Comments submitted by: Comtec Service Limited, MT

Dear Sir / Madame,

We are a Maltese professional Pest Management Company that has been operating in Malta since 1967 and subsequently the most long-running establishment on our Islands. We are proud to state that we have always endeavoured to work in the most professional manner and the company has dedicated huge funds for our technical officials to be trained abroad and in obtaining the necessary certifications to operate safely in such an important industry locally.

Rodent control is essential, and in many cases a legal requirement to prevent disease transmission, consumption and contamination of food and feeding stuffs, structural damage and to remove social repulsion. Currently the anticoagulant rodenticides are the dominant and most effective substances for rodent control and therefore the current AVK active substances approved for PT14, will continue to be essential for efficient and effective rodent control in order to maintain good public hygiene and protect public health.

There are some alternative techniques to anticoagulant rodenticides for the management of rodent infestations, and these have always been recommended as an initial procedure by our qualified technicians, however none of these are considered to be as cost-effective and efficient as the use of efficacious rodenticide. The alternatives fall into two broad categories: Those aimed at killing rodents (e.g. traps, glue / sticky boards) and those that aim to restrict either their population size (habitat modification) or access of populations to vulnerable areas through repellents and proofing / exclusion procedures. They provide useful complementary techniques to the use of anticoagulant rodenticides for controlling rodents but are not considered to be replacements for them.

Negotiations with the European Standards Institute (CEN) and industry experts in March 2015 resulted in the publication of a European standard for the pest management industry. I personally had taken part (as a chosen representative for my country) in all committee sessions that have ultimately lead to the EN16636. The EN 16636 and the CEPA certification scheme have since been launched and both the pest management sector and end users (not in the least the food industry), have begun responding by seeking certification and requesting certified operators in tender questionnaires.

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 biological products.

One should remain vigilant towards the public 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, which could include *leptospira* and more than 30 other diseases in humans. The use of anticoagulants remains essential in order to manage pest populations successfully.

Subsequently our recommendation is:

1. That anticoagulants should remain accessible for trained pest management professional as long as no viable alternative is available to manage pests

endangering the health of citizens, animals and the environment in which they live.

2. That through the publication of a European Standard (EN16636) and the promotion of certification to this standard, the European Pest Management industry contributes to identify trained and certified pest management professionals.

Yours truly,

Comtec Service Limited