



Mandate requesting an ECHA opinion under Article 75(1)(g) of the BPR on Questions relating to a guidance on rodent traps developed by the German Environment Agency

1. Background

- (1) Anticoagulant active substances used in rodenticides (AVK) are persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB), and have been detected in numerous terrestrial and aquatic non-target animals worldwide¹. In addition, they are classified as toxic for reproduction category 1A or 1B and show specific target organ toxicity. The use of anticoagulant rodenticides can also raise questions in terms of unnecessary suffering of target animals, and development of resistance to the active substance(s) in target rodents has been already observed in different EU Member States and worldwide².
- (2) As they thus meet the exclusion criteria set out in Article 5(1) of Regulation (EU) No 528/2012 concerning the making available of Biocidal Products (the BPR), these active substances should normally not be approved and therefore, products containing these substances normally not authorised. However, effective rodent control still relies largely on the use of these active substances, and more than three thousand products containing AVK have been authorised. The second renewal of products containing AVK should start in June 2021 and the Member States are keen to see a number of questions related to comparative assessment addressed at Union level (The EU comparative assessment) covering chemical rodenticides and non-chemical alternatives (such as mechanical traps), before completing their evaluations of the applications for renewal of product authorisations.
- (3) Some companies have invested in the development of advanced trap systems, which may limit the use and reduce the potential negative impacts of products containing AVK. Professional pest managers are progressively incorporating such equipment in their toolbox for controlling rodents. However, so far, public authorities have been reluctant to consider these non-chemical alternatives in their comparative assessment because there was no agreed method to assess their efficacy and there seems to be a lack consensus on whether they would be efficacious in real field conditions compared to products containing AVK.
- (4) In order to address this issue, the German Environment Agency organised in November 2018 a first workshop to prepare the ground for the development of criteria for the assessment of the efficacy and humaneness of rodent traps. The

¹ Badry et al. 2020; Geduhn et al. 2014; Geduhn et al. 2015; Geduhn et al. 2016; Laakso et al. 2010; Regnery et al. 2019, Kotthoff et al. 2018

² Berny et al. 2018; Mason & Littin 2003; McGee et al. 2020; Pelz et al. 2005

German Environment Agency organised since then three further workshops to collect information from experts from national authorities, producers and users of anticoagulant rodenticides and traps. This work led to the publication of a guidance of the German Environment Agency on the assessment of the efficacy and humaneness of rodent traps (NoCheRo-Guidance)³.

- (5) At the 90th meeting of representatives of Member States Competent Authorities for the implementation of Regulation (EU) No 528/2012 in December 2020, it was agreed that the Commission would request an opinion from ECHA on whether the principles for determining efficacy as included in the efficacy guidance currently established by ECHA for chemicals⁴, are also applicable to rodent traps. This opinion would facilitate the consideration of rodent traps in the forthcoming EU comparative assessment for products.

2. The questions to be addressed by the ECHA opinion

- (6) The guidance published by the German Environment Agency is provided together with this mandate. The sections of particular interest in the context of this request are highlighted in yellow.
- (7) ECHA should evaluate whether the principles for determining the efficacy of products containing AVK as included in the efficacy guidance currently established by ECHA for chemicals is properly reflected in the NoCheRo-Guidance
- (8) More specifically, ECHA is requested to answer the following question:
Can ECHA conclude that the NoCheRo-Guidance applies the same principles as the ECHA efficacy guidance used for chemical rodenticides?

3. Elements to be considered by ECHA when addressing those questions

- (9) The ECHA efficacy guidance and the NoCheRo-Guidance on rodent traps should form the basis for the opinion of ECHA.
- (10) Any additional information (including discussion with stakeholders, the articles included in the list in Annex I to this mandate, etc.) that ECHA might find relevant to provide its opinion.

4. Deadline for the ECHA opinion

- (11) ECHA has been requested to provide an opinion on questions related to the comparative assessment of anticoagulant rodenticide products in a separate mandate by 31 December 2022.
- (12) This mandate contains questions relating to the efficacy of rodent traps that could facilitate the comparison of non-chemical alternatives to products containing AVK, and therefore contribute to ECHA's opinion referred to in the preceding point.

³ <https://www.umweltbundesamt.de/publikationen/nochero-guidance-for-the-evaluation-of-rodent-traps>

⁴ https://echa.europa.eu/documents/10162/23036412/bpr_guidance_assessment_evaluation_part_vol_ii_part_bc_en.pdf/950efefa-f2bf-0b4a-a3fd-41c86daae468

- (13) Therefore, the ECHA opinion on the present mandate shall be submitted to the Commission by 31 December 2021.

Annex I

Literature:

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Kotthoff, M.; Rüdell, H.; Jüriling, H.; Severin, K.; Hennecke, S.; Friesen, A.; Koschorreck, J. (2019): First evidence of anticoagulant rodenticides in fish and suspended particulate matter: spatial and temporal distribution in German freshwater aquatic systems. In: *Environmental Science and Pollution Research*, 26(8), S. 7315-7325. <https://doi.org/10.1007/s11356-018-1385-8>

Laakso, S., Suomalainen, K., & Koivisto, S. (2010). Literature review on residues of anticoagulant rodenticides in non-target animals. *TemaNord* 2010:541. Nordic Council of Ministers, Copenhagen, Denmark, pp. 1-58.

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Pelz, H. J., Rost, S., Hünerberg, M., Fregin, A., Heiberg, A. C., Baert, K., ... & Müller, C. R. (2005). The genetic basis of resistance to anticoagulants in rodents. *Genetics*, 170(4), 1839-1847.

Regnery, J., Parrhysius, P., Schulz, R. S., Möhlenkamp, C., Buchmeier, G., Reifferscheid, G., & Brinke, M. (2019). Wastewater-borne exposure of limnic fish to anticoagulant rodenticides. *Water Research*, 167, 115090.