Hardware & Suppliers

Guidance to achieve compliance under the Biocidal Product Regulation

October 2025

Biocidal Products

The **Biocidal Products Regulation (BPR), Regulation 528/2012** is the European Regulation which sets out the framework for the registration, sale, supply and use of biocidal products. This Regulation was enacted into Irish Law by **Statutory Instrument No. 427 of 2013**.

The **Department of Agriculture, Food and the Marine** (DAFM) are the Competent Authority for Biocides in Ireland.

A biocidal product (or biocide) contains or generates an active substance(s) that is used to prevent or control various types of harmful or unwanted organisms. Such products include disinfectants, antimicrobials, preservatives, insect repellents, rodenticides and insecticides and others. Biocides control the intended target organism by a chemical or biological action. Biocides can be used by professionals and members of the public in a wide spectrum of use areas that are classified into product-types. Biocidal products are regulated to ensure they are effective and safe for persons, animals and the environment, and to minimise any unacceptable risks for people, non-target animals and the environment. The control of the marketing, sale and use of the products by DAFM is necessary to ensure only registered biocidal products are made available on the market in Ireland.

There are twenty-two categories of biocidal products, which are grouped into four main areas: **Disinfectants, Preservatives, Pest Control and Other Biocidal Products**. See Product-types - ECHA (europa.eu).

What part of the BPR applies to you?

In the BPR, the definitions applicable to you are:

*"(i) **'making available on the market'** means **any supply** of a biocidal product or of a treated article for distribution or use in the course of a commercial activity, whether in return for payment or free of charge;*

*(j) **'placing on the market'** means the first making available on the market of a biocidal product or of a treated article;*

*(k) **'use'** means all operations carried out with a biocidal product, **including storage**, handling, mixing and application, except any such operation carried out with a view to exporting the biocidal product or the treated article outside the Union;*

*(l) '**treated article**' means any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products;*

*(y) **'advertisement'** means a means of promoting the sale or use of biocidal products by printed, electronic or other media;"*

In order **to distribute, sell or advertise** any biocidal products, Irish legislation requires that the biocidal products are entered in the "Biocidal Products Register" first. The Register of biocidal products is divided between what are referred to as **"Notified"** products and **"Authorised"** products.

Advertising Biocidal Products

Article 72 of the BPR specifies the legal requirements around Advertising of biocidal products, this includes websites, home delivery apps, print etc.

Article 72 Advertising

1. Any advertisement for biocidal products shall, in addition to complying with Regulation (EC) No 1272/2008, include the sentences 'Use biocides safely. Always read the label and product information before use.'. The sentences shall be clearly distinguishable and legible in relation to the whole advertisement.

2. Advertisers may replace the word 'biocides' in the prescribed sentences with a clear reference to the product-type being advertised.

3. Advertisements for biocidal products shall not refer to the product in a manner which is misleading in respect of the risks from the product to human health, animal health or the environment or its efficacy. In any case, the advertising of a biocidal product shall not mention 'low-risk biocidal product', 'non-toxic', 'harmless', 'natural', 'environmentally friendly', 'animal friendly' or any similar indication.'

You can check the registers of products online at:
http://www.pcs.agriculture.gov.ie/registers/biocidalproductregisters/

- A Notified product has a "PCS No" which is a unique identifier. It will have 5 digits starting with 9 (PCS 9xxxx) or 6 digits starting with 1 (PCS 1xxxxx). Notified product are transitional products on the market whilst the evaluations are ongoing. These will all become revoked and replaced with Authorised products following completion of the evaluation.
- An Authorised product has an "IE/BPA No" or "EU No" which is a unique identifier. The IE/BPA Number has 5 digits and starts with a 7 (IE/BPA 7xxxx) but where there are products evaluated under one application, their approval number will also include a suffix (IE/BPA 7xxxx-001 or IE/BPA 7xxxx-01-001). Each suffix is linked to a different trade name/colour and is a unique identifier. An EU Number is assigned by the Agency (ECHA) for a union authorisation which allows the product to be placed on the market in every member state in Europe. The EU number starts with EU, followed by a hypen, 7 digits, a hyphen and 4 digits, it may also have additional suffix (EU-xxxxxxx-xxxx or EU-xxxxxxx-xxxx x-x).
- Authorised products have been evaluated and proven safe and efficacious ONLY for the use(s) specified on the product label. Some authorised products have restrictions on sale and use, some specify who they can be sold to, and some such as anticoagulant rodenticides require wholesalers and retailers to keep records of goods in and goods out for professional and trained professional use products. Please make yourself aware of any restrictions linked to the sale and use of authorised products.
- The PCS or IE/BPA or EU number **MUST be printed on the product label.**

- Regular audits of products should be carried out every 6-12 months to ensure they remain compliant. When checking the status of product on either Register, if the status says "**Revoked**", this means DAFM has withdrawn the prior notification/approval for that product. You will need to check if the revoked product has a period of grace applied. Details in relation to revocation and sell out of products are as follows:
- **Product Revoke Date** = Date which product(s) are revoked by DAFM/Agency and the authorisation holder may no longer place product on the Irish market from this date. Existing stock on the market can be sold out, but no new products can be made available on the market from the date of revocation.
- **Sell Out Date of Revoked Products** = this date is specified on the register; you CANNOT sell product after this date. It is typically 180 days after the date of revocation. Existing products on the market can be sold out.
- **Use-by Date of Revoked Products** = this date is specified on the register. You should inform customers that the product is revoked and that the product must be used by a specific date. If the end-user is identified using the product after this date, enforcement action may be taken for use of an illegal biocidal product.
- Further guidance on the product registers and details of all product types can be found at: Glossary and abbreviations for biocide register 16-07-2024 170724.pdf (agriculture.gov.ie)

Examples of Biocidal Products marketed in Hardware Retailers*:

- Rodenticides (Rat and Mice Poison) – See below
- Repellent products including impregnated repellent collars for pets
- Wood Preservatives
- Algae, mould or slime removal/protection products on hard surfaces
- Paints with a claim to prevent/destroy mould on walls or structures
- Drinking Water Disinfectants
- Insecticide products which can include bait stations (i.e., Ants, Wasps, House Fly)
- Hats or Coats with an insect repellent in the fabric
- Construction Material Preservatives (Non-Wood)
- Any product with a claim which kills or controls harmful organisms such as antibacterial/antimicrobial/sanitising/kills 99.9% of bacteria etc.,

Other Biocidal Products that may be marketed in Hardware Retailers*:

- Lime (for animal housing)
- Naval dips for corporal hygiene
- Teat Dips for corporal hygiene
- Disinfectants used in Milking parlours (closed milk lines)
- Disinfectants used for disease prevention and biosecurity.
- Hoof disinfectant products
- Veterinary Hygiene products

Treated Articles that may be marketed in Hardware Retailers*

- Fencing posts treated with a biocidal active substance
- Paints with an in-can preservative or film preservatives
- Any product which has a claim to protect the product such as paint.
- Dish cloth with antimicrobial properties

*Note: this is not an exhaustive list.

Rodenticides

Rodenticides are authorised biocidal products and have an IE/BPA number on the label. Due to the toxicity of these products, the importance to have such products for control of rodents and the likelihood of poisoning of non-target organisms, further restrictions to sale and use apply. These products are split into three categories of use

- **Amateur users** can only purchase small pack sizes and use in and around buildings.
- **Professional users** can only use in and around buildings but have access to larger pack sizes as they have received some training. Professional use products can only be sold to professional users that provide proof of competence, such as Herd, HPR and HPF No, sales records must be kept.
- **Trained professional users** can purchase and use trained professional use products as per label instructions, which may include use in open areas, waste dumps, burrows and sewers, as well as permanent baiting. Trained professional use products can only be sold to trained professional users that provide proof of competence, such as PMU No. Sales records must be kept.
- The user category will be printed on the label.

Trained professional users must have competed training and must be registered with DAFM as a Pest Management Trained Professional User (PMU). PMUs must maintain CPE, if they don't maintain CPE, they will be revoked from the register and cannot purchase or use anticoagulant rodenticides. The PMU details can be confirmed on our website here, a small number of PMUs have asked not to be listed on the register, you can contact the office (016157552) for confirmation that they are PMUs.

IMPORTANT: RECORD KEEPING REQUIREMENTS

Wholesalers and Retailers of professional and trained professional use anticoahulant rodenticides must keep records as follows:

Purchases from suppliers / returns from customers, i.e., **GOODS IN RECORDS**;

- Name and address of supplier;
- Name of the product;
- IE/BPA No. of the product;
- Pack size;
- Quantity purchased / returned;
- Date purchased / returned;
- The batch numbers.

For sales, i.e. **GOODS OUT RECORDS**

- The name and address of each business supplied with rodenticides;
- The name of the product(s);
- The IE/BPA No. of the product(s);
- The pack size(s);
- The volume(s) supplied;
- The date purchased;
- The PMU No. (only applicable for purchase of trained professional use products by pest control companies);
- The Herd/Flock/HFR/HPR No. (only applicable to professional use products).
- The batch numbers of the product(s) supplied/sold.

N.B. Records should be retained for a period of 5 years from the date of invoice creation and must be made available to an authorised officer on request

Further information

Further information on biocides can be found on our website:
https://www.pcs.agriculture.gov.ie/biocides/

Any questions in relation to biocides can be sent to our helpdesk: biocides@agriculture.gov.ie