



The responses to the NPAP survey of 12 local authorities on environmental risk mitigation measures of SGARs

October 2012

A questionnaire was circulated to 12 large local authorities in the North-East, the North-West, Yorkshire, London, Central and South-West England.

The questions related to services they provide, opinions on the proposed 5 metre restriction, how this restriction could affect their ability to meet their legal obligations under the Prevention of Damage by Pests Act 1949 and overall comments regarding the proposed limits.

Question 1: What percentage of domestic and other rat treatments require you to bait further than 5 metres from buildings?

The survey reports that there is a wide range in the number of rat control treatments within local authorities which take place beyond 5 metres of a building. The lowest figure is 5% and the highest 60%. Further analysis is currently being carried out to assess how many treatments beyond 5 metres would be involved and CIEH would be happy to share this information with HSE.

However, one Northern city stated that it conducts approximately 3,500 rat treatments each year with 20-25% of these being 5 metres beyond a building. If the restriction of 5 metres is agreed 700-875 treatments in this authority would not take place resulting in these rodent populations going untreated. Should each of the authorities surveyed have similar outdoor treatment numbers, 8,400 – 10,500 rat infestations would go untreated each year. If this was extrapolated to all UK authorities, the number of annual rat infestations that could not be treated with SGARs could exceed 100,000.

CIEH views this with great concern since the current trend away from pro-active local authority pest control to the more re-active out-sourced control is already likely to reduce the amount of rat control away from buildings. This was the theme of the recent CIEH publication “The Perfect Storm” a copy of which is attached.

Question 2: What would be the impact of this restriction on your ability to treat rat infestations along railway lines, road verges, in and on waste land, around railway stations and other such areas?

Respondents explained their individual circumstances when replying to this question, providing examples of how the restriction would or would not affect them and their communities.

Although some of the respondents advised that such areas are managed by third parties (Network rail) they can still see the potential of how water courses, open land and current regeneration developments for which they are responsible, would be affected greatly from such a restriction.

The importance of managing rat populations is strongly recognised in the responses, with many

advising that such restrictions mean that rodent populations away from buildings will be uncontrolled, allowing infestations to grow, thus causing and not resolving the problem of rats and their potential to spread disease.

Question 3: What would the impact of this restriction be on your ability, or the ability of your parks and gardens departments, to treat parks, gardens, and children play areas, schools and other such areas against rats?

The survey showed that the impact of the proposed 5 metre restriction is causing concern among local authorities. They fear that the limitations would increase the rat levels and make their task more difficult or even result in the closure of public areas.

Responders also commented that the risk of ineffective rat treatments would result in the need for re-treatment. They also expressed concern about the increased costs if they had to use traps and visit sites more often. Both would be unhelpful when “cash strapped” local authorities are already faced with the burden of budget cuts.

Question 4: How would this 5 metre restriction affect your ability to fulfil your obligations under the Prevention of Damage by Pests Act (PDPA) 1949?

The responding local authorities generally expressed concern that the likely outcome of the 5 metre restrictions would result in their failure to meet their legal obligations outlined under the PDPA 1949. One authority did welcome the fact that the opportunity to use resistance-breaking rodenticides outdoors was an advantage.

However, the remaining authorities advised, their ability to fulfil the PDPA 1949 requirements would be proven inefficient and ineffective when dealing with resistance in outdoor populations beyond the proposed 5 metre threshold.

As resistance to first generation rodenticides has been identified in some areas of the UK, many of the respondents believe the distance restrictions for second generation rodenticides would seriously challenge their ability to fulfil the expectations of the Act. One authority stated, “this restriction will make it almost impossible to comply with our duties under PDPA 1949”.

Question 5: We would be grateful if you could let us have your views on these questions and any other comments that you might have on this 5 metre restriction

Although responding authorities understand the reasons why the HSE feel it desirable to impose a distance restriction owing to the potential for secondary poisoning of non target species, they feel that a balance is needed which puts human health and the health of the public before the potential of secondary poisoning of non target species.

Specific comments were:

“We can see the point HSE is making but feel professional operators should be allowed to use SGAR’s beyond this distance, using best baiting practice. This would bring the majority of non-target species poisoning down to secondary poisoning (sic). The balance of the impact should be weighted in favour of protecting human health and the prevention of damage to property and foodstuffs before the needs of the non-target species”.

“Personally I think we should always use the least toxic bait inside or out unless there are good reasons (i.e. resistance) that we need to use a more toxic active. If we are given permission to use the more toxic versions it should be clearly documented why and should only be used by trained/qualified technicians and not by domestic users. I know this is hard to police but there is nothing stopping a member of the public buying brodifacoum and using it outside at the moment”.

“I can see that if the ruling does come into play then there will be an increase in DIY treatments by residents and having seen some of those that have taken place, such as bait scattered over the grass area of a garden or even placed on bird tables (as the rats were feeding on the bird food) I can see that this would have a more detrimental effect on non-target animals than professionally placed baits”.

“In summary the proposal of a 5 metre rule is not practicable in London. We need swift and effective control. This rule would prevent this and leave infestations active. As the population of rats increases we see their spread and their attempts to access food businesses etc. We must be able to carry out rat treatments at all locations we are responsible for. Most rat infestations we deal with are located 5 metres away from buildings, the rats then forage in the populated areas at the bins of restaurants, bars etc. We need to tackle these at source”.

“We have many high profile areas used by the public where rats cannot be effectively controlled. We welcome the HSE’s preferred option of using SGAR’s in and around buildings but are opposed to the limitations of distance. There must be a swing in the balance of protecting non-target species to the nth degree, to a position of putting human health and well-being as the overwhelming priority”.

“It can be seen that the driving issues behind the HSE’s proposals as outlined in their Stakeholder Engagement Document are of rodenticide resistance and the secondary poisoning of wildlife. The misuse of perimeter baiting in open areas and permanent

baiting has significantly contributed to the emergence of different strains of rodenticide resistance and the discovery of rodenticides in nearly all UK wild animals”.

“Looking at the wider picture ‘in and around buildings’ is a good starting point in that one should be able to control rat populations within a 50 - 100 m radius of buildings and it prevents continued misuse of rodenticides in open areas”.

“It is our opinion that the introduction of this restriction will have a severely detrimental effect on our ability to control infestations of rats out of doors. The areas of permitted use are governed by the definition of what constitutes ‘a building’. Does a garden-shed, for example qualify? If so this would certainly help ease the problem of baiting in and around domestic gardens. It might be that a more permanent brick built structure would be the accepted definition of a building so this certainly needs clarification”.

“A 5 metre restriction will have serious implications for public health. We will be unable to control potential reservoirs of infestation on waste land, landfill sites, allotments, parks, gardens, children’s play areas and other public spaces. Uncontrolled infestation on waste land etc. will result in rodent migration to domestic and / or commercial premises”.

“It is already a great frustration to professionals working within the Pest Management industry, that whilst funding and research have been provided to ensure that resistance-breaking active ingredients have been developed, it is still not possible to use them in a number of circumstances, meaning that infestations remain uncontrolled for longer periods and as a direct consequence the risk to public health is allowed to continue.”

“The relaxation of restrictions and the permitted extended use of such products as brodifacoum, difethialone, and flocoumafen is something that we should warmly welcome. If these products are to be used by experienced and trained professionals working within strict guidelines which ensure that all necessary risk-mitigation measures have been implemented, then this would be a significant step forward in bringing about a safe and speedy resolution of a rat infestation. Let’s concentrate on the matter of integrated pest management and let’s worry less about whether we are 4.5 or 5.5 metres from a building when we determine how we deal with a very significant public health problem”.



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