Rentokil Initial

10th February 2016

Support for the renewal for anticoagulant rodenticide active substances under the Biocidal Product Regulations (BPR).

Rentokil Initial supports the position paper submitted by CEFIC's European Biocidal Products Forum dated 29th January 2016 outlining the justification for renewal of anticoagulant substances.

Rentokil Initial, being a leading global pest control & hygiene services organisation, is integral to providing the highest level of risk management, reassurance and responsiveness for homeowner and business customers to solve their pest problems, including rodent control where anticoagulant rodenticides provide an invaluable technique in providing such services.

Rodent control is an essential requirement in the modern world with increased urbanisation, the need for food security, reduction of infrastructure damage and mitigating concerns over public health.

The implementation of an integrated pest management strategy is the corner stone of effective control to discourage the development of pest populations based on the holistic use of available protection methods and risk mitigation measures in an economical and ecologically sound manner to minimise risk to human health and the environment.

Chemical methods for population control are an important part of this strategy and the use of anticoagulant rodenticides are currently the most effective, and so dominant, substances available to pest control operators within the European Union.

Within the current European regulatory framework on biocides, it was concluded at the original authorisation stage under the Biocidal Product Directive that anticoagulants were needed for human hygiene and public health reasons as the benefits outweighed the risks of use.

This position has not changed for the renewal process under the BPR due to the intrinsic role anticoagulants play within society, even though they meet the requirements of Art.5(1) regarding exclusion criteria. Consequently, derogations outlined in Art. 5(2)(b) and (c) would still be appropriate for continued use of anticoagulant rodenticides as no suitable alternatives have been developed since the original authorisations were given or in the foreseeable future;

> *Art 5(2)(b) - it is shown by evidence that the active substance is essential to prevent or control a serious danger to human health, animal health or the environment;*
>
> *Art 5(2)(c) - not approving the active substance would have a disproportionate negative impact on society when compared with the risk to human health, animal health or the environment arising from the use of the substance.*

This view is supported in the executive summary of the DG Environment's commissioned independent report published in October 2014 on "*Risk mitigation measures for anticoagulant rodenticides as biocidal products*" by Prof. Berny *et al*.

The views considered in the report and corresponding risk mitigation measures outlined should form the foundation of the renewal process to reduce the risks posed to human and animal health as well as the environment by responsible and sustainable use of anticoagulant rodenticides as no new evidence is expected to be reviewed during the process by participating member states.

The report experts noted that though there are chemical alternatives available on the market at the present time, none offer the practicality, safety and efficacy demonstrated by anticoagulant rodenticides and is the reason why most rodent control operations within the European Union are undertaken by these compounds by pest control operators.

Non-chemical methods used as part of the integrated pest management strategy undertaken by pest control operatives for rodent control was also reviewed within the report where they were considered to work best in conjunction with rodenticides in most situations.

Though rodent proofing and modifying the environment to deny access to food and water acts as a preventative method of stopping rodent populations gaining hold in an environment, experience has shown that the use of rodent trapping techniques do have a place in rodent control of small populations, it is limited in trying to reduce an established or dispersed population in a cost-effective manner.

Overall, as a business that is considered an expert in rodent control services for nearly a century and have successfully adapted to the changing regulatory landscape, we would have great concern about the removal of anticoagulant rodenticides from the limited array of techniques for controlling rodents to protect human health and property within the European Economic Area. Rentokil Initial and industry recognises the risks associated with the use of anticoagulant rodenticides and through training ensure that rodenticide use is minimised in any control programme. We do not see any change in circumstances since the initial authorisation of the compounds to provide effective rodent control and support the views provided by the 2014 expert report for continued use.

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