

Active Substances Review Programme Update Focus on Rodenticides

**Industry Symposium on Rodenticide Regulation & Training,
Backweston Campus,**

7th December 2017

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Content....

- **Review Programme progress**
- **Post Review - Rodenticide Renewal**
- **Interactions & Main Impacts**
- **Reflections & Conclusions**

Review Programme

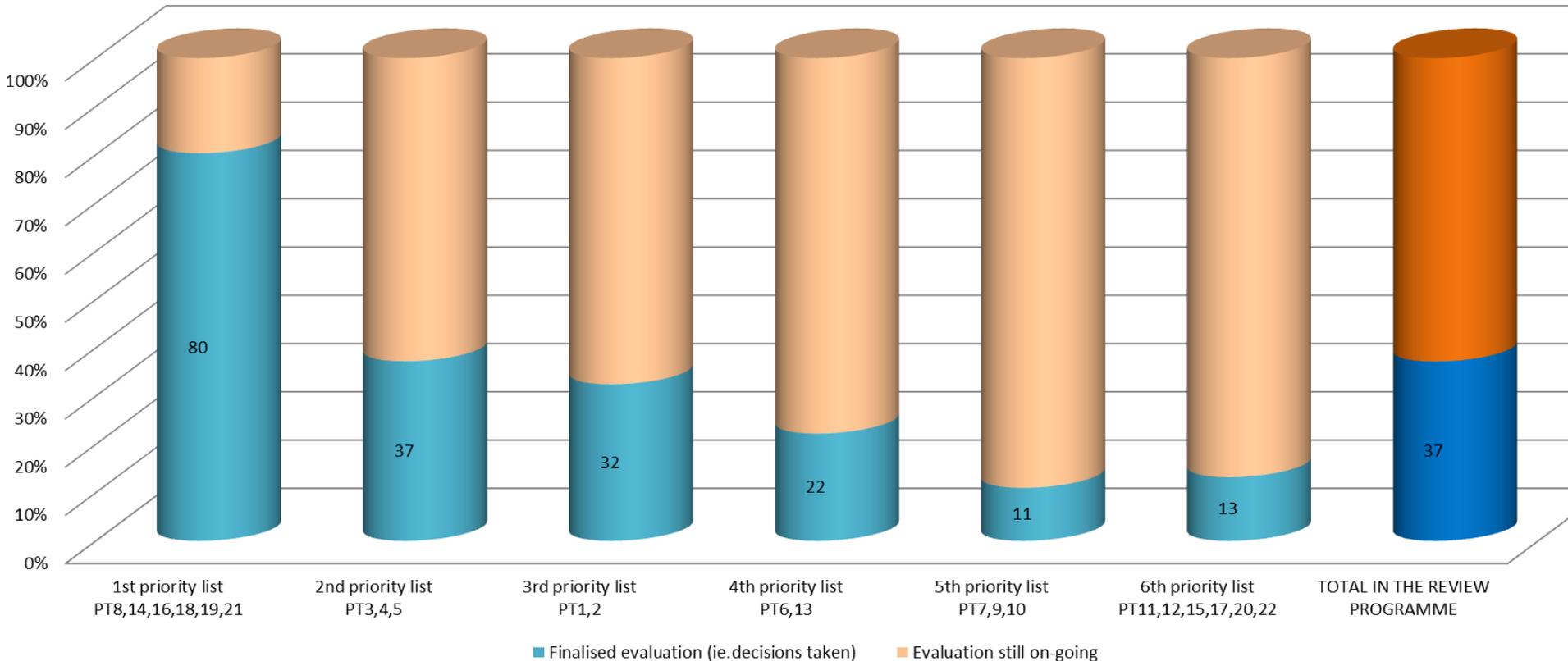


- Systematic examination of all existing actives
- On the market on **14 May 2000** as an active substance of a biocidal product
- Review Programme Regulation (EU) No 1062/2014 with subsequent amendments
- **Priority** lists and PT14

Priority List Status

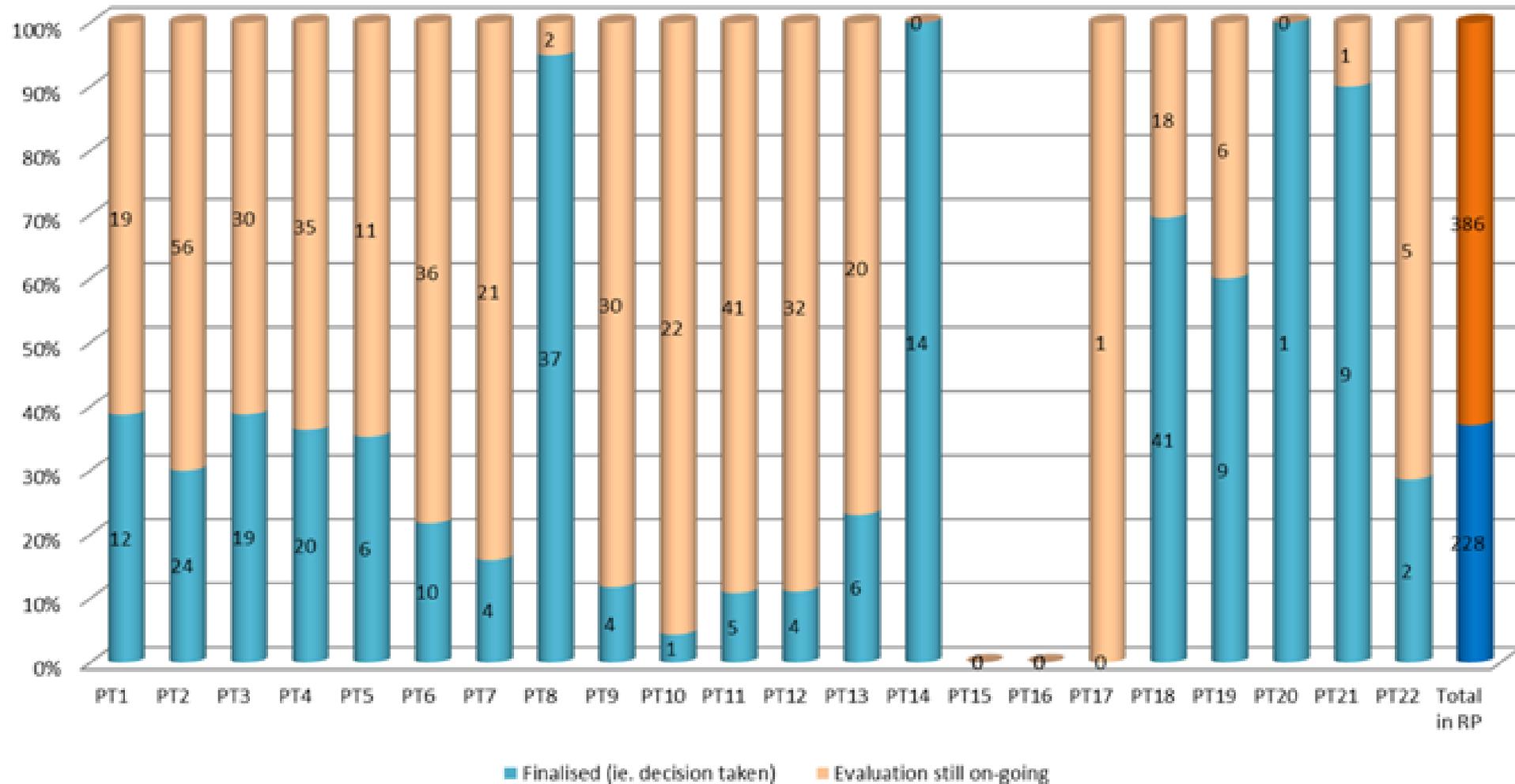
December 2017: 37% of decisions adopted

Overall progress on the review programme of existing AS per Priority list
(in percentage)



AS Per PT Status

Overall progress of the review programme of existing AS per PT



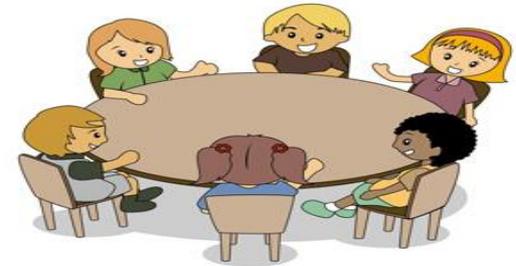
Focus on Rodenticides & Renewal: AVK Actives

- Renewal of AVK PT14 active substances
- Evaluation stage
- BPC Opinions for AVKs 16th June 2016
- Public consultations - alternatives???
- Standing Committee - up to 2024



Focus on Rodenticides & Renewal: AVK Products

- Renewal of the AVK PT14 products
- Summary of Product Characteristics
- Comparative assessment
- Influence of Implementing Regulations
- Review by rMSs - another 5 years



Interactions & Main Impacts

Interaction with AVK Renewal & Impacts

• **9th ATP** to CLP Regulation (EC) No. 1272/2008

• **Timing** - All AVK products in supply chain must comply with the new classification on 1st March 2018 (i.e. new classification means general public product < 30mg/kg). Timing implications!

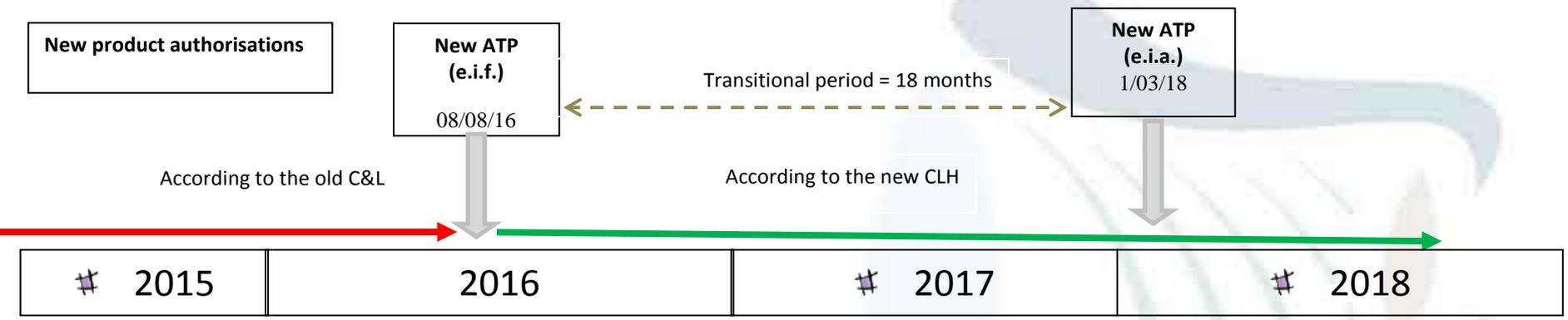
Renewals of AVKs were initially meant to be all complete before end of December 2017, however this is now not the case. The Renewals will be authorised from December 2017 to February 2018. Implications for labels.

Interactions & Main Impacts

Interaction with AVK Renewal & Impacts.....

- No market period of grace for 9th ATP.
- Only 6 month period of grace for use up.

Interactions & Main Impacts



Deadline to implement the new CLH Period of grace after 9th ATP



Changes to existing products & renewal process

End of renewal process by CAs: Between Dec 2017 – 1st March 2018

Notes on Periods of Grace:

1. 9thATP (6 months Use Only)
2. RNL (6 months market + 6 months use under BPR from the date of authorisation) but want harmony – aim to apply same periods of grace (want RNL conditions on market labels by 1/3/18)



Interactions & Main Impacts

- **Timing** - The **BPR** generally allows for 6 month market and 6 month use up, **but.....**
- All parties want to avoid **several changes to product labels** (i.e. ATP and Renewal requirements) - solution: recommend to apply all renewal requirements (i.e. RMMs etc) with 9th ATP requirements (new classification) to all AVK products on the market at the same time (**before 1st March 2018**). Avoid having to change product labels potentially **twice within a 6 month period! Change Label once.**

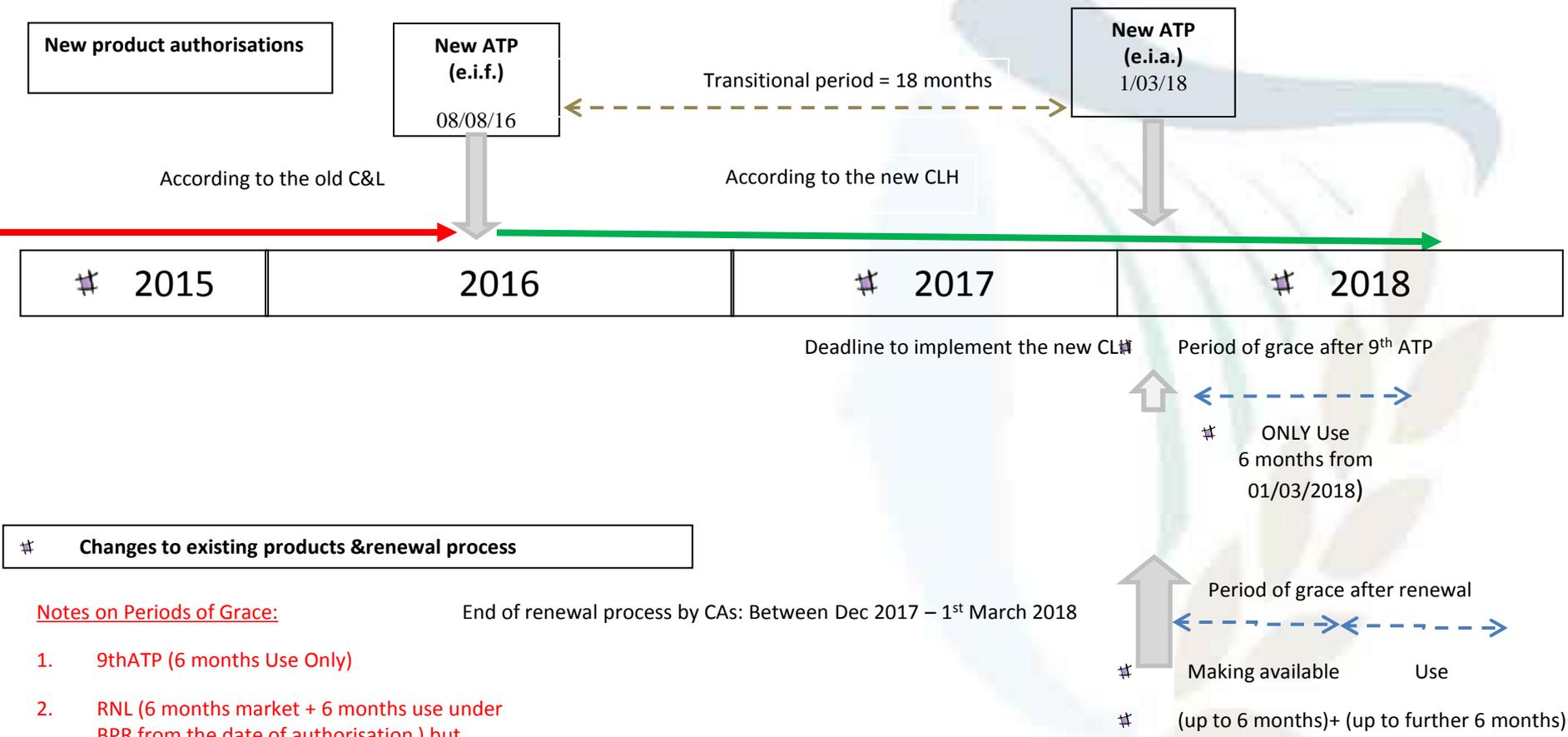


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Interactions & Main Impacts

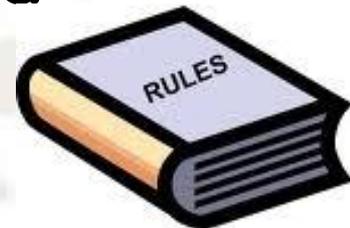


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Interactions & Main Impacts

- **What are the impacts of all this?**
- New conditions for market & use, such as
 - Availability of ≥ 30 mg/kg products
 - 3 user categories
 - Ready to use bait only
 - Use area restrictions (indoor, outdoor around buildings, outdoor open areas and waste dumps, sewers, burrows etc)



Interactions & Main Impacts

• **Further impacts.....**

- New conditions for market & use, such as
 - Min. pack size for Prof. & Trained Prof.
 - Max. pack sizes for General Public
 - Tamper Resistant Bait Boxes
 - Suppliers obligations
 - Restrictions on pulse & permanent baiting
 - Label stipulation that products are used in compliance with approved code of best practice.



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Interactions & Main Impacts



CRRU IRELAND BEST PRACTICE REQUIREMENTS

Best Practice Requirements for Rodent Control
and Safe Use of Rodenticides

Reflections & Conclusions

- Review programme moving slowly, but moving
- Considerable changes upon AVK Renewal
- Search for alternatives
- Next Renewals





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