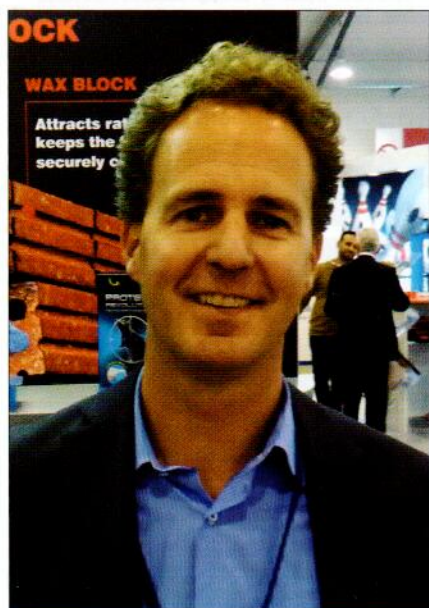




Lobbying to achieve more sustainable decisions by the European Commission

Frederic Verwilghen*



It was an initiative that came from a few and with very short notice, but with the help of a consultant, in mid-May this year, a consortium was formed and a position paper on the continued use of anti-coagulant rodenticides, was prepared and presented to the European Commission. This was all the more remarkable as the consortium was formed by 11 major producers and distributors of anticoagulant rodenticides, from 8 different countries with registrations all over Europe.

Although the Summary Product Characteristic (SPC) templates, that defines product usage, and strict Risk Mitigation Measures (RMM) were already defined and partly endorsed by Commission, the consortium wanted to present their concerns about heavy restrictions for use for the general public and especially the need to use non-refillable tamper resistant bait boxes. It was feared that such a substantial restriction in usage would lead to a series of unnecessary environmental, technical and economic issues.

For the purpose of agreeing in a joint position, a meeting was organized in Budapest with the attendance of the participating companies: Activa

(Italy), Babolna Bio (Hungary), Best Pest (Poland), GMB Internacional (Spain), Laboratorios Agrochem (Spain), Liphatech (France), PelGar (UK), Protecta (Greece), Unichem (Slovenia), Vebi (Italy), Zapi (Italy). At the request of certain members, the position paper was first presented to Cefic (The European Chemical Industry Council) and its Rodenticide Working Group and received full content support as well as back-up for presentation at the Competent Authority (CA) meeting at the end of May.

Thanks to close communication with the Policy Officer for Biocides at the European Commission, Mr. Alfonso Las Heras, who supports SME initiatives such as this, the position paper could be presented and supported at the 25th of May CA meeting. Although most country representatives already had made up their mind on the proposed SPC's and RMM's, the position of the consortium was heard and fortunately, most countries agreed and possible catastrophic consequences of such a decision. Therefore, most of the countries voted in favour of the proposed amendments by the position paper.

The European Commission and Member States decide whether to renew the approval of eight anticoagulant rodenticide active substances (chlorphacinone, coumatetralyl, warfarin, bromadiolone, difenacoum, brodifacoum, difethialone and flocoumafen). It now seems that only will the renewal be successful, but also as a result of a joint action taken by a substantial number of European SME companies, the general public will still be able to use anticoagulant rodenticides in the future, which is essential to maintain adequate public health conditions in many countries.

Although the initiative was taken at the last minute and it almost failed because of that, the united voice of manufacturers and distributors was heard and approved and it should end well. In conclusion, this exercise shows how working together people and companies can have a voice, even in the face of a complex and challenging regulatory

environment. We therefore strongly encourage industry representatives to engage in such joint initiatives! .

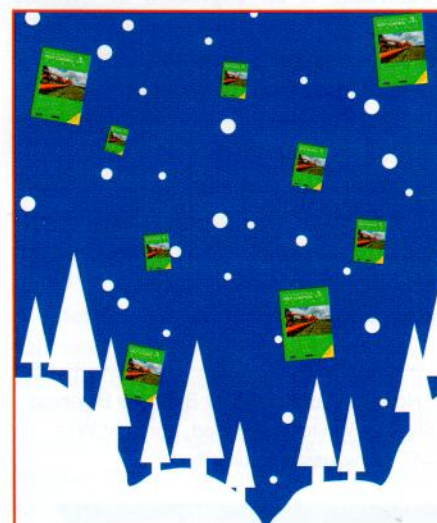
■ For further information:

RMM: <https://circabc.europa.eu/sd/a/352bffd8-babc-4af8-9d0c-a1c87a3c3afc/Final%20Report%20RMM.pdf>

SPC: https://echa.europa.eu/view-article/-/journal_content/title/new-summary-product-characteristic-editor-for-biocides-authorization

Cefic: <http://www.cefic.org/About-us/How-Cefic-is-organised/Fine-Speciality-and-Consumer-Chemicals/European-Biocidal-Products-Forum-EBPF/>

ECHA: <https://echa.europa.eu/about-us/partners-and-networks/member-states-and-competent-authorities>



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