

PE1671/V

Pest Management Alliance submission of 20 August 2020

We, the Pest Management Alliance, comprising of the Chartered Institute of Environmental Health, National Pest Technicians Association and British Pest Control Association, do not accept that we do not understand the petitioner's concerns. We have amended the current code of practice to include many of the issues highlighted, including recognising that these products have the ability to cause suffering. However, as highlighted when we visited the Scottish Parliament, **the control of rodents is a critical component in protecting public health, due to their ability to carry and transmit pathogenic microorganisms and therefore disease.**

There is also increasing evidence that house mice in particular, have altered behaviour, whereby they actively avoid bait stations and have an intolerance to the cereal product base of many anticoagulant rodenticides. Whilst it is true that the pest control industry is not regulated, we are very good at self-regulating and the voluntary production of the glue board and other codes of practice that have been largely followed over the last 10 years is testament to our commitment to reduce animal suffering as much as is practical. Industry self-regulation can also be evidenced when considering rodenticide use. It was recognised that rodenticides have the potential to be harmful to the environment and to non-target species. Therefore, the pest control industry developed a stewardship scheme that is accepted by the industry and has representation across all sectors including manufacturing, suppliers etc.

We do not accept that we have not studied the State of Government, Victoria, Australia proposal and do not believe that this best protects the interests of protecting public health. Similarly, the New Zealand model of severely restricting use of these products can only have a negative effect on public health by limiting the control options available to professional pest controllers.

The proposed use of such products is clearly set out in the code of practice, in that their use should only be considered if all other control options have failed or if there is an imminent risk to public health, for example, a hospital ward, operating theatre or school kitchens, where vulnerable people will undoubtedly be present.

We believe that the pest control industry is extremely good at self-regulation and have shown this over many years and neither Association will accept members that are not part of a Continuous Professional Development Scheme. Any deviation from a code of practice is fully investigated. We do, however, support a ban on the sale of these products for amateur / non-professional use as they have the potential for misuse and cause animal suffering.

To conclude, we feel that we have listened to and addressed the concerns of the petitioners and have revised the current code of practice to reflect this. We must stress however, that an outright ban in our view can only be to the severe detriment of public health.