

ANNEX



Joint Statement on the need for permanent baiting in high-risk situations to safeguard food safety in food and feed premises

As the European Commission and Member States **discuss the renewal of anticoagulant rodenticides**, the undersigned organisations representing food and feed operators across the agri-food chain call for the **continued availability of permanent baiting under Use Case 11 where a qualified risk of infestation has been identified**.

Food and feed businesses have a legal obligation to prevent rodent infestations and protect food from contamination throughout their operations. Effective rodent management is therefore an essential component of food and feed safety, public health protection and supply chain resilience.

In our Joint statement in support of use of anticoagulant rodenticides for permanent baiting¹, we underlined that a prohibition of permanent baiting would severely compromise the agri-food sector's ability to maintain hygiene and safety.

As an indispensable part of an effective Integrated Pest Management (IPM) strategy for biocides, the use of anticoagulant rodenticides needs to remain possible where a qualified risk of infestation exists².

Any proposal to restrict this practice must demonstrate that alternative measures can achieve an equivalent level of protection. Based on the evidence currently available, this question remains open and warrants further consideration, particularly in the context of food and feed establishments with elevated rodent risks.

1. Preventing rodent intrusion is a legitimate food-safety objective

Food and Feed safety legislation is based on prevention. Once rodents enter a food or feed establishment, they may contaminate products, packaging, equipment and food-contact surfaces, creating risks for public health and potentially leading to food or feed losses and operational disruption.

A qualified-risk approach allows targeted preventive action where a documented risk assessment demonstrates a significant likelihood of rodent intrusion or infestation. Such an approach does not imply unrestricted use of rodenticides. Rather, it enables professional intervention in clearly justified circumstances before contamination occurs, consistent with the preventive obligations imposed on food and feed operators.

While anticoagulant rodenticides have a delayed mode of action, the relevant consideration is whether their use contributes to reducing the likelihood and duration of rodent activity within food and feed premises. Restricting baiting at identified points of entry may reduce the operators' ability to intervene before rodents are present, potentially creating tension between food or feed hygiene obligations and the tools available to fulfil them. From a food or feed safety perspective, timely and risk-based intervention should be regarded as a key element of prevention.

The German Federal Institute for Risk Assessment (BfR) recently concluded that proposed restrictions on permanent baiting require significant further review and

¹ Available online under: <https://www.lobbyregister.bundestag.de/media/68/35/716677/Stellungnahme-Gutachten-SG2603310062.pdf> and EuroCommerce paper: <https://www.eurocommerce.eu/2025/07/in-support-of-use-of-anticoagulant-rodenticides-as-permanent-baiting/>

² A situation in which, on the basis of a risk analysis carried out by a pest control professional, it is demonstrated that rodent intrusion, infestation or nesting is highly probable to occur within a reasonable timeframe and in a manner likely to result in contamination of food or feed, and in which no alternative measures are available or sufficiently effective to prevent the persistence or further spread of an infestation within a reasonable period and with effectiveness comparable to that of anticoagulant rodenticides.

alignment, emphasizing that key public health impacts and the practical realities of implementation have not yet been adequately considered.³

2. Alternative measures should complement, not replace, effective control tools

The undersigned organisations support the use of alternative measures wherever appropriate. This should be assessed on the basis of the effectiveness demonstrated under the relevant conditions, rather than theoretical availability. The effectiveness of snap traps depends on factors including rodent species, rodent behaviour, rodent population density, the characteristics of the premises and in particular trap placement⁴⁵.

CO₂-based trapping technology is subject to practical limitations and cannot currently be regarded as a universal alternative to rodenticide-based control, particularly for rats. Snap traps likewise cannot automatically be considered an equivalent stand-alone solution. Rodents learn to avoid traps, a phenomenon commonly referred to as “trap shyness” or trap avoidance, which reduces trapping effectiveness.

This is precisely why IPM for biocides relies on complementary control measures rather than assuming that one method will always be sufficient. Where trapping alone cannot reliably prevent rodent intrusion, prohibiting rodenticides removes an effective control option without demonstrating equivalent protection.

3. Resistance should be addressed through stewardship

Concerns about resistance and non-target exposure are legitimate but do not justify a blanket ban on permanent baiting. Instead, rodenticides should be used responsibly through risk-based bait management, including targeted placement, monitoring, documentation and regular review. This minimises unnecessary use while preserving the ability to intervene quickly where necessary. Resistance should therefore be addressed through stewardship and targeted use, rather than by removing permanent baiting altogether.

4. Non-target exposure must be assessed based on actual risk

³ Need for improvement and coordination regarding the ban on continuous baiting independent of infestation in food and feed production facilities, German Federal Institute for Risk Assessment, Opinion No. 032/2026, June 2026.

⁴ The placement of traps for maximum effectiveness plays a particularly crucial role. This requires the pest control technician to possess the necessary skills and experience. There are doubts as to whether the pest control technicians always possess sufficient expertise to meet these requirements.

⁵ Klemann, N., & Endepols, S. (2026). A comparative evaluation of the efficacy of traps and rodenticide baits in field studies with house mice (*Mus musculus*). *Scientific Reports*, 16, 28768. <https://doi.org/10.1038/s41598-026-69150-w>

The risk to non-target species depends on the specific use scenario and should not be assessed uniformly across all environments. Risk must be assessed according to the actual exposure pathways associated with the specific use scenario.

In enclosed food premises such as warehouses, production facilities and supermarkets, where bait is securely placed and inaccessible to non-target species, the potential for primary exposure is substantially reduced. Risks of secondary poisoning are also lower where rodents remain within buildings and are less accessible to predators. It is therefore important to distinguish between different exposure scenarios and apply a proportionate, risk-based approach.

5. Conclusion

Where alternative measures alone cannot reliably achieve the level of protection required under food hygiene legislation, access to rodenticides remains necessary to support compliance and safeguard food safety. Neither unrestricted use of permanent baiting nor their indiscriminate prohibition seems proportionate. The objective should be effective, evidence-based and proportionate rodent management within an IPM framework.

Permanent baiting should therefore remain available where a qualified risk of infestation or rodent intrusion has been identified, subject to appropriate risk mitigation, monitoring and responsible use.

A risk-based approach would minimise unnecessary rodenticide use while preserving an important preventive control measure where it is genuinely required. A blanket prohibition, by contrast, removes this option regardless of the specific risk profile of individual food premises and without demonstrating that alternative measures provide an equivalent level of protection.

The Court of Justice of the European Union (CJEU) has recently reaffirmed that the responsibility for ensuring the highest level of consumer protection lies with the food business operator.⁶ To meet this responsibility and the resulting high standards, food and feed business operators therefore need effective and reliable tools.

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

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

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

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

⁶ C-483/24, Judgement of 13 May 2026.

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

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

FoodDrinkEurope - <https://www.fooddrink europe.eu/>

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

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

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

Serving Europe - <https://serving europe.com/>

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

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