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ECHA, European Chemicals Agency
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Subject : Public Consultation ECHA

Dear Sir or Madam,

On behalf of the Board and the Technical Committee of NVPB,

The NVPB represents the majority of the Dutch Pest Control Sector.[1] The aim of NVPB is professionalization of the Pest control market, enhancing the quality of the sector by protecting human health, respecting the environment and animal welfare. In order to professionalize the pest control market NVPB developed quality standards and certification for PCO's in the Netherlands.

Importance of rodenticides
Rodents have proven to be able to transfer zoonotic diseases to humans and spread these diseases endangering public health. Being able to control rodents is essential for the protection of the public health, hygiene, ensuring food safety and preventing economic damage. Professional pest managers need an effective toolbox of (preventative) methods and means to be able to control rodents.
In the Netherlands professional pest managers work by the principles of Integrated Pest Management in the control of rodents. The information below reflects rules and legal obligations applicable to professional pest management in the Netherlands.

Integrated Pest Management (IPM)
Working with certain biocides for professional use requires education, passing exams and a permit as proof of competence.[2] Professional pest managers are educated on the principles of IPM. Monitoring and prevention are the basis of IPM.

[1] Having 50 members representing a market share of approximately 80% percent of the Dutch PCO market. In addition, NVPB has associated members.
[2] Vakbekwaamheidsbewijs biociden, Legal basis: article 17a Besluit gewasbeschermingsmiddelen en biocidenvan 5 september 2007, Link.

Mechanical or physical traps should be applied first. Anti-coagulant rodenticides can only be applied as a last resort if other non-chemical and preventative measures fail to control the rodent population. These risk-mitigation measures 'ensure that exposure of humans, animals and the environment to those active substances is minimized' within the meaning of article 5 Regulation (EU) No 528/2012.

Risk mitigating measures
Considering the abovementioned risk-mitigation measures, rodenticides are applied only when necessary and with care for human health, animal health and the environment.
In the view of NVPB risks for the safety of humans, animals and the environment can be managed by:

- A required education and a permit (proof);
- the (legally obliged) instruction of use by the Dutch competent authority;
- inspection by the government and
- private certification and controls.

NVPB developed a standard for the use of rodenticides outside buildings based on IPM in order to minimize risks for the environment, public health and ensure sustainable use in cooperation, which is approved by the Dutch Government[3]. The Competent Authority, Ctgb, confirmed the IPM standard for the use of rodenticides is sufficiently firm to mitigate risks, including secondary poisoning of birds (of pray).[4]
The labels of rodenticides in the Netherlands now require certification for this IPM standard for professional use outside buildings as from the 1st of January 2017. Suitable education on IPM and passing an exam is a precondition for certification. All certified companies shall be publicly registered.

NVPB developed the KPMB Kwaliteitssysteem (Quality System) and established an independent legal entity: KPMB. Eighteen PCO's have been certified for the KPMB Kwaliteitsssysteem.
NVPB contributed to developing a European standard for pest management: CEPA-Certified. CEPA-Certified is a professional norm based on the principles of IPM.

Certification and controls
KPMB is a so called 'scheme holder/ owner of a certification standard', which means it has a responsibility in ensuring that the norms it launches are fully compliant with laws and regulations. KPMB commits itself to deliver best quality and has a work approach based on ISO 17065 with elements of ISO 9001. KPMB works with accredited CB's.

Given the proposal of the Risk Assessment Committee of ECHA, the rodenticide anti-coagulants now fall within the scope of article 10(1) Regulation (EU) No 528/2012.

Importance of rodenticides
In practice anti-coagulants are only applied by professional pest managers as a last resort if other (non-chemical/preventative) measures fail to control the rodent population.

[3] The following governmental institutions were involved: the Ministry of Environmental Affairs, the Inspection for Environment and Transport (ILenT) and the Board for the Authorization of Plant Protection Products and Biocides (Ctgb).
[4] The (by Ctgb and ILenT approved) standard for the outside use of rodenticides to control rats, based on the principles of IPM, is available under this link.

We observe that anti-coagulants are required for proper pest management.
In the view of the NVPB Board and Technical Committee the efficacy of rodenticides is much higher than any other alternative. Rodenticides are important to be able to manage nuisance and danger of (intelligent) rodents. When using rodenticides rodents are unable to trace which bait has let to illness or death, which is important, especially in controlling the Black rat.

Issues in controlling the Black rat
In The Netherlands, the Black rat is an increasing pest which is causing more and more problems over the last years, especially in the south region of the Netherlands. Current available products (chemical and mechanical) are failing to control. We have signals that the increased population of Black rats are the result of the prohibition of concentrate rodenticide products, which are essential in creating the appropriate bait matrix for the Black rat to consume. The increase in the Black rat population is a clear signal that anti-coagulants are essential in pest control management.

Rat nuisance registration point
The NVPB established a rat nuisance registration point for the collection of data on rat nuisance. This registration point made clear there are issues in managing rats. There is an increase in the hinder of Black rats in the south region of the Netherlands. By the initiative of the municipal Leudal[5], a cooperation of municipals in the south of the Netherlands, collects data on nuisance of Black rats in order to raise attention for the issues in managing black rats.
Moreover, the National Institute for Public Health and the Environment (RIVM) recently started collecting data on rat nuisance in the Netherlands.[6] The RIVM started a pilot in 2015 on registration of rat nuisance in cooperation with many municipals.

Alternatives to rodenticides
The alternative options for rodent control would be mechanical/ physical traps or chemical alternatives such as: hydrogen cyanide, aluminium phosphide, carbon dioxide, chloralose and powdered corn cob.[7]
The mentioned mechanical/ physical traps play an important role in rodent control. Practical experience has shown that these cannot, in all cases, substitute anti-coagulant rodenticides.

The mentioned chemical alternatives all have limitations to their use (including use areas or efficacy). For example, the fumigants hydrogen cyanide and aluminium phosphide are acutely toxic and cannot be used around domestic, commercial, agricultural premises or near water courses. The use hydrogen cyanide and aluminum phosphide is limited to specially-trained professional pest control technicians.
The use of carbon dioxide and chloralose is limited to mouse control only.

There are no signals alternatives to anti-coagulant rodenticides with the same efficacy will available on the market soon.

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[5] Msc. Ms. Verboeket, Municipal Leudal.
[6] http://www.rivm.nl/Onderwerpen/W/Wilde_knaagdieren_en_zoönosen/Knaagdieronderzoek_RIVM
http://www.meldpuntongedierte.nl/nieuws
[7] In comparison with other PT 14 active substances, powdered corn is relatively new to the market. Practical experience of its use is limited and information on its efficacy from peer-reviewed literature is lacking.

In addition to the question whether anti-coagulant rodenticides can be substituted by other methods or means, you may question whether amongst the different anti-coagulants some are better than others. There is a distinction between first generation anti-coagulants and secondary anti-coagulants. The first group is less potent but has a better environmental/tox profile; and the second group is more potent and sometimes is key in fighting the more and more resistant rodents.
The NVPB considers each of the substances to have its own value and none of them is best substituted by another.

Based on the above we strongly request that the substitution principle will not lead to a further reduction of the rodenticide portfolio, since the pest control operators are already struggling to control pest infestations. The public health damage rodents can do, if not properly controlled, should not be underestimated. It should be bared in mind that there are several possibilities to sufficiently mitigate risks of the use of rodenticides: by education of professional pest control technicians and ensuring best management practices are applied by certification and independent controls.

The NVPB concludes anticoagulant rodenticides are ‘essential to prevent or control a serious danger to human health, animal health or the environment’ within the meaning of article 5 (2) b Regulation (EU) No 528/2012; and/ or further reduction of the rodenticide portfolio ‘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 anti-coagulant rodenticides’ within the meaning of article 5 (2) c Regulation (EU) No 528/2012.

Should you need any further information, please do not hesitate to contact us,

Yours faithfully,

The secretariat of NVPB