

Discussion paper: Applicability of risk mitigation measures for PT18 products for industrial textile treatment.

FR CA has received an application for a permethrin-based PT18 product to be used by industrial users for “vector protection finishes of textiles against mosquitoes and ticks” and for “wool protection against clothes moths and carpet beetles”. Treated textiles are used for military uniforms, forest workers clothes, trekking clothes for the general public. Wool is intended to be used for clothes as well as for garments, carpets...

In the course of the assessment, unacceptable risks for the environment during the application of the product as well as during the service life of the treated fabrics have been identified. Risk mitigation measures can be proposed by applicant and RMS. However, as the same or similar issues are probably encountered by other MSs who assess very similar products, FR CA proposes that these RMMs are discussed in a general manner prior to the peer-review of each PAR instead of being treated on a case-by-case basis.

FR proposed way forward:

Concerning the application step, FR CA proposes to authorize the product with a RMM that aims at avoiding any release in the environment. The following is proposed: “Application solutions must be collected and reused or disposed of as hazardous waste. They must not be released to soil, ground- and surface water or any kind of sewer”.

To FR CA also proposes that effluent monitoring is put in place on sites where the product is used. Hence, the following request is proposed as post-authorization condition: “monitoring of permethrin concentration in effluent has to be put in place. Results must be provided to the competent authority at the renewal of the authorization”

Concerning the service life, FR CA propose that the product is restricted to the treatment of non-washable wool. MS could consider authorizing other uses according to 19(5) or 2(8).

Outcome of the e-consultation:

CG members agreed that for PT18 products where a risk would be identified for the environment during both, application of the product, and the service life of a treated article with that product:

- a) Concerning the application of the product: products could be authorized with the following RMM “Application solutions must be collected and reused or disposed as a hazardous waste. They may not be released to soil, ground, surface water or any kind of sewer”.

- b) Concerning the service life of treated fabrics, products could be authorized considering the following:
 - According to Article 19(1) for the treatment of non-washable wool against target organisms, with a restriction that would need to appear on the label of the product such as “for production of non-washable wool only” or “Not to be used for production of washable textiles”

 - According to Article 19(5) or 2(8) for the treatment of textiles against mosquitos.

If those uses included in subpoint b) are authorized, Article 58(3) and Article 58(4) of the BPR should apply.

The agreement reached would be without prejudice of any further consideration on whether these treated articles might have a primary biocidal function and therefore become biocidal products.