

Annex 2: Summary of questionnaire replies on measures

1. Legislation in the Member States

The following Member States have supplied information through the Commission disseminated questionnaire. For each country a summary of the information of the existing regulation is summarised.

Belgium

It is not stated in the Belgian response to the Commission's questionnaire which authority completed the questionnaire.

According to the information supplied "the use [of biocidal products] is, in principle, regulated through the mode of application, frequency, advices, specifications,...of the authorisation acts". Belgium has a mandatory qualification scheme for using biocidal products as regards salers and retailers for product types 14, 18 and 19¹. However, the information supplied is not clear and it seems like certification also is required for professional users. Certification of the application equipment is part of the certification of use and storage.

There is only few data on the impacts of the qualification scheme. Moreover, data is limited on the use of these substances. Belgian authorities are collecting data on the sale of these substances and information on professional and non-professional use is partly collected through the certification schemes. For a "holder of the authorisation who could be producer OR a national retailer", it is mandatory to supply the required information. The data is collected annually.

There are no specific restrictions on the use of biocidal products: "not on a global or spatial basis (but through the specifications of the authorisation acts)".

Moreover, Belgium has a federal programme for reduction of pesticides in agricultural use and biocides in Belgium² that builds on the federal Belgian Sustainable Development Strategy 2000-2004 (Programme Federal de Reduction des Pesticides a Usage Agricole et des Biocides en Belgique, p. 6). The program is founded federally but has competent authorities in several regions. The program contains information on the effects of pesticides and biocides on human health and environment as well as indicators for how to measure the results of the reduction programme. It also contains the measures for reducing the impacts of agricultural pesticide use and biocides on public health and the environment.

As mentioned above the program concerns both pesticides and biocides. (p. 35). In addition to transposition of community law (i.a. 2002/62/EC,

¹ For PT 19 there is only restrictions as regards type A products (c, T, T+, cancer 1&2, mutagenic 1&2, reprotoxic 1&2)

² Programme Federal de Reduction des Pesticides a Usage Agricole et des Biocides en Belgique

2001/90/EC and 98/8/EC) national initiatives has been initiated. In regards to biocides, the Belgian authorities have restricted, and in certain cases prohibited, the usage of wood protection product.

Cyprus

The information is supplied by the Cypriot competent authority, the Department of Agriculture. There is no legislation on biocides use in Cyprus other than what follows from the implementation of Directive 98/8/EC.

Estonia

The Estonian questionnaire is supplied by the Market Surveillance Authority, the Health Protection Inspectorate (HPI). Estonia has introduced a Biocides Act (Passed 12 May 2004) which "provides the requirements for the handling of biocidal products and supervision over compliance with the requirements for the handling of biocidal products". Some uses of biocidal products are though exempted i.a. if used as "plant protection products within the meaning of the Plant Protection Act (RT I 2004, 32, 226)" (Art 1.2.1). Division 3 of this act concerns the "Use of Biocidal Products".

Articles 43 and 44 of the Act provide a qualifications scheme for users of biocidal products. Article 43 specifies that "[a] person who uses biocidal products intended to destroy, deter, render harmless, prevent the action of, or otherwise exert a controlling effect on any harmful organism by chemical or biological means (hereinafter pest control), has to use them only in the manner and under the conditions prescribed on the labelling and in the instructions for use of the biocidal products." The following requirements are outlined for a person to "engage in pest control". It is required that he:

- is registered in the register of economic activities and
- has a corresponding legal relationship with a specialist in charge specified in § 44 of this Act or the sole proprietor himself or herself is competent to act as a specialist in charge or
- is employed with an employer and holds a certificate of professional qualifications specified in subsection 44 (2) of this Act.

The article moreover specifies that "[t]he requirements for the pest control conducted by biocidal products shall be established by a regulation of the Minister of Social Affairs". This regulation is called "[t]he requirements for the pest control conducted by biocidal products". Information about quantities of biocidal produced, or used, is according to the questionnaire not collected by the authorities.

Finland

Information is supplied by the Finnish Environmental Institute (SYKE) and the National Product Control Agency for Welfare and Health (STTV), which are the competent authorities.

The questionnaire provides ambiguous information of certification requirements. According to the question 1, there is no regulation on the qualifications of users of biocidal products and no requirements for inspection of application

equipment. In contrast, the answer to question 4 states that "[t]he use of biocides (i.e. those which has a national authorization scheme in place already) is not allowed without authorization. Instructions for use are part of the authorization decision."

As regards restrictions on use, it is stated that biocidal products is prohibited for "Antifouling products in fresh water" and maximum leaching value for Cu from antifouling paints for pleasure boats. There "is though a general requirement to choose less harmful chemicals" and authorisation is required for the use of selected biocides. Authorities are attempting to promote the use of non-biocidal products in their communication.

Once a year retailers/distributors and producers provide STTV and SYKE with data on biocidal products, respectively on production, import/export and sales.

France

Information is supplied by the competent authority MEEDDAT. According to the questionnaire, there are no mandatory specific provisions in the law on the use phase of biocidal products that are implemented. There are mandate in the French environmental code, but a decree must be issued for it to be effectuated. Current provisions remain general provisions on the Work Code. There are voluntary standards for training and certification of professional users according to a NFU 43500 standard, certification on CTB A+ for professional users of work preservatives product PT 8.

There are also requirements to inspection of application equipment – a mandatory certification of equipment used for disinfection of places (defined in article L. 3114-1 of the French Public Health code), as well as a mandatory authorisation of equipments for potable water disinfection.

In regards to data collection, a decree must be elaborated in order for the provisions of the Environmental Code, requiring information to be supplied by companies upon request, to be effectuated.

Restrictions on the use of biocidal products are in addition to certain EC directives and regulations provided by PT 3 and PT 18 concerning use in regards to BSE and mosquito control following the national Health Code (L. 3114-5) There is ongoing work on the use of biocidal products with lower risk for mosquitoes control.

Concerning data on impacts of biocides use France has required data "for essential use derogation for Ammonia (veterinary hygiene disinfection) and temephos (insecticides for mosquitoes' control in overseas Departments)"

Germany

The competent authority, the Federal Institute for Occupational Safety and Health, has supplied the following information. Germany has legislation on biocides hereunder of the use phase. Concerning "activities involving biocidal products, it is necessary to proceed properly and in accordance with good expert practice (§9, Section 11 of the Hazardous Substances Ordinance)". Pest

control with very toxic, toxic or hazard substances are regulated by Technical Rule 523 and fumigation by Technical Rule 512.

For PT 14-19, there are requirements for the qualification of professional users of biocides in Germany for: "[a] controller must be able to furnish proof of expert knowledge (in accordance with the Hazardous Substances Ordinance III, No 4.4 and the Technical Rule 523)". There are mandatory qualification requirements as regards professional pest controllers; however no special qualification measures are required for the other users. In the case of fumigation, proof of expert knowledge must also be furnished. In addition, fumigation may only be performed with official permission (Hazardous Substances Ordinance, Annex III, No. 5.3 and Technical Rule 512).

In addition to this, there are specific requirements to PT 8 in regards to training-dependent occupations in the area of wood preservation and building protection (Ordinance on professional training in the wood preservation and building protection trade of 2nd May 2007), proof of expert knowledge in the area of wood preservation according to DIN 68 800, Part 4 (curative wood preservation), and concerning disinfectants (according to § 17, Section 2 of the Infection Protection Act., Technical Rule 522 and Technical Rule 513).

Inspection of application equipment is provided for "in the case of acts of disinfections or decontamination ordered by the authorities in accordance with §18 of the Infection Protection Act, only agents and equipment from a positive list may be used." Moreover the "Guidelines for the voluntary checking and control of equipment" provides for voluntary inspections.

In the area of disinfectants various guidelines apply (e.g. "Demands on the design, properties and operation of decentralized disinfectant dosing equipment"). Equipment used in plant protection must be examined for harmful effects (§ 24 and § 25 of the Plant Protection Act). This does not apply, however, to equipment that is used exclusively in the area related to biocides.

Cases where there are restrictions on the use of biocidal products in regards to i.a. water, fumigation, introduction and discharge of substances and waste.

Hungary

Information has been supplied by the Hungarian competent authority, the Office of the Chief Medical Officer of State. Hungary has existing legislation on the use phase of biocidal products in the following documents:

- 3/1969. (V. 16.) EÜM rendelet
- 18/1998. (VI. 3.) Népjóléti Minisztérium rendelete
- 38/2003.(VII. 7.) ESzCsM-FVM-KvVm eü rendelet 8. Melléklete
- 362/2006. (XII. 28.) Korm. Rendelet

For professional users of PT 14, 18 and 19 certification is mandatory. For non-professional users there is no such requirement. Certification is though mandatory for certain application equipment e.g. on placing out.

There is no available information on the quantities of biocidal products that are used, but 359 persons have been given valid authorisation for professional use. It is stated by the competent authority that a "significant part of the adult population" can be considered amateur users and that "in 2006 there were about 900 intoxication cases reported of the professional and non-professional use". The cost of these was not estimated.

Restrictions are though in place for the use of biocidal products e.g. in nature conservation areas. Also, it is required that the user is a minimum 18 years of age. It should also be noticed that the restrictions in general refer to a specific product and not a PT. Preference for lower risk products is encouraged in every area.

Lithuania

The State Environmental Health Authority, the competent authority, has supplied information following the request of the Commission. According to the answers to section 4 there is no current legislation on the use phase. However, "agreed labels and usage instructions are issued as an annexe to biocides authorisation certificates."

There are requirements for training and certification of professional users for PT 2, 14 and 18. Moreover, very toxic, toxic, CMR of category 1 and 2 are allowed to be used by authorised professional users only.

Luxembourg

Information is supplied by La Direction de la Santé, the competent authority. There is no legislation on use of biocidal products. There are however voluntary standards for professional users and the experience of the authority is that "even without training being mandatory, [...] a majority of professional pest controllers do possess training from authorities/institutions in neighbouring countries".

The Netherlands

For the Netherlands the Ministry ENVI is the competent authority and has responded to the Commission questionnaire. It states that the Dutch Law on Plant Protection Products and Biocides regulates the use phase of biocidal products.

Training and certification is required for PT 14 and 18, but there is no information in regards to other user groups. Inspection of application equipment is not regulated. With each authorisation a user instruction is provided detailing the areas of restriction

The information supplied by the competent authority is rather limited. Without consulting the legislation it is not possible to provide an overview of the main elements of the regulative setup on biocides.

Romania

The competent authority, Ministry of Public Health, has supplied answers to the Commission's questionnaire. On the use of biocides, Romania has "Methodo-

logical guides" issued by the Ministry of Health concerning insecticides and rodenticides.

Chemicals are by legislation categorised, and biocidals considered to be toxic or very toxic is only allowed used by professionals. Training and certification is required for professional users of biocidal products in PTs 14, 18 and 19 and there is a voluntary CE certification for application of equipment.

Data on biocidal products are collected by the National Agency for Dangerous Chemical Substances and Preparations on import/export volumes as well as sales, general use, professional use and non professional use. There is no data on the number of people involved in the use of biocides but incidents related to the use of these product was estimated to "126 days of hospitalisation for acute poisoning with pesticides registered in 2005, about 1300 € that means 10 € day"

Italy

Information is supplied by the Ministry of Health, which is the Italian competent authority. It is stated that existing legislation or guidance on the use phase of biocidal products is only constituted "by contracts for disinfestations, [and] the committent can monitor and control the biocides use (kind of products, way of distribution, etc.). The Italian competent authority have though elaborated "information on intoxications by biocides according to art 23 and art 24 if directive 98/8/EC"

There are voluntary qualification schemes only, for professional users, but no information is available as regards salers, retailers or other users. Moreover, inspections on application equipment are not in place. According to the information supplied by the competent authority "[t]he conditions of use depend on the characteristic of the single product. They are authorised and reported on the authorised label. In some cases (e.g. fumigants, rodenticides) there is a mandatory equipment to use." There is no data available on monitoring and reporting or on areas where biocidal product use is restricted. It is though clear that some products are authorised and used only by professionals and that there is a preference for lower risk products "especially in domestic and civil areas"

Malta

Malta Standards Authority has as the competent authority supplied information following the questionnaire disseminated by the Commission. The responsibility for biocidal products was transferred to the current unit only in 2008, and there are some data gaps following this reorganisation. Guidance on the use of biocidal products is under development.

In Malta training is required for both salers/retailers and professional users. For the latter group a national standard on IPM is furthermore being developed. Apart from this there is no information of any legislation or regulations regulating use of biocidal products.

The Slovak Republic

The Slovakian competent authority, Centre for Chemical Substances and Preparation, has supplied the following information.

Training requirements are in place for both salers/retailers and professional users and there is "a mandatory qualification scheme for professionals handling biocides", for Main groups 1 (Disinfectants and general biocidal products) and 3 (pest control). Professional users "are obliged to use biocides under accredited technological/operational schemes". These schemes also involve the "use and handling of specific application equipment for biocides". The accreditation of technological and operational schemes is mandatory.

Use of biocidal products is restricted in "environs of drinking water resources and public buildings". There is a preference to lower risk products when biocides are used in public buildings, where biocides use is undesired.

Slovenia

The competent authority, the National Chemicals Bureau under the Ministry of health, has provided information to the study. Existing legislation for professional users is: Rules on Correct Uses of Biocidal Products for Professional Users (OJ RS, No. 79/07). Used only for professional users who use BP as T+, T.

There is a voluntary qualification schemes for the usage of professional users "within Chamber of Commerce Association of DDD organizations mainly for PT1-5, 14, 18-19 works". There are no requirements to application equipment and there is no data on this. Data is neither supplied on Monitoring and reporting, but according to the competent authority data on the quantity of biocidal products is collected each year from producers, retailers and professional users of T, T+ and CMR 1 and 2 Group (Rules on reporting and keeping of register of biocidal products (OJ RS, No. 73/07)).

Use of biocides is restricted from PT 5 if there are risk for certain users. Use is also restricted for some uses where the product is regarded toxic or very toxic, or carcinogenic category 1 and 2, mutagenic category 1 or 2 or toxic for reproduction category 1 or 2. These products "shall not be put on the market for general use." Preference for lower risk products is actively promoted, e.g. through advertisement.

Spain

The Ministry of Health and Consumer Affaires is the competent authority and according to the supplied information, there are legal requirements for sale, storage and professional use activities.

The use of "toxic and very toxic products require special qualification". A movement register book for toxic and very toxic is required for sale, storage and use activities, and each biocidal product is "authorized for a specific use. "Training and certification is required for professional users of TP 2, 4, 14, 18 and 19 as well as for TP11, in open cooling systems. There is however no requirements concerning the application equipment except for "requirements related with pressurized and electrical devices, and some voluntary certifications

for pesticides application equipments." Whether these requirements include inspection is not clear.

Data is collected on volumes of biocidal products as regards imports and exports of Insecticides, Disinfectants and Rodenticides. Data is collected from customs authorities and the National Association of pest control agencies. In 2003, 4500 workers used biocidal products professionally according to the Confederation of European Pest Control Association.

It is under local competence to regulate areas of restriction of use and this is not informed about in the current questionnaires. It is though stated that some local communities promote the use of low toxicity products. This is subsidised by the government.

Sweden

The Swedish Chemicals Agency (KEMI) is the competent authority in Sweden and the agency states in the questionnaire that "[t]he use phase [of biocidal products] may be regulated by the use of specific provisions in the authorization."

For professional users there are requirements concerning the use of certain substances, rodenticides (PT 14), wood preservatives (PT 8) and insecticides (part of PT 18) and training is part of a specific provision in the authorization. There is no inspection of application requirements required by KEMI, as this is not under the agency's competence. Retailers need a certificate to sell products with certain hazardous properties and it is the retailers' responsibility to ensure that a buyer has the required qualifications.

Biocides use is restricted to the extent to which it falls under the national legislation on health of workers at work and PPE is only allowed used by professional users as to protect the non professional user. In regards to the use of lower risk products it is stated that "here is a possibility in the previous Swedish legislation to apply substitution, PT 21 and 12". There are moreover monitoring programs for "certain active substances".

United Kingdom

Information is supplied by the competent authority for biocides, the governmental organisation Health and Safety Executive. Legislation is in place on some biocidal products and is regulated by the Control of Pesticides Regulations 1986.

There are voluntary qualification requirements for professional usage of some substances in PTs 8, 14, and 18 that the Executive is aware of, indicating that these schemes are not public initiatives. There is not collected data on impacts in by the authorities.

According to the supplied information, the use of biocidal products may be restricted e.g. on indoor/outdoor use or restrictions concerning non-professional users, but no further information is supplied on this. There is though a preference for usage of lower risk substances according to the "non professional use

and in the UK, Health and Safety Legislation has a system of substitution of harmful substances for less harmful ones".

2. Overview of other main responses

The questionnaire contains seven main categories of questions. Overviews of most important responses within each category, besides legislation, are presented below.

1. Training of certification of users

	Major difficulties and advantages of a Commission encouraged scheme	Other
Belgium	<p>Clear advantage in relation with the protection of the health (users and public) and environment (information on the hazards and risk within the education, storage, PPE, first aid,...)</p> <p>Multiplication of different training schemes units (by PT) and costs for admin and inter-institutions share of responsibilities and data</p> <p>Costs for admin and business partners</p>	
Bulgaria	-	
Cyprus	Major difficulties will be the identification of the amateur users of biocides, the lack of staff to develop these training tools. The advantages would be the safe use of biocides in every MS with respect to the Public Health and the environment.	The economic cost would be the permanent position of two officers in the Department that will be responsible for the evaluation of the biocides and the market control.
Czech Rep.	-	
Denmark	- (???)	
Estonia	<p>In Estonia Disinfection and Pest Control Association http://www.kahjur.ee/ usually organise such kind of trainings also took part in the development of mentioned professional Standards and take also part in qualification work.</p> <p>It will be very helpful for all Member States if the Commission will encourage the development of such kind of unified training scheme.</p> <p>This requirement for qualification for pest control professionals has to be legally binding.</p>	<p>Yes, mandatory qualification scheme.</p> <p>To pass the training and to achieve the qualification certificate the person, who apply for this qualification have to pay himself, or if the pest control company is very interested in this worker, the company may pay for him.</p>
Finland	<p>Difficulties; lack of resource at CA to organize training/act as trainers. Due to many PTs and types of uses the users are difficult to reach.</p> <p>Advantages: more safe (users, environment, man exposed via environment) and controlled use of biocides. Better possibilities to restrict use e.g. for professional use only.</p>	
France	<p>Major difficulties:</p> <ul style="list-style-type: none"> - to define what is a "professional user", sellers/retailers - to develop such scheme requires to have a high knowledge of the specificities of each biocidal use, and a high knowledge of the current practices. Most biocidal products are not under authorisation scheme until active substances are included. Need to have a prioritization. 	<p>No mandatory qualification schemes for sellers/retailers, but legal provisions are provided.</p> <p>Mandatory qualification schemes for professional users.</p>

	<p>- resources to develop such schemes (human and financial)</p> <p>Advantages:</p> <ul style="list-style-type: none"> - Reduction of risks of health, environment - Better use of biocidal products - One step on the management of the development of resistances. 	
Germany	<p>Advantages:</p> <p>Less risk of resistance developing; more effective selection and application; safer handling of hazardous substances</p> <p>Problems:</p> <p>It is necessary for various training schemes to be devised: for hygiene experts in food processing companies, fumigation in pest control / the protection of stock / the transportation of goods, safe handling of wood preservatives etc.</p>	Yes, mandatory qualification scheme.
Greece	-	
Hungary	<p>The risk that arises from the variety of the product types and active substances is wide and it's difficult to develop one general scheme for all areas.</p> <p>The training for non-professional users cannot be made compulsory.</p>	Yes, mandatory certification for professional users.
Ireland	-	
Italy	<p>Major difficulties: Lacking communication between Central Authority, Local Authorities and private subjects as users. Different kinds of users and products (e.g. formulations).</p> <p>Advantages: Reduction of operator exposure and of number of poisonings. Control on the amount of sprayed active substance and reduced environmental impact.</p>	There are only voluntary qualification schemes, in particular for some uses.
Latvia	-	
Lithuania	<p>Big costs for enforcement authorities and users.</p> <p>Advantages may be better protection of health and the environment, right choice of biocidal products by users, reduced resistance to biocides and implemented best known use practice.</p>	Yes, mandatory schemes for professional users, mostly for PT 2, 14 and 18.
Luxembourg	<p>We would welcome a harmonized training scheme, which would also take into account already existing qualifications (obtained by (academic) education; experience), as long as this training could be offered in cooperation with competent bodies in neighbouring MS (LU would have to offer training in the 3 official languages - the number of attendees would probably not outweigh the organisational costs).</p> <p>Training for products limited upon authorisation to "professional" and "industrial" users could, at least partially, be provided by industry. This could be considered an integral part of the product package, and would allow a quick way to react to situations arising from new or extended uses or new findings concerning the use. Yet training as a prerequisite for access to products with limited users categories ("for trained users only", which would then turn amateurs into professionals?) should</p>	Voluntary. For professional users: Even without training being mandatory, our experience is that a majority of professional pest controllers do possess training from authorities/institutions in neighbouring countries.

	not apply to amateurs, as products could still be passed on to untrained amateurs.	
Malta	Judging from our experience the major problem would be that of ensuring that all those subject to such a requirement actually do participate in the training. The advantage would be that you would have a minimum basic level of knowledge.	Mandatory/voluntary qualification schemes: Sellers/retailers: Yes - training Professional users: Yes - training. A national standard on integrated pest management is being developed
Netherlands	No difficulties foreseen. 😊	Mandatory/voluntary qualification schemes: Professional users: PT 14 & 18
Poland	-	
Portugal	-	
Romania	Advantages: safety use for professionals Difficulties: lack of interest in case of voluntary training system.	Mandatory training and certification for professional users of biocidal products included in PT 14, PT 18, PT19.
Slovakia	Advantage: Harmonised and transparent qualification and training scheme in all EU MS. Difficulties: Expected in transitional period between national and the EU qualification schemes.	Yes, qualification schemes for sellers/retailers. Yes, mandatory qualification scheme for professionals. Costs: The fees and requirements for training courses for professionals handling biocides will considerably increase in the first years after coming in force the harmonised training scheme.
Slovenia	Possible difficulties: Additional limitation for professional users, additional costs, need to rise institutional capacity, preparation of additional regulation, guidelines, issuing of permits. Advantages: additional knowledge, specialization, awareness raising, less incorrectness, less environmental and health problems	Yes, mandatory qualification schemes for sellers/retailers and professional users.
Spain	We should adapt our legislation to the new requirements, if necessary.	Yes, mandatory qualification schemes for professional users.
Sweden	We don't see any major problems. This would probably facilitate a harmonized approach among MS.	Yes, mandatory qualification schemes for professional users: Rodenticides, wood preservatives and insecticides, training is part of a specific provision in the authorization
UK	(-) Too many different areas involved with biocides to have one training scheme, there is a lack of knowledge and experience with the industry, lack of money, lack of resources – trainers, examiners, and assessors. Increased costs to industry (+) Harmonised approach across the EU??	Only mandatory schemes for professionals. Contacts listed. A scheme would be very costly. Difficult to say, but we guess around 500 Euros per day for an individual to attend a training /certification event in the UK.

2. Inspection of application equipment

	Major difficulties and advantages of a Commission encouraged scheme	Other
Austria	Missing	
Belgium	Must be developed through normalisation, but many different ways of application. PT (project on the way *).	
Cyprus	Major difficulties will be the identification of the amateur users of biocides, the lack of staff to develop these training tools. The advantages would be the safe use of biocides in every MS with respect to the Public Health and the environment.	The economic cost would be a permanent position in the Department that would cost.
Czech Rep.	-	
Denmark	-	
Estonia	If yes, then this requirement for application equipment inspection has to be legally binding.	
Finland	-	
France	<p>Major difficulties:</p> <ul style="list-style-type: none"> - to develop such scheme requires a high knowledge of the specificities of each biocidal use, and a high knowledge of the current practices. Most biocidal products are not under authorisation scheme until active substances are included. Need to have a prioritization - other issues than the sole risks linked to chemical products: efficiency of the equipment, security of the equipment, care and maintenance.... - resources to develop such schemes (human and financial) <p>Advantages:</p> <ul style="list-style-type: none"> - Reduction of risks of health, environment - Better use of biocidal products - One step on the management of the development of resistances - Full equipments generating biocidal active substances would have similar requirements as "basic" biocidal products 	Yes, mandatory certification of equipments. *
Germany	The extent to which advantages might result from checking equipment is a question that must be answered with specific reference to the particular product and application. Especially in cases where the quantity that is to be applied is not easy to control and exposure is likely, it appears sensible to ensure the optimal concentration of active substance, the targeted and safe (low-risk) application as well as the control of the form (e.g. the optimal droplet size) by placing precise demands on the utilized equipment.	Yes, some regulation exists. **
Greece	-	
Hungary	It would be difficult to develop a standard inspection system since in practice the application equipment is different for each product.	There is a mandatory certification for certain application equipment e.g. for spraying and dispersing machines and the bait boxes. (the instructions for the shape of the bait box, labelling and placing out are

		mandatory) The inspectors can volunteer for a training, which involves the use of the application equipments.
Ireland	-	
Italy	Major difficulties: to perform controls on the application of biocides at local level. Advantages: reduction of operator exposure.	No. The conditions of use depend on the characteristic of the single product. They are authorised and reported on the authorised label. In some cases (e.g. fumigants, rodenticides) there is a mandatory equipment to use.
Latvia	-	
Lithuania	Big costs for enforcement authorities and users. Advantages may be better protection of health and the environment, right choice of biocidal products by users, reduced resistance to biocides and implemented best known use practice.	
Luxembourg	It is anticipated, that such inspections would be very time-consuming due to the various areas biocides are used in. As "application equipment" can (supposedly) also be purchased by amateurs, where/at which point in time should this inspection be performed? We doubt that this concept really applies to biocides - or are treated articles concerned?	
Malta	Such a system will be introduced for PPP and we are envisaging that a significant amount of resources will be necessary to implement such a requirement. Moreover a register of equipment will need to be developed. Another problem could be avoided by having a clear scope to which requirement it would apply.	Please indicate costs: "Very high".
Netherlands	No problems foreseen.	
Poland	-	
Portugal	-	
Romania	Advantages: standardized inspection Difficulties: insufficient qualified personnel for inspection	Voluntary CE certification.
Slovakia	Advantage: Harmonised and transparent requirements in all EU MS. Difficulties: Increased costs during transitional period.	The professional users are obliged to use biocides under accredited technological/operational schemes. These schemes also involve the use and handling of specific application equipment for biocides. The accreditation of technological/operational schemes is mandatory. The administrative bodies responsible for approval of technological/operational schemes are stipulated in the Act No Act No355/2007. Coll. On the Public Health.
Slovenia	Difficulties: Monitoring of proper use (Where?), problem of inspection of different types of equipment and for different applications.	Some reporting data.*
Spain	-	No for specific biocide application equipment. Only requirements related with pres-

		surized and electrical devices, and some voluntary certifications for pesticides application equipments.
Sweden	We don't see any major problems. This would probably facilitate a harmonized approach among MS.	Not that falls under Keml's (Swedish Chemicals Agency) management.
UK	- ve - Conflict with existing legislation/systems, lack of knowledge, experience, time consuming, lack of resources. Increased costs to industry +ve - Harmonised approach across the EU ??	In the UK there is legislation covering the use of equipment in the workplace.* Please indicate costs: Extensive!

3. Monitoring and reporting

	Major difficulties and advantages of a Commission encouraged scheme	Other
Austria	Missing	
Belgium	Difficulties : costs if the public authorities have to do those studies, difficult to control if the industry do it Advantages : Better view and understanding of the use	Very difficult to estimate costs.
Bulgaria	Missing	
Cyprus	The main difficulty would be the lack of staff to work with this field of data collection. The advantage would be the improvement of the knowledge of the biocides in the market	The economic and social cost would be the incorporation of the statistical services and the inclusion of the biocide within their annual surveys. Through the tariff (?) codes of the custom services there is no distinction for the biocides and this is a major problem for the collection of data, either for the production or the sales of these products
Czech Rep.	Missing	
Denmark	Missing	
Estonia	If yes, then this requirement has to be legally binding.	
Finland	Difficulties: To make companies answer to questionnaire.	
France	Major difficulties: - to develop such scheme requires a high knowledge of the specificities of each biocidal use and a high knowledge of the current practices. Most biocidal products are not under authorisation scheme until active substances are included. Need to have a prioritization - and resources to develop such schemes (human and financial) Advantages: - Reduction of risks of health, environment - Better use of biocidal products - One step on the management of the development of resistances.	
Germany	Advantage: The exposure / health / environmental ex-	

	posure / economic gain is quantifiable	
Greece	Missing	
Hungary	It would be difficult to involve the traders in monitoring the use of the biocidal products. The increased burden of administrative work would discourage the small retailers from trading.	
Ireland	Missing	
Italy	Major difficulties: It doesn't seem possible to monitor non-professional uses and it is also difficult to control professional uses. Advantages: Much information about uses of biocides would be granted by a systematic collection of data, which should be encouraged.	
Latvia	Missing	
Lithuania	Big costs for enforcement authorities and users. Advantages may be better protection of health and the environment, right choice of biocidal products by users, reduced resistance to biocides, and implemented best known use practice.	
Luxembourg	Very difficult to implement in near or even intermediate future, in particular in relation to the amounts used by non-prof. users.	
Malta	Major difficulty: Resource requirements.	Costs expected to be medium-high.
Netherlands	No difficulties foreseen.	
Poland	Missing	
Portugal	Missing	
Romania	Insufficient personnel. Costs related on monitoring programs.	
Slovakia	Advantage: Coherent, transparent and reliable data on the use of biocides in EU MS Difficulties: Lack of human resources, limited finances in MS	
Slovenia	Difficulties: additional administrative work (collecting, processing, analysis,..) on national and EU level, additional obligations.	
Spain	-	
Sweden	-	
UK	-ve: Lack of knowledge, experience, time consuming, lack of resources, increased costs to industry +ve: The UK is not clear about the purpose of gathering this information – what will it be used for?	

4. General data

	Is there any existing legislation or guidance on the use phase of biocidal products?	Other
Austria	Missing	-
Belgium	The use is, in principle, regulated through the mode of application, frequency, advices, specifications ... of the authorisation acts.	-
Bulgaria	Missing	-
Cyprus	Yes, there is the national legislation for biocides which is fully harmonised with the EU directive 98/8.	-
Czech Rep.	Missing	-
Denmark	Missing	-
Estonia	Division 3 of Biocides Act "Use of Biocidal Products". In Estonia pest control is regulated according to Biocides Act § 43, "Organisation of pest control". Also it is established in the regulation of the Minister of Social Affairs, "The requirements for the pest control conducted by biocidal products".	-
Finland	In the Chemicals legislation there is a general requirement to choose less harmful chemicals. The use of biocides (i.e. those which has a national authorization scheme in place already) is not allowed without authorization. Instructions for use are part of the authorization decision.	-
France	- No mandatory specific provisions in the law, it remains on the general provisions on the Work Code. - Opinions given by some health or environmental risk national agencies - Some guidance: - NFU 43500 standard (certification) on the good practices of use of plant protection products or biocidal products, for professional users - CTB A+ certification on professional users of wood preservatives, product PT08. This standard is applied by companies on a voluntary basis and given by FCBA.*	-
Germany	In the case of activities involving biocidal products, it is necessary to proceed properly and in accordance with good expert practice (§9, Section 11 of the Hazardous Substances Ordinance). A corresponding guideline is under consideration. Pest control with very toxic, toxic or hazard substances: Technical Rule 523. Fumigation: Technical Rule 512	-
Greece	Missing	-
Hungary	Yes. Hungarian references, *.	-
Ireland	Missing	-
Italy	No. Only by contracts for disinfestations, the commitment can monitor and control the biocides use (kind of products, way of distributions, etc.).	-
Latvia	Missing	-
Lithuania	No. Agreed labels and usage instructions are issued as annexes to biocides authorisation certificated.	-
Luxembourg	No. (Under the PPP legislation there is a system of authorized users/vendors).	-
Malta	This guidance is being developed.	-

Netherlands	Yes, the Dutch Law on Plant Protection Products and Biocides. See link*	-
Poland	Missing	-
Portugal	Missing	-
Romania	For use of insecticides and rodenticides: Methodological guides issued by Ministry of Health.	-
Slovakia	No.	-
Slovenia	No.	-
Spain	There are legal requirements for sale, storage and professional use activities. Link *.	-
Sweden	The use phase may be regulated by the use of specific provisions in the authorisation.	-
UK	The UK has an existing scheme in place that covers the use of some biocidal products. The Control of Pesticides Regulation 1986. Link *.	-

5. Restriction on use of biocidal products

	Areas with restrictions on the use of biocidal products	Areas where lower risk products are encouraged
Austria	<i>Missing</i>	
Belgium	Not on a global or spatial basis (but through the specifications of the authorisation acts). For example, only via professional use. Conditions of use are specified in the authorisation acts.	Must be developed.
Bulgaria	<i>Missing</i>	
Cyprus	No	Common practice in private areas in the house.
Czech Rep.	<i>Missing</i>	
Denmark	<i>Missing</i>	
Estonia	The biocides and their types, registered in Estonian Chemicals Notification Centre are available on the web page www.ktk.ee. Restrictions are also regulated by the directive 76/769 (e.g. Wood preservatives).	Biocides Act Division 2 Placing on Market of Biocidal Products § 37. Requirements for placing on market of biocidal products (3) Retail trade in a biocidal product classified pursuant to the Chemicals Act as toxic, very toxic or as a category 1 or 2 carcinogen, or as a category 1 or 2 mutagen, or classified as toxic for reproduction category 1 or 2, is prohibited.
Finland	Antifouling products in fresh water prohibited, maximum leaching. Value for Cu from antifouling paints for pleasure boats.	

France	<ul style="list-style-type: none"> - Directive 76/769/CE on limitations and restrictions : PT8, Use of creoste, CCA in wood preservatives products or treated wood Regulation EC No 782/2003 on the prohibition of organotin compounds on ships : PT21 - PT3: The use of disinfectants products used in case of BSE or contagious animal diseases is regulated in France. - PT18: The use of insecticides for the control of mosquitoes in France, for "comfort" purposes or in case of epidemic of diseases (chikungunya, dengue, malaria...), is regulated in France (article L.3114-5 of French Health Code, and Law of 13 August 2004). <p>On some pest control areas, France had to require for essential use derogation for Ammonia (veterinary hygiene disinfection) and temephos (insecticides for mosquitoes' control in overseas Departments).</p>	<p>Please define what a "lower risk product" is. Is this a "Low Risk product" in the sense of directive 98/8/EC?</p> <p>Work is on-going concerning use of biocidal products for mosquitoes' control, with lower risk. Some opinions from AFSSET are available *</p>
Germany	<ul style="list-style-type: none"> - In the case of acts of disinfestation or decontamination ordered by the authorities in accordance with §18 of the Infection Protection Act, only agents and equipment from a positive list may be used. Measures to combat these problems must be taken by experts (§ 17 of the Infection Protection Act). - In Germany, agents that act against fish, birds and other vertebrates (PT 15, 17 and 23) are prohibited (Biocide Authorisation Ordinance §4) - General requirements when undertaking fumigation (Technical Rule 512 and Technical Rule 513). - For the avoidance of harmful environmental effects: In designated nature and landscape conservation areas (according to the Federal Nature Conservation Act) and water protection zones (according to § 19 of the Water Resources Policy Act), the use of plant protection products and biocides is restricted. Exemptions may only be granted by the regional Competent Authorities. - The introduction and discharge of substances and waste water into aquatic environments is regulated by the Water Resources Policy Act. - In the case of plant requiring authorization, emission limits for the release to the atmosphere as a result of the use of substances (e.g. fumigants) are laid down in the Federal Immission Control Act and the Technical Instructions on Air Quality Control. - In the area relating to the treatment of drinking water (in implementation of Art. 7 of EC Directive 98/83 on the quality of water intended for human consumption), it is only permitted to use agents and processes that are listed according to § 11 of the Drinking Water Ordinance and must there fulfil special demands. A national expert commission offers advice on questions concerning drinking-water hygiene and issues recommendations in this regard. - The quality criteria according to § 37, Section 2 of the Infection Protection Act apply in the area relating to the treatment of swimming and bathing pool water in public baths, business enterprises and other establishments that are not exclusively privately used. A national expert commission belonging to the Fed- 	<p>From an environmental point of view, regional demands, e.g. in conservation areas, would be conceivable or in the case of use by private consumers.</p> <p>The trade must keep products labelled with T and Xn/R40 in locked cupboards and must only hand the products over after providing advice (ban on self-service, Prohibition of Chemicals Ordinance). Restrictions on use by private consumers should be considered. Use should possibly be limited to professional users in possession of proof of expert knowledge (see above).</p>

	eral Ministry of Health which offers advice on questions concerning swimming and bathing pool hygiene and issues recommendations in this regard. The water-quality targets, the technical requirements needed for adherence to them as well as the utilizable treatment chemicals and disinfectants are contained in DIN 19643 and other technical standards.	
Greece	<i>Missing</i>	
Hungary	In e.g. nature conservation areas the use of some biocidal products is restricted. All biocidal products can be used only by adults (older than 18). The restrictions usually refer to specified products and not to product types or areas. Possible restriction is through the marketing: in case of professional use the products can be sold only to the qualified person, in case of other biocides only to adults.	The lower risk products are in every area preferred and encouraged.
Ireland	<i>Missing</i>	
Italy	Data not available (<i>sært.</i>) Some products are authorised and used only by professional users.	Yes, there are, especially in domestic and civil areas.
Latvia	<i>Missing</i>	
Lithuania	Very toxic, toxic, CMR of category 1 and 2 are authorised only for professional users. All restrictions are written in authorisation certificate and obligatory repeated in product label; market surveillance and control institutions (including Labour Inspection) are informed about them. The biocide legislation is the transposition of the directive. As such, restrictions on the use phase could only be implemented after the end of the transitional period.	Yes, for PT1, 2, 18 and 19, especially when they are for general public use.
Luxembourg	No.	
Malta	No. Through consultation and a positive impact assessment.	
Netherlands	geographical: no With each authorisation, a user instruction is provided, detailing the area of restriction	
Poland	<i>Missing</i>	
Portugal	<i>Missing</i>	
Romania	Regarding on chemicals legislation in force: biocidal products classified as toxic and very toxic - only for professionals. Labeling; IEC means.	There are methodological norms for the safety of the general public: recreational areas, schools or hospitals, elderly and children.
Slovakia	YES in environs of drinking water resources, public buildings (e.g. schools, kinder garden, etc.).	YES: public buildings (e.g. schools, kinder garden, where the use of specific biocides. (Main Group 3) is undesired or should be minimised).
Slovenia	Yes. Use of biocidal product for PT 5 is restricted if there is risk for certain users (NCB makes for PT5 risk assessment).	Preference of lower risk products is encouraged through advertisements, awareness raising activi-

	<p>On the basis of BPD biocidal products, classified on the basis of dangerous properties and in accordance with the rules governing chemicals classification as: very toxic, toxic, carcinogenic category 1 and 2, mutagenic category 1 or 2 or toxic for reproduction category 1 or 2 shall not be put on the market for general use.</p> <p>Concerned area: control of label</p> <p>How is the restriction dealt with?: More positive than negative.</p>	<p>ties like week of Chemical Safety. It goes for presentations where CPL issues are explained, safe and correct usage of biocidal products is encouraged, resistance to certain pests is explained...</p>
Spain	<p>That question is under local regulation.</p> <p>The use of toxic and very toxic products requires special qualification.</p> <p>A toxic and very toxic movement register book is required for sale, storage and use activities.</p> <p>Each biocidal product is authorized for a specific use.</p>	<p>Some local communities promote the use of low toxicity products, by means of government subsidies</p>
Sweden	<p>To a certain extent it falls under detailed national legislation on health of workers at work.</p> <p>Products which require the use of PPE are not authorized for non-professional use in order to protect the user.</p> <p>The retailer of the product has the possibility to control that the buyer has a mandatory certificate.</p> <p>A retailer needs a permit in order to sell products with certain hazardous properties.</p>	<p>There is a possibility in the previous Swedish legislation to apply substitution. PT 21 and 12</p>
UK	<p>Yes – some products may be restricted to a particular application method; may be used indoors only or restricted to industrial or professional users.</p> <p>The UK puts legal restrictions on who can and cannot use a particular product through its regulatory system.</p>	<p>Yes – for non professional use and in the UK, Health and Safety Legislation has a system of substitution of harmful substances for less harmful ones. *</p>

6. Transposition of IPM

	IPM guidelines for PPP feasible? If yes, what notions would be contained?	Major difficulties and advantages of a Commission encouraged scheme
Austria	<i>Missing</i>	
Belgium	<p>Must be detailed.</p> <p>Prevention - yes pest monitoring - yes use of thresholds - yes lowest use of chemicals - adequate use (via monitoring) use of substitutes (e.g. mechanical) - insects in the house, wasps, ants.</p>	Harmonise>different situations
Bulgaria	<i>Missing</i>	
Cyprus	<p>Yes this approach will help the better risk analysis before the use of a biocide. It is better to identify the exact problem and then to proceed with the control of the problem as signs of resistances are already shown due to the use of biocides.</p>	<p>The main difficulty would be the lack of staff to work with this field of data collection. The advantage would be the improvement of the</p>

	Prevention: yes pest monitoring: yes use of thresholds: yes lowest use of chemicals: yes use of substitutes (e.g. mechanical): yes	safer and better use of biocides in the market.
Czech Rep.	<i>Missing</i>	
Denmark	<i>Missing</i>	
Estonia	Yes. Prevention: yes pest monitoring: yes use of thresholds: yes lowest use of chemicals: yes use of substitutes (e.g. mechanical): yes	Guidelines are not legally binding - it is the major difficulty. In Estonia pest control is regulated according to Biocides Act § 43. "Organisation of pest control". Also it is established in the regulation of the Minister of Social Affairs "The requirements for the pest control conducted by biocidal products". But to have the unified approach for IPM in all MS is very important.
Finland	We have not studied this in detail but at least for some product types it would be desirable (e.g. professional users of rodenticides and other biocides against vertebrate animals, professional users of insecticides, disinfectors in food and feed areas). Prevention: General hygiene (PT 14, 18, 19) Pest monitoring: especially PT 18 and 19 use of thresholds: ? lowest use of chemicals: proper use instruction for consumers/use instructions use of substitutes: non-biocidal products (PT 21) or methods (PT 8)	Cooperation between multiple user groups, instructors and authorities.
France	The principles are interesting, but their application for biocidal needs further analysis. Each PT has its own specificities. There is a need for prioritisation.	Difficulties: - compared to PP products, a lot of biocidal products are put on the market for non professional users. Principles similar to IMP for biocidal products may be more difficult to implement. - most of biocidal products are still not under an authorization system, since active substances are still not included in annexes of directive 98/8/EC : a lot of work remain to do to fully implement the actual directive 98/8/EC Advantages: - Reduction of risks of health, environment - Better use of biocidal products - One step on the management of the development of resistances.
Germany	Only in a general view to the measures for the minimization of use of biocides. IPM has to distinguish between different product types and different uses. In principle, there exist only a few alternatives in the area of biocides, and therefore the main area has to be measures for the avoidance or the minimization of the	• Consideration of the release into the environment due to various types of use, e.g. as a plant protection product, biocide, building material or resulting from treated

	<p>use of biocides and the sufficient information of the public. The “Feasibility Study on the Support of the Information Requirement in Compliance with §22 ChemG on Alternative Measures for the Minimization of the Use of Biocides” (see Annex II) is a documentation of available non-biocidal alternatives in the various branches and product types, alternative and integrated measures for the minimization of use of biocides as well as the state of technology. This information can serve as a good basis for the elaboration of product / branch-related guidelines for IPM or for determining more precisely use according to good expert practice (see Annex I). Implementation of the results is currently under discussion.</p> <p>In addition, a research project for 2008 entitled “Thematic Strategy for Sustainable Use of Pesticides – possibilities and preconditions for transfer to biocides” is planned. An important building block in the development of IPM is the promotion of low-risk or non-biocidal alternatives. The assignment of eco-labels and the development of new ones for the label claim of environmentally friendly agents and processes is an important instrument here in creating an incentive for the marketing and use of environmentally friendly products. For example, a research project for the purpose of developing new labels in the area relating to antifouling products was conducted (see Annex III). To date, however, no company has registered its interest in such an eco-label. However, the topic can be taken up again at any time if interest is expressed.</p> <p>Further relevant research projects relating to the topic of IPM:</p> <ul style="list-style-type: none"> • “Use of environmentally acceptable chemicals in the conditioning of cooling water”. • “Elaboration of guidelines for integrated pest control in the non-agricultural area (apart from wood preservatives)” (see Annex V). ” 	<p>materials).</p> <ul style="list-style-type: none"> • Regulation of the use of treated materials. • Promotion of alternatives and precautionary measures. • Promotion of the establishment of expert training courses and expert knowledge for users in the Member States. • Exoneration of non-concerned natural substances.”
Greece	<i>Missing</i>	
Hungary	<p>e.g. in nature conservation areas the use of some biocidal products is restricted.</p> <p>All biocidal products can be used only by adults (older than 18).</p> <p>The restrictions usually refer to specified products and not to product types or areas.</p> <p>The lower risk products are in every area preferred and encouraged.</p>	<p>Possible restriction is through the marketing: in case of professional use the products can be sold only to the qualified person, in case of other biocides only to adults.</p>
Ireland	<i>Missing</i>	
Italy	<p>In some cases it's possible to consider IPM guidelines for PPPs also feasible for biocides, like use of non conventional products (Bacillus, pheromones) or rotation of insecticides to avoid resistance cases.</p> <p>Yes.</p> <p>Prevention: yes pest monitoring: yes use of thresholds: yes lowest use of chemicals: yes use of substitutes (e.g. mechanical): yes</p>	<p>Major difficulties: It seems difficult to organise technically local territories and inform all the users of biocides, considering the different products and types of users. The Commission should find legal tools (as recommendations) to facilitate IPM principles.</p> <p>Advantages: Harmonised guidelines for IPM could facilitate mutual recognition. IPM principles could grant simplified authorisation procedures.</p>

Latvia	<i>Missing</i>	
Lithuania	May be, but biocides use areas are very different from PPP.	No view for now.
Luxembourg	An array of complementary methods could apply to biocides in main group 3, but only to a much lesser extent to other groups. Prevention: yes Pest monitoring Use of thresholds lowest use of chemicals use of substitutes (e.g. mechanical): yes	-
Malta	Yes.	Similar resources would be the main issue.
Netherlands	No without transforming it. Prevention: yes pest monitoring: yes use of thresholds: yes lowest use of chemicals: yes use of substitutes (e.g. mechanical): yes	No difficulties foreseen.
Poland	<i>Missing</i>	
Portugal	<i>Missing</i>	
Romania	Yes. PT 18 - for mosquito control: integration of biological means with chemical ones. PT 18 - for mosquitoes control: integration of biological means with chemical ones prevention pest monitoring use of thresholds: PT 18 lowest use of chemicals: multi-target active substances use of substitutes (e.g. mechanical): PT 14.	Difficulties: costs for implementation, according to the harmonized guidelines for zonal conditions. Advantages: health /safety and environment issues (minimum residues, respectively waste)
Slovakia	Yes for specific PTs prevention: PTs 1-5 pest monitoring: PTs 14,15, 17, 18 use of thresholds: lowest use of chemicals: use of substitutes (e.g. mechanical) :	Advantage: Harmonised use and improved consumers' health protection of biocides in EU MS. Difficulties: Lack of human resources, limited finances.
Slovenia	Not studied yet at the national level. Joint elements should be identified.	Difficulties: not easy preparation, questionable clearness of guidelines Advantage: prevention of human health and environment
Spain	Yes. prevention: Yes, for TP 14,18 pest monitoring: Yes, for TP 14,18 use of thresholds: Yes, for TP 14,18 lowest use of chemicals: Yes, for TP 14,18 use of substitutes (e.g. mechanical)	
Sweden	Possibly.	We don't see any major problems.

	Scale 1-5 (1 is most important): prevention: 3 pest monitoring: 5 use of thresholds: 4 lowest use of chemicals: 2 use of substitutes (e.g. mechanical): 1	This would probably facilitate a harmonized approach among MS. Voluntary actions need to be funded in some way and up to date.
UK	There may be some areas where the principles may be appropriate – more information gathering is required.	-ve - Lack of knowledge, experience, time consuming, lack of resources, increased costs to industry +ve - Harmonised approach across the EU

7. Additional measures

	Other measures to reduce risk
Austria	<i>Missing</i>
Belgium	Clarify some situations through an on-going adaptation of the MoD. Study the socio-economic impacts at the EU levels with consultants, industry, NGO with the help of the available information (let's say for 2010)
Bulgaria	<i>Missing</i>
Cyprus	The information to the society and the public about the risks of using such product in the house, the knowledge of the side or unwanted effects due to the use of these products and the necessity to incorporate professionals in cases where biocides need to be applied.
Czech Rep.	<i>Missing</i>
Denmark	<i>Missing</i>
Estonia	-
Finland	Specific provisions given in the active substance Annex I directives should be detailed enough to ensure adequate level of protection. Harmonized product evaluations.
France	Work on the LMR issues (associating the biocide uses, the VMP uses and PPP uses of an active substances) - Harmonization of poisoning control systems for human as well as for animals, and bio-monitoring, to allow some exchanges and comparisons at EU level - Work on the mixture of biocidal products, if this is an issue - Work on the cumulative uses of biocidal products with or without the same active substance - Work on the management of resistance - Work on Emission Scenario Documents for "orphan" Product Types that may help to better know the uses and harmonize them.
Germany	<ul style="list-style-type: none"> • Consideration of the release into the environment due to various types of use, e.g. as a plant protection product, biocide, building material or resulting from treated materials). • Regulation of the use of treated materials. • Promotion of alternatives and precautionary measures. • Promotion of the establishment of expert training courses and expert knowledge for users in the Member States.

	• Exoneration of non-concerned natural substances.
Greece	<i>Missing</i>
Hungary	No.
Ireland	<i>Missing</i>
Italy	Proposed measures: Promoting of research and investigation activities on sanitary and environmental impact on biocides; Making mandatory both local control systems and reporting of all the necessary data on uses. Studying and sampling predators near the treated zones to address the alimentary chain contamination.
Latvia	<i>Missing</i>
Lithuania	No.
Luxembourg	-
Malta	-
Netherlands	No.
Poland	<i>Missing</i>
Portugal	<i>Missing</i>
Romania	Integrated methodological recommendations regarding the products based on active substances authorised in EU.
Slovakia	We support proposal for harmonised schemes for training on safe use and handling of biocides, authorised for professional use within EU.
Slovenia	Other measures: training, education, awareness raising also at EU level, preparation of guidelines for users of biocidal products (on the basis of risk assessments ob products), clear instructions, control of used equipment
Spain	-
Sweden	This would need an in depth analysis. It is not possible to give an extended answer.
UK	-