



**Ministry of Environment  
of Denmark**

Environmental  
Protection Agency

Pesticides and Biocides

Case No 2019 - 9071

Ref. NIFAL

June 22 2022

European Chemicals Agency  
Biocidal Products Committee  
Erik van de Plassche

### **BPC-43: Minority opinion on the union authorisation “SALVECO SALVESAFE PRODUCTS”.**

The Danish Competent Authority (DK CA) is of the opinion that having products with a virucidal claim without efficacy against non-enveloped viruses in PT4 would lower the food (and feed) safety.

We are of the opinion that disinfection of equipment, containers, consumption utensils, surfaces, pipework etc. associated with the production, storage or consumption of food or feed should require a claim against non-enveloped viruses.

The non-enveloped viruses are often the source of food-borne disease outbreaks compared to the enveloped viruses. Examples of such viruses are: rotavirus, norovirus (which are both common diseases linked to food), Hepatitis A and E.

Outbreaks of these specific viruses are continuously under surveillance by the authorities in DK, who are responsible for the preparedness against infectious diseases. This means that specifically non-enveloped viruses which can be transmitted via food is of concern.

This union authorisation contains a product to be used for surface disinfection in the food and feed industry (PT4), with a virucidal claim that only includes enveloped viruses. For the reasons stated above, the DK CA cannot agree to the authorisation of use 2 in meta SPC 7 of this union authorisation, thus resulting in a minority opinion.

Yours sincerely,

Nina Falk Gregersen  
+45 22 34 95 23  
nifal@mst.dk