Comments submitted by: Command Pest Control Ltd, UK

Dear Sir/Madam,

Re : Anticoagulant (AVK) Rodenticides.

I am the owner of a pest control business that has been in operation for 30 years. I am told that we are the tenth largest pest control business in the UK and we employ around 70 staff. Our company is heavily involved in serving the agricultural sector which is what we call the dirty end of the pest control business where we are called upon to control some serious rodent infestations, not to chase one rat around a warehouse. However we are also involved in other areas of pest control and whether we are asked to kill rodents in animal housing to prevent disease or removal of rodents from some appalling living accommodation where rats are crawling over small children the need to have a range of methods available to us is essential.

I am also the owner of a farming business, good rodent control is essential in preventing food crops becoming contaminated from rodents and unfit for consumption. It is very difficult to sell grain into the trade without a farm assured approval, successful rodent control is part of that approval.

Rodent control is not an exact science, we are dealing with nature and what works today may not work tomorrow so the ability to be well trained and have many different formulations available to the pest controller is the only way to control infestation.

The European professional pest control industry plays an important role in protecting public health and keeping homes, schools, farms, food stores, food manufacturers, retail companies and other safe, pest and disease free. The European pest control industry is worth in excess of 3000 million Euros
And employs more than 40,000 people in over 10,000 companies throughout Europe.

Rodent control is essential to public health and in many cases is a legal requirement to prevent disease transmission and contamination of food.

Anticoagulant rodenticides (also referred to as AVKs) are the most effective and dominant substances for rodent control. Therefore the current AVK active substances for PT14 will continue to be essential for effective rodent control in order to maintain good public health and hygiene.

The original evaluations for the first approval at EU level recognised the need of the AVKs. The corresponding Assessment Reports for the AVKs acknowledged this when they concluded that:

According to the Annex I inclusion criteria referred to in Article 10 of the Directive and TNsG on Annex I inclusion, AVKs should not be included in Annex I. However, in the decision making also benefits of using the active substance in the biocidal products have to be considered (Paragraph 96 in Annex VI of the Directive).Rodent control is needed to prevent disease transmission, contamination of food and feeding stuffs, structural damage and social abhorrence. Currently anticoagulants are the dominating substances in rodent control. Fourteen rodenticides are included in the review programme of the existing biocidal substances, and nine of these substances are anticoagulants, two are gases and three are non-anticoagulants. It is concluded that AVKs are needed as rodenticides for human hygiene and public health reasons. In this exceptional case the benefit should take precedence over the risks and AVKs should be included in Annex I.

All of the AVKs meet one of the exclusion criteria under Article 5(1) of the Biocidal

Products Regulation which prohibits their approval unless one or more of the derogations provided for in Article 5(2) are met. It is our conclusion that two of the derogation conditions are met, namely:

a/ Art5(2)(b) it is shown by evidence that the active substance is essential to prevent/control serious danger to human/animal health or the environment;
b/ Art5(2)(c) not approving the active substance would have a disproportionate impact on society when compared with the risk to human health, animal health or the environment arising from the use of the substance.

Over the past 30 years we have seen the pest control industry become far more professional and regulated. It is essential that any pest control carried out using toxic substances is carried out by trained and certificated staff. Good well managed rodent control using selected AVKs enables a site or premise to be virtually free of infestation. Going back several years before these well engineered AVKs chemicals were provided, if we came across a heavy infestation we would need to apply to the Ministry of Agriculture for permission to use very toxic substances that put non target species at risk as well as the environment.

Our recommendation is :

a/ That anti-coagulants should remain accessible for trained pest control management professionals as long as no viable alternative is available to manage pests endangering the health of humans, animals and the environment they live in.

b/ That through the publication of a European standard (EN16636) and the promotion of certification to this standard (the CEPA Certified scheme), the European Pest Management industry contributes to identify trained and certified management professionals.

Yours faithfully,

Command Pest Control Ltd, UK