Public Consultation on Potential Candidates for Substitution

Response from the British Pest Control Association

[redacted]

II. Organisation

Submitting Information on behalf of an organisation or institution: an Trade Association

Organisation Name: The British Pest Control Association

Legally based in: United Kingdom

III. General Information:

1. The European professional pest management industry plays an important role in protecting public health and keeping homes, schools, recreational areas, hotels, food manufacturers, retail companies and others safe, pest and disease-free. The European pest management industry is worth in excess of € 3000 million, employs more than 40,000 people in over 10,000 companies throughout Europe, the majority of which are small and medium sized enterprises.

2. We propose to take all the AVKs together, and this submission applies equally to all the eight AVK substances being considered as Candidates for Substitution.

3. In BPCA's opinion they remain essential to the delivery of effective rodent control, and hence the protection of Food Safety, Public Health and Animal Health. There is a complete lack of viable and effective alternatives which could realistically substitute for the use of all these Rodenticide active substances. Such loss of products vital to control rodents could be disastrous.

4. Failure to control rodent populations adequately can result in serious consequences for human health e.g. transmission of disease. In the UK alone in 2014 there were 76 cases of leptospirosis, rising from 47 cases in 2013[1]). Rodents can also carry diseases such as campylobacter and salmonella. In a study on the socio-economic impact of infectious intestinal disease in England, average costs per case were £606 for

[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404107/hpr0515_zoos.pdf

Salmonella and £315 for *Campylobacter*[2]. This would equate to a cost of £135 million in 2002 for the EU and Norway. A study by Battersby[3] stated that the total costs due to infrastructure damage by rodents were difficult to estimate. However, a model was constructed that estimated the cost to the economy of such rodent damage in the UK could be between £61.9m to £209m (with the cost to farming between £16 to 25m[4]). The study indicated that the size of the rodent control industry in the UK indicates that the higher figure is more likely.

5. There are no benefits from the substitution of the anticoagulant rodenticides, only the significant negative impact on public health as outlined above and below. There are no alternatives available that provide the same utility and efficacy as the anticoagulant rodenticides. Although there are a number of alternative chemical rodenticides approved under the Biocidal Products Regulation each has significant limitations compared to the AVKs:
   - **Alphachloralose:** This substance is only used for mouse control indoors and is not approved for the control of rats.
   - **Aluminium phosphide:** This fumigant is used only by specially-trained professional pest control technicians. It cannot be used in proximity to buildings because it works by the evolution of a toxic gas which cannot be fully controlled when it has been produced. Although valuable in some circumstances, this property makes aluminium phosphide inappropriate for most rodent control situations in the built environment.
   - **Hydrogen cyanide:** Like the previous active substance this is used only by specially-trained and equipped professionals as a fumigant in hermetically-closed structures.
   - **Carbon dioxide:** Once again, this substance is currently restricted for use only against mice indoors. It is dispensed using a special automatic application device which is appropriate only in limited practical use situations.
   - **Powdered corn cob:** In comparison with other PT 14 active substances, powdered corn is relatively new to the market. Practical experience of its use is limited and information from published literature on its efficacy is scarce. Pest controllers do not support its widespread use.

6. As a result of these limitations the vast majority of rodent control operations in the EU are conducted using the anticoagulant rodenticides, and will be so for the foreseeable future. The anticoagulants are widely used because they are generally efficacious, practical in use and, in comparison with the acute rodenticides that preceded them, have valuable safety characteristics.

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[2] Roberts JA, Cumberland P, Sockett PN, Wheeler J, Rorigues LC, Sethi D, *et al*, The study of infectious intestinal disease in England: socio-economic impact. *Epidemiol Infect* **130**:1–11 (2003).

[3] Battersby, S., Public health policy – can there be an economic imperative? An examination of one such issue. Journal of Environmental Health Research, Volume 3, issue 1 (2004).

[4] http://www.pestcontrol-expert.com/bayer/cropscience/bespestcontrol.nsf/id/28BBEEF2A2B14CEEC125798400560693/$file/Rodilon%20user%20guide%20and%20record%20book.pdf

7. There are some alternative techniques to anticoagulant rodenticides for the management of rodent infestations, although none of these are considered to be as cost-effective and efficient as the use of an efficacious rodenticide. These alternatives fall into two broad categories; those aimed at killing rodents (e.g. traps, glue/sticky boards) and those that aim to restrict either their population size (habitat modification) or access of populations to vulnerable areas (repellents and proofing/exclusion). They provide useful and efficacious complementary techniques to the use of anticoagulant rodenticides for controlling rodents but are not considered to be replacements for them.

- **Rodent Trapping:** Traps, either spring traps or break-back traps, designed to capture and kill rodents are useful in some circumstances. However, their effective and humane use requires a high degree of skill and when necessary they should be set in tunnels to avoid adverse impacts on non-target wildlife, pets and children. They may not kill cleanly and therefore should be checked daily so that animals captured, but not killed, may be humanely despatched. Such traps may be effective in situations where infestations are small but are unlikely to be cost effective against large and dispersed rodent infestations. Live-capture traps have the advantage that, if they are checked frequently, captured non-target animals can be released unharmed. Some authorities recommend that these traps are checked twice daily. Captured target animals must be despatched humanely, because in some Member States it is illegal to translocate and release them. Once again, these traps may provide effective control of small infestations, particularly of mice.

- **Glue Boards:** Glue or sticky boards are available in some countries and may provide effective control in limited circumstances. Like traps, they may capture non-target animals and birds and must be checked at least twice daily. Untrained users of glue-traps are unlikely to know how to despatch humanely the rodents caught on the adhesive surface. A YouGov poll of 2,000 British adults found that more than half[5] of those surveyed either would not know what to do with an animal caught on a glue trap, or would recommend an action that risked committing an offence under the Animal Welfare Act (2006). BPCA is seeking a ban on public use of these products, and has actively worked to introduce a code of best practice for their use by professional Pest controllers.[6]

- **Habitat modification:** Rodents require food, harbourage and, in the case of rats, water in order to establish troublesome infestations. Such infestations will either not establish at all, or will be limited in size, if any of these requirements is denied. Habitat modification alone will not control an existing infestation but is often used as a preventative measure when control has been achieved using a chemical control method.

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[5] 'Inhumane, Indiscriminate, Indefensible' policy document (Humane Society International, 2015)

[6] Pest Management Alliance Code of Best Practice on Humane Use of Rodent Glue Boards
http://www.bpca.org.uk/pages/index.cfm?page_id=399&bpca_codes_of_best_practice

- **Repellents:** There are currently no chemical repellents for rodent control approved under the Biocidal Products regulation. It is considered that there is no convincing scientific evidence that ultra sound and electromagnetic devices are effective.

- **Rodent Proofing:** Preventing the access of rodents to vulnerable buildings by proofing is an important requirement in sustainable rodent control but it will not control an existing infestation. Proofing is particularly difficult to implement and maintain in respect of house mouse infestations.

8. Rodent control is needed to prevent disease transmission, consumption and contamination of food and feedstuffs, structural damage and to remove social abhorrence. Currently the anticoagulant rodenticides (AVKs) are the dominant substances in rodent control. Therefore, the current AVK active substances approved for PT 14 will continue to be necessary for efficient and effective rodent control in order to maintain good public hygiene and protect public health. The original evaluation at EU level recognised the need of the AVKs. The original Assessment Reports for the AVKs acknowledge 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 feedingstuffs, 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.

    [*The text above is a generalised extract based on the conclusions of the Assessment Reports of the AVKs*]

9. All of the AVKs meet one of the exclusion criteria under Article 5 (1) of the BPR which prohibits their approval unless one or more of the derogations provided for in Article 5 (2) are met. It is our contention that two of the derogation conditions are met, namely:

    (b) it is shown by evidence that the active substance is essential to prevent or control a serious danger to human health, animal health or the environment; or

(c) not approving the active substance would have a disproportionate negative impact on society when compared with the risk to human health, animal health or the environment arising from the use of the substance.

10. A comprehensive report from experts (Risk Mitigation Measures for Anticoagulant Rodenticides as Biocidal Products[7] commissioned by DG Env) has been published 'with the aim of identifying the best practice available and whenever possible to define a harmonised strategy at the EU level' which 'will certainly contribute to the responsible and sustainable use of anticoagulants rodenticides, reducing the risks posed to human health, animal health and the environment by these products.' The RMM report identifies the features of an ideal rodenticide and then concludes 'It will be difficult to find a rodenticide that can meet more of the above features than the anticoagulant rodenticides' and also that 'alternatives to AVKs are limited today.'

11. Although there are a number of alternative chemical rodenticides approved under the BPR, none offer the utility and efficacy provided by the AVKs as acknowledged by the experts in the RMM report. As a result of these limitations, the vast majority of rodent control operations in the EU are conducted using the anticoagulant rodenticides, and will be so for the foreseeable future. The anticoagulants are widely used because they are generally efficacious, practical in use and, in comparison with the acute rodenticides that preceded them, have valuable safety characteristics.

12. Compliance with EN 16636, certified by a third party, will enable pest management providers to demonstrate that they have the necessary competence and know-how to deliver pest management services, that they have a management system to ensure a consistent level of quality and that they systematically minimise risks for clients and the public as well as for potential negative impacts on the environment and animal welfare. The initiative directly contributes to the implementation of IPM principles and thus to the sustainable use of biocidal products.

13. Very little has changed in the time between the initial review of the AVKs and the renewal dates. The conclusions of the original assessments remain valid, especially given the lack of significant new data, the latest information on resistance across the EU and the continued lack of credible alternative active substances to control rodent pests and protect public health as recognised by the experts in the RMM report.

14. Although until recently no common harmonized requirement existed across Europe for the licensing and monitoring of either the pest management companies themselves, or the technicians who undertake the application, negotiations with the European Standards Institute (CEN) and industry experts in March of 2015 resulted in the publication of a European standard for the pest management industry. EN16636 and CEPA Certified®, its accompanying certification scheme, have since been launched and both the pest management sector and end users from relevant industries, not in the

[7] Available at https://circabc.europa.eu/w/browse/d66ad096-37a1-4903-a3e0-24607ca3f3ea

least the food industry, have begun responding by seeking certification and requesting certified operators in tender questionnaires.

15. One should remain vigilant vis à vis the public health consequences if the means to adequately control rodent populations in Europe were to be curtailed. As today no significant and effective alternative to anti-coagulant rodenticides is readily available and that a major infestation would have serious consequences for the public health situation (rodents have been identified as vectors in Xavier Bonnefoy's WHO report, responsible for leptospira and more than 30 other diseases in humans) the use of anti-coagulants remains essential in order to manage pest populations successfully.

16. Our recommendation is:

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

    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 pest management professionals.

Submitted by the British Pest Control Association, 12 February 2016