British Pest Control Association
4a Mallard Way, Pride Park, Derby DE24 8GX
01332 294 288
enquiry@bpca.org.uk

Subject: Industry Response to:

COMMISSION IMPLEMENTING DECISION

of XXX

pursuant to Article 3(3) of Regulation (EU) No 528/2012 of the European Parliament and of the Council on monitoring traps containing attractants to insects

The UK pest control industry as represented by the British Pest Control Association (BPCA) encompassing over 70% of the professional users, manufacturers and distributors of pest control products in the UK market, is in opposition to this commission implementing decision. Non-toxic monitoring traps play an important role in helping to reduce the environmental exposure to toxic chemicals and pesticides and we believe this aligns directly with the aims of the commission and the biocides regulations.

Environmental

These non-toxic monitoring traps have been used for many years as a fundamental and essential tool of any integrated pest control management plan. The products provide vital information to the location, size and extent of pest populations and act as an early warning system. As such they allow the user to make informed decisions about the control method to be used and the area to be treated, thus preventing the unnecessary use of pesticides.

Public Health

The early warning of the presence of pests is an important tool especially against insects that carry pathogens and pose a public health issue. Monitoring traps show the presence of a pest population before people would normally become aware of them. This means treatment can happen more quickly thus reducing public health issues as well as reducing chemical use.

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The products described within the document are designed to monitor the presence and identify insects and not to control them, as defined in Annex V, PT19 to Regulation (EU) No 528/2012.

Performance

Pheromone traps

The attractant is the female sex pheromone - it only attracts males and has no effect on the females. This means the maximum percentage of the population it can affect is 50%. The trap may attract 90% of Males but this would only ever be a maximum of 45% of the total population, leaving the remaining males to mate with all present females and provide an ongoing, growing population.

The larval stage of the lifecycle of the insect causes the damage and require treatment. The adult moths are an early indication of an infestation but cause no damage themselves. Whether this in agriculture stored products or textiles, in each instance the monitoring trap alone is insufficient to prevent ongoing issues. In each case further action is required for treatment whether for professional or consumer use.

As the products are intrinsically incapable of meeting the current biocide efficacy requirements, how will any future registration process work? How is product efficacy going to be determined?

Fruit fly traps

Fruit fly monitoring traps are used as an early warning of the infestation of fruit flies and then as a tool to locate that infestation so as to reduce the need for and the amount of chemical applied to treat the problem. The fact the traps last three months is important as they can be left to work over long periods of time while there may not be an infestation, yet will still be an effective warning system by catching pests when an infestation occurs. Used in this way they provide a vital tool in locating the infestation to enable an early treatment decision to be made before a significant population establishes itself, reducing the need for chemical application. The traps will not control a population on their own; a further control method is required.

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Cockroach traps

Cockroach traps are used as an early warning of the infestation long before they would otherwise become apparent and as a tool to provide information on location and size of the population. This means that the user can make a better decision on the treatment required and reduce the need for and the amount of chemical applied to treat the problem. Again, use of traps alone is insufficient to provide control; further action has to be taken on identification of the problem.

Under the current regulations requiring 90% knockdown as product efficacy, none of these product meets the requirement. If these products are to be registered what will be the product efficacy required?

Market / Financial

The requirement to register these products through the same process used for pesticides and rodenticides and the cost of doing so will cause significant business and financial difficulty to the companies involved in this sector. The companies involved in the manufacture of these products are on the whole SMEs without the internal resources to manage a registration submission for one product, let alone multiple ones. The total market for these products is relatively small so the expected expense of registration will undoubtedly cause numerous issues. Small value niche markets where registration is not financially viable will have no monitoring tools available, and mean increased use of chemicals.

New market opportunities and new pest problems will not have access to monitoring products until the market becomes sufficiently large to warrant the expense of a registration, meaning increased use of chemicals.

Monitoring products also play an important role in protecting foodstuffs, raw materials & commodities and help businesses to maintain good hygiene levels and standards. Implementing a policy that means that all monitoring products have to go through an expensive registration/approval process as a biocide would, in our opinion cause major problems to various industries with huge potential cost consequences and perhaps a return to the use of unnecessary routine treatments using toxic pesticides.

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Existing Regulations

This implementing decision would also mean that the Biocides regulatory position is different to those that already exist in the agricultural market, where monitoring products are outside the scope of the regulations. How will this be dealt with? Some manufacturers sell the same products in the same format into the two different sectors, with the only difference being the chemical attractant used. We consider this to be an unsustainable position.

Many monitoring traps today have packaging labelling them as such, along with guidance on steps to be taken in the event a pest is caught. This implementing decision is based on a question in one country on product labelled for control, which under current regulations would be impossible to prove (90% knockdown). Rather than asking for all products to be registered, should companies that claim control on their packaging without a registration be asked to remove the product from the market or change their packaging as per the existing regulations?

Signed

Simon Forrester
Chief Executive, British Pest Control Association

On behalf of the British Pest Control Association and its Members