

A.I.S.E. COMMENTS TO TRIS/(2022) 00069

Draft Order supplementing Order No 10/368/11/2010 of the Minister for Health, the Minister for the Environment and Forestry and the President of the National Sanitary Veterinary and Food Safety Authority approving the approval procedure for biocidal products that are placed on the Romanian market

A.I.S.E. wishes to inform the European Commission of the potential EU Single Market and environmental impact imposed by the Romanian order supplementing Order No 10/368/11/2010 of the Minister for Health, the Minister for the Environment and Forestry and the President of the National Sanitary Veterinary and Food Safety Authority approving the approval procedure for biocidal products that are placed on the Romanian market.

The below proposals from the draft Order will have a significant impact on companies placing biocidal products on the Romanian market:

1. The proposed packaging limitation in article 4(1)a), subparagraph a.4 (1 liter for PT 1, 10 liters for PT 2, PT 3, PT 4) will lead to disruption of the manufacturing processes since it will require adaptation of the productions flow specifically for one market, in terms of specific packaging, labelling, storage and delivery. In addition, imposing a limitation on packaging capacities will lead to more packaging materials used (e.g. closing caps, labels, transport pallets, etc...), which is in contradiction with the spirit of EU principles of Green Deal and sustainability.
2. The proposal that the test reports must be issued by an accredited laboratory according to 4(1)g), subparagraph g4 goes beyond the Biocidal Product Regulation (EU) No 528/2012 requirements. As such, this proposal will increase the administrative burden for companies that want to place biocidal products on the Romanian market.

About A.I.S.E.

A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products, is the official representative body of this industry in Europe. Our membership totals 29 national associations across Europe, 17 corporate members and 11 value chain partners. The A.I.S.E. network of members represents over 900 companies supplying both household and professional cleaning and maintenance products and services across Europe.

