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Object: Note on the French law project « EGALIM » in the context of the European consultancy concerning "Biocide" products

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I would like to draw your attention to the many potential negative impacts of the EGALIM Law and its implementation in France in terms of public health and the regulation of invasive species.

France, like many other European countries, has to deal with the accidental introduction of invasive species and the tiger mosquito, the Asian hornet are recent illustrations and pose real concerns to public health policy and its implementation. Beyond these exotic species, other species also pose public health problems and bed bug, rats, mice, cockroaches are daily concerns. The management of these species is complex in view of their prolificacy and these pose a real health problem for populations because they transmit pathogens to humans. For illustration, we know so far an upsurge of cases of leptospirosis (deadly zoonosis) in France (> 600 human cases per year and a mortality sometimes beyond 10% of cases). It has, for example, also been proven that cockroaches are an important source of allergy in humans, especially children. The scientific literature demonstrating the impact of these species on human health is overflowing.

These species are regulated by professionals (PCO: Pest Control Operators) and by individuals using "Biocide" products.

- The "EGALIM" law tries to regulate the use of plant protection and biocidal products considering these 2 classes of products as similar. Biocide products are used for reasons of first necessity: to avoid the problems of transmitting diseases to populations and to reside in a habitat worthy in terms of safety, which is not the case for plant protection products
- The "EGALIM" law is a real loss of purchasing power for the individual who will have to pay the services of a PCO whereas before he could lead the fight (weak infestation) alone
- The "EGALIM" law does not take into account the insufficiency of the number of PCOs in France to manage all the sites on which individuals will no longer be able to work alone.
- Individuals participate very significantly (an estimated 50 to 60%) in the regulation of harmful invasive species; whether exotic or domestic.

For these reasons, this "EGALIM" law that the French State is trying to implement poses a real risk in terms of public health at a time when these species are in full explosion as a result of regulatory constraints already very strong on "BIOCIDE" products. I believe that the amalgamation between phytosanitary products and biocides (completely different use) is profound and can cause a health degradation of the living environment of many individuals in France which is not acceptable in 2019. It would be important to consider reality from the field before such regulation decision in "biocide" products usage that is first necessity product family.

Dr. Romain LASSEUR

A handwritten signature in blue ink, appearing to read 'R. Lasseur', with a stylized flourish at the end.