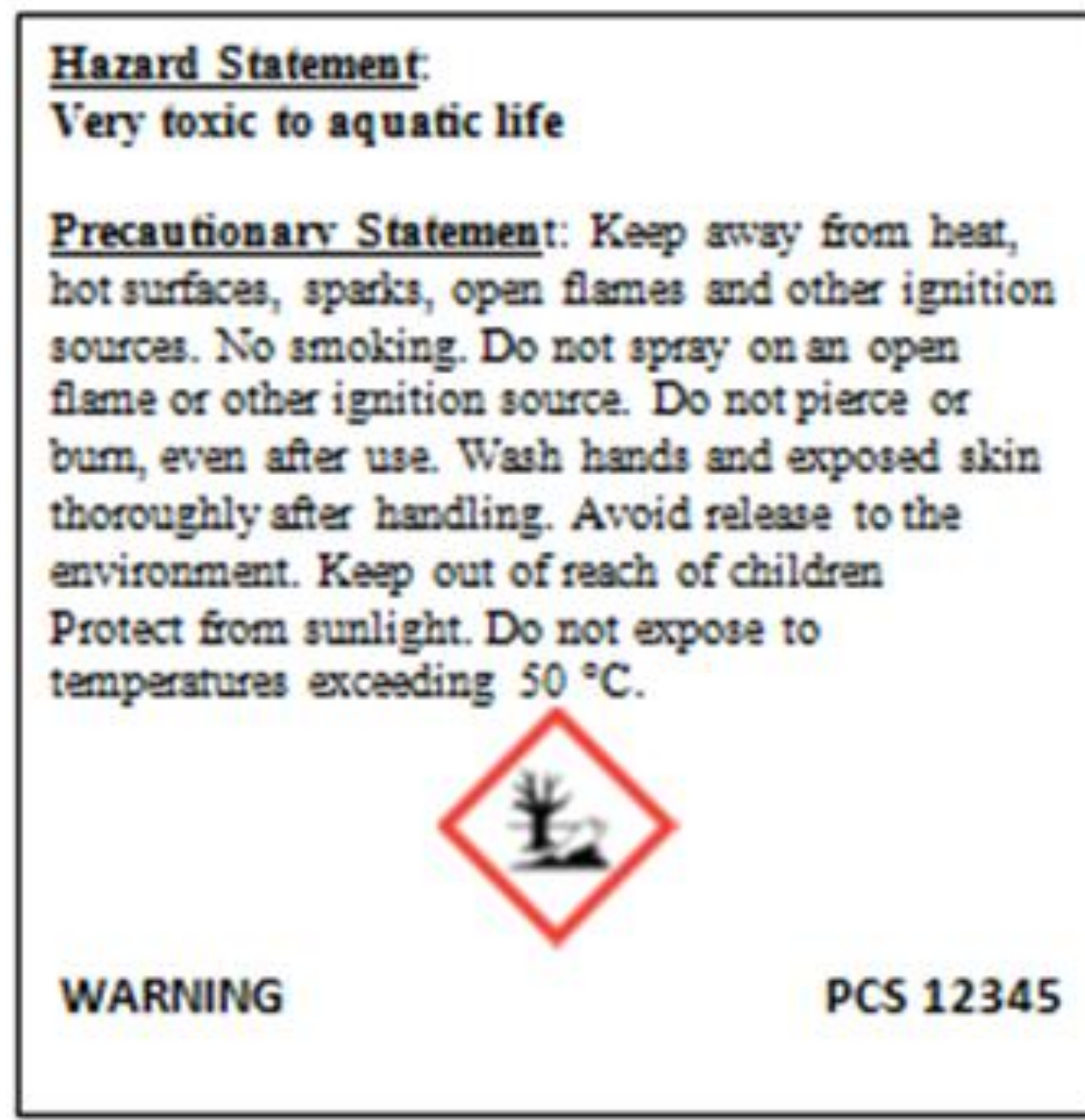
P251: Do not pierce or burn, even after use.

P264: Wash hands and exposed skin thoroughly after handling.

P273: Avoid release to the environment.

P102: Keep out of reach of children

P410 + P412: Protect from sunlight. Do not expose to temperatures exceeding 50 °C.



Q7

Is label compliant? (*e.g. trade name, AS name and content, claims, PCS No same as register?, CLP from section 2 of SDS, instructions for use & disposal, Use biocides safely & Sus... Included etc.*)

- Yes  Art 69 compliant, details the exact same as the register, no rounding of AS concentration.
- No
- If not, what is the issue \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

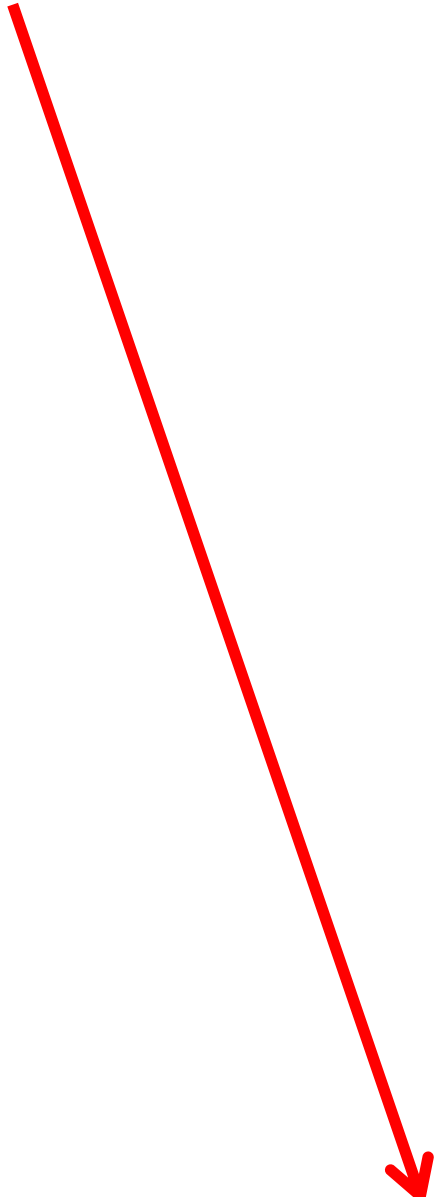
# Example 2



# Example 2

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name – PCD Food & Feed Disinfectant
- Active substance(s)
- Diamine (CAS No2372-82-9) - 0.90% w/w
- Product Type – PT 4
- Claims – to control listeria and e-coli on utensils and surfaces associated with production of food.

# Q1

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_x\_\_\_ **because AS in product is still in progress**
- Authorisation\_\_\_\_\_
- Simplified Authorisation\_\_\_\_\_
- Treated Article, no application required\_\_\_\_\_
- AS not in review programme \_\_\_\_\_



N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine (Diamine)	219-145-8	2372-82-9	 PT04			Portugal	<b>Initial application for approval in progress</b> Competent authority evaluation		
--	-----------	-----------	--	--	--	----------	---	---	--

## Q2

Is LoA / LoS adequate?

• Yes \_\_\_\_\_

• No \_\_\_x\_\_\_

N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine (Diamine)	219-145-8	2372-82-9	4	Lonza Cologne GmbH
N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine (Diamine)	219-145-8	2372-82-9	4	Nouryon Surface Chemistry AB

• If not, what is the issue: *Wrong CAS No for AS,*

• *DAFM is not listed on Art 95 list so cannot purchase from them*

### Invoice

Seller - Department of Agriculture,

Purchaser – PCD Ltd

1000kg - Diamine CAS No 2342-82-9.

Paid and delivered

Q3

Does product label claims match application form?

- Yes \_\_\_\_\_
- No x \_\_\_\_\_
  - Product Type – PT 4
  - Claims – to control listeria and e-coli on utensils and surfaces associated with production of food.

Safe product does not result in residues in food, natural, organic. Safe for the environment and animals and children

Kills 100% bacteria, 100% viruses, swine fever, foot and mouth in sheds, trailers, food operators, kitchens, homes, swimming pools.

# Q4

Does SDS look compliant?

- Yes \_\_\_\_\_
- No x \_\_\_\_\_
- Trade Name – **PCD Food & Feed Disinfectant**
- If not, what is the issue: *trade name is different to register and application, no classification entered for AS or product*

## 1.1 Product identifier

Trade name

Food & Feed disinfectant

## 2.2 Label elements

Labelling in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, as amended.

GHS Pictograms:

none

Signal Word:

None

Hazard Statement:

None

## 3.2 Mixtures

Chemical Name	EC-No	CAS-No	Classification (1272/2008/EC)	Weight %
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable



## Q5

Does SDS match product application?

- Yes \_\_\_\_\_
- No x \_\_\_\_\_
- Trade Name – PCD Food & Feed Disinfectant
- If not, what is the issue: *trade name is different to register and application, no CAS No identified so cannot check*

### 1.1 Product identifier

Trade name

Food & Feed disinfectant

### 3.2 Mixtures

Chemical Name	EC-No	CAS-No	Classification (1272/2008/EC)	Weight %
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Q6

Does SDS (section 2.2) match product label?

- Yes \_\_\_x\_\_\_
- No \_\_\_\_\_
- If not, what is the issue: *As neither have classification, this is missing and required.*

- Q7
- Is label compliant? (e.g. trade name, AS name and content, claims, PCS No same as register?, CLP from section 2 of SDS, instructions for use & disposal, Use biocides safely & Sus.... Included etc.)
- Yes \_\_\_\_\_
- No \_\_\_x\_\_\_
- If not, what is the issue:
- ***It is not compliant with most of the requirements identified in Art 69. No H or P statements, trade name different, no content of AS, no instructions of use or disposal, no user category, claims do not match notification, indication the product is safe using words not allowed such as natural and an image of a child and dog. Indicates it is environmentally friendly but contains a pictogram indicating it is damaging to the environment, does not indicate to use safely and sustainably. No information on poisons centre. No batch number, label version number Etc...***

-

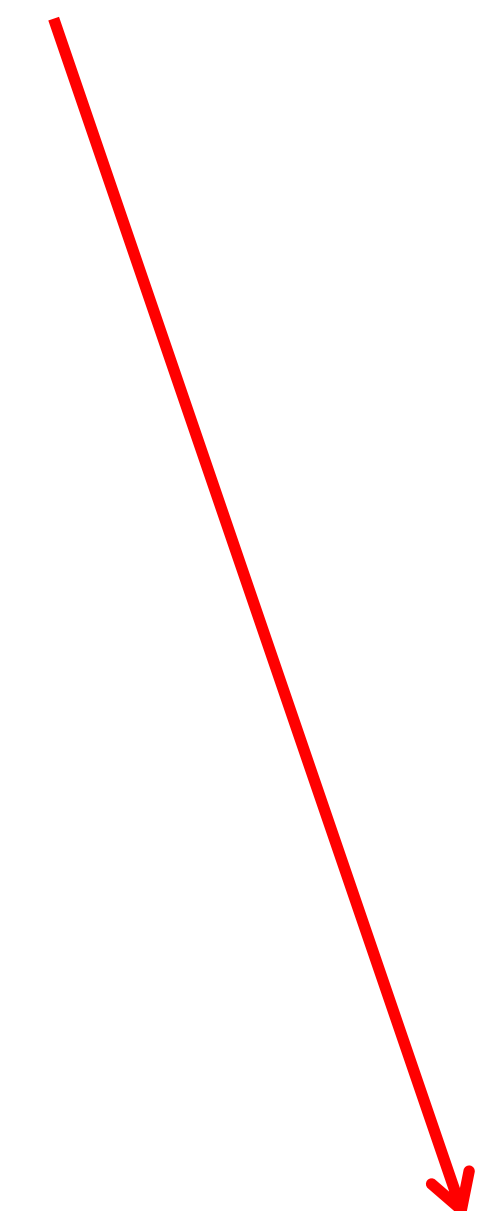
# Example 3

# Example 3

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name – PCD Toilet Cleaner
- Active substance(s)
- L – (+) – Lactic Acid (CAS No 79-33-4) - 1.00% w/w
- Salicylic Acid (CAS NO 69-72-7) - 0.55%w/w
- Product Type – PT 2
- Claims – to disinfect and clean around toilets for the protection of human health, kills 99.9%bacteria

# Q1

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_x\_\_\_ **because 1 AS in product is still in progress**
- Authorisation\_\_\_\_\_
- Simplified Authorisation\_\_\_\_\_
- Treated Article, no application required\_\_\_\_\_
- AS not in review programme \_\_\_\_\_



Salicylic acid	200-712-3	69-72-7	 PT02		Netherlands	Initial application for approval in progress Commission decision	
----------------	-----------	---------	--	--	-------------	---	---

Q2

Is LoA / LoS adequate?

- Yes x **LoA for approved substance and invoice for in progress substance from companies on Art 95 list**
- No \_\_\_\_\_
- If not, what is the issue \_\_\_\_\_

Salicylic acid	200-712-3	69-72-7	2	Dept Of Agriculture
L-(+)-lactic acid	201-196-2	79-33-4	2	Dept Of Agriculture

Q3

Does product label claims match application form?

• Yes

• No

• Product Type – PT 2

• Claims – to disinfect and clean around toilets for the protection of human health, kills 99.9% bacteria

Containing Lactic Acid 1% and Salicylic Acid 0.55% for application to toilets to kill 99.9% bacteria



Q4 – Does SDS look compliant?

- Yes \_\_\_\_\_
- No \_\_\_x\_\_\_
- If not, what is the issue: *missing contact details in section 1*

Telephone

Telefax

Responsible Department

Email

1.4 Emergency telephone no

## Q5 – Does SDS match product application?

- Yes \_\_\_x\_\_\_ **same trade name, same CAS No as application**
- No \_\_\_\_\_
- If not, what is the issue \_\_\_\_\_

- Trade Name – PCD Toilet Cleaner
- Active substance(s)
- L – (+) – Lactic Acid (CAS No 79-33-4) - 1.00% w/w
- Salicylic Acid (CAS NO 69-72-7) - 0.55%w/w

### 1.1 Product identifier

Trade name

PCD Toilet Killer

Chemical Name	EC-No	CAS-No
L-(+)-Lactic Acid	201-196-2	79-33-4
Salicylic Acid	200-712-3	69-72-7

## Q6

Does SDS (section 2.2) match product label?

- Yes \_\_\_x\_\_\_ **text from section 2.2 on label**
- No \_\_\_\_\_
- If not, what is the issue \_\_\_\_\_

### 2.2 Label elements

Labelling in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, as amended.

#### GHS Pictograms:



#### Signal Word:

WARNING

#### Hazard Statement:

H400: Very toxic to aquatic life

#### Precautionary Statement:

P210: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

P211: Do not spray on an open flame or other ignition source.

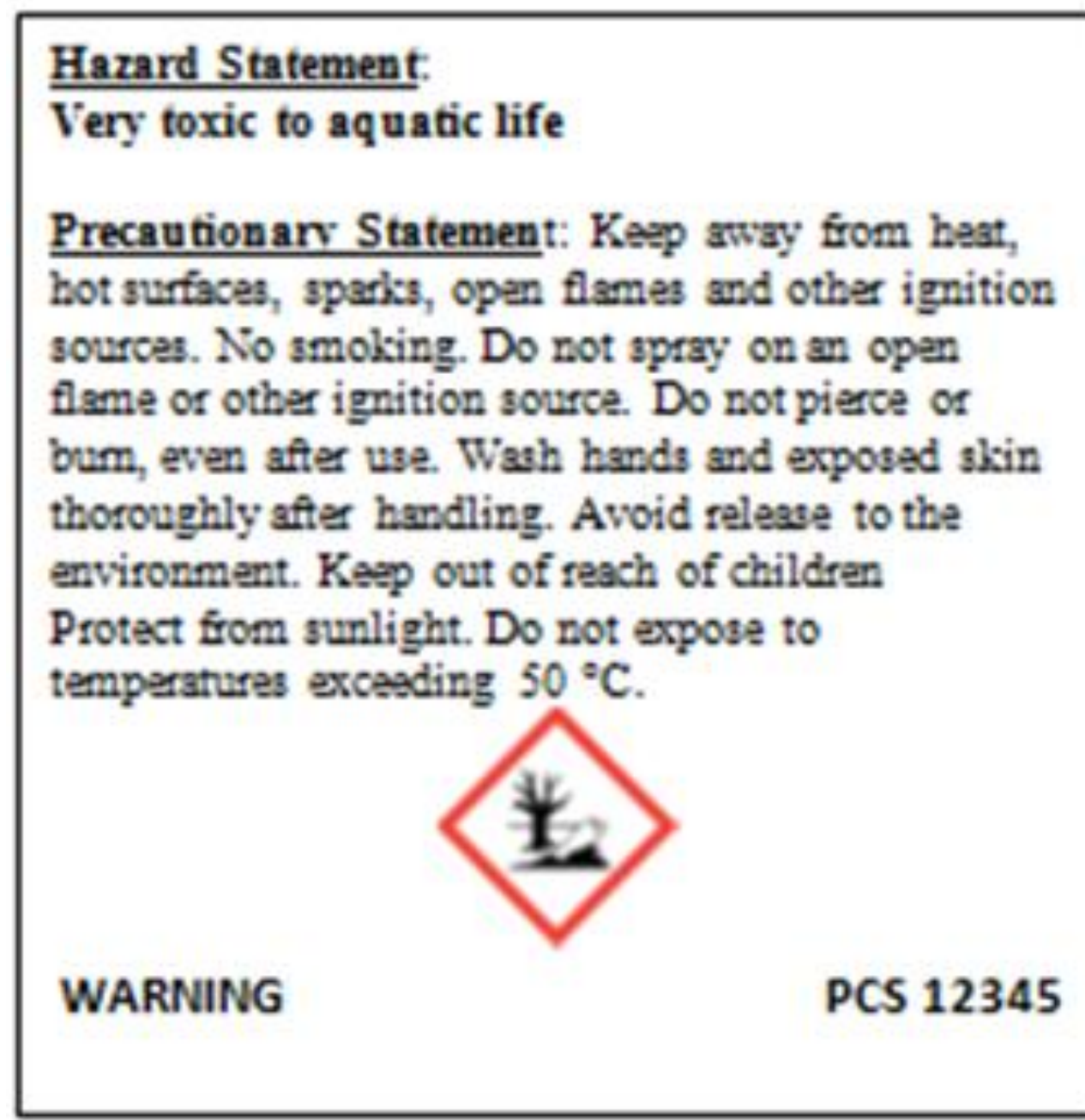
P251: Do not pierce or burn, even after use.

P264: Wash hands and exposed skin thoroughly after handling.

P273: Avoid release to the environment.

P102: Keep out of reach of children

P410 + P412: Protect from sunlight. Do not expose to temperatures exceeding 50 °C.



Q7

Is label compliant? (e.g. trade name, AS name and content, claims, PCS No same as register?, CLP from section 2 of SDS, instructions for use & disposal, Use biocides safely & Sus.... Included etc.)

- Yes \_\_\_\_\_
- No \_\_\_x\_\_\_
- If not, what is the issue

*No category of user, poor quality instructions for use, no label version, no poison information info, no information on type of formulation, no expiry date for product, wrong AS named on label, lactic acid instead of L-(+)- Lactic acid.*

*Lactic acid is an Annex I substance and requires a simplified authorisation procedure.*

# Example 4

# Example 4

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name – PCD Safe and Natural
- Active substance(s)
- L-(+)-Lactic Acid (CAS No2372-82-9) - 12.90% w/w
- Product Type – PT 5
- Claims – to disinfect water

## Q1

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_\_\_
- Authorisation \_\_\_\_\_
- Simplified Authorisation \_\_\_\_\_
- Treated Article, no application required \_\_\_\_\_
- AS not in review programme \_\_\_x\_\_\_\_\_ because L-(+)-Lactic acid is not in the review programme for PT 5

# Example 5

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name – PCD Fly Killer
- Active substance(s)
- Permethrin (CAS No 52645-53-1) - 0.552% w/w
- Product Type – PT 18
- Claims – to kill fly's and midges



## Question

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_\_\_
- Authorisation \_\_x\_\_ **because permethrin is approved for PT 18**
- Simplified Authorisation \_\_\_\_\_
- Treated Article, no application required \_\_\_\_\_
- AS not in review programme \_\_\_\_\_

# Example 6

- Application submitted By – PCD Ltd, 10 Main Street, Dublin
- Trade Name – PCD kitchen disinfectant
- Active substance(s)
- Lactic Acid (CAS No 50-21-5) – 5% w/w
- Product Type – PT 4
- Claims – kills 99.9% bacteria on kitchen worktops

## Question

- What type of application needs to be submitted for this product based on the Status of the AS?
- Notification \_\_\_\_\_
- Authorisation \_\_\_\_\_
- Simplified Authorisation \_\_\_x\_\_\_ because lactic acid in an Annex I approved substance
- Treated Article, no application required \_\_\_\_\_
- AS not in review programme \_\_\_\_\_

Thank you for listening

Any Questions?

**T: 01 615 7552**

**E: [Biocides@agriculture.gov.ie](mailto:Biocides@agriculture.gov.ie)**