

For our Environment

Umwelt 
Bundesamt

Biased perception of humaneness in rodent control: rodenticides vs traps

Erik Schmolz

German Environment Agency
Section IV 1.4
Health Pests and their Control

Anton Friesen

German Environment Agency
Section IV 1.2
Biocides

Assessment of Animal Welfare impact of traps

Public perception is that traps are less humane than rodenticides

No certification or authorisation = no evaluation, no information

Uncertainties if a trap can be used in accordance to animal welfare regulations (in principle always an *a posteriori* decision)

Hence, the Draft Guidance (as well as other regulations on traps) deal at great length with animal welfare impact

Provides test descriptions and criteria for animal welfare, as it is agreed that they would be of great importance for users

Humaneness of rat poison

Typical description of effect of a rodenticide on its target:
***“The rats die after some time from a state of exhaustion
often in their typical sleeping position”*** (Platen, Das Rattenbuch, 1997)

Rodent carcasses often appear physically unharmed – suffering is not evident

Only about 10% of carcasses are found – death is largely invisible

Humaneness of rat poison: scientific assessment

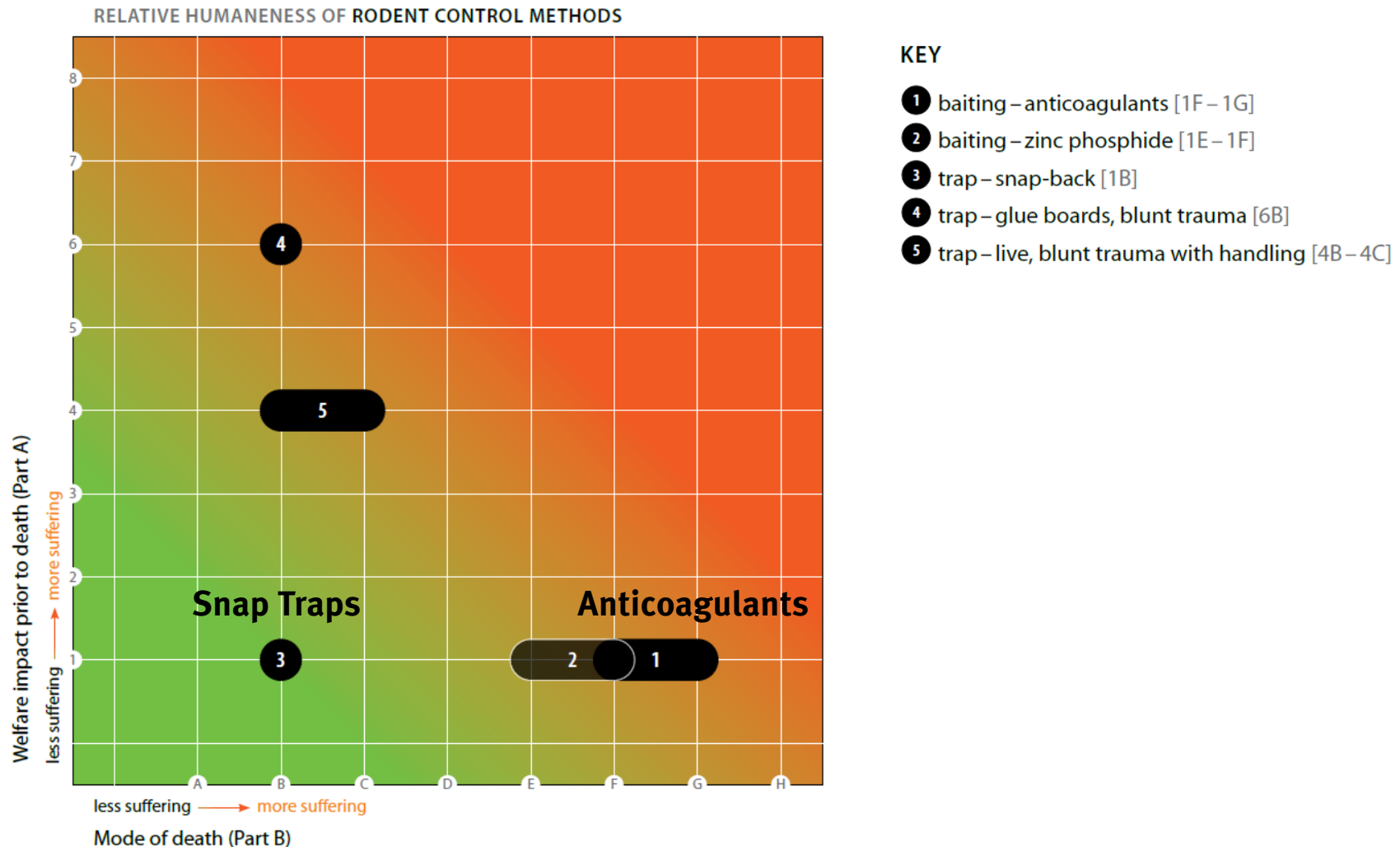
Overall impact on welfare	Duration of impact				
	Immediate to Seconds	Minutes	Hours	Days	Weeks
EXTREME	5	6	7	8	8
SEVERE	4	5	6	7	8
MODERATE	3	4	5	6	7
MILD	2	3	4	5	6
NO IMPACT	1	1	1	1	1

Scoring matrix for assessment of humaneness:

- Welfare impact prior to death
- Duration of impact

Sharp T, Saunders G. (2011) A model for assessing the relative humaneness of pest animal control methods (2nd ed.). Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT.

Humaneness of rat poison: scientific assessment



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Humaneness of rat poison

German Animal Welfare Act (TierSchG)

Article 13 (1)

Prohibited to use devices or substances ... if this involves a risk of avoidable pain, suffering or harm to vertebrate animals; **this shall not apply to the use of devices or substances approved under other legislation.**

As a consequence, use of an authorized biocide gives the user immunity to persecution according to the Animal Welfare Act as long as its used according to the label instructions

How is then the animal welfare impact of rodenticides addressed in the authorization process for biocides, and which decisions were made so far?

Assessment of Animal Welfare under the BPR

Rodenticides which are used to protect human health or manmade materials are subject to authorisation according to the **Biocidal Products Regulation EU 528/2012 (BPR)**

BPR stipulates an authorisation procedure including a comprehensive risk assessment for human & animal health, the environment, assessment of efficacy, and ...

.... **effects on target animals!**

Art 19: Conditions for granting an authorisation

,A biocidal product [...] shall be authorised provided the following conditions are met:

[...]

*(ii) the biocidal product has no unacceptable **effects on the target organisms**, in particular unacceptable resistance or cross-resistance or...*

...unnecessary suffering and pain for vertebrates'

Art 19(1)(b), criterion (ii), BPR

Annex VI: Common principles for the evaluation of ,Effects on target organisms'

'An assessment shall be made to demonstrate that the biocidal product does not cause unnecessary suffering in its effect on target vertebrates.

This shall include an evaluation of ...

- the **mechanism** by which the effect is obtained,*
- the observed effects on the **behaviour** and **health**,*
- the **time necessary to obtain the death** and*
- the **conditions under which death occurs**'*

number 49, Annex VI, BPR

Annex VI: Common principles for the evaluation of ,Effects on target organisms'

*'A biocidal product intended to control vertebrates **shall not** normally be regarded as satisfying criterion (ii) under point (b) of Article 19(1) unless:*

- ***death is synchronous with the extinction of consciousness, or***
- ***death occurs immediately, or***
- ***vital functions are reduced gradually **without signs of obvious suffering.*****

number 76, annex VI, BPR

Evaluation of ,Effects on target organisms‘ by the example of anticoagulant rodenticides

*‘slow acting anticoagulant rodenticides [...] do **cause pain for several days** in rodents and are generally **not** considered as **a humane** method to control rodents.*

*Other, **more humane** [chemical and non-chemical] control methods **are** available.*

*However, as there are concerns whether these alternatives are **sufficiently effective** or do present other practical or economical disadvantages, anticoagulant rodenticides containing biocidal products should be accepted.’*

Assessment Reports for anticoagulants, 2016



Conclusions for rodenticides

Most authorised **rodenticides are not humane** as they cause suffering and pain for vertebrates

No (quantitative) assessment of animal welfare has been carried out for rodenticides under BPR **although**

- Animal welfare is a **condition for granting an authorization**
- Principles of evaluation are defined in the BPR
- Scientific criteria for evaluation of animal welfare for rodents are available (e.g. scoring sheets for humane endpoints in animal experiments, developed in the framework of Directive 2010/63/EU)

Conclusions for non-chemical rodent control measures

- **Biased perception** of mechanical killing devices in comparison to poisons with regard to animal welfare
- **Double standard** in the assessment of animal welfare of traps and rodenticides
 - Sophisticated assessment of alternatives while rodenticides have been evaluated very vaguely

Thank you for your attention!

Anton Friesen

Anton.Friesen@uba.de

Erik Schmolz

Erik.Schmolz@uba.de

For further information on the authorisation of anticoagulant rodenticides visit:

<https://www.umweltbundesamt.de/publikationen/authorisation-anticoagulant-rodenticides-in>

