Session 3 - Reflections from Stakeholders 2 – Proposals to overcome challenges and areas for prioritisation

22 Oct 2026

Which assessment areas should be prioritised for early implementation in pesticides and biocides, considering scientific readiness, regulatory need and the potential reduction in animal use?

1

Aquatic endocrine studies

- In vivo data are required for all substances
- Testing beyond MTC is inferred
- Activity and adversity according to ED criteria

2

Developmental neurotoxicity

- In vivo data are a “core” information requirement under BPR
- (potential adaptation for Reprotox substances)

3

Carcinogenicity

- In vivo data in 2 species usually required
- Need for greater use of WoE approaches using standard data (RDT, gene tox, etc.) at first tier

What concrete measures—such as pilot assessments, regulatory “safe spaces”, guidance updates, training or targeted research—would have the greatest impact in overcoming current implementation barriers?

1

Reinforce risk-based approaches

- Many studies performed and designed for classification criteria
- Risk-based could reduce number of tests/DRFs as well as severity of testing

2

Guidance updates/training

- De-centralized evaluation/peer review processes
- Effective use of alternatives requires sufficient dedicated expertise to understand available methods (in vivo and alternatives) and their limitations, applicability domains, etc.

3

Tiered testing approaches

- Build trust and confidence by allowing tiered testing approaches rather than absolute replacement
- Open discussions to plan strategy, address uncertainties and agree next steps

Are there any sector-specific considerations for pesticides and biocides that need particular attention during implementation of the roadmap?

1

Legislative barriers under BPR

- In vivo data required for several endpoints (no adaptations for alternative methods)

2

Priority on reducing animal testing

- Current priority is on speed of evaluation
- Need for greater political will to take pragmatic regulatory decisions based on a weight of evidence approach

3

Cost sensitivity

- The biocides market is relatively small and is heavily fragmented. The business case underpinning investment decisions is often borderline.



Thank you

Use biocides safely. Always read the label and product information before use. All information in this presentation corresponds to Arxada´s knowledge on the subject at the date of publication, but Arxada makes no warranty as to its accuracy or completeness and Arxada assumes no obligation to update it. All information in this presentation is intended for use by recipients experienced and knowledgeable in the field, who are capable of and responsible for independently determining the suitability and to ensure their compliance with applicable law. Proper use of this information is the sole responsibility of the recipient. Republication of this information or related statements is prohibited. Information provided in this presentation by Arxada is not intended and should not be construed as a license to operate under or a recommendation to infringe any patent or other intellectual property right. All trademarks belong to Arxada or its affiliates or to their respective third parties and are used here only for informational purposes. Copyrighted material has been produced with permissions or under license, all other materials © 2025 Arxada.