



SUSTAINABLE USE OF INSECT CONTROL PRODUCTS

**Biocidal products play an important role in the protection of society
by controlling or eliminating harmful organisms.**

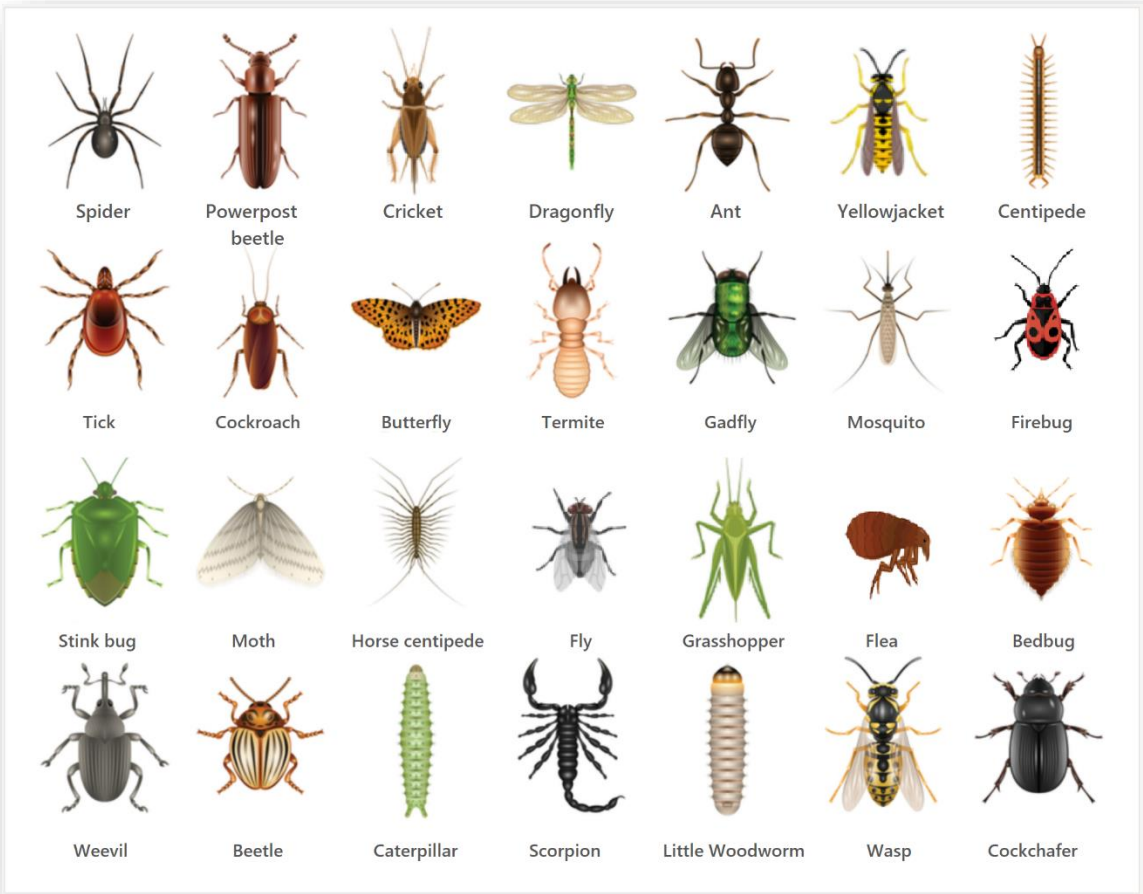
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FOREWORD

One of the main reasons some insects and other invertebrates need to be controlled is the role they play in the transmission of diseases, which are among the major causes of illness and death worldwide. In other instances, insects, mites, and other arthropods might not directly affect human or animal health but could cause substantial damage to buildings, textiles, food, feedstuffs, and significant economic impact and negative effects on quality of life.

Examples of insect and acari species – Some of them are harmful



Biocidal products play an important role in the protection of society by controlling or eliminating harmful organisms. The Biocidal Products Regulation (EU BPR, Regulation [EU] 528/2012) provides strict controls to ensure that these products are placed on the market in a safe and efficacious manner.

The EU BPR also requires the sustainable use of these products once they are placed on the market in order to ensure that their use does not cause unnecessary risk to human health, animal health and the environment (EC, 2016)¹.

Ensuring the sustainable use of insecticides and repellents (Product Types 18 & 19 under the EU BPR) is one of the objectives of the Insect Control Group of Biocides for Europe.

With this aim, we have developed this brochure to (1) briefly explain how the EU BPR controls the placing on the market of these products, (2) describe the impacts of insects on human and animal health and the environment and the need to control them, (3) clarify what Insect Control Products are and (4) set forth how the sustainable use of Insect Control Products is ensured.

This brochure closes with a summary highlighting the key messages and additional recommendations for the sustainable use of Insect Control Products.

About Biocides for Europe

Biocides for Europe, a sector group of Cefic (European Chemical Industry Council), is the voice of the European biocide business community vis-à-vis the European Commission, the European Chemicals Agency and the Member States with regard to the European biocides legislation.

Our association is involved both in policy matters around the implementation of the EU BPR and in technical issues and guidance development related to risk assessment, exposure scenarios and efficacy.

Based in Brussels, Biocides for Europe brings together more than 80 members, i.e. companies, national federations and industry associations involved in the biocides supply chain. We welcome both active substance manufacturers and biocidal product formulators. Our members cover all 22 Product Types for industrial, professional and non-professional uses.

Biocides for Europe provides a forum to inform about ongoing debates and establishes common industry positions at policy, regulatory, technical and scientific levels.

¹ COM (2016) 151 final: REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the sustainable use of biocides pursuant to Article 18 of Regulation (EU) No 528/2012 of the European Parliament and of the Council concerning the making available on the market and use of biocidal products



The Biocidal Product Regulation

Strict control

Biocidal products, such as disinfectants, wood preservatives, insecticides, insect repellents or rodenticides, are products intended to destroy or control harmful or unwanted organisms (such as viruses, bacteria, fungi, insects or vertebrate animals) that can have detrimental effects on the environment, on animals, on humans, their activities or on objects they use or produce.

To be placed on the market, a biocidal product must be proven to be safe and efficacious. With this aim, biocides are regulated by the Biocidal Products Regulation² (EU) 528/2012 - known as the EU BPR - and its implementing and delegated acts.

The objective of the EU BPR is to improve the functioning of the internal market whilst ensuring a high level of protection of human health, animal health and the environment.

This objective is achieved through the authorisation scheme of biocidal products based on a two-step approach:

- **Active substance approval:** The active substance (having the biocidal effect) must be approved at the EU level. Its hazardous properties and possible risks to humans, animals and the environment are identified and assessed.
- **Biocidal product authorisation:** Every product containing that active substance must then be authorised for each specific formulation (e.g., self-pressurised aerosol, liquid, spray, etc.), intended use (e.g., control of ticks or mosquitoes) and user category (e.g., professional users or the general public).

Sustainable use

Sustainable use of biocidal products can be defined as the objective of reducing the risks and impacts of the use of biocidal products on human health, animal health and the environment and of implementing the integrated pest management (IPM) and alternative approaches or techniques such as non-chemical alternatives to biocidal products when relevant (OECD 2021)³.

To a great extent, the sustainable use of biocides is addressed during the active substance approval and product authorisation processes. For example, based on the risk assessment, provisions to limit the use of a product to only professional users or to prohibit specific application scenarios of the product are included in the approval of the active substance or the authorisation of the product.

It should be noted that biocidal products are important tools to protect human health, animal health, and the environment and that non-chemical alternatives may not always be effective, practical, or even available. The EU BPR authorisation scheme should also ensure that a sufficient range of active substances and biocidal products remains available to achieve the objective.

² Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012

³ OECD (2021) Towards a Sustainable Use of Biocides, Series on Biocides No. 17, ENV/CBC/MONO(2021)4.



Insect Control Products

Insect Control Products are formulated to knock-down and kill and/or attract/repel, unwanted insects and are crucial for the protection against both dangerous and nuisance insects.

Insect Control Product is the term used in this brochure to refer to insecticides /acaricides and repellents/attractants that fall under Product Types 18 & 19 according to the EU BPR. Some of these Insect Control Products can also fall under other product types like PT8 for wood and wood material protection when there is an insecticidal function.

Product Type 18 (PT18) covers insecticides, acaricides and products to control other arthropods. They are designed either for indoor and/or outdoor use by professional and/or non-professional users.

They are used to control pests such as mosquitoes, flies, midges, cockroaches, ants, moths, termites, fleas, dust mites, or bed bugs. Treatment of public, commercial, or industrial buildings is performed by trained and/or certified professionals, whereas household insecticides are mainly applied by consumers (non-professionals).

Product Type 19 (PT19) covers repellents and attractants and includes both professional and non-professional users. PT19 Biocidal products are used to control harmful/annoying organisms (invertebrates such as flies, wasps, mosquitoes and ticks, vertebrates such as birds, fish, and rodents), by repelling or attracting, either directly on the skin or indirectly in the environment of humans or animals. This PT includes many products that are used for human or veterinary hygiene. Several of the active substances are naturally derived, such as essential oil extracts.

Insect Control Products have various modes of action, some disrupt the nervous system of insects, while others damage their protective exoskeletons. They also repel or control harmful insects by other means, such as preventing their normal developmental processes and can act against eggs (ovicides) or larvae (larvicides). All modes of action are important and relevant for battling the wide variety of target species' infestations.

The Need for Insect Control in the EU

Some crawling and flying insects are serious pests in and around homes, public buildings, animal housing, food processing industries, storage facilities and textiles with a negative impact on human health, animal health, food and property. Flies, mosquitoes, ticks, and other insects can carry serious, and potentially fatal, diseases including malaria, Dengue fever, chikungunya or encephalitis. Ant infestation may at times only be a nuisance, but may also be dangerous for human and animal health and result in significant economic loss.

----- TRANSMISSION OF DISEASES

One of the most crucial roles of insecticides and repellents is the control of insects for the prevention and transmission of vector-borne diseases. Vector-borne diseases are responsible for more than 17% of all infectious diseases, causing more than seven hundred thousand deaths annually (WHO fact sheet, October 2017).

Insects can carry a very wide range of disease organisms that are transmissible to humans, such as Zika virus, malaria, West Nile virus, Dengue fever, Chikungunya fever, Lyme disease and plague.

Modern humane systems of animal husbandry, which often rely on constant access of domestic stock to food, are highly prone to insect infestation because it is impossible to prevent insects from accessing them.

The spread of infectious diseases in Europe is increasing due to factors such as increased globalisation, climate change and mass human migrations.

In addition to vector-borne diseases, swarms of mosquitoes, biting midges, flies, wasps and hornets can cause painful bites and stings that affect the quality of life and/or can often result in severe allergic reactions that may endanger life.

----- SPOILING OF FOODSTUFFS

Insects can spoil virtually all foodstuffs destined for the human and animal food chains. In particular, cereals, pulses, vegetables and meats, both prior to processing and after processing, can be infested. This can result in a significant loss of value for both marketing and consumption. In addition to direct consumption, insect pests contaminate the feeding media through excretion, moulting, and their own presence in the product. Cockroaches, for example, are associated with asthma, allergies and can move microbes from unsanitary areas where they breed (in sewers for example) and deposit them on food and surfaces inside homes.

----- DAMAGE TO STRUCTURES, MATERIALS, TEXTILES

Termites and other wood-boring insects can cause severe damage to wooden structures or furniture. Beetles and moths can be responsible for substantial damage to museum objects, historic books and in buildings such as palaces or historic houses. A few species of moth are found inside buildings and are major pests, including the webbing clothes moth, which is probably the most damaging pest for textiles, fur, and feathers.

----- DISTURBANCE, ABHORRENCE, NUISANCE AND SOCIAL IMPLICATIONS

Due to the diseases that they carry, but also their association with filth, certain crawling insects are generally regarded with abhorrence by the public. The presence of insects such as cockroaches and bed bugs in inner-city areas signals neglect, affects trading in local shops and businesses, and inhibits inward investment required for regeneration.



The need for Active Substances' variety

For successful and sustainable management of insect pests, the regulatory system must ensure the availability of a sufficient number of active substances having varying modes of action to cover each target organism. This would not only guarantee that the insect control is highly targeted but also that the treatment is efficient

Insect control active substances can be classified in different ways depending on the purpose of the classification and on their properties of interest (e.g. repellent or not, contact acting versus ingestion, etc.).

-- INSECTICIDES

Many different modes of action have been described for insecticides, which can be split into groups:

- **Substances affecting nerves and muscles:**

Insecticides that act on nerve and muscle targets are generally fast-acting. Several insecticides fall into this category such as pyrethroids, carbamates, neonicotinoids, spinosyns and avermectins.

- **Substances affecting the growth development:**

Such insect growth regulators are generally slow to moderately slow-acting. They work by mimicking the Juvenile Hormone of the insect (insect growth regulators, like pyriproxyfen or s-methoprene) or by perturbing cuticle formation (chitin synthesis inhibitors, like benzoylureas) or lipid biosynthesis.

- **Substances affecting respiration:**

Several insecticides are known to interfere with mitochondrial respiration by inhibiting electron transport and/or oxidative phosphorylation (like chlorfenapyr or phosphine).

- **Substances affecting midgut:**

Bacteria-produced toxins specific to target insects, binding to receptors on the midgut membrane inducing pore formation, resulting in ionic imbalance and septicemia (*Bacillus thuringiensis* and *B. sphaericus*).

- **Unknown or non-specific:**

Several insecticides are known to affect less well-described target sites or functions, or to act non-specifically on multiple targets. Under this type, substances such as plant extracts/oils (e.g. geraniol) and/or entomopathogenic fungi (e.g. *Beauveria bassiana*) are included. Some insecticides that affect the water balance of the insect by disrupting the waxy protection of the insect, resulting in rapid water loss from the cuticle and eventually causing death by desiccation (diatomaceous earth) are also classified in this group.

As a consequence of the EU BPR, the number of active substances and their diversity in terms of mode of action have drastically decreased in Europe over the last 20 years. Before the entry into force of the EU BPR in September 2013, a number of 104 insecticidal substances existed in the European Union to control non-crop pests.

Only 58% of them (61 substances) were supported by Industry to take part in the EU biocidal products review programme, which was originally planned to last 10 years, but has now been extended twice and is currently supposed to be finalized in 2024. As of today, 39 substances are approved, 12 are still under evaluation, 8 are not approved and 2 are no longer supported. Over the last 20 years, only 5 new substances were brought to the market.

Today only 13 different modes of action are represented in Europe, and not all of them are available to control the same target species. Most of the substances approved or still under evaluation are pyrethroids (18), neonicotinoids (5), *Bacillus* spp. (4). The rest is split between 10 other classes with only 1 or 2 compounds per class, and possibly less once the evaluation of the remaining substances is completed.

Because of the inherent properties of the substances, linked to their expected performances (efficacy and residuality), insecticidal substances can meet certain PBT (Persistent, Bioaccumulative, Toxic) criteria. Out of the 44 substances approved for insect control, 11 currently meet these substitution criteria and may be phased out of the European market at some point. This will further reduce the number of solutions available on the market and the ability for the end-users to rotate products having different modes of action for a sustainable and effective result.



-- REPELLENTS/ATTRACTANTS

The repellents on the European market are sensed via the olfactory system of the insects and ticks and trigger a behavioural response that avoids direct and/or prolonged contact with the treated area. In addition, masking of attracting odours can elicit this response.

Research into the olfactory receptors and how repellent substances selectively bind and elicit agonist or anti-agonist responses has been published. Since there is no killing effect and sufficient alternative feeding options for the insects and ticks are normally available, no selection for resistant individuals can be expected in their natural habitat.

In 2000, 40 repellent/attractant substances were on the European market, but only 20 were put forward for evaluation/renewal. Today, 9 are already approved, 10 are still under review and 1 application was withdrawn. Three substances are attractants, the others are repellents.



Uses of Insect Control Products

When we talk about the uses of Insect Control Products there are several parameters that should be considered.

TREATMENT TYPE

When considering Insect Control Products in the EU, it is necessary to differentiate the two principal treatments they are applied for, curative and preventive. The former involves the removal of existing insect populations from infested areas. This type of application is often called a ‘clean-out’ or ‘curative’ treatment and it can be accomplished by either professional or non-professional users. In many situations, wherever the level of infestation is of moderate entity, non-professionals can also carry out effective treatments. The work of professional insect pest controllers is preventative and curative.

TREATMENT AREA

Insects may lead to severe negative impacts on human society in terms of disease transmission, spoiling of foodstuffs or other physical damages. Ideally, because of the pathogens that insects carry and the damage that they cause, all areas where humans live and work should be kept free of infestation.

Insects have a considerable adverse impact that occurs in all animal-rearing facilities and areas where livestock is held, such as farms where milk, meat and eggs are produced. Consequently, such areas are regularly treated with Insect Control Products, either curatively or preventatively.

Equally and for the same reasons, insects should not be present in areas where human food is produced, processed, stored, consumed and sold.

There are three major use scenarios of insect control products:

– **Indoors:**

Insect Control Products applied indoors generally reach the treated surfaces (furniture, equipment, clothes), the walls and the floor (even if not directly targeted), the user and the air inside the building. Spot or crack and crevices treatments can contribute to a sustainable use of the Insect Control Product. Very confined areas (where insects are known to harbour) are treated by surgically applying the product, and therefore avoiding unsafe emissions to the environment, especially if the treatment is followed by dry cleaning methods.

– **Outdoors, around buildings and near living areas:**

This comprises large or local scale mosquito controls through the treatment of water bodies with larvicides and through the application of adulticides. It also includes small-scale control of flying insects, ants, cockroaches, wasps and hornets.

– **In and around stables:**

Insect Control Products used in animal housing and manure storage systems are closely linked to veterinary hygiene biocidal products (PT 3) and can be applied in a variety of ways to the animal housing as well as directly to manure heaps.

All the above scenarios consider risk mitigation measures to limit any potential adverse effect on the environment, animals and humans.

Mode of Application

The location or treatment area where the Insect Control Product is used may determine the mode of application of the product. The list below gives examples of devices and modes of application of Insect Control Products:



Sprayers can include devices activated manually such as hand-held spraying via aerosol dispensers, trigger sprays, knapsack sprayers or motorized ones.

Aerosols are specific sprayers that are under pressure. They are common devices used to control insects at home. Such products represent the basic treatment of surfaces (against crawling insects) and rapid space-spray treatment for rooms (against flying insects). For outdoor treatments of wasps or hornet nests, specialised self-pressurised aerosol sprayers utilise a unique valve system. Aerosols include also one-shot aerosol cartridges (“foggers”) or self-emptying cans, usually applied by professional users.



Traps and Baits, with or without an attractant, can be used by professional and non-professional users and are designed to gather or bring the target species to a specific location for capture, kill or eradication.

Diffusers consist of a reservoir (e.g., impregnated paper, stick pack or liquid) from which the insecticide evaporates either passively or via electric heaters to produce a concentration of insecticide in a room sufficient to control flying insects. This category also includes coils or candles for outdoor use.



Dusters are often ready-to-use products which distribute Insect Control Products as a powder via a shaker, rotary pump or pressure operated duster, onto surfaces and insect tracks, to create a barrier against crawling insects.

Smoke generators contain a mixture of insecticide and a combustible filler for the fumigation of infested materials or buildings and can be used to control both flying and crawling insects.



Application to skin and clothes is typical for repellent products, which divide into body-worn and non-body-worn applications. The skin or garment applications which include sprays and lotions, are applied to human or animal skin, clothes or animal coats. Non-body worn applications are coils, candles, vapourising liquids & mats or materials impregnated with the product.



Users of Insect Control Products

Insect Control Products are used by non-professionals, professionals and trained and/or certified professionals. Although there is no definition of these types of users under the EU BPR, they can be understood as follows:

-- Non-Professional users

Non-professionals users are also referred to as the general public or consumers. They deal with smaller insect infestations in and around their homes and gardens. Their contribution to insect control is fundamental as it is impossible for PCOs (Professional Control Operators) to promptly intervene on each infestation. Most of the time, non-professional users act as the first line of defence in controlling the spread of an insect population. The products used by non-professional users are often ready-to-use (RTU) formulations, which require no mixing or loading. These products are typically sold in small and sealed bottles with devices designed to minimise exposure of the user to the product. Non-professional users are generally not expected to have received any formal training in the use of biocides and to have no access to personal protective equipment. For these products safe packaging, concise and understandable description of the instructions for use on the label are required to ensure proper use.

-- Professional users

Professional users apply Insect Control Products as a part of their working duties. This category of users includes a wide range of professionals. The pest control operator conducts treatments against a range of different pests, including insects. Pest controllers usually work in private companies, in local government or local authority structures, and in commercial enterprises. Other professionals who may apply Insect Control Products, include managers of warehouses and storage facilities, janitors of commercial and domestic buildings. Under some national rules and according to the Sustainable Use Directive (SUD) for plant protection products, farmers are also defined as professionals. The term farmer covers a broad range of user categories, from the owner of a large commercial animal-rearing facility housing thousands of animals to a smallholder producing food mainly for home consumption. Professional users would normally be expected to have received some form of training to acquire competence in the use and application of Insect Control Products.

Repellents and attractants are mainly used by the general public, but they might be used by professionals as an inherent part of their work activities, i.e., to protect themselves while at work with impregnated PPE (Protective Equipment)



Sustainable Use

-- Integrated Pest Management in Insect Control

The adoption of Integrated Pest Management (IPM) principles is fundamental for the sustainable use of Insect Control Products. Without exception, accredited training programmes for professional users underline the need of an IPM approach and explain the benefits of this strategy. In particular these programmes emphasize the role of initial site surveys in order to develop an integrated plan that involves a range of appropriate management tools.

IPM programmes rely on a combination of common-sense practices and use information on the life cycles of insect pests and their interaction with the environment. This information, in combination with available insect control methods, allows to manage the pest by the most economical means, and with the least possible risks to humans, animals, property, and the environment.

The IPM approach can be applied in almost every infested area, such as home, garden, public, commercial and industrial buildings and workplaces. IPM takes advantage of all appropriate pest management options including, but not limited to, the judicious use of biocides.

IPM is not a single pest control method but, rather, a series of pest management evaluations, decisions and controls:

PREVENTION

As a first line of pest control, IPM programmes aim to prevent insect pests from becoming a threat. These control methods can be very effective and cost-efficient and present little to no risk to people or the environment. First and foremost, insect infestations can only occur when and where insects have access to required nutrients and harbourage. Therefore, these conditions must be minimised by protecting buildings against the entrance of insects. Guidelines and specific engineering solutions are available for this purpose and it is essential that they are widely adopted.

SET ACTION THRESHOLDS

Before taking any insect control action, IPM first sets an action threshold, a point at which pest populations or environmental conditions exceed an acceptable level. Sighting a single insect does not always mean control is needed. The level at which insect pests will either become an economic, social, or health threat is critical to guide future pest control decisions.

MONITOR AND IDENTIFICATION

Not all insects require control. Many are harmless, and some are even beneficial. IPM programmes work to monitor and accurately identify them, so that appropriate control decisions can be taken in conjunction with action thresholds. Monitoring and identification will allow for the most appropriate insect control products to be used when and where they are needed.

CONTROL AND VALIDATION

Once monitoring, identification, and action thresholds indicate that insect control is required, and preventive methods are no longer effective or available, IPM programmes evaluate the proper control method both for effectiveness and risk.

Sustainable biological, physical and other non-chemical methods must be preferred to chemical methods if they provide satisfactory insect control. The insecticides applied shall be as specific as possible for the target and shall have the least side effects on human health, non-target organisms and the environment. If further monitoring, identification and action thresholds indicate that these control methods are not working, additional insect control methods would be necessary.

When a repeated application is needed available anti-resistance strategies should be applied to maintain the effectiveness of the products. This may include the use of multiple insect control products containing different active substances that display different modes of action.

An important part of IPM is the check or countercheck of the results in terms of efficacy and population control achieved throughout the program that was implemented.



-- Training of users

Training is key to ensure the sustainable use of biocidal products, especially for professional users. Professional users must have access to appropriate training and – where applicable – established certification systems. Member States (MS) have different certification schemes or training requirements for biocides.

- Training provided in accordance with the requirements of EU occupational health and safety legislation.
- Training as part of a certification/licensing scheme provided at dedicated training facilities.

In some cases, product-specific certification/licensing schemes are established in addition to general certification schemes. In some MS, which have no general certification/licensing scheme, specific training requirements and/or certification/licensing have been introduced for specific products in the pest control area (EC, 2016)⁴. Based on a review of existing certification/licensing systems in MS, this aspect is already well advanced in the field of disinfection and pest control and will be aided by the implementation of the voluntary EN 16636 standards for pest management services.

EN 16636, approved by the CEN in 2015 is the new European Standard, which specifies the requirements and competences that companies need to acquire for the delivery of professional pest management services. Environmental aspects and animal welfare have been considered during the development of the standard, which seeks to minimise any negative impacts. The new standard also sets out the competencies required for different roles (administrative, sales, professional user, technical responsible person) that contribute to the delivery of pest management services.

Other training options such as the ones listed below are usually available for professional users:

- External training provided by organisations, industry associations, consultants, ministries/regulatory bodies and educational institutions.
- Internal training organised by companies.
- Internal leaflets and presentations.
- Technical manuals and other training literature, such as a cleaning protocol.
- Technical service representatives who will provide on the job advice and training to ensure that products are used correctly.
- Videos on the correct use and application, as well as information available on the product website or product label.
- Technical support by telephone and email.
- Codes of best practice.

⁴ COM (2016) 151 final: REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the sustainable use of biocides pursuant to Article 18 of Regulation (EU) No 528/2012 of the European Parliament and of the Council concerning the making available on the market and use of biocidal products



-- Additional Recommendations for the Sustainable Use of Insect Control Products in the EU

- Increase public awareness of IPM so preventive measures can be used prior to the application of chemical control methods that are available for consumer use.
- Intervene only where control measures are deemed necessary. In this case, an integrated approach is required using sustainable biological, physical, and other non-chemical methods that can be used as an alternative to/or in combination with biocidal products.
- Harmonize the training for the use of biocidal products in the EU.
- Promote voluntary standards from industry including best practice documents for the sustainable use of biocides.
- Provide economic incentives from Member States to encourage the sustainable use of biocidal products.
- Perform further research on the efficacy of complementary methods as well as best practices on the use of biocidal products are required.
- Generate more data is required on the efficacy and benefits of using non-chemical alternatives for insect control, since currently only a few studies are available.
- Investigate further how alternative methods (e.g. genetic manipulation of insects) can be used in IPM, including the efficacy and in particular perform field trials and the effects on populations and ecosystems.

Conclusion

Commissioner Sinkevičius stated in his intervention during the Environment Council meeting on 6th October 2021: “*Biocidal products play an important role in our daily lives. For instance, insecticides and disinfectants are essential in controlling vector borne diseases and infections from transmissible diseases and the challenges of the Covid 19 pandemic has clearly demonstrated their importance to us. The BPR establishes ambitious objectives for the protection of the human health and the environment and is designated to ensure that only safe and efficient biocidal products are placed on the European market*”.

The EU BPR also requires the sustainable use of biocidal products like Insect Control Products. In this context, Biocides for Europe considers access to a wide variety of active substances with different mode of action, and equally to a wide variety of products that are fit for purpose, as paramount to effectively fight against the different pests today and tomorrow. While such variety is crucial, it must not lead to any excessive use of Insect Control Products.

Efficacious and safe products with clear and educational label instructions, developed by the biocide industry, in combination with Integrated Pest Management principles and the training of professional users, are the key elements in ensuring the sustainable use of Insect Control.



A sector group of Cefic 

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Cefic members form one of the most active networks of the business community, complemented by partnerships with industry associations representing various sectors in the value chain. As a sector group of Cefic, a full list of Biocides for Europe members is available on our website: <https://www.biocidesforeurope.org/about-us/membership/>

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