Comments submitted by: Safeguard Pest Control, UK

We are writing to raise our concerns over the intention to remove certain anticoagulant rodenticides currently available for us to utilise as an effective means for rodent control, 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 this rodenticide active substances, and it is of our opinion that these substances must not be banned at this present time until substances offered have the same, or a better effect on the control of rodents. Unfortunately this ban will undoubtedly have an effect on our business and that of our clients.

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.
The current anticoagulant rodenticides are the dominant and most effective substances for rodent control; so their use is essential for efficient and effective rodent control in order to maintain good public hygiene and protect public health. Therefore, removing these rodenticides (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'.

The anticoagulants currently used are generally efficacious, practical in use and, in comparison with the acute rodenticides that preceded them, have valuable safety characteristics.
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 as 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)
- Those that are aimed to restrict either their population size (habitat modification) or access of populations to vulnerable areas (repellents and proofing/exclusion).

These provide useful complementary techniques to the use of anticoagulant rodenticides for controlling rodents, but are not considered to be replacements for them.

Compliance with EN 16636 will enable pest management providers to demonstrate that they have the necessary competence and know-how to deliver pest management services and 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.

We would therefore request:

- 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;
- 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.

Kind regards

Safeguard Pest Control