

Statement of EurO₃zon to the free radicals guidance document

By publishing document “**CA-Sept15-Doc.5.1.b - Final - Free radicals**” the CA-meeting did address the consideration of radicals generated and used for biocidal purpose. In the same document it is requested to edit a guidance document how to handle the case of free radicals. For this purpose a first draft for such a guidance, document “CA-Nov15-Doc.5.1 - Data requirements for free radicals”, was already discussed on the 62th CA meeting, and after further adaptations finally the document “Guidance on information requirements for free radicals in the context 20160129”¹ was circulated for further discussion and editing on the workshop of 8th February in Ede/the Netherlands.

The footnote of the document “CA-Sept15-Doc.5.1.b - Final - Free radicals” is pointing out that the document refers only to free radicals that are **intentionally** generated for a biocidal purpose. Nevertheless a lot of confusion arose in other branches due to the misunderstanding of the first drafts of the document that e.g. ozone or chlorine systems could fall under the case of “*free radicals*”.

EurO₃zon will participate in the workshop and wants to give its input to all stakeholders already in advance, such as following:

1. The Ozone AS-dossier of EurO₃zon being under evaluation since 2015 is exclusively focused on the production and use of ozone for biocidal purpose.
2. There are no radicals considered in this dossier, as all biocidal activity is described and proofed by use of ozone.
3. Use of ozone for biocidal purpose is the scope of CA-paper “**CA-May15-Doc.5.1.a - Final - Ozone**”. Radicals are not in the scope of that document.
4. Use of free radicals for biocidal purpose is in the scope of CA-paper “**CA-Sept15-Doc.5.1.b - Final - Free radicals**”.
5. If free radicals are used for biocidal purpose, “*the active substance shall be defined by mentioning only the free radical without reference to the precursor(s) or method of generation.*” (Citation from document “CA-Sept15-Doc.5.1.b - Final - Free radicals”).

Conclusion:

In order to avoid misunderstandings, the guidance document should contain a clear differentiation between the intentional production and biocidal use of **free radicals** on the one hand, and the intentional production and biocidal use of **any other active substance** (e.g. ozone, active chlorine or active bromine) on the other hand.

¹ Full title of this document: Guidance to specify information requirements for in situ generated free radicals for substance approval in the context of the BPR.