



23rd May 2025

BPC-55: Minority position of the Spanish Competent Authority on the proposal to ban alpha-Bromadiolone for indoor use against house mice (*Mus musculus*) by the general public (PT14)

The Spanish Competent Authority (ES CA) is very concerned about the recommendation to ban the use of alpha-Bromadiolone against house mice indoors by the general public on the basis that traps are considered a suitable non-chemical alternative for such use.

In the third-party consultation carried out in the context of the analysis of alternatives required for the approval of the renewal of rodenticide active substances with an anticoagulant mode of action (AVKs), new information was provided suggesting that traps may be an alternative to be used in house mouse infestations. Of the seven field trials submitted against house mouse indoors, four showed sufficient efficacy (*i.e.*, a rodent population reduction of $\geq 90\%$), two studies showed a population reduction of $< 90\%$ and one submitted study was not performed according to the relevant guidance and is therefore invalid. Thus, the field trials provide somewhat different results regarding the efficacy of trapping under field conditions. Rather, the results underline the already existing finding that the efficacy of traps can vary greatly depending on factors such as design, bait formulation, initial number, the location of application and local circumstances such as the availability of alternative food sources and food preferences of the local rodent population. All these conditioning factors highlight the fact that the efficacy of traps is highly variable.

While the ES CA does not question the assessment of the abovementioned trial on the efficacy of traps, we do not believe that the traps as a whole can be considered as a non-chemical alternative, but only those used in the field trials and in the way they have been used. In addition, there is no harmonised regulation in the EU internal market that establishes minimum quality standards for this type of product or ensures a minimum of information at the time of sale and use. This means that traps as a non-chemical alternative have a high margin of error, especially in handling by the general public, which is an enormous disadvantage considering that small infestations must be dealt with as soon as possible to prevent them from reaching a larger scale. Therefore, the general public must have an effective measure to quickly deal with a possible infestation in their home before it gets out of control and requires the intervention of a pest control operator, with the consequent increase in cost and time of the rodent control procedure. This is particularly relevant in Member States where the presence of the harmful organism is higher.

In addition to the lack of evidence on the efficacy of untested traps, there is the fact that mouse carcasses must be removed by the general public as the traps are placed in strategic locations in the infested area, also relatively easily accessible to people. This practice should involve the use of gloves as personal protective equipment (PPE) to avoid transmission of any pathogens present on the animal, the presence of which increases exponentially in relation to the time it



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takes to remove the carcass. This need implies that the general public should have some experience to handle the traps effectively and safely, but this experience is neither passed on at the time of sale nor informed at the time of use in the absence, as mentioned above, of any regulation of these products on the EU market. Furthermore, in the context of the Biocidal Products Regulation (BPR), the use of PPE as a risk mitigation measure is not considered acceptable in the case of the general public and therefore, in a similarity with the BPR, their use could not be considered safe.

Finally, and also in relation to the possible lack of safety in the use of traps, incorrect handling of the traps themselves can lead to incidents, especially in the case of toddlers and pets, with potentially irreversible injuries.

In summary, the lack of a European standard requiring minimum specifications means that traps cannot be considered a more effective and safer alternative to AVKs, since inappropriate use (which is likely due to the lack of indications) may lead to a lack of efficacy and inappropriate design (which is likely due to the lack of regulation) may lead to a lack of safety.

For all the above reasons, the ES CA does not consider traps as an alternative to the use of alpha-Bromadiolone for indoor use against house mice (*Mus musculus*) by the general public.