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Podjetniško trgovska zbornica, Sekcija izvajalcev DDD
Dimičeva 13 ▪ 1504 Ljubljana ▪ T: (01) 58 98 312, 58 98 000 ▪ F: (01) 58 98 317 ▪ ptz@gzs.si ▪ www.gzs.si ▪ http://sddd.gzs.si/slo/

Številka: 78/bgk
Ljubljana, 11. februar 2016

BPC Secretariat
Biocides Assessment Unit
European Chemicals Agency
Annankatu 18
P.O. Box 400
FI-00121, Helsinki, Finland

Dear Sir or Madam,

The **Slovenian Association of Disinfection and Pest Control Operators** operates within the scope of the Chamber of Small Business and Trade under the auspices of the Chamber of Commerce and Industry of Slovenia.

The Slovene Association is also a member of CEPA, the Confederation of European Pest Management Associations, which strongly advocates the progress and development of the profession and the professional implementation of Pest Control measures. A certification programme pursuant to EN 16636 and CEPA Certified® and appertaining certification schemes has also been implemented in Slovenia. Although only a few months have passed since the publication of the standard, a number of responsible-minded companies in Slovenia already possess this certification.

Members of our professional association, together with colleagues from other countries concerned with the degree of general public health, the health of citizens and animals, and the protection of the environment in which we live, observe with great concern that access to anti-coagulant rodenticides will possibly be limited in the near future. Meaning that in the future, we will not have the opportunity and tools to effectively combat incidents of rodent infestation. There are no effective alternatives on the horizon.

Experienced, qualified professional Pes Control measure implementers are most patently aware of the implications of this.

Pest Control is an interdisciplinary activity, which unites and combines the knowledge and experience of experts in the fields of public health, medicine, veterinary medicine, biology, chemistry, agronomy, environmental sciences and other disciplines.

Professionally, we are seriously and more than justifiably aware of the consequences arising from a limited access to anti-coagulant rodenticides at a time when no available alternative exists. In any event, the level of protection and the safety of citizens' health will considerably decrease.

Rodents transmit viral, bacterial, protozoal diseases and diseases caused by helminths, trematodes and tapeworms to humans and animals. These potential diseases are extremely worrying.

An inability to manage rodents may, in addition to the above, result in the recurrence of diseases which we have "forgotten", that are now controlled through preventive actions using efficient products.
Due to the incomprehensible limitations set by national authorities in individual countries, we are already facing such problems.

In addition, one cannot overlook the economic aspects of using anti-coagulant rodenticides. The WHO estimates that rodents annually destroy approximately 30 million tons of food globally. The maximum damage doesn't arise from the consumption of food, but from actual and potential contamination. In addition to infrastructural damage, they also cause large fires.

- We would like to remind the Commission that we, as qualified professional implementers of Pest Control measures, responsibly and consciously use anti-coagulant rodenticides. We consider all possible risks in connection to their use and acquaint clients thereof.

- The Slovenian Association of Disinfection and Pest Control operators expects the Commission to consider the arguments put forth from all sides:

We request that the Commission enable anti-coagulant rodenticides to remain available for qualified professional implementers of Pest Control measures without restriction until available alternatives for the effective control of rodents that threaten public health, animals and the environment in which they live are made available.

Prepared by:

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Representative of Slovenian Disinfection and Pest Control Association

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