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Information obtained during the consultation on potential candidates for substitution from 03/11/2023 until 04/01/2024.

Substance name:	Dinotefuran
Product type:	18
Intended use:	Dinotefuran is an active substance proposed for use to control arthropods (e.g. insects, arachnids and crustaceans), by means other than repulsion or attraction (e.g. insecticide, acaricide)
EC number:	605-399-0
CAS number:	165252-70-0
eCA:	Belgium

Comment 1	**2023/11/28 23:19**
Country	Belgium
Name of organization/institution	
Alternative Identity and Properties	
Technical Feasibility	
Economic Feasibility	
Hazards and Risks of the Alternative	
Availability	
Conclusion on suitability and availability of the alternative	For the reason listed in section 6, it doesn't seem reasonable to approve this kind of use.
Other comments	We are discussing here one specific use for this substance : the use against house flies in animal housing, by farmers. The BPR authorizations for this kind of products allow only application on specific surfaces where environmental exposure is impossible, like removable panels, presumably because any environmental exposure due to washing of treated surfaces would lead to rejection of the approval.

	From our experience on the field, with farmers, products like this are not applied as instructed, they are applied as they always were before the BPR authorization : directly on walls and on surfaces where flies land. This can be easily spoted in case of controls on the field. It looks like one of those situations where the registration holders get very strict authorizations, knowing that users will use the product as they used to anyway. For this reason, it doesn't seem reasonable to approve this kind of use.
References	
Attachments (non-confidential information)	
Attachments (confidential information)	

Comment 2	**2023/12/22 10:10**
Country	Ireland
Name of organization/institution	Mitsui Chemicals Crop & Life Solutions, Inc.
General information	Analysis of Alternatives assessment
Alternative Identity and Properties	
Technical Feasibility	
Economic Feasibility	
Hazards and Risks of the Alternative	
Availability	
Conclusion on suitability and availability of the alternative	The analysis of alternatives for dinotefuran and authorised dinotefuran-containing biocidal products was carried out during 30 August – 05 September 2023. There are 4 authorised dinotefuran-related biocidal products, all within product-type 18: Dinotefuran 2% bait (gel-bait against cockroaches), Addict gel cockroach (gel-bait against cockroaches), Addict gel ants (bait station or gel drops application against ants) and SAFWS002 (window sticker against houseflies). To identify possible alternatives to dinotefuran and dinotefuran-containing products included a

	data search using publicly available tools and databases, as outlined in the ECHA's Guidance on Analysis of Alternatives (January 2023). The data search results were carefully reviewed considering the target organisms of the products found in the search and compared to dinotefuran-containing biocidal products: cockroaches, ants and houseflies. The products with matching target organisms to dinotefuran-containing products were further reviewed and a conclusion was drawn if the alternative was selected or rejected for further assessment. The alternatives were reviewed regarding the application method and category of users as well as description of use in comparison to dinotefuran-containing products. One substance, indoxacarb, with CAS number: 144171-61-9, was identified as a possible alternative to Dinotefuran 2% bait and Addict gel cockroach biocidal products and the substance was reviewed in detail. It was concluded that Advion Cockroach cannot be considered as a suitable alternative to dinotefuran in Dinotefuran 2% bait or Addict gel cockroach due to more hazardous and toxic properties of indoxacarb specified in the harmonised classification according to CLP. No other alternatives to dinotefuran and dinotefuran-containing products were found during the analysis of alternatives.
Other comments	
References	
Attachments (non-confidential information)	DNT PT18 RNL AoA-final (15 Nov 2023)_public version.pdf
Attachments (confidential information)	[redacted]