Comments submitted by: Proton Environmental Ltd., UK

To Whom it may concern,

With regards to the proposal that eight rodenticide anticoagulants active substances, currently used for the proposes of the control of rodent populations, be substituted, my considered opinion is as follows:

As an experienced pest controller working in the commercial an domestic environment in London UK, it is alarming to me that this proposal is even being considered when, for the eradication of rodents within buildings, there are currently no viable alternatives to the 2nd generation rodenticides that are under scrutiny. I use the term "eradication" deliberately rather than "control", as it is not an acceptable option when a commensal rodent population is established in a residential or commercial premises to simply limit the numbers, they must be completely removed.

Using an Integrated Pest Management (IPM) strategy is of course an essential part of rodent work and we will always proof buildings and give advice to clients relating to good practice in creating as rodent unfriendly an environment as possible, but without a means of rapidly and completely removing the rodents that are already in a premises any program is doomed to fail.

The use of traps in rodent control is sometimes a very effective strategy as their effect is instant and carcasses always recovered, however both mice and rats, if they have not already developed it, very quickly develop a behavioural resistance to traps of all kinds and the effectiveness of such methods tails off until they are completely redundant. This is a phenomenon I have personally witnessed on a number of occasions in dealing with both House mouse (mus domesticus), and Brown rat (rattus norvegicus).

These two species of rodent are also known vectors for a large number of diseases: Leptospirosis, Salmonella and Hanta virus as well as numerous others, many of which are are life-threatening to humans. As these animals are by their nature commensal, it would therefore not only be naive but irresponsible to remove our means of keeping people out of harm's way when it comes to our ability to control of them. I have worked in schools and medical facilities and been able to quickly reduce and eradicate populations of rodents which otherwise would have posed obvious and unacceptable risks to vulnerable people.

I appreciate that there are environmental issues surrounding the impact of these substances on non-target wildlife, and would fully support the increased licensing/certification of pest control and a reduction in the availability of the AVKs to the general public, but it is my strongly held opinion that the dangers to health we would be exposed to following removal of these products from the hands of professionals before a viable alternative is available far outweighs the potential benefit.

Yours Sincerely,

Proton Environmental Ltd., UK