GUARDIAN
PEST CONTROL

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We have been involved in the supply of professional pest control services for 0ver 30 years and run a small pest control company with around 200 Contract service clients.

Over the years we have seen a number of changes in the use of 2nd generation anticoagulants (SGARS/AVKs)and have adapted our treatments accordingly . In the recent 2 years there have been even more stringent requirements made of us some of which we have welcomed and embraced such as the discontinuation of outside permanent baiting .

But in our opinion the complete withdrawal or restriction of use of the SGARS to be Used in "BAIT Boxes" only would be severely detrimental to the control of the rat population in the UK.

Most of our clients are suppliers within the Human food chain and rely on us to prevent and protect against the dangers of rodent borne diseases effecting food for human consumption and whilst every effort is made to prevent rodents in the first place entering buildings through environmental management this is not always possible.

The implications of the withdrawal of the AVKs is massive both to Human health and commercial interests as in many cases there is no viable alternative.

In a recent treatment of ours on a Dairy farm the client was seeing between 200-300 rats per night taking cattle feed and contaminating /damaging machinery. In a treatment of this case the possibility of trapping that amount of rats would be impossible so we had NO alternative than to use the AVks.

In the last year we have seen rodent damage cause £1000,s worth of damage and we are only a very small company this multiplied across Europe would be astounding.
With an ever increasing population of Rats in the Uk and Europe the loss of these rodenticides would be immeasurable and by the time it was realized we need these substances back it would be to late.

We would urge the ECHA not to remove these AVKs from use and allow us as fully trained competent professionals to continue with their use

Yours faithfully
[redacted]
12/02/16

npta National Pest Technicians Association

PROMPT PROFESSIONAL PEST CONTROLLERS REGISTER

THINK WILDLIFE Campaign for Responsible Rodenticide Use