UK Farming Unions' representation to ECHA for the justification for the renewal of the approvals for the anticoagulant rodenticides brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenacoum, difethialone, flocoumafen and warfarin.

For as long as humans have been producing food, there has been a conflict with rats and mice. It has long been known that rodents have negatively contributed to farm management, resulting in either the loss of stock, structural damage, the spread of disease or a combination of them all. It is said that 130 million people could be fed each year on the foods consumed or destroyed by rodents. While every effort should be made to exclude rodents from buildings, their intelligence, persistence, gnawing capacity, survival capabilities and small size means that infestations are inevitable. As such, action must be taken to control rodent numbers and minimise the risk that they pose on economic, health and social grounds. As rodents evolve to overcome man-made methods of control, the need to review and refresh our skills and understanding is more important than ever. There is a need to develop effective systems that will allow a national and common approach towards effective rodent management and control, to help reduce the impact of rodents.

The Campaign for Responsible Rodenticide Use (CRRU) has been given the task by UK Government of developing the UK Stewardship Regime, with assistance from a wide range of stakeholder organisations, (including the NFU and NFU Scotland) and will co-ordinate implementation. The regime is intended to provide assurance to the Health and Safety Executive (HSE), (the UK government body responsible for the regulation of rodenticides), that anticoagulants can continue to be used and their risks reduced to an acceptable level to non-target species and the environment. The progress of the Stewardship Regime will be closely monitored. It must show reducing wildlife exposure and improving user practices, with annual monitoring of anticoagulant residues in wildlife and periodic assessment of the knowledge, attitudes and practices of those who apply these compounds as professionals. Only if significant beneficial changes in these measures are seen will users, including farmers, be permitted to continue to buy and apply anticoagulants without further restriction. The future availability of these products, so important in food hygiene, public health and animal husbandry, is now more than ever in the hands of their users and is an issue of significant concern to the agricultural industry.

The UK farming unions are playing their part in increasing awareness and support for best practice stewardship measures, to ensure that rodenticides are used responsibly in ways that minimise the exposure to wildlife and other non-target animals, but without jeopardising public health and the effective control of these pests. Importantly, effective stewardship will help ensure these products' long-term availability on the market and efficacy with regards to the management of rodenticide resistance.

Rodent control is essential, and in many cases a legal requirement, to prevent disease transmission, consumption and contamination of food and feedstuffs, structural damage and to remove social abhorrence. Currently, the anticoagulant rodenticides (also referred to as ACRs) are the dominant and most effective substances for rodent control. Therefore, the

currently approved ACR active substances will continue to be essential for efficient and effective rodent control in order to maintain good public hygiene and protect public health.

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

> Art 5(2)(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;
>
> Art 5(2)(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.

A comprehensive report from independent experts (Risk Mitigation Measures for Anticoagulant Rodenticides as Biocidal Products (RMM), commissioned by DG Environment, 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 independent RMM report identifies the features of an ideal rodenticide and then concludes that '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 ACRs are limited today.'

There is a huge need to control these pests:

- To prevent feed loss and contamination
- To prevent disease transmission
- To comply with legislation
- To meet assurance standards
- To prevent structural damage
- To reduce animal feed consumption and cost
- To avoid damage to growing crops
- To prevent fires

Farmers constantly monitor for rodent activity including looking for:

- Damage to buildings
- Droppings
- Damage to feed
- Gnawing of pipes and cables
- Fresh burrows
- Footprints
- Runs and tracks
- Broken strings
- Urine pillars

UK farmers already use a wide range of Integrated Pest Management (IPM) techniques to reduce rodent populations:

- Prevention
- Monitoring
- Proofing
- Denial of Food and Water
- Removal of harbourage
- Trapping
- Glue (sticky) boards
- Aluminium phosphide
- First generation anticoagulants
- Second generation anticoagulants
- Motion-activated cameras

Although there are a number of alternative chemical rodenticides approved under the BPR, none offer the utility and efficacy provided by the ACRs as acknowledged by the experts in the RMM report.

These are described below:

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.

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.

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.

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 but are illegal in other countries. They may provide effective control in some 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.

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 and may move an infestation elsewhere. It is often used as a preventative measure when control has been achieved using a chemical control method.

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 to indicate 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.

In conclusion, very little has changed since February 2010 – when the last ACRs were included in Annex I of the Biocidal Products Directive – and July 2015 – the date of their renewal submissions under the BPR. The conclusions of the original assessments remain valid, and the continued lack of credible alternative active substances to control rodent pests

and protect public health means that the ACRs continue to be essential for efficient and effective rodent control, as recognised by the experts in the RMM report.

So because these products are used so responsibly and are vital for human health to prevent disease transmission, consumption and contamination of food and feedstuffs and structural damage it is important that they are re-registered for use throughout all member states.