Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products

PRODUCT ASSESSMENT REPORT OF A BIOCIDAL PRODUCT FOR THE MINOR CHANGE OF A NATIONAL AUTHORISATION



Product identifier in R4BP	CHEMRAT BD-3
Product type(s):	14 (Rodenticide)
Active ingredient(s):	Bromadiolone
Case No. in R4BP	BC-WV054181-10 (NA-MIC)
Asset No. in R4BP	ES-0019307-0000
Evaluating Competent Authority	Spain
Internal registration/file no	ES/BB(NA)-2018-14-00509
Date	August 2018 (updated June 2020)

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Application	Ref	Case	Decision date	Assessment carried out
type	MS	number/Asset		(i.e. first authorisation
		number in the		/ amendment
		ref MS		/renewal)
NA-BBS	ES	BC-HJ040235-50	August 2018	Authorisation of same
		ES-0019307-0000		biocidal product
NA-MIC	ES	BC-WV054181-10	June 2020	Post-authorization:
		ES-0019307-0000		Results long term stability
				test

1 Conclusion

The assessment presented in this report includes the minor change submitted by the applicant.

It is concluded that the ready-to-use product, CHEMRAT BD-3, with the active substance bromadiolone, at a level of 0.0029% w/w, may be authorised for use as a rodenticide (product-type 14). This product is a same biocidal product (BB) of AGRORAT BD-3 (ES-0003204-0000). Now a NA-MIC has been submitted and a PAR has been done.

Regarding physical and chemical properties and efficacy the conclusions are the same as the product AGRORAT BD-3

According to Commission Regulation (EU) 2016/1179 the product CHEMRAT BD-3, with the active substance bromadiolone, at a level of 0.0029% w/w is classified as SPECIFIC TARGET ORGAN TOXICITY AFTER REPEATED EXPOSURE. CATEGORY 2 (STOT RE 2); H373 May cause damage to organs (blood) through prolonged or repeated exposure.

The risk assessment for the environment has been performed for the intended uses indoors, outdoors around buildings and outdoor in open areas and waste dumps. It keeps the same conclusion as the product AGRORAT BD-3.

Therefore, CHEMRAT BD-3 can be authorised as a rodenticide product against house mice (*Mus musculus*) and brown rats (*Rattus norvegicus*). It is to be used indoors, outdoors around buildings and outdoor in open areas and waste dumps. The users can be general public, professional and trained professional. It is a ready to used bait to be used in tamper-resistant bait stations.

The specific intended uses of the product are in section 2.4. of this assessment report.

Please, note that this assessment report includes all the uses requested by the applicant and assessed by ES CA, only as information for the concerned Member States.

Spanish CA only grants the use of CHEMRAT BD-3 according to the table 5 included in this assessment report due to our national risk mitigation measures.

2 Summary of the product assessment

2.1 Administrative information

2.1.1 Identifier in R4BP

CHEMRAT BD-3

2.1.2 Manufacturer(s) of the product

Name of manufacturer	LABORATORIOS AGROCHEM, S.L.
Address of manufacturer	C/ Tres Rieres, 10 08292 - Esparreguera (Barcelona) SPAIN
Location of manufacturing sites	C/ Tres Rieres, 10 08292 - Esparreguera (Barcelona) SPAIN

2.1.3 Manufacturer(s) of the active substance(s)

Active substance	Bromadiolone
Name of manufacturer	LABORATORIOS AGROCHEM S.L
Address of manufacturer	C/ Tres Rieres, 10 08292 - Esparreguera (Barcelona)
	SPAIN
Location of manufacturing sites	C/ Tres Rieres, 10
	08292 - Esparreguera (Barcelona)
	SPAIN

2.2 Composition and formulation

2.2.1 Qualitative and quantitative information on the composition

Table 1

Common name	IUPAC name	Function	CAS number	EC number	Content (%)
Bromadiolone	3-[(1RS,3RS;1RS,3SR)-3- (4'-bromobiphenyl-4-yl)-3- hydroxy-1- phenylpropyl]-4- hydroxycoumarin	Active substance	28772-56-7	249-205-9	0.0029
		Non-active substances			

- The product contains a bittering agent and a dye.
 - > Information on the full composition is provided in the confidential annex (see chapter 4).
- According to the information provided the product contains no nanomaterial as defined in Article 3 paragraph 1 (z) of Regulation No. 528/2012

2.2.2 Information on the substance(s) of concern

No substance of concern was identified upon initial assessment (the application for authorisation was submitted and the assessment took place before the Biocidal Products Regulation 528/2012 entered into force).

2.2.3 Candidate(s) for substitution

No candidate for substitution was identified upon initial assessment (the application for authorisation was submitted and the assessment took place before the Biocidal Products Regulation 528/2012 entered into force).

Now that the Biocidal Products Regulation 528/2012 entered into force, the following substance(s) was/were identified as candidate(s) for substitution upon this renewal:

Bromadiolone does meet the exclusion criteria according to Article 5(1) BPR. Because the following exclusion criteria are met:

- toxic for reproduction category 1B
- · persistent, bioaccumulative and toxic

And therefore, Bromadiolone does meet the conditions laid down in Article 10 BPR, and is consequently a candidate for substitution.

2.2.4 Type of formulation

Ready-to-use bait: grain

2.3 Classification and Labelling according to the Regulation (EC) No 1272/2008

Table 2

Classification	
Hazard classes, Hazard categories	Hazard statements
Specific target organ toxicity after repeated exposure. Category 2 (STOT RE 2)	H373 May cause damage to organs (blood) through prolonged or repeated exposure

Table 3

Labelling		
	Code	Pictogram / Wording
Pictograms	GHS08	
Signal word		WARNING
Hazard statements	H373	May cause damage to organs (blood)
		through prolonged or repeated exposure
Supplemental hazard information	-	
Supplemental label elements	-	
Precautionary statements	P102	Keep out of reach of children
	P103	Read label before use.
	P260	Do not breathe dust
	P280	Wear protective gloves.
	P314	Get medical advice/attention if you feel unwell.
	P501	Dispose of contents and/ or container as a hazardous waste to a registered establishment or undertaking, in accordance with current regulations.
Note	-	

2.4 Use(s) appropriate for further authorisation

In order to make proper use of the standard sentences for SPCs for rodenticides it is considered necessary to split the uses currently evaluated in Spain further down:

Table 4

Use(s) considered appropriate for authorisation after former assessment (uses currently evaluated in SPAIN		Use(s) appropriate for further authorisation	
1	House mice and/or brown rats – general public– indoor	1	House mice and rats – general public - indoor
		2	Brown Rats – general public – outdoor around buildings
2	House mice and/or brown rats –	3	House mice – professionals - indoor
professionals – indoor	4	Brown Rats – professionals - indoor	
		5	House mice and/or rats – Professionals – outdoor around buildings
3	House mice and/or brown rats - trained	6	House mice and/or rats – trained
	professionals – indoor		professionals - indoor
		7	House mice and/or rats – trained
			professionals – outdoor around buildings
		8	Brown Rats – trained professionals –
			outdoor open areas & waste dumps

Uses authorized in Spain according national Risk Mitigation Measures

Table 5

Use(s) considered appropriate for authorisation after former assessment (uses currently <u>under authorisation in Spain</u>)	Use(s) appropriate for authorisation in Spain according national Risk Mitigation Measures.
House mice and/or brown rats – general public– in and around buildings	House mice and Brown rats – general public - indoor
	Brown Rats – general public – outdoor around buildings
House mice and/or brown rats – professional– in	House mice – professionals - indoor
and around buildings	Brown Rats – professionals - indoor
	Brown Rats – Professionals – outdoor around buildings
House mice and/or brown rats – trained	House mice and/or Brown rats – trained
professional- in and around buildings, open	professionals - indoor
areas and waste dumps	Brown Rats – trained professionals – outdoor
	around buildings.

2.4.1 Use 1- House mice and brown rats - general public - indoor

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	Indoor
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations
Application rate(s) and frequency	Mice: bait boxes with 60g of product each 5-10m 60g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10m (5m in case of strong infestation and 10m in case of weak infestation). Rats: bait boxes with 100g of product each 5-10m 100g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation).
Category(ies) of users	General public
Pack sizes and packaging material	Maximum pack size of 150g. Number of packed bags per packaging: up to 150g Grams/kg of bait per packed bag: individual sachets of 10 to 100 g Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET o LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC.

2.4.1.1 Use-specific instructions for use

The bait stations should be visited [for mice - at least every 2 to 3 days at] [for rats - only 5 to 7 days after] the beginning of the treatment and at least weekly afterwards, in order to check whether the bait is accepted, the bait stations are intact and to remove rodent bodies. Re-fill bait when necessary.

2.4.1.2 Use-specific risk mitigation measures

2.4.1.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- See section 2.5.3.

2.4.1.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.1.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.2 Use 2- Brown Rats - general public - Outdoor around buildings

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Rattus norvegicus (brown rats)
Field(s) of use	Outdoor around buildings
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations
Application rate(s) and frequency	Rats: bait boxes with 100g of product each 5-10m 100g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation)
Category(ies) of users	General public
Pack sizes and packaging material	Maximum pack size of 150g. Number of packed bags per packaging: up to 150g Grams/kg of bait per packed bag: individual sachets of 10 to 100 g. Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC.

2.4.2.1 Use-specific instructions for use

- Place the bait stations in areas not liable to flooding.
- Replace any bait in a bait station in which bait has been damaged by water or contaminated by dirt.
- The bait stations should be visited only 5 to 7 days after the beginning of the treatment and at least weekly afterwards, in order to check whether the bait is accepted, the bait stations are intact and to remove rodent bodies. Re-fill bait when necessary.

2.4.2.2 Use-specific risk mitigation measures

See section 2.5.2

2.4.2.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- See section 2.5.3.

2.4.2.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.2.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.3 Use 3- House mice - professionals - indoor

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Mus musculus (house mice)
Field(s) of use	Indoor

Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Mice: bait boxes with 60g of product each 5-10m 60g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation)
Category(ies) of users	Professionals
Pack sizes and packaging material	Minimum pack size of 3 kg. Number of packed bags per packaging: up to 30 kg. Grams/kg of bait per packed bag: individual sachets of 10 to 60 g Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC. Furthermore, the product can be supplied as loose grain directly inside the secondary packaging mentioned above. In this case, the maximum pack size is 10kg.

2.4.3.1 Use-specific instructions for use

- The bait stations should be visited at least every 2 to 3 days at the beginning of the treatment and at least weekly afterwards, in order to check whether the bait is accepted, the bait stations are intact and to remove rodent bodies. Re-fill bait when necessary.
- Follow any additional instructions provided by the relevant code of best practice.

2.4.3.2 Use-specific risk mitigation measures

-See section 2.5.2

2.4.3.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.

2.4.3.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.3.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.4 Use 4 – Brown Rats – professionals – indoor

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Rattus norvegicus (brown rats)
Field(s) of use	Indoor.
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Rat: bait boxes with 100g of product each 5-10m
	100g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation).
Category(ies) of users	Professionals
Pack sizes and packaging material	Minimum pack size of 3 kg. Number of packed bags per packaging: up to 30 kg.
	Grams/kg of bait per packed bag: individual sachets of 10 to 100g
	Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC. Furthermore, the product can be supplied as loose grain directly inside
	the secondary (packaging mentioned above). In this case, the maximum pack size is 10kg.

2.4.4.1 Use-specific instructions for use

- The bait stations should be visited only 5 to 7 days after the beginning of the treatment and at least weekly afterwards, in order to check whether the bait is accepted, the bait stations are intact and to remove rodent bodies. Re-fill bait when necessary.

- Follow any additional instructions provided by the relevant code of best practice.

2.4.4.2 Use-specific risk mitigation measures

-See section 2.5.2

2.4.4.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.

2.4.4.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.4.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

See section 2.5.5

2.4.5 Use 5 – House mice and/or brown rats – professionals – outdoor around buildings

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Mus musculus (house mice)
development stage)	Rattus norvegicus (brown rats)

Field(s) of use	Outdoor around buildings
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Rats: bait boxes with 100 g of product each 5-10m 100g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation). Mice: bait boxes with 60g of product each 5-10m. 60g of bait per bait station. If more than one bait station is needed, the minimum distance between bait stations should be of 5-10 meters (5m in case of strong infestation and 10m in case of weak infestation).
Category(ies) of users	Professionals
Pack sizes and packaging material	Minimum pack size of 3 kg. Number of packed bags per packaging: up to 30 kg. Grams/kg of bait per packed bag: individual sachets 10 to 100g Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC. Furthermore, the product can be supplied as loose grain directly inside the secondary packaging mentioned above. In this case, the maximum pack size is 10kg.

2.4.5.1 Use-specific instructions for use

- Protect bait from the atmospheric conditions (e.g. rain, snow, etc.). Place the bait stations in areas not liable to flooding.
- The bait stations should be visited [for mice at least every 2 to 3 days at] [for rats only 5 to 7 days after] the beginning of the treatment and at least weekly afterwards, in order to check whether the bait is accepted, the bait stations are intact and to remove rodent bodies. Re-fill bait when necessary.
- Replace any bait in a bait station in which bait has been damaged by water or contaminated by dirt.
- Follow any additional instructions provided by the relevant code of best practice.

2.4.5.2 Use-specific risk mitigation measures

- Do not apply this product directly in the burrows

2.4.5.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait stations close to surface waters (e.g. rivers, ponds, water channels, dykes, irrigation ditches) or water drainage systems, ensure that bait contact with water is avoided.

2.4.5.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.5.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.6 Use 6 - House mice and/or brown rats - trained professionals - indoor

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	Indoor
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Rats: bait boxes with 100-200 g per baiting point Mice: bait boxes with 60-100 g per baiting point Not relevant in ES]: Permanent baiting
Category(ies) of users	Trained professionals
Pack sizes and packaging material	Minimum pack size of 3 kg. Number of packed bags per packaging: up to 30 kg. Grams/kg of bait per packed bag: individual sachets of 10 to 100g

Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC.
Furthermore, the product can be supplied as loose grain directly inside the secondary packaging mentioned above. In this case, the maximum pack size is 10kg.

2.4.6.1 Use-specific instructions for use

- Remove the remaining product at the end of treatment period
- Follow any additional instructions provided by the relevant code of best practice.

[Not relevant in ES]:

Additional specific instruction of use for permanent baiting:

- Where possible, it is recommended that the treated area is revisited every 4 weeks at the latest in order to avoid any selection of a resistant population.
- [When available] Follow any additional instructions provided by the relevant code of best practice.

2.4.6.2 Use-specific risk mitigation measures

- Where possible, prior to the treatment inform any possible bystanders (e.g. users of the treated area and their surroundings) about the rodent control campaign
- Consider preventive control measures (e.g. plug holes, remove potential food and drinking as far as possible) to improve product intake and reduce the likelihood of reinvasion.
- To reduce risk of secondary poisoning, search for and remove dead rodents during treatment at frequent intervals, in line with the recommendations provided by the relevant code of best practice.
- Do not use the product as permanent baits for the prevention of rodent infestation or monitoring of rodent activities [unless authorised for permanent baiting treatments].
- Do not use the product in pulsed baiting treatments.
- This product shall only be used indoors and places that are not accessible to children or non-target animals.

[Not relevant in ES]:

Additional specific risk mitigation measures for permanent baiting:

- Permanent baiting is strictly limited to sites with a high potential for reinvasion when other methods of control have proven insufficient.

- The permanent baiting strategy shall be periodically reviewed in the context of integrated pest management (IPM) and the assessment of the risk for re-infestation.

2.4.6.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait points close to water drainage systems, ensure that bait contact with water is avoided.

2.4.6.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.6.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.7 Use 7 – House mice and/or brown rats – trained professionals – outdoor around buildings

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	Outdoor around buildings
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Rats: bait boxes with 100-200 g per baiting point Mice: bait boxes with 60-100 g per baiting point Burrow: 200 g of bait per burrow only inside of tamper resistant baiting
	Stations Not relevant in ES]: Permanent baiting
Category(ies) of users	Trained professionals

Pack sizes and packaging material	Minimum pack size of 3 kg.
	Number of packed bags per packaging: up to 30 kg.
	Grams/kg of bait per packed bag: individual sachets of 10 to 100 g
	Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC. Furthermore, the product can be supplied as loose grain directly inside the secondary (packaging mentioned above). In this case, the maximum pack size is 10kg.

2.4.7.1 Use-specific instructions for use

- Protect bait from the atmospheric conditions. Place the baiting points in areas not liable to flooding.
- Replace any bait in baiting points in which bait has been damaged by water or contaminated by dirt.-Remove the remaining product at the end of treatment period (except when directly applied to burrows inside of tamper resistant baiting stations)
- Baits must be placed to minimise the exposure to non-target species and children.
- Cover or block the entrances of baited burrows to reduce the risks of bait being rejected and spilled.
- -Follow any additional instructions provided by the relevant code of best practice.

[Not relevant in ES]:

Additional specific instruction of use for permanent baiting:

- Where possible, it is recommended that the treated area is revisited every 4 weeks at the latest in order to avoid any selection of a resistant population.
- [When available] Follow any additional instructions provided by the relevant code of best practice.

2.4.7.2 Use-specific risk mitigation measures

- Where possible, prior to the treatment inform any possible bystanders (e.g. users of the treated area and their surroundings) about the rodent control campaign.
- Consider preventive control measures (plug holes, remove potential food and drinking as far as possible) to improve product intake and reduce the likelihood of reinvasion.
- To reduce risk of secondary poisoning, search for and remove dead rodents during treatment at frequent intervals, in line with the recommendations provided by the relevant code of best practice.
- Do not use this product as permanent baits for the prevention of rodent infestation or monitoring of rodent activities [unless authorised for permanent baiting treatments].
- Do not use this product in pulsed baiting treatments.
- Do not apply this product directly in the burrows.

[Not relevant in ES]:

Additional specific risk mitigation measures for permanent baiting:

- Permanent baiting is strictly limited to sites with a high potential for reinvasion when other methods of control have proven insufficient.
- The permanent baiting strategy shall be periodically reviewed in the context of integrated pest management (IPM) and the assessment of the risk for re-infestation.

2.4.7.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait points close to surface waters (e.g. rivers, ponds, water channels, dykes, irrigation ditches) or water drainage systems, ensure that bait contact with water is avoided.

2.4.7.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.7.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.4.8 Use 8 – Brown Rats – trained professionals – Outdoor open areas & waste dumps

Product Type(s)	14
Where relevant, an exact description of the use	Not relevant for rodenticides
Target organism(s) (including development stage)	Rattus norvegicus (brown rats)
Field(s) of use	Outdoor open areas Outdoor waste dumps
Application method(s)	Ready-to-use bait to be used in tamper-resistant bait stations, in sachets or as loose grain
Application rate(s) and frequency	Rats: bait boxes with 100-200 g per baiting point. more than one bait station is needed, the minimum distance Burrow: 200 g of bait per burrow only inside of tamper resistant baiting stations.
	Not relevant in ES]:

	Permanent baiting
Category(ies) of users	Trained professionals
Pack sizes and packaging material	Minimum pack size of 3 kg.
	Number of packed bags per packaging: up to 30 kg. Grams/kg of bait per packed bag: individual sachets of 10 to 100 g Packaging material: Bags, sacks, Buckets, Tubes, Bottles and Sachets. Material: Carton + PET OR LDPE, PE or PP or PET or LDPE or PET / PET MET / PE or PET / ALU / PE or PET / PE or PA / PE, HDPE, PVC. Furthermore, the product can be supplied as loose grain directly inside the secondary packaging mentioned above. In this case, the maximum pack size is 10kg.

2.4.8.1 Use-specific instructions for use

- Protect bait from the atmospheric conditions. Place the bait stations in areas not liable to flooding.
- Replace any bait in baiting points in which bait has been damaged by water or contaminated by dirt.
- Remove the remaining product at the end of treatment period (except when directly applied to burrows inside of tamper resistant baiting stations).
- Baits must be placed to minimise the exposure to non-target species and children.
- Cover or block the entrances of baited burrows to reduce the risks of bait being rejected and spilled-Follow any additional instructions provided by the relevant code of best practice [Not relevant in ES]:

Additional specific instruction of use for permanent baiting:

- Where possible, it is recommended that the treated area is revisited every 4 weeks at the latest in order to avoid any selection of a resistant population.
- [When available] Follow any additional instructions provided by the relevant code of best practice.

2.4.8.2 Use-specific risk mitigation measures

- Where possible, prior to the treatment inform any possible bystanders (e.g. users of the treated area and their surroundings) about the rodent control campaign
- To reduce risk of secondary poisoning, search for and remove dead rodents during treatment at frequent intervals, in line with the recommendations provided by the relevant code of best practice.
- Do not use this product as permanent baits for the prevention of rodent infestation or monitoring of rodent activities [unless authorised for permanent baiting treatments].
- Do not use this product in pulsed baiting treatments.
- Do not apply this product directly in the burrows.

[Not relevant in ES]:

Additional specific risk mitigation measures for permanent baiting:

- Permanent baiting is strictly limited to sites with a high potential for reinvasion when other methods of control have proven insufficient.
- The permanent baiting strategy shall be periodically reviewed in the context of integrated pest management (IPM) and the assessment of the risk for re-infestation.

2.4.8.3 Where specific to the use, the particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- When placing bait points close to surface waters (e.g. rivers, ponds, water channels, dykes, irrigation ditches) or water drainage systems, ensure that bait contact with water is avoided.

2.4.8.4 Where specific to the use, the instructions for safe disposal of the product and its packaging

-See section 2.5.4

2.4.8.5 Where specific to the use, the conditions of storage and shelf-life of the product under normal conditions of storage

-See section 2.5.5

2.5 General directions for use

2.5.1 Instructions for use

General Public:

- Read and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.
- Prior to the use of rodenticide products, non-chemical control methods (e.g. traps) should be considered.
- Remove food which is readily attainable for rodents (e.g. spilled grain or food waste). Apart from this, do not clean up the infested area just before the treatment, as this only disturbs the rodent population and makes bait acceptance more difficult to achieve.

- Bait stations should be placed in the immediate vicinity where rodent activity has been observed (e.g. travel paths, nesting sites, feedlots, holes, burrows etc.).
- Where possible, bait stations must be fixed to the ground or other structures.
- Do not open the sachets containing the bait.
- Place bait stations out of the reach of children, birds, pets, farm animals and other non-target animals.
- Place bait stations away from food, drink and animal feeding stuffs, as well as from utensils or surfaces that have contact with these.
- Do not place bait stations near water drainage systems where they can come into contact with water.
- When using the product do not eat, drink or smoke. Wash hands and directly exposed skin after using the product.
- Remove the remaining bait or the bait stations at the end of the treatment period.

Professionals:

- Read and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.
- Carry out a pre-baiting survey of the infested area and an on-site assessment in order to identify the rodent species, their places of activity and determine the likely cause and the extent of the infestation.
- Remove food which is readily attainable for rodents (e.g. spilled grain or food waste). Apart from this, do not clean up the infested area just before the treatment, as this only disturbs the rodent population and makes bait acceptance more difficult to achieve.
- The product should only be used as part of an integrated pest management (IPM) system, including, amongst others, hygiene measures and, where possible, physical methods of control.
- Consider preventive control measures (e.g. plug holes, remove potential food and drinking as far as possible) to improve product intake and reduce the likelihood of reinvasion.
- Bait stations should be placed in the immediate vicinity of places where rodent activity has been previously observed (e.g. travel paths, nesting sites, feedlots, holes, burrows etc.).
- Where possible, bait stations must be fixed to the ground or other structures.
- Bait stations must be clearly labelled to show they contain rodenticides and that they must not be moved or opened (see section 5.3 for the information to be shown on the label).

- When the product is being used in public areas, the areas treated should be marked during the treatment period and a notice explaining the risk of primary or secondary poisoning by the anticoagulant as well as indicating the first measures to be taken in case of poisoning must be made available alongside the baits.
- Bait should be secured so that it cannot be dragged away from the bait station.
- Place the product out of the reach of children, birds, pets and farm animals and other non-target animals.
- Place the product away from food, drink and animal feeding stuffs, as well as from utensils or surfaces that have contact with these.
- When using the product do not eat, drink or smoke. Wash hands and directly exposed skin after using the product.
- If bait uptake is low relative to the apparent size of the infestation, consider the replacement of bait stations to further places and the possibility to change to another bait formulation.
- If after a treatment period of 35 days baits are continued to be consumed and no decline in rodent activity can be observed, the likely cause has to be determined. Where other elements have been excluded, it is likely that there are resistant rodent so consider the use of a non-anticoagulant rodenticide, where available, or a more potent anticoagulant rodenticide. Also consider the use of traps as an alternative control measure.
- Remove the remaining bait or the bait stations at the end of the treatment period.
- Bait in sachets: Do not open the sachets containing the bait.
- -Loose grain: Place the bait in the baiting point by using a dosage devise. Specify the methods to minimise dust (e.g. wet wiping).

Trained professionals:

- Read and follow the product information as well as any information accompanying the product or provided at the point of sale before using it.
- Carry out a pre-baiting survey of the infested area and an on-site assessment in order to identify the rodent species, their places of activity and determine the likely cause and the extent of the infestation.
- Remove food which is readily attainable for rodents (e.g. spilled grain or food waste). Apart from this, do not clean up the infested area just before the treatment, as this only disturbs the rodent population and makes bait acceptance more difficult to achieve.
- The product should only be used as part of an integrated pest management (IPM) system, including, amongst others, hygiene measures and, where possible, physical methods of control.

- The product should be placed in the immediate vicinity of places where rodent activity has been previously explored (e.g. travel paths, nesting sites, feedlots, holes, burrows etc.).
- Where possible, bait stations must be fixed to the ground or other structures.
- Bait stations must be clearly labelled to show they contain rodenticides and that they must not be moved or opened (see section 5.3 for the information to be shown on the label).
- -When the product is being used in public areas, the areas treated should be marked during the treatment period and a notice explaining the risk of primary or secondary poisoning by the anticoagulant as well as indicating the first measures to be taken in case of poisoning must be made available alongside the baits.
- Bait should be secured so that it cannot be dragged away from the bait station.
- Place the product out of the reach of children, birds, pets and farm animals and other non-target animals.
- Place the product away from food, drink and animal feeding stuffs, as well as from utensils or surfaces that have contact with these.
- -Wear protective chemical resistant gloves during product handling phase (glove material to be specified by the authorisation holder within the product information).
- When using the product do not eat, drink or smoke. Wash hands and directly exposed skin after using the product.
- The frequency of visits to the treated area should be at the discretion of the operator, in the light of the survey conducted at the outset of the treatment. That frequency should be consistent with the recommendations provided by the relevant code of best practice.
- If bait uptake is low relative to the apparent size of the infestation, consider the replacement of bait points to further places and the possibility to change to another bait formulation.
- If after a treatment period of 35 days baits are continued to be consumed and no decline in rodent activity can be observed, the likely cause has to be determined. Where other elements have been excluded, it is likely that there are resistant rodent so consider the use of a non-anticoagulant rodenticide, where available, or a more potent anticoagulant rodenticide. Also consider the use of traps as an alternative control measure.
- Bait in sachets: Do not open the sachets containing the bait
- Loose grain: Place the bait in the baiting point by using a dosage devise. Specify the methods to minimise dust (e.g. wet wiping).

2.5.2 Risk mitigation measures:

General Public:

- Consider preventive control measures (plug holes, remove potential food and drinking as far as possible) to improve product intake and reduce the likelihood of reinvasion.
- Do not use anticoagulant rodenticides as permanent baits (e.g. for prevention of rodent infestation or to detect rodent activity).
- The product information (i.e. label and/or leaflet) shall clearly show that:
 - The product shall be used in adequate tamper resistant bait stations (e.g. "use in tamper resistant bait stations only").
 - Users shall properly label bait stations with the information referred to in section 5.3 of the SPC (e.g. "label bait stations according to the product recommendations").
- Using this product should eliminate rodents within 35 days. The product information (i.e. label and/or leaflet) shall clearly recommend that in case of suspected lack of efficacy by the end of the treatment (i.e. rodent activity is still observed), the user should seek advice from the product supplier or call a pest control service.
- Search for and remove dead rodents during treatment, at least as often as bait stations are inspected.
- Dispose dead rodents in accordance with local requirements [The method of disposal shall be described specifically in the national SPC and be reflected on the product label].

Professionals:

- Where possible, prior to the treatment inform any possible bystanders (e.g. users of the treated area and their surroundings) about the rodent control campaign
- To reduce risk of secondary poisoning, search for and remove dead rodents at frequent intervals during treatment (e.g. at least twice a week).
- Products shall not be used beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Do not use baits containing anticoagulant active substances as permanent baits for the prevention of rodent infestation or monitoring of rodent activities.
- The product information (i.e. label and/or leaflet) shall clearly show that:

the product shall not be supplied to the general public (e.g. "for professionals only").

the product shall be used in adequate tamper resistant bait stations (e.g. "use in tamper resistant bait stations only").

users shall properly label bait stations with the information referred to in section 5.3 of the SPC (e.g. label bait stations according to the product recommendations")

- Using this product should eliminate rodents within 35 days. The product information (i.e. label and/or leaflet) shall clearly recommend that in case of suspected lack of efficacy by the end of the treatment (i.e. rodent activity is still observed), the user should seek advice from the product supplier or call a pest control service
- Do not wash the bait stations with water between applications.
- Dispose dead rodents in accordance with local requirements [The method of disposal shall be described specifically in the national SPC and be reflected on the product label]

Trained Professionals:

- Where possible, prior to the treatment inform any possible bystanders about the rodent control campaign
- The product information (i.e. label and/or leaflet) shall clearly show that the product shall only be supplied to trained professional users holding certification demonstrating compliance with the applicable training requirements (e.g. "for trained professionals only".
- Do not use in areas where resistance to the active substance can be suspected.
- Products shall not be used beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment
- Do not rotate the use of different anticoagulants with comparable or weaker potency for resistance management purposes. For rotational use, consider using a non-anticoagulant rodenticide, if available, or a more potent anticoagulant.
- Do not wash the bait stations or utensils used in covered and protected bait points with water between applications.
- Dispose dead rodents in accordance with local requirements [The method of disposal shall be described specifically in the national SPC and be reflected on the product label].

2.5.3 Particulars of likely direct or indirect effects, first aid instructions and emergency measures to protect the environment

- This product contains an anticoagulant substance. If ingested, symptoms, which may be delayed, may include nosebleed and bleeding gums. In severe cases, there may be bruising and blood present in the faeces or urine.

- Antidote: Vitamin K1 administered by medical/veterinary personnel only.
- In case of:
- Dermal exposure, wash skin with water and then with water and soap.
- Eye exposure, always check for and remove contact lenses, rinse eyes with eyes-rinse liquid or water, keep eyes lids open at least 10 minutes.
- Oral exposure, rinse mouth carefully with water. Never give anything by mouth to unconscious person. Do not provoke vomiting. If swallowed, seek medical advice immediately and show the product's container or label [insert country specific information]. Contact a veterinary surgeon in case of ingestion by a pet [insert country specific information]
- Bait stations must be labelled with the following information: "do not move or open"; "contains a rodenticide"; "product name or authorisation number"; "active substance(s)" and "in case of incident, call a poison centre [insert national phone number]"
- Hazardous to wildlife.

2.5.4 Instructions for safe disposal of the product and its packaging

- At the end of the treatment, dispose the uneaten bait and the packaging in accordance with local requirements [The method of disposal shall be described specifically in the national SPC and be reflected on the product label].
- Use of gloves is recommended.

2.5.5 Conditions of storage and shelf-life of the product under normal conditions of storage

- Store in a dry, cool and well ventilated place. Keep the container closed and away from direct sunlight.
- Store in places prevented from the access of children, birds, pets and farm animals.
- Shelf life: two years

2.5.6 Other information

- Because of their delayed mode of action, anticoagulant rodenticides take from 4 to 10 days to be effective after consumption of the bait.
- Rodents can be disease carriers. Do not touch dead rodents with bare hands, use gloves or use tools such as tongs when disposing them.
- This product contains a bittering agent and a dye.

3 Assessment of the product

3.1 Use(s) considered appropriate for authorisation after former assessment (uses authorized by Spain)

3.1.1 Use 1 – House mice and/or brown rats – general public– indoor

Product Type(s)	14
Where relevant, an exact description of the use	Rodenticide
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	Indoors
Application method(s)	The biocidal product is a ready to use grain bait (in sachets or loose)
Application rate(s) and frequency	For rats , each bait point usually contains up to 100g of bait and it should be placed in 10 m2 depending on the level of infestation.
	For mice each bait point usually contains up to 50g of bait and it should be placed 10 m2 depending on the level of infestation.
Category(ies) of users	General public
Pack sizes and packaging material	 Loose grain: Bag or sack (Sachet): Description: Prefabricated bags or serial production bags, both thermal-welded Material: PE or PP or PET or LDPE or PET/PET MET/PE or PET/ALU/PE or PET/PE or PA/ PE. Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Plastic bucket/tub Description: Rectangular or conical bucket sealed Material: HDPE or PE or PP Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Bottle Description: Conical bottle sealed Material: HDPE or PE or PP or PET or PVC Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Carton Sachet: Description: Prefabricated bags or serial production bags, both thermal-welded Material:Tektura (kind of carton) + PET or LDPE Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Grain in sachets: individual polypropylene or polyethylene sachets each containing 10, 20, 25 or 50g.

	Bag or sack (Sachet):
	escription: Prefabricated bags or serial production bags, both
tr	ermal-welded
	laterial: PE or PP or PET or LDPE or PET/PET MET/PE or
P	ET/ALU/PE or PET/PE or PA/ PE.
	ontents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g
a	nd 1kg
	Paper Bag:
	escription: Prefabricated bags or serial production bags, either sewn
0	r glued.
C	ontents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g
a	nd 1kg
	Cardboard box:
D	escription: Self-assembly cardboard box with sealed or glued flaps
C	ontents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g
a	nd 1kg
	Plastic bucket
D	escription: Rectangular or conical bucket sealed
N	aterial: HDPE
C	ontents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g
a	nd 1kg

3.1.2 Use 2 - House mice and/or brown rats - professional- indoors

Product Type(s)	14
Where relevant, an exact description of the use	Rodenticide
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	indoors
Application method(s)	The biocidal product is a ready to use grain bait (in sachets or loose)
Application rate(s) and frequency	For rats , each bait point usually contains up to 100g of bait and it should be placed in 10 m2 depending on the level of infestation.
	For mice each bait point usually contains up to 50g of bait and it should be placed 10 m2 depending on the level of infestation.
Category(ies) of users	Professional
Pack sizes and packaging material	Loose grain: Bag or sack (Sachet): Description: Prefabricated bags or serial production bags, both thermal-welded Material: PE or PP or PET or LDPE or PET/PET MET/PE or PET/ALU/PE or PET/PE or PA/ PE. Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Plastic bucket/tub Description: Rectangular or conical bucket sealed Material: HDPE or PE or PP

Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Bottle
Description: Conical bottle sealed
Material: HDPE or PE or PP or PET or PVC
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Carton Sachet:
Description: Prefabricated bags or serial production bags, both
thermal-welded
Material:Tektura (kind of carton) + PET or LDPE
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg
Grain in sachets: individual polypropylene or polyethylene sachets each containing 10, 20, 25 or 50g. Bag or sack (Sachet):
Description: Prefabricated bags or serial production bags, both
thermal-welded
Material: PE or PP or PET or LDPE or PET/PET MET/PE or
PET/ALU/PE or PET/PE or PA/ PE.
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g and 1kg • Paper Bag:
Description: Prefabricated bags or serial production bags, both sewn
or glued.
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g and 1kg Cardboard box:
Description: Self-assembly cardboard box with sealed or glued flaps
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400 and 500g
and 1kg
· Plastic bucket
Description: Rectangular or conical bucket sealed
Material: HDPE
Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, d 500g and
1kg

3.1.3 Use 3 – House mice and/or brown rats – trained professional-indoors

Product Type(s)	14
Where relevant, an exact description of the use	Rodenticide
Target organism(s) (including development stage)	Mus musculus (house mice) Rattus norvegicus (brown rats)
Field(s) of use	indoors
Application method(s)	The biocidal product is a ready to use grain bait (in sachets or loose)
Application rate(s) and frequency	For rats , each bait point usually contains up to 100g of bait and it should be placed in 10 m2 depending on the level of infestation.
	For mice each bait point usually contains up to 50g of bait and it should be placed 10 m2 depending on the level of infestation.

0-1() -1	Trained Destauries at
Category(ies) of users	Trained Professional
Pack sizes and packaging material	Loose grain: The maximum capacity of the packages is restricted to 10kg. When greater capacity packaging marketed, the content of those have to be divided into bags weighing 10kg or less each. Bag or sack (Sachet):
	Description: Prefabricated bags or serial production bags, both thermal-welded
	Material: PE or PP or PET or LDPE or PET/PET MET/PE or PET/ALU/PE or PET/PE or PA/ PE .
	Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Plastic bucket/tub
	Description: Rectangular or conical bucket sealed Material: HDPE or PE or PP
	Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg • Bottle
	Description: Conical bottle sealed
	Material: HDPE or PE or PP or PET or PVC
	Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg Carton Sachet:
	Description: Prefabricated bags or serial production bags, both thermal-welded
	Material:Tektura (kind of carton) + PET or LDPE Contents (Net weight): 50, 90, 100, 150, 200, 250, 300, 400, 500 g and 1, 2, 2.5, 3, 5, 10, 15, 20, 25 and 30kg
	• Grain in sachets: individual polypropylene or polyethylene sachets each containing 10, 20, 25 or 50g.
	Bag or sack (Sachet): Description: Prefabricated bags or serial production bags, both thermal-welded
	Material: PE or PP or PET or LDPE or PET/PET MET/PE or PET/ALU/PE or PET/PE or PA/ PE.
	Contents (Net weight): 500g and 1, 2, 3, 5, 10, 15, 20, 25 and 30kg. - Paper Bag:
	Description: Prefabricated bags or serial production bags, both sewn or glued.
	Contents (Net weight): 500g and 1, 2, 3, 5, 10, 15, 20, 25 and 30kg. Cardboard box:
	Description: Self-assembly cardboard box with sealed or glued flaps Contents (Net weight): 500g and 1, 2, 3, 5, 10, 15, 20, 25 and 30kg. Plastic bucket
	Description: Rectangular or conical bucket sealed Material: HDPE
	Contents (Net weight): 500g and 1, 2, 3, 5, 10, 15, 20, 25 and 30 Kg.

3.2 Physical, chemical and technical properties

See AGRORAT BD-3 physical, chemical and technical properties evaluation.

3.3 Physical hazards and respective characteristics

See AGRORAT BD-3 physical hazards evaluation.

3.4 Methods for detection and identification

See AGRORAT BD-3 analytical methods evaluation.

3.5 Efficacy against target organisms

See AGRORAT BD-3 efficacy evaluation

3.6 Risk assessment for human health

3.6.1 Assessment of effects of the active substance on human health

See AGRORAT BD-3 Risk assessment for human health evaluation.

3.6.2 Assessment of effects of the product on human health

See AGRORAT BD-3 Risk assessment for human health evaluation.

3.6.3 Exposure assessment

See AGRORAT BD-3 Exposure assessment evaluation.

3.6.4 Risk characterisation for human health

See AGRORAT BD-3 Risk characterisation for human health evaluation.

3.7 Risk assessment for animal health

See AGRORAT BD-3 Risk assessment for animal health evaluation.

3.8 Risk assessment for the environment

See AGRORAT BD-3 Risk assessment for the environment evaluation

3.9 Assessment of a combination of biocidal products

A use with other biocidal products is not intended.

3.10 Comparative assessment

As bromadiolone is a Candidate for Substitution, a comparative assessment must be carried out as part of the evaluation process.

The Biocidal Products Committee of the European Chemicals Agency published its Opinion on Questions regarding the comparative assessment of anticoagulant rodenticides on 02 March 2017 (Document no. ECHA/BPC/145/2017).

The Decision states that:

- In the absence of anticoagulant rodenticides, the use of rodenticide biocidal products containing other active substances would lead to an inadequate chemical diversity to minimize the occurrence of resistance in the target harmful organisms. These products also show some significant practical or economical disadvantages for the relevant uses.
- There is insufficient scientific evidence to prove that non-chemical alternative methods of rodent control are sufficiently effective according to the criteria established in agreed Union guidance with a view to prohibit or restrict the authorised uses of anticoagulant rodenticides.

The Decision forms the basis of the COMMISSION IMPLEMENTING DECISION (EU) 2017/1532 of 7 September 2017 addressing questions regarding the comparative assessment of anticoagulant rodenticides in accordance with Article 23(5) of Regulation (EU) No 528/2012 of the European Parliament and of the Council.

On the basis of this comparative assessment, the authorisation of rodenticide products containing bromadiolone is justified.

4 Confidential annex (Access level: "Restricted" to applicant and authority)

This product is identical to AGRORAT BD-3. A letter of access has been submitted in order to use the information/data.