

Contribution to TRIS notification 2021/42/D (Germany)

Detia Freyberg GmbH provides a various range on insecticides for consumer use. We are fully committed to the objectives of Regulation (EU) No. 528/2012 concerning the making available on the market and use of biocidal products (BPR) and agree that the protection of human health, animal health and the environment is the key for sustainable products.

Regarding the TRIS notification 2021/42/D we are of the opinion that the requirements imposed by this intended German regulation on certain types of biocidal products go far beyond the scope of the BPR, which already provides a high level of protection for human health, animal health and the environment. Therefore, we have the following comments on the notification:

- As the product label already include all necessary information on how to use the product and which possible risk management measures have to be taken, we do not believe that a self-service ban and/ or a compulsory talk upon supply will result in an improved level of protection.
- The calculation on the administrative burden for industry is way too low, which distorts the cost-benefit-scenario.

Therefore, we believe that this intended regulation will not lead to a considerable improvement of safety, while providing a significant burden for companies and costumers. In our opinion implementing the intended regulation will pose the following risks:

- Smaller stores will not be able to implement the new measures and therefore no longer be able to sell those biocidal products, which are in the scope of the intended regulation.
- For EU-based companies outside Germany, the requirements of to ensure that the customer belongs to the specified user category and to provide the telephone or video sessions in German language would clearly be an additional trade barrier.
- If costumers do not have direct access to relevant biocidal products they may use "home remedies", which conceivably are not effective or even may cause harm.

In conclusion we are of the opinion that current legislation is sufficient to ensure effective and safe products that help preventing harm to human health, animal health and the environment and no further national legislation is needed.