

## **PE1671/G**

National Pest Technicians Association submission of 28 November 2017

We were concerned to hear that 'a pest control company' had apparently laid a glue board in such a position as to trap a bird. It is a pity that this individual does not seem to have been identified and prosecuted, possibly under Wildlife & Countryside Act 1981 or even the Animal Health and Welfare (Scotland) Act 2006. Such a prosecution would have helped to bring home the importance of our Code of Best Practice when using such products, to the few 'rogue' technicians that regrettably still exist in our industry.

The National Pest Technicians Association (NPTA) is a Trade Association for professional pest controllers, with over 1,000 company Members throughout the UK and Ireland. We instruct and guide our Members and represent them in consultations with both Government and Non-Governmental Organisations. They should all be aware of relevant **Code of Best Practice** and we have made significant efforts to alert our Members to the contents of this document.

We work closely with the two other key bodies in the pest control industry, the British Pest Control Association (BPCA) and the National Pest Advisory Panel (NPAP) of the Chartered Institute of Environmental Health, under the umbrella of the **Pest Management Alliance (PMA)**.

Our view, with regard to rodent glue boards is as follows:

### **Trained Professional Users:**

For the sake of Public Health, we would urge the Scottish Government to continue to allow the use of rodent glue boards by professional pest controllers, provided these are used in accordance with the **PMA 'Code of Best Practice'** on the **'Humane Use of Rodent Glue Boards'**.

As regulatory pressures increasingly restrict the availability of pest control products and evolutionary pressures increase the risk of control failures, we feel it is important to retain the use of these products. We feel that these products can be used effectively and with little risk to animal welfare, if used in accordance to existing industry standards.

Please see the attached paper which justifies this position.

### **Amateur Users:**

For the sake of Animal Welfare, we would recommend the banning of the sale of rodent glue boards to members of the Public. It is our experience that untrained individuals rarely understand the implications of their actions with these products, frequently resulting in unnecessary suffering of animals affected.

We therefore urge the Scottish Government to somehow make rodent glue boards for 'professional use only', as happens with most of the pesticides professional pest controllers use. We would be happy to offer advice as to how this might be achieved.

This point is discussed further in the attached paper.

## **The Case for Retaining Rodent Glue Boards ‘for Professional Use Only’**

If you were to ask a representative sample of professional pest controllers what they thought of the use of rodent glue boards, we would expect the majority to express concerns about their use – for animal welfare reasons – but a reluctant acceptance that in certain, specific circumstances, they are necessary.

It has long been the position of industry trainers to refer to rodent glue boards as ‘the product of last resort’. The products to use after all other options have been shown to be ineffective, hence the reluctance of many professionals to risk using them. Pest controllers are also acutely aware that their actions may be being monitored by those who are particularly concerned with animal welfare.

However, the concept of rodent glue boards being the ‘product of last resort’ was ended with the publication in March 2015 of **the ‘CRRU Code of Best Practice for Rodent Control and the Safe Use of Rodenticides’**. This document, resulting from detailed consultations with many UK Government Departments and other non-governmental organisations concerned with the use of rodenticides, put the Second Generation Anticoagulant Rodenticides (**SGARs**) firmly in the position of ‘products of last resort’, due to concerns about the environmental impacts of these chemicals.

This important document can be downloaded from the CRRU (Campaign for Responsible Rodenticide Use) website: <http://www.thinkwildlife.org> under ‘downloads’. It now forms the basis of all training in the control of rodents in the UK. Professional pest controllers now have to hold specific qualifications in rodent control in order to be able to legally purchase and use ‘professional use’ rodenticides.

In this document, non-chemical control methods, such as proofing, denial of food and water, removal of harbourage and trapping (including the use of glue boards) must be considered **before** the use of any poisons.

Nowadays, professional pest controllers are trained to use rodent glue boards according to **the ‘Pest Management Alliance – Code of Best Practice Humane Use of Rodent Glue Boards’**. This can be downloaded from the website: <http://www.pmalliance.org.uk> under ‘Codes of Practice’. The existence of this document has been advertised widely throughout the industry since it was reprinted in January 2017 following a revision prompted by the publication of the CRRU Code referred to above.

With the principal tools used to control rodents, the SGARs, coming under more and more regulatory restrictions, it is important to retain as many other control methods as possible. We would argue that rodent glue boards, though used reluctantly, do offer an effective alternative in specific circumstances – provided they are used in accordance with our Code of Best Practice, of which properly trained professional pest controllers should be aware.

In addition to this, we find that the pests we seek to control in order to preserve Public Health appear to be evolving so as to be harder to control than previously. This is particularly true of the House Mouse, which is a significant problem in the food industry.

House mice are normally inquisitive animals, which normally readily enter the tamper-resisting plastic boxes that pest controllers use to present poison bait and traps to mice in situations where human interference must be restricted.

However, in recent years, it has been noticed in many areas that there are now populations of mice which exhibit unusual behaviour, refusing to enter these boxes and thus avoiding

being controlled. We believe that this 'behavioural resistance', sometimes referred to as neophobic ('fear of new objects') behaviour, is a result of natural selection, whereby those mice that are more cautious survive to reproduce and the 'normal' inquisitive mice are less likely to do so.

This behaviour in food factories was reported recently at an international conference:  
Simmons J. and Swindells, C. (2017) "**Controlling House Mice in the Food Industry**"  
Proceedings of the Ninth International Conference on Urban Pests pp 133 – 137

A copy of this paper can be supplied on request, but the Abstract reads as follows:

"In recent years we have lost many rodenticide products and seen increased regulatory restrictions on the way in which remaining products may be used. In the food industry, client-imposed restrictions further limit usage options. House mice (*Mus domesticus*) remain a major challenge to control, even without such developments, and our experience suggests that around 10 – 20% of all food manufacturing plants in the UK experience resident mouse infestation. Using an electronic monitoring system, we have demonstrated that some of the rodent baits and traps used in 'conventional' monitoring programmes may be an extremely unreliable indicator of activity, with a high degree of behavioural resistance sometimes evident. This has long been known about, or suspected, but has rarely been quantified. The implications of this from a viewpoint of controlling mice are profound. Electronic monitoring systems are a useful tool for studying rodent behaviour in the field."

In situations where the mice exhibit strong behavioural resistance, rodent glue boards may be one of the few viable options available in their control.

The petitioners suggest some form of 'licensing' to control the use of these products. We would urge caution with this, as clients with rodent problems that require the use of glue boards require rapid action, which would not be possible if special licences had to be authorised for individual instances.

If licensing is to be considered, we would suggest the 'General Licence' approach used with the control of certain species of pest birds, in specified circumstances, using approved methods. These are reviewed and issued annually and allow 'authorised persons' to carry out work that would otherwise be illegal (under the Wildlife & Countryside Act 1981). They are not issued to individuals or particular treatments, as would be the case with a 'Special Licence', but are available for all 'authorised persons' to use. It is a system which is well understood by professional pest controllers and allows the licensing authority the opportunity to set the circumstances under which they may be applied, with annual reviews and, if deemed necessary, revised.

If the Scottish Government were to decide to restrict the sale of rodent glue boards to specified suppliers, or their use to trained professional pest controllers, we (the NPTA and/or the PMA) would be pleased to offer more detailed advice through consultation.

We would therefore argue that professional pest controllers need to retain rodent glue boards in order to continue to protect Public Health.

As they are trained how to use these rodent glue boards effectively and in a way which minimises the risk to Animal Welfare, we urge the Scottish Government to allow their continued use in the hands of trained professionals.