

SC Johnson contribution to TRIS notification 2021/42/D – Germany

Ordinance on the reorganisation of secondary national legislation on biocidal products

SC Johnson (SCJ) is one of the world's leading manufacturers of household cleaning products and products for home cleaning, home storage, air care and pest control. Headquartered in Racine, Wisconsin USA, we employ approximately 12,000 people worldwide and approximately 2000 in Europe – including at our Europlant facility, in the Netherlands, and our plant in Gorzow, Poland. Brands that we manufacture and market in the EU include Glade®, Duck®, Mr Muscle®, Pledge®, Autan®, Baygon® and RAID®.

We fully support the regulation of biocides, and agree that the protection of human health, animal health and the environment is paramount.

Every ingredient in every SCJ product, including biocides, is evaluated through the Greenlist™ programme, our initiative to continually improve our products by choosing ingredients that better protect human health and the environment. The centrepiece of Greenlist™ is a science-based, four-step evaluation that looks at both hazard and risk. It is grounded in best-in-class data collection and driven by our commitment to continually improve our products. It has been reviewed by numerous experts over the years, including a recent peer review in 2017.

In addition, SC Johnson's biocidal products undergo very careful and thorough toxicological reviews that evaluate their impact on health and the environment and are compliant with all EU and German laws and standards. At SCJ we also apply additional stricter standards when choosing the ingredients, we use in products. As part of our commitment to transparency, we share the ingredients in our products with consumers at [WhatsInsideSCJohnson](#).

With regard to TRIS notification 2021/42/D, submitted by Germany, placing sales restrictions on certain biocidal product types (PTs) we have a number of comments:

- **we disagree with the proposal for strict sales restrictions on PT 18 products** (insecticides, acaricides and products to control other arthropods), which goes beyond the existing EU rules set out in the Biocidal Products Regulation (EU/528/2012).
- **The proposed sales restriction in Germany represent a significant hurdle for companies and consumers alike, which is equivalent to a trade restriction. The existing rules sufficiently provide for the protection of consumers, and the environment, while allowing safe access to essential biocidal products:**
 - a. *The labelling on all our insecticide products carry the information that consumers need for effective and safe use and is presented in an understandable way. All relevant information on our products, including active ingredients and correct storage, usage and disposal instructions, is made available in our labelling as well as other communications.*

- b. *The extensive training requirements that would be required for staff to sell PT18 products are not feasible, neither for stationary nor online retailers. Turnover of personnel in retail stores is high and would require significant levels of retraining and education.*
- c. *The requirements and restrictions as they are right now would lead to biocidal products not being easily available to consumers as only specialised retailers would be able to fulfil these requirements, thus preventing consumers from buying products that help prevent the spread of dangerous diseases.*
- d. *Without adequate access to biocidal PT18 products we may see a lot of “home remedies” appearing, many of which are shared on the internet today. The issue is that these home remedies are not tested and are typically not effective. Therefore, legislating to limit the use of these already highly regulated products may be counter-productive in terms of public hygiene with the risk that consumers will turn to non-regulated products instead.*

In conclusion SC Johnson:

- **View this German Regulation as a highly disruptive, in terms of both EU trade, and the free movement of goods, with specific regard to the PT18 products - insecticides, acaricides and products to control other arthropods.**
- **Believe that existing laws and our company processes such as the Greenlist™ programme already provide for *the protection of human health, animal health and the environment.***