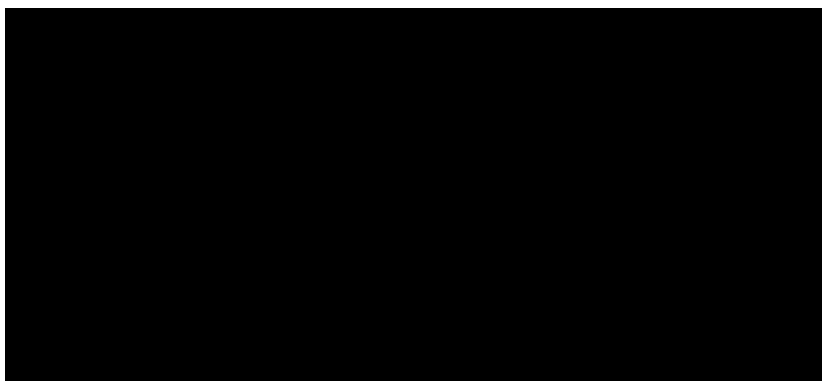


March 23, 2020

Object : Public consultation on Alpha-bromadiolone

Rodents are known to be vectors of multiple bacteria and viruses leading to serious and sometime fatal disease e.g. leptospirosis , salmonellosis, Hantavirus pulmonary syndrome, etc...Plague has disappeared from Europe since eighteen century but is still present in Central Asia and could threaten eastern Europe with climate change¹. They proliferate in big cities and need to be controlled by all means to avoid major health issues for the general public.

Therefore, I think it is an excellent news that a company had managed to provide a new molecule that is effective with an improved ecotox profile. All solutions are needed, physical, chemical, prevention (removing food source, cleaning) but none is sufficient to cope with the problem. With the implementation of Biocide Directive 98/8 and regulation 528/2012, many PT14 have been phased out, so all new active substances are needed. Although it is a candidate for substitution, not approving this substance would have “disproportionate negative impact for society” as mentioned in Reg 528/2012.



Consultant in Biocide and Plant Protection Products

¹ <https://www.ecdc.europa.eu/en/climate-change/climate-change-europe/rodent-borne-diseases>