Comments submitted by: Beaver Pest Control LLP, UK

To the BPC secretariat,

I run my own company and also sit on the Servicing Committee of the BPCA and National Pest Advisory Panel.

I am very concerned that the eight anticoagulant rodenticides (also known as AVK) have been identified as candidates for substitution under BPR. We as a company are completely opposed to this both in the interest of public health and due to the lack of viable alternatives for rodent control.

We feel that the loss of these products would be a disaster in the fight against rodents and in particular rat control and potential disease transition. Since the withdrawal under BPD of formulations such as anticoagulant concentrates and contact dusts we have struggled to manage rodents; In London there is strong behavioural resistance which has been a significant recent challenge with the use of baits but also with glue boards and mechanical traps. The use of AVK within our armoury is therefore essential as part of an IPM system.

A recent report in Liverpool has outlined the fact that call outs for rats has increased dramatically within the last few years due to less viable products being available. We need more actives, not less.

I would also like to express my belief that pest control companies within the UK are rapidly becoming more environmentally conscious and formal training via CPD and audits are increasing professionalism. Indeed compliance to European Standards (EN16636), which we are presently being audited against, will assure that care is taken in the future use of AVK.

In conclusion, I cannot express how strongly I feel that AVK must remain a part of the UK's armoury in the fight against rodents, contamination, waste, damage and the very real risk to public health. Please take my concerns into consideration, in my view these substances must not be banned.

Kind regards