

Development of Legislation and Other Instruments

BPC-31: Minority opinion on BPC opinion on union authorisation of INSECTICIDE HOUSEHOLD SPRAY

The Swedish Chemicals Agency is concerned about the decision taken by the Biocidal Products Committee to propose to authorise a product family consisting of home-use sprays containing permethrin and s-methoprene against insects (fleas and ticks).

The products are expected to be used by consumers in households with pets, for example cats and dogs. We are of the opinion that the risk to pets, especially cats, has not been sufficiently investigated and that prescribed risk mitigation measures are not sufficiently precautionous.

Cats are known to be particularly sensitive to permethrin. However, a precise toxic dose of permethrin in cats has not yet been established. Moreover, there is a wide variation in sensitivity to the substance among cats, further complicating the setting of a minimum toxic dose. It should also be taken into account that many cats most probably will be simultaneously treated with veterinary products that may include permethrin or other pyrethroid substances. While decisions about product authorisations cannot be based on risks from other uses, we believe that the proposed biocidal use will contribute to a combined exposure in a way that is difficult to quantify and practically impossible to control.

Due to these uncertainties, we are not sufficiently confident that sensitive cats will not risk developing symptoms of toxicity if exposed to the product. Therefore, we are not satisfied with the risk mitigation measure to keep cats away from treated surfaces without a specified time limit. Since the product is claimed to be effective for 6 months, a cat would need to be kept away from treated furniture for at least 6 months. In our opinion, this is not feasible, and we therefore request that this product should not be used in households where cats live.

In addition, making reference to recent discussions at meetings of competent authorities (CA) and Forum sub-group on BPR (BPRS) about textiles treated with permethrin, we would like to draw attention to the fact that resistance to permethrin has been detected among both fleas and ticks (1,2). Some of the textiles were intended for pets. We consider that products that will have questionable efficacy should not be authorised and that products which are efficacious should be used prudently.

1) Eiden, A. L., P. E. Kaufman, F. M. OI, S. A. Allan and R. J. Miller (2015). "Detection of Permethrin Resistance and Fipronil Tolerance in *Rhipicephalus sanguineus* (Acari: Ixodidae) in the United States." *Journal of Medical Entomology* 52(3): 429-436.

2) Rust, M. K. (2016). "Insecticide Resistance in Fleas." *Insects* 7(1).

Swedish Chemicals Agency

Mailing address	Visit & delivery	Invoicing address	Phone & fax	Internet	VAT No
Box 2 SE-172 13 Sundbyberg Sweden	Esplanaden 3A SE-172 67 Sundbyberg Sweden	FE 124 SE-838 80 Frösön Sweden	Phone +46 8 519 41 100 Fax +46 8 735 76 98	www.kemi.se kemi@kemi.se	SE202100388001