

Bundesanstalt für Arbeitsschutz und Arbeitsmedizin Federal Institute for Occupational

Safety and Health

## Minority position of the German Competent Authority (CA)

BPC opinion on an unresolved objection during the notification in accordance with Article 27(1) of the BPR of a PT 19 biocidal product containing peppermint oil and citronellal used to deter feral pigeons

The product operates by two different modes of action, a biocidal (PT19) mode of action due to the presence of active substances (peppermint oil and citronellal) and an optical mode of action due to UV light emission to which birds are sensitive.

In the submitted studies, no appropriate control group was included and the biocidal mode of action of the product is not proven, i.e. it has not been demonstrated that the assumed efficacy is based on the action of the biocidal ingredients peppermint oil and citronellal. It is therefore unclear why the birds avoid some of the treated areas.

Hence, the German CA doses not agree with the overall conclusion that the efficacy of the biocidal product "Bird Free" is sufficiently demonstrated.