



Joint statement in support of use of anticoagulant rodenticides for permanent baiting

The undersigned organisations, representing thousands of food and feed business operators along the agri-food chain, including food and feed primary, secondary producers, wholesalers and retailers, call on the European Commission and the Standing Committee on Biocidal Products to **support the Use Case 11 (permanent baiting) in the approval of anticoagulant rodenticides, in situations of qualified risk of infestation**, as rodents can affect all stages of the food production chain by transmitting numerous pathogens, compromising biosecurity, and causing economic losses through contamination and quality degradation.

Permanent baiting is a critical element of integrated pest management in non-food and especially food environments and is indispensable for safeguarding food security, food – and feed safety, protecting public health, and preventing avoidable food losses. Scientific and practical evidence shows that alternative methods, such as snap traps or other chemical solutions, are often insufficient due to environmental constraints, rodent behaviour, and limited efficacy. **A prohibition would severely compromise the agri-food sector’s ability to maintain hygiene and safety, weaken system resilience, and increase vulnerability to pest-related crises.**

We therefore call for a balanced, evidence-based approach that recognises the essential role of permanent baiting in both routine operations and crisis preparedness.

Background

In May 2025, ECHA's Biocidal Products Committee (BPC) adopted opinions supporting the renewal and approval of several anticoagulant rodenticide active substances (product-type 14) but recommended against their use for permanent baiting (Use Case 11), citing the availability of other chemical and non-chemical alternatives.

Permanent baiting derogation for hygiene and safety sensitive sectors

We request that the use of anticoagulant rodenticides for permanent baiting be permitted in situations where there is a *qualified risk of infestation*. These are situations across the value chain in which an agri- food business operator has no alternative means to effectively prevent the risk of infestation. For instance, in a wholesale food warehouse, it is not feasible to determine with absolute certainty daily whether mice are present.

However, it can be established that there is a credible and ongoing risk of mice being introduced through food transport and deliveries. In such cases, the use of anticoagulant rodenticides for permanent baiting must be allowed to effectively prevent the buildup of an infestation and the resulting increased risk to food safety.

Another example involves food businesses located adjacent to properties where a rodent infestation is already present. In these situations, the use of rodenticides by the food business operator is objectively necessary as part of a robust, multi-faceted rodent management strategy to effectively prevent infestations that could occur at any time.

We strongly urge the Commission and national authorities to ensure the possibility of using anticoagulant rodenticides for permanent baiting not only in situations of detected infestation, but also in situations of qualified risk of infestation.

Key arguments

1. Permanent baiting is essential for prevention

Rodent infestations in the primary production and trade of raw materials, its processing, as well as food and non-food retail & wholesale environments pose serious risks:

- Contamination of raw materials and finished food products
- Damage to packaging and infrastructure
- Compromised hygiene
- Health threats to consumers
- Increased food loss during storage and logistics across the agri-food value chain, and consequent financial losses
- Reduced food systems resilience and crisis preparedness

For hygiene reasons, agri- food business operators are obligated to prevent or minimise food safety risks early and effectively. Thus, biocidal legislation must not prohibit the early and effective use of anticoagulant rodenticides. Waiting for visible signs of infestation to act introduces dangerous delays, during which substantial contamination or damage can occur.

2. Lack of viable alternatives

There is insufficient evidence that other chemical or non-chemical solutions, such as mechanical snap traps, are a suitable alternative to anticoagulant substances and products.¹ Non-chemical alternatives like snap traps are generally less effective, as factors like the environment, animal behaviour, and biology make infestations harder to control with traps alone.

Other chemical alternatives to snap traps also have limitations. For example, alpha-chloralose only works well in cooler temperatures, while cholecalciferol is highly toxic and has no antidote in case of poisoning.

Another method involves using carbon dioxide boxes, but they are only made by one supplier and seem to work only for house mice indoors.

Scientific papers also show that anticoagulants “(...) are essential, especially in situations with a high risk of infestation”.² The German Federal Association of Food Inspectors (BVLK) also warns against a ban on rodenticides.³

Moreover, rodents have good learning abilities and develop avoidance behaviours over time, rendering traps ineffective. It is thus essential, especially in high-risk environments, **that a mix of methods is necessary to prevent resistance and ensure efficacy.**⁴

Our sectors rely on a combination of measures, and the idea of simply replacing one tool with another, as implied by comparative assessments, does not fully capture the complexity of effective pest control in our operations. A multi-faceted approach, tailored to specific situations, including both chemical and non-chemical methods, is indispensable.

3. Food safety and food security cannot be compromised

Removing the option of permanent baiting would severely impair the sector’s ability to meet food safety standards. This would:

- Undermine public health protections
- Create reputational risks for agri- food business operators
- Increase avoidable food losses and environmental waste of packaging
- Potentially lead to economic burdens from increased infestations and recalls
- Potentially decrease Europe’s food security and resilience

In conclusion, permanent baiting enables early intervention before infestations occur.

Waiting for visible signs of infestation to act introduces dangerous delays, during which substantial contamination or damage can occur. The presence of rodents also significantly increases the risk of infection for consumers and employees: rats and mice are disease carriers and can spread dangerous pathogens through faeces, urine and saliva, for example. Furthermore, rodents damage not only products but also engineering systems – electrical wiring,

¹ TRNS e. V. UBA manufacturer order study on the AK indoor ban irrelevant, in: DpS 06/2024 p. 10 ff; Klemann/Endepols, How effective are mechanical traps?, in: DpS 05/2024, p. 14 ff.

² Karg, Can it be removed or must it be. Kommentar zur befallungsunabhängigen Dauerbeköderung, in: DpS 04/2025, p.12. Karg, Auswirkungen einer Beschränkung zulässiger Methoden der Bekämpfung von Mäusen in Lebensmittelproduktions- und Einzelhandelsbetrieben, in: LMuR 2024, p. 23 ff.

³ Food inspectors warn of authorities' plan, <https://lebensmittelpraxis.de/handel-aktuell/37302-kampf-gegen-schadnager-lebensmittelkontrolleure-warnen-vor-behoerden-plan.html>, last accessed on 2 July 2024.

⁴ Hartung, J. (2025): The hygienic significance of rodent infestation (rats and mice) in food retail stores, Berliner und Münchener Tierärztliche Wochenschrift 138, p. 1-7, <https://www.vetline.de/zur-hygienischen-bedeutung-des-befalls-mit-nagern-ratten-und-maeusen-im-lebensmittel-einzelhandel>, last accessed 10/06/2025.

automation, pipelines – which can disrupt the entire technological process. Such incidents pose a direct threat not only to production but also to worker safety.

Signatories:

AIBI - <https://www.aibi.eu/>

Coceral- <https://www.coceral.com/>

Copa- Cogeca - <https://copa-cogeca.eu/>

EuroCommerce - <https://www.eurocommerce.eu/>

Euromaisiers- <https://www.euromaisiers.eu/>

Euromalt - <https://www.euromalt.be/>

European Flour Millers - <https://www.flourmillers.eu/>

FoodDrinkEurope - <https://www.fooddrinkeurope.eu/>

Freshfel - <https://freshfel.org/>

Hotrec - <https://www.hotrec.eu/en/>

Independent Retail Europe - <https://independentretaileurope.eu/en>

Serving Europe - EU transparency Register No: [36538072001-07](#) (website in progress)

Starch Europe - <https://starch.eu/>

Unistock Europe - <https://www.unistock.be/>