



European Chemicals Agency  
Annankatu 18  
P.O. Box 400  
FI-00121-Helsinki  
FINLAND

**Date** : September 15, 2017  
**Subject** : NVPB response to public consultation about Cholecalciferol

Dear Madam or Sir,

On behalf of the Dutch Association for Pest Management Organisations (NVPB), I hereby respond to the public consultation initiated by ECHA about Cholecalciferol.

### **NVPB**

The NVPB represents around 90% of the turnover of the professional market for pest control in the Netherlands. The aim of the NVPB is to further improve professional pest control in the Netherlands and to enhance the quality of the services provided by pest control companies. In view of the above, protecting human health, respecting the environment and animal welfare is of crucial importance to the NVPB. In order to professionalize the pest control market, the NVPB has developed quality standards that are based on the principles of Integrated Pest Management (IPM) and certifications for pest control organisations in the Netherlands.

### **Cholecalciferol**

On behalf of the Dutch pest management industry the NVPB wishes to make a cautious and conditional contribution in light of the current ECHA public consultation regarding Cholecalciferol. In light of the current ECHA public consultation regarding Cholecalciferol, the NVPB is interested in having an additional tool to control rodents. The NVPB wishes to underline that one should remain vigilant vis à vis the public health consequences if the means to adequately control rodent populations in Europe is further curtailed. Continued access to anti-coagulants (AVK) as well as the availability of *additional* substances is therefore of paramount importance for the professional community. We would like to stress that Cholecalciferol can't be considered in any manner as a substitute to anticoagulants (AVK).

**The professional pest management community sees the introduction of Cholecalciferol, in certain conditions of use, as a welcome additional option to anticoagulants (AVK) to effectively control rodent populations.**

Should you need any further information, please do not hesitate to contact us.

Yours faithfully,

Jan Verschoor  
Secretary NVPB

