North-East Atlantic Commission *Rotenone and the EU Biocidal Products Directive (Submitted to the North-East Atlantic Commission by Norway)*	**NEA(26)10** **Agenda item: 8**

Rotenone and the EU Biocidal Products Directive

The problem:

Rotenone may lose its approval under the EU Biocidal Products Directive in August 2026.

Background:

All biocides in use before 2006 had an application deadline of March 2006. The Norwegian company VESO submitted the application before the deadline. Rotenone could therefore be used as before until the application was processed. England was to prepare the application for the EU Commission. However, Rotenone is a little-used product in Europe, so the application was not prioritized. After Brexit in 2020, the application was transferred to Poland, where it also remained unprocessed until now. New requirements have now been introduced before biocides can be approved. These requirements include Endocrine Disruption (ED) investigations.

If the results of these investigations are not available within the given deadline, rotenone will lose its approval under the EU Biocidal Products Directive. To prevent this from happening, studies must be conducted to investigate Endocrine Disruption. The results of these tests must be delivered by August 2026. These studies are very time-consuming and expensive. It is not possible to conduct such studies within the given time frame, and the costs are estimated to approximately 2,5 million euro. These requirements cannot be met by the company VESO.

Consequences:

The consequences of rotenone not being approved under the Biocidal Products Regulation make it very difficult or impossible to use the product any longer. Further eradication of *Gyrodactylus salaris* is entirely dependent on rotenone continuing to be used. There are no alternative methods for eradication of parasites.

All contingency plans against *G. salaris* developed in Europe are based on the use of rotenone to immediately eliminate the parasite upon detection.

However, there is an exception rule that can hopefully be used, which is called ‘Essential use’. However, it is uncertain what possibilities and limitations exist in this exception.

The Working Group on *Gyrodactylus salaris* in the North-East Atlantic Commission Area (GSWG) had a meeting in Edinburgh in March 2026. The Working Group expressed concern at the potential implications of the EU Biocides Regulation 528/2012 for the use of rotenone in eradication programmes.

Recommendation:

The Working Group recommends that relevant Parties and jurisdictions consult with the European Commission to ensure that the use of rotenone meets the exemptions in the Regulation.

The Norwegian delegation is concerned that this is not sufficient to ensure the use of rotenone in the future. We therefore suggest that North-East Atlantic Commission contact the relevant authorities in the EU directly to ensure the continued use of rotenone.

The purpose of the biocidal product regulations is to protect humans, animals and the environment from harmful chemicals, as well as to ensure the free flow of such products in the EU / EEA market.

It is worth noting that rotenone is not freely available on the market. Rotenone is only used by the authorities to control diseases/parasites and alien fish species that threaten natural biodiversity. Only professionals are permitted to use rotenone.

Rotenone has been in use for about 90 years, mostly in the United States, and there is very good documentation of its effects on biodiversity. We therefore see no reason why the authorities should not be able to use rotenone to preserve natural biodiversity.