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# 2nd EU Workshop on Non-Chemical Alternatives for Rodent Control (NoCheRo)

Report on the 2nd NoCheRo Workshop  
(Brussels, 05th February 2020)



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## **2nd EU Workshop on Non-Chemical Alternatives for Rodent Control (NoCheRo)**

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(Brussels, 05<sup>th</sup> February 2020)

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**Abstract: 2<sup>nd</sup> EU Workshop on non-chemical alternatives for rodent control**

The 2<sup>nd</sup> workshop on non-chemical alternatives for rodent control (NoCheRo) was organised by DG Santé, European Commission, and the German Environment Agency. At the 1<sup>st</sup> workshop in Brussels in November 2018, rodent traps were identified as already being an integral part of professional and modern pest control. However, the lack of criteria and test methods for the efficacy and animal welfare assessment was found to be a hindering factor to consider traps as viable non-chemical alternatives to (anticoagulant) rodenticides and an obstacle for their better establishment as a pest control method on the market. As a result of the 1<sup>st</sup> workshop, a working party was established with experts from authorities, pest control industry and scientific organisations to write a technical guidance on trap testing and evaluation. For this, the working party considered test procedures based on several international test standards on animal welfare of break back/ snap killing traps. Furthermore, criteria and methods for the evaluation of effectiveness were included that are not covered by the existing international test protocols. Wherever possible, the draft guidance was based on the Guidance on the Biocidal Products Regulation Volume II Efficacy - Assessment and Evaluation, part PT 14 rodenticides (2018). A first draft for a guidance for trap testing was presented to representatives from the competent authorities on biocides, the European Commission, the scientific community, NGOs and industry during the 2<sup>nd</sup> workshop in order to identify shortcomings. Overall, the feedback on the first draft was positive. The discussions revealed some aspects which need further elaboration or a more detailed description, such as the shelf-life or use-life of traps, effects on non-target organisms, the influence of lure type in the assessment of efficacy and a good practice code for trap use. The working party will elaborate further on these aspects in order to improve the draft.

**Kurzbeschreibung: 2. EU Workshop zu nicht-chemischen Alternativen der Nagetierbekämpfung**

Der zweite Workshop zu nicht-chemischen Alternativen in der Nagetierbekämpfung (NoCheRo) wurde von der Generaldirektion Gesundheit und Lebensmittelsicherheit der Europäischen Kommission und dem Umweltbundesamt organisiert. Beim ersten Workshop im November 2018 in Brüssel wurden Nagetierfallen als bereits integraler Bestandteil der professionellen und modernen Schädlingsbekämpfung identifiziert. Es wurde jedoch festgestellt, dass fehlende Kriterien und Testmethoden zur Bewertung der Wirksamkeit und tierschutzgerechten Wirkweise von Fallen ein Hindernis für ihre Bewertung als geeignete Alternativen zu (antikoagulanten) Rodentiziden darstellt und die Etablierung als Schädlingsbekämpfungsmethode auf dem Markt erschwert. Das Ergebnis des ersten Workshops war die Gründung einer Arbeitsgruppe mit Experten von Behörden, Schädlingsbekämpfungsindustrie und wissenschaftlichen Einrichtungen, die einen Leitfaden zur Prüfung von Nagetierfallen erstellen sollten. Für die Definition von Bewertungskriterien wurden mehrere internationale Teststandards zur tierschutzgerechten Wirkweise bei Tötungsfallen einbezogen. Darüber hinaus wurden Kriterien und Methoden für die Wirksamkeitsbewertung aufgenommen, die nicht in den bestehenden internationalen Testprotokolle berücksichtigt sind. Wo es möglich war, wurde der Leitfadenentwurf an den Leitfaden für die Wirksamkeitsbewertung von Rodentiziden (BPR Volume II Efficacy - Assessment and Evaluation, part PT 14 rodenticides, 2018) angelehnt. Ein erster Entwurf des Leitfadens für die Prüfung von Schlagfallen wurde im Rahmen des zweiten Workshops den Vertretern der EU-Behörden für Biozide, der Europäischen Kommission, Wissenschaftlern, NGOs und der Industrie vorgestellt um Mängel des Entwurfs zu identifizieren. Das Feedback zum Entwurf des Leitfadens war generell positiv. Die Diskussion stellte einige Aspekte heraus, die noch einer detaillierteren Ausarbeitung bedürfen, wie etwa die Haltbarkeit und Lebensdauer von Fallen, Auswirkungen auf Nicht-Zieltiere, der Einfluss des Köders in der Wirksamkeitsbewertung und die gute

fachliche Anwendung in der Fallenanwendung. Die Expertenarbeitsgruppe wird diese Aspekte ausarbeiten und verbessern.

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## List of abbreviations

<b>AIHTS</b>	Agreement on International Humane Trapping Standards
<b>AR</b>	Anticoagulant Rodenticides
<b>BMU</b>	German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety
<b>BPR</b>	Biocidal Products Regulation
<b>CEPA</b>	Confederation on European Pest Management Association
<b>DG SANTÉ</b>	Directorate General for Health and Food Safety of the European Commission
<b>ECHA</b>	European Chemicals Agency
<b>EN</b>	European Standard
<b>EU</b>	European Union
<b>ISO</b>	International Organization for Standardization
<b>NGO</b>	Non-Governmental Organization
<b>NoCheRo</b>	Non-Chemical Alternatives for Rodent Control
<b>PBT</b>	Persistent, Bioaccumulating, Toxic
<b>UBA</b>	German Environment Agency



## Summary

In the European Union, chemicals used to control rodents (rodenticides) in order to protect human or animal health or manmade products are subject to the authorisation under the Biocidal Products Regulation (EU) 528/2012 (BPR). Most of the active substances contained in rodenticides are second-generation anticoagulants which meet the exclusion criteria of the BPR, and shall therefore generally not be approved for use in biocidal products. Most anticoagulant rodenticides are toxic for reproduction as well as persistent, bioaccumulative and toxic (PBT). Residues of anticoagulant rodenticides as a result of primary or secondary poisoning and accumulation in the food chain have been detected in a vast variety of terrestrial and aquatic non-target species worldwide. Furthermore, anticoagulant rodenticides cause severe suffering and pain for several days questioning their humaneness. Moreover, resistance against some of these active substances in house mice (*Mus musculus*) and Norway rats (*Rattus norvegicus*) has been observed in different EU Member States.

However, approval of anticoagulants for the use in rodenticides was renewed in 2017 because still no equivalent effective tools to control rodents could be identified. During this process, it appeared that there is a lack of information about the efficacy and humaneness of rodent traps. The German Environment Agency (UBA) and the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) aimed at closing this gap by initiating an EU workshop on non-chemical alternatives for rodent control (NoCheRo) in Brussels in November 2018.

One finding of the workshop was that rodent traps already are an integral part of professional and modern pest control management. However, an objective assessment of their efficacy and humaneness is missing for establishing traps as a valid control measure of pest control operators.

Subsequently, a working party was founded joining experts from competent authorities, industry and science. They drafted a testing guidance with criteria defining the efficacy and humaneness of rodent traps. This first draft was presented to representatives from the competent authorities on biocides, the European Commission, the scientific community, NGOs and industry during the 2<sup>nd</sup> workshop.

The basic structure of the draft guidance is based on the current guidance for the efficacy assessment for rodenticides (ECHA 2018) in order to facilitate a future comparison of traps with rodenticides. Several international testing standards and ISO standards on humaneness of killing traps (e.g. for fur bearing animals) were also considered in the development of the guidance.

The draft guidance covers a three-step process including tests of the mechanical forces, the animal welfare impact, and the efficacy of traps. It can be expected that not all traps currently on the market will meet the requirements. However, during the workshop the trapping industry clearly took position in favour of a certification system that may support efficient and humane rodent traps to dominate the market and which still needs to be developed.

Several CA-representatives indicated that effective rodent control is needed for public health reasons and, therefore, the chemical toolbox for rodent management of professionals should not be limited. Mechanical traps are regarded as a complementary tool to anticoagulant rodenticides. Some representatives of the trapping industry informed that the use of anticoagulant rodenticides has already substantially decreased during the last years. In contrast, they stated, the demand for non-chemical traps has sharply increased, mostly in the sectors with high hygiene standards, such as the food industry.

Although there was an overall positive feedback to the tiered testing approach and the general goal of the guidance, the meeting concluded that the guidance should be further improved on three main aspects. As a major point for revision the inclusion of an assessment of adverse effects of rodent traps on non-target organisms was pointed out. Furthermore, the role of the lure in the efficacy assessment of traps should be clarified. The use-life of traps should be investigated in more detail. Finally, the Best Practice Code for Trapping within the draft guidance should be complemented regarding the treatment of trapped living animals, the disposal of dead animals and the cleaning and storage of traps.

The working party will revise the draft to address the comments brought forward by the meeting members and will share it with the participants of the workshop for a follow-up commenting period. It is then foreseen to make the draft guidance, which deals exclusively with the testing of break back/snap traps, available to the general public. In the long term, it is the goal of the working party to establish further parts of the testing guidance for different other available types of traps (e.g., electrocution traps).

As another follow-up to the workshop, DG Santé and ECHA will reflect on the appropriateness to consult the Efficacy Working Group of the Biocidal Products Committee of ECHA on a revised version of the draft guidance. Furthermore, DG Santé will reflect on the most appropriate way forward to use this guidance in comparative assessments of rodenticides with non-chemical alternatives under Article 23(3) of the BPR. In addition, UBA will work on the possibilities to have the draft guidance established as an EN standard to be used by the trapping industry to demonstrate product compliance with the agreed criteria on a voluntary basis.

## Zusammenfassung

Chemikalien, die zur Bekämpfung von Nagetieren (Rodentizide) im Rahmen des Gesundheits- oder Materialschutzes eingesetzt werden, müssen gemäß der Biozid-Verordnung (EU) 528/2012 (BiozidVO) zuvor geprüft und zugelassen werden. Die meisten der in Rodentiziden enthaltenen Biozid-Wirkstoffe sind Antikoagulanzen der 2. Generation. Die meisten rodentiziden Wirkstoffe sind reproduktionstoxisch, persistent, bioakkumulativ und toxisch (PBT) und erfüllen damit die Ausschlusskriterien der BiozidVO, wonach solche Wirkstoffe generell nicht zur Verwendung in Biozid-Produkten genehmigt werden. In Folge von Primär- und Sekundärvergiftungen und der Anreicherung über die terrestrische und aquatische Nahrungskette wurden Rückstände von Antikoagulanzen in einer Vielzahl von Studien in verschiedenen Nicht-Zieltieren festgestellt. Darüber hinaus verursachen antikoagulante Rodentizide über mehrere Tage schwere Leiden und Schmerzen bei den Zieltieren, was einer tierschutzgerechten Wirkweise widerspricht. Darüber hinaus wurden in verschiedenen EU-Mitgliedstaaten bereits Resistenzen gegen einige dieser Wirkstoffe bei Hausmäusen (*Mus musculus*) und Wanderratten (*Rattus norvegicus*) beobachtet.

Die Genehmigung von Antikoagulanzen als Biozidwirkstoffe zur Verwendung in Rodentiziden wurde 2017 dennoch erneuert, da erneut keine alternativen, äquivalent wirksamen Maßnahmen zur Bekämpfung von Nagetieren identifiziert werden konnten. Während dieses Prozesses wurde deutlich, dass Informationen über die Wirksamkeit und tierschutzgerechten Wirkweise von Nagetierfallen fehlen. Um diese Lücke zu schließen, veranstaltete das Umweltbundesamt (UBA) und das Bundesministerium für Umwelt, Naturschutz und Reaktorsicherheit (BMU) im November 2018 in Brüssel einen EU-Workshop zu nicht-chemischen Alternativen der Nagetierbekämpfung (NoCheRo Workshop).

Während des ersten Workshops wurde deutlich, dass Nagetierfallen bereits ein integraler Bestandteil der professionellen und modernen Schädlingsbekämpfung sind. Es fehlt jedoch eine objektive Bewertung ihrer Wirksamkeit und tierschutzgerechte Wirkweise, damit Fallen als eine geeignete Bekämpfungsmethode angesehen werden können.

Darauf aufbauend wurde eine Arbeitsgruppe gegründet, der sich Experten aus den zuständigen Behörden, der Industrie und der Wissenschaft anschlossen. Sie entwickelten einen Leitfaden mit Kriterien zur Testung der Wirksamkeit und der tierschutzgerechten Wirkweise von Nagetierfallen. Der erste Entwurf des Leitfadens wurde im Rahmen des zweiten Workshops Vertretern der EU-Behörden für Biozide, der Europäischen Kommission, der Wissenschaft, NGOs und der Industrie vorgestellt.

Der grundlegende Aufbau des Leitfadenentwurfs basiert auf dem aktuellen Technischen Leitfaden zur Bewertung der Wirksamkeit von Rodentiziden (ECHA 2016). Dadurch soll bei einem zukünftigen Vergleich von Fallen mit Rodentiziden eine Vergleichbarkeit der Testkriterien gewährleistet werden. Mehrere europäische und internationale Prüfnormen für die tierschutzgerechten Wirkweise von Tötungsfallen wurden ebenfalls berücksichtigt.

Der vorgestellte Leitfadenentwurf sieht ein dreistufiges Verfahren zur Testung der physikalischen Kräfte, der tierschutzgerechten Wirkweise und der Wirksamkeit der Falle vor. Es ist zu erwarten, dass nicht alle bis dato auf dem Markt erhältlichen Fallen den definierten Testkriterien des Leitfadens entsprechen werden. Während des zweiten Workshops machte die Fallenindustrie deutlich, dass sie ein Zertifizierungssystem unterstützt, das effektiven und tierschutzgerechten Nagetierfallen einen Vorteil auf dem Markt bietet, welches aber noch entwickelt werden muss.

Mehrere Behördenvertreter aus verschiedenen EU-Mitgliedstaaten wiesen darauf hin, dass eine wirksame Kontrolle der Nagetiere zum Schutz der Gesundheit vor möglichen Infektionen und somit ein breites Methodenspektrum erforderlich ist. Mechanische Fallen wurden dabei als ergänzendes Werkzeug zu antikoagulantem Rodentiziden betrachtet. Einige Vertreter der Fallenindustrie teilten mit, dass die Verwendung von Rodentiziden in den letzten Jahren bereits erheblich zurückgegangen ist. Im Gegensatz dazu ist die Nachfrage nach Fallen stark gestiegen, vor allem in Bereichen mit hohen Hygienestandards, wie zum Beispiel der Lebensmittelindustrie.

Die Teilnehmenden des zweiten Workshops gaben grundsätzlich positives Feedback zu dem Leitfadentwurf, kamen aber zu dem Schluss, dass der Leitfaden in drei Punkten weiter verbessert werden sollte. So wurde insbesondere die fehlende Bewertung möglicher nachteiliger Auswirkungen von Fallen auf Nicht-Zieltieren angemerkt. Darüber hinaus sollte die Rolle des Köders bei der Gesamtbewertung der Wirksamkeit geklärt werden. Haltbarkeit und Lebensdauer von Fallen sollte näher betrachtet werden. Schließlich sollte auch das Kapitel der guten fachliche Anwendung von Nagetierfallen in Bezug auf den Umgang mit gefangenen aber noch lebendigen Tieren, die Entsorgung der toten Tiere sowie die Reinigung und Lagerung von Fallen ergänzt werden.

Die Mitglieder der Arbeitsgruppe werden den Entwurf entsprechend überarbeiten. Anschließend sollen die TeilnehmerInnen des Workshops die Möglichkeit erhalten, den überarbeiteten Leitfaden zu kommentieren. Danach soll der Leitfadentwurf der breiten Öffentlichkeit zugänglich gemacht werden. Langfristiges Ziel der Arbeitsgruppe ist es, den Leitfaden um Tests für weitere Fallentypen (z.B. Stromfallen) zu ergänzen.

Im Anschluss an den zweiten Workshop werden die Generaldirektion Gesundheit und Lebensmittelsicherheit der Europäischen Kommission (DG Santé) und die ECHA prüfen, ob der Biozid-Ausschuss der ECHA und namentlich die Arbeitsgruppe zur Bewertung der Wirksamkeit von Biozidprodukten, zu einer überarbeiteten Fassung des Leitfadentwurfs konsultiert wird. DG Santé wird zudem prüfen, wie der Leitfaden bei der vergleichenden Bewertung von Rodentiziden mit Fallen gemäß Artikel 23(3) BiozidVO einbezogen werden kann. Nach erfolgter Abstimmung und Überarbeitung wird das UBA die Möglichkeit prüfen, den Leitfaden als Europäische Norm festzulegen. Die Fallenindustrie könnte dann auf freiwilliger Basis, die Wirksamkeit und tierschutzgerechte Wirkweise ihrer Fallen nachweisen.

## 1 Scope of the 2<sup>nd</sup> NoCheRo Workshop

During the first workshop on *Non-Chemical Alternatives for Rodent Control* (NoCheRo) in 2018, the lack of criteria for the efficacy and animal welfare assessment of rodent traps was found to be a hindering factor to consider traps as viable non-chemical alternatives to (anticoagulant) rodenticides within the comparative assessment under the Biocidal Products Regulation (EU) 528/2012.

To fill this gap, subsequently to the 1<sup>st</sup> workshop, a working party was set up, consisting of 21 experts from seven countries working in the rodent trap industry, in the pest control sector, in science or for competent authorities. Its task was to draft a testing guideline for the evaluation of traps on the basis of objective criteria. After three face-to-face meetings in 2019, intense discussions and numerous rounds of commenting and revising written contributions, a first draft guidance was compiled by the working party for the efficacy and animal welfare assessment of break back/snap traps.

In preparation of the 2<sup>nd</sup> NoCheRo Workshop, the draft guidance was distributed to all participants in mid-January 2020. The aim of the second workshop was to present the first draft of the guidance to a wider audience, to discuss the overall testing approach and to identify shortcomings.

The 2<sup>nd</sup> NoCheRo workshop took place on 5<sup>th</sup> February 2020 in Brussels. It was logistically organized by the European Commission (DG Santé) and chaired by the German Environment Agency, who together with the NoCheRo working party developed the agenda and invited speakers. The workshop was attended by about 50 representatives from the EU Member States authorities on biocides, the European Commission, the European Chemicals Agency, the scientific community, NGOs and the industry.

## 2 Proceeding of the 2<sup>nd</sup> NoCheRo Workshop

The one-day workshop was divided in two parts. The **first part** recapped the outcomes of the 1<sup>st</sup> workshop, the proceedings of the working party and provided different views and perspectives on rodent traps to the audience.

Representatives of the Confederation on European Pest Management Association (CEPA) and the pest control industry illustrated the increasing demand for traps among pest control professionals and their customers in recent years. Especially, the food industry sector increasingly relies on non-chemical (toxin-free) control methods such as digitally equipped traps. At the same time, it was shown by numbers of leading pest control businesses that the use of anticoagulant rodenticides has substantially decreased during the last years. The trapping industry expressed their support for the idea to establish a certification system, knowing that existing rodent traps on the market will likely fail to fulfil the high testing standards.

It was pointed out that in most EU-Member States there is no regulation of traps. Therefore, there are traps on the market that kill inhumanely. An exemption is the regulation of traps in Sweden, where traps for mammals including rats, mice and voles are authorized. In Sweden, trapping devices must be selective, safe for humans and human property and do not expose wild animals to unnecessary suffering. However, in most EU-countries, it is a post-ad hoc decision if the application of traps is in accordance with national animal welfare regulations. That means any traps (e.g. glue trap) can be sold and there is no certification or regulation on the use of traps, but after a trap application, the user can be made responsible for violating the animal welfare regulations by the veterinarian in charge

Humaneness of rodent control methods was especially emphasised during the first part of the 2<sup>nd</sup> workshop. It was pointed out by UBA members in their presentation, that the common perception of the humaneness of killing traps among the general public is probably worse than that of rodenticides, although objective assessment using criteria such as time to irreversible unconsciousness (TIU) would clearly show the opposite in the vast majority of cases. “We are talking about seconds or minutes, when it comes to the discussion of what TIU is considered acceptable in terms of humaneness for traps, while we concurrently accept slow-acting rodenticides which cause suffering and pain in target rodents for several days” the speakers claimed. This twisted perception of humaneness was believed to be reasoned by a more directly and more consciously experienced killing of animals (rodents) when using break back traps, in contrast to the use of poison where rodents usually succumb out of sight in their burrows several days after the application. It was furthermore highlighted that the animal welfare assessment of rodenticides within their EU approval as biocidal active substances is rudimentary albeit no unacceptable effects on target organisms is a condition for granting an authorisation according to article 19 BPR and common principles for the animal welfare assessment of rodenticides are given in Annex VI to the BPR.

In the **second part** of the 2<sup>nd</sup> workshop, the criteria and test methods of the draft guidance were presented by the NoCheRo working party members and discussed with the audience. Structurally, the draft guidance is based on the current ECHA (2018) Guidance on the Biocidal Products Regulation for the efficacy evaluation of rodenticides. Especially, the requirements for the applicant and the criteria of efficacy are kept similar to enable a direct comparison of traps with rodenticides. Accordingly, a trap (as well as the rodenticide) is considered as efficient if 90% of at least two target species populations are eradicated after the rodent control measure. For professional use, the trap must be tested in field trials. For the use by non-professionals, the applicant can choose to conduct two semi-field or two field trials. The differentiation in two categories of users is not implemented in the assessment of rodenticides but can facilitate the



assessment of traps. The testing of break back/snap traps additionally constitutes of testing the mechanical properties and the welfare impact.

The first step of the consecutive testing procedure is to measure the mechanical forces of the trap. This includes the determination of the clamping force, the impact momentum and the triggering force before and after a vibration test proving quality/reliability

Impact moment and clamping force are two forces that determine how fast the death of an animal occurs (Parrott et al., 2009). The impact momentum is the force that exerts on the animal when it is hit by the strike bar; the clamping force exert on the animal by the trap after the strike (Talling and Inglis, 2009). Available methods and devices were presented that could measure the kinetic energy of the trap. If a sufficient number of traps has been tested, the measured forces could be related to the results of the animal welfare tests; more precisely, the time until the strike of the trap provokes irreversible unconsciousness in the target species. If a minimum impact momentum and clamping forces can be determined, the mechanical testing can be sufficient to exclude traps that cannot kill quickly and reliably. This procedure will prevent unnecessary animal testing to assess traps that are physically unable to fulfil the efficacy and animal welfare criteria set out in the draft guidance.

The triggering force is the force that the target animal must exert to the trigger to activate the trap. It should be optimized in a way, that the target species activates the trap in the desired way. Otherwise the trap would strike before or after the target is well positioned and would cause failed catches. Ideally, traps should by means of their construction and/or design only be activated or accessed by target species to avoid unintentionally by-catches of non-target animals. All three forces must be tested after a vibration test that simulates multiples uses and proves the reliability of the trap.

For the testing of the welfare impact, several international testing standards and ISO standards on humaneness of traps were considered by the working party. Generally, a trap is classified as humane if it provokes irreversible unconsciousness of the target species in a defined time span. This time span was chosen lower than in e.g., the Agreement on International Humane Trapping Standards (AIHTS), regulating traps for fur-bearing animals. Pest rodents such as house mice or Norway rats are smaller and have a higher breathing and heart rate. Consequently, unconsciousness should occur faster. Therefore, the working party agreed on different time spans for small rodents (mice, voles) and larger ones (rats, water voles). For a humane trap of category A, 80% and 90% of 12 test animals should be irreversibly unconscious within

- ▶ 30 s and 60 s (small rodents)
- ▶ 45 s and 90 s (larger rodents)

For relatively humane traps of category B, 80% and 90% of 12 test animals should be irreversibly unconscious within

- ▶ 60 s and 120 s (small rodents)
- ▶ 90 s and 120 s (larger rodents).

However, if a sufficient number of traps for the target species have been assigned to category A, traps of category B will be no longer accepted.

In conclusion, the draft guidance sets out high standards for the efficacy and animal welfare testing of traps. It was assumed by a representative from the trapping industry that about 70% of traps on the market will fail to fulfill the agreed criteria.



### 3 Main outcomes of the 2<sup>nd</sup> NoCheRo Workshop

Overall, the draft guidance received positive feedback from the workshop members. Most participants were of the opinion that an objective assessment of traps is necessary to improve animal welfare of non-chemical rodent measures, to identify inefficient traps and to provide criteria to collect data used for the comparative assessment of non-chemical alternatives with rodenticides within the biocidal substance approval.

Several representatives of competent authorities indicated that the toolbox for rodent management should not be limited and that anticoagulants are considered to be necessary to control rodents effectively for public health reasons, while traps are seen as a complementary tool.

During the discussions of the draft guidance, different aspects were addressed that should be refined:

- ▶ One aspect concerned the effects of rodent break back/snap traps on non-target organisms, i.e. unintentionally killed, caught or harmed animals, that should be dealt with in the draft guidance. If a trap is intended for professional use, efficacy has to be proven in field trials and catches of non-targets must be recorded. However, there is no threshold in the current draft guidance defining a justifiable number of caught/killed non-targets. Additionally, the impact on non-targets is not assessed if efficacy is proven in semi-field trials (with traps intended for non-professional use). In order to allow traps to be included in a comparative assessment, an environmental risk assessment of traps would be needed. A representative from the industry suggested to test the traps in safety stations, comparable to the use of rodenticides in bait stations to minimize risks for non-targets. The working party will think of ways to assess the impact of traps on non-targets and refine the draft guidance accordingly.
- ▶ The role of the lure in the trap was also brought up by the audience. It was objected that the type of bait influences the response of the target species. For the testing of traps, the manufacturer can recommend a bait used during trials. For a comparison between different bait types, it was proposed that the bait formulation should be harmonized. The working party pointed out the importance to assess the effectiveness of traps as a combination of the trap with the recommended bait like it is intended to be used in rodent control operations by the manufacturer. Therefore, it was concluded that bait can and should differ between traps. Furthermore, in the ECHA (2018) Guidance on the BPR, the alternative food offered next to rodenticides is not defined either, but it can influence the uptake of the rodenticide and therefore its efficacy. A recommendation for a standard alternative diet for testing traps will be included in the final draft of the guidance.
- ▶ The use-life of traps was also discussed with regard to their maintenance. For the approval of a rodenticide, its shelf-life needs to be tested. It was proposed that the efficacy of traps that were stored for a longer period needs to be tested, too. The working party replied that the active ingredients in rodenticides may degrade over time, which is why their shelf-life is assessed. However, mechanical traps do not degrade comparably to rodenticides, therefore, testing shelf-life is not applied to traps. However, the use-life of trap is an important factor

influencing the effectiveness of a trap. Therefore, a quality/reliability test was included in the draft guidance.

- ▶ It should be highlighted that the differentiation in traps of category A and B (welfare impact) is due to animal welfare reasons and a motivation to manufacturers to build better traps. If a sufficient number of traps has been assigned to category A, traps of category B will be no longer approved.
- ▶ It was objected that the reasoning behind conducting different tests for professionals and non-professionals are quite confusing. The working party will add more details on their considerations on that and will discuss whether and how this differentiation might affect the outcome of a future comparative assessment.
- ▶ It was stated that the Best Practice Code for Trapping that is included in the draft guidance (Appendix 2) needs some additions. It should explain how to proceed with trapped animals that are still alive. It should furthermore implement instructions how to handle and dispose dead animals. Finally, it should give advice how to clean and store traps safely.

## 4 Outlook

In a panel discussion, the next steps to be taken in order to refine the draft guidance were talked over. First, the working party will revise the draft guidance and will address the points of critique as summarized in chapter 3. Then, the draft guidance will be shared with all participants of the workshop for an additional commenting period and will be finalized afterwards.

DG Santé and ECHA will reflect on the appropriateness to consult the Biocidal Products Committee (efficacy working group) of ECHA on a revised version of the draft guidance. DG Santé will reflect on the most appropriate way to use data on traps efficacy generated according to the guidance in the comparative assessment under Article 23(3) of the BPR. Furthermore, the guidance could be used for a voluntary European certification system, concerning efficacy and animal welfare of traps. The implementation of the certification system will be discussed later. It is envisaged that the trapping industry could demonstrate product compliance with the agreed criteria on a voluntary basis based on this certification system. Additionally, this gives authorities the opportunity to decide on the humaneness of traps based on robust scientific data.

The final draft Guidance for the evaluation of rodent traps Part A break back/snap traps will be made available for download on the following UBA website:

<https://www.umweltbundesamt.de/en/topics/chemicals/biocides/workshop-non-chemical-alternatives-for-rodent>

## 5 List of references

ECHA (2018) Guidance on the Biocidal Products Regulation, Volume II Efficacy - Assessment and Evaluation (Parts B+C). Version 3.0.

Parrott, D.; Quy, R.; Van Driel, K.; Lurz, P.; Rushton, S.; Gurnell, J.; Aebischer, N; Reynolds, J. (2009) Review of red squirrel conservation activity in northern England. Natural England Commissioned Report NECR019. Natural England, Sheffield, UK

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