

Discussion on the status of hydrogen peroxide used in irrigation systems

Introduction

1. The Dutch competent authority would like to discuss during the CA meeting if the use of hydrogen peroxide in irrigation systems in agriculture and horticulture is a biocidal use in scope of the BPR. These type of products are applied by filling the system with diluted product and rinse vigorously with water afterwards, but can also be applied by continuous dosing. The claim is to control the growth of bacteria and biofilm in the irrigation system to prevent unwanted clogging of pipes.

Discussion

2. These products are used in the agriculture and horticulture. Because of the area of use, it might be seen as a plant protection product.
3. The borderline between Plant Protection Products and Biocides is discussed in the “Guidance document agreed between the Commission services and the competent authorities of Member States for the biocidal products Directive 98/8/EC and for the plant protection products Directive 91/414/EEC on: Borderline between Directive 98/8/EC concerning the placing on the market of Biocidal product and Directive 91/414/EEC concerning the placing on the market of plant protection products” from 2001¹.
4. Although both the Directives for Plant Protection products and the one for Biocides are replaced by Regulations, the reasoning used in the guidance is still valid.
5. The guidance gives examples of plant protection products and examples of biocides. One of the examples of a biocidal product is: ‘Products used in hydroponic systems, not on the plants, but on the system itself to control harmful organisms that for example can clog pipes (either PT2 or PT 11)’.
6. Irrigation water (systems) can be seen as a hydroponic systems and unwanted clogging of pipes is the problem to be prevented.
7. Although both the water that is subject of treatment with the hydrogen peroxide product and the rinse water can come into contact with plants, the main objective of the treatment is to treat the water system and not the plants.

Conclusion

8. The Netherlands considers a product used for disinfection of irrigation water (systems) in agriculture and horticulture against bacteria and biofilm, to prevent unwanted clogging of pipes, a biocidal product.

¹ Link to document: <https://circabc.europa.eu/sd/a/b6d85f63-32d1-4297-8230-343b679b624f/Biocides%20-%20Borderline%20with%20plant%20protection%20products.pdf>