

In Support of Use of Anticoagulant Rodenticides as Permanent Baiting

Summary

The European food and non-food retail and wholesale sector calls 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**. Permanent baiting is a critical element of integrated pest management in non-food and especially food environments and is indispensable for safeguarding food safety, protecting public health, and preventing avoidable food losses. A prohibition would **jeopardise the operational ability of the sector to ensure hygiene and safety**. It would also weaken the resilience of food systems, leaving them more vulnerable to pest-related crises in sensitive environments and would not be supported by scientific or practical evidence.

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 in which a 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 on a daily basis whether mice are present. However, it can be established that there is a credible and ongoing risk of mice being introduced through food deliveries. In such cases, the use of anticoagulant rodenticides as permanent baiting must be allowed in order 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 food and non-food retail & wholesale environments pose serious risks:

- Contamination of food products
- Damage to packaging and infrastructure
- Compromised hygiene
- Health threats to consumers
- Increased food waste and financial losses
- Reduced resilience and crisis preparedness

For hygiene reasons, food business operators are obligated to prevent or minimise food safety risks early and effectively. However, biocide law 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 sector relies 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

¹ TRNS e. V. UBA-Herstellauftragsstudie zum AK-Innenraumverbot irrelevant, in: DpS 06/2024 S. 10 ff; Klemann/Endepols, Wie effektiv sind mechanische Fallen?, in: DpS 05/2024, S. 14 ff.

² Karg, Kann das weg oder muss das sein. Kommentar zur befallsunabhängigen Dauerbeköderung, in: DpS 04/2025, S.12. Karg, Auswirkungen einer Beschränkung zulässiger Methoden der Bekämpfung von Mäusen in Lebensmittelproduktions- und Einzelhandelsbetrieben, in: LMuR 2024, S. 23 ff.

³ Lebensmittelkontrolleure warnen vor Behördenplan, <https://lebensmittelpraxis.de/handel-aktuell/37302-kampf-gegen-schadnager-lebensmittelkontrolleure-warnen-vor-behoerden-plan.html>, zuletzt abgerufen am 2.7.2024.

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.

3. Food Safety 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 food operators
- Increase avoidable food losses and environmental waste
- Potentially lead to economic burdens from increased infestations and recalls

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

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