

**From:** "5.1.2.e" <5.1.2.e@nvwa.nl>  
**Sent:** Mon, 25 Nov 2024 21:19:28 +0100  
**To:** "5.1.2.e" <5.1.2.e@ctgb.nl>; "5.1.2.e" <5.1.2.e@minInv.nl>  
**Cc:** "5.1.2.e" <5.1.2.e@ctgb.nl>  
**Subject:** RE: Producten op basis van siliconen (Siltac, Stix, K-Pak)

Hoi 5.1.2.e

Met betrekking tot deze siliconen producten en discussie, volgen we het standpunt van het SCoPAFF en het Ctgb. Gezien de onduidelijkheid m.b.t. een eventuele overgangstermijn, treden we nog niet handhavend op tegen deze producten. Begrijp ik het goed dat de status 'ppp' nu ook weer ter discussie wordt gesteld?

Ik kan me overigens vinden in jullie antwoord.

Groeten,

5.1.2.e

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**Van:** 5.1.2.e <5.1.2.e@ctgb.nl>  
**Verzonden:** maandag 25 november 2024 14:38  
**Aan:** 5.1.2.e <5.1.2.e@minInv.nl>; 5.1.2.e <5.1.2.e@nvwa.nl>  
**CC:** 5.1.2.e <5.1.2.e@ctgb.nl>  
**Onderwerp:** Producten op basis van siliconen (Siltac, Stix, K-Pak)

Beste 5.1.2.e en 5.1.2.e

Onze servicedesk heeft vragen ontvangen van de distributeur van K-PAK (RAAT Agrochemical Trading) ivm de scope issues van middelen op basis van siliconen, ik heb de mail hieronder geplakt.

Ik wil ons antwoord met jullie afstemmen aangezien wij niet de handhavende partij zijn en de situatie momenteel ingewikkeld blijft. Er loopt namelijk nog steeds/weer een SCoPAFF discussie of dit ppp zijn en ook is niet duidelijk of er grace periods komen.

Ik stel voor als volgt te antwoorden:

*We are aware of the changes in the [scope document](#) with regard to Siltac and also the inclusion of K-PAK as PPP. It is our policy to follow the guidance offered in this document, which would mean that products like Siltac and K-PAK cannot be placed on the market without an authorisation as PPP. NL is of the opinion that these products are indeed ppp based on the fact that they are sprayed on plants to kill insects. Moreover, there is a clear [recommendation](#) from RIVM 'that these types of pest control agents are included in the definition of active substances in the EU regulations for biocides and for plant protection products'. We note that at the moment there is still an ongoing discussion within SCoPAFF, which includes a discussion on the implementation of the status change in the scope document.*

Graag hoor ik of jullie akkoord zijn met deze beantwoording.

Groet,

5.1.2.e

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**From:** 5.1.2.e <[5.1.2.e@raatgroesbeek.onmicrosoft.com](mailto:5.1.2.e@raatgroesbeek.onmicrosoft.com)>

**Sent:** dinsdag 19 november 2024 11:11

To: CTGB Servicedesk <[servicedesk@ctgb.nl](mailto:servicedesk@ctgb.nl)>

Subject: 24001945 - RAAT Agrochemical Trading - K-PAK scope 1107/2009

Dear reader,

I'm <sup>5.1.2.e</sup> distributor of K-Pak outside Poland.

Since March 2023, K-Pak, STYX and Siltac are discussed within the Standing Committee on Plants, Animals, Food and Feed Section Phytopharmaceuticals – Legislation. The outcome of these discussions was until now that the three products involved, are considered in the scope, which means they should be seen as PPP that have to be registered according to Regulation (EC) No. 1107/2009. In the list it says with K-Pak: The product contains modified trisiloxane that increase the wettability of hydrophobic surfaces including the pests (aphids and spider mites) feeding on plants, which “die as a result of disruption of physiological processes”. The latter mode of action is normally interpreted as invasive and was considered (see entry 40,100, 178, 222) as PPP.

Although the Scope and Borderline Issues list is not legally binding, Synthos Agro, (the Polish producer of K-Pak) asked the different member states if we were still allowed to sell K-Pak.

All member states asked, replied they followed the advice in the list, which means K-PAK could no longer be sold.

With this mail I like bring forward two issues:

1. K-Pak is not invasive and therefore should not been seen as a PPP.
2. The allowance to sell K-Pak.

#### **1. K-Pak is not invasive and therefore should not been seen as a PPP.**

The main ingredient of the K-PAK preparation is modified trisiloxane. Next to that K-Pak does not contain any chemical active substances. The committee interpretates K-Pak as invasive.

What is the definition of invasive in relation to small insects?

In relation to small insects, the term invasive generally refers to any action or process that physically, chemically, or biologically interferes with the insect's normal physiological functions, leading to harm, death, or disruption of essential systems like respiration, digestion, or reproduction. Here's how "invasive" can be defined in different contexts:

##### 1. Physical Invasiveness:

- Definition: A product or action is considered physically invasive if it penetrates or alters the insect's external structure or body, causing injury or fatality. This could include puncturing, suffocating, or otherwise compromising the insect's exoskeleton or respiratory system (such as blocking spiracles).

##### 2. Chemical Invasiveness:

- Definition: A product is chemically invasive if it enters the insect's body and disrupts internal systems, often through ingestion or absorption. These chemicals typically affect nerve, hormonal, or digestive systems.

##### 3. Biological Invasiveness:

- Definition: Biological invasiveness refers to methods that introduce biological agents (such as pathogens, predators, or parasitic organisms) to harm or kill insects by infecting or preying on them.

##### Non-Invasive in Relation to Small Insects:

A non-invasive product or action does not interfere with the internal physiology of the insect. Instead, it works by:

- Physically immobilizing (e.g., sticky traps, silicone barriers).
- Creating physical barriers that deter pests from landing or feeding on plants (e.g., reflective mulch, silicone films).
- Deterring behaviorally (e.g., repelling insects without causing harm).

Trisiloxanes are primarily known as super-spreaders or wetting agents, often used in agricultural applications to improve the efficacy of pesticides, fertilizers, and other treatments by enhancing the coverage and penetration of these substances on plant surfaces. However, on their own, trisiloxanes are not typically considered invasive to small insects like aphids or spider mites because they don't directly interfere with the insects' internal biological processes.

Trisiloxanes reduce the surface tension of liquids, allowing better spreading on plant surfaces. This means they enhance the spread of pesticides, but do not themselves act as a pesticide or chemically disrupt the insect's physiology.

**Non-Invasive Effect:** Since trisiloxanes don't enter the insect's body or disrupt their biological systems (such as the nervous system), they are not considered chemically invasive.

Trisiloxanes on their own do not have direct insecticidal properties, meaning they do not kill insects by poisoning them or interfering with their physiological processes.

**Environmental Impact:** Trisiloxanes are generally considered safe for humans, animals, and the environment in the concentrations typically used in agricultural applications. This is because they do not accumulate in biological systems or cause harm to non-target organisms.

Trisiloxanes are valued for their ability to reduce environmental impact by enhancing the efficiency of treatments, meaning less chemical use may be required overall.

Sources:

Next to general knowledge about how trisiloxanes are used in agricultural and chemical applications following articles:

1. **"The Onset and Early Stages of Dynamic Wetting of Superspreading and Non-Superspreading Trisiloxane Surfactant Solutions on Hydrophobic Surfaces":**
  - This study focuses on the wetting behavior of trisiloxanes like **S240** (a superspreader) and compares it to non-superspreaders. It confirms the physical mode of action in spreading on hydrophobic surfaces, which is relevant for their role in agriculture as non-invasive surfactants([MDPI](#), Publiced Jan. 2024).
2. **"Surface Tension Behavior of Superspreading and Non-Superspreading Trisiloxane Surfactants":**
  - This article explains how trisiloxane surfactants work by reducing surface tension, thereby promoting spreading. It highlights that their mechanism is **physical**, focusing on surface interactions, and does not invade the biological systems of pests ([SpringerLink](#), Publiced April 2023).
3. **"Research Progress in Structure Synthesis, Properties, and Applications of Small-Molecule Silicone Surfactants":**
  - This paper explores the synthesis and properties of trisiloxane surfactants, with a focus on their application in various industries, including agriculture. The article emphasizes their role as surfactants rather than active pest control agents, further supporting their non-invasive nature([SpringerLink](#), Publiced April 2024).

These articles collectively support the idea that **trisiloxanes** act as physical surfactants, enhancing the performance of agrochemicals without directly affecting pests on a biological level. You can find more details in these studies on **SpringerLink** by searching for the titles.

Also, the polymers in K-PAK are on the ORGANIC MATERIALS REVIEW INSTITUTE (OMRI) list in the United States of America. Therefore, they can be used in certified organic production in accordance with the provisions of the USDA National Organic Program. K-PAK ingredients are listed in the following chemical inventories: European Inventory of Existing Chemical Substances (EINECS), TSCA Chemical Substance Inventory US EPA, Japanese Existing and New Chemical Substances (ENCS), Australian Inventory of Chemical Substances (AICS), ECL, PICCS CHINA, Canada Non-Domestic Substance List (NDSL). For all monomers of silicone copolymers contained in the preparation, the registration conditions required by Regulation EC No. 1907/2006 of the European Parliament and the European Council have been met.

**Thus, our conclusion is: K-Pak is not invasive and should not be seen as a PPP.**

## 2. The possibility to sell K-Pak.

As I told you in the first lines of this mail member states told Synthos Agro we were not allowed to sell K-Pak. However, we learned Siltac and STYX are still sold in the different member states, including yours. It seems that they are allowed to do so, as long as the discussion about these products is going on in the committee, or the committee was convinced by similar information as above about the non-invasiveness of trisiloxanes, showing these products do not disrupt the physiological processes of the insects.

Here also we ask you for alignment of conclusions and ask you to allow us to sell K-Pak as from today.

Next to giving us allowance to sell K-Pak in your country I like to ask you to bring forward the information about K-Pak not being invasive described above in the Standing Committee.

I'm looking forward to receive your comments as soon as possible giving us the same change as our competition.

Kind regards,

5.1.2.e

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