European Chemicals Agency
P.O.Box 400
FI-00120 Helsinki
Finland

Re.:Submission of information in the public consultation on potential candidates for submission under the Biocidal Products Regulation

Reference: ECHA-15-B-13-EN

Enclosed is submission of information on Intelligent Equipment for Substitution of Chemicals in Rodent Control.

Kind Regards,

Peder J. Kristensen
Project Manager

Mail: pjk@wisecon.dk
Mobile: +45 2120 6050

Enclosures:
To this letter: Information on Intelligent Equipment for Substitution of Chemicals in Rodent Control.
Enclosure 1: WiseTrap, WiseBox, WiseCam.
Enclosure 2: Wise-I
Enclosure 3: WisePlan and WisePlanPro
Enclosure 4: WiseCon products installed and in use in Europe

Reference
Submission of information in the public consultation on potential candidates for substitution under the Biocidal Products Regulation, Version 2.0, August 2015.

Preface

Rodent control can successfully be performed with intelligent solutions and systems and thus substitute rodenticides.

Introduction

Use of anticoagulants and other chemicals have for centuries been the major method to eliminate rodents, primarily rats.
In many countries pest control of rats is regulated by laws since rats have spread diseases to humans and animals.
Heavy impact on food production facilities and live-stock facilities has added to the use of anticoagulants in the control of rats.
Since the rats have been controlled primarily by anticoagulants the result is that rats have become increasingly resistant to the anticoagulants. This result hereof is the use of more and more potent anticoagulants or weaker anticoagulants in increasing volumes.
In many countries the anticoagulants used in the control of rats are now spread to almost all predators.

Meanwhile other methods to control rats without using chemicals have been introduced during the last years. These methods can substitute major quantities of chemicals used for control of rodents.

Below some of most convincing and efficient methods are described.

Confidentiality

None of enclosed information is subject to confidentiality.

Information and description of alternative to biocides used for control of rodents

1. Overall information on products

WiseTraps, WiseBoxes, WiseCam, Wise-I and Wiseplan are individual intelligent products, methods and system for extermination of rats and mice without using chemicals.
The products can be used individually or in combination and with or without intelligent communication via GSM network and internet to mobile phone or computer. The inbuild GPS shows the exact position of the equipment.
The products are designed for use indoor and outdoor – including forests, open ranges, parks and fields.

In www.wisecon.com more details on the products are informed:
WiseTrap, WiseBox, WiseCam
Wise-I
WisePlan and WisePlanPro

2. Product characteristics

WiseTrap is developed and designed for use in sewers and is available in various flexible sizes to suit above 95% of all known sewer dimensions.
Control of rats in sewers is essential as 90% of rats are found and lives in sewers.
A WiseTrap is in few minutes installed in a manhole. When the movement and heat from the rat is detected by sensors an assortment of deadly spears shoot out at high velocity and kills the rat immediately. The spears are pulled back and is ready for another shot after few minutes and the dead rat is flushed out with the sewage water.
More WiseTraps can be systemically installed in sewer systems below apartment complexes, hospitals, business units or alike according to defined strategy based on sewer drawings. Within few months the sewer system can be freed from rats.
WiseTrap communicates via GSM network with a designated mobile phone or computer or via WisePlan with a central computer.
Communication is on activity, no activity, battery level, water level in sewer and others.

WiseBox is developed and designed for use on surfaces and takes advantage of the rodents (rats and mice) innate urge to follow routes along the sides of buildings and to seek safety in for example holes.
When the rodent enters the WiseBox and activates the sensors, the trap closes and the rodent is immediately killed with an electrical current. The dead rodent is deposited in a plastic bag in a closed container and WiseBox is reactivated for next rodent.
WiseBox is charged with battery which are recharged via inbuild solar cells and can communicate with mobile phone or computer or WisePlan.
Communication is on activity, no activity, battery level, full bag and others.

WiseCam is an infrared surveillance camera for monitoring in a manhole, sewer, ceilings, basement, warehouses, restaurants, floor etc.
WiseCam is used to determine presence and location of rodents to determine exact rodent control strategy.
WiseCam ensures that a pest control program is initiated and maintained exactly and only where necessary.

Wise-I is developed and designed as a wireless system for use inside and around buildings and both monitors rodent activity and protects against them entering a building or gaining foothold in the area.
Wise-I Master is a single Master Control Box, which connects and controls up to 50 units in a wireless grid – either Wise-I Traps or Wise-I Pir or a combination of both.
Wise-I Pir is a monitoring device and a range extender.It can be used as a monitoring device to detect rodent activity in the vicinity of the sensor. It can also be mounted

directly on traditional bait and spring trap boxes to monitor any activity inside the box. As a range extender it duplicates and forward signals between 2 Wise-I units, that are otherwise out of reach. The units are especially suited for monitoring rodent activity in difficult accessible areas.
Wise-I Trap functions on 2 levels. It can both catch and kill rodents quickly and efficiently. At the same time it can detect and monitor any rodent activity in the vicinity of the trap.

Wise-I communicates with mobile phone (SMS), computer (mail) and WisePlan. Communication is on activity (kill in trap), monitoring activity, alarm and others.

WisePlan is a software program, where all communication and information from WiseTraps, WiseBoxes, and Wise-I is collected and enables the user to combine all feed back from the units and to turn it into useful information according to the individual users individual needs.
As the units communicate via the GSM network and the internet, WisePlan makes it possible for the owners of the units to receive necessary data on operational conditions. WisePlan can provide clear information for optimization of resources (manhours, relocation of inactive traps, installation of traps only on positive monitoring of rodents, and others) and still get the necessary information to ensure proper pest control.
On top of this other essential information is provided for the owner of the traps: temperature in sewers, overflow of water in sewers, time (year, day, hour, minute) and others.
WisePlan is available in 2 versions:
WisePlan for standard users.
WisePlanPro for users with many units (above 50 units)

3. Manufacturer and Provider of the products

The products are manufactured by WiseCon A/S in Denmark.
In *Enclosure 1* WiseCon A/S is described in few lines. More details can be found on www.wisecon.com, where product- and company information downloads are also found.
The products are made available via companies and distributers in most European countries and in other parts of the world.
A more detailed list of providers is found on www.wisecon.com,

More than 20.000 units are installed in Europe. A list of which units installed and used in which countries is given in Enclosure 4. Units installed and in use in countries outside Europe is not included.

Enclosure: WiseCon products installed and in use in Europe.

4. Feasibilities – technical-, economical- and hazard- feasibilities

The WiseCon products have after been on the market and used in more than 7 years proved efficiacy.
More than 20.000 units are installed and in use in Europe. During last 2 years approximately 10.000 of these units have been installed.
During January 2016 small 2000 units have been sold. Order-situation for February (1. February) is 2800 units.
It is expected that after first quarter of 2016 more than 30.000 units will be installed and taken into use – in Europe alone.
The development in installations in Europe proves the acceptance of the products in the market.
The nature of the traps ensures quick and immediate kill of the rodent while anticoagulants in many cases let the rodents die slowly in up to 9 days after the intake of first anticoagulant.
From an animal ethics point of view, the traps described are killing rodents in a much more correct way than with anticoagulants.

It has been shown/proved that by using a combination of WiseTraps, WiseBoxes and WisePlan in large property complexes, it is possible to reduce the amount of rats from really high amounts to close to none. Several thousand rats have been killed.

In a Danish municipality (with 45.000 inhibitants) the reduction in use of anticoagulants in sewer systems has over 6 years – by substituting use of ancoagulants with wiseTraps and WiseBoxes - gone from 500 kg to <10 kg per year – ***a reduction in use of anticoagulants on > 98%.*** In the same period no increase in numbers of rats on surface is seen.

Since no chemicals are included the hazard and safety risk for the workers involved is eliminated fully.

Introduction of the products on the market has faced a need to train personnel in installation and use of WisePlan and traps. A training program (1 day) for distributors and users has been implemented.

Conservatism and lack of technical skills from traditional pest controlling companies and employee has gradually been eliminated, but in the beginning it was a major issue.

Evaluations show, that compared to use of chemicals in pest control of rodents, in some cases (single trap units and small amount of traps/units) it is more expensive to use WiseCon products, while in case of large amount of units (>250) the price is at same level. At very high volumes the price for rodent control is lower than when using anticoagulants.
The major difference in in the use of manhours in the different situations.
These figures do not include capital cost but only operational cost.

WiseCon A/S | Skovgaardsvej 25 | DK-3200 Helsinge
+45 48 79 93 78 | CVR 3035 0766 | info@wisecon.dk | www.wisecon.dk

Impact on environment is extremely reduced compared to use of anticoagulants.

WiseCon´s products are approved according to relevant EU-regulations.

5. Availability

The products are available in almost all countries in Europe.

Sales organization and/or distributors is established in most countries in Europe and many countries overseas.

6. Conclusion

WiseCon provides sustainable solutions - with no chemicals involved at all - for rodent control in a combination of advanced technology and knowledge of the life of the rodents above and below ground level.
The solutions can heavily reduce the need for anticoagulants and other chemicals for extermination of rats and mice.

Enclosure: WiseCon products sold and installed in Europe

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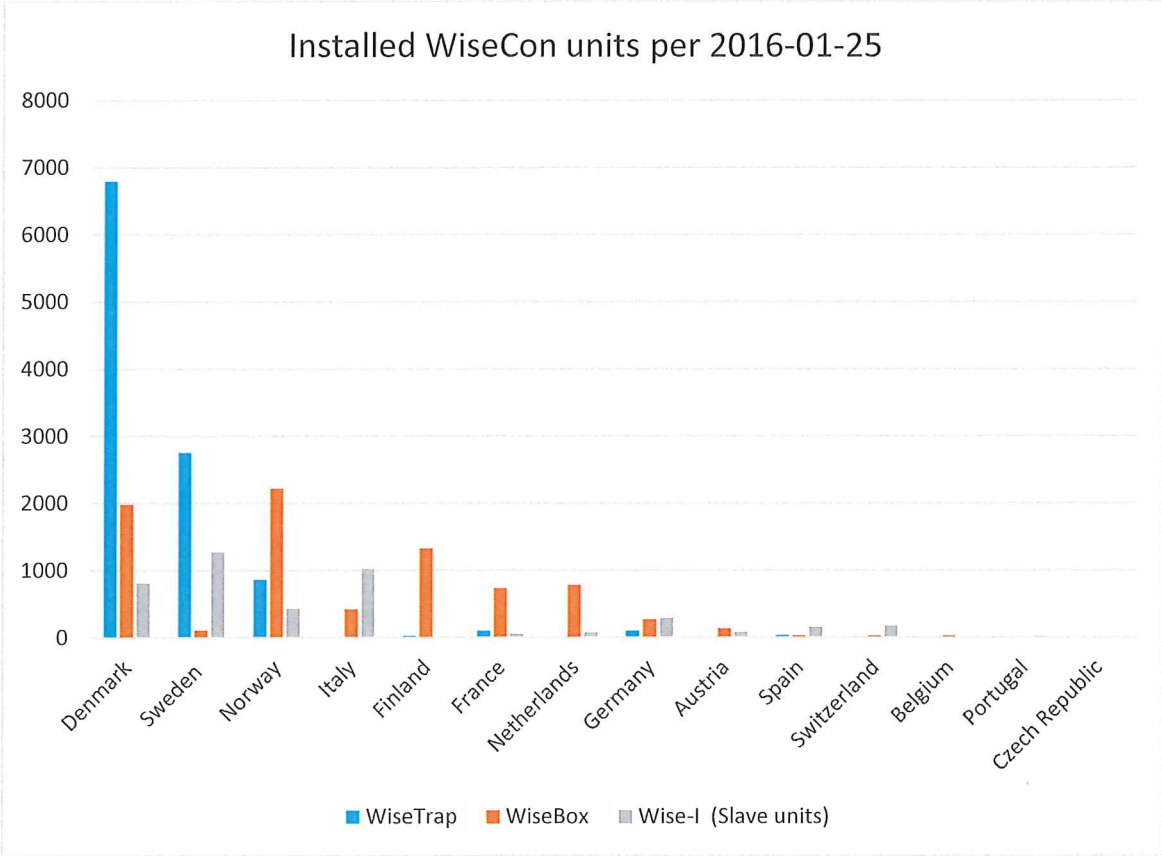
WiseCon products installed and in use in Europe 25.01.2016

Country	WiseTrap	WiseBox	Wise-I (Slave units)	Total Units
Denmark	6793	1980	810	9583
Sweden	2753	108	1272	4133
Norway	862	2220	426	3508
Italy	5	423	1019	1447
Finland	19	1330	10	1359
France	95	730	50	875
Netherlands		778	67	845
Germany	98	271	284	653
Austria	8	130	75	213
Spain	30	26	151	207
Switzerland	12	20	167	199
Belgium	4	20	5	29
Portugal	0	8	17	25
Czech Republic	5	1	0	6
Total	**10684**	**8045**	**4353**	**23082**

534 Wise-I Master units not included