# Comments table –Draft ESD PT 6 – Version 2015-07-03

**Commenting MSCA/industry contact information:**

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| --- | --- |
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*(Please update the Table of contents before submitting, by right clicking on it and choosing “update fields” and then “update page numbers” only.)*

**Instructions:**

1. Use running numbers in column a) and ensure that any comment number is not repeated.
2. In column b), make a specific reference to the chapter in the ESD if relevant.
3. Please make concise comments in column c). If more than 500 characters are needed, include an annex to the commenting table.

# 1 - Introduction

| Commenting table – Draft ESD PT 6 – Version 2015-07-03 | | | | **e) Proposal: open or closed point** |
| --- | --- | --- | --- | --- |
| **a) No.** | **b) Reference to ESD** | **c) MSCA/industry: Comment** | **d) Response** |
|  | 1.1 and other chapters | The terminology washing and cleaning fluids is not very common. Better use liquid detergents. |  |  |
|  | 1.1 | The BPR implements an authorisation process for biocidal products containing active substances listed in the Union list of approved active substances (Art. 9(2)) and Annex I. |  |  |

# 2 - Preservatives for products during storage (PT 6)

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|  |  |  |  |  |

# 3 - Specific emission scenarios for sub-categories in product type 6

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|  | 3.1.4.2 | “The use of detergents and cleaning fluids is similar to the use of disinfectants in the private and health area.” What does it mean? In what respect is the use of detergents similar to the use of disinfectants? |  |  |

# 4 - Cumulative Risk assessment and Aggregated Environmental Exposure Assessment

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|  |  |  |  |  |

# 5 - References

| Commenting table – Draft ESD PT 6 – Version 2015-07-03 | | | | **e) Proposal: open or closed point** |
| --- | --- | --- | --- | --- |
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|  |  |  |  |  |

# Appendices

| Commenting table – Draft ESD PT 6 – Version 2015-07-03 | | | | **e) Proposal: open or closed point** |
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| **a) No.** | **b) Reference to ESD** | **c) MSCA/industry: Comment** | **d) Response** |
|  | Appendix 2.1 | “Emission scenario for calculating the release of disinfectants used in human hygiene biocidal products (private use) based on an average consumption for products containing the biocide.” *What is meant by human hygiene biocidal products = product type 1?* |  |  |
|  | Appendix 2.1 Table 4.2 | Fraction of 1 for PT 1 Biocidal Product (e.g. Hand disinfectant) released to wastewater is definitely too high. |  |  |
|  | Appendix 2.1 page 85 | 0,57 washing events per day corresponds more likely to a 4-Person household! 0,39 washing events per day is more realistic!  average household size in Germany: ca. 2 persons (destatis)  average loading efficiency in Germany: 70% (A. Kruschwitz, *Detergent dosing behaviour in laundry washing*, 45th International wfk Detergency Conference – May 3rd - 5th, 2011)  Produkt-Nachhaltigkeitsanalyse von Waschmaschinen und Waschprozessen, Öko-Institut, 2004, http://www.oeko.de/oekodoc/257/2004-036-de.pdf |  |  |
|  | Appendix 2.1 page 85 | Fraction of 1of houses using laundry detergents with in-can preservatives is too high. 0,5 would be a more realistic number. Fraction of laundry detergents without any preservatives according to PT 6 of BPR (powder or granulate) yields in Germany 50%. |  |  |
|  | Appendix 2.1 page 85 | 200 ml “consumption of washing fluid per application is much too high. 100 ml would be more realistic value. |  |  |
|  | Appendix 2.1 page 85 | 1000 ppm active in the end-mixture is propably too high! 100 ppm would be more realistic. |  |  |