Comments provided by: Guest & Sons Ltd, UK - Company-Downstream user

*General information*
Common to all substances:

There is no genuine direct replacement for anticoagulant rodenticides.

They are unique in their mode of action & in the reliability of their effectiveness.

Various forms of trapping can be effective when dealing with single infesting rodents, but when a large population of rats or mice has resulted, only anticoagulants can bring about a complete clearance.

Powdered corn cob has been much heralded as a safe replacement rodenticide.

Whilst this may kill effectively under laboratory conditions where rodents have their food restricted to this material only, in our company's direct experience it appears the much wider choice of foods available to rats & mice in the wild prevents sufficient opportunity for rodents to be chemically starved/dehydrated by such cellulose-based materials.

Our company continued achieving good results using first-generation rodenticide baits well after the stronger difenacoum & bromadiolone baits had become available, when the expressed wisdom of our industry was to use only second-generation baits simply because they were stronger & therefore "better".

Our caution, as a business that had been operating in pest control for over 60 years at the time, was based on a perceived need to keep the second-generation baits 'in reserve' as much as possible, whilst still exploiting the susceptibility of rats & mice in local areas to first-generation baits as long as that should continue.

The vast majority of prospective clients that contact our company have attempted treatment of a rat or mouse problem themselves and only when the situation has become out of control have they braced themselves to request assistance.

Their clear expectation - despite having used many of exactly the same baits which we have been also permitted to use - is that we must have something "stronger" or "better" available that we can then use to speedily resolve their problem.

Even though our company is based centrally in an area of high resistance to bromadiolone recorded in 2010, we did not experience wholesale resistance to difenacoum or bromadiolone at the time nor since on sites managed by us.

We have had 2 or 3 sites on a one-off basis where resistance could have been indicated, but these were resolved either by persistence or by the temporary use of pulse-baiting/potentially single-feed second-generation anticoagulant rodenticide baits.

We have not found that the total population of rats on client sites has been steadily climbing over the years.

Anticoagulant rodenticides, in particular the second-generation multiple-feed rodenticide baits, have proven their worth in bringing heavy rodent infestations back under control

over so many years now that the end results tend to be regarded by many outside our industry as a natural absence of rats & mice.

This then has prompted their argument that these materials should be banned, rather than to recognise the hard work that has gone on for decades in order to achieve & maintain the current situation.

In order for our industry to be able to continue to provide a service that is perceived by its clients as being technically effective, useful, supportive of community health expectations & justifying a cost which matches the benefits resulting, full-time pest controllers - suitably trained & experienced, or trainees working under the direct & strict supervision of such a person - need to retain access to a range of these materials since each active offers its own special opportunity for effective rodent control. In particular, there should be exclusive access to pulse-baiting/potentially single-feed second-generation anticoagulant rodenticides.

Eight actives may at present be approved, but this does not mean that the same results could be obtained with one active only, let alone none at all.

Substance-specific

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The continued use of brodifacoum baits in these circumstances should therefore be permitted.

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The advantage of bromadiolone over other bait active ingredients has been understood to be because it has a 'cleaner' taste than the others. Rats are neophobic & therefore fussy eaters, so bait with less 'off flavour' detectable by them should increase their acceptance & consumption of the bait.

Rats are also slightly more susceptible to bromadiolone than to difenacoum.

The continued use of bromadiolone baits should therefore be permitted

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Where difenacoum can be used to deal with mice it has the advantage of mice being significantly more susceptible to it than the same w/w concentration of active ingredient in bromadiolone bait.

Its continued use should therefore be permitted.

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Difethialone is the most recently developed anticoagulant rodenticide available in the UK and is claimed by its manufactures to be a genuine single-feed second-generation anticoagulant rodenticide bait.

If so, as such it provides a useful alternative to brodifacoum and flocoumafen.

The continued use of difethialone baits in these circumstances should therefore be permitted.

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The continued use of flocoumafen baits in these circumstances should therefore be permitted.

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The distinct advantage of first generation rodenticides over second-generation rodenticides is that the time they will stay resident & active in the environment is measured in days rather than months, substantially reducing their impact on it.

As gauged by its LD50 value, warfarin could be argued to be the 'mildest' in its effect on the environment.

The use of warfarin bait should therefore be retained - not for general use - but as the only rodenticide permitted for amateur use, to be supplied with a prominent notice on the front label 'FOR INDOOR USE ONLY', in order that the safety margin is maximised against the many abuses by amateurs using anticoagulant rodenticides seen by or reported to our industry over the years.