

General Declaration

To: Whom it may concern
From: Smit, Weesp

Date: February 6, 2026
Topic: Biocidal Products Regulation

We, Smit, Weesp, The Netherlands, herewith declare the following:

The definition of a biocidal product in the Biocidal Products Regulation is as follows:

Article 3

Definitions

1. For the purposes of this Regulation, the following definitions shall apply:

(a) 'biocidal product' means

- any substance or mixture, in the form in which it is supplied to the user, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action,
- any substance or mixture, generated from substances or mixtures which do not themselves fall under the first indent, to be used with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action.

A treated article that has a primary biocidal function shall be considered a biocidal product.

[...]

(I) 'treated article' means any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products;

At this moment Smit does not supply biocidal products for use in leather tanning.

Our post-tanning products are designed to modify and/or upgrade leather properties, they do not have the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism.

Some of our products contain a small amount of in-can preservative, with the sole function of protecting the product itself during its shelf life. These preservatives do not have the intention to protect the leather against harmful organisms.

These products have been or will be registered as such.

Our product Syntan ZLR 100 contains a significant amount of zeolite and can be used as a fixing agent for dyestuff and/or other anionic retanning agents or fatliquors. Its application is recommended before neutralization and/or as a fixing agent after the last acid fixation when the pH is around 2.5 and the disinfection steps have already occurred. Therefore, the zeolites do not have the intention to prevent the growth of harmful microorganisms on the leather.

Handelmaatschappij A. Smit en Zoon B.V.

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All data and recommendations herein are accurate at the time of publication. Smit & Zoon reserves the right to modify them without notice. Work conditions and type of raw material can affect the final results. It is the responsibility of the user to apply the recommendations to the actual conditions and particular purposes.

If you have any further questions, please do not hesitate to contact us.

Certified true and correct.

Signature:



Giulia Nencioni
Product Regulatory Affairs Manager