POSITION PAPER from CS3D the French association of Pest Management Services companies (DESINFECTION/ DESINSECTISATION /DERATISATION)

CS3D is the French association of Pest Management Services Companies. CS3D, as a founding member of CEPA, The European Federation of Pest Management Association, is deeply involved in harmonisation of European norm, best professional practices and Integrated Pest Management. CS3D is participating to the implementation of the Biocidal Products Regulation in France.

As requested by the current ECHA consultation regarding anti-coagulant rodenticides: CS3D strongly insist on the importance of maintaining access to anti-coagulants for trained pest professionals as long as no effective alternative to control infestations is available.

- Those baits dedicated to target species, have a limited persistence in the environment.
- Professional use of those anticoagulants by Trained Pest Professional and certified companies (such as CEPA Certification to the EN 16636) are a key issue in elimination of rodents as long as alternative solutions do not give enough results.
- Certified trained pest professionals are major actors in protecting humans, pets and food against health risks.

CS3D reminds authorities that public health issues related to contaminations are disseminated by numbers of pest including rodents .It is important to underlined, for example, that rats and mice are eating every day 10 to 15 % of food produced in the world, and they contaminate much more. They destroy insulation, cables, creating breakdowns, short circuits or fires.

Directly or through hosts, rodents have been identified as vectors (in Xavier Bonnefoy's WHO report, they are responsible for leptospira and more than 30 other diseases in humans) the use of anti-coagulants remains essential in order to manage pest populations successfully, it is a key tool in Integrated Pest Management. Others technics are used successfully such as repellent, proofing, ultra-sonic emission, traps, but it is generally not sufficient.

To secure the use of rodenticides, the French Ministry of Environment, with the contribution of the CS3D, has published a Regulation, the ninth of October 2013, establishing a compulsory program of education design in cooperation with our association for all professional users. The certificate delivered at the end of the training has to be renewed every 5 years.

Distributors cannot sell professional products such as anticoagulants to somebody who has not its certificate.

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