



British Pest Control Association
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ECHA public consultation on derogation to the exclusion criteria for cholecalciferol under the European Biocidal Products Regulation 528/2012 (EU BPR)

Consultation submission from The British Pest Control Association (BPCA)

As the leading UK trade association for the professional pest control industry, the British Pest Control Association (BPCA) recognises the importance of having a range of options with which to control rodent pest species for the protection of public health, animal health, food security and the environment.

In terms of rodenticides, currently, and in particular for the control of rats, there is an over-reliance on the use of anticoagulant (AVK) rodenticides.

The additional availability of Cholecalciferol based rodenticides for professional pest controllers would introduce a valuable, complementary control option alongside the continued use of anticoagulant (AVK) rodenticides.

The BPCA recognises the potential positive role which Cholecalciferol based rodenticides could have for professional pest controllers and supports the authorisation of this active substance in accordance with the derogations specified in Article 5(2) (b) and (c) of the BPR.

A recent publication on 'Anticoagulant Resistance in Rats and Mice in the UK – Current Status in 2017' published by CRRU UK¹⁾ highlights the widespread resistance of rats and mice in the UK to the second generation active substances (SGARs) difenacoum and bromadiolone. Whilst it is acknowledged that the more effective SGARs brodifacoum, difethialone and flocoumafen can now be used 'outdoors around buildings' and may to some extent alleviate the resistance pressure, increasing reliance on the same chemistry may promote resistance to these more effective actives. The BPC Opinion on cholecalciferol²⁾ states that "There is no known resistance to cholecalciferol and there is no evidence of cross-resistance to cholecalciferol" and consequently the introduction of a new chemistry will complement these existing solutions.

In terms of the environment, cholecalciferol is not classed as a PBT (persistent, bioaccumulative, toxic) substance whereas all of the SGARs are (see the BPC Opinions for more information: <https://echa.europa.eu/regulations/biocidal-products-regulation/approval-of-active-substances/bpc-opinions-on-active-substance-approval>).

Rodents pose a serious threat to human and animal health, as well as to infrastructure. Cholecalciferol is an important additional control tool for professional pest controllers in order to maintain effective rodent control. Less reliance on SGARs will reduce the chance of further resistance developing and will minimise the exposure of wildlife and the environment to ineffective products. It is considered that derogations specified in Article 5(2) (b) and (c) of the BPR are met.

It is important to note that Cholecalciferol based rodenticides should not be considered as complete replacement for anticoagulant (AVK) rodenticides. Cholecalciferol based rodenticides should be seen and authorised as a very important additional option for professional pest controllers.

In conclusion, BPCA supports the authorisation of Cholecalciferol based rodenticides for professional pest controllers as an effective addition to anticoagulant (AVK) rodenticides, providing greater flexibility in IPM and resistance management.

1) Anticoagulant Resistance in Rats and Mice in the UK – Current Status in 2017, CRRU UK, C. Prescott, M. Baxter, E. Coan, C. Jones, D. Rymer, A. Buckle. 7 November 2017.

2) Opinion on the application for approval of the active substance: **Cholecalciferol**, Product type: 14, ECHA/BPC/180/2017, 13 December 2017.

BPCA Background

BPCA is the largest UK trade body representing over 750 member companies employing over 3,500 pest control technicians with a professional interest in the control, eradication and management of public health pests. BPCA is a not-for-profit trade association acting on behalf of its members and in the interests of the UK pest management industry (see www.bpca.org.uk for details). BPCA takes its responsibilities to both public health and animal welfare seriously. The priority of BPCA's members and BPCA itself is the safety of the public, and prevention of harm by pest species. The Association advocates that pest control providers are suitably trained, qualified and audited and supports the professionalism of UK pest controllers by providing sector-leading training, qualifications, ongoing CPD and technical advice. These help assure those who require the services of a pest controller that they are provided with the highest levels of professional service.