

**Information obtained during the consultation on potential candidates for substitution from 16/09/2021 until 15/10/2021.**

**Substance name:** Hexaflumuron (ISO) 1-(3,5-dichloro-4-(1,1,2,2-tetrafluoroethoxy)phenyl)-3-(2,6-difluorobenzoyl) urea

**Product type:** 18

**Intended use:** Used as a termiticide in ready-to-use baits and cellulose-based bait for protection of terrains (e.g. gardens, parks, fields, avenues and landscaping) and structures (e.g. houses, apartments, studios, mansions, chateaux, churches, restaurants, hotels, business premises, public and community buildings)

**EC number:** 401-400-1

**CAS number:** 86479-06-3

**eCA:** GR

<b>Comment 1</b>	<b>2021/09/16 17:58</b>
Country	Germany
Name of organization/institution	AlzChem Trostberg GmbH
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We, AlzChem Trostberg GmbH, are manufacturer of active substance "Hexaflumuron"
Product Type	18
<b>Alternative Identity and Properties</b>	We do not have information of any alternatives to this effective termite control
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	not relevant
Information above is confidential	

Justification for confidentiality	
<b>Economic Feasibility</b>	not relevant
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Any other chemical that has been used before or alternatively would pose an increased risk to the environment.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	No known alternative available
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	No known alternative available
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	As a manufacturer we want to highlight that the handling of raw material, product and waste streams are under strict control. Possible emissions are controlled and minimized according to German "Immissionsschutzgesetz" and closely monitored by authority. Therefore no unreasonable risk is to be expected from manufacturing.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 2</b>	<b>2021/09/23 11:53</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	<p>Accompagnement à la mise en oeuvre des solutions SENTRI TECH à base d'Hexaflumuron par le distributeur LIPHATECH via des formations, des séminaires et des contrôles qualités assurant le professionnalisme et le respect des conditions d'emploi des équipes utilisant ces produits en France.</p> <p>Gestion des déchets à base d'Hexaflummuron assurés par SENTRI TECH (appats consommés et stations plastifiées)</p> <p>Contact limitée avec les matières actives car les formulations sont protégées et prêtes à l'emploi.</p> <p>L'applicateur manipule très peu les produits et limite le contact. La Formulation prête à l'emploi et son recyclage limite l'impact environnemental (pas de dispersion et de produits restant en place dans l'environnement)</p>
Product Type	18
<b>Alternative Identity and Properties</b>	DIFLUBENZURON (Labyrinth + - diflubenzuron 0.5%, Labyrinth diflubenzuron 0.25%)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	OUI
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	OUI
Information above is	

confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Pour le Diflubenzuron, l'applicateur est en contact avec le produit (poudre volatile). Les stations sont difficiles à installer. La "Bouillie" de Diflubenzuron coule et n'est pas sécurisée. Dispersion du produit dans l'environnement. Délai d'élimination des termites extrêmement long voir impossible. Manque de formation et de suivi de la part du Distributeur Ensystemex
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OUI
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	La méthode piège alternative au DIFLUBENZURON n'est pas concluante vis-à-vis de l'efficacité recherchée et est particulièrement non respectueuse de l'environnement et de la santé de l'applicateur (poudre volatile, bouillie liquide...). L'applicateur a trop de contact et de manipulation de la matière active. Pas de gestion de déchets prévues pour le Diflubenzuron.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	L'HEXAFLUMURON est la meilleure solution pour le traitement des termites et pour le respect de l'environnement notamment grâce à la gestion des déchets prévue par le fabricant.
Information above is confidential	
Justification for confidentiality	
References	Publication scientifique du FCBA, du professeur SU et de Thomas CHOUVENC et de Simon DUPONT
Attachments (non-	

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 3</b>	<b>2021/09/24 12:28</b>
Country	France
Name of organization/institution	LIPHATECH
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	I would like explain that the termites problematics in France is very important in south of France. The hexaflumuron is main Active substance use in France and UE . The technologie is alone solution for all subtarrean termites in France and other region like to martinique, Guadeloupe and la Reunion on the tropical termite. This product is always use by professional technician it's very good thing because the general public don't use that limit the risks of bad use. one good prove is "excell certification" that garanty non toxicity when we use product.
Product Type	18
<b>Alternative Identity and Properties</b>	At this time in UE, there are'nt a real good alternative because the only bait other solution is exterra and this one isn't efficient on the all termite in UE particularly in antilles and Reunion on the tropical termites. Other alternative is a chimical barrier, we don't compare with bait because I think that not a real solution put chemical liquid in the wall.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	This process is only use with professionnall of pest control operators and it's a real garanty tu use this. The technical team are trained every years, that very important for the good praticies.

Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	For the global economic, that a big problem to have only one bait technologie in UE.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	To keep on the market with only one bait and chiminal treatment in the wall will be bad news for all
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	hexaflumron and more precisly the sentri tech process is on market since mors 25 ans, the prove isn't to do
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	I think we have nothing other natural alternative and we need to keep the active substance in the market. the other active substance diflubenzuron or fipronil don't efficient for all termite in UE. To summarize I think it's necessary to keep Sentri TECH process on the market because there are'nt other good alternative.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-	

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 4</b>	<b>2021/09/27 17:02</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is	

confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	Plagiser Documento defensa Hexaflumuron.pdf
Justification for confidential attachment	

<b>Comment 5</b>	<b>2021/09/28 14:00</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18



<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	

Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS Hexaflumurón.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 6</b>	<b>2021/09/29 11:31</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumurón es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	

Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS PARA CONSULTA_irr_2.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 7</b>	<b>2021/09/29 14:08</b>
Country	Réunion

Name of organization/institution	PANGA KARIA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We do termite treatments in La Reunion Island
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Non permanent baiting is possible, it is the best efficacy / low exposure way
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Other chitin shynthesis inhibitors are not yet registered in Europe on our local species. Fipronil is registered.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	We prefer baiting but NON permanent baiting.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Chlorfluazuron is used in Australia and Mauritius on the same species
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	We use non permanent baiting with hexaflumuron with good results
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 8</b>	<b>2021/09/30 09:17</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential.
Information above is confidential	

Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 9</b>	<b>2021/09/30 13:56</b>
Country	Portugal
Name of organization/institution	Companhia Europeia de Desinfecções, Lda
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information.
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	Comentário ECCHA.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 10</b>	<b>2021/09/30 14:02</b>
Country	Réunion
Name of organization/institution	BOURBON HYGIENE SERVICES
I do not wish the name of my organisation/institution to be published on the ECHA	



website.	
General information	We do termite treatments in La Reunion Island
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Non permanent baiting is possible, it is the best efficacy / low exposure way
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Other chitin shynthesis inhibitors are not yet registered in Europe on our local species. Fipronil is registered.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	We prefer baiting but NON permanent baiting.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Chlorfluazuron is used in Australia and Mauritius on the same species
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable
Information above is confidential	

Justification for confidentiality	
<b>Other comments</b>	We use non permanent baiting with hexaflumuron with good results
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 11</b>	<b>2021/10/01 14:23</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	

Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS PARA CONSULTA_irr_2.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 12</b>	<b>2021/10/04 10:26</b>
Country	Réunion

Name of organization/institution	LABORATOIRES SUBLIMM 974
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We do termite treatments in La Reunion Island
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Non permanent baiting is possible, it is the best efficacy / low exposure way
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Other chitin shynthesis inhibitors are not yet registered in Europe on our local species. Fipronil is registered.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	We prefer baiting but NON permanent baiting.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Chlorfluazuron is used in Australia and Mauritius on the same species
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	We use non permanent baiting with hexaflumuron with good results
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 13</b>	<b>2021/10/04 16:44</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in France. Hexaflumuron is not usefu in permanent baiting.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	

<b>Technical Feasibility</b>	Same as hexaflumuron
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Good.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 14</b>	<b>2021/10/04 17:16</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	My company has been operating in the Bordeaux area. We have been doing termite treatments for 20 years under the FCBA certification. During 20 years permanent baiting was not allowed and it should be removed from hexaflumuron registration.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	OK.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Since 20 years ago we use the diflubenzuron termite bait that is under BPR registration and FCBA certified. Our staff is trained and takes care of the product usage guidelines.

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Yes. 2 distributors in France for the diflubenzuron baits.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable for us over the last 20 years.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	I did not understand why hexaflumuron users moved to permanent baiting in 2015. This is not what is expected in the 2014 active substance approval document. Also this is not professional as long as we are supposed to reduce the amount of biocides used.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 15</b>	<b>2021/10/04 19:11</b>
Country	France



I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We have been using hexaflumuron for 15 years and moved to other active ingredients 10 years ago. We are happy to not use hexaflumuron
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Easy to use. Technics are described in CTBA+ certification documents.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Good.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Injections technics have moved in order to reduce the amount of liquid on the site. I don't agree with permanent baiting usage descibed in FCBA docs.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability</b>	Alternatives helped us to show a better environmental

<b>and availability of the alternative</b>	responsability image.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting with hexaflumuron is a shame for the professional pest control image.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 16</b>	<b>2021/10/05 09:29</b>
Country	France
Name of organization/institution	SAPA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please bann permanent baiting with this PBT active. Our company is the leader in France about termite treatments. We employ 150 people who are dedicated to building preservation and the protection of buildings against termites is one of our main businesses. Since 1964 wa have done thousands of termite treatments.Hexaflumuron is used in permanent baiting in all in ground stations since 2015, whereas it has proven efficacy for termite elimination from 1995 to 2015. The supplier moved to permanent baiting in order to sell more bait. They asked the professional service

	companies to go less often on sites in order to get market shares. This permanent baiting use is not necessary for elimination and required around 10 times more active ingredient in the ground than what is done with other systems.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron, Chlorfenapyr, Alpha-cypermethrin, Permethrin, Cyperméthrin, Acetamiprid. All registered in PT18.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	The alternative products can be used either for baiting (diflubenzuron) or liquid treatment. These techniques are known and practised by the professional companies since more than 20 years.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are not more expensive than with hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in continental Europe.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting done with hexaflumuron is not necessary for efficacy. It does not eliminate the termite colonies faster and exposes the building to higher risks than with non permanent baiting or liquid injections.
Information above is confidential	
Justification for confidentiality	
References	AMM n° FR2016-1029, AMM FR2019-0065, FR2017-0004
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 17</b>	<b>2021/10/05 10:48</b>
Country	France
Name of organization/institution	SOS TERMITES
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	I use hexaflumuron since many years, since I need to change my way of treatment for houses. Baits systems vs chemical injections are most "clean" for owners and occupiers.
Product Type	18

<b>Alternative Identity and Properties</b>	I've choose hexaflumuron because the mode of action based on an particular aspect of the biology of termites is rather more efficient than a chemical produce injected in the soils or in the masonry.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Bait system is more easy to handle than liquid chemical produces.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Bait system is more safe for PCO and environment.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	My company is located by the see, near an area of oysters production. Using bait system with hexaflumuron avoid to infiltrate produces could be dangerous for my very fragile environment. With hexaflumuron, I am sure to eliminate termites and not spend them to the neighborhood.
Information above is confidential	
Justification for confidentiality	

<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 18</b>	<b>2021/10/05 12:15</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	The current users of hexaflumuron do a permanent baiting use. It was not approved for in 2015.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Alternatives are widely used since 20 years ago and easy to use
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Same as technical. We have experience and are satisfied

	with the other products
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	The risks are lower with alternatives because the companies using hexaflumuron put it in all the in ground stations whereas it is not necessary (only 10% are needed). They also leave the biocides in the ground stations after the elimination of the termite
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	We have experience and are satisfied with the other products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable for us. We don't need hexaflumuron
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential	

attachment	
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<b>Comment 19</b>	<b>2021/10/05 12:30</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a termite treatment company in the south of France. We do around 50 termite jobs per year. We don't need hexaflumuron.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use Exterra termite baiting system. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	We have competitors but we manage to be competitive using diflubenzuron.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	We use Labyrinth+ that has the biocide registration. We control the volume of bait because we go on the sites more often and feed only the termite active stations.
Information above is confidential	
Justification for confidentiality	



<b>Availability</b>	Yes
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are suitable and available for our needs.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	I moved from hexaflumuron to diflubenzuron and I am happy with the current product.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 20</b>	<b>2021/10/05 15:22</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Stop permanent baiting with hexaflumuron
Product Type	18
<b>Alternative Identity and</b>	Diflubenzuron

<b>Properties</b>	
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Same as hexaflumuron
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	ok
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Good
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be restricted to non permanent baiting.
Information above is confidential	

Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 21</b>	<b>2021/10/05 15:25</b>
Country	France
Name of organization/institution	Ets LORILLOU
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Traitement contre les termites
Product Type	18
<b>Alternative Identity and Properties</b>	Barrière chimique avec fipronil
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Les alternatives ne fonctionnent pas aussi bien ou sont dangereuses pour les occupants et l'environnement, il est donc indispensable de conserver l'hexaflumoron. Interdiction du fipronil dans le sol.
Information above is confidential	
Justification for confidentiality	
References	Service des espaces verts de La Rochelle Referentiel A+
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 22</b>	<b>2021/10/05 17:23</b>
Country	France

Name of organization/institution	AGRO BIOCIDES CONSULT SAS
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	As termite consultant, I have been able to compare different solutions for termite control. This is a comparison between alternatives and hexaflumuron from efficacy stand point, worker exposure, damage to the structure due to treatment, price, environment exposure
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil (Termidor) Diflubenzuron (Labyrinth)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Termidor is used by drilling holes every 20 cm in the walls of the structure to be protected and injecting an insecticide solution that acts as a "chemical barrier" . When walls are made of very hard and dense material, it's difficult to drill and to inject liquid insecticide in sufficient quantity to be effective . Diflubenzuron is used as a termite bait in the same way as hexaflumuron but it is not technically feasible in all areas. It is not effective on tropical species such as <i>Coptotermes gestroi</i> , which is a very destructive species at La Reunion, and <i>heterotermes sp.</i> and <i>Nasutitermes sp.</i> in Guadeloupe and Martinique . Those species have been accidentally imported on continental Europe with tropical plants and could spread with the current increase of temperature. Diflubenzuron and fipronil are not certified for "interior atmosphere" such as nurseries and wine cellars whereas hexaflumuron has the "Excel Plus" certification confirming there is not organic volatile substances emitted .
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Price of a treatment with a "chemical barrier" with fipronil is economically feasible and in the same range as termite bait with hexaflumuron for the homeowner , but it does not

	include the cost of damage to the house with hundreds of holes drilled in the walls so altogether is much more expensive. Because of its destructive nature, it cannot be applied on cultural heritage. Termite bait with hexaflumuron is not destructive, Diflubenzuron treatment is economically feasible because there is competition with hexaflumuron. If it became the only termite bait available the price would increase significantly.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Considering 1 l per hole and 500 holes for an average house of 150 m <sup>2</sup> house, there is a need of 500 l of mix containing 0.2 % of Termidor = 1l of formulated product = 90 g of fipronil to protect a structure whereas there is only a need of est. 1 Kg of bait containing hexaflumuron containing 0.5% hexaflumuron to protect a structure = 5 g of hexaflumuron. Worker and environment exposure is much higher with 1 l of liquid Termidor classified H 302 H317 H373 (human tox) and H400 H410 (environment tox) than 1 kg of solid termite bait not classified for human tox and classified H410 for environment (see SDS in attachment) The Labyrinth formulation of diflubenzuron is packaged in a dust formulation that generates a lot of inhalation exposure for the worker during handling whereas formulations of hexaflumuron are either in briquettes (Recrute Pro) or in solid tube (Recrute HD) Labyrinth distributors do not handle the waste from the treatment (consumed bait, stations) that is only depending on the good will and consciousness of applicators whereas Hexaflumuron distributor do centralize all wastes and get them recycled by specialized company (Suez)
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the</b>	Alternative to hexaflumuron are not always suitable - fipronil in liquid termiticide result in 10 to 20 fold more

<b>alternative</b>	active ingredient spread in the environment, high worker exposure to a harmful product , and is expensive considering damages to the treated building due to injection holes - diflubenzuron is marketed in a dusty formulation increasing inhalation exposure, is not effective on the major tropical species present in the French oversea territories (Reunion and Caribbean islands). Distributors do not take care of waistes and it's not certified for sensitive environment
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Please find in attachment * SDS of Termidor (fipronil) * SDS of Recrute Pro (hexaflumuron) and Recrute HD (hexaflumuron) * Certification P+ of Recrute Pro on Reticulitermes sp. COptotermes a La Reunion and heterotermes and Nsutitermes in Guadeloupe , MARTinique and Guyana * Scheme of a chemical barrier (Copyright FCBA, extract of DQ CERT 14-339 ) * Excell plus certification of Recrute Pro (hexaflumuron) * picture of chamilal barrier application with fipronil * Picture of hexaflumuron termite bait in a bait station
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	<p>22_Attachment_Excell          hexaflumuron termite bait in its bait station</p> <p>22_Attachment_Picture of a curative treatment with a barrier on a structure attacked at ground floor</p> <p>22_Attachment_CTBP+ Recrute HD</p> <p>22_Attachment_FDS Recrute Pro</p> <p>22_Attachment_chemical barrier application with fipronil (FCBA)</p> <p>22_Attachment_hexaflumuron termite bait in its bait station</p> <p>22_Attachment_CTBP+ Recrute Pro</p> <p>22_Attachment_FDS Recrute HD</p> <p>22_Attachment_FDS-Termidor-SC_2021</p>
Attachments (confidential information)	

Justification for confidential attachment	
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<b>Comment 23</b>	<b>2021/10/05 18:23</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the</b>	



<b>alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Justification for confidential attachment	

<b>Comment 24</b>	<b>2021/10/06 12:24</b>
Country	Spain
Name of organization/institution	Corteva Agriscience
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	<p>Please refer to part IV. Attachments for complete information on the Public Consultation input by Corteva Agriscience: - Supportive information for the consultation on hexaflumuron (CAS No. 86479-06-3) as potential candidate for substitution: Main response document to the questions raised by eCA Greece regarding the Public Consultation process for hexaflumuron active substance renewal. -</p> <p>HEXAFLUMURON+CAS_+ART+75_+ART+89+DATA-1_ wd: First annex to main document. Potential chemical alternates available in the European market and their characteristics. Presented in excel file as suggested by Greece eCA. - Hexaflumuron Termite Control_February2020: Second annex to main document. Paper from Corteva Agriscience where the essentiality of</p>

	hexaflumuron for termite control in EU is explained. - FCBA 1 sept2021 Liste_antitermites_post-construction_CTBP+: Third annex to main document. Certification for biocides by the Technology Institute for all wood related topics (FCBA) for use in post-construction situations.
Product Type	18
<b>Alternative Identity and Properties</b>	<p>(please refer to the attached documents Supportive information for the consultation on hexaflumuron (CAS No. 86479-06-3) as potential candidate for substitution, sections 2 and 3; and Hexaflumuron Termite Control_February2020, section 4). Few insecticides undergoing the biocide approval process, or already listed in Annex I of the Biocide Directive 98/9 can be used for termite control. None of them can be used in all situations. Termite control methods can be divided in two classes: pre-construction methods and post-construction methods. Regarding post-construction methods, hexaflumuron mode of action belongs to the termite bait technology that has greater social acceptance versus chemical treatments. Insecticides used in termite baits are chitin synthesis inhibitor from the benzoylurea family that will only act on termites during the period of molting. In E.U., diflubenzuron (Annex I listed, E.I.F 1/02/2015) and hexaflumuron (Annex I listed, E.I.F 1/04/2017) are used in termite baiting with both active substances being approved at EU level under BPR. Nevertheless, only hexaflumuron is certified by the French FCBA Institute Technologique (<a href="https://ctbplus.fr/liste/antitermite.pdf">https://ctbplus.fr/liste/antitermite.pdf</a>) to be effective both on species of continental European termite species (Reticulitermes spp.) and tropical species like Coptotermes spp. Not having hexaflumuron available would render impossible to control all damaging species of termites using a bait technology. As there are no alternative substances available through this delivery method, the use of hexaflumuron is essential.</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	

<b>Economic Feasibility</b>	<p>(please refer to the attached documents Supportive information for the consultation on hexaflumuron (CAS No. 86479-06-3) as potential candidate for substitution, section 2; and Hexaflumuron Termite Control_February2020, section 3). Termites are very difficult to control and can cause high damage to private homes and historic buildings. These structures, if left untreated, would also cause big financial constraints since termite infested structures have a low market value and cause significant impact on society, where historical buildings are concerned. Examples of historic structures that have been treated with hexaflumuron are the Palace of Charles V (Granada) in 2018, the urban area of Villa del Río (Córdoba) in 2019 and Tacoronte (Canary Islands) in 2020, all of them in Spain; the Abbey of Fontfroide (Aude) in 2008, the Medieval Village of Monestiés (Tarn) in 2015 and the legendary music-hall Olympia, the Theatre Edouard VII, OECD building (Paris), all of them in France; and the historical centre of Bagnacavalli (Italy); among other treatments. Therefore, hexaflumuron can contribute to the maintenance of European national heritage.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>(please refer to the attached documents Hexaflumuron Termite Control_February2020, section 9). The high potential of damage of termites can cost billions of euros of damage on private habitat and cultural heritage, therefore the E.U. must keep its level of protection at the highest rate to avoid expanding the problem and to increase the cost of control. Termites that used to be localized in the Atlantic and Mediterranean coast of France, Spain and Italy in the</p>

	<p>past have reached cities like Paris and Hamburg. With climate change, there is no doubt that termites will tend to expand further North in Europe and that control measures must be reinforced. Another driving force for termite expansion is increasing global trade. Termites can easily generate a new colony with reproducers from a few insects in a piece of wood or in a pot plant. With millions of containers being loaded and unloaded in the E.U., and the increase of global plant exchanges, the introduction of invasive tropical termite species to the continental Europe is a scenario that cannot be ignored. By reducing means of termite control, it could soon become economically unfeasible for the E.U. to cope with termite infestations. The injection of high amounts of liquid insecticide inside buildings to control termites is a "technology of the past" that will gradually disappear in favor of termite baits which are friendlier for the environment, the homeowners of treated structures, and the applicators. Chemical barriers with contact insecticides are an alternative, yet likely to increase risks and hazards compared to termite baits. If hexaflumuron is not maintained on the market, there will be only one single active substance left to in termite baits: diflubenzuron. It is well documented that this active substance cannot be used against termites in some parts of the E.U. (the French overseas territories of La Reunion Guadeloupe, Martinique, and Guyana) because of its lack of efficacy on termites belonging to the Coptotermes species. Therefore, there would be no technically feasible alternative to hexaflumuron anywhere in the E.U. Moreover, the exposure to the active substance in termite bait is negligible and the quantities of hexaflumuron used as termite bait each year in the E.U. are minimal (range of 20 kg) in perspective of the service provided to more than 3000 structures being treated and protected. It would not be cautious for the E.U. to voluntarily decide to reduce its means of control, while termite pressure is increasing. Hexaflumuron has the best fit in termite bait in the E.U. because it can control all subterranean termites anywhere in the world. Therefore, it is essential to keep this active substance for this specific use.</p>
<b>Information above is confidential</b>	
<b>Justification for confidentiality</b>	
<b>Other comments</b>	<p>Please refer to part IV. Attachments for complete information on the Public Consultation input by Corteva Agriscience: - Supportive information for the</p>

	<p>consultation on hexaflumuron (CAS No. 86479-06-3) as potential candidate for substitution: Main response document to the questions raised by eCA Greece regarding the Public Consultation process for hexaflumuron active substance renewal. -</p> <p>HEXAFLUMURON+CAS_+ART+75_+ART+89+DATA-1_ wd: First annex to main document. Potential chemical alternates available in the European market and their characteristics. Presented in excel file as suggested by Greece eCA. - Hexaflumuron Termite Control_February2020: Second annex to main document. Paper from Corteva Agriscience where the essentiality of hexaflumuron for termite control in EU is explained. -</p> <p>FCBA 1 sept2021 Liste_antitermites_post-construction_CTBP+: Third annex to main document. Certification for biocides by the Technology Institute for all wood related topics (FCBA) for use in post-construction situations.</p>
Information above is confidential	
Justification for confidentiality	
References	Literature references are provided in the attached documents and are available upon request.
Attachments (non-confidential information)	<p>24_Attachment_3. FCBA 1 sept2021 Liste_antitermites_post-construction_CTBP+</p> <p>24_Attachment_0. Supportive information for the consultation on hexaflumuron (CAS No. 86479-06-3) as potential candidate for substitution</p> <p>24_Attachment_2. Hexaflumuron Termite Control_February2020</p> <p>24_Attachment_1. HEXAFLUMURON+CAS_+ART+75_+ART+89+DATA-1_ wd</p>
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 25</b>	<b>2021/10/06 12:51</b>
Country	France
Name of	ETABLISSEMENT LAMOLIE

organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Being an applicator Sentri Tech implies that the company respects the specifications and serious commitments in the implementation and monitoring of sites. Seminar training and follow-up by the LIPHATEC Waste management and regulations to ensure the professionalism of companies using these products in France. The permanent training of our employees as well as the follow-up of our sites by Lyphatec and Corteva make the SENTRI TECH system a success
Product Type	18
<b>Alternative Identity and Properties</b>	I have been using the SENTRI-TECH system since 1997 in France I was the first French to trust Lyphatec and CORDEVA. The product in place in our workstations is solid and my employees do not breathe powder like diflubenzuron (Labyrinth + ENSYSTEX EUROPE ). To date, we have successfully handled more than 4000 projects with a 100% customer satisfaction rate.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	

Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 26</b>	<b>2021/10/06 14:28</b>
Country	France
Name of organization/institution	NEOPROTEK
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Pest control company based in France

Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	OK.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Good.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be restricted to non permanent



	baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 27</b>	<b>2021/10/06 16:08</b>
Country	Spain
Name of organization/institution	ANEPROMA.ASOCIACION NACIONAL EMPRESAS PROTECCIÓN DE LA MADERA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	In Spain, various products are marketed for termite control that, to a greater or lesser extent, all of them can be considered alternatives to Hexaflumuron. -Pyrethroids for injection wood treatments. They can also be applied preventively. This section should also include Fenoxicarb. - Fipronil, formulated as a concentrated suspension for the realization of perimeter barriers in walls. Diflubenzuron in anti-termite bait systems. In this last section, the aforementioned Heaflumuron would be included. There are many works carried out in Spain with both growth regulators that have proven their effectiveness in solving the increasingly numerous problems caused by termites. Both in urban centers, in real estate and assets of cultural interest.

Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>Solving problems caused by termites involves taking action from different perspectives. One of them is the treatment through any of the sections listed in the previous point. And even sometimes it will be necessary to make use of the combination of several. As regards the bait systems impregnated in IGR, the theory on which all of them are based is to take advantage of the biology and habits of the termites to achieve the distribution of the inhibitor in the colony and achieve its control. Applying this premise and taking into account the species that we have installed in the peninsula, the results obtained with the systems that are commercialized are very similar. That is, with one or the other system, with Hexaflumuron or Diflubenzuron, as long as the guidelines of the action protocols provided by the manufacturers are followed, success will be achieved in controlling the pest. This assertion can be verified with the multitude of references that the applicator companies can provide, each one made with their preferred system due to other types of considerations that are not reliability and efficiency.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>Bait systems in the Sentri Tech (Hexaflumuron), Termigard and Labyrinth (Diflubenzuron) market are available to PCO's applicator companies, depending on the commercial strategies of each manufacturer or distribution company. In general, according to the data provided by the PCOs, the treatment costs are similar, varying in differences around 20%, depending on whether the product is manufactured or distributed.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>The handling of any chemical product, in addition to the usual precautions, requires the adoption of specific measures for use, which are a function of the dangerousness of the product being handled. The comparative danger for anti-termite bait systems must be</p>

	<p>found in the following comparative data of the active principles Hexaflumuron and Diflubenzuron. Regarding Persistence (DT50 12°C) HEXAFLUMURON 280 days VERY PERSISTENT DIFLUBENZURON 7.5 days NOT PERSISTENT Regarding Bioaccumulation HEXAFLUMURON 5600 days VERY BIOACCUMULABLE DIFLUBENZURON 320 days NOT BIOACCUMULABLE Regarding Toxicity (Daphnia NOEC) HEXAFLUMURON 0.0029 ug / l TOXIC DIFLUBENZURON 0.04 ug / l TOXIC As can be seen, the danger values range between 14 and 37 times lower than those of HEXAFLUMURÓN. In addition, the concentrations at which the active principles are found in the various formulations must be taken into account. In the case of Hexafljumuron it is 0.5%. In Labyrinth, Diflubenzuron is also formulated at 0.5%. In Termigard the Diflubenzuron is at 0.25%.</p>
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	<p>Any of the termite control bait systems can be purchased from the pest control market. It depends in each case on the marketing policies of the companies, whether they are manufacturers or distributors. The PCO companies must be registered with the ROESB and the applicator personnel must accredit their training through the corresponding applicator card.</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>According to the above, we consider that due to considerations of efficiency, economic character and accessibility to the product, there are effective and viable alternatives that guarantee less aggression to the environment and the environment to the use of Hexaflumuron</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	

Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 28</b>	<b>2021/10/06 17:59</b>
Country	Spain
Name of organization/institution	Sanitrade SLU
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would make impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Please refer to attached documents for further information
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Please refer to attached documents for further information
Information above is	

confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Please refer to attached documents for further information
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Please refer to attached documents for further information
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Please refer to attached documents for further information
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Please refer to attached documents for further information
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	Coments for renovation of hexaflumuron as tp18_ines rodriguez_202110.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 29</b>	<b>2021/10/06 19:07</b>
Country	Spain

Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	I send my comments to the hexaflumuron renovation process as an architect dealing with renovation of wood structural buildings. Please see attached document.
Product Type	18
<b>Alternative Identity and Properties</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability</b>	Please see attached document.

<b>and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Please see attached document.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS PARA CONSULTA SBG.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 30</b>	<b>2021/10/07 09:29</b>
Country	Spain
Name of organization/institution	Química de Munguía S.A.
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	Currently in the market, there are different alternatives to Hexaflumuron for termite control and protection of wooden structures from termite attack. .- Products for the treatment of wood, both preventive and curative once the wood is attacked by termites, innumerable formulations, both solvent and aqueous phase, ready to use or concentrates, liquids or gels, with efficacy and ten-year guarantee, are

	<p>currently registered according to 528/2012 in the EU based on Cypermethrin 65 products Permethrin 132 products Fenoxicarb 1 product .- Physical-chemical anti-termite barrier, ready for use used during the construction phase of a building. There are different companies that manufacture and distribute products that form a physical-chemical barrier that prevents the attack of termites on new constructions, they are polyethylene films impregnated with permethrin or deltamethrin and are registered in accordance with Regulation 528/2012. .- Preventive/curative product for injection into walls. There is a product registered according to regulation 528/2012 based on fipronil (Thermidor SC), with a proven effectiveness for years in the fight against termites .- Anti-termite baits. There are two companies that manufacture anti-antitermite baits with diflubenzuron that act in the same way (inhibitor of chitin synthesis), the products are registered under Regulation 528/2012 in the countries of the Mediterranean arc with termite attack problems. (Portugal, Spain, France, Italy and Greece). The comparison with hexaflumuron (also termite bait inhibitor of chitin synthesis) would be:</p> <table border="0" data-bbox="613 924 1445 1155"> <tr> <td></td> <td>Hexaflumuron</td> <td>Diflubenzuron</td> <td>Diflubenzuron/hexaflumuron ratio</td> </tr> <tr> <td>Concentration</td> <td>0,50%</td> <td>0,25%</td> <td></td> </tr> <tr> <td>Persistence DT50 12°C (days)</td> <td>280</td> <td>7,5</td> <td></td> </tr> <tr> <td>BCF Bioaccumulation</td> <td>37 times lower</td> <td>5600</td> <td>320</td> </tr> <tr> <td>Toxicity Daphnia NOEC</td> <td>0.0029 µg/l</td> <td>0.04 µg/l</td> <td>14 times lower *</td> </tr> </table> <p>* Data from the Assessments orf Inclusion From all the above, it is shown that there are different effective alternatives to without hexaflumuron, both molecules and treatment strategies to face the problem of termite attack. so its continuity (hexaflumuron) in the market is not justified, which would mean avoiding contamination with a PBT product of 3000 sites/year x 2360 m<sup>2</sup>/work x 1 m depth x 1.33 Tn/m<sup>3</sup> = 9.42 x 10<sup>6</sup> Tn ground/year.</p>		Hexaflumuron	Diflubenzuron	Diflubenzuron/hexaflumuron ratio	Concentration	0,50%	0,25%		Persistence DT50 12°C (days)	280	7,5		BCF Bioaccumulation	37 times lower	5600	320	Toxicity Daphnia NOEC	0.0029 µg/l	0.04 µg/l	14 times lower *
	Hexaflumuron	Diflubenzuron	Diflubenzuron/hexaflumuron ratio																		
Concentration	0,50%	0,25%																			
Persistence DT50 12°C (days)	280	7,5																			
BCF Bioaccumulation	37 times lower	5600	320																		
Toxicity Daphnia NOEC	0.0029 µg/l	0.04 µg/l	14 times lower *																		
Information above is confidential																					
Justification for confidentiality																					
<b>Technical Feasibility</b>	<p>Technically in the market there is a wide variety of available products, with different molecules and with four different strategies, for the fight and control of termites in the EU, these products have been used in the EU by the PCO for decades, so there is knowledge and widespread practice for their use, alternating the different strategies and even combining them according to the particular needs of the</p>																				



	work in question. The use of Hexaflumuron does not bring any novelty in terms of strategy or effectiveness that has not existed for decades available to the market and used by PCOs.																																
Information above is confidential																																	
Justification for confidentiality																																	
<b>Economic Feasibility</b>	The cheapest strategies for the fight against termite attack on wood are the preventive-curative treatment of wooden structures through products registered for that use as group 08, or preventively through the placement of physical-chemical barriers in pre-construction. Comparing with the same strategy of using cellulosic baits against termites, if we compare the cost of treatment of a house with hexaflumuron or diflubenzuron through our registered product TERMIGARD, according to the information transmitted to us by the different PCO, customers and non-customers is that with TERMIGARD, a similar and effective treatment can mean a saving of 20 – 25%. From an economic point of view, the maintenance of hexaflumuron on the market does not provide any advantage over the strategies and products currently available on the market, so the continuity of hexaflumuron is not justified from an economic point of view.																																
Information above is confidential																																	
Justification for confidentiality																																	
<b>Hazards and Risks of the Alternative</b>	<p>All products that exist for the anti-termite treatment according to the different strategies described are registered in different EU countries, in accordance with Regulation 528/2012 with insecticidal molecules included in Annex I without PBT classification. In the case of anti-termite baits it is easier to make the comparison with baits with diflubenzuron</p> <table border="0"> <thead> <tr> <th></th> <th>Diflubenzuron</th> <th>Diflubenzuron/hexaflumuron ratio</th> <th>Hexaflumuron</th> </tr> </thead> <tbody> <tr> <td>Concentration</td> <td>0,50%</td> <td>0,25%</td> <td>Persistence</td> </tr> <tr> <td>DT50 12°C (days)</td> <td>280</td> <td></td> <td>7,5</td> </tr> <tr> <td>37 times lower BCF Bioaccumulation</td> <td></td> <td></td> <td>5600</td> </tr> <tr> <td></td> <td></td> <td></td> <td>320</td> </tr> <tr> <td></td> <td></td> <td></td> <td>17 times lower Toxicity Daphnia</td> </tr> <tr> <td>NOEC</td> <td>0.0029 µg/l</td> <td></td> <td>0.04 µg/l</td> </tr> <tr> <td></td> <td></td> <td></td> <td>14 times lower</td> </tr> </tbody> </table> <p>There would be no justification for maintaining hexaflumuron, as there are effective alternatives that pose much less risk.</p>		Diflubenzuron	Diflubenzuron/hexaflumuron ratio	Hexaflumuron	Concentration	0,50%	0,25%	Persistence	DT50 12°C (days)	280		7,5	37 times lower BCF Bioaccumulation			5600				320				17 times lower Toxicity Daphnia	NOEC	0.0029 µg/l		0.04 µg/l				14 times lower
	Diflubenzuron	Diflubenzuron/hexaflumuron ratio	Hexaflumuron																														
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DT50 12°C (days)	280		7,5																														
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			320																														
			17 times lower Toxicity Daphnia																														
NOEC	0.0029 µg/l		0.04 µg/l																														
			14 times lower																														

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	The market has a wide variety of strategies in the fight against termites with multiple registered products available with several companies that manufacture and market these products in different EU countries. The disappearance of hexaflumuron would not cause any alteration in the market in terms of availability of products by PCO for the fight and control of termites.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Considering the information provided in the previous field, there are several alternatives currently on the market (registered and marketed) both from a technical point of view, availability, economic cost, Hazard and risks, which substantially improve products with hexaflumuron, so there is no justification for continuing with a product that meets the exclusion criteria clearly specified in the text of the BPR.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	BPR Regulation 528/2012 Hexaflumuron Assessment of inclusion Diflubenzuron Assessment of inclusion ECHA Europe page for molecules assessments and registrations in European countries
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 31</b>	<b>2021/10/07 09:41</b>
Country	France
Name of organization/institution	TERMITE D OC
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Pest control company based in France. Please stop hexaflumuron permanent baiting.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	ok
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	

<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	GOOD
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 32</b>	<b>2021/10/07 10:32</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	we do termite treatments in perpignan area. Permanent baiting with hexaflumuron must stop.
Product Type	18

<b>Alternative Identity and Properties</b>	Fipronil, diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	we have been trained by the supplier and regular audits are done on sites
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	we face low prices from hexaflumuron users due to permanent baiting.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	biocide approved
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	ok
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	good
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	since a few years we face competitors who use hexaflumuron as a permanent use on the sites and this is not useful and bad for the image of our sector.

Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 33</b>	<b>2021/10/07 12:24</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We have been using hexaflumuron years ago, did around 400 houses, and we have moved to diflubenzuron with Exterra. We are in a high termite pressure area (South West France) and permanent baiting is not necessary.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil and Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Easy to use
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No issues for working with the alternatives

Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Non permanent baiting technics help us to reduce the amount of active on the sites. We put bait in secured in ground stations and only if there are active termites.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	We did not face any issue when we stopped using hexaflumuron.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting with hexaflumuron is not useful. They don't have registration for the bait yet.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 34</b>	<b>2021/10/07 13:51</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En España se comercializan dos sistemas de cebos alternativos a Senti Tech que tiene como materia activa el Hexaflumuron. Son el sistema de Exterra y el de Quimunsa, ambos con la materia activa Diflubenzuron. La base teórica del funcionamiento de todos ellos es la misma. Inhibir la síntesis de la quitina en los insectos impidiendo la muda y conseguir que el producto se transmita a toda la colonia empleando celulosa impregnada. Serán las obreras que son las que se encargan de alimentar a los miembros de la colonia las que realicen la transmisión del producto. En algunos casos en los que las particularidades del problema así lo aconsejen, se utilizan los sistemas tradicionales de inyección de la madera con protectores y el cerramiento posterior con barreras perimetrales en los muros. Incluso en algunos casos es recomendable realizar tratamientos mixtos cebos – inyección.</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>Mediante la aplicación del Sistema Termigard, se pueden solucionar problemas de termitas tanto de índole individual o particular, como extensiones más amplias con graves daños provocados por estos insectos. Así podemos mencionar núcleos urbanos afectados en amplios sectores, como es el caso de Berantevilla (Álava) y Aiguafreda (Barcelona). Como edificios más representativos podemos especificar Masias Catalanes, Edificios Modernistas etc.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El empleo de TERMIGARD en las obras realizadas, nos ha



	<p>permitido ser competitivos con los precios de mercado de otros sistemas alternativos y a la vez poder certificar el éxito de los tratamientos en los que hemos intervenido. Hemos podido contar en todo momento con el apoyo del servicio técnico de la empresa fabricante que nos facilitó un protocolo de actuación sin coste alguno y sin exigirnos compromiso o contrato alguno.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>La manipulación del producto en base a Diflubenzuron es la correspondiente a cualquier producto químico paguicida. No difiere del resto de sistemas de cebos termiticidas. Incluso están también destinadas a evitar que los insectos puedan llegar a detectar cualquier manipulación extraña de los elementos del sistema y les genere desconfianza y rechazo.</p>
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	<p>El Sistema Termigard puede adquirirse como cualquier otro del catálogo de la empresa, siguiendo la metodología habitual, contactando con el comercial de la zona o bien directamente realizado el pedido a fábrica. Además, no se requiere ningún requisito adicional a la posesión de la autorización o documento que acredite la capacitación del personal aplicador y de la empresa PCO.</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Según nuestra experiencia, hemos podido comprobar que el uso de un producto en base cebo impregnado en Diflubenzurón (TERMIGARD), es una alternativa real y eficaz al empleo de otros sistemas similares de cebos con otras materias activas.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	

Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 35</b>	<b>2021/10/07 14:42</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a termite treatment company in the east of Spain. We are dedicated to building preservation and the protection of buildings against termites is one of our main businesses.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use a registered termite baiting system
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with hexaflumuron bait

Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Alternatives are suitable and viable for termite control companies in Spain
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and they have been approved under Biocide regulation
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron is used in permanent baiting in all in ground stations. This permanent baiting use is not necessary for elimination and required around 10 times more active ingredient in the ground than what is done with other systems. Hexaflumuron is considered a persistent, bioaccumulative and toxic substance and a very persistent and very bioaccumulative substance (Annex XIII to Regulation (EC) 1907/2006). Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 36</b>	<b>2021/10/07 17:45</b>
Country	Portugal
Name of organization/institution	TRULY CONTROL LDA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Reliable and effective technique.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Albeit the hexaflumuron bait it is not the most economical technique, it is effective, and also with far fewer environmental impacts in comparison with the chemical barrier technique.
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	The alternative is chemical barrier technique which implies large quantities of insecticide injected in a liquid form that have the potential of aquifer contamination
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS Hexaflumuron.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 37</b>	<b>2021/10/07 20:26</b>
Country	France
Name of organization/institution	BATI-TERMITES

I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison of hexaflumuron bait with chemical barrier with Termidor (9.6% fipronil)
Product Type	18
<b>Alternative Identity and Properties</b>	Termidor : 9.6% fipronil
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Chemical barrier with fipronil is not convenient to set up, more contact with product for the applicator, damage on building, structural risk on building
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Cost for applicator is lower for hexaflumuron because chemical barrier with fipronil require heavy equipment for the applicator,
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Worker exposure is higher with chemical barrier with fipronil because there is projection of liquid mix,
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	All products are available on the market
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Application with fipronil is more dangerous for the applicator, for the homeowner, . It is essential to keep hexaflumuron solution with bait that is more family and worker friendly
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 38</b>	<b>2021/10/07 20:47</b>
Country	France
Name of organization/institution	ARNOUST HYGIENE SERVICE
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison with chemical treatment by injection in the walls with fipronil solution
Product Type	18
<b>Alternative Identity and Properties</b>	Termidor 9,6 % fipronil (BASF)
Information above is	

confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Chemical treatment with fipronil solution is a lot of constraint for manipulation, to protect the soil, drilling holes in the walls every 20 cm
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Cost is higher with fipronil because labour time is very high to implement and efficacy is lower than with hexaflumuron bait because it is random application , not targeted at the termite colony . Sometime, product solution is injected in the wall but we don't know where the product is going.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Structure for the house can be weakened by the holes with injection . Homeowner need to leave the house during the application , and applicator is more exposed with a liquid insecticide (risk of splashing ) than with a solid bait with hexaflumuron. Application with hexaflumuron bait is not destructive for the house and not dangerous for the applicator and homeowner , and is easier to set up
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternative is available but is not suitable because implementation is more complex, it is increasing worker and owner exposure and efficacy is not as good on the long term because termites are not eliminated, they are just repelled , and as soon as they find a gap in the "chemical barrier" , they come back Hexaflumuroin bait eliminates the colony and reinfestation is very rare, and only in the soil stations in



	the perimeter
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 39</b>	<b>2021/10/08 10:03</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	I have been a professional in the pest control sector since 1991, I have worked and had responsibility in multinational companies in the sector for 20 years and currently I am a Technical Consultant in Xylophages for Pest Control companies
Product Type	18
<b>Alternative Identity and Properties</b>	For more than 25 years I have worked with various growth inhibiting active ingredients for subterranean termites. I have worked with Hexaflumuron and Diflubenzuron. Both active ingredients have been effective in eliminating termite

	mounds.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Currently the Diflubenzuron in products such as Labyrith and Labyrinth + and others is used in Europe for many years for the elimination of subterranean termite species that inhabit Europe. They are products with the ECHA European Registry, distributed in all European countries that have the subterranean termite problem. The cost is lower than Hexaflumuron .
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Taking into account all that has been said, I consider that there are perfectly viable alternatives from a technical and economic point of view to Hexaflumuron on the European market. To protect the environment, it is essential to eliminate from the market those products and active ingredients with a polluting capacity recognized by ECHA.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	There is no risk, since the Diflubenzuron used in products for the control of subterranean termites using baits, is authorized by ECHA and has its European Registers in force.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Diflubenzuron in baits for termites is distributed in all European countries that have this pest, without any problem of access to the product.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability</b>	I believe that having a perfectly valid alternative to use, it is

<b>and availability of the alternative</b>	essential to comply with legal requirements and exclude those materials that may be polluting the environment
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 40</b>	<b>2021/10/08 10:25</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in France
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Same as hexaflumuron
Information above is	

confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No issues for working with the alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential	

attachment	
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<b>Comment 41</b>	<b>2021/10/08 11:02</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in France
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	No issues for working with the alternatives
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	OK we buy from 3 different distributors

<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable.
Information above is confidential	
Justification for confidentiality	Hexaflumuron should be banned or restricted to non permanent baiting.
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 42</b>	<b>2021/10/08 13:26</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a termite treatment company. We operate on Reticulitermes flavipes and Reticulitermes grassei.
Product Type	18

<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Technics are known by the professional users.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Hexaflumuron users sell very short time service that don't always allow to eliminate termites and increases prices in case of new treatment.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Fipronil and Diflubenzuron products are biocide approved.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	This is fine for us.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	We don't agree with the current usage of hexaflumuron as a bait in all stations and we prefer biocide registered products.

Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 43</b>	<b>2021/10/08 15:38</b>
Country	Réunion
Name of organization/institution	APTA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We are an association of termites professionals (APTA) based on Reunion Island. We operate on different termites species including Coptotermes and Prorethinos. We use hexaflumuron under NON permanent baiting since 25 years and strongly believe that this method is the best for our island and activity.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Bistrifluron, Flufenoxuron, Chlorfluazuron, Permethrin, Cyperméthrin, chlorfluazuron or other chitin synthesis inhibitors.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Chitin synthesis inhibitors would be the same as what we do for the moment with hexaflumuron : non permanent baiting.



Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Other chitin synthesis inhibitors are not yet registered in Europe on our local species. There is a cost for registration.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Injections expose the ground to liquid biocides. We prefer baiting but not with the permanent use that Corteva wants to oblige us to do.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Chlorfluazuron is used in Australia and Mauritius on the same species, while Bistrifluron is used in Asia.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Apart from the registration costs, alternatives are suitable.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	In Reunion Island, the professionals have been using NON permanent baiting with hexaflumuron since 25 years. There is absolutely no need to put more bait in all the outside traps. With permanant baiting we are putting our soil in high risk of contamination but also our lagoons and rivers. Another consequence of permanant baiting is that we would control the houses less often. Less control will lead to high risk of attacks inside the houses that the owners would not be able to identify by themselves. 80% of the termites attacks in Reunion Island are located inside the houses. Reunion Island has a tropical climate which leads to a very important amount of termites. We proceed with a targeted

	and reasoned elimination, which would not be the case with permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 44</b>	<b>2021/10/08 16:07</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Termites service company operating since 1996 in the basque area
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Easy to use with common pest control technician tools. Good results
Information above is confidential	
Justification for confidentiality	

<b>Economic Feasibility</b>	Good
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	We use baits that are registered under biocide regulation
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Good. There are 2-3 different suppliers
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	There are suitable alternatives. Hexaflumuron should be banned from the continental area because it is not used as it should be
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The companies using hexaflumuron get the benefits of the very long delay for the registration of the final formulations. Since 2015 they use the product as a permanent baiting device, whereas it has been approved by ECHA on the basis of a non permanent bait
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidentiality	

attachment	
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<b>Comment 45</b>	<b>2021/10/08 18:50</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please mention that permanent baiting is prohibited. The current use of hexaflumuron is not in accordance with the Opinion approval of the AS. The approval mentions a non permanent baiting whereas the use recommended by the manufacturer is permanent baiting since 2015. This means 10 times more PBT insecticide per site treated.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron, Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	The alternative active substances have been used for a long period, more than 20 years, either for liquid injections in the walls to create a barrier, nor as termite non permanent baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	The alternative solutions are economically suitable.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Most of the alternative active substances have been evaluated and registered under the Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.

	Note that no termite bait has been registered for permanent baiting.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Diflubenzuron baits are available from several distributors in Europe and the formulations are registered under BPR. Fipronil and other liquids are also available.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Hexaflumuron should be authorized for tropical islands termites species only because there are several alternatives in Europe. AND permanent baiting must be clearly forbidden because there is no added value.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The delay for hexaflumuron registration is not normal. This helps the hexaflumuron users to keep on using it as a permanent bait. It is a PBT active that should be banned or at least very restricted.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014 . AMM n° FR2016-1029, AMM FR2019-0065, FR2017-0004
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 46</b>	<b>2021/10/09 17:02</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>ALTERNATIVE IDENTITY AND PROPERTIES En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metodología de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>TECHNICAL FEASIBILITY El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. Podemos mencionar, Artziniega y Moreda de Álava (Álava), Llanos de Bureba (Burgos), Unzue (Navarra), Villanueva de los Caballeros (Valladolid). Casco Histórico Al Muharraq (Bahrain). También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.</p>

	Casita del Príncipe del Escorial, Catedral de Tarazona, Palacio San Joao Novo (Oporto).
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	. - ECONOMIC FEASABILITY El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	HAZARD AND RISK OF THE ALTERNATIVE Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	AVAILABILITY El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termes. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	

Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	.- CONCLUSION ON SUITABILITY AND AVAILABILITY OF THE ALTERNATIVE Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el conste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 47</b>	<b>2021/10/09 17:02</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	



Product Type	18
<b>Alternative Identity and Properties</b>	ALTERNATIVE IDENTITY AND PROPERTIES En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metodología de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	TECHNICAL FEASIBILITY El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. Podemos mencionar, Artziniega y Moreda de Álava (Álava), Llanos de Bureba (Burgos), Unzué (Navarra), Villanueva de los Caballeros (Valladolid). Casco Histórico Al Muharraq (Bahrain). También ha resultado efectivo para la solución de problemas ocasionado por termitas en edificios catalogados de interés patrimonial. Casita del Príncipe del Escorial, Catedral de Tarazona, Palacio San Joao Novo (Oporto).
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	. - ECONOMIC FEASIBILITY El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta

	comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	HAZARD AND RISK OF THE ALTERNATIVE Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	AVAILABILITY El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	. - CONCLUSION ON SUITABILITY AND AVAILABILITY OF THE ALTERNATIVE Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a

	precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 48</b>	<b>2021/10/10 12:58</b>
Country	France
Name of organization/institution	Aquitaine Termites Contrôle
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We do termite treatments in France.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron.
Information above is confidential	
Justification for confidentiality	

<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No issues for working with the alternatives.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait are registered under biocide regulation.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 49</b>	<b>2021/10/10 19:21</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in France
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No issues for working with the alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait are registered under biocide regulation.
Information above is confidential	
Justification for confidentiality	

<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 50</b>	<b>2021/10/11 09:34</b>
Country	France
Name of organization/institution	stop insecte
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We do termite treatments in France

Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No issues for working with the alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non

	permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 51</b>	<b>2021/10/11 12:49</b>
Country	France
Name of organization/institution	LIPHATECH
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	La gestion des déchets est assuré dans le cadre de la maintenance et désinstallation du chantier ( tri et retraitement). Des formations continues sont assurées régulièrement et aussi pour les nous veaux applicateurs.
Product Type	18
<b>Alternative Identity and Properties</b>	Les 2 alternatives: la barrière chimique Termidor, ce procédé fait trop de dégâts sur leur maison et ne rentre pas dans l'optique environnemental. Le deuxième procédé piège à base de diflubenzuron, pas de traitement des déchets, pas d'efficacité sur les espèces invasives, en métropole élimination beaucoup trop longue et aussi avec une efficacité très moyenne. D'autre l'installation et le remplissage de la formulation ne sont pas sécurisés pour l'applicateur et s'il pleut beaucoup la formulation se délite et va directement dans le sol avant qu'un termite puisse le consommer



Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	

Attachments (non-confidential information)	NPi 119 - Art SentiTech HD.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 52</b>	<b>2021/10/11 15:46</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Hexaflumuron must not be registered for permanent baiting
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	These alternative active substances have been used for a long time in liquid injections or termite baiting. Easy to use
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Good
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered , including the hazard and risk.

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Ok we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 53</b>	<b>2021/10/11 16:42</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be	

published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	

Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	COMENTARIOS CONSULTA HEXAFLUMURON 20211011_signed.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 54</b>	<b>2021/10/11 17:00</b>
Country	France
Name of organization/institution	FIPEC (French Paints, Printing Inks, Artist Colours and Adhesives Association)
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	<p>The French Association of Industries for the Wood Preservation and Derived Materials (SPB: Syndicat national des industries de la préservation du bois et des matériaux dérivés), created in 1974, brings together manufacturers and distributors of wood preservatives and maintenance products as well as termite protection products. The activities of the SPB deal with techniques and products formulated to preserve raw or machined wood against degradation agents (wood decay fungi, molds, termites and wood boring insects) as well as finishing systems to beautify and maintain onsite timber. It includes biocidal products (TP 8 and/or TP 18) and non-biocidal products. Since 2011, the SPB has joined the FIPEC, a federation which now has 5 national associations active in the fields of paints, inks, colours, glues and adhesives and wood maintenance and preservation products. The missions of the SPB are the following:</p> <ul style="list-style-type: none"> <li>• Promote the use of treated wood in all</li> </ul>

	<p>relevant fields of application. • Study the technical, normative, and regulatory problems concerning the profession. • Coordinate relations with the various ministries: Environment, Industry, Housing, as well as the CEN (European Center for Standardization) and the FCBA (Technological Institute Forest Cellulose Wood-Construction Furniture). • Search with various professional organizations for all means of action to: - Organize, develop, promote, and defend the wood preservation professions, - Represent the profession with the public authorities and any independent body. • Actively contribute to respect for the environment and participate in the promotion of sustainable development policies. • Initiate and help research in favor of: - Improvement of methods of protecting wood and derived materials, - Respect for the user and reduction of the environmental impact. According to our knowledge, HEXAFLUMURON (CAS : 86479-06-3) is used in termites baits. This technology is the only one approved and recognized for the eradication of termites by baits in the French tropical areas. As the active substance is classified as persistent, bioaccumulative and toxic (PBT), we question the usefulness and environmental impact of the permanent baiting technique. Hexaflumuron is used in continental France as a permanent baiting biocide in all in ground stations since 2015, whereas it has been used as a non permanent baiting with proven efficacy for termite elimination during around 20 years before 2015.</p>
Product Type	18
<b>Alternative Identity and Properties</b>	Termite control is a professional business since the early eighties in France and Spain. There are several alternatives to hexaflumuron for the control of termite colonies in France mainland. Some alternatives are used for baiting and some other for injection. No alternative is available for baiting in tropical areas.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Alternatives to hexaflumuron products when possible have been on the market for around 20 years and the application techniques are known by the trained professionals. These products are either injected (liquids) or used as baits with non permanent baiting.
Information above is confidential	

Justification for confidentiality	
<b>Economic Feasibility</b>	The cost of the treatment of a building against termites depends on several factors such as the size of the infestation, the materials used in the building, the technique used to treat. Treatments with alternatives when possible are not more expensive than treatments with hexaflumuron.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Most of the alternative active substances have been evaluated under Biocide regulation. Several Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk. Alternatives containing diflubenzuron for instance show a lower hazards and risks level, as they are authorized for termite baiting but only for a non permanent baiting use, in order to minimize the exposure of the environment and technician. Diflubenzuron is not PBT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	When possible, most of the current European distributors of solutions against termites include alternatives to hexaflumuron in their portfolio. The availability for alternatives is widely covered in France, Spain, Portugal, Italy and Greece.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in continental Europe, not for tropical areas.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The question of permanent baiting is asked if hexaflumuron is renewed. Permanent baiting done with termite baits is not necessary for efficacy. It does not eliminate the termite

	colonies faster and exposes the building to higher risks than with non permanent baiting or liquid injections.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 55</b>	<b>2021/10/12 13:15</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Comparison with diflubenzuron (bait technique / post-construction)
Product Type	18
<b>Alternative Identity and Properties</b>	diflubenzuron/ LABYRINTH + (diflubenzuron 0.5%) or LABYRINTH (diflubenzuron 0.25%) ENSYTEX Europe
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	



Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>The diflubenzuron bait technology is less practical to set up than that with hexaflumuron; there are more risks to get in contact with the product. Overall the hexaflumuron bait products have no equivalent alternative regarding safety of use all along the colony elimination process including waste disposal service. This diflubenzuron bait technology is not so efficient as that with hexaflumuron. Hexaflumuron bait technology efficacy is very robust even in very difficult situations with high termite infestation levels. Therefore hexaflumuron bait solutions have no equivalent alternative regarding successful management of termite elimination. Many patrimonial locations have chosen hexaflumuron products for its efficacy on top of its safe/easy profile to set up. The diflubenzuron bait technology is not registered against tropical termites present in La Réunion island or Antilles islands or Guyana (Coptotermes sp, Heterotermes sp. ) but only against France mainland species (Reticulitermes sp.). Therefore the hexaflumuron products are the only bait technology products able to control subterranean termites from these territories.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	

Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 56</b>	<b>2021/10/13 00:53</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metódica de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo

	de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.

Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el conste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Realizamos muchos tratamientos de termitas con el diflubenzuron y con fipronil y no hay ninguna instalación donde no solucionemos el problema de termitas, por lo que no entiendo porque un producto PBT esta todavia activo dentro de la ECHA
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 57</b>	<b>2021/10/13 12:54</b>
Country	France
Name of	SC BERNON

organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparaison avec le Fipronil ( technique d'injection post construction)
Product Type	18
<b>Alternative Identity and Properties</b>	Marque commerciale TERMIDOR (9.6% Fipronil) de chez BASF
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The injection technique is not very reliable because, from experience, it is known that during injections, a not insignificant quantity of product flows on the ground.

	Indeed, the composition of the wall is heterogeneous, so that of the injected product too. First point: lack of effectiveness. In addition, it is a product which is reprotoxic, which has been abandoned in crops because it decimated bees (Gaucho nomenclature). Second point: low harmlessness. We have been working for more than twenty years with the hexaflumuron molecule in a non-leachable solid bait, which is not dispersed in the soil and therefore has no harm to the biotope. The low amounts of active ingredient add strength to this product since little consumption is required to eliminate colonies.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 58</b>	<b>2021/10/13 12:57</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in some Spain areas. We always use baiting treatments.
Product Type	18

<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use Exterra termite baiting system. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	The economic feasibility is ok.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	We have experience and are satisfied with the other products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are suitable and available for our needs.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting is not used anymore in pest control (i.e. rodent control) and we have good results. We are supposed

	to reduce the amount of biocides used.
Information above is confidential	
Justification for confidentiality	
References	Labyrinth registrations ES/MR(NA)-2020-18-00703
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 59</b>	<b>2021/10/13 13:17</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Pest control company based in France
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use another termite baiting system that is ok.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	We manage to be competitive
Information above is confidential	



Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait are registered under biocide regulation.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Yes
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Our products are more secured that hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 60</b>	<b>2021/10/13 13:58</b>
Country	Spain
I do not wish the name of my organisation/institution to be	1

published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metódica de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante nos garantiza el control con total éxito y garantía de problemas producidos por termitas. Hemos conseguido y certificado en los tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente es bastante inferior al coste realizado con el sistema con hexafloumuron</p>
Information above is	

confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares como públicos. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios inferiores, según la casuística de cada tratamiento.
Information above is confidential	
Justification for confidentiality	

<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 61</b>	<b>2021/10/13 14:21</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in some Spain areas. We always use baiting treatments.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We have been using diflubenzuron for many yeas with no technical issues and good elimination results
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with

	hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in Europe.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Since a few years hexaflumuron is used for permanent baiting in the ground. This is not useful and requires around 10 times more bait for the same result.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014
Attachments (non-confidential information)	
Attachments (confidential information)	

Justification for confidential attachment	
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<b>Comment 62</b>	<b>2021/10/13 14:31</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Pest control company based in Spain
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use Exterra termite baiting system. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No problems to work with other alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	We have experience and are satisfied with the other

	products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are more secured than hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting is not used anymore in pest control (i.e. rodent control) and we have good results. We are supposed to reduce the amount of biocides used.
Information above is confidential	
Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 63</b>	<b>2021/10/13 14:38</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in Spain
Product Type	18

<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron, Permethrin, Cyperméthrin
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	The alternative products can be used either for baiting (diflubenzuron) or liquid treatment.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Same as technical. We have experience and are satisfied with the other products.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	The diflubenzuron is used proportionally to the infestation and only during termite activity on the site. Both diflubenzuron and fipronil products that we use have biocide registrations.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Good. There are 2-3 different suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are suitable and available for our needs.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-



	permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	Labyrinth registrations ES/MR(NA)-2020-18-00703
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 64</b>	<b>2021/10/13 14:45</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	No creemos que sea aceptable el uso del hexaflumuron por ser un producto PBT
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metodología de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).</p>

Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como

	BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Es por ello que consideramos lógico que el Hexaflumuron en la evaluación sea sustituido
Information above is confidential	
Justification for confidentiality	
References	En mi labor, normalmente actúo sobre pueblos grandes y pequeños, además de instalaciones familiares. Nunca hemos tenido en mi empresa un problema de no terminar con las termitas, por lo que poner en el medio productos PBT no es lo adecuado ni medioambientalmente sostenible
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	
<b>Comment 65</b>	<b>2021/10/13 14:44</b>

Country	France
Name of organization/institution	VENDEE HOME PROTECT
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Les déchets termites et produits sont recyclés par SENTRI TECH. Sur la mise en œuvre du système SENTRI TECH nous bénéficions de formations et séminaires réguliers. Nos chantiers sont régulièrement contrôlés. A la fin des contrats, les chantiers sont désinstallés et les pièges recyclés.
Product Type	18
<b>Alternative Identity and Properties</b>	Termidor : 9.6% fipronil (BASF)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Chemical treatment with fipronil solution is a lot of constraint for manipulation, to protect the soil, drilling holes in the walls every 20 cm
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Cost is higher with fipronil because labour time is very high to implement and efficacy is lower than with hexaflumuron bait because it is random application, not targeted at the termite colony. Sometime, product solution is injected in the wall but we don't know where the product is going.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Structure for the house can be weakened by the holes with injection. Homeowner need to leave the house during the application, and applicator is more exposed with a liquid insecticide (risk of splashing) than with a solid bait with hexaflumuron. Application with hexaflumuron bait is not

	destructive for the house and not dangerous for the applicator and homeowner, and is easier to set up.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternative is available but is not suitable because implementation is more complex, it is increasing worker and owner exposure and efficacy is not a good on the long term because termites are not eliminated, they are just repelled, and as soon as they find a gap in the "chemical barrier", they come back. Hexaflumuron bait eliminates the colony and reinfestation is very rare, and only in the soil stations in the perimeter.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Les pièges à base de diflubenzuron sont moins efficaces, et nécessitent une plus grande quantité de produits. De plus, le produit se délite dans le sol, surtout par temps humide.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Justification for confidential attachment	

<b>Comment 66</b>	<b>2021/10/13 15:05</b>
Country	Spain

I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	WE ARE A PEST CONTROL COMPANY SPECIALIST IN TERMITE CONTROL THROUGH IGR BAITTS
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We have been using diflubenzuron for many yeas with no technical issues and good elimination results
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluaed under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in Europe.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 67</b>	<b>2021/10/13 15:28</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in Spain
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron, Permethrin, Cyperméthrin
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use a registered termite baiting system. Non permanent

	baiting is the best efficacy / low exposure way.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	The economic feasibility is ok.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait treatment is registered under the biocide regulation and is not classified as a PBT substance.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The delay for hexaflumuron registration is not normal. This allows the hexaflumuron to continue to be used as a permanent bait. It is a PBT asset that should be banned or at least severely restricted.
Information above is confidential	
Justification for confidentiality	
References	Labyrinth registrations ES/MR(NA)-2020-18-00703
Attachments (non-confidential information)	



Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 68</b>	<b>2021/10/13 15:33</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a termite treatment company in Spain. We do around 50 termite jobs per year. We don't agree with the permanent baiting with hexaflumuron.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Same as hexaflumuron
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No problems to work with other alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait treatment is registered under the biocide regulation and is not classified as a PBT substance.
Information above is confidential	

Justification for confidentiality	
<b>Availability</b>	Good. There are 2-3 different suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	It is easy for us to use other products and has less danger due to the low toxicity of the product.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 69</b>	<b>2021/10/13 15:39</b>
Country	Spain
Name of organization/institution	Control Paga Quality
I do not wish the name of my organisation/institution to be published on the ECHA	

website.	
General information	We do termite treatments in some Spain areas. We always use baiting treatments.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use Exterra termite baiting system. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in Europe.
Information above is	

confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting is not used anymore in pest control (i.e. rodent control) and we have good results. We are supposed to reduce the amount of biocides used.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 70</b>	<b>2021/10/13 15:46</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Evaluación del hexaflumurón
Product Type	18
<b>Alternative Identity and Properties</b>	En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metódica de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis

	de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	

<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termes. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el conste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	Complejo hospitalario de Navarra
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential	

attachment	
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<b>Comment 71</b>	<b>2021/10/13 16:00</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Termite service company operating in the area north of Spain.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron, Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We have been using diflubenzuron for many yeas with no technical issues and good elimination results
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	

<b>Availability</b>	We have experience and are satisfied with the other products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are more secured than hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	Labyrinth registrations ES/MR(NA)-2020-18-00703
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 72</b>	<b>2021/10/13 16:04</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in some Spain areas. We always use baiting treatments.



Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	The alternative products can be used either for baiting (diflubenzuron) or liquid treatment.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No problems to work with other alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	The diflubenzuron is used proportionally to the infestation and only during termite activity on the site. Both diflubenzuron and fipronil products that we use have biocide registrations.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	We have experience and are satisfied with the other products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	It is easy for us to use other products and has less danger due to the low toxicity of the product.
Information above is confidential	
Justification for confidentiality	

<b>Other comments</b>	The delay for hexaflumuron registration is not normal. This allows the hexaflumuron to continue to be used as a permanent bait. It is a PBT asset that should be banned or at least severely restricted.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 73</b>	<b>2021/10/13 16:08</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in some Spain areas. We always use baiting treatments.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We have been using diflubenzuron for many yeas with no technical issues and good elimination results
Information above is	

confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Treatments with alternatives are cheaper than with hexaflumuron bait.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are more secured than hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-	

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 74</b>	<b>2021/10/13 16:41</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	COMO EMPRESA APLICADORA DE TRATAMIENTOS FRENTE A TERMITAS, NO ES ACPTABLE EL USO DEL HEXAFLUMURON POR SER PBT, HABIENDO OTRAS ALTERNATIVAS EFICACES
Product Type	18
<b>Alternative Identity and Properties</b>	<p>A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamaso Sentri Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Nuestra experiencia permite avalar que con el sistema

	<p>Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el procolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>El sietema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>Todas las empresas que utilizan el diblubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumlación. Hay aplicaciones que no permiten el uso de productos PBT</p>
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	<p>Todas las empresas que utilizan el diblubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está</p>

	<p>catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumulación. Hay aplicaciones que no permiten el uso de productos PBT</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un sistema alternativo al Sistema Senti Tech y que garantiza el control de termites en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos de control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos, pueblos etc. e incluso núcleos urbanos. El TERMIGARD está en el portfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	<p>LOS TRATAMIENTOS CON DIFLUBENZURON, FIPRONIL, O TRATAMIENTOS DIRECTOS A LA MADERA PARA EL CONTROL DE TERMITAS SON SEGUROS EFECTIVO Y A UN COSTO INFERIOR AL USO DEL HEXAFLUMURON</p>
Information above is confidential	
Justification for confidentiality	
References	<p>SECTOR HORTOFRUCTIFERO EXPERTOS EN TRATAMIENTOS</p>

	DE TERMITAS RETICULITERMES FLAVIPES
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 75</b>	<b>2021/10/13 16:40</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	COMO EMPRESA APLICADORA DE TRATAMIENTOS FRENTE A TERMITAS, NO ES ACPTABLE EL USO DEL HEXAFLUMURON POR SER PBT, HABIENDO OTRAS ALTERNATIVAS EFICACES
Product Type	18
<b>Alternative Identity and Properties</b>	<p>A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamaso Sentri Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil</p>
Information above is confidential	

Justification for confidentiality	
<b>Technical Feasibility</b>	Nuestra experiencia permite avalar que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el procolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El sietema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Todas las empresas que utilizan el diblubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumlación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	



<b>Availability</b>	<p>Todas las empresas que utilizan el dibrubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El dibrubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumlación. Hay aplicaciones que no permiten el uso de productos PBT</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos El TERMIGARD está en el porfolio de los procustos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	<p>LOS TRATAMIENTOS CON DIFLUBENZURON, FIPRONIL, O TRATAMIENTOS DIRECGTOS A LA MADERA PARA EL CONTROL DE TERMITAS SON SEGUROS EFECTIVO Y A UN COSTO INFERIOR AL USO DEL HEXAFLUMURON</p>
Information above is confidential	

Justification for confidentiality	
References	SECTOR HORTOFRUCTIFERO EXPERTOS EN TRATAMIENTOS DE TERMITAS RETICULITERMES FLAVIPES
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 76</b>	<b>2021/10/13 16:49</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Les déchets termites et formulation sont gérés par Senti Tech Senti tech assure des formations régulières techniques, réglementaires. Nous avons un label excel vert concernant la qualité ce produit est utilisable dans l'agro alimentaire, les crèches etc...
Product Type	18
<b>Alternative Identity and Properties</b>	Le seul produit appât termite est à base de Diflubenzuron(labyrinth) c'est la seule alternative mais avec une efficacité faible et qui demande une préparation.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Oui, l'installation est plus longue, beaucoup moins sécurisé au niveau de l'appât. J'ai travaillé à st Barth, le diflubenzuron n'est pas P+ (ctba) sur les espèces tropicales.
Information above is confidential	
Justification for confidentiality	

<b>Economic Feasibility</b>	Le fait de ré intervenir plusieurs avec diflubenzuron rend le coût plus élevé à long terme.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Le labyrinth est une poudre volatile à préparer qui nécessite beaucoup de protection du technicien. Une fois dans la station si beaucoup d'humidité la formulation se délite par rapport à un produit comme le recrute qui est très sécurisé
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Aujourd'hui je ne verrai pas utilisé le labyrinth comme alternative.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Cela fait 20 ans que j'utilise l'héxaflumuron avec beaucoup de satisfactions.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential	

attachment	
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<b>Comment 77</b>	<b>2021/10/13 16:56</b>
Country	Portugal
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>No nível europeu existem 3 sistemas de controle de cupins por meio de iscas inibidoras da sintaxe da quitina: O sistema baseado em Hexaflumuron denominado Senti Tech, o sistema baseado em Diflubenzuron, denominado Termigard e o sistema baseado em Diflubenzuron, denominado Labirinto. Por Exterra O mecanismo de ação dos três é muito semelhante, além disso, a forma de ação é muito semelhante entre os três. Além da isca em si, as estações, formuladas etc. são quase idênticos, podendo trocar iscas ou dispositivos. Existem também no mercado produtos que são protetores de madeira contra o ataque de cupins, como protetores de madeira em gel e líquido, proteção de autoclave e proteção por barreiras de parede muito eficazes, principalmente quando há construções conjuntas onde uma parte é favorável à ação contra cupins e em outro prédio contíguo não está disposto a realizar a ação de forma que a barreira às paredes permita limitar a ação. Esses sistemas são baseados em fipronil</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>A nossa experiência permite-nos garantir que com o sistema Termigard, cujo material ativo é o Diflubenzuron, permite controlar todo o tipo de instalações seguindo as boas práticas de funcionamento concebidas pelo fabricante. Essas instalações variam de edifícios unifamiliares, vilas, bairros, centros históricos de cidades e vilas. Desta forma, seguindo o protocolo de ação vivido pela empresa há anos, são controlados todos os tipos de instalações.No caso do Patrimônio Nacional, inúmeras ações foram realizadas com</p>

	<p>sucesso garantido, seguindo o procedimento de projeto. É por isso que não existe situação em relação aos cupins que não possa ser controlada por meio de formulações de Diflubenzuron.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>O sete Termigard é aberto a todas as empresas que aprendem e são auxiliadas pelas empresas que possuem os sistemas baseados em diflubenzuron. O cliente tem tudo nas mãos para realizar um controle adequado dos cupins a preços da ordem de 20% a 30% mais baratos do que com o sistema Senti trech, que é fechado a poucas empresas e que possui exclusivamente este sistema.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>Todas as empresas que usam diflubenzuron, sabemos que o sistema de isca é um biocida que requer precauções de uso. O diflubenzuron é classificado como perigoso e tóxico, mas sabemos, e isso é muito importante em certas aplicações, que o hexaflumuron é classificado como perigoso, bioacumulativo e tóxico, o que significa que não pode agir devido a problemas de bioacumulação. Existem aplicativos que não permitem o uso de produtos PBT</p>
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	<p>TERMIGARD está no portfólio de produtos utilizados pelas empresas de Controle de Pragas. Temos acesso por telefone, correio, web et. É de uso exclusivo de pessoal especializado, ao qual se acede mediante a respectiva formação. A empresa proprietária do sistema disponibiliza todas as ferramentas para o desenvolvimento dos trabalhos com a Termigard. Cada empresa tem a sua relação com a empresa, sem contratos por meios ou exclusividades, o que permite a todas as empresas do sector ter acesso desde o início do seu projecto aos recursos necessários à realização das suas obras, com igual apoio técnico a todas as empresas e preços competitivos</p>

Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusões finais podem ser citadas: Devido à posição que representamos no setor, podemos afirmar que o diflubenzuron (Termigard System) é um sistema alternativo ao Senti Tech System e que garante o controle de cupins em todos os tipos de situações em horários semelhantes a custos mais baixos sem ser PBT. Isso é indicado pelos dados de controle para edifícios unifamiliares, áreas urbanas, edifícios de patrimônio nacional, centros históricos, cidades, etc. e até centros urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Não achamos correto usar um produto que seja PBT, com alternativas de igual ou melhor atividade contra cupins. No nosso caso, atuamos com produtos que, com igual competência de controle, apresentam menor risco para o meio ambiente e para as pessoas. Não entendemos que um produto PBT continue a ser mantido, existem alternativas verificáveis
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 78</b>	<b>2021/10/13 17:23</b>
Country	Spain
I do not wish the name of my	1

organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamaso Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>Nuestra experiencia permite avalar que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el procolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón</p>
Information above is confidential	

Justification for confidentiality	
<b>Economic Feasibility</b>	El sistema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termites a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Todas las empresas que utilizan el diflubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización. El diflubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumulación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El TERMIGARD está en el portfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un



	sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	No nos parece acertado que se utilice un producto que sea PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is confidential	
Justification for confidentiality	
References	Edificos publicos en la Isla de tenerife ( tratamiento frente a R.flavipes)
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 79</b>	<b>2021/10/13 17:35</b>
Country	Netherlands
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	

General information	In the Netherlands there are no biocidal products authorised containing this active substance. There are no PT 18 products authorised specifically to control termites in the Netherlands.
Product Type	18
<b>Alternative Identity and Properties</b>	
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	

<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 80</b>	<b>2021/10/13 18:10</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in Spain
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use a registered termite baiting system. Non permanent baiting is the best efficacy / low exposure way.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No problems to work with other alternatives
Information above is	

confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	We have experience and are satisfied with the other products suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are suitable and available for our needs.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 81</b>	<b>2021/10/13 18:17</b>
Country	France
Name of organization/institution	SOCIETE 3P
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison with fipronil TREATMENT AFTER BUILDING
Product Type	18
<b>Alternative Identity and Properties</b>	fipronil / TERMIDOR (fipronil 9,6%) BASF
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	<p>The chemical barrier treatment with fipronil, drives out termites from buildings without eliminating the colonies that reside in the earth. This repels termites in trees, plants or neighboring houses. The house is protected but the infestation continues elsewhere. The amounts of active ingredients are 20 times higher than when using hexaflumuron sticks. And Fipronil molecules soak up walls and can wash off with rain and / or humidity. A treatment by traps with Hexaflumuron, makes it possible to eradicate the colony (s) which connect to it, do not repel them in the neighbors, and also constitute a defensive system since the bait remains in the station, without being washed out. by the rain. The environmental impact is lower, the house better protected and the neighbors too</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 82</b>	<b>2021/10/13 19:29</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	

Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 sistemas con inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El efecto de ambos es muy parecido al del Hexaflumuron y el sistema de aplicación, con un protocolo de actuación casi indentico. Además también existen alternativas a los tratamientos de cebos con inhibidores de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección en madera y para la creación de barreras en los muros (Fipronil).</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>El acceso al Sistema Termigard en el mercado es sencillo sin ningún tipo de exclusividad ni contrato. Además posee un coste bastante inferior que los realizados por los otros sistemas.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero</p>

	con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termes. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No hay exclusividad ninguna y tampoco se exige ningún tipo de contrato para la utilización del mismo.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el conste de los tratamientos de control de termitas. Permite realizarlos a precios similares y en la mayoría de casos incluso inferiores, según las características de cada tratamiento.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	



Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 83</b>	<b>2021/10/13 22:49</b>
Country	Spain
Name of organization/institution	Grupo Rubio Servicios Higiénicos Integrales, S.L.
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumurón es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	

Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	83_Attachment_Preocupación entre los vecinos de Cortes ante la posibilidad de sufrir una plaga de termitas - Diario de Noticias de Navarra 83_Attachment_7.3. 1993_Nan-Yao&Schelfrahn 83_Attachment_Una plaga de termitas afecta ya a 19 viviendas de Los Fayos _ Noticias de Comarcas en Heraldos.es 83_Attachment_Defensa del Hexaflumuron 83_Attachment_Premiado el tratamiento contra termitas en Tudela _ Noticias de Tudela y Ribera en Diario de Navarra
Attachments (confidential)	

information)	
Justification for confidential attachment	

<b>Comment 84</b>	<b>2021/10/13 23:17</b>
Country	France
Name of organization/institution	termitechniques
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	The termitechniques company has been working since 2001 in anti-termite treatments in Guadeloupe, using in parallel the sentri tech (hexaflumuron) method of baiting station and treatments by drilling and injections until 2007. Then abandoning chemical injections because having very good results on all local species with baits that also use very little active ingredient and are placed in closed stations. in addition, there is no other baitable molecule that functions on all local species, nor is there a treatment method with such a reduced impact on the environment.
Product Type	18
<b>Alternative Identity and Properties</b>	
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	

Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 85</b>	<b>2021/10/14 00:29</b>
Country	Spain
I do not wish the name of my organisation/institution to be	1

published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamado Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>Nuestra experiencia permite avalar que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el protocolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón</p>
Information above is confidential	
Justification for confidentiality	

<b>Economic Feasibility</b>	El sistema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Todas las empresas que utilizan el diblubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumlación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El TERMIGARD está en el porfolio de los procustos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un

	sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	No nos parece acertado que se utilice un producto que sea PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is confidential	
Justification for confidentiality	
References	Casco Historico de Elorrio Barrios de Bilbao Casco histórico de Prajano
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 86</b>	<b>2021/10/14 00:46</b>
Country	Portugal
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18

<b>Alternative Identity and Properties</b>	<p>Existem 2 produtos inibidores da síntese de quitina no mercado, alternativos ao Hexaflumuron (sistema Senti Tech). O ingrediente ativo em ambos é o Diflubenzuron. E são eles o sistema Termigard da QUIMICA DE MUNGUÍÁ e o Labirinto do EXTERRA (ENSYSTEX). O mecanismo de ação de ambos é muito semelhante ao do Hexaflumuron e do sistema de aplicação, embora existam algumas diferenças no desenho das estações e na apresentação da formulação em forma de isca, o método de ação é praticamente idêntico. Além dos sistemas inibidores da síntese de quitina, em muitos casos, produtos de proteção convencionais que utilizam ingredientes ativos inseticidas podem ser usados para tratamentos de injeção de peças de madeira e para a criação de barreiras perimetrais nas paredes (Fipronil).</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>A utilização do material ativo Diflubenzuron através do Sistema Termigard, obedecendo em todos os momentos o Protocolo de Ação fornecido pela empresa fabricante, garante o controle com total sucesso e garantia dos problemas causados pelos cupins. E obtiveram e certificaram tratamentos realizados em diferentes níveis de complexidade, como residências, urbanizações, bairros e centros históricos de centros populacionais. Também tem sido eficaz na resolução de problemas causados por cupins em edifícios classificados como patrimoniais.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>O acesso ao Sistema Termigard no mercado é simples e não requer nenhum tipo de contrato específico ou está sujeito a exclusividade. O custo do tratamento realizado com este sistema é comparativamente 20% - 30% inferior ao custo realizado com o Sistema SENTRI-TE</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>As precauções de manuseio do Termigard (Diflubenzuron) são aquelas exigidas para esse produto químico. Eles são semelhantes aos do Hexaflumuron, mas com a exceção de</p>



	que no princípio alternativo proposto, um produto NÃO CLASSIFICADO como BPT é MANIPULADO. Já no caso do hexaflumuron, SE é CLASSIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	O Sistema TERMIGARD está disponível no Catálogo de Produtos Profissionais para PCOs. Juntamente com os vários componentes do Sistema, são fornecidos o Protocolo de Ação e o Suporte Técnico e Aconselhamento necessário para o desenvolvimento garantido do controle de cupins. É obrigatória a posse do Curso de Capacitação para o Manuseio de Produtos de Madeira Protetora e do respectivo cartão de credenciamento. Nenhum contrato específico é exigido para sua aquisição, nenhum outro tipo de acordo. Nenhum acordo de exclusividade para volume de compra ou escopo geográfico se aplica.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusões finais podem ser citadas: O diflubenzuron (Sistema Termigard) representa uma alternativa real à utilização do HEXAFLUMURON capaz de garantir o controle das pragas de cupins e, portanto, fornecer uma solução para a conservação de edifícios privados, públicos, patrimoniais e até centros urbanos de população. O uso do Diflubenzuron (Termigard System) não acarreta aumento no custo dos tratamentos de controle de cupins. Permite que sejam realizados a preços semelhantes ou até inferiores, dependendo da casuística de cada caso partic
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Não achamos correto usar um produto que seja PBT, com alternativas de igual ou melhor atividade contra cupins. No nosso caso, atuamos com produtos que, com igual competência de controle, apresentam menor risco para o meio ambiente e para as pessoas. Não entendemos que um produto PBT continue a ser mantido, existem alternativas verificáveis

Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 87</b>	<b>2021/10/14 01:24</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metodología de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).</p>
Information above is	

confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población. También ha resultado efectivo para la solución de problemas ocasionado por termites en edificios catalogados de interés patrimonial.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema Termigard en el mercado es sencillo y no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema resulta comparativamente un 20% - 30% inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de

	Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 88</b>	<b>2021/10/14 08:22</b>
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Country	Spain
Name of organization/institution	Anticimex
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumurón es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	

<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	defensa-hexaflumuron.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 89</b>	<b>2021/10/14 09:48</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in Spain
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron, Permethrin, Cyperméthrin

Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use a registered termite baiting system. Non permanent baiting is the best efficacy / low exposure way.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	The economic feasibility is ok.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Our bait treatment is registered under the biocide regulation and is not classified as a PBT substance.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are suitable and available for our needs.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The delay for hexaflumuron registration is not normal. This allows the hexaflumuron to continue to be used as a permanent bait. It is a PBT asset that should be banned or at least severely restricted.
Information above is confidential	

Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 90</b>	<b>2021/10/14 11:43</b>
Country	France
Name of organization/institution	ecoBAT
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison with fipronil (injection technique / post-construction)
Product Type	18
<b>Alternative Identity and Properties</b>	fipronil / TERMIDOR (fipronil 9,6%) BASF
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is	



confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Fipronil is a product that is banned in the agricultural sector because it has a strong impact on biodiversity by decimating bee colonies. The technology with fipronil is done by liquid injection in the walls. This leads to a leakage of the product during the intervention, which is likely to infiltrate and pollute the soil. The fipronil technology is therefore not so "gentle" compared to hexaflumuron products which are installed either as buried and protected stations outdoors or as box stations placed only where termite activity is visible (Protected box containing the bait simply attached with a few screws to the wall or wood). Therefore, the amount of hexaflumuron product units placed in the house are less important compared to fipronil injection points, hexaflumuron targets more the termite colony and does not impact the structure of the house. Finally, the Fipronil-based treatment does not eliminate termite colonies and only repulse away them, while the hexaflumuron-based treatment aims to eradicate the termite colony.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	

References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 91</b>	<b>2021/10/14 13:36</b>
Country	Spain
Name of organization/institution	QUIMICA DE MUNGUIA S.A.
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>Currently in the market, there are different alternatives to Hexaflumuron for termite control and protection of wooden structures from termite attack. .- Products for the treatment of wood, both preventive and curative once the wood is attacked by termites, innumerable formulations, both solvent and aqueous phase, ready to use or concentrates, liquids or gels, with efficacy and ten-year guarantee, are currently registered according to 528/2012 in the EU based on Cypermethrin 65 products Permethrin 132 products Fenoxicarb 1 product .- Physical-chemical anti-termite barrier, ready for use used during the construction phase of a building. There are different companies that manufacture and distribute products that form a physical-chemical barrier that prevents the attack of termites on new constructions, they are polyethylene films impregnated with permethrin or deltamethrin and are registered in accordance with Regulation 528/2012. .- Preventive/curative product for injection into walls. There is a product registered according to regulation 528/2012 based on fipronil (Thermidor SC), with a proven effectiveness for years in the fight against</p>

	<p>termites .- Anti-termite baits. There are two companies that manufacture anti-antitermite baits with diflubenzuron that act in the same way (inhibitor of chitin synthesis), the products are registered under Regulation 528/2012 in the countries of the Mediterranean arc with termite attack problems. (Portugal, Spain, France, Italy and Greece). The comparison with hexaflumuron (also termite bait inhibitor of chitin synthesis) would be:</p> <table border="0" data-bbox="613 472 1445 703"> <tr> <td></td> <td></td> <td>Hexaflumuron</td> <td></td> </tr> <tr> <td>Diflubenzuron</td> <td>Diflubenzuron/hexaflumuron ratio</td> <td></td> <td></td> </tr> <tr> <td>Concentration</td> <td>0,50%</td> <td>0,25%</td> <td>Persistence</td> </tr> <tr> <td>DT50 12°C (days)</td> <td>280</td> <td>7,5</td> <td>37</td> </tr> <tr> <td>times lower BCF Bioaccumulation</td> <td>5600</td> <td>320</td> <td></td> </tr> <tr> <td>17 times lower Toxicity Daphnia NOEC</td> <td></td> <td>0.0029 µg/l</td> <td></td> </tr> <tr> <td>0.04 µg/l</td> <td>14 times lower</td> <td>* Data from the</td> <td></td> </tr> </table> <p>Assessments orf Inclusion From all the above, it is shown that there are different effective alternatives to without hexaflumuron, both molecules and treatment strategies to face the problem of termite attack. so its continuity (hexaflumuron) in the market is not justified, which would mean avoiding contamination with a PBT product of 3000 sites/year x 2360 m2/work x 1 m depth x 1.33 Tn/m3 = 9.42 x 106 Tn ground/year. * Data from the Assessment of Inclusion of Hexaflumuron</p>			Hexaflumuron		Diflubenzuron	Diflubenzuron/hexaflumuron ratio			Concentration	0,50%	0,25%	Persistence	DT50 12°C (days)	280	7,5	37	times lower BCF Bioaccumulation	5600	320		17 times lower Toxicity Daphnia NOEC		0.0029 µg/l		0.04 µg/l	14 times lower	* Data from the	
		Hexaflumuron																											
Diflubenzuron	Diflubenzuron/hexaflumuron ratio																												
Concentration	0,50%	0,25%	Persistence																										
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17 times lower Toxicity Daphnia NOEC		0.0029 µg/l																											
0.04 µg/l	14 times lower	* Data from the																											
Information above is confidential																													
Justification for confidentiality																													
<b>Technical Feasibility</b>	<p>Technically in the market there is a wide variety of available products, with different molecules and with four different strategies, for the fight and control of termites in the EU, these products have been used in the EU by the PCO for decades, so there is knowledge and widespread practice for their use, alternating the different strategies and even combining them according to the particular needs of the work in question. The use of Hexaflumuron does not bring any novelty in terms of strategy or effectiveness that has not existed for decades available to the market and used by PCOs.</p>																												
Information above is confidential																													
Justification for confidentiality																													
<b>Economic Feasibility</b>	<p>The cheapest strategies for the fight against termite attack on wood are the preventive-curative treatment of wooden structures through products registered for that use as group 08, or preventively through the placement of physical-</p>																												

	<p>chemical barriers in pre-construction. Comparing with the same strategy of using cellulosic baits against termites, if we compare the cost of treatment of a house with hexaflumuron or diflubenzuron through the registered product TERMIGARD, according to the information transmitted to us by the different PCO, customers and non-customers is that with TERMIGARD, a similar and effective treatment can mean a saving of 20 – 25%. From an economic point of view, the maintenance of hexaflumuron on the market does not provide any advantage over the strategies and products currently available on the market, so the continuity of hexaflumuron is not justified from an economic point of view.</p>																				
Information above is confidential																					
Justification for confidentiality																					
<b>Hazards and Risks of the Alternative</b>	<p>All products that exist for the anti-semite treatment according to the different strategies described are registered in different EU countries, in accordance with Regulation 528/2012 with insecticidal molecules included in Annex I without PBT classification. In the case of anti-termite baits it is easier to make the comparison with baits with diflubenzuron Hexaflumuron Diflubenzuron</p> <table border="1"> <thead> <tr> <th>Diflubenzuron/hexaflumuron ratio</th> <th>Concentration</th> <th>Persistence DT50 12°C (days)</th> <th>BCF</th> </tr> </thead> <tbody> <tr> <td>0,50%</td> <td>0,25%</td> <td>280</td> <td>5600</td> </tr> <tr> <td></td> <td></td> <td>7,5</td> <td>320</td> </tr> <tr> <td></td> <td></td> <td></td> <td>37 times lower</td> </tr> <tr> <td></td> <td></td> <td></td> <td>17 times lower</td> </tr> </tbody> </table> <p>Toxicity Daphnia NOEC 0.0029 µg/l 0.04 µg/l 14 times lower * Data from the Assessments orf Inclusion From all the above, it is shown that there are different effective alternatives to without hexaflumuron, both molecules and treatment strategies to face the problem of termite attack. so its continuity (hexaflumuron) in the market is not justified, which would mean avoiding contamination with a PBT product of 3000 sites/year x 2360 m<sup>2</sup>/work x 1 m depth x 1.33 Tn/m<sup>3</sup> = 9.42 x 10<sup>6</sup> Tn ground/year. * Data from the Assessment of Inclusion of Hexaflumuron There would be no justification for maintaining hexaflumuron, as there are effective alternatives that pose much less risk.</p>	Diflubenzuron/hexaflumuron ratio	Concentration	Persistence DT50 12°C (days)	BCF	0,50%	0,25%	280	5600			7,5	320				37 times lower				17 times lower
Diflubenzuron/hexaflumuron ratio	Concentration	Persistence DT50 12°C (days)	BCF																		
0,50%	0,25%	280	5600																		
		7,5	320																		
			37 times lower																		
			17 times lower																		
Information above is confidential																					
Justification for confidentiality																					
<b>Availability</b>	The market has a wide variety of strategies in the fight																				

	against termites with multiple registered products available with several companies that manufacture and market these products in different EU countries. The disappearance of hexaflumuron would not cause any alteration in the market in terms of availability of products by PCO for the fight and control of termites.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Considering the information provided in the previous field, there are several alternatives currently on the market (registered and marketed) both from a technical point of view, availability, economic cost, Hazard and risks, which substantially improve products with hexaflumuron, so there is no justification for continuing with a product that meets the exclusion criteria clearly specified in the text of the BPR.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	BPR Regulation 528/2012 Hexaflumuron Assessment of inclusion Diflubenzuron Assessment of inclusion ECHA Europe page for molecules assessments and registrations in European countries
Attachments (non-confidential information)	HEXAFLUMURON CONSULTATION.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 92</b>	<b>2021/10/14 13:48</b>
Country	Portugal

I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Pest control company based in Portugal
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use a registered termite baiting system. Non permanent baiting is the best efficacy / low exposure way.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	No problems to work with other alternatives
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the</b>	The diflubenzuron termite baits are suitable and available for our needs.

<b>alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 93</b>	<b>2021/10/14 13:54</b>
Country	Portugal
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in some Portugal areas. We always use baiting treatments.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron
Information above is confidential	
Justification for confidentiality	

<b>Technical Feasibility</b>	We have been using diflubenzuron for many years with no technical issues and good elimination results
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Same as technical. We have experience and are satisfied with the other products.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Good. There are 2-3 different suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	The diflubenzuron termite baits are more secured than hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	The delay for hexaflumuron registration is not normal. This allows the hexaflumuron to continue to be used as a permanent bait. It is a PBT asset that should be banned or at least severely restricted.
Information above is confidential	
Justification for confidentiality	



References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 94</b>	<b>2021/10/14 13:59</b>
Country	Portugal
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a termite treatment company. We were using hexaflumuron before and moved to other products, permanent baiting is not necessary.
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Diflubenzuron, Permethrin, Cyperméthrin
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We use Exterra termite baiting system. Easy to use.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	The economic feasibility is ok.
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	The diflubenzuron is used proportionally to the infestation and only during termite activity on the site. Both diflubenzuron and fipronil products that we use have biocide registrations.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Available through several distributors in Europe
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in Europe.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Permanent baiting is not used anymore in pest control (i.e. rodent control) and we have good results. We are supposed to reduce the amount of biocides used.
Information above is confidential	
Justification for confidentiality	
References	Current biocide registrations. Opinion on the application for approval of the active substance : Hexaflumuron – Product Type 18 – ECHA/31/2014
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 95</b>	<b>2021/10/14 15:18</b>
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Country	Spain
Name of organization/institution	ECOPLAGAS DEL MEDITERRÁNEO, SL
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	We are a Spanish Pest Control Company. We are in the east of Spain, doing treatments against termites since 2013.
Product Type	18
<b>Alternative Identity and Properties</b>	Diflubenzuron, Fipronil, Permethrin, Cyperméthrin, chlorfluazuron or other chitin shynthesis inhibitors
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	We have been using diflubenzuron, from Exterra, for many years with no technical issues and good elimination results
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Same as technical. We have experience and are satisfied with the other products (Exterra baits)
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Diflubenzuron is an active ingredient, currently, according to the biocide law and according to the ECHA environmental criteria to be discarded as a PBT substance (persistent, bioaccumulative and toxic).
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Actually, I know 2 different suppliers for diflubenzuron. If we add Fipronil, Permethrin, Cyperméthrin, chlorfluazuron

	or other chitin shynthesis inhibitors, there are enough suppliers.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Alternatives are suitable and viable for termite control companies in Europe. The diflubenzuron termite baits are more secured that hexaflumuron termite baits because we use much less bait and control more often.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non-permanent baits because it is a more dangerous alternative to other bait substances.
Information above is confidential	
Justification for confidentiality	
References	The Biocides Regulation (BPR, Regulation (EU) 528/2012) which is necessary for all substances.
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 96</b>	<b>2021/10/14 16:35</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	

Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	

Justification for confidentiality	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Senti Tech (Hexaflumuron), lo que facilita su uso.
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-	

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 97</b>	<b>2021/10/14 16:44</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.

Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Sentri Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos,



	patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 98</b>	<b>2021/10/14 16:49</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a

	Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema SENTRY TECH (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el

	<p>Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termes. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el conste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 99</b>	<b>2021/10/14 16:55</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's

	cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Sentri Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is	

confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 100</b>	<b>2021/10/14 17:02</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentry Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.</p>

Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Senti Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su

	adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 101</b>	<b>2021/10/14 17:08</b>
Country	Spain
I do not wish the name of my	1



organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Senti Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	

Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 102</b>	<b>2021/10/14 17:08</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés

	patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Senti Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de

	garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 103</b>	<b>2021/10/14 17:13</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	El mercado dispone de tres sistemas de cebos termiticidas basados en inhibidores de la síntesis de quitina, uno en base a Hexaflumuron (Sentri Tech) y dos en base a Diflubenzurón, (TERMIGARD SYSTEM de QUIMICA DE

	MUNGUÍA) y Labyrinth (EXTERRA de ENSYSTEX), los tres de similar funcionamiento y aplicación. Además de estos tres sistemas de cebos termiticidas el mercado dispone de un producto específico de BASF (Termidor) para tratamientos perimetrales en muros en base a Fipronil y una variedad de protectores de madera que emplean distintos principios biocidas específicos para la termita.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	De acuerdo con el protocolo de actuación facilitado por la empresa fabricante del Sistema TERMIGARD, los tratamientos pueden garantizar sus resultados con total éxito como demuestran los trabajos realizados en viviendas particulares, urbanizaciones, barrios, cascos históricos de núcleos de población y edificios catalogados de interés patrimonial, logrando el control de las termitas en los trabajos realizados.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema TERMIGARD no requiere de ningún tipo de contrato específico sometido a exclusividad, aportando una ventaja importante para las empresas PCO's cualificadas para estos tratamientos con respecto a otros sistemas. Además, su coste final, es inferior en un 20 / 30% al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Al no estar clasificado como BPT, el Sistema TERMIGARD (Diflubenzuron) no requiere una manipulación especial como ocurre con el sistema Senti Tech (Hexaflumuron), lo que facilita su uso.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO's. Junto con

	<p>los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.</p>
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Como conclusiones finales se pueden mencionar: El Diflubenzuron (Sistema TERMIGARD) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema TERMIGARD) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en particular.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 104</b>	<b>2021/10/14 18:00</b>
Country	France
Name of organization/institution	DETEC-BOIS
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison with fipronil (injection technique / post-construction)
Product Type	18
<b>Alternative Identity and Properties</b>	fipronil / TERMIDOR (fipronil 9,6%) BASF
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	



Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Fipronil wall injection technology is a method that does not eliminate the termite colony. It only makes it possible to create a barrier. So this is not a radical solution. In addition, the injection technique of Fipronil is inconvenient for customers. Indeed, it is a matter of making holes all over the walls of the house: injecting the product causes drips that are complicated to manage, especially inside houses. Finally, the odors of Fipronil often require customers to leave their homes during the work.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 105</b>	<b>2021/10/14 18:13</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and</b>	En el territorio de la Union existen 3 sistemas de control de

<b>Properties</b>	<p>termitas por medio de cebos inhibidores de la síntesis de quitina: El sistema a base de Hexaflumuron llamado Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra. El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termites y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permita acotar la actuación, Estos sistemas están basados en fipronil</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>Avalamos que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el protocolo de diseñado. Es por ello que no existe situación en cuanto a termites se refiere que no sea posible controlar por medio de formulados de Diflubenzurón</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>Un dato importante es que el sistema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termites a unos precios del orden del 20% al 30% más económico que con el sistema Senti Tech que es cerrado para unas cuantas</p>

	empresas y que tiene ese sistema en exclusividad
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	En el caso de nuestra empresa como en todas las empresas que utilizan el diblubenfurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización. El diblubenfurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumulación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	El TERMIGARD está en el portfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Por todo lo dicho anteriormente no nos parece acertado que se utilice un producto que sea PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso

	actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is confidential	
Justification for confidentiality	
References	Nuestro ámbito de trabajo son control de termitas en pueblos, organismos públicos y edificios privados
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 106</b>	<b>2021/10/14 18:27</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamaso Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay

	edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Avalamos que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el protocolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El sistema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer

	la actuación por problemas de bioacumulación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El TERMIGARD está en el porfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	En nuestra opinion no se puede utilizar un prodcuto PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is	

confidential	
Justification for confidentiality	
References	Instalaciones publico y privadas
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 107</b>	<b>2021/10/14 18:27</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>A nivel Europeo existen 3 sistemas de control de termitas por medio de cebos inhibidores de la sintexis de quitina: El sistema a base de Hexaflumuron llamaso Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos. También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termes y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basado en fipronil</p>
Information above is	

confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Avalamos que con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el protocolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurón
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El sistema Termigard está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diflubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumulación. Hay aplicaciones que no permiten el uso de productos PBT
Information above is confidential	
Justification for confidentiality	



<b>Availability</b>	El TERMIGARD está en el porfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	En nuestra opinion no se puede utilizar un prodcuto PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is confidential	
Justification for confidentiality	
References	Instalaciones publico y privadas
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 108</b>	<b>2021/10/14 18:32</b>
Country	Réunion
Name of organization/institution	Observatoire Régional de Lutte Anti-Termite
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	

Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	Opinion on the use of Hexaflumuron in the context of eliminating termites.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 109</b>	<b>2021/10/14 20:28</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and</b>	En el mercado existen otros sistemas con inhibidores de la

<b>Properties</b>	síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El efecto de ambos es muy parecido al del Hexaflumuron y el sistema de aplicación, con un protocolo de actuación casi indentico. Además también existen alternativas a los tratamientos de cebos con inhibidores de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros (Fipronil).
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, garantiza el control con total éxito y garantía de problemas producidos por termitas. Y se han conseguido y certificado, tratamientos realizados a diferentes niveles de complejidad, tales como viviendas particulares, urbanizaciones, barrios y cascos históricos de núcleos de población.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El acceso al Sistema Termigard es muy sencillo y sin ninguna exigencia de exclusividad por parte del fabricante, teniendo unos costes inferiores al los otros fabricantes.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere un producto químico de esta índole. Son similares a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	

Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No hay exclusividad ninguna y tampoco se exige ningún tipo de contrato para la utilización del mismo.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares y en la mayoría de casos incluso inferiores, según las características de cada tratamiento.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential	

attachment	
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<b>Comment 110</b>	<b>2021/10/14 20:34</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>En el mercado existen 2 productos inhibidores de la síntesis de quitina, alternativos al Hexaflumuron (sistema Senti Tech). El principio activo de ambos es el Diflubenzuron. Y son el sistema Termigard de QUIMICA DE MUNGUÍA y Labyrinth de EXTERRA (ENSYSTEX). El mecanismo de acción de ambos es muy similar al del Hexaflumuron y el sistema de aplicación, si bien tiene alguna diferencia en el diseño de las estaciones y en la presentación del formulado en forma de cebo, la metodología de actuación es prácticamente idéntica. Al margen de los sistemas inhibidores de la síntesis de quitina, en muchos casos se pueden emplear los productos protectores convencionales que emplean principios activos insecticidas, para tratamientos por inyección de las piezas de madera y para la creación de barreras perimetrales en los muros.</p>
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	<p>El empleo de la materia activa Diflubenzuron mediante el Sistema Termigard, siguiendo en todo momento el Protocolo de Actuación facilitado por la empresa fabricante, garantiza el control con total éxito y garantía de problemas producidos por termitas. Todos los tratamientos realizados se han complementado con éxito.</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>El acceso al Sistema Termigard en el mercado es sencillo y</p>

	no requiere de ningún tipo de contrato específico ni está sometido a exclusividad. El coste del tratamiento realizado con este sistema es bastante inferior al coste realizado con el Sistema SENTRI-TECH.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las precauciones de manipulación de Termigard (Diflubenzuron) son las que requiere el producto. muy parecidas a las del Hexaflumuron, pero con la salvedad de que en el principio alternativo que se propone SE MANIPULA producto NO CLASIFICADO como BPT. Mientras que en caso de Hexaflumuron, SI está CLASIFICADO como BPT.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	El Sistema TERMIGARD se encuentra disponible en el Catálogo de Productos Profesionales para PCO´s. Junto con los diversos componentes del Sistema se aporta el Protocolo de Actuación y el Soporte y Asesoramiento Técnico necesario para el desarrollo garantizado del control de termites. Se requiere de la posesión del Curso de Capacitación para la manipulación de Productos protectores de madera y el correspondiente carnet acreditativo del mismo. No se requiere ningún contrato específico para su adquisición, ningún otro tipo de convenio. Tampoco se aplica ningún acuerdo de exclusividad por volumen de compra, ni de ámbito geográfico.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: El diflubenzuron (Sistema Termigard) representa una alternativa real al uso del HEXAFLUMURON capaz de garantizar el control de plagas de termitas y por tanto dar solución la conservación de edificios particulares, públicos, patrimoniales e incluso núcleos urbanos de población. El empleo de Diflubenzuron (Sistema Termigard) no supone ningún incremento en el coste de los tratamientos de control de termitas. Permite realizarlos a precios similares e incluso inferiores, según la casuística de cada caso en

	particular.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 111</b>	<b>2021/10/15 09:50</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumurón es esencial)
Information above is	



confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-	COMENTARIOS PARA CONSULTA_irr_2.pdf

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 112</b>	<b>2021/10/15 10:32</b>
Country	France
Name of organization/institution	Liphatech
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Comparison with fipronil (injection technique / post-construction).
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil / TERMIDOR (fipronil 9,6%) BASF
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	<p>Fipronil technology is achieved by injecting the product as a liquid solution into the wall. This technology is not soft compared to hexaflumuron products which are a limited number of aerial stations installed as specific underground stations or only in places where termite activity is visible. Therefore, compared to the fipronil injection points, the number of units of hexaflumuron products placed in the frame is much more limited and the confirmed termite activity is more targeted, so it will not affect the structure of the frame.</p>
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 113</b>	<b>2021/10/15 12:19</b>
Country	France

I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We are a laboratory that has been testing all termite habitat protection systems for 27 years. In particular curative treatments such as hexaflumuron formulations. For this we carry out laboratory tests but also a lot of tests directly on construction sites. We are working to authorize these treatments in Western Europe (France, Spain) (Reticulitermes spp.) but also in French overseas areas (Coptotermes spp., Heterotermes spp., Nasutitermes spp.) where the termite problem is endemic with a strong social and economic impact.
Product Type	18
<b>Alternative Identity and Properties</b>	To eliminate termites from a house, there are 2 alternatives: By a bait system: alongside the formulations based on Hexaflumuron Senti-Tech, there are effective formulations based on diflubenzuron from Ensystem and Quimunsa. By a treatment using a liquid insecticide with fipronil which is injected into the walls and with permethrin or cypermethrin which is injected into the wood. In Europe these 2 solutions are possible. In overseas areas, diflubenzuron-based formulations are not effective against local termites and only wall and wood treatments with liquid biocides are effective. In overseas areas there is therefore no alternative to hexaflumuron if we want to eliminate termites with a bait system.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	All the techniques mentioned already exist.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	All the techniques mentioned are already on the market.
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	<p>In France, the arrival of curative control systems against termites has drastically reduced the use and presence of conventional (neurotoxic) insecticides in homes. 80% of curative works against termites are carried out with baits. Limiting the use of bait would amount to going back on this progress in reducing biocides with an impact on human health in the habitat. Reminder: bait formulations do not come into contact with users of treated buildings and are removed from the site when the termite elimination objective is reached. In overseas areas, the only alternative is treatment with liquid insecticides. These areas are often islands with populations sensitized to the use of liquid insecticides which cause claims in the areas of health and the environment. In Europe and overseas tropical areas, Senti-Tech formulations with hexaflumuron have never posed a health or environmental problem. Including for aquatic environments: American crayfish, sensitive to moult inhibitors, spread without problems in areas where baits are used a lot.</p>
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-	

confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 114</b>	<b>2021/10/15 12:31</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumurón es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	

<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	15) Consulta Hexaflumurón. Desinfecciones Abando.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 115</b>	<b>2021/10/15 12:44</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my	

organisation/institution to be published on the ECHA website.																					
General information																					
Product Type	18																				
<b>Alternative Identity and Properties</b>	<p>Considering its control strategy, Hexaflumuron is an anti-termite bait. Hexaflumuron meets the criteria for being a persistent, bioaccumulative and toxic substance (PBT substance), and a very persistent and very bioaccumulative substance (vPvB substance) according to Annex XIII to Regulation (EC) 1907/2006 of the European Parliament and of the Council, meeting the exclusion criteria set out in Article 5(1), point (e), of Regulation (EU) 528/2012. As far as we know, there are two companies currently marketing other anti-termite baits (using Diflubenzuron), authorized under Regulation 528/2012 through the same strategy; inhibitor of chitin synthesis -none is classified as PBT-. The other existing strategies in the market are: - Preventive/curative product for injection into walls. - Physical-chemical anti-termite barrier, ready for use used during the construction phase of a building. - Preventive/curative treatments of wood, Considering the figures available at the inclusion assessments, we can offer the next comparison:</p> <table border="0"> <tr> <td></td> <td>Hexaflumuron</td> <td>Diflubenzuron</td> <td></td> </tr> <tr> <td>Diflubenzuron/hexaflumuron ratio</td> <td>0,50%</td> <td>0,25%</td> <td></td> </tr> <tr> <td>Persistence DT50 12°C (days)</td> <td>280</td> <td>7,5</td> <td>37 times lower</td> </tr> <tr> <td>BCF Bioaccumulation</td> <td>5600</td> <td>320</td> <td>17 times lower</td> </tr> <tr> <td>Toxicity Daphnia NOEC</td> <td>0.0029 µg/l</td> <td>0.04 µg/l</td> <td>14 times lower</td> </tr> </table> <p>The extraordinary difference between the PBT figures speaks for themselves.</p>		Hexaflumuron	Diflubenzuron		Diflubenzuron/hexaflumuron ratio	0,50%	0,25%		Persistence DT50 12°C (days)	280	7,5	37 times lower	BCF Bioaccumulation	5600	320	17 times lower	Toxicity Daphnia NOEC	0.0029 µg/l	0.04 µg/l	14 times lower
	Hexaflumuron	Diflubenzuron																			
Diflubenzuron/hexaflumuron ratio	0,50%	0,25%																			
Persistence DT50 12°C (days)	280	7,5	37 times lower																		
BCF Bioaccumulation	5600	320	17 times lower																		
Toxicity Daphnia NOEC	0.0029 µg/l	0.04 µg/l	14 times lower																		
Information above is confidential																					
Justification for confidentiality																					
<b>Technical Feasibility</b>	<p>Depending on the concrete problem he faces, the European consumers holds a solid group of alternative products, with diverse compositions and adapted to four different control strategies, for the fight and control of termites in the EU. Actually, there is a consolidated historic of safe an efficient use, well adapted to the circumstances of every case. In the other hand Hexaflumuron does not provide any added value, to the control strategies, while its risk profile remains much worst.</p>																				



Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>Taking into account, as a close example Termigard (marketed in Spain by QUIMUNSA), a product using the same control strategy than Hexaflumuron (cellulosic baits), and according to the available public information, the first one would remain from 20 to 25% cheaper. Preventive-curative treatment of wooden structures using products registered for that use as group 08, or by placement of physical-chemical barriers in pre-construction, are traditionally less expensive. Therefore, there is no advantage for the customer from an economical point of view, in keeping Hexaflumuron authorized within the EU market. We consider this point relevant as usually, environment careful products are traditionally more expensive. But this is not the case for Hexaflumuron which is more harming and more onerous.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>At this stage arises a negative benefit/risk balance, if we compare Hexaflumuron with the rest of the marketed products. Such a balance is concept coming from the pharmaceutical sector, easily transposable to our area. It is a major criteria to the comparative assessment according to article 23.3.a) of Regulation 528/2012: a). for the uses specified in the application, another authorised biocidal product or a non-chemical control or prevention method already exists which presents a significantly lower overall risk for human health, animal health and the environment, is sufficiently effective and presents no other significant economic or practical disadvantages; By this, we must point how a product which could have been acceptable at the date of its first approval, becomes unsuitable because of the introduction of new anti-termite treatment products minimizing the tension between the efficacy and the risks for environment and health. Therefore, the state of science evolution combined with the existing competitive products, with a much positive safety profile, advises the immediate withdrawal of Hexaflumuron from the EU market. As far as we know, except Hexaflumuron, there is no available product in the EU market classified as PBT, under Regulation 528/2012. Hexaflumuron was authorized considering its efficacy against Coptotermes species, only</p>

	present in French DOM-TOM. Therefore, it would be an alternative option, under article 23.3 of Regulation 428/2012, by restricting its use to those overseas territories, banning them within the European soil.
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	As we previously showed, there is a wide range of products in the market, offering to the consumers a wide variety of insecticidal strategies. The Hexaflumuron withdrawal from the EU market would not create any commercial demand gap.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	According to the information explained in previous points, not only there is a wide variety of alternative products in the market, but its suitability comes from its improved risk assessment by mere comparison with a product classified as BPT (Hexaflumuron).
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	At last, we invoke the application of the EU "precautionary principle" which enables a quick response to face possible danger to human, animal or plant health -Communication from the Commission on the precautionary principle/ -COM/2000/0001 final-. This principle is currently used to protect the environment. The presence of a PBT product openly breaches the letter and the spirit of article 191 of the Treaty on the Functioning of the European Union, stating an environmental "high level of protection" under its current draft: 2. Union policy on the environment shall aim at a high level of protection taking into account the diversity of situations in the various regions of the Union. It shall be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source and that the polluter should pay. In this context, it would seem contradictory to request "measures answering environmental protection requirements" to the national

	<p>authorities while EU institutions keep a low environmental profile. We allege the European Commission chemicals strategy for sustainability on 14 October 2020 grounds, as part of the EU's zero pollution ambition, which is a key commitment of the European Green Deal: It has also set a goal to protect better human health and the environment as part of an ambitious approach to tackle pollution from all sources and move towards a toxic-free environment. Finally, related to the precautionary approach, we must point, as well, Principle 15 of the 1992 Rio Declaration; "where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation". Again, we must insist about the Hexaflumuron "persistence" factor. Given this background, it has been disconcerting to learn that Hexaflumuron authorization validity was recently postponed to 30 September 2024 under the Commission Implementing Decision (EU) 2021/1299 of 4 August 2021 postponing the expiry date of approval of hexaflumuron for use in biocidal products of product-type 18. Such an extension, granted to a PBT product, only due to procedural reasons, seems quiet incoherent with the referred environmental rules and philosophy. In accordance with the precautionary principle, it would have been much more logical and respectful with environment protection to suspend the marketing during the safety assessment period, instead of prolonging its commercial life so generously.</p>
Information above is confidential	
Justification for confidentiality	
References	<a href="https://www.echa.europa.eu/documents">https://www.echa.europa.eu/documents</a> <a href="https://eur-lex.europa.eu/legal-">https://eur-lex.europa.eu/legal-</a> <a href="https://ec.europa.eu/environment/strategy/chemicals-strategy_">https://ec.europa.eu/environment/strategy/chemicals-strategy_</a>
Attachments (non-confidential information)	HEXA ECHA.docx
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 116</b>	<b>2021/10/15 13:22</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	We do termite treatments in France
Product Type	18
<b>Alternative Identity and Properties</b>	Fipronil, Permethrin, Cyperméthrin, Diflubenzuron
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	Same as hexaflumuron
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	Good.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	All the alternative active substances have been evaluated under Biocide regulation. Fipronil and Diflubenzuron formulations have been registered, including the validation of the hazard and risk. OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	OK we buy from 3 different distributors
Information above is confidential	
Justification for confidentiality	

<b>Conclusion on suitability and availability of the alternative</b>	Suitable.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Hexaflumuron should be banned or restricted to non permanent baiting.
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 117</b>	<b>2021/10/15 14:59</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential. (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del

	hexaflumurón es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	

References	
Attachments (non-confidential information)	escrito Hexaflumuron.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 118</b>	<b>2021/10/15 15:31</b>
Country	Spain
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18
<b>Alternative Identity and Properties</b>	<p>Es importante resaltar que en la Comunidad Europea son 3 los sistemas de control de termitas por medio de cebos inhibidores de la síntesis de quitina: El sistema a base de Hexaflumuron llamado Senti Tech, el sistema a base de Diflubenzuron, llamado Termigard y el sistema a base de Diflubenzuron, llamado Labyrinth de Exterra. El mecanismo de acción de los tres es muy similar, además la forma de actuación es muy parecida entre los tres. Además del cebo propiamente dicho, las estaciones, formulado etc. son casi idénticos pudiendo intercambiar cebos o dispositivos.</p> <p>También existen en el mercado productos que son protectores de la madera ante el ataque de Termitas como son los protectores líquidos y en gel de la madera, protección en autoclaves y protección mediante barreras en muro muy efectivos sobre todo cuando hay edificaciones conjuntas donde una parte se es favorable a la actuación frente a termites y en otro edificio colindante no se está dispuesto a realizar la actuación de forma que la barrera a muros permitir acotar la actuación, Estos sistemas están basados en fipronil.</p>
Information above is confidential	
Justification for confidentiality	

<b>Technical Feasibility</b>	<p>Tras largos años de trabajo y de uso con el sistema Termigard, cuya materia activa es el Diflubenzuron, permite controlar todo tipo de instalaciones siguiendo las buenas prácticas de actuación diseñadas por el fabricante. Dichas instalaciones van desde edificios unifamiliares, pueblos, barrios, cascos históricos de ciudades y pueblos. De esta forma, siguiendo el protocolo de actuación experimentado durante años por la empresa se controla todo tipo de instalaciones.. En el caso de Patrimonio Nacional se han realizado innumerables actuaciones con éxito asegurado siguiendo el protocolo de diseñado. Es por ello que no existe situación en cuanto a termes se refiere que no sea posible controlar por medio de formulados de Diflubenzurónl</p>
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	<p>Dentro de los puntos a destacar de la aternatiiva del sistema Termigard es que está abierto a todas las empresas las cuales aprenden y son ayudadas por las empresas poseedoras de los sistemas a base diflubenzuron. El cliente tiene todo en sus manos para realizar un trabajo adecuado de control de termes a unos precios del orden del 20% al 30% más económico que con el sistema Senti trech que es cerrado para unas cuantas empresas y que tiene ese sistema en exclusividad.</p>
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	<p>En el caso de nuestra empresa como en todas las empresas que utilizan el diblubenzurón, sabemos que el sistema de cebos es un biocida que requiere precauciones en la utilización El diblubenzurón está catalogado como peligroso y tóxico, pero sabemos, y esto es muy importante en ciertas aplicaciones, que el hexaflumuron está catalogado como peligroso, bioacumulativo y tóxico lo que ocasiona que no poder hacer la actuación por problemas de bioacumlación. Hay aplicaciones que no permiten el uso de productos PBT</p>
Information above is confidential	
Justification for confidentiality	



<b>Availability</b>	El TERMIGARD está en el porfolio de los productos que usan las empresas de Pest Control. Tenemos acceso mediante llamada telefónica, mail, web et. Es de uso exclusivo por personal especializado al que se accede mediante la formación correspondiente. La empresa poseedora del sistema proporciona todas las herramientas para el desarrollo del trabajo con el Termigard. Cada empresa tiene su relación con la empresa, sin contratos por medio ni exclusividades lo que permite a todas las empresas del sector acceder desde que inicia su proyecto a los recursos necesarios para la realización de su labor, con apoyo técnico por igual a todas las empresas y precios competitivos
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	Como conclusiones finales se pueden mencionar: Por nuestra posición que representamos en el sector, podemos decir que el diflubenzuron (Sistema Termigard) es un sistema alternativo al Sistema Senti Tech y que garantiza el control de termes en todo tipo de situaciones en tiempos similares a unos costes mas bajos sin ser PBT. Lo indican los datos d control de edificios unifamiliares, áreas urbanas, edificios de patrimonio nacional, cascos históricos , pueblos etc. e incluso núcleos urbanos
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	Por todo lo dicho anteriormente no nos parece acertado que se utilice un producto que sea PBT habiendo alternativas de igual o mejor actividad frente a termes. En nuestro caso actuamos con los productos que a igual competencia para el control, suponen un riesgo menor medioambiental como para las personas. No entendemos que un producto PBT se siga manteniendo habiendo alternativas comprobables
Information above is confidential	
Justification for confidentiality	
References	Museo de Bilbao Marina de Santander
Attachments (non-confidential information)	

Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 119</b>	<b>2021/10/15 18:22</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	En el documento adjunto
Product Type	18
<b>Alternative Identity and Properties</b>	La continuidad del Hexaflumurón es esencial para el control de las termitas subterráneas en Europa y en los territorios de ultra mar
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is	

confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	Consulta ECHA Hexaflumurón.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 120</b>	<b>2021/10/15 19:46</b>
Country	France
I do not wish the name of my organisation/institution to be published on the ECHA website.	1
General information	
Product Type	18

References	
Attachments (non-confidential information)	
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 121</b>	<b>2021/10/15 21:04</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	<p>El control de plagas de termitas ha experimentado un importante avance desde que se desarrollaron los métodos de cebo basados en los Reguladores de Crecimiento de los Insectos (IGR en inglés), sustancias que interfieren en el proceso de muda provocando la muerte del insecto. Además, el sistema de cebo, aplicado a las plagas de termitas (que son insectos eusociales), se aprovecha de diversos mecanismos de cohesión de la colonia para la distribución del cebo biocida (trofalaxia y acicalamiento) así mismo los procesos de limpieza del termitero para eliminar los individuos muertos, pueden incluir la necrofagia, con lo cual el producto biocida sigue distribuyéndose por la colonia. Se pretende buscar sustitutos del IRG Hexaflumurón.</p>
Product Type	18
<b>Alternative Identity and Properties</b>	<p>Actualmente en España se pueden aplicar tres productos comerciales basados en cebos con IGR: SENTRI-TECH que contiene Hexaflumurón y TERMIGARD y EXTERRA que contienen Diflubenzurón. Se pretende proponer al Diflubenzurón como sustituto del Hexaflumurón. Por mis colaboraciones con empresas de Control de Plagas he tenido oportunidad de constatar que los tres productos (uno con Hexaflumurón y dos con Diflubenzurón) son eficaces para</p>

	eliminar plagas de termitas.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	En 2008 se realizó un estudio comparando la efectividad de los principios activos de cuatro IGR's (Noviflumurón, Triflumurón, Diflubenzurón y Hexaflumurón) Gaju-Ricart et al (2008), los resultados de los dos productos comercializados en España fueron muy similares. Aunque en las características de los tres productos comercializados puede haber sutiles diferencias, desde mi punto de vista, lo más importante es la meticulosidad con la que se programa y realiza la aplicación del tratamiento, que requiere no alterar la dinámica del termitero y realizar revisiones periódicas para el mantenimiento de los cebos.
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	El coste de aplicar cualquiera de los tres productos (SENTRI-TECH, TERMIGARD, o EXTERRA) es similar, no hay importantes diferencias.
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	Las diferencias en peligrosidad de las sustancias que aquí se evalúan pueden verse en los estudios que se realizaron en 2012 para el Diflubenzurón y en 2015 para el Hexaflumurón. Diflubenzuron Assessment: <a href="https://echa.europa.eu/documents/10162/8e0b6d6d-79a7-cf0d-36de-204e6d4187e5">https://echa.europa.eu/documents/10162/8e0b6d6d-79a7-cf0d-36de-204e6d4187e5</a> Hexaflumuron Assessment: <a href="https://echa.europa.eu/documents/10162/02c698f5-a682-7707-0768-5a4e95dd76d0">https://echa.europa.eu/documents/10162/02c698f5-a682-7707-0768-5a4e95dd76d0</a> De cualquier modo, desde mi punto de vista, un aspecto es la peligrosidad de los principios activos realizadas en campo o en laboratorio y otro aspecto es el modo como estos productos se aplican para el control de las plagas de termitas (sistema de cebos) que impide en gran medida la exposición de dichos productos tanto a personas, animales o el medio ambiente. Por lo que considero que su modo de aplicación (si se hace siguiendo las recomendaciones de los respectivos fabricantes) es muy seguro.

Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	Los tres productos comercializados en España pueden ser adquiridos por las empresas de control de plagas, que deben cumplir con la normativa vigente en cuanto a los aplicadores del producto como a sus normas de uso.
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	En consideración a los descrito en los apartados anteriores considero que autorizar el Diflubenzurón para el tratamiento de plagas de termitas será beneficioso por el hecho, no sólo de ser un producto efectivo, sino porque la posibilidad de elección de alternativas puede beneficiar la competencia entre empresas aplicadoras y ello redundará en beneficios para los consumidores.
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	Gaju-Ricart M., et al., 2008. Laboratory evaluation of four benzoylphenylureas against two species of Reticulitermes Holmgren, 1913 (Isoptera: Rhinotermitidae) from Southwest Europe. THE INTERNATIONAL RESEARCH GROUP ON WOOD PROTECTION: IRG/WP 08-30472.
Attachments (non-confidential information)	2008 - Gaju y cols Laboratory evaluation of four benzoylphenylureas against two species of Reticulitermes.pdf
Attachments (confidential information)	
Justification for confidential attachment	

<b>Comment 122</b>	<b>2021/09/23 11:04</b>
Country	Spain
Name of organization/institution	ANECPLA
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	<p>Hexaflumuron is an essential biocidal active substance for termite control in the EU</p> <ul style="list-style-type: none"> <li>• Approved at EU level with authorized products in France, Spain and Portugal</li> <li>• Used by professionals for termite control in bait technology</li> </ul>
Product Type	18
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is	

confidential	
Justification for confidentiality	
References	Su, N.-Y. ; Scheffrahn, RH Laboratory evaluation of two chitin synthesis inhibitors, hexaflumuron and diflubenzuron, as bait toxicants against Formosan and eastern subterranean termites (Isoptera: Rhinotermitidae). J. Econ. Entomol. 1993, 86, 1453–1457.)
Attachments (non-confidential information)	<p>122_Attachment_Termitas y humedades en el colegio de la Barraca d'Aigües Vives _ Las Provincias.pdf</p> <p>122_Attachment_Piden ayuda para combatir una plaga de termitas en 60 viviendas de Villanueva de Tapia _ Diario Sur.pdf</p> <p>122_Attachment_La iglesia de San Sebastián de Montoro cierra por riesgo de derrumbe.pdf</p> <p>122_Attachment_Una plaga de termitas daña la estructura de medio centenar de viviendas _ Diario Sur.pdf</p> <p>122_Attachment_La catedral de Valencia, en alerta por el riesgo de derrumbe debido a las termitas.pdf</p> <p>122_Attachment_7.3. 1993_Nan-Yao&amp;Schelfrahn.pdf</p> <p>122_Attachment_Las termitas 'cierran' el Ayuntamiento de Sant Pere de Ribes _ Barcelona _ elmundo.es.pdf</p> <p>122_Attachment_La ruina de un centro de menores _ Las Provincias.pdf</p> <p>122_Attachment_Una plaga de termitas se _come_ las casas del barrio de Coín, en Málaga.pdf</p> <p>122_Attachment_¿Cuál es el enemigo más pequeño pero también más voraz de la cultura_.pdf</p>
Justification for confidential attachment	

<b>Comment 123</b>	<b>2021/10/01 12:56</b>
Country	Spain
Name of organization/institution	AESAM (Asociación Empresarial de Sanidad Ambiental de la Comunidad de Madrid)
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Hexaflumuron is an essential biocidal active substance for termite



	control in the EU • Approved at EU level with authorized products in France, Spain and Portugal • Used by professionals for termite control in bait technology  Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	The alternatives for fighting termite infestations are very limited, so doing without Hexaflumuron would be a disaster for termite control.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	We did not find any viable alternative to justify the elimination of Hexaflumuron.
Information above is	

confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	<p>Su, N.-Y. ; Scheffrahn, RH Laboratory evaluation of two chitin synthesis inhibitors, hexaflumuron and diflubenzuron, as bait toxicants against Formosan and eastern subterranean termites (Isoptera: Rhinotermitidae). J. Econ. Entomol. 1993, 86, 1453–1457.)</p>
Attachments (non-confidential information)	<p>123_Attachment_La catedral de Valencia, en alerta por el riesgo de derrumbe debido a las termitas.pdf          123_Attachment_Termitas y humedades en el colegio de la Barraca d'Aigües Vives _ Las Provincias.pdf          123_Attachment_La iglesia de San Sebastián de Montoro cierra por riesgo de derrumbe.pdf          123_Attachment_Una plaga de termitas daña la estructura de medio centenar de viviendas _ Diario Sur.pdf          123_Attachment_¿Cuál es el enemigo más pequeño pero también más voraz de la cultura_.pdf          123_Attachment_La ruina de un centro de menores _ Las Provincias.pdf          123_Attachment_Una plaga de termitas se _come_ las casas del barrio de Coín, en Málaga.pdf          123_Attachment_Argumentation -Hexaflumurón.pdf          123_Attachment_Piden ayuda para combatir una plaga de termitas en 60 viviendas de Villanueva de Tapia _ Diario Sur.pdf          123_Attachment_7.3. 1993_Nan-Yao&amp;Schelfrahn.pdf          123_Attachment_Las termitas 'cierran' el Ayuntamiento de Sant Pere de Ribes _ Barcelona _ elmundo.es.pdf</p>
Attachments (confidential information)	
Justification for confidential attachment	
<b>Comment 124</b>	<b>2021/10/06 12:52 failed</b>

Country	Spain
Name of organization/institution	Rentokil Initial España S.A.
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information (por favor referirse a los documentos adjuntos para mayor información)
Product Type	18
<b>Alternative Identity and Properties</b>	Not having hexaflumuron available would render impossible to control all damaging species of termites in Europe. As there are no alternative substances available, the use of hexaflumuron is essential (la ausencia de hexaflumuron imposibilitaría el control de todas las especies de termitas en Europa. Al no haber alternativas disponibles, el uso del hexaflumuron es esencial)
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Availability</b>	

Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	<p>124_Attachment_7.3. 1993_Nan-Yao&amp;Schelfrahn.pdf</p> <p>124_Attachment_¿Cuál es el enemigo más pequeño pero también más voraz de la cultura_.pdf</p> <p>124_Attachment_COMENTARIOS PARA CONSULTA.pdf</p> <p>124_Attachment_La ruina de un centro de menores _ Las Provincias.pdf</p> <p>124_Attachment_Una plaga de termitas daña la estructura de medio centenar de viviendas _ Diario Sur.pdf</p> <p>124_Attachment_Una plaga de termitas se _come_ las casas del barrio de Coín, en Málaga.pdf</p> <p>124_Attachment_Piden ayuda para combatir una plaga de termitas en 60 viviendas de Villanueva de Tapia _ Diario Sur.pdf</p> <p>124_Attachment_La catedral de Valencia, en alerta por el riesgo de derrumbe debido a las termitas.pdf</p> <p>124_Attachment_La iglesia de San Sebastián de Montoro cierra por riesgo de derrumbe.pdf</p> <p>124_Attachment_Termitas y humedades en el colegio de la Barraca d'Aigües Vives _ Las Provincias.pdf</p> <p>124_Attachment_Hexaflumurón Consulta sobre la autorizacion y la evaluacion comparativa en la UE_ES_20210914 (2).pdf</p> <p>124_Attachment_Las termitas 'cierran' el Ayuntamiento de Sant Pere de Ribes _ Barcelona _ elmundo.es.pdf</p>
Attachments (confidential information)	

Justification for confidential attachment	
<b>Comment 125</b>	<b>2021/10/15 15:32</b>
Country	Spain
Name of organization/institution	
I do not wish the name of my organisation/institution to be published on the ECHA website.	
General information	Please refer to attached documents for further information
Product Type	18
<b>Alternative Identity and Properties</b>	Currently, there are no less toxic or authorized candidates that can substitute hexaflumuron. The proposed prohibition of the use of hexaflumuron in the control of subterranean termites will mean that several regions can no longer effectively control certain species, let alone eradicate them.
Information above is confidential	
Justification for confidentiality	
<b>Technical Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Economic Feasibility</b>	
Information above is confidential	
Justification for confidentiality	
<b>Hazards and Risks of the Alternative</b>	
Information above is confidential	

Justification for confidentiality	
<b>Availability</b>	
Information above is confidential	
Justification for confidentiality	
<b>Conclusion on suitability and availability of the alternative</b>	
Information above is confidential	
Justification for confidentiality	
<b>Other comments</b>	
Information above is confidential	
Justification for confidentiality	
References	
Attachments (non-confidential information)	hexaflumuron Public consultation DHT.pdf
Attachments (confidential information)	
Justification for confidential attachment	