

Training system for professional users and sustainable use

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Definition of «professional use»

As indicated in the Emission scenario document for biocides, this term is used in order to :

“emphasise that the general public is not allowed to use a certain substance.

It only indicates that 'professionals' are assumed to have a minimum of knowledge of the substance they are handling by training or education whereas non-professionals (or the general public) are assumed to have little or no knowledge of the substances.

In the different countries the meaning of professional use may be different.

For instance, the interpretation may be that the product is only to be used by pest control operators who have taken a special course on this matter.

In some countries, the staff of the pest control companies are considered professionals and some compounds are allowed to be used only by professional, defined as authorised or licensed people.”

Several categories have been identified among MS:

- **Professional use**
- **Trained Professional use**
- **Amatorial use**
- **Domestic use**
- **Non professional use**

To avoid possible diverging interpretations, when reference is made to 'professionals', the term is meant to cover pest control operators while 'professionals trained to use the product' refers to pest control operators or to other professionals (e.g. licenced having received an appropriate training).

The real problem could be an harmonized definition of “trained” which at the moment fulfill different – or even complete lacking requirements among EU.

In addition, 'amateur use' clearly refers to users who are not professionals and are unlikely to have received any specific training.

Instead of using the confusing definitions of “domestic” or “amatorial”, a unique definition of “non professional” should be taken into account .

The rodenticide case

Rodenticides are one of the few types of pesticides which require approval under both Plant Protection and Biocidal Products regulations, according to their use.

In addition, the Sustainable Use Directive requires Member States to introduce necessary measures to restrict the sale of professional products to those users who hold an appropriate certificate, defining also the necessity of certified training for several identified categories (users, distributors, consultants).

There are initiatives in place to ensure that pesticides for professional use are only sold to qualified users, but currently a product for professional use could be sold also to untrained people.

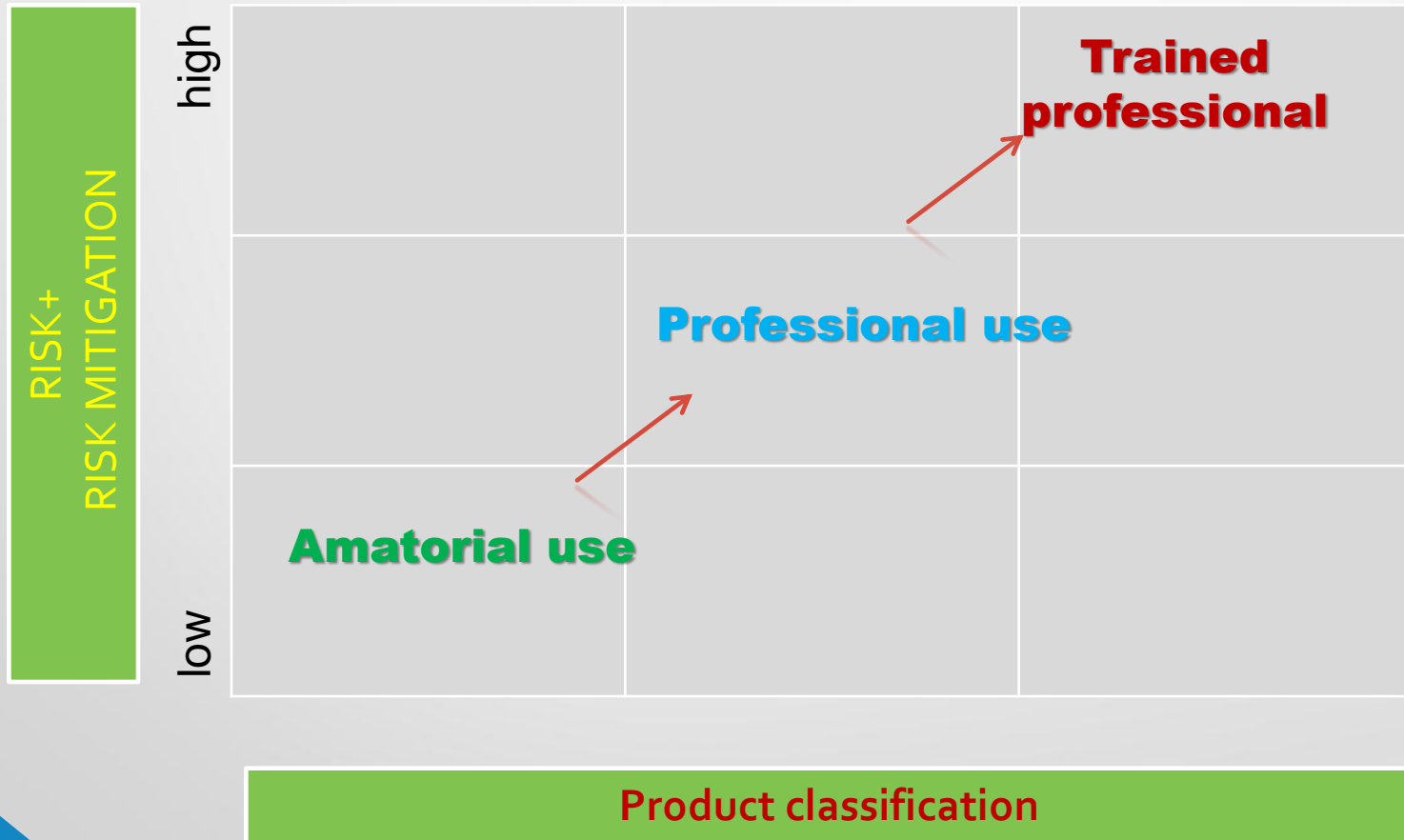
Sustainable use Directive restricts the purchase of products to trained persons, thereby reducing the likelihood of incidents and bad practice, but it also introduces element of accountability by the user and traceability during investigations.

Under this Directive, it will also be necessary that instructions for the safe use by amateurs of agricultural pesticides (i.e. those approved under the Plant Protection Products Regulation such as rodenticides used in horticulture in and around greenhouses) to be available at the point of sale.

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Rodenticides sold for biocidal use define specific RMM for both professional and non professional use with different goals.

Professional/Trained professional/Amatorial



The sustainable use



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**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**

(Text with EEA relevance)

While the BPR does include a number of provisions addressing the use phase, it does not specifically regulate the use phase.

However, to an extent the sustainable use of biocides is already addressed during the active substance approval and product authorisation processes.

The following aspects of the BPR are thus considered to contribute to the sustainable use of biocidal products:

- The approval of an active substance, in particular the exclusion criteria and the substitution principle, which prohibits and substitutes the substances of most concern;
- The authorisation scheme for biocidal products, for the authorisation and the use of products where risks are controlled;
- The simplified authorisation procedure of the BPR;
- The provisions on research and development, providing better supervision of those activities

IPM and best practices

- In addition to the inclusion of IPM principles and best practice documentation as part of a training and certification scheme, a number of options could be used to encourage the dissemination of best practice and to ensure compliance with these.
- The following recommendations are made:
 - 1. Link with product authorisation – the product authorisation could refer to the relevant guidance/best practice documents;
 - 2. Voluntary standards - company or industry voluntary standards should include adherence to guidance/best practice documentation where appropriate;
 - 3. Best available techniques reference documents could refer to guidance/best practice documents on the sustainable use of biocides in that sector.

IPM and best practices

- Where there is a need to develop further guidance/best practice for an activity or for the use of individual product types, the Commission could look to establish specific working groups for the industry sectors concerned, or support industry initiatives on this.
- The creation of working groups and framework could serve as an example for EU-wide collaboration on the development of best practices for sustainable use of biocides.
- In the absence of a formal legal requirement to establish national action plans for the sustainable use of biocidal products, the Commission could seek to support initiatives taken at the Member State level to develop strategies on the sustainable use of biocides which incorporate best practices.

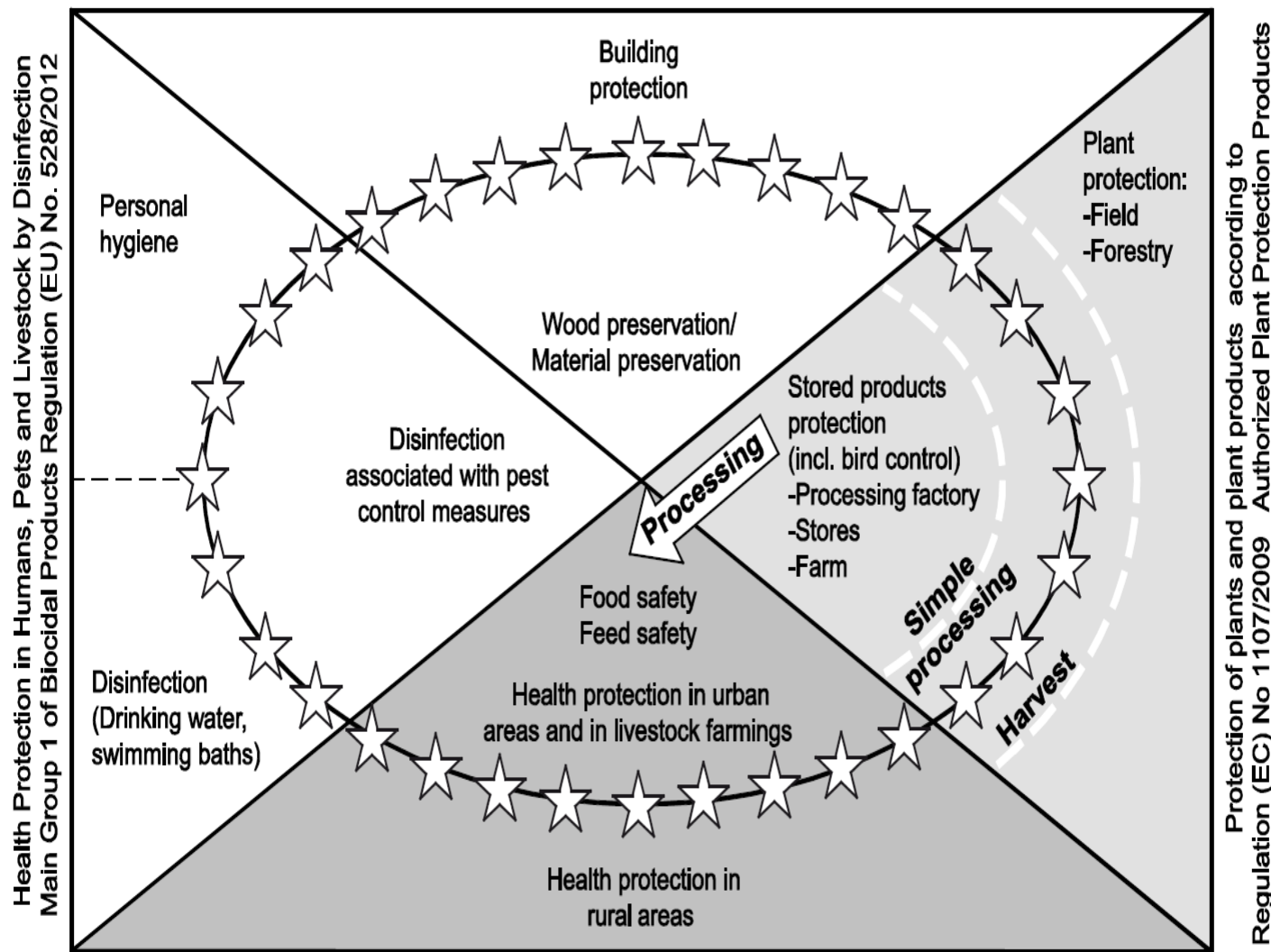
Training and certification

- The key measures to reduce the risks from the use of biocidal products are training and certification.
- Whilst it is not considered appropriate to extend the scope of Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of agricultural pesticides (the Sustainable Use Directive) to biocidal products, due to the number and diverse nature of biocidal products, the provisions of this Directive on training and certification are also relevant for biocidal products.
- It is therefore recommended that the principles of integrated pest management (IPM) should be adapted to specific biocidal product types, as part of the development of best practices for that product type and thereafter incorporated within a training scheme and certification for biocidal products.

Training

- Training is a key measure to ensure the sustainable use of biocidal products. In approximately half of the Member States, a system of certified training is more or less in place, in addition to other forms of training operated internally by companies.
- It is recommended that this could be harmonised at the EU level, by introducing a requirement for all professional users and distributors of biocidal products to have access to appropriate training, to establish certification systems, and designate the areas of activity that should be covered.
- Based on a review of existing certification systems in Member States, this aspect is already well advanced in most of them in the field of disinfection and pest control, and will be aided by the development of the CEN 16636 standard for pest management services.
- A certification scheme should also be considered for wood preservation products and antifouling products. A phased approach to the introduction of training requirements for all professional users should be adopted according to product type as required.

Protection of asset including wood, wood based products and other materials (incl. Building Propert. and Bird Control) Main Group 2 of Biocidal Products Regulation (EU) No. 528/2012 (Product-type 8,10)



Why a CEN Standard

- Ensure that the Pest Management is observed in order to protecting citizens and the environment in which they live against public health risks.

Why a CEN Standard

- By updating activities to be more efficient, in a safer way, and protecting human and the environment.
- By organizing a certification program.
- By proposing a training program.
- By minimizing the use of biocides when possible without impacting the efficiency of the treatment.



WHAT DOES THE STANDARD COVER?

SCOPE

The standard will specify the requirements and basic competences to reach a professional operation level of the services provided by pest management service companies, to meet the needs of private companies, public authorities and consumers

Currently

- The new European Standard (EN 16636) was formally approved in January and the final text was made available to all CEN Members on 4 March 2015.
- The standard will be published at national level by CEN Members in 33 European countries by the end of September 2015 (at the latest).
- It will replace the pest management standards that have previously been adopted at national level in a number of European countries (including France, Germany, Malta and Spain).

Content

The final EN 16636, Oct 2014, has been published by Technical Committee CEN/TC 404 “Project Committee - Services of pest management companies”, the secretariat of which is held by UNI.

Annex A is normative.

Annexes B, C and D, are informative.

The CEN 404 = EN 16636

- The new European Standard 'Pest management services - Requirements and competences' (EN 16636) has been developed by CEN's Project Committee on 'Services of pest management companies' (CEN/TC 404), which was set up in 2010.
- The Confederation of European Pest Management Associations (CEPA) was closely involved in developing the content of the standard, together with experts nominated by CEN members and stakeholders including the Eurogroup for Animals, which represents animal welfare groups from across Europe.
- Standardization of services is necessary in order to support the development of a single market for services, which will contribute to creating economic growth and employment in Europe.
- The EU Directive on Services (2006/123/EC) encourages the development of European Standards to facilitate compatibility between services, ensure the quality of service delivery and the provision of information to service users.
- European Standards for services also contribute to fostering cross-border trade, improving safety and performance, and protecting consumers and the environment.

The CEN 404 = EN 16636

The new European Standard (EN 16636) specifies the requirements and competences that companies need in order to deliver professional pest management services.

Environmental aspects and animal welfare have been taken into account during the development of the standard, which seeks to minimize any negative impacts.

The new standard also sets out the competences required for different roles (administrative, sales, professional user, technical responsible person) that contribute to the delivery of pest management services.

However, it does not apply to field crop protection or to routine cleaning and disinfection carried out by regular contract cleaning services.

The CEN 404 = EN 16636

- CEN members are bound to comply with the CEN/CENELEC Internal Regulations which stipulate the conditions for giving this European Standard the status of a national standard without any alteration.
- This draft European Standard was established in three official versions (English, French, German).
- CEN members are the national standards bodies of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey and United Kingdom.

The standards

- This European Standard specifies the requirements and competences to be met by professional providers of pest management services in order to protect public health and the environment.
- This Standard applies to those who have the responsibility for delivering pest management services including the assessment, recommendation and subsequent execution of the defined control procedures.
- The requirements set out in this Standard are designed to apply to any service provider whose activity falls within this scope as the application of suitable products and methods against pests.

Goals

- to develop a single common essential standard throughout Europe, the objective of which is to prove that service providers following this standard, offer a quality which is recognized as being professional within all Europe;
- to ensure that its operators are competent to sell and deliver the service they are offering by meeting specified and validated minimum standards of knowledge, skill and practical competence;
- to offer the best available advice on how to prevent pest problems and monitoring the results of the treatment;
- to offer effective and efficient service ;
- to provide a quality service recognized in Europe and will deliver safe services which minimize the risk and possible negative impacts on the environment and animal welfare.

Next steps are:

- To ensure that most professionals follow the standard.
- To meet the requirements of the standard.
- To organize a certification process.
- To inform organizations, customers, stakeholders about the CEN standard.
- To design a protocol.
- To design a certification program.
- Meet the requirements of the standard.

Management improvement

Complying to the Standard :

- Define responsibilities, and necessary competences,
- Organize the communication
- Updating of the information.
- Plan a continuous training program.
- Organize the traceability of all actions.



**Thank you for your
attention !**

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