

## **PE1671/E**

### **Pest management Alliance submission of 23 November 2017**

The Pest Management Alliance are aware that representations have recently been made to the Scottish Parliament in the form of a petition seeking to ban the use of glue boards for the control of rodents.

The Alliance, an organisation comprising the National Pest Technicians Association (NPTA), British Pest Control Association (BPCA) and the Chartered Institute of Environmental Health National Pest Advisory Panel (NPAP) whilst supporting a ban on the sale and use of these products for amateur use have major concerns if this ban extends to the professional use of these products and the impact this may have on professional pest controllers ability to protect public health in Scotland.

The PMA published and recently updated a Code of Practice on the Use of Glue Boards (copy attached) for use by pest management professionals in the UK which clearly sets out the criteria for the use of these products as a last resort to protect public health when previous interventions have failed. All three organisations of the Alliance actively seek adherence by their members to this Code.

Examples of typical scenarios would be for example

- when a rat is present in a hospital operating theatre or ward,
- a rat on board an aircraft landing at a Scottish airport from a plague endemic country
- controlling 'neophobic' mice in food processing and preparation premises.

During the drafting of this Code of Practice the RSPCA was consulted, together with Natural England and Defra and amendments were made the final document receiving endorsements from the latter two Agencies.

As a consequence of this Code of Practice a similar petition made by the petitioning organisations to the government last year was unsuccessful, and the proposal for a licence to be sought for the use of the products on each occasion rejected as being impractical due to the urgent nature such control required.

The PMA therefore along with the Royal Environmental Health Institute of Scotland would oppose the petitioners proposal to ban the use of these products for professional use on the grounds stated above.

# THE PEST MANAGEMENT ALLIANCE

PMALLIANCE.ORG.UK



NEW REVISED VERSION JAN 2017

## PEST MANAGEMENT ALLIANCE - CODE OF BEST PRACTICE HUMANE USE OF RODENT GLUE BOARDS

In order to protect public health within high-risk environments, the use of rodent glue boards remains an important route if all other options are considered inappropriate. Although rodent glue boards are not designed to physically harm rodents, their use raises valid concerns and they should only be sold to or used by technicians who have been given adequate training and are competent in the effective and humane use of this technique. The following principles must be followed in order to minimise animal welfare concerns:

All interventions aimed at the removal of rodents, including the use of rodent glue boards, have the potential to harm non-target animals and the environment. Although following best practice can mitigate these risks, they cannot be entirely avoided. Therefore, the principal strategy when choosing methods for the control of rodents is to employ the method or methods that have the least potential for adverse impact (i.e. are the least severe and least likely to catch non target animals) but which will be effective in the prevailing circumstances. This is the concept of "risk hierarchy". For more information see the CRRU Code of Best Practice via [www.thinkwildlife.org](http://www.thinkwildlife.org)

The definition of a rodent glue board is "any adhesive-coated surface used to catch rodents"

### 1. Consider the risk hierarchy

All other options for rodent control must be carefully considered before rodent glue boards are used. Detailed records must show why other control methods are either considered inappropriate or have failed. Where there is a rodent in a high risk environment, it may be appropriate for rodent glue boards to be placed strategically to ensure immediate control. Use of rodent glue boards should be based on individual risk assessment, but their use should be reviewed every 24 hours.

### 2. Trained and competent user

Those selecting the use of or using rodent glue boards for rodent control should be trained and competent in their use. This normally means a relevant certification/qualification and familiarity with the Code of Best Practice for their use.

### 3. Check rodent glue boards frequently

Where rodent glue boards are used these must be inspected at appropriate intervals. This should be within 12 hours of placing, or at least as soon as is reasonably practicable, including weekends and bank holidays. The pest controller may train one or more on-site personnel

to check the rodent glue boards at more frequent intervals in order to minimise the rodents' time spent on traps and/or free non-target species, but it remains the responsibility of the pest controller (under the Animal Welfare Act 2006) to deal with any animals trapped on the rodent glue boards, and to revisit at a minimum of every 12 hours.

If unavoidable events cause slight extensions to inspection intervals then the reasons should be recorded. Longer delays must be avoided (see contingency plan below). Where possible and practical, inspection times must be organised to minimise the time rodents are likely to be on the rodent glue board (e.g. if rodents are known to be active during certain periods, inspection times should be arranged with this in mind

The Animal Welfare Act 2006 requires that caught animals must not display any signs of undue suffering, therefore inspections times should be as frequent as necessary to mitigate against this.

Records must be updated after all inspections.

### 4. Have a contingency plan

A contingency plan must be in place so that in the event of an emergency a second competent person can be called upon to inspect the rodent glue boards and deal with any captures or safely remove the rodent glue boards as appropriate. Where it is known rodent glue boards will not be inspected at appropriate intervals they must be taken up (even if only temporarily).

### 5. Use the correct size rodent glue board for the pest species

The size of rodent glue board must be appropriate for the target species.

### 6. Detailed records

Detailed copies of records and location plans should be available on site at all times for all rodent glue boards laid during any treatment and must be updated as necessary to ensure traceability. Copies ensure information is available should site records be lost or unavailable.

### 7. Dispatch of trapped rodents humanely

Rodents trapped on rodent glue boards must be dispatched quickly and humanely by technicians with appropriate training in methods of dispatch. Drowning is not an acceptable method of dispatch.

### 8. Protect non-target animals

Rodent glue boards must be placed in such a manner that they do not present a risk to non-target species. In the event that a non-target animal is trapped, a freeing agent (a suitable food grade oil or similar emollient) should be applied to the animal for removal. If the trapped animal is injured in such a way that release would result in unnecessary suffering, it should be killed humanely. Non-targets should only be released at their site of capture, not elsewhere, and only if they appear to be physically unharmed and their release is not prohibited by law. Ensure when using rodent glue boards that a suitable emollient is available to hand.

### 9. Remove rodent glue boards at the end of treatment

At the end of treatment all rodent glue boards must be accounted for, removed by the technician and the records endorsed accordingly.

### 10. Dispose of rodent glue boards safely

Rodent glue boards should be disposed of with care. The sticky surface must be covered to avoid the accidental trapping of any species or subsequent misuse, and the rodent glue board should be disposed of safely and discretely in accordance with legal waste requirements.

### 11. Communication with the customer

This Code of Best Practice must be provided to the customer to make them aware of the standards to which the operative is working.

The humane use of rodent glue boards is the legal responsibility of the pest controller, and cannot be delegated to untrained people. All technicians must be suitably trained and competent in their application, maintenance and ultimate disposal including the dispatch of the target species and safe removal of non-target species.

This Code of Best Practice was produced after consultation with Defra, APHA, and Natural England.

The Pest Management Alliance consists of the British Pest Control Association, the Chartered Institute of Environmental Health, and the National Pest Technicians Association.