Comments submitted by: Seekers Pest and Property Services Ltd, UK

I wish to raise our objection to the proposed 'substitution' of the 8 AVK rodenticide active substances under the proposed Biocidal Products Regulations.

It is my view that these substances have a vital role to play in the protection of public health and can not be withdrawn unless viable alternative active ingredients are made available.

Alternative techniques which are being proposed such as trapping and proofing e.g. buildings have a part to play in the control of rodents but in no way can they offer a viable alternative to the protection of public health on their own.

This proposal is likely to have a negative impact on our business and I would urge that they are not removed from sale. I would however support the tightening of restrictions on the ability of purchase to those who are trained in their use to ensure they are used in a sustainable manner and according to good practice.

Technical Director
Seekers Pest and Property Services Ltd