**Biocidal Products Committee Rodent traps can be effective at controlling house mice infestations**

## Transcript

| Päivi Jokiniemi - Host | |   00:00:10:17 | 00:00:35:24  | Welcome to the Safer Chemicals Podcast. My name is Päivi Jokiniemi. Today we'll talk about this year's last Biocidal Products Committee meeting. And our main topic will be the committee's opinion on the comparative assessment of anticoagulant rodenticides. If you listened to our September episode, you already got some background to this. But if you missed it, don't worry. We'll give you a full update.

| Päivi Jokiniemi - Host |  | 00:00:36:24  | 00:00:56:18  | Will also discuss the most interesting opinions on active substances and hear how the committee is planning to harmonise and streamline its processes to get ready for the future workload. And as usual, I am joined by Erik van de Plassche, the Chair of the committee. Welcome, Eric. And thanks for being here.

| Erik van de Plassche - BPC Chair |  | 00:00:57:06  | 00:00:58:08  | Good to see you, Päivi.

| Päivi Jokiniemi - Host |  | 00:00:59:00  | 00:01:25:12  | As promised, so let's start with the comparative assessment of anticoagulant rodenticides. So you already had quite a comprehensive debate on this in your September meeting, where the different alternatives were discussed and now it was time to agree on your recommendation. I have two questions for you. Did you reach a conclusion and how was the debate that led to your opinion?

| Erik van de Plassche - BPC Chair |  | 00:01:26:15  | 00:01:48:23  | Yes, indeed Päivi, this one was the main topic. I would say this was the most interesting opinion we discussed in this meeting, which was, by the way, our first in-person meeting after a long time. So it was very good that members were in person in Helsinki to discuss this topic. First of all, we we agreed on the opinion.

| Erik van de Plassche - BPC Chair |  | 00:01:48:23  | 00:02:16:20  | So we adopted the opinion by consensus. There was one minority opinion expressed by the German authorities, but good to see that we adopted this opinion and that can then form the basis indeed for the renewal of the AVK rodenticides, which is going to take place soon. This opinion was a bit special in a sense that we had a heavy involvement of stakeholders.

| Erik van de Plassche - BPC Chair |  | 00:02:17:15  | 00:02:49:18  | Normally, we have stakeholders who are involved in the production, the manufacturing, the formulation of active substances or biocidal products. But this time we also had stakeholders who are involved in pest control and they represent, let's say, something like thousands of companies who are involved in pest control. We had biocides for Europe. CEFIC, who is representing the manufacturers of active substances, but also the formulators.

| Erik van de Plassche - BPC Chair |  | 00:02:50:06  | 00:03:36:12  | But they also have some of their clients also involved in using rodent traps. And then we had two producers of rodent traps, mechanical traps, and they also informed the meeting about their background and also informed us that they are going to form an association so they might be in the future an accredited stakeholder at ECHA. Maybe to start off with the discussion we had on chemical alternatives, because the comparative assessment is related to looking at chemical alternatives and looking at non-chemical alternatives for these AVK rodenticides.

| Erik van de Plassche - BPC Chair |  | 00:03:36:12  | 00:04:09:09  | For chemical alternatives, we didn't have that much discussion after the last meeting. There are some chemical alternatives which have been identified and these are alphachloralose, cholecalciferol and carbon dioxide and they can be alternatives for indoor control of mice or for what is called permanent baiting. I'll come back on that later. Not all of them, let's say, but for example, carbon dioxide can only be an alternative for permanent baiting.

| Erik van de Plassche - BPC Chair |  | 00:04:10:17  | 00:04:39:17  | There was some discussion, I must say, about are these really better in terms of their profile. Because what you never want when you go to a comparative assessment is that you have something like regrettable substitution. So you substituted by an alternative, which is in hindsight not really better and for cholecalciferol and alphachloralose we are not fully sure whether these are really better alternatives.

| Erik van de Plassche - BPC Chair |  | 00:04:40:09  | 00:05:02:06  | And that has to do, for example, for all for alphachloralose with the fact that recently there have been cases of pet poisoning identified. It may be a PBT, but we have to assess that during the renewal process. And cholecalciferol is, for example, endocrine disruptor while the AVK rodenticides have not been assessed with respect to that property.

| Erik van de Plassche - BPC Chair |  | 00:05:02:24  | 00:05:35:09  | But overall, the conclusion on chemical alternatives, I think was clear and straightforward. Then we move to the discussion on the non-chemical alternatives, the rodent traps, and that was the main debate of the meeting. In fact, there are two main issues. The one was what is called permanent baiting, I already referred to that. And that is a use which we added to the opinion based on the discussion in the September meeting.

| Erik van de Plassche - BPC Chair |  | 00:05:35:15  | 00:06:11:22  | So you have curative methods which you use when you have an infestation, but permanent baiting is a preventive method and there are many situations where permanent baiting can be used. For example, in the food industry, in shops, for example, in sewer systems. But it's a controversial use for sure, with AVK rodenticides as it is thought to be leading to resistance problems, but also to primary and secondary poisoning.

| Erik van de Plassche - BPC Chair |  | 00:06:12:18  | 00:06:43:05  | And for that reason, permanent baiting with AVK rodenticides is banned in some Member States and not but not in all. And also Member States have sometimes approved chemical alternatives, so cholecalciferol and alphachloralose, for example, are used for permanent baiting in some member states, but as said it is a controversial application but as said we added it to the comparative assessment.

| Erik van de Plassche - BPC Chair |  | 00:06:43:23  | 00:07:21:22  | And as a consequence of that, we had to look into whether the use of rodent traps is effective for permanent baiting. And the issue there was that we have limited information on the effectiveness of using traps for this use and to make it even more complicated, it's very difficult to assess the effectiveness also of chemicals for permanent baiting, because as you maybe can understand, if you have an infestation, then you can use your rodenticides and then you can, let's say, measure whether there are less rats.

| Erik van de Plassche - BPC Chair |  | 00:07:21:22  | 00:07:53:01  | and in the end, the infestation is disappearing. But permanent baiting is fairly difficult to assess because in principle, your rodents should not be there. So what has been done and that was a test which we received very late just before the meeting by a company who is involved in the production of rodent traps. They compared in the food industry, the use of AVK rodenticides and traps over for certain sites.

| Erik van de Plassche - BPC Chair |  | 00:07:53:01  | 00:08:24:22  | In total there were 16 and they just observed whether the bate was consumed for the AVK rodenticides and looked over the year whether in these traps mice were caught. The meeting concluded, well, there is evidence that it might be efficacious and even doubt whether it's efficacious, even for AVK rodenticides, it was a limited test, there was, let's say it was not published in a peer review journal.

| Erik van de Plassche - BPC Chair |  | 00:08:25:21  | 00:08:55:13  | This was a study summary together with some, let's say, some results, the raw data as we call it. So not easy to assess by the members. And also combined with the whole controversy about permanent baiting, what we concluded in the end is that our conclusion is, in fact, inconclusive. That we don't know at the moment whether rodent traps are effective and efficacious for permanent baiting.

| Erik van de Plassche - BPC Chair |  | 00:08:56:01  | 00:09:28:03  | So for sure there is a need to discuss this at a more regulatory level because of the concerns also with permanent baiting in general. And there are also activities ongoing, so for example, the coordination group is looking into resistance problems with permanent baiting and the efficacy working group has discussed recently how to look at effectiveness for rodenticides for this use and they also could not come to a conclusion.

 | | Erik van de Plassche - BPC Chair |  | 00:09:28:03  | 00:09:57:00  | So that was for us a reason for not to conclude. We describe the whole issue, describe the pros and cons, and then we will finalise the opinion. And that was a reason for Germany to file a minority opinion, because they consider that rodent traps are effective at this moment of time. We can already take that conclusion and that would of course have a consequence for the product renewal.

| Erik van de Plassche - BPC Chair |  | 00:09:58:05  | 00:10:27:10  | The next one then - the most important debate we had was about the use of rodent traps for indoor control of mice. There was one test available, a test carried out inside a farm which proved that the rodent trap which was used in that situation was effective. And we have agreed EU guidance on how to test the effectiveness of rodent traps.

| Erik van de Plassche - BPC Chair |  | 00:10:27:10  | 00:10:52:06  | And so the test was carried out according to the guidelines, but the issue was, is this sufficient to conclude that rodent traps are effective for indoor control of mice? And then there are several questions. So for example, we only had one type of trap which was tested and there are more traps on the market in the EU, in fact, worldwide.

| Erik van de Plassche - BPC Chair |  | 00:10:53:01  | 00:11:17:20  | And there has been a big, let's say, improvement in the development of rodent traps. Everybody is aware of that. And that was, of course, also, highlighted by the producers of rodent traps. But in fact, only one trap was tested in this specific test. So do we need to test more traps? And another question was, do we need to test more situations?

| Erik van de Plassche - BPC Chair |  | 00:11:17:20  | 00:12:00:15  | The test was about a farm. Do we need to test also, for example, in residential areas. So indeed, do we consider this one is sufficient. And the last one which was debated is that we can have different types of infestations. So you can have a light infestation up to a heavy infestation. And there were concerns expressed in this stakeholder consultation which we had, that for heavy infestations, rodent traps might have disadvantages, maybe they are effective, but maybe there are practical and economic disadvantages.

| Erik van de Plassche - BPC Chair |  | 00:12:01:14  | 00:12:28:19  | And that's a general issue. We had, in fact, in this opinion, several times statements from stakeholders where they had, let's say, conflicting statements about the use of mechanical traps or rodent traps. And it was very difficult to bring those together because we have limited information. That's for me, one of the most important aspects - that we need more information to come to conclusions in the future.

| Erik van de Plassche - BPC Chair |  | 00:12:29:18  | 00:12:59:12  | We also looked at what do we do for AVK rodenticides and in the end it was decided by the committee that this one test we had is sufficient to conclude that for indoor control you can use these traps. There were concerns expressed by stakeholders. But in the end, indeed, the committee decided that yes, rodent traps are a suitable alternative for indoor control of mice.

| Päivi Jokiniemi - Host |  | 00:13:00:03  | 00:13:02:18  | Good. What happens next?

| Erik van de Plassche - BPC Chair |  | 00:13:04:01  | 00:13:30:00  | The Commission has to prepare now a decision based on this opinion, maybe first to say it's a part of the mandate which we received. So one element is the comparative assessment. The other one is the comparison within the group of AVK rodenticides, whether one is better than the other. That part we will take later in the June meeting of next year.

| Erik van de Plassche - BPC Chair |  | 00:13:30:11  | 00:13:55:05  | But based on this comparative assessment, which we now finalised, the Commission has to prepare a decision and that will be a summary, of course, of the opinion. So laying down again the conclusions of the opinion and then some recommendations for Member States on how to move forward with product renewals.

| Erik van de Plassche - BPC Chair |  | 00:13:56:16  | 00:14:25:05  | The other thing which is important is how to deal with the upcoming new information. So as I said, there will be new information. The producers of rodent traps are doing more tests for other types of traps, for other situations. That's only the rodent trap producers but also the chemical industry. And so they will also look at outdoor uses.

| Erik van de Plassche - BPC Chair |  | 00:14:25:05  | 00:14:48:12  | They will more look at rats. The information we have now clearly showed that rodent traps cannot be used for rat control. But more tests will be done in that respect. So we have to decide how to take that information into consideration. Will we have a submission to ECHA or will it be to the Commission.

| Erik van de Plassche - BPC Chair |  | 00:14:49:10  | 00:15:17:01  | How will we amalgamate this? Will we have again a kind of a opinion, conclusion, whatever. So that's something we will need to discuss. And maybe the last one interesting to mention is that we also had some debate on rodent traps and whether there is a need for kind of an authorisation scheme. And this has been debated already for, let's say, years when this topic is coming more and more to the forefront.

| Erik van de Plassche - BPC Chair |  | 00:15:17:20  | 00:15:54:03  | There is a kind of authorisation scheme in Germany, if I'm correct. And the request from some of the members was will this be taken further? But in that sense, the Commission made clear that they have no intention to take this up related mainly to, let's say, there's enough on their plate in terms of well, we all know the review programme, authorisations, etc. so this is a topic they will not pick up when they receive the opinion on this comparative assessment for the rodenticides.

| Päivi Jokiniemi - Host |  | 00:15:54:09  | 00:16:07:10  | So some discussion continues still in the June meeting, but otherwise we can say that the comparative assessment is now done and then we close this book and open it again, in was it five years?

| Erik van de Plassche - BPC Chair |  | 00:16:07:11  | 00:16:27:21  | Yes, indeed. When the AVK rodenticides will be renewed, of course, first we will have the renewal of the active substances which will need to be done. But assuming they again will all meet the exclusion criteria, and I'm sure they do, we will have another comparative assessment of rodenticides in something like five years.

| Päivi Jokiniemi - Host |  | 00:16:28:14  | 00:16:55:06  | Okay. Thanks so much for that. I think we can now move on to the next topic and that would be the guidance on analysis of alternatives. There hasn't been one specific for biocides earlier. So ECHA was tasked to draft one and now you are about to finalise it. So to recap, what's the purpose of this guidance and what can you tell about the timing?

| Päivi Jokiniemi - Host |  | 00:16:55:06  | 00:16:56:11  | When will it be published?

| Erik van de Plassche - BPC Chair |  | 00:16:57:10  | 00:17:24:12  | Yeah, the purpose of the guidance is to provide guidance for applicants and for the evaluating competent authority, so for Member States, on how to perform the analysis of alternatives. And as you said, indeed there was no guidance before. Under REACH, there is guidance and that's what we took as a basis for the guidance for biocides.

| Erik van de Plassche - BPC Chair |  | 00:17:25:02  | 00:17:50:13  | But there was nothing before and it was a clear request from all parties to have something in place also for biocides. And that has been picked up by ECHA because there has already for years been a clear signal that we need to improve on the analysis of alternatives which is performed for active substances who are candidates for substitution.

| Erik van de Plassche - BPC Chair |  | 00:17:50:13  | 00:18:15:07  | And it's even more relevant for active substances who are considered to be meeting the exclusion criteria. So the idea was to have guidance on where you need to look at when you perform an analysis of alternatives so that, for example, does an alternative reduce the risks and what's its feasibility in terms of technicality but also in terms of economics?

| Erik van de Plassche - BPC Chair |  | 00:18:16:11  | 00:18:39:21  | So these criteria, let's say, have been addressed in the guide. It's not laid down, but there was a description on what kind of criteria you need to look at. And that's not really something new but it is good to have it. And then it also lays down formats - how would you gather information when you perform the analysis.

| Erik van de Plassche - BPC Chair |  | 00:18:39:21  | 00:19:07:04  | And also what is the role of the applicant and the role of the Member State Competent Authority in this whole process? So we had a revised version for this meeting and in the end that was agreed by the members. We will now finalise it. We will publish it maybe before the end of this year, or for sure in beginning of beginning of next year.

| Erik van de Plassche - BPC Chair |  | 00:19:07:24  | 00:19:35:02  | But the main debate in the meeting was about its applicability - when are we going to apply it. And also something which I would call expectation management, because there were concerns from some of the Member States, but also from the industry who was present that as we all know, not all active substances have been approved.

| Erik van de Plassche - BPC Chair |  | 00:19:35:16  | 00:20:07:05  | And there's a lot of activities which has to be performed by Member States and by industry. For example, for certain product types we have not evaluated 50 % of them. So how can we know what kind of alternative is on the market when we have not even assessed the majority of them? That's just one of the elements. To be clear, where we can have a certain, let's say, ambition, but the reality might be different.

| Erik van de Plassche - BPC Chair |  | 00:20:07:05  | 00:20:44:18  | So that's something which we recognised as an Agency and also, laid down in the guidance what we call a flexible approach. So we have to our understanding responded to those requests. But still there remain concerns from Member States and stakeholders. So that's why we will prepare a note for the next competent authority meeting where we will discuss or we will have some proposals on the implementation of the guidance, meaning when will we start applying it.

| Erik van de Plassche - BPC Chair |  | 00:20:45:05  | 00:21:06:19  | And also being more clear on what kind of situations do we really need it, for example, and I think that everybody agrees that when a substance is meeting the exclusion criteria, we have to do this, no doubt about it. But for other situations, we might be more flexible. So that's going to be another debate on it.

| Erik van de Plassche - BPC Chair |  | 00:21:06:19  | 00:21:19:08  | And maybe it's good that we wait for the outcome of the debate before we finalise the guidance. So now that I speak of it, maybe January would be more realistic timeline for publishing this guidance.

| Päivi Jokiniemi - Host |  | 00:21:19:14  | 00:21:21:23  | And the guidance will then be available on our website?

| Erik van de Plassche - BPC Chair |  | 00:21:21:23  | 00:21:24:21  | Yes, that will be for sure published on the website.

| Päivi Jokiniemi - Host |  | 00:21:25:08  | 00:21:32:02  | Very good. So what would you like to highlight from the active substance approvals this time?

| Erik van de Plassche - BPC Chair |  | 00:21:33:06  | 00:21:58:01  | Yeah, not that much compared to last time. We had two substances. One of them used to be called Bardap 26. But that substance has been renamed and now it's called DMPAP, for the experts in the room. But this redefinition is important because you will soon have two name. So we need to harmonise that.

| Erik van de Plassche - BPC Chair |  | 00:21:58:01  | 00:22:21:24  | Of course, now we have renamed this substance, but that was approved for product type two and four. That's a quaternary ammonium compound, we have already many in our programme and this was, let's say, just an other one, which is very similar substance as we have already seen. So approved this without too much discussion and debate.

| Päivi Jokiniemi - Host |  | 00:22:22:09  | 00:22:24:03  | And product type two and four are?

| Erik van de Plassche - BPC Chair |  | 00:22:24:14  | 00:23:00:18  | Yes, they are disinfectants. And then we had chrysanthemum extracts. We have two different ones with different extraction methods. The evaluating competent authority was Spain. And these substances came back to our meeting. We discussed them some meetings ago where we had an outstanding issue on the risk assessment for sediment. We allowed the applicant to provide more data because otherwise we were, let's say, afraid that these substances would not be approved.

| Erik van de Plassche - BPC Chair |  | 00:23:00:18  | 00:23:36:14  | And looking at that profile, the meeting was convinced that we should approve these substances so exceptionally the applicant was given the possibility to submit these data and that had now been done. And Spain had looked at those data. They performed a risk assessment, and they also proposed an approval, which was accepted by the meeting, although there was discussion around what is called large scale application of these insecticides, it's product type 18 and that's an outdoor use and large scale.

| Erik van de Plassche - BPC Chair |  | 00:23:36:14  | 00:24:23:12  | You can think about woodlands, you can think about rice plants in the southern part of Europe. And there are indeed insecticides which are used for these type of applications. And there was recently a guidance developed by our Environment Working Group looking at these type of applications and the issue wasthat looking at the profile of these substances, remember these are insecticides, so for sure, they have effects on target organisms but may also and I guess in most cases they have also effect on what is called non-target organisms.

| Erik van de Plassche - BPC Chair |  | 00:24:23:12  | 00:24:59:06  | And the issue was whether we would go that far, that we would already not approve this type of applications based on this fact that these are insecticides and the fact that we're dealing with large scale in contrast to, for example, indoor use. In the end the meeting decided we should not do this. It's also a discussion which is related to the ongoing development of guidance on pollinators, where we are working with EFSA on the guidance for the biocidal use.

| Erik van de Plassche - BPC Chair |  | 00:25:00:05  | 00:25:29:02  | And that means that in the near future we will have a scenario to assess quantitatively and qualitatively the risk for pollinators, and we also will have a guidance on whether we can introduce risk management measures for these type of applications as for this type of application, we did not have the method. We did not have sufficient information.

| Erik van de Plassche - BPC Chair |  | 00:25:29:18  | 00:25:54:03  | We did not look into the possibility of having or of introducing risk mitigation measures. We decided let's not pre-empt that discussion and that scenario, which will become available, but let's approve these substances. But for sure, when product authorisation will come and there will be an application for this large scale, then that's something which will need to be followed.

| Päivi Jokiniemi - Host |  | 00:25:55:10  | 00:26:19:09  | All right, then at the end of the meeting, you discussed how to streamline and harmonise the application processes and how companies can submit further information on their cases. Was there an agreement on this? And is there a specific reason why the committee feels that there needs to be some clarity on this?

| Erik van de Plassche - BPC Chair |  | 00:26:20:12  | 00:26:48:13  | Well first of all, we agreed on all the documents that were put forward and they all came from the Agency, from the secretariat, and they were prepared because we saw a need to streamline and harmonise the practice as we saw different practices within Member States. We saw some differences between active substance approval and union authorisation without a clear reason for having these different practices.

| Erik van de Plassche - BPC Chair |  | 00:26:48:13  | 00:27:17:12  | So the idea behind it was to harmonise and streamline. We also moved, for example, to another IT system so also these things needed to be laid down in our working procedures. So several documents, the working procedure on active substances, the working procedure on union authorisation, which was agreed upon.

| Erik van de Plassche - BPC Chair |  | 00:27:18:12  | 00:27:43:23  | We have a guidance now on how to deal with new information within the union authorisation and active substance process. That was a document which was already there, adopted years ago by the committee, and that has now been updated. So there is a revised version of that and it combines active substance and union authorisation. So we have one document for both processes.

| Erik van de Plassche - BPC Chair |  | 00:27:44:22  | 00:28:20:18  | And then we had the last document which was about union authorisation and how to handle information provided by an applicant from the submission until the adoption of the committee opinion. So then you talk about the validation process, the evaluation process by the evaluating competent authority and then last the opinion forming or peer review process. Still, I would say there are concerns expressed by stakeholders, by Cefic for example, but also by other stakeholders.

| Erik van de Plassche - BPC Chair |  | 00:28:21:11  | 00:28:55:17  | They have concerns that these documents are, I would say, a bit too strict. So that their right to be heard is to a certain extent compromised by these more strict processes and procedures. But yes, from our side, we would say the main intention is to harmonise and to streamline. So we would not like to agree with this kind of statements which were made in the committee. And then the last thing to say about this,

| Erik van de Plassche - BPC Chair |  | 00:28:55:17  | 00:29:17:23  | the Commission made an intervention that it would be good also now to look at national authorisation. So we have this practice now for union and it would also be good to see that we can apply the same principles. And by nature of course, what we do for union, we should also do for national, so also to look at these kind of principles and guidelines for national authorisation.

| Erik van de Plassche - BPC Chair |  | 00:29:18:06  | 00:29:20:17  | So that's something we have to pick up as an Agency.

| Päivi Jokiniemi - Host |  | 00:29:22:18  | 00:29:36:02  | This was the last meeting of this year. There was one important announcement made in this meeting, and it's about some changes taking place next year. Could you please tell a little bit more about this?

| Erik van de Plassche - BPC Chair |  | 00:29:37:04  | 00:30:03:15  | Yes, I can tell for sure. So I announced at the meeting that I will be leaving the Agency. So as you may know, I moved to the Netherlands with my my family. And living and working in two countries is something which is in the end, not sustainable from all perspectives. So that's why I decided to leave the agency.

| Erik van de Plassche - BPC Chair |  | 00:30:04:12  | 00:30:20:00  | And that will mean that the next meeting will not be my last one in March, but the one in June, that will be the last meeting for me. And after that, one month later, I will definitely move back to the Netherlands.

| Päivi Jokiniemi - Host |  | 00:30:20:19  | 00:30:25:18  | And what happens now? I guess we will need to find a new chair for the committee.

| Erik van de Plassche - BPC Chair |  | 00:30:26:09  | 00:30:32:17  | Yeah, we need a new chair. But I can say that the vacancy notice is already published on the website of the Agency.

| Päivi Jokiniemi - Host |  | 00:30:33:07  | 00:30:57:16  | So everyone should keep their eyes open and go and have a look at it if interested. Thank you again, Erik, for joining us. And as you said, despite the announcement, we will have Eril back with us at least for a couple of more episodes next year. Until then, don't forget to subscribe to our podcast at echa.europa.eu/podcasts.

| Päivi Jokiniemi - Host |  | 00:30:57:16  | 00:31:15:23  | We are also collecting feedback to be able to better meet your needs in the future. So please fill in our short feedback form that you can find in the episode description. Thanks for listening.