**A.I.S.E. Biocides WG - The Next Challenge for the Industry: Biocidal claims under BPR**

**Proposal:** Set up a new sub-group/activity with the objective of delivering a clear and harmonised approach by authorities in the area of biocidal claims for PT 1, 2 & 4 biocidal products with a specific focus on ‘user friendly’ claims.

**Scope/Issue:**

1. ***Processes:***
2. Clarify where the boundaries are as to which claims are to be included in the biocidal product authorisation and which non-biocidal claims are not part of it.
3. Clarify what level of authorisation will be granted for the claims, e.g., word for word approval, generic claim approval of scientific claims where changes in wording are allowed for the claims as long as the meaning is not changed.
4. Clarify how conflict between MS evaluation will be handled. Clarify the process & general principles e.g., when one CA will approve a claim and a mutual recognition country will not. Trying to prevent that all conflicts go to the CG.
5. ***Types of Claims:***

We understand that some Authorities have started to question some generic areas of claims as mentioned in the SPC and the label. Claims are the way to explain efficacy to end-users in a language they understand (on and off pack). Especially in the consumer area they are the only communication to the consumer, so it is key to be able to drive a clear understanding of claim positioning. Here we don’t want scientific wording, and want to have freedom to use end-user friendly language that is understandable by lay persons, including those in the professional sector.

Some examples of typical end-user friendly language are e.g. use of the term ‘germs’ and simple numerical germ kill/reduction/removal figures such as ‘99.9% germ kill’\*.

**Out of scope:** product specific biocidal claims, how to structure claims, non-biocidal claims, claim substantiation.

**Deliverables:**

Agree a harmonised approach to biocidal claims for PT 1, 2 & 4 biocidal products with the Commission and the Co-ordination Group/ Competent Authorities (TBD). Including:

* Confirmation that only biocidal claims or biocidal action related claims are part of the biocidal product authorisation;
* Confirmation that flexibility is allowed in claims wording provided that meaning does not change on the label and other communication of the product;
* Clarity on the use of specific end-user friendly generic terminology (e.g. ‘germ’) or numericals;
* Confirmation that a consistent approach to biocidal claims and their controls will be implemented across the EU.

**Risk of doing nothing:** Potential extension of an already long product authorisation process whilst discussions on claims take place for National Authorisation, MR and Union Authorisation. Also risk in non-harmonised outcomes between dossier going for National Authorisation, MR and Union Authorisation.

Additional complexity and bureaucracy by having to go through “minor change” procedure for non-significant changes in the claims’ wording.

\* the 99.9% is not meant to represent actual log reductions (which typically are higher), but rather attempts to convert germ reductions into consumer understandable claims language. For clarification: the dossier will reflect the mandatory log reductions.