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To: ECHA
From: Bell Laboratories, Inc.
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Subject: Public Consultation – Anticoagulant Rodenticides

In the European Union, anticoagulants remain as the most effective and dominant substances for the control of rodents, thereby contributing to the well-being and quality of life which they now enjoy. Briefly, their importance is their effective control of rodents, hence preventing the following:

- Disease transmission
- Contamination of food and feedstuffs
- Structural damage
- Injury to humans and animals
- Destruction of wildlife habitats

The success in preventing the above is highly attributable to that of the responsible and effective use of anticoagulant rodenticides. Alternatives are very limited and do not offer the effectiveness sought for the control of rodents. Although not impossible, there is very little incentive for companies to develop active substances due to the high cost, and the associated business risks. Other non-chemical means are available but generally only serve as a supplement to effectively managed rodent control programs. Furthermore, numerous risk mitigation measures have been implemented through the BPD/BPR registration process. Details of these are well described in the "Risk Mitigation Measures for Anticoagulant Rodenticides" report commissioned and prepared for the European Commission.

As a member of the Rodenticide Working Group, under the umbrella of the European Biocidal Products Forum, CEFIC, our company, Bell Laboratories, Inc. gives full support to the "Position Paper" dated 29 January 2016 already submitted under EBPF, CEFIC. This document provides further detail and reflects the position of a broad array of rodenticide manufacturers.

The renewal of anticoagulant rodenticides is essential. These effective products have been responsible for the quality of life that we are currently accustomed to not only in the European Union but in the rest of the world.

Sincerely,

John Lublinkhof, Ph.D.
Director of Regulatory Affairs