

Novadan ApS  
Platinvej 21  
DK-6000 Kolding

Reykjavík, 19 February 2026  
UOS-3171/B.B.B.

## Enforcement on biocidal products – PT3

### Inspection Findings – Requirements for Corrective Actions

The Icelandic Environment and Energy Agency (*Umhverfis- og orkustofnun*) is working on an enforcement project on biocidal products, in accordance with the Agency's role under the Chemicals Act No 61/2013 and Regulation No 878/2014 on Biocidal Products, which implements Regulation (EU) No 528/2012 (BPR) into Icelandic legislation. Findings of the enforcement project will be submitted to the European Chemicals Agency (ECHA) and will be a contribution to the EU/EFTA coordinated enforcement project BEF-3, organized by ECHA. The objective of BEF-3 is to harmonize enforcement across member states regarding the use of information from the SPC in the labelling and safety data sheets of biocidal products made available on the EEA market.

The Agency refers to a letter addressed to the Icelandic company Kemi ehf., dated 21.05.2025, where the company is notified about an upcoming inspection on marketing and labelling of biocidal products of product-type 3 (veterinary hygiene). The inspection was carried out the following day at the Kemi ehf. premises located at Tunguháls 10, 110 Reykjavík. During the inspection it was i.a. assessed whether products holding a market authorisation in Iceland were labelled in accordance with the approved Summary of Product Characteristics (SPC). In addition, it was assessed whether information in the safety data sheet (SDS) was consistent with the SPC, and that section 1.4 (Emergency Information Service) had been localized.

Three biocidal products that fall under the scope of the project were inspected, all teat dipping products holding a BPR market authorisation. Novadan ApS is the authorisation holder and shall ensure that the biocidal products are labelled in accordance with the approved Summary of Biocidal Product Characteristics (SPC), in accordance with Article 69 of the BPR.

The biocidal products subject to inspection, trade name, authorisation number and distributor in Iceland.

Trade name	Authorisation number	Icelandic distributor
Nova La Spray	EU-0032465-0000	Kemi ehf.
Jopo Film	EU-0019757-0000	Kemi ehf.
Nova Dip	EU-0019575-0000	Kemi ehf.

Non-compliances identified during the inspection are detailed in the attached inspection report in Icelandic and summarized in English below.

### Product: Nova Dip

Description of non-compliance	Legal/regulatory provisions
1. The hazard statement H412 is not written correctly in Icelandic. It should be "Skaðlegt lífi í vatni, hefur langvinn áhrif".	<b>Deviation</b> from Article 69(1) of Regulation (EU) No 528/2012, as implemented by Icelandic Regulation No 878/2014 on biocidal products.
2. The sentence "Lesið fyrst meðfylgjandi leiðbeiningar" does not comply with the requirement for the standard sentence "Lesið meðfylgjandi leiðbeiningar fyrir notkun".	<b>Deviation</b> from point (i) of Article 69(2) of Regulation (EU) No 528/2012, as implemented by Icelandic Regulation No 878/2014 on biocidal products.

### Product: Jopo Film

Description of non-compliance	Legal/regulatory provisions
1. The signal word, hazard and precautionary statements in Icelandic are missing on the label in accordance with section 6 of the SPC for the product.	<b>Deviation</b> from Article 4 of Regulation No. 415/2014 CLP and Article 32(1) of the Chemicals Act No. 61/2013.
2. The Unique Formula Identifier (UFI) is missing from the label.	<b>Deviation</b> from Articles 20 - 22 and point 7 of Article 25 of Regulation (EU) No 1272/2008 (CLP), as implemented by Regulation No 415/2014.

The Environment and Energy Agency would like to emphasize that it is prohibited to place on the market any products that do not comply with the requirements concerning authorisation and labelling, cf. Article 35(1) and Article 32(3) of the Chemicals Act.

**The Agency sets out a deadline until 12 March 2026 for Novadan ApS to submit updated labelling for the above-mentioned products. Existing stocks of the product shall be re-labelled with updated labelling approved by the Agency.**

**Confirmation of corrective actions shall be submitted by email to the Agency's official address: [uos@uos.is](mailto:uos@uos.is), referencing case number UOS-3171.**

Novadan ApS has until 5 March 2026 to present its comments or remarks to the Agency about the contents of this letter, pursuant to Article 13 of the Icelandic Administrative Act No 37/1993.

Please note that, in accordance with Article 49(5) of the Chemicals Act, the Agency will publish on its official website information regarding the inspection results and any enforcement measures taken, as soon as decisions on such measures are finalized. If the company considers that any part of this letter or the inspection report contains information that should be treated as confidential, it must notify the Agency and provide a justified request to that effect no later than 5 March 2026.

The Agency would also like to note that, under Chapter XIII of the Chemicals Act, the Agency may apply enforcement measures to ensure compliance with the Act, including suspension of products from the Icelandic market (Articles 57 and 58).

Furthermore, pursuant to the Icelandic Environment and Energy Agency's list of fees No 1033/2025, the Agency will charge an hourly fee of ISK 22.400 (approx. DKK 1.140) for follow-up inspections and enforcement activities, cf. Article 22.

Further information regarding biocidal products can be found [here](#).

Yours sincerely,

Bergdís Björk Bæringsdóttir  
Chemicals Unit

Hafdís Inga Ingvarsdóttir  
Chemicals Unit

Attached documentation:

Notification about an upcoming inspection at Kemi ehf. (only available in Icelandic)  
Enforcement report – Kemi ehf. (only available in Icelandic)