

Do you sell or use biocides with your company name on?

If you do, are you aware of the consequences to your company of the Biocidal Products Regulations (BPR)?

Since September 1st 2015 any company placing a biocidal product on the market in the UK has a legal responsibility to ensure that the active biocidal ingredient in the product is manufactured by a company who has registered the ingredient on the ECHA Article 95 list. The ingredient must be registered both for the product type (application) and the country of use. If it is not, use of that ingredient is no longer allowed. This regulation also includes any biocidal agent produced in-situ e.g. chlorine dioxide and any pre cursor chemicals used to produce it.

The next stage of the registration process will require any unique biocidal product (by name, supplier, pack size, colour, concentration, formulation) to be submitted for approval by the Competent Authority in the UK, the HSE. This will incur as yet unconfirmed costs, but to maintain the unique identity this is likely to be £50,000 plus.

What should you do now?

In the first instance speak to your current chemical product supplier regarding products supplied since September 2015. In most cases they will be a blender/formulator, purchasing the active ingredient from the manufacturer, and will be able to confirm what, if any, biocidal products that you currently use may be of concern.

Longer term, it is the common water treatment industry belief that it will not be economically viable for small and medium sized service providers to continue supplying their own uniquely identifiable biocide products. The ultimate conclusion to this subject is not yet clear but companies need to be aware that there will undoubtedly be effects on their commercial activities and should begin to plan for this eventuality with their supplier as soon as possible.

BACS Membership

BACS members are updated regularly on all regulatory affairs that effect the Water Treatment industry and BACS actively lobby both government departments and EU commissions on subjects of interest to the UK chemical industry.