Fédération Suisse des Désinfestateurs
Verband Schweizerischer Schädlingsbekämpfer
Federazione Svizzera dei Disinfestatori

BPC Secretariat
Biocides Assessment Unit
European Chemicals Agency
Annankatu 18
P.O. Box 400
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Bern, Switzerland 09.02.2016

CEPA Recommendations concerning anti-coagulants

Dear Sir or Madam

I write you in behalf of the Swiss Federation of Pest Control Companies (VSS). We strongly support the arguments and recommendations of the CEPA (letter attached). The professional Pest control companies in Europe are constantly improving their services and the professionalism of their work. In Switzerland, the first company (Rentokil Initial AG) has been CEPA certified (EN16636). So the VSS strongly suggests that anti-coagulants stay accessible for trained pest management professionals, as long there is no valuable alternative.

Best regards
FSD-VSS

[redacted]

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Pest management industry recommends that anti-coagulant rodenticides remain accessible for trained pest professionals as long as there is no effective alternative

Brussels, January 2016 - In light of a the current ECHA consultation regarding anti-coagulant rodenticides, the **Confederation of European Pest Management Associations (CEPA) reiterates the importance of maintaining access to anti-coagulants for trained pest management professionals as long as no effective alternative to control infestations is readily available.**

Background

CEPA reminds authorities that although until recently no common harmonized requirement existed across Europe for the licensing and monitoring of either the pest management companies themselves, or the technicians who undertake the application, it has concluded negotiations with the European Standards Institute (CEN) and industry experts in March of 2015 for the publication of a European standard for the pest management industry. EN16636 and CEPA Certified®, its accompanying certification scheme, have since been launched and both the pest management sector and end users from relevant industries, not in the least the food industry, have begun responding by seeking certification and requesting certified operators in tender questionnaires.

EN 16636 specifies the requirements and competences that companies need in order to deliver professional pest management services. Environmental aspects and animal welfare have been taken into account during the development of the standard, which seeks to minimize any negative impacts.
The new standard also sets out the competences required for different roles (administrative, sales, professional user and person technically responsible) that contribute to the delivery of pest management services. Compliance with EN 16636, certified by a third party, will enable pest management providers to demonstrate that they have the necessary competence and know-how to deliver pest management services, that they have a management system to ensure a consistent level of quality and that they systematically minimise risks for clients and the public as well as for potential negative impacts on the environment and animal welfare. The initiative directly contributes to the implementation of IPM principles and thus to the sustainable use of biocidal products.

CEPA wishes to underline that one should remain vigilant vis à vis the public health consequences if the means to adequately control rodent populations in Europe were to be curtailed. As today no significant and effective alternative to anti-coagulant rodenticides is readily available and that a major infestation would have serious consequences for the public health situation (rodents have been identified as vectors in Xavier Bonnefoy's WHO report, 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.

CEPA recommends

- **that anti-coagulants should remain accessible for trained pest management professionals as long as no viable alternative is available to manage pests endangering the health of citizens, animals and the environment in which they live;**
- **that through the publication of its European standard (EN16636) and the promotion of certification to this standard (the CEPA Certified® scheme), CEPA contributes to identify trained and certified pest management professionals.**

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The European Professional Pest Management Industry

The European professional pest management industry plays an important role in protecting public health and keeping homes, schools, recreational areas, hotels, food manufacturers, retail companies and others safe, pest and disease-free.

The European pest management industry is worth in excess of € 3000 million, employs more than 40.000 people in 10,000 + companies throughout Europe, the majority of which are small and medium sized enterprises.

The Confederation of European Pest Management Associations (CEPA) is based in Brussels. It unites and federates 50 members representing national and regional European pest management associations as well as associates from major pest management servicing companies, manufacturers and distributors.

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