To: **Biocidal Products Committee (BPC)**

Ref.: **Justification for the renewal of the approvals for the anticoagulant rodenticides brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin.**

February 6th, 2016.

Dear Sirs /Mrs.:

Regarding the Public consultation on potential candidates for substitution related with the anticoagulant rodenticides brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin, find enclose our justification for the renewal of approvals of such rodenticides.

We consider these rodenticides to be essential for efficient and effective rodent control in order to maintain good public hygiene and protect public health.

We also make your attention on the report from independent experts (Risk Mitigation Measures (RMM) for Anticoagulant Rodenticides as Biocidal Products), commissioned by DG Environment, has been published 'with the aim of identifying the best practice available and whenever possible to define a harmonised strategy at the EU level' which 'will certainly contribute to the responsible and sustainable use of anticoagulants rodenticides, reducing the risks posed to human health, animal health and the environment by these products'.

The independent RMM report identifies the features of an ideal rodenticide and then concludes that '**It will be difficult to find a rodenticide that can meet more of the above features than the anticoagulant rodenticides**' and also that '**alternatives to AVKs are limited today**'. Although there are a number of alternative chemical rodenticides approved under the BPR, none offer the utility and efficacy provided by the AVKs as acknowledged by the experts in the RMM report.

We believe the renewal of the approvals for the anticoagulant rodenticides brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin are justified and then they could not be considered as potential candidates for substitution, at least until more alternatives for the substitution of such substances can be made available.

Best regards,