

To the  
Biocides Assessment Unit  
European Chemicals Agency  
Annankatu 18, P.O. Box 400, Fi-00121 Helsinki  
Finland

**d-Allethrin (PT18): Public consultation on potential candidates for substitution**

**Esbiothrin (PT18): Public consultation on potential candidates for substitution**

Endura S.p.A. provides the following comments:

1. According to R4BP, there are currently no authorised alternatives on the market, i.e. no biocidal products (authorised according to the BPR) containing photolabile active substances that are not themselves candidates for substitution.
2. Biocidal products should not be restricted based on PBT criteria, if a restriction has been proven unnecessary in the risk assessment based on the intended use of the biocidal product.
3. In the interest of minimising the occurrence of pesticide resistance, exclusion and substitution of active substances should be avoided. This applies to the number of chemical groups of active substances and to the number of active substances within a chemical group. This is of particular relevance in applications where rotation of insecticides with different modes of action is not possible, for example in products to be vaporized.

According to the World Health Organization<sup>1</sup>, “One sixth of the illness and disability suffered worldwide is due to vector-borne diseases, with more than half the world’s population currently estimated to be at risk of these diseases”, substitution of biocides without adequate replacement may profoundly harm children and adults in addition to causing substantial financial and physical stress to the public health care system. There is an increasing number of outbreaks registered in Europe over the last years (e.g. Chikungunya, Dengue, West Nile Virus).

*Endura S.p.A.*  
*10 April 2017*

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<sup>1</sup> [http://apps.who.int/iris/bitstream/10665/111008/1/WHO\\_DCO\\_WHD\\_2014.1\\_eng.pdf](http://apps.who.int/iris/bitstream/10665/111008/1/WHO_DCO_WHD_2014.1_eng.pdf)