Comments submitted by: Mitie Pest Control, UK

Dear BPC Secretariat,

I am extremely concerned to hear about the potential loss of AVK active substances from our product options that are needed to fight the threat of rodent-borne disease. There are currently no other products that can fully replace these, and if they were to be banned then I fear rodents and the diseases they carry would cause very severe public health problems. The next best control technique is the use of break-back traps. However, whilst these are very useful in some situations, they are very labour intensive (so would make professional pest control unviable in other scenarios), and rodents can learn that the traps are harmful to them and become trap shy.

Whilst biocides containing these AVK active substances have been used excessively in the past, we now have a stewardship system introduced into the UK to ensure responsible use by all professionals involved in rodent control: pest control companies, farmers and gamekeepers. In my view this hugely reduces the risk of these products to wildlife and the environment and will help to ensure focussed control of the rodent threat.

For a more detailed assessment of the dire consequences of banning the use of these products, please refer to the list of points below drawn up by our trade organisation, the British Pest Control Association:

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. Rodent control is essential, and in many cases a legal requirement, to prevent disease transmission, consumption and contamination of food and feeding stuffs, structural damage and to remove social revulsion.

3. Currently, the anticoagulant rodenticides (also referred to as AVKs) are the dominant and most effective substances for rodent control. Therefore, the current AVK active substances approved for PT 14 will continue to be essential for efficient and effective rodent control in order to maintain good public hygiene and protect public health.

4. 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 complementary techniques to the use of anticoagulant rodenticides for controlling rodents but are not considered to be replacements for them.
5. 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 least the food industry, have begun responding by seeking certification and requesting certified operators in tender questionnaires.

6. 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.

7. 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.

8. 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.

I beseech you to ensure that we can continue to use these products unless and until there are suitable alternative active ingredients available.

Regards,

Mitie Pest Control