

## **ANNEX I**

### **QUESTIONNAIRES**

This Annex contains the questionnaires issued to Member State competent authorities, industry and non-governmental organisations (see section 1.4 of the report regarding the methodology of the study), the responses to which are referred to throughout the report.

# Analysis of measures geared to the sustainable use of biocidal products

## Questionnaire for Member State competent authorities

Organisation / Authority	
Country	
Name of person answering questionnaire	*
Position	*
Daytime telephone number	*
Email	*

\* This information will only be used by Milieu Ltd in the case that clarifications are needed and in the context of this Study, but will not be made publicly available.

### 1. Promotion of best practices

This first section of the questionnaire seeks to gather examples of existing guidance documents for the use of biocidal products and the promotion of best practices. We are aware that Member States have responded to a questionnaire by our organisation in 2010, and that this information was collated in our *'Study towards the development and dissemination of best practice on sustainable use of biocidal products'*<sup>1</sup>. We are therefore interested in recent developments and guidance which has been prepared in the last three years.

1.1 Has your organisation developed guidance on the use of biocidal products?

- No  
 Yes

If your answer is 'yes', please provide the title, year and other relevant reference details below, and please send us an electronic copy if possible (or indicate below the web site where we may access the guidance). Please also outline the reasons for producing such guidance (was it solely relating to the practical use of biocidal products or was it to incorporate legislative changes in other areas such as REACH and CLP?)

1.2 Would you (or someone else in your organisation) be willing to answer further questions on your reasons for developing the guidance and how it has been used in practice?

- No  
 Yes

---

<sup>1</sup> Milieu, Study towards the development and dissemination of best practice on sustainable use of biocidal products, Final Report, October 2010, available at <https://circabc.europa.eu/d/d/workspace/SpacesStore/69324378-4800-44ec-a5ce-37106720e6ec/Biocides%20best%20practices%20for%20sustainable%20use.pdf>

1.3 Are you aware of any guidance or other documents (e.g., information mechanisms, industry standards etc.) developed by other organisations on the use of biocides that you consider as best practice?

- No
- Yes

If your answer is 'yes', please provide the title, year and other relevant reference details below. If possible, please indicate a person we may contact the relevant organisation(s). If available, please send us an electronic copy, or indicate below the web site where we may access the guidance.

1.4 Why do you consider that the guidance in Question 1.3 represents best practice?

1.5 Are there any economic incentives in place in your country to encourage the sustainable use of biocides, for example where different levels of fee are applied within the permitting system, depending on the hazardous nature of the substance in order to encourage industry to move to a less hazardous substance?

- No
- Yes

If your answer is 'yes', please provide details of the incentive, basis of calculation, reference to the relevant legislative instrument establishing such a system, and indicate whether it is applied nationally or at a local level.

1.6 Are there any information mechanisms used, such as information campaigns for professionals and businesses and/or the general public, in order to encourage the sustainable use of biocidal products? If so, please describe the nature of these, whether they are run jointly with social partners/trade associations, who is their target audience, and whether they were product specific or applied generally to the use of biocidal products.

## 2) The need for additional measures to reduce the risk to professional users

2.1 Are you aware of any exposure risks for professional users of a particular biocidal product (those involved in the application of biocides in a professional context), that are not adequately covered by risk mitigation measures set out in existing health and safety (such as the requirement for personal protection equipment) and chemicals legislation (as set out in the safety data sheet)?

- No  
 Yes

If your answer is 'yes', please provide details of the product type, its use, how it is applied, and details of the exposure risk.

Product type (PT)	Use	Application	Exposure risk

2.2 Do you consider that there is a gap in the existing risk mitigation measures aimed at the protection of professional users, or does the exposure risk arise as a result of the poor application of existing available risk mitigation measures?

2.3 Are you aware of any emergency/incident/accident or more importantly 'near-miss' scenario/dangerous occurrence which could have potentially caused exposure to professional users and/or others?

- No  
 Yes

If your answer is 'yes', please provide further details below:

2.4 Does your authority apply a specific definition of 'professional user'? Who do you regard as professional users for each product type?

2.5 Does your country operate a scheme for the certification of professional users?

- No  
 Yes

If your answer is 'yes', please provide relevant details of the certification scheme below.

2.6 What education/training initiatives and guidance is available to professional users on the application/use of biocidal products? Please specify the sector (by main group or product type) to which the guidance applies.

2.7 Do you consider that additional measures are required to reduce the risks to professional users?

- No
- Yes

If your answer is 'yes', please provide reasons why you think such measures are required and please distinguish between whether such measures are required for indoor and/or outdoor use.

### 3) Approaches to monitoring the use of biocidal products

3.1 Does your country collect data on the use of biocidal products?

- No
- Yes

If your answer is 'yes', please provide details on the following aspects:

What data is collected? (Does this covers the manufacture, import/export, and/or sales of biocidal products? Is data collected for specific product types only or for all biocidal products? Is it only data on total volumes that is collected or is data on the active substance also collected? Does the data collected include information on the adequate use of biocidal products?)

Over what period does the Member State collect this data/ how frequently is the data collected?

Does the data distinguish between professional and non-professional use?

Why does your country collect this data?

3.2 Does your country use specific IT tools to support the monitoring of the use of biocidal products?

- No
- Yes

If your answer is 'yes', please provide details.

3.3 Does your country have a scheme in place to monitor the use of illegal products?

- No
- Yes

If your answer is 'yes', please provide details.

#### 4) Risks posed by biocidal products in specific areas

4.1 Does your country prohibit or restrict the use of biocides in certain areas, such as public parks and gardens, sports and recreation grounds, school and children's playgrounds, nature conservation areas etc.?

- No
- Yes

If your answer is 'yes', please provide relevant details of the prohibition/restriction (e.g. legislative measure, date of adoption etc).

4.2 Do you consider that additional measures are required to address exposure risks posed by the use of biocidal products in specific areas that are not adequately covered by existing risk mitigation measures?

- No
- Yes

If your answer is 'yes', please provide reasons why you think such measures are required, and provide details of the product and application/use that such measures should be applied to and the specific areas where there is an exposure risk.

Product type (PT)	Use	Application	Exposure risk

### 5) Integrated pest management principles (IPM)

5.1 On the basis of the general principles set out in Annex III of Directive 2009/128/EC on the sustainable use of pesticides<sup>2</sup>, what integrated pest management (IPM) measures have been adopted in your country?

5.2 Do you consider that IPM principles could be applicable to biocidal products, either generally or to specific product-types? If so, please specify which PT you consider this to be applicable to?

### 6) General

6.1 Does your country have an interdepartmental or inter-ministerial committee or group that exists to coordinate and communicate on matters affecting the use of biocidal products across a range of sectors?

6.2 Based on your experience with the application with the Biocidal Products Regulation (authorisation process), how does the BPR contribute to the sustainable use of biocidal products?

<sup>2</sup> Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:en:PDF>

6.3 At present, advertisements for biocidal products cannot claim that the product is a ‘low-risk biocidal product’, ‘non-toxic’, ‘harmless’, ‘natural’, ‘environmentally friendly’, ‘animal friendly’ or any similar indication. To what extent do you feel that the advertising restrictions for biocidal products are too strict?

6.4 Do you have any further suggestions for appropriate measures for the sustainable use of biocides (such as the introduction of reduced fees for low risk products, taxes on biocides, sale restrictions, certification of professional users or retailers, risk awareness raising campaigns, use of an eco-label, equipment for application etc.), which have not already been mentioned above? Please distinguish between measures for professional users and for consumers.

6.5 Are there any other issues arising in relation to the sustainable use of biocidal products that have not been covered by these questions, which you wish to comment on?



## Analysis of measures geared to the sustainable use of biocidal products

### Questionnaire for companies, industry associations, worker protection associations and users

Company/Organisation	
Name of person answering questionnaire	*
Position	*
Address	*
Daytime telephone number	*
Email	*
Number of employees in company	*
Primary business activity of company	
Type of organisation	Manufacturer/retailer/user <sup>3</sup>
Product/product type	

\* This information will only be used by Milieu Ltd in the case that clarifications are needed and in the context of this Study, but will not be made publicly available.

#### 1. Promotion of best practices

This first section of the questionnaire seeks to gather examples of existing guidance documents for the use of biocidal products and the promotion of best practices. We are aware that industry and professional organisations have responded to a questionnaire by our organisation in 2010, and that this information was collated in our '*Study towards the development and dissemination of best practice on sustainable use of biocidal products*'<sup>4</sup>. We are therefore interested in recent developments and guidance which has been prepared in the last three years.

1.1 Has your organisation developed any guidance or other documents (e.g., information mechanisms, industry standards etc.) on the use of biocidal products that you consider as best practice??

- No  
 Yes

If your answer is 'yes', please provide the title, year and other relevant reference details below. If available, please send us an electronic copy, or indicate below the web site where we may access the guidance. Please also outline the reasons for producing such guidance (was it solely relating to the practical use of biocidal products or was it to incorporate legislative changes in other areas such as REACH and CLP?)

<sup>3</sup> Please specify whether your company produces biocidal products (product manufacturer or formulator), produces the active substance for incorporation by another company into the biocidal product (active substance manufacturer), or both.

<sup>4</sup> Milieu, Study towards the development and dissemination of best practice on sustainable use of biocidal products, Final Report, October 2010, available at <https://circabc.europa.eu/d/d/workspace/SpacesStore/69324378-4800-44ec-a5ce-37106720e6ec/Biocides%20best%20pactices%20for%20sustainable%20use.pdf>

1.2 Why do you consider that the documents in Question 1.1 represent best practice?

1.3 Are you aware of any other measures, such as the use of incentives/information mechanisms used to encourage the sustainable use of biocides?

- No
- Yes

If your answer is 'yes', please provide details of the measures as well as their target audience, whether it is applied nationally or at a local level, and whether they were product specific or applied generally to the use of biocidal products.

## 2) The need for additional measures to reduce the risk to professional users

2.1 For each of the five main products that you manufacture, import, and/or use, please provide details of their use, how they are applied, and any risk mitigation measures applied?

Product type (PT)	Use	Application	Risk mitigation measures

2.2 For the product type that you deal with, do the risk mitigation measures vary dependent on the quantity of biocidal product being used/applied, and/or whether the work is being carried out indoors or outdoors? If so, please provide details.

2.3 For the product type that you deal with, who do you regard as professional users? Does your organisation apply a specific definition of 'professional user'?

2.4 What steps do you take to ensure that biocidal products produced solely for professional use do not get into the general public/consumer supply chain?

2.5 What education/training initiatives and guidance is available to professional users on the application/use of biocidal products? Please specify the sector (by main group or product type) to which the guidance applies.

2.6 Are you aware of any exposure risks for professional users of the particular product (those involved in the application of biocides in a professional context), that are not adequately covered by risk mitigation measures set out in existing health and safety (such as personal protection equipment) and chemicals legislation (as set out in the safety data sheet)?

- No
- Yes

If your answer is 'yes', please provide details of the exposure risk

Product type (PT)	Use	Application	Exposure risk

2.7 Do you consider that there is a gap in the existing risk mitigation measures aimed at the protection of professional users, or does the exposure risk arise as a result of the poor application of existing available control measures?

2.8 Are you aware of any emergency/incident/accident or more importantly 'near-miss' scenario/dangerous occurrence which could have potentially caused exposure to professional users and/or others?

- No
- Yes

If your answer is 'yes', please provide further details below:

2.9 Do you consider that additional measures are required to reduce the risks to professional users?

- No
- Yes

If your answer is 'yes', please provide reasons why you think such measures are required and please distinguish between whether such measures are required for indoor and/or outdoor/external use.

### 3) Integrated pest management principles (IPM)

3.1 What measures, in addition to the use of biocidal products, do you use to address pest problems?

3.2 Do you consider that IPM principles could be applicable to biocidal products, either generally or to specific product-types? If so, please specify which PT you consider this to be applicable to?

3.3 Do you have knowledge of other integrated management tools, similar to IPM, such as the Hazard Analysis and Critical Control Points (HACCP) for the food chain safety or best hygiene practices for the public health area which could apply to biocidal products? If so, please specify which PT you consider this could be applicable to?

3.4 To what extent would measures for the harmonisation of the equipment for applications minimise exposure and guarantee a targeted dosage of biocides? Are there existing standards for equipment in use or other initiatives for standardisation of equipment?

**4) Voluntary schemes to highlight the better profile (for the environment or public health) of certain biocides**

4.1 Does your organisation have experience with an accreditation, ecological standard or other voluntary labelling scheme which could be of interest for biocidal products?

- No
- Yes

If your answer is 'yes', please provide details of the scheme, including what products the scheme applies to, number of participants, the principles/criteria used to establish the better credentials of the product and the mechanisms of control.

4.2 What approaches/tools (in addition to any that your company already applies as described above) could be used to highlight the 'green profile' of biocidal products?

**5) The need for revision of advertising and marketing provisions**

5.1 At present, advertisements for biocidal products cannot claim that the product is a 'low-risk biocidal product', 'non-toxic', 'harmless', 'natural', 'environmentally friendly', 'animal friendly' or any similar indication. To what extent do you feel that the advertising restrictions for biocidal products are too strict?

5.2 Do you have a ' biocidal product that you consider having a better profile for environment or health, but where you cannot state this in advertising due to the restrictions laid down in Article 72 of the Biocidal Products Regulation?

- No
- Yes

If your answer is 'yes', please provide details of the product, and including what impact this has on your organisation.

## 6) General

6.1 Based on your experience with the application with the Biocidal Products Regulation (authorisation process), how does the BPR contribute to the sustainable use of biocidal products?

6.2 Do you have any further suggestions for appropriate measures for the sustainable use of biocides (such as the introduction of reduced fees for low risk products, taxes on biocides, sale restrictions, certification of professional users or retailers, risk awareness raising campaigns, use of an eco-label etc.), which have not already been mentioned above? Please distinguish between measures for professional users and for consumers.

6.3 Are there any other issues arising in relation to the sustainable use of biocidal products that have not been covered by these questions, which you wish to comment on?

## Analysis of measures geared to the sustainable use of biocidal products

### Questionnaire for Non-Governmental Organisations

Organisation	
Country	
Name of person answering questionnaire	*
Position	*
Address	*
Daytime telephone number	*
Email	*

\* This information will only be used by Milieu Ltd in the case that clarifications are needed and in the context of this Study, but will not be made publicly available.

1. Please briefly describe the principle area(s) of concern to your organisation, and any specific involvement that your organisation has in matters associated with biocidal products, in particular concerning the sustainable use of biocidal products.

2. How do you see the role of NGO's in the sustainable use of biocidal products?

3. Has your organisation been involved in any information campaigns in relation to the sustainable use of biocidal products, in order to encourage the sustainable use of biocidal products? If so, please describe the nature of these, their target audience, and whether they were product specific or applied generally to the use of biocidal products.

4. Are you aware of any guidance or other documents (e.g., information mechanisms, industry standards etc.) on the use of biocides that you consider as best practice?

5. Do you consider that additional measures are required to reduce risks to professional users of particular biocidal products?

6. Do you consider that additional measures are required to address exposure risks posed by the use of biocidal products in specific areas (public parks, schools, hospitals etc.)?

7. Do you consider that integrated pest management principles (IPM) could be applicable to biocidal products, either generally or to specific product-types?

8. Do you consider that an eco-label or other scheme to highlight the better profile (for environment and public health) of certain biocidal products, could be developed for biocides?

9. At present, advertisements for biocidal products cannot claim that the product is a 'low-risk biocidal product', 'non-toxic', 'harmless', 'natural', 'environmentally friendly', 'animal friendly' or any similar indication. To what extent do you feel that the advertising restrictions for biocidal products are too strict?

10. Based on your experience with the application of the Biocidal Products Regulation (authorisation process), how does the BPR contribute to the sustainable use of biocidal products?



11. Do you have any further suggestions as to ways in which the sustainable use of biocidal products could be encouraged/improved (such as the introduction of reduced fees for low risk products, taxes on biocides, sale restrictions, certification of professional users or retailers, risk awareness raising campaigns, use of an eco-label, equipment for application etc.)? Please distinguish between measures for professional users and for consumers.

12. Are there any other issues arising in relation to the sustainable use of biocidal products that have not been covered by these questions, which you wish to comment on?