



Bundesanstalt für Arbeitsschutz  
und Arbeitsmedizin

Federal Institute for Occupational  
Safety and Health

**Minority opinion of the German CA regarding the “BPC Opinion on questions related to the comparative assessment of anticoagulant rodenticides” discussed at BPC-45**

The German Competent Authority does not agree with the BPC conclusion that no sufficient information is available to conclude on the suitability of efficacious alternatives to permanent baiting (use #11).

Rationale:

1. A direct proof of efficacy is neither available for the preventive use of anticoagulant rodenticides (AR) as permanent baits nor for traps. Nevertheless, a case study has been submitted to ECHA, showing that mice traps perform significantly better to monitor, detect and control rodents in a preventive setting when directly compared to AR.
2. Traps were found by the BPC to have no economical nor practical disadvantages, a significantly better risk profile with regard to human health, animal health and the environment and to be more humane in terms of avoiding unnecessary suffering and pain for vertebrates. In addition to traps, there are various alternatives already being used by professionals for permanent monitoring of rodent activity as part of the integrated pest management (IPM) concept, e.g. using non-toxic baits in remotely operated bait stations or sensor/camera equipped Internet of Things (IoT)-devices.
3. Numerous scientific studies exist that document the detrimental effects of AR to wildlife in terms of primary and secondary poisoning and the widespread exposure of non-target animals. The likelihood of such incidents is increased when rodenticide bait is applied permanently.

The German competent authority therefore concludes that effective alternatives to the preventive and permanent application of PBT-classified second-generation AR are available and thus cannot agree with the “BPC Opinion on questions related to the comparative assessment of anticoagulant rodenticides”.