



Attention Mr. Pierre Choraine  
Biocides Team Coordinator  
European Commission  
DG Environment  
Unit D.3  
BU29 01/77  
B-1049 Brussels

Kraainem, 17 February 2012

Dear Pierre,

Further to your invitation to provide input on the documents distributed at the December meeting of the Product Authorisation and Mutual Recognition Facilitation Group, CEPA wishes to state that it wants to become more involved and further contribute to the debate concerning Risk Mitigation Measures for anti-coagulants.

With regards to the above documents, CEPA would like to inform you that it welcomes the EU initiative. Nevertheless, CEPA wishes to underline that one should be aware of the public health and animal welfare consequences if the means to adequately control rodent populations in Europe are curtailed.

Today no significant and effective alternative to using anti-coagulants is readily available and a major infestation (e.g. like the situation that occurred in the City of Chicago) would have serious consequences for the public health situation (leptospirosis, etc. ...).

In light of the above, CEPA advocates :

- that since "professional use/professional user" does not have the same meaning in all the Member States, CEPA proposes to replace it by "qualified use/qualified user", a 'qualified user' being a 'professional with knowledge through training';
- that CEPA does not object to the principle of restricting the handling of anti-coagulants to 'qualified users' but that this can only be achieved over time. CEPA's work with CEN on a European Standard for Pest Management Services (expected to be completed and ready for application towards the end of 2013) will contribute to facilitating that process;
- that permanent baiting should be maintained but that it should always go together with a pre-planned inspection frequency. CEPA believes that this frequency can be influenced by a number of factors (building status, type of usage, type of production, etc.) and that consequently it can only be determined on a case-by-case basis;
- the use of Integrated Pest Management (IPM), a method by which preference is given to the use of preventive measures and monitoring whilst only minimal amounts of pesticides are applied.

With regards to the proposed restrictions on areas of use, as well as on bait stations and covered bait points, more time is needed to evaluate the impact of your recommendations.

We look forward to working with you to enhance the process of mutual understanding between the pest management sector and the regulator in view of better balancing overriding environmental and public health concerns.

Sincerely,

Roland Higgins  
Director General