



Bundesanstalt für Arbeitsschutz  
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Federal Institute for Occupational  
Safety and Health

**Minority opinion of the German CA regarding the Union authorisation application  
“EuLA hydra-lime 23” discussed at BPC-43**

The German Competent Authority agrees with the quantitative assessment for the “Disinfection of indoor floor surfaces of animal accommodations and transportation”, the “Disinfection of animal accommodations; limewashing of walls” and the scenario “Disposal of small bags”.

The quantitative assessment indicates exceedance of the agreed Acceptable Exposure Concentration ( $AEC_{\text{inhalation}}$ ) for the active substance and thus unacceptable risks for the professional user.

However, we object to the qualitative assessment as it considers a 100% efficacy of the stipulated respiratory protective equipment, as this is not a realistic assumption.

We have no doubts on the appropriateness of the  $AEC_{\text{inhalation}}$  derived during the active substance approval. In our opinion the  $AEC_{\text{inhalation}}$  is not too conservative and the results of the quantitative assessment are reliable.

We do not agree with the final conclusion considering only the qualitative assessments made and ignore the unacceptable risks identified in the quantitative assessments.

In summary, there are unacceptable risks for the professional user for the “Disinfection of indoor floor surfaces of animal accommodations and transportation” (use 3), the “Disinfection of animal accommodations; limewashing of walls” (use 4) and the scenario “Disposal of small bags”. These uses should not be proposed for authorisation.