



Allocation of Risk Mitigation Measures: France Agency's Perspective

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REGULATORY BASIS

REGULATION (EU) N° 546/2011

B - EVALUATION - Specific principles

2.4.1.3. Member States shall examine the nature and characteristics of the protective clothing and equipment proposed with particular reference to the following aspects:

- obtainability and suitability,*
- ease of wearing taking into account physical stress and climatic conditions.*

REGULATORY BASIS

REGULATION (EU) N° 546/2011

B – DECISION MAKING - Specific principles

2.4.1.2. Where the proposed conditions of use require use of items of protective clothing and equipment, no authorisation shall be granted unless those items are effective and in accordance with the relevant EU provisions and are readily obtainable by the user and unless it is feasible to use them under the circumstances of use of the plant protection product, taking into account climatic conditions in particular.

Tasks for the agency

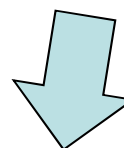
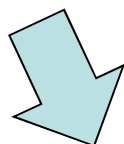
- **Risk managers asked the agency :**
 - to provide in opinions from the agency on PPP : clear recommendations on PPE to be used (when necessary)
 - to check the recommendations provided by notifiers

- **Consequently the agency asked to notifiers :**
 - to provide clear and precise recommendations for PPE

Basis for PPE recommendations

Hazard characterization
Reg. (EC) 1272/2008
Reg. (EU) 545/2011

Risk assessment
Reg. (EC) N° 1107/2009
Reg. (EU) N° 545/2011



PPE recommendations
Directive 89/686/EEC
Reg. (EU) N° 545/2011

PPE (according to Directive 89/686/EEC)



Chemical protective clothing

PPE category III: to protect against risks which may seriously or irreversibly harm health

Liquid tight	Spray tight	Spray tight (limited)	Tight Particle	CE Einfach
Typ 3	Typ 4	Typ 6	Typ 5	
EN 14605:2005	EN 14605:2005	EN 13034:2005	EN ISO 13982-1:2004	
- -	-	+/-	+/-	Ease of wearing

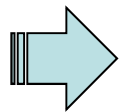
Body protection :

PPE and working coveralls

- Mostly worn by French farmers (*French survey*) :
 - Working coveralls : not PPE
 - Coveralls : Cat. III Type 5/6
 - Effectiveness identified (operator studies)
 - Can be recommended when exposure is low
- ISO 27065 (ISO 22608)
 - Could be used to certify working coveralls
- However, certified PPE needed when exposure is higher

Recommendations of PPE : procedure

- Recommendations provided by the notifier based on :
 - Risk assessment
 - Hazard assessment
 - To prevent exposure of farmers
 - Recommendations to farmers :
 - clear, simple, easy to follow



Recommendations checked by the agency

Exemple of PPE recommandations

- Use : Low crop tractor mounted
 - Mixing/Loading & Cleaning :
 - certified gown (partial body) cat.III type 3
 - certified gloves (EN 374-3)
 - working coverall (characteristics to be provided)
 - e.g. :fiber content , fabric weight (g/m²)
 - Application :
 - working coverall (characteristics to be provided)
 - certified gloves
 - Respiratory and Eyes/face protection
Depend on : hazard, type of PPP, RA

Conclusion

- PPE recommendations provided by the notifier and checked by the agency
- PPE recommendations are based on :
 - RA, hazard, to prevent exposure
- Working coveralls
 - mostly used and effective in several situations,
 - however currently not PPE
- ISO 27065 could be applied for certification of working coveralls

**Thank you for your
attention**