

Mr Klaus Berend
Acting Director
DG SANTE
EU Commission
By email

Use of anticoagulant rodenticides biocidal products

Dear Mr. Berend,

The undersigning organisations would like to provide you with their common insights into the item A.07 “Exchange of views on the second comparative assessment of anticoagulants rodenticides biocidal products”, which is on the agenda of the 28 June 2023 Standing Committee on Biocidal products.

We understand that this assessment might put into question the market access/use of such rodenticides versus mechanical options through delegated acts.

We would like to point out the following aspects:

- Rodent management is an important aspect of hygiene management for all undersigning organisations, which are active at several levels of the food chain.
- In order to cope with these hygiene requirements, we need to have access to a range of solutions for a proper/efficient management, in an integrated way. The control of rodents requires using elaborated methodologies that vary according to places and time. A lack of solution/efficiency would create important hygiene issues in the food chain: rodents are indeed vectors of various zoonoses (leptospirosis, etc.) and frequently carry zoonotic bacteria such as *Salmonella*.
- The EU-BPC report (second comparative assessment), seems to hold the view that mechanical trapping offers a suitable alternative to the use of anticoagulants or anti-vitamin K (AVK) rodenticides.
- It appears that this statement in the report is based on only one study, which is furthermore not available. We do not believe that this can be seen as a sufficient basis for such an important decision and recognize that the complexity of the issue requires a much more thorough analysis and scientific basis.

We call on European Commissions and the Standing Committee not to revise the authorization/use of AVK rodenticides on this basis.

In our capacity as final users of rodent-control methodologies, our sectors are available to the EC for further reflection and/or work on this topic if desirable.

Yours sincerely,



CC: Eric Thévenard, Head of Unit – DG SANTE

Member States delegations in Standing Ctee on Biocidal products