ASSOCASA RECOMMENDS THE RENEWAL OF THE APPROVALS FOR THE ANTICOAGULANT RODENTICIDES (brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin)

By the light of the recent public consultation regarding anticoagulant rodenticides, we firmly support the renewal of the approvals for the anticoagulant rodenticides brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin.

Indeed, we believe that rodent control is essential to preserve human and environmental health, to prevent disease transmission, contamination of food and feeding stuffs, to preserve integrity and functionality of human equipment and properties, to prevent structural damage and to repel social abhorrence.

Although, at the moment, there are some alternatives to chemical rodenticides approved under BPR, very few of them provide sufficient and exhaustive efficacy in counteracting the spreading of rodents. In particular, none of these alternatives has the same efficacy of anticoagulant rodenticides (AVKs), that are the object of the public consultation.

Examples of alternative chemicals are:

Alphacloralose, substance mainly used to control mouse infestations indoors. It is not approved for the control of rats.

Aluminum phosphide, which can be used only by trained-professional pest control operators. Considering the application of this chemical, it is not possible to use it near buildings as it releases toxic gas. Its use, therefore, it is not feasible in the built environments.

Hydrogen cyanide, like the previous chemical, can be used only by trained professionals and in well-closed structures.

20149 Milano, Via Giovanni da Procida 11
Tel. +39 02 34565.236
Fax +39 02 34565.320
E-mail: assocasa@federchimica.it
http://assocasa.federchimica.it

Codice fiscale 80036210153

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Carbon dioxide, which can be used only indoors to control mouse infestations.

Powdered corn cob, for which very few information on its practical uses can be retrieved. Its efficacy seems to be very limited according to public literature evidences.

Along with the aforementioned chemicals, some mechanical alternative devices for the control of rodent infestations are available in the market. These devices, however, do not present the same extent of efficacy in comparison with AVKs. For instance, glue based boards, illegal in some countries, show very scarce success in catching rodents, especially rats. Moreover, they can also trap non-target animals. There are alternative mechanic solutions, like rodent trapping or spring traps or break-back traps, but they present questionable degree of humanness and they have to be used by skilled applicators to limit negative impacts onto non-target animals. Live-capture traps present higher degree of humanness although they seem to be functional only in controlling small infestations and in particular only of mice.

All said above is especially relevant and true if we consider that the general public (i.e. non-professional end users) will no longer have the availability of AVK based rodenticides for their private use. The available chemical alternatives (listed above) are not exhaustive to grant an effective rodent control and the use of mechanical devices is totally unable to offer effective solutions, leading to the concrete risk of the spreading of rodent infestations that would become, at a certain point, out of control.

Therefore, we deem that, if the approvals of AVKs are not renewed, this decision will:

- have important consequences in the capacity to control rodents. It is a fact that the proportion and the speed of treatments made by the general public are essential to stop the spread of rodent populations within communities. If no suitable alternatives with an equivalent efficacy spectrum (i.e. against both rats and mice) are available to the general public, the restriction to the number of products available to the non-professional users could have serious consequences for public health. Indeed, if rodent control was to become completely reliant on professional operators, which can have access to those alternative chemicals with lower efficacy than AVKs, this could cause a delay in treatment of household infestations due to cost (if a private pest control operator (PCO) is used) or resources (if government funded PCOs are used). This event, in turn, could result in an increase of the associated risks to public health and society.

- have serious consequences for public health because contributing to the spreading of severe epidemiological diseases (Salmonella, Leptospirosis, Toxoplasma gondii, Cryptosporidium, Hanta Virus), thus, increasing the possibility they may become endemic, with an exponential growth of cases of infections and deaths.

Moreover, no particular scientific developments have occurred since the first approval of AVKs, which, by logical deduction, remain the most effective weapon to control rodent infestations.

On the other hand, important steps forward the direction of a sustainable use of biocidal products, among which there are AVKs, have been performed in the past years:

a) Some guideline documents have been made available to help AVK based rodenticides users to understand how to best use these products and how to limit at the minimum the side effects of their use (for instance: 'Guideline on Best Practice in the Use of Rodenticide Baits as Biocides in the European Union', EBPF (2013)).
b) Improvement in the national monitoring scheme by Poison Control Centres that offer an effective tool for the unintentional exposure to AVK based rodenticides. It is worth to mention that these substances, unlike many others, have an antidote (Vitamin K1) that may provide a therapeutic treatment in case of need.

In conclusion, there will be no benefits from the non-renewal of AVKs but only negative and significant effects for public and environmental health. AVKs are still the most effective weapon to control rodent infestations.

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