UK Second-generation Anticoagulant Rodenticides (SGARs) Stewardship Regime Proposals
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The Campaign for Responsible Rodenticide Use – CRRU  
www.thinkwildlife.org
It is obvious to us all that the best way to deal with rodent infestations is not to have them in the first place. This is achieved by denying them food, water and places to live and breed. However, in spite of our best efforts, rodents often become established and we need to remove them, frequently by employing rodenticides. Because of the expansion across the UK of rat and mouse infestations that are resistant to many earlier rodenticides, this is increasingly done by the use of the advanced and more potent second-generation anticoagulants (SGARs).

It has become apparent in recent times that the way in which SGARs are habitually used in the UK has resulted in the widespread exposure of wildlife to these active substances. The Health and Safety Executive (HSE), the government body responsible for the regulation of rodenticides, held a consultation process on the uses of SGARs in the UK and received comment from a wide range of agencies, organisations, businesses and individuals. As a result of this consultation, and with a desire to reduce wildlife exposure to SGARs, HSE has laid down a requirement that a comprehensive scheme of stewardship should be introduced across all SGAR user groups. The principles of the scheme, which has come to be called the UK SGAR Stewardship Regime, were set out by HSE as follows:


In June 2013, HSE asked the Campaign for Responsible Rodenticide Use (CRRU) to co-ordinate the development and implementation of the Stewardship Regime. CRRU agreed to do this and has set about the task with energy and speed. A structure of four Sector Groups was established: 1) Agricultural Industries, 2) Gamekeeping, 3) Professional Pest Control and Local Authorities and 4) Suppliers. Each of these Sector Groups comprises agencies, organisations and businesses that represent or otherwise can directly influence SGAR users in the relevant sector.

Under the co-ordination and guidance of CRRU, each Sector Group has developed a set of stewardship proposals that may be put into practice to promote responsible use of SGARs by those that the Group represents. These proposals are set out in the four documents that follow.

The proposals will be put, in a meeting to be held in York on 4th March 2014, to relevant government departments, including HSE, Department of Health and the Department for Environment, Food and Rural Affairs. If the proposals, and the various processes described for monitoring the operation and impacts of the Stewardship Regime, are considered appropriate by government agencies, implementation of the Regime will begin immediately. HSE will then make well-founded decisions for the future about who is permitted to use SGARs in the UK, where they can be used and how they should be applied responsibly and effectively.

Dr Alan Buckle
Visiting Research Fellow, University of Reading
Chairman, Campaign for Responsible Rodenticide Use
1. Proposals for the Stewardship of the Second-generation Anticoagulant Rodenticides (SGARs) in the UK from the Agricultural Sector Group

Introduction
These proposals have been developed by the Agriculture Sector Group, comprising the Animal Health Distributors Association (AHDA), Agriculture and Horticulture Development Board (AHDB), Agricultural Industries Confederation (AIC), BASIS (Registration) Ltd, British Egg Industry Council, British Pig Association, British Poultry Council, Country Land and Business Association (CLA), Farmers Union of Wales, LANTRA, National Farmers' Union (NFU), National Pig Association (NPA) and Red Tractor Assurance.

This group aims to represent the UK’s 463,700 agricultural workers and £95 billion Agri-food industry and would be open to other relevant stakeholders in the agricultural sector.

These proposals describe the way in which the Agriculture Sector could implement Second Generation Anticoagulant Rodenticide (SGAR) Stewardship.

Background
Rodents present a significant risk to human health; animal health and welfare; food hygiene; structural integrity and safety1. The zoonotic diseases and parasites that they harbour are transmissible to humans, companion animals and farm livestock. Internationally, Schistosomiasis alone is estimated to infect as many as 200 million people, singularly justifying their internationally accepted “significant public health pest”2 status from the World Health Organisation.

Rodents are known vectors of a range of infectious diseases within the UK such as Salmonella, Leptospirosis (Weil’s Disease); Lymes Disease and Hantavirus, amongst others. The pestilent impact on the food and feedstuffs that rodents consume and spoil is far reaching - 130 million people could be fed each year on the food destroyed by rats. Their damaging impact on buildings and their internal infrastructure are widely recognised3 and it is believed that rats are responsible for 50% of farm fires in the UK at a cost of £28 million/year due to gnawing electric cables. As a result, they must be controlled on economic, health and social grounds.

However, there is evidence to suggest that rodenticide use can have an unintended impact on non-target species. There are two main areas of concern that research has highlighted with regard to the use of SGARs and their wider impact on wildlife.

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1 “Rodents can carry diseases that can harm people, cause damage to buildings and spoil foodstuffs, and rodenticides are one of the methods of controlling rodents.” http://www.hse.gov.uk/biocides/eu-bpr/rodenticides.htm


Firstly, post-mortems on the remains of some birds indicate that death may have been as a result of the irresponsible use of rodenticides.\(^4\)

Secondly, many species of wildlife, and a notably high proportion of some wildlife species, such as barn owls, red kites, buzzards and kestrels, have been found to carry low-level residues of some of the commonly-used rodenticides in their bodies. However, it is uncertain whether these usually very low-level residues have any adverse effects, either on the individual animals that carry them or on wildlife populations as a whole.

To address this, the Campaign for Responsible Rodenticide Use (CRRU) has been in place since 2005 and is made up of the nine major companies who produce rodenticide products in the UK. Its aim has been to encourage responsible use of rodenticides to minimise the risks to non-target species. CRRU has developed a resource base and a code for best practice. However, the messages that CRRU has developed have failed to resonate with practitioners due to lack of partnership with key industry stakeholders.

As a result of failure at EU level to agree risk-mitigation measures for SGARs, the decision has been delogated to the competent authority in Member States to put into place measures at Member State level. The Health and Safety Executive (HSE), as the competent authority, invited a group of representative industries, coordinated through the Campaign for Responsible Rodenticide Use (CRRU), to develop the detail of a SGAR stewardship scheme. As a result of these meetings, the following structure was agreed.

\(^4\) The scope of this is monitored and reported through a variety of schemes. One of these is the Wildlife Incident Investigation Scheme (WIIS) run by the Chemicals Regulation Directorate (CRD) and Science and Advice for Scottish Agriculture (SASA) in the UK. In Ireland, various wildlife conservation agencies such as BirdWatch Ireland and The Golden Eagle Trust monitor direct impacts of rodenticides on wildlife, especially birds of prey.
Agriculture and Rodenticides

Agriculture directly employs around 463,700 people5 and if you consider the wider financial impact of the value of produce to the Agri-food sector as a whole, contributes £95 billion to the UK’s Gross Value Added (GVA)6 (7.3% of the national GVA). This multi-billion pound industry is hugely important to the UK economy but is commercially dependent upon the control of rodent populations, given the potential for the introduction of disease into the human food chain (notwithstanding the impact of their presence on employee health, farm and companion animal health and welfare and damage to buildings and their infrastructure on-farm). Whilst not every farm enterprise has a dedicated rodent control as part of their job, it is reasonable to assert that almost all 222,000 registered commercial farm holdings7 will have to undertake measures to control rodents. Whilst some may choose to contract out this work to external pest controllers, the remainder will undertake the work in-house and will have at least one individual employee who manages this role.

The control of rodent populations on agricultural holdings is undertaken both “in and around buildings” and in “open areas”. Their use in these different areas is dependent upon farm enterprise and structure. It is overly-simplistic to assume that all farmers of a certain commodity (e.g. laying hens) would use rodenticides in the same way due to the wide differentiation in rearing systems. For example, both caged hens and free-range hens must be protected from rodents and the diseases that they spread. Whilst every effort can be made to exclude rodents from both of these types of system, their intelligence, persistence, gnawing capacity and small size means that incursion is inevitable, particularly on outdoor, free-range systems, where baiting outside of buildings is necessary. As such, action must be taken to control rodent numbers and minimise the risk that they pose. This is the case across all commodities.

The emergence of resistance amongst rats to First Generation Anticoagulant Rodenticides is well documented8 and the subsequent decline in the number of effective products available to control rodent populations is worrying.

Farms now have access to five Second Generation Anticoagulant Rodenticides (SGARs) which were first introduced in the 1970s and are considered to be of key importance in the effective control of vermin. Given the lack of effective alternatives, they are now essential tools for tackling rodent infestations. However, the diminishing availability of SGARs registered and labelled for use away from buildings hampers some sectors’ ability to control rodents: not least the free-range/outdoor-reared pig, poultry, beef and sheep sectors. An inability to use these products in open areas would impact their ability to control rats in and around the animals’ feed and housing which would be disastrous to these sectors’ viability. This is an issue of significant concern to the industry.

However, following meetings with CRRU, the Agriculture Group recognises the need to increase awareness and support for best practice stewardship measures to encourage responsible rodenticide use in ways that minimise the exposure to wildlife and other non-target animals without jeopardising public health and the effective control of these pests. In order to circumvent the impending removal of SGARs from key agricultural sectors, there is an immediate need for increased emphasis on SGAR Stewardship across the industry.

It is important to note that this Group also understands that effective Stewardship will help ensure these products’ long-term efficacy with regards to the development of rodenticide resistance and that, as a result, this scheme will have multiple and far-reaching impacts.

The Agriculture Group proposes the following Agricultural SGAR Stewardship Scheme which has tried to find a balance between the public health, environmental and commercial concerns by improving the responsibility with which rodenticides are used on farm.

Key aspects of the proposed SGAR stewardship scheme

Aim:
The aim of this proposed scheme is to ensure that effective rodent control can be carried out by all users, while ensuring that the exposure of all non-target animals, including wildlife, is kept to an absolute minimum, by engendering a culture of responsible and sustainable use within the agricultural industry.

Current context:
It is the belief of the Agriculture Group that, whilst rodenticide users will be aware of the impact that these products would have on children or pets if directly ingested, it is unlikely that the majority would be aware of the unintended impact on wider non-target species, such as birds of prey, as this has not been widely publicised in agricultural publications.

Engagement within the agricultural industry requires:

a An understanding of the problem (and awareness of its existence);
b An appreciation of the consequences if an adequate solution is not found;
c Guidance on best practice for individuals to follow; and,
d Training resources to encourage continual improvement in practice.

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Instigating change in Agriculture:
Agriculture has a long track record of engendering successful culture change without the need to introduce new regulation, in line with UK government’s “principles of better regulation” ideals (Proportionality; Accountability; Consistency; Transparency; and Targeting). It has achieved this for a range of topics through a variety of means, but the introduction of voluntary schemes is by far the most prolific and successful (for example, the Voluntary Initiative (VI); Campaign for the Farmed Environment (CFE); National Register of Sprayer Operators (NRoSO); Say No To Drift; and more recently, the Farm Safety Partnership).

The success and uptake that these types of schemes can have in the agricultural sector is demonstrated by the Voluntary Initiative (VI). The VI’s main ongoing aim is to encourage best practice in the responsible use of pesticides and was identified in the Defra National Action Plan for Pesticides (2013) as the key delivery method for achieving the government plans for the Sustainable Use Directive. In this same document Defra identified the standard of stewardship of pesticides in the agricultural sector as ‘very high.’ The VI has worked for 12 years on a voluntary basis with approximately 21,000 sprayer operators registered on NRoSO and NSTS tested spray over 90% of all crops applied with pesticides.

The Agriculture Group believes that, given this precedent for success through Voluntary Stewardship, a similar scheme for SGARS would be equally successful and engender best practice across the board. In order for the Scheme to have impact and uptake, there must be guidance on what responsible rodenticide use would look like in an agricultural context. This would need to be shared in an industry-wide publicity and awareness-raising campaign to draw attention to the problem and the practical solutions that have been developed. There is already buy-in from all members of the Agriculture Group to assist through our far-reaching communication channels ensuring joined-up messaging across industry. In addition, we have good working relationships with the trade press who will be essential in the campaign’s outreach.

The CRRU Code
The overall purpose of the code is to ensure that effective rodent control can be carried out by all users, while ensuring that the exposure of all non-target animals, including wildlife, is kept to an absolute minimum.

1. Always have a planned approach
2. Always record quantity of bait used and where it is placed
3. Always use enough baiting points
4. Always collect and dispose of rodent bodies
5. Never leave bait exposed to non-target animals and birds
6. Never fail to inspect bait regularly
7. Never leave bait down at the end of the treatment

Adopting a simple and consistent message:
The CRRU Code’s simple, definitive, 7-step guide to using rodenticides sets the main principles for responsible rodenticide use.

The Agriculture Group proposes to use these principles and broadly replicate them for the agriculture sector. These would be publicised widely by individual Agriculture Group member organisations’ communications channels, CFE local co-ordinators, trade press, agricultural shows and social media.

Strengths of the current system:
Rodenticide use is a commonplace and integral part of farm management. As such, there are already a number of schemes in place to inform farm employees on best practice usage in the agricultural sector.

Firstly, there are a number of guidance documents in place. These primarily cover usage “in and around buildings” and the Agriculture Group feels that they adequately represent the best-practice messages of the CRRU Code.

For obvious food hygiene reasons, all farms that exhibit evidence of rodent activity risk losing the ability to trade with their designated buyers until the infestation is shown to be controlled. This can be evidenced by the categorisation of the Red Tractor Vermin Control Standard (VC.1) as K (Key Standard) (meaning that a major non-conformance against this standard will result in suspension from the Red Tractor Scheme) and as a ‘critical non-conformance’ in the Lion Code of Practice for the egg industry. However, this is by no means limited to farm-assured products and as a professional industry providing food for human consumption on both a domestic and international market, there is no tolerance for unmanaged vermin populations on a farm. As such, schemes that will assist in the responsible eradication of rodents would be welcomed and it is clear that there is a high level of incentive for farmers to comply.

Rodenticide use is already an integral part of all Red Tractor Assurance Schemes covering over 78,000 farmers and growers. In England alone, there are approximately 2,500 pigs members; 2,000 poultry members; 2,500 fresh produce members; 18,000 combinable crops members; 25,000 beef and sheep members; and 11,500 dairy members working to Red Tractor standards. The existing standards can be found in the appendices specified below.

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9 Defra: Code of Practice for the Prevention and Control of Rat Infestation at Poultry Farms. HGCA: Rodent Control in Agriculture. HSE: Safe Use of Rodenticides on Farm Holdings.

10 Red Tractor Assurance has vermin control standards that span ‘Beef and sheep’, ‘Dairy’, ‘Poultry’ and ‘Pigs’ which can be found in Appendix 1. Red Tractor Assurance has vermin control standards that span ‘Combinable Crops and Sugar Beet’ which can be found in Appendix 2. Red Tractor Assurance has vermin control standards that span ‘Fresh Produce’ which can be found in Appendix 3.
Red Tractor Assurance has agreed to take the CRRU Code to their committees for consideration and propose strengthening its vermin control standards to focus more on ‘responsible use’ of rodenticides during their review period. This process is already in motion and, as part of their 3 yearly review of standards, Red Tractor Assurance has already taken some of the CRRU Code points into consideration and included them in their consultation which closed at the end of January 2014. The industry is committed to working together to help these standards better reflect the scheme’s responsible use initiative going forward.

HSE requires users of professional biocides to be sufficiently trained and competent in their use. Across the agricultural sector, awareness of environmental risk is very high as a result of a range of training undertaken by users of professional plant protection products. It is already a legal requirement that all users of professional plant products have undertaken training in their use. In addition, users born after 31st December 1964 are required to hold a certificate of competence. From 26th November 2015, all users of professional plant protection products will be required to hold a recognised certificate of competence. The syllabus for user certification covers amongst other issues, responsible use of plant protection products, including modules on environmental awareness which has the most comparable principles relating to rodenticides. Many users will have also undertaken additional CPD training through NRoSO.

We have a very robust and interlinking communications network within agriculture that has been mobilised for numerous far-reaching and successful campaigns in recent years (e.g. SOS Dairy). This network can be utilised for the issue of responsible rodenticide use.

Areas to be targeted:

As previously intimated, the current recognition of the risks associated with the use of SGARs as a result of secondary contamination of non-target species is limited.

As such, responsible use of rodenticides must be adequately described for practical reference for farmers, both “in and around buildings” and in “open areas”.

There is currently no code of practice appropriate to the agricultural industry which describes best practice for usage in “open areas”. To enable farmers and growers to comply with best practice, this needs to be clearly defined. It has been noted that the principles would have much in common with the outdoor use of SGARs by Gamekeepers. To ensure that comprehensive guidance is available for every manner of SGAR usage in the agricultural industry, a code of practice will be developed in line with the “Rat Control and Game Management” developed by CRRU. This issue will be explored in more detail under Point 5.c.

Finally, whilst there are already generic rodent-control courses available through Lantra, until recently, none specifically target the additional challenges of “open area” use of rodenticides. BPEX has recently developed a Lantra-accredited course for responsible rodenticide use in the pig sector which covers both indoor and outdoor use. There has been no requirement for farmers to engage with this course, yet the uptake has been high, proving agriculture’s willingness to engage with this subject. This course could be adapted to service other sectors.

It is the Agriculture Group’s proposal that a module on rodenticide use in open spaces will be developed for farmers to complement their understanding of the advice found in our guidance. This module could be both integrated into existing courses and developed for sector-specific programmes (such as the BPEX course).

Ensuring implementation by all parties:

Agriculture Group stakeholders will sign up to a charter which demonstrates a cross-industry commitment to progressing and developing the Agricultural Rodenticide Stewardship Scheme.

Elements of SGAR Stewardship – HSE Framework

In line with the HSE’s framework for the proposals for SGAR Stewardship published on 9th August 2013, please find below the Agriculture Group’s submission.

a. Product Labelling:

The Agriculture Group suggests that all SGAR labels are identified by colour coding, either via a coloured ‘dot’ on the label or the whole label being printed on a given colour. This would make all SGAR products more distinguishable from other rodenticides and assist in both their identification and the development of on-farm resistance strategy plans.

The Group feels that the addition of further text to labels to explain SGAR stewardship would be an ineffective means of promoting responsible use of rodenticides as labels are already crowded due to statutory inclusions from both the EU and individual company requirements.

The Group also notes that inconsistency between product labels (e.g. placement of information on the label) is a potentially confusing factor for the industry and appeals to the Supplier Group for labelling consistency.

b. Point of sale conditions (Ensuring that only professionals have access to professional products):

The Agriculture Group recognises that the point of sale is an essential opportunity for information to be
given to purchasers which highlights the issue and provides a solution. Hard copies of the 7-step CRRU Code Checklists (see point c. below), referencing the Approved Code(s) of Practice, should be available at the point of sale for all purchasers.

The Agriculture Group feels that imposing further conditions at point of sale, for example requiring proof of certification of the purchaser, is unnecessary. This issue was previously explored when the Regulation for placing plant protection products on the market (1107/2009) was being developed. The view of the supply chain for pesticides (including suppliers) was that proof of purchaser certification did not mean that the user was certified. In addition, the requirement to present a certificate at the time of sale would increase administration for retailers and inconvenience purchasers. Not all rodenticides bought for on-farm use are purchased by the farmers directly – this process often involves farm office staff, contractors or third parties such as buying groups, frequently remotely.

To assist with product differentiation so that non-professional users do not accidentally select a professional use product, professional and non-professional products could be located in separate areas of the display.

Online retailing was identified as a potential area whereby “amateur users” could access professional-only rodenticides more easily. In a similar approach to that proposed for shop-based retail, online retail should also be encouraged to segregate amateur and professional-only products, clearly stating that certain products are for professional use only and provide links to the relevant Approved Code(s) of Practice.

c. Guidance/codes of practice:

It has been identified that a code of practice needs to be developed for ‘open areas’ for agriculture. The CRRU-developed “Rat Control and Game Management” guidance document has been selected as a template for an agricultural equivalent. It has been agreed that CRRU will be involved in the development of a similar document for agriculture which will focus on agriculture-specific examples for practical context. Similar to the gamekeeper’s document, it will aim to encourage a stepwise approach to rodent control, requiring that all measures are taken to prevent vermin infestation initially. It would then promote timely control, using a range of trapping, shooting, gassing and terriers where appropriate. Rodenticides would be used as a last resort (with First Generation compounds being preferred in areas where resistance was not an issue).

AHDB bodies have already started developing guides to rodent control within their individual sectors for “in and around buildings”. For example, the HGCA has already produced a guide which refers to the CRRU Code. BPEX have developed a Lantra-accredited training course for pig farmers which has been tailored to meet the demands of both indoor and outdoor production. A wealth of material, all referencing the CRRU code has been developed alongside this to help engender responsible usage across the pig industry. Industry-specific messages are important, but consistency across sectors is considered paramount. As such, the Agriculture Group encourages sector groups to communicate to ensure messages are consistent and timely.

The Agriculture Group proposes that the CRRU Code messages should be developed into a concise pocket-card sized publication for distribution with SGAR products. This single, consistent message succinctly describes sustainable use of rodenticides and could act as a checklist for SGAR application.

d. Other accreditation/licencing schemes:

Existing training and certification (by November 2015) is a legal requirement for users of Plant Protection Products. It is also a requirement of assurance schemes and would sufficiently cover biocide uses. In addition NRoSO training and online training developed by CRRU is available to encourage CPD.

Effective pest control is a key requirement of a range of assurance codes, which are recognised for raising standards in the agricultural industry. Some examples include the Lion Code of Practice\textsuperscript{11} (who recognise the role that mice and rats can play in transmitting Salmonella and the need for their effective control); Freedom Foods (which requires a written ‘pest control policy’); the IPPC Directive for large-scale pig and poultry farmers; and Red Tractor Farm Assurance (for whom vermin control is already an integral part of all Red Tractor Assurance Standards, covering 78,000 farmers and growers).

Red Tractor reviews its standards on a three yearly basis. Any proposed changes are consulted on and all consultation responses are taken to the Red Tractor sector Technical Committees for consideration and agreement. The most recent of these consultations included some changes to the Vermin Control standards, strengthening them and making them more prescriptive to focus on ‘responsible use’ of rodenticides, in line with the CRRU Code.

\textsuperscript{11} Lion Code of Practice has vermin control requirements that span breeder pullet rearing farms, breeder laying farms, hatcheries, pullet rearing, farms, laying farms, packing centres, feed mills, an example of which can be found in Appendix 4
The draft versions of the Red Tractor Vermin Control Standards which went to consultation were as follows:

### BEEF AND LAMB STANDARDS

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<thead>
<tr>
<th>VC.1 K</th>
<th>Systems must be in place to control vermin in areas where livestock and feed are kept</th>
<th>• System managed in house by a demonstrably competent person or by external contractor&lt;br&gt;• Evidence that control is effective and being managed e.g. no evidence of contamination by vermin</th>
<th>Written agreement with external contractor</th>
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<tr>
<td>VC.2 Revised</td>
<td>Bait is used responsibly</td>
<td>• Where baits are used, a bait plan is in evidence&lt;br&gt;• Plan includes map/location of bait points, bait used and bait point inspection and replenishment dates&lt;br&gt;• Safe positioning of baits; non-target animals do not have access and there is no risk of contamination</td>
<td>Bait plan</td>
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Where to find help: [Campaign for Responsible Rodenticide Use](http://www.thinkwildlife.org/cmu-code/)

### DAIRY STANDARDS

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<tr>
<th>VC.1 K</th>
<th>Systems must be in place to control vermin in areas where livestock and feed are kept</th>
<th>• System managed in house by a demonstrably competent person or by external contractor&lt;br&gt;• Evidence that control is effective and being managed e.g. no evidence of contamination by vermin</th>
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<tr>
<td>VC.1.1 Upgraded</td>
<td>Systems must be in place to control vermin in milk production areas</td>
<td>In the dairy:&lt;br&gt;• Doors are kept closed&lt;br&gt;• Where insects are present measures such as fly screens, food-safe fly sprays, fly strips and/or functioning insecticides are used. Dead insects are removed regularly&lt;br&gt;• Vermin access points are eliminated (e.g. gaps around doors, drains) in the parlour:&lt;br&gt;• Feed hoppers are kept clean and covered&lt;br&gt;• Birds do not nest/roost in the parlour&lt;br&gt;• Drains are covered, no gaps in ceilings, holes round pipelines are blocked&lt;br&gt;• Where insects are present measures are in place to control them</td>
<td></td>
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<tr>
<td>VC.2 Revised</td>
<td>Bait must be used responsibly</td>
<td>• Where baits are used, a bait plan is in evidence&lt;br&gt;• Plan includes map/location of bait points, bait used and bait point inspection and replenishment dates&lt;br&gt;• Safe positioning of baits; non-target animals do not have access and there is no risk of contamination</td>
<td>Bait plan</td>
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Where to find help: [Campaign for Responsible Rodenticide Use](http://www.thinkwildlife.org/cmu-code/)

### FRESH PRODUCE STANDARDS

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<tr>
<th>VC.1 K</th>
<th>Systems must be in place to control vermin in all operational areas, including packing and storage areas</th>
<th>• System managed in house by a demonstrably competent person or by external contractor&lt;br&gt;• Evidence that systems are effective and being managed&lt;br&gt;• System prevents bird, rodent and domestic animal entry to all long-term storage&lt;br&gt;• Vermin entry points (e.g. gutters, eaves, doors, loading pipes, etc.) are secured</th>
<th>Records of bait checks&lt;br&gt;Written agreement with external contractor</th>
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<tbody>
<tr>
<td>VC.2 Revised</td>
<td>Bait must be used responsibly</td>
<td>• Where baits are used bait plan is in evidence&lt;br&gt;• Plan includes map/location of bait points, bait used, bait point inspection dates and replenishment dates&lt;br&gt;• Safe positioning of baits; non-target animals do not have access and there is no risk of contamination to watercourses&lt;br&gt;• No contamination of grain with bait and baiting stations kept well away from stored grain</td>
<td>Bait plan to be kept for 2 years</td>
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<tr>
<td>VC.3</td>
<td>Buildings used for packing and storing product must be maintained in a manner that prevents the ingress of pests</td>
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<td>VC.4</td>
<td>Domestic animals must not be allowed in any operational areas, including packing and storage areas</td>
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Where to find help: [Campaign for Responsible Rodenticide Use](http://www.thinkwildlife.org/cmu-code/)
PIG STANDARDS

<table>
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<tr>
<th>VC.1 K</th>
<th>Systems must be in place to control vermin at all storage sites, including temporary storage</th>
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<tr>
<td></td>
<td>• System managed by a demonstrably competent person or by external contractor</td>
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<td>• Evidence that control is effective and being managed e.g. there is no evidence of contamination by vermin</td>
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<td>• A system that prevents bird, rodent and domestic animal (e.g. cats and dogs) entry to all long-term storage</td>
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<td>• Vermin entry points (e.g. gutters, sashes, doors, loading pipes, etc.) are secured</td>
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<td>Written agreement with external contractor</td>
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VC.2 Revised

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<th>Bait must be used responsibly</th>
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<tr>
<td>Where baits are used a bait plan is in evidence</td>
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<tr>
<td>Plan includes map/location of bait points, bait used, bait point inspection and replenishment dates</td>
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<tr>
<td>Safe positioning of bait non-target animals do not have access and there is no risk of contamination</td>
</tr>
<tr>
<td>Bait plan</td>
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Where to find help


COMBINEABLE CROPS AND SUGAR BEET STANDARDS

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<th>VC.1 K</th>
<th>Systems must be in place to control vermin at all storage sites, including temporary storage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• System managed by a demonstrably competent person or by external contractor</td>
</tr>
<tr>
<td></td>
<td>• Evidence that control is effective and being managed e.g. there is no evidence of contamination by vermin</td>
</tr>
<tr>
<td></td>
<td>• A system that prevents bird, rodent and domestic animal (e.g. cats and dogs) entry to all long-term storage</td>
</tr>
<tr>
<td></td>
<td>• Vermin entry points (e.g. gutters, sashes, doors, loading pipes, etc.) are secured</td>
</tr>
<tr>
<td></td>
<td>Written agreement with external contractor</td>
</tr>
</tbody>
</table>

VC.2 Revised

<table>
<thead>
<tr>
<th>Bait must be used responsibly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where baits are used a bait plan is in evidence</td>
</tr>
<tr>
<td>Plan includes map/location of bait points, bait used, bait point inspection and replenishment dates</td>
</tr>
<tr>
<td>Safe positioning of bait non-target animals do not have access and there is no risk of contamination</td>
</tr>
<tr>
<td>Bait plan</td>
</tr>
</tbody>
</table>

VC.3

<table>
<thead>
<tr>
<th>Insect traps in stored grain must be used as a means of monitoring insect activity and records must be kept of dates of checks, any insect activity and subsequent follow up action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Records of insect trap monitoring</td>
</tr>
</tbody>
</table>

Where to find help


CHICKEN STANDARDS (includes breeder layers; breeder replacements; broilers and poussin; free range; and hatchery)

<table>
<thead>
<tr>
<th>VC.1 K</th>
<th>Systems must be in place to control vermin in areas where birds and feed are kept</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• System managed by a demonstrably competent person or by external contractor</td>
</tr>
<tr>
<td></td>
<td>• Evidence that control is effective and being managed e.g. there is no evidence of contamination by vermin</td>
</tr>
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VC.2

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<tr>
<td>Bait plan</td>
</tr>
</tbody>
</table>

VC.3

<table>
<thead>
<tr>
<th>Pets and other animals must not have access to poultry houses and service buildings</th>
</tr>
</thead>
</table>

Whilst these standards are not decided, they provide an indication of the direction that Red Tractor is taking in its standards review.
Quantity of product used does not indicate of the quality of use. As such, identifying trends in rodenticide usage in agriculture would not provide an adequate overview of the way in which rodenticides are used in the agricultural sector or whether it was used according to stewardship guidelines. In addition, rodenticide manufacturers and approval holders are unwilling to share sales data on rodenticides and even if they were, separating the sales to a sector level would not be practicable.

Therefore, the Agriculture Group proposes a Knowledge, Attitude and Practice (KAP) survey for agricultural rodenticide users. This would provide an accurate representation of the sector’s attitude to rodenticide use and compliance with best practice. It has been agreed that CRRU will be approached for funding for a KAP survey.

The Agriculture Group intends to monitor the uptake and understanding of the Scheme’s messages after one, two and three years of awareness raising campaigns and activities. We expect to see a large increase in agricultural user compliance with best-practice and understanding of both the issues of irresponsible use and responsible use SGARs in this timeframe. At the three year KAP survey, we expect to see a levelling-off of uptake of the ‘new’ message. The scheme is designed to be responsive to this change and will evolve to meet the needs of the campaign by using the results from the surveys (particularly those depicting the penetration of messages to different sectors) to inform decision making on future communication approaches.

g. Extension of use arrangements:
The Agriculture Group believes that both the development of the proposed Code of Practice for use of SGARs in “open areas” for agriculture and the other recommendations of the Agriculture Group’s Stewardship Scheme should enable their permissible usage in the future.

h. Enforcement (including voluntary initiatives):
As previously mentioned, Red Tractor Assurance has Vermin Control standards that apply to their 78,000 farmers/growers. The existing standards, which already tackle some of the best-practice recommendations of CRRU have been subject to proposed changes bringing them further in line with the CRRU code. These new proposed standards were open to consultation (which closed at the end of January 2014) and will now go to Technical Advisory Committees and Boards before the approval process is complete. Final versions of the standards manuals will be published in June 2014 and must be implemented on-farm by their 78,000 farmers/grower members from October 1st 2014.

i. Oversight Arrangements:
HSE, Defra and DoH, as previously agreed. The Agriculture Group is content with these arrangements.
j. Authorisation conditions:
It was agreed that authorisation conditions do not directly relate to the Agriculture Group’s remit.

COMMUNICATIONS STRATEGY
Developing additional material:
Additional material (“open areas” guidance, 7-step checklist pocket card, online “open areas” training module, and practical “open areas” training module) will be developed post-approval of the Stewardship module, and practical “open areas” training module) check list pocket card, online “open areas” training Additional material (“open areas” guidance, 7-step Developing additional material:

Agriculture Group’s Communications Outreach

<table>
<thead>
<tr>
<th>Agriculture Group Member</th>
<th>Sphere of Influence</th>
<th>Communications Channels</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Farmers’ Union (NFU) (Chair)</td>
<td>55,000 Farmer Members.</td>
<td>NFU communications: Website, British farmer and Grower magazine, Twitter, briefings and departmental newsletters etc.</td>
</tr>
<tr>
<td>Animal Health Distributors Association (AHDA)</td>
<td>86% of animal health product distributors plus suppliers manufacturing and wholesale companies plus independent organizations with interests within the supply of animal medicines.</td>
<td>AHDB communications: Website, Twitter, press releases, farmer discussion groups for various sectors etc. Pig and Poultry Fair – BPEX stand can house leaflets etc.</td>
</tr>
<tr>
<td>Agriculture and Horticulture Development Board (AHDB)</td>
<td>As a statutory levy board funded by farmers, growers and others in the supply chain, AHDB represents the interests of 75% of total agricultural output in the United Kingdom (UK).</td>
<td>AIC communications: AIC Journal published quarterly and forwarded to members and stakeholders, AIC website, members’ briefings. AIC members who sell and supply rodenticides may also disseminate information to their clients via their websites, newsletters, and where appropriate, literature supplied by the rodenticide manufacturer of the stewardship scheme.</td>
</tr>
<tr>
<td>Agricultural Industries Confederation (AIC)</td>
<td>Represents 250 Members in the agri-supply trade. The sectors and % representation of product delivered to farm gate is shown below: Animal Feed 90% Crop Protection and Agronomy 90% Fertiliser distribution and manufacture 95% Grain and Oilseeds trading 90% Seed production and distribution 80%</td>
<td>BASIS communications: Professional Register members and Nominated Store Keepers – newsletter/website.</td>
</tr>
<tr>
<td>BASIS (Registration) Ltd</td>
<td>BASIS administers the BASIS Store Inspection and Assessment Scheme with over 650 registered stores and also represents 4,800 members of the BASIS Professional Register.</td>
<td>BASIS communications: Professional Register members and Nominated Store Keepers – newsletter/website.</td>
</tr>
<tr>
<td>British Egg Industry Council</td>
<td>Inter-professional association for UK egg industry. Members are the 11 major organisations concerned with the egg industry – breeders, hatcheries, pullet rearers, egg producers, packers and processors. Owns and administers the Lion Quality scheme for eggs which accounts for over 85% of UK egg production.</td>
<td>BEIC communications – website, newsletters, meetings etc.</td>
</tr>
<tr>
<td>British Pig Association</td>
<td>Represents over 1500 small scale pig producers.</td>
<td>Magazine Practical Pigs which has a print run of 10,000 copies</td>
</tr>
<tr>
<td>British Poultry Council</td>
<td>Represents producers of poultry meat from chickens, turkeys, ducks and geese, and addresses issues on all parts of the production chain: breeding, hatching, growing, and processing.</td>
<td></td>
</tr>
<tr>
<td>Country Land and Business Association (CLA)</td>
<td>33,000 Members.</td>
<td>CLA communications: Land and Business Magazine, website, e-news, twitter and regional teams for distribution.</td>
</tr>
<tr>
<td>Farmers Union of Wales</td>
<td>Wales-specific farming Union representing the interests of farmer members. Presence across the country with 12 county offices, providing advice and support to the farming community.</td>
<td>FUW communications: Website, press releases, monthly publications to members, briefings, dissemination of information via county offices etc.</td>
</tr>
<tr>
<td>LANTRA</td>
<td>Supporting land-based and environmental industries through development of technical training.</td>
<td>Website, Social Media (Twitter, Facebook, LinkedIn), exhibitions/events and training provider network etc.</td>
</tr>
<tr>
<td>National Pig Association (NPA)</td>
<td>Representing pig producers (over 73% of the national sow herd) and associated allied industries.</td>
<td>NPA communications: Website, magazine articles and briefings etc.</td>
</tr>
<tr>
<td>Red Tractor Assurance</td>
<td>Approximately 78,000 farmers and growers are members of a Red Tractor Assurance farm scheme.</td>
<td></td>
</tr>
</tbody>
</table>

In addition, as part of the awareness-campaign, the Agriculture Group will ensure shared messaging across other existing voluntary schemes such as Campaign for the Farmed Environment (CFE) and the Voluntary Initiative (VI).

The NFU has already pre-emptively collaborated with the CFE who have agreed to promote the scheme through their regional networks which will take the Stewardship Message across all counties via their regional coordinators.

The Agriculture Group also intends to spread the message of SGAR Stewardship to NRoSO practitioners. We will highlight the Scheme as a topic issue in NRoSO training which will ultimately see the 22,000 members trained. Furthermore, the whole membership will be reached through an article in Pro Operator.
APPENDIX 1 – Beef and Sheep; Dairy; Poultry; Pigs – Red Tractor

“VC.1 K An effective control system must be in operation in the areas detailed to control infestation by vermin and other animals. (B.VC.1) (L.VC.1) Control can be undertaken either in house or by outside contractors. Attention should always be paid to the safe placing of bait. Control is necessary in areas where feed is stored to prevent feed contamination and the spread of certain vermin borne diseases. Further guidance is provided in the relevant appendix.”

Appendix VC.1

Vermin Control Policy

This policy relates to controlling pests and rodents within and around feed storage areas.

Control
- Ensure all bailed feed is stacked tidily on pallets off the floor and away from the walls
- All split feed under feed bins should be swept up and removed
- Feed stored loose on the floor or in bunkers should be covered unless the whole building can be vermin proofed
- Temporary baits - Check baits every week and continue baiting for one week after baits have stopped being taken
- Permanent baits - Check baits every 2 weeks. If signs of feeding are found replenish the bait and re-survey the premises. Place baits in drain pipes placed at the base of straw
- Baits must be placed safely; they should not be accessible to non-target species and not contaminate feed.

Survey
- Ensure feed storage areas are checked for pests on a regular basis.

Clean
- Remove and dispose of all dead rodents found and all unused clearance bait boxes
- Prevent access to the bait by children and other animals
- Remove all rubbish and overgrown vegetation from outside the buildings. Keep woods and grass short

Proof
- Block all holes wherever possible. Wire mesh on windows should be no larger than 6 mm to keep out mice.
- Seal junctions between walls, floors and ceilings with metal sheeting.
- Seal water cisterns and header tanks. Seal and remove obsolete plumbing.

APPENDIX 2 – Combinable Crops and Sugar Beet – Red Tractor

VERMIN CONTROL (VC)

Control of vermin (including birds, rodents and insects) and other animals (including cats and dogs) is vital to prevent contamination of animal feed or harvested crops. This is important in the production of safe food, managing biosecurity and preventing the spread of disease.

<table>
<thead>
<tr>
<th>VC.1</th>
<th>K An effective control system must be in operation in the areas detailed to control infestation by vermin and other animals. (CR.VC.1)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Control can be undertaken either in house or by outside contractors. Attention should always be paid to the safe placing of bait.</td>
</tr>
<tr>
<td>VC.1.1</td>
<td>Effective vermin (including rodent) control measures must apply to all storage sites and these control measures must comply with statutory label instructions and be recorded. The records must include a site plan showing the location of bait points and be kept for 2 years. (CR.VC.1.1)</td>
</tr>
<tr>
<td>VC.1.2</td>
<td>The vermin control system must prevent bird, rodent and domestic animal entry to all long-term grain storage. Entry points around gutters, eaves, doors, loading pipes etc should be secured. Doors should be kept shut wherever possible and stores kept as dark as possible. Where stores are multi-purpose/mixed usage it may not be possible for safety reasons to darken stores and this is acceptable. Contamination of stored grain with vermin bait must be avoided. Baits must be placed in such a manner that non-target species do not have access to them. Baiting stations must be kept well away from the stored grain. (CR.VC.1.2)</td>
</tr>
</tbody>
</table>

See HSE Agriculture Information Sheet No 31 available from HSE Books, PO Box 1999, Sudbury, Suffolk CO10 2WA Tel. 01787 881165
APPENDIX 4 –
Lion Code of Practice (Eggs)

**Standard** - There must be a documented, effective control programme against wild birds, vermin, rodents and pests in poultry houses and feed stores. Effective measures must be taken by suitably trained personnel to control vermin, rodents, flies and other arthropods including the elimination of potential breeding areas. Such control measures must be carried out using licensed products in accordance with the manufacturer’s instructions, and must be logged to enable Senior Management to determine that the necessary operations have been carried out.

A copy of the DEFRA ‘Code of Practice for the Prevention of Rodent Infestations on Poultry Farms’ must be available.

**Guidance** - Conduct visual assessment of a clear bait plan and notes of actions taken and baits used. If undertaken by a contractor nothing else required. If ‘in house’, records on purchase and use should be available. (Written Assessment)

The importance of an effective rodent control programme in controlling Salmonella on farms cannot be stressed strongly enough.

(A ‘pest’ is defined in these Guidance notes as an insect or animal harmful to food or livestock).


**Standard** - Third party contractors shall demonstrate appropriate competence.

**Guidance** - Contractors bait plan and inspection reports should be available for inspection. Control of rodents is to be through a recognised third party who are members of British Pest Control Association (BPCA), or National Pest Technicians Association (NPTA), or who employ equivalent standards, or by company personnel trained and operating to BPCA or NPTA or equivalent standards.
2. Proposals for the Stewardship of the Second-generation Anticoagulant Rodenticides (SGARs) in the UK from the Gamekeeper Sector Group

Introduction
This document has been prepared for the SGAR Stewardship oversight group: Health and Safety Executive (HSE), Department of Environment Food and Rural Affairs (Defra) and Department of Health (DH). It comes from the Gamekeeping Sector Group, which comprises the National Gamekeepers’ Organisation (NGO), Scottish Gamekeepers’ Association (SGA), British Association for Shooting and Conservation (BASC), Game and Wildlife Conservation Trust (GWCT) and Countryside Alliance (CA)1. The meetings to prepare the paper were arranged by the Campaign for Responsible Rodenticide Use (CRRU), to which we are grateful.

The paper details how Stewardship for second generation anticoagulant rodenticides (SGARs) can work in the Gamekeeping Sector, in line with the required features specified in the HSE’s document, ‘SGARs: Development of a Stewardship Regime’, of 9 August 2013.

Background
Rats are controlled by virtually all gamekeepers2 because they are major predators of the eggs and chicks of ground-nesting birds. Gamebirds and wildfowl are the main beneficiaries of this control but many other non-quarry species benefit too.

Many gamekeepers also rear gamebirds in captivity for subsequent release and, like all livestock, these birds need to be protected from attack by rats and the diseases they can carry, partly for animal welfare and partly for economic reasons.

Additionally, rats are significant consumers of feed put out to assist gamebird populations. They also damage crops and habitats planted for game and wildlife conservation and they spread diseases of gamebirds, wildlife, and humans.

Rat control by gamekeepers is also important for the agricultural interests on land across which they work and this role is often reflected in a gamekeeper’s specified duties.

Gamekeepers carry out their rat control primarily in open areas, away from buildings. They use a number of techniques, including traps, shooting, gassing compounds, terriers and - in the few areas where resistance has not rendered them useless - the first generation rodenticides. But numerically by far the most important and economically viable means of controlling rats in the wider countryside today is the use of SGARs.

1 A full list of members of the Gamekeeping Sector Group appears at Appendix 1.
SGARs are used by three-quarters of all gamekeepers\(^1\) and the commercial importance of their doing so is easily illustrated. About two million hectares of the UK are managed by gamekeepers for live quarry shooting and this is worth in total £1.6 billion annually in the UK\(^2\). Effective rat control is a key to this substantial part of the rural economy.

Currently, there is great concern in the gamekeeping sector because the availability of SGARs registered and labelled for use away from buildings is rapidly diminishing. (The term used for this in the European Commission risk assessment process is ‘open area’ use). The profession understands the need for safe use of rodenticides and the requirement to minimize risks to the environment. For its part, the HSE now recognises the commercial importance of game management and the need for gamekeepers to have recourse to SGARs for controlling rats. A Stewardship approach is being planned for managing environmental risks whilst allowing essential open area use of SGARs to continue.

There is a timing element to this issue, however, which must be taken into account. As a result of the changes when SGARs were re-registered under the Biocidal Products Regulation, none of the difenacoum-based products can still be used legally in open areas in the UK. Baits based on bromadiolone are all now nearing the end of their individual 18-month use-up periods. Rat control in rural areas will intensify from February 2014. Without urgent implementation of Stewardship, or effective temporary measures, we are likely to see a crisis in the supply of SGARs labelled for open area use within a few short weeks.

Given that open area use of SGARs is essential, not just to gamekeeping but to pest controllers and the agricultural sector too, some form of interim measures whereby operators can continue to use these products without risk of prosecution is imperative whilst steps towards Stewardship are completed.

Stewardship in Gamekeeping and its Interface with Other Sectors

Within the wider lifespan of SGARs (production to disposal), Stewardship in the gamekeeping sector will focus particularly on those stages from purchase, through deployment, to the disposal of surplus product and the carcasses of treated rats. There needs to be a joined-up approach where Stewardship crosses such sector boundaries. For example, manufacturers and retailers need to ensure that labelling and point of sale advice support what the gamekeeping sector is requiring of its own community and vice versa.

In this document we have concentrated on implementing Stewardship by gamekeepers but as the oversight group looks at the papers provided by the different sectors, there is bound to be overlap between them. Correct outdoor use of SGARs by farmers will have much in common with use by gamekeepers, for example, and there is much to be said for having a combined approach wherever possible.

Having said that, there are differences between sectors. For example, and as identified by the Stakeholder meeting at Crosby in April 2013, the process needs to recognise that there will be differences in risk between use in urban open areas and rural open areas. In the former, alternatives to SGARs such as traps, gassing compounds and shooting may not be compatible with public safety. In the less frequented countryside, by contrast, risks to the public are much lower than in urban parks but the risks to non-target wildlife may be higher.

These differences in risk must be reflected in the specific approach to Stewardship taken by the various sectors but the Stewardship process needs to draw things together between sectors where it can. It must retain any differences that are significant but also combine and simplify whenever possible. The coordinating role of CRRU, supported by the oversight group of HSE, Defra and DH, will be important in ensuring that this is achieved. The guiding principle throughout should be to strive for: “As much commonality as possible but with as much difference as is strictly necessary – and no more.”

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Elements of Gamekeeper SGAR Stewardship

The HSE paper of 9 August challenged each sector, as a starting point, to develop the detail of eleven elements of stewardship. We have done this for the Gamekeeping Sector below, using the headings provided by the HSE. We have then addressed the other aspects of Stewardship that we were asked to consider. But before getting into the detail, we start by setting out our underlying approach:

Gamekeeping is about helping species through sound management and most gamekeepers are therefore knowledgeable about wildlife and predisposed to looking after it. Gamekeepers, whatever their employment status, are vocational professionals, highly motivated by doing things right and by delivering results. At the same time, they are often lone workers, self-motivated, not comfortable in the classroom, and strangers to paperwork and bureaucracy. To succeed in the gamekeeping sector, therefore, Stewardship needs to play to gamekeepers' strengths and avoid imposing the unfamiliar.

The gamekeeping sector bodies (NGO, SGA, BASC, GWCT), supported by CRRU, have already done much work in preparing an approach to rat control that minimises risk of non-target wildlife becoming contaminated with SGAR residues. It was set out in the 2012 document Rat Control and Game Management, published by CRRU. The HSE has seen this document and welcomed it as an excellent basis for good practice. The guidance has recently been promoted to and accepted by the gamekeeping community as being both workable and effective.

Building on this start, we propose a three stage approach to Stewardship, aligned with the Government’s commitment to the five principles of better regulation and also in accordance with the Regulator’s Code:

**Firstly**, we would welcome HSE approval of the gamekeeping sector’s existing, very recent guidance. This would provide an appropriate level of formal underpinning to our Stewardship approach.

**Secondly**, we believe that this Approved Gamekeeping Code should be referenced on the product labels, again supporting our Stewardship approach. There will be other Codes put forward by other sectors and suitable for their particular needs (e.g. agriculture, professional pest controllers). Product labels will therefore need to specify that use should be in accordance with the approved code that is relevant to product deployment – and it should list approved codes.

**Thirdly**, and complementary to these two steps, the gamekeeping sector has already developed a one-day course based on the advice in our guidance. This was the product of work between the NGO, the SGA and CRRU but it is being made available to others to be offered at an affordable price by all the gamekeeping bodies, so that anyone wanting more advice on their obligations to follow the Approved Gamekeeping Code can find relevant training, designed specifically for the gamekeeping profession, readily available.

We plan to add video materials to the above and also to coordinate a significant PR campaign in support of Stewardship, through the media, our own members’ publications, the internet and social networking.

The above approach to Stewardship will deliver real results because it has ‘bite’ at the appropriate point in SGAR use. It focuses on the moment that someone actually deploys the product and it requires them to do so safely. Other approaches that focus on who can or cannot buy particular products, or who has or has not been formally trained, have no actual ‘bite’ at the point that matters most – the moment of deployment.

We are therefore confident that this overall approach is proportionate to the problem identified and will deliver Stewardship across the whole gamekeeping sector. We develop it further in our following responses to each of the HSE’s headings:

**a. Product Labelling**

Currently, product labels are long, complicated and often printed in tiny fonts because of packaging constraints. Instead of being clear, legal warnings, they are all too often regarded as ‘small print’ which is seldom read.

We would like to see the detail necessary for correct use of SGARs by each sector set out in Approved Codes, published in full elsewhere and referenced on the product labels.

There might be different codes for each sector (see below), or they might be combined – in part or whole. The label should only include the essential safety information for the product and reference to the Approved Code(s).

Links to the Approved Code(s) themselves could be provided on the label as web uniform resource locators (URLs) and perhaps additionally in the form of Quick Response (QR) codes (‘chess boards’) from which purchaser could immediately access the Approved Code(s) via a mobile phone or iPad.

**b. Point of sale conditions**

Hard copies of the Approved Code(s) should be available in store and should be offered to all purchasers. Retailers should remind customers that use of the product is dependent on following the Approved Code(s) and, if they are unaware of this, supply the code(s) appropriate to the customer’s needs.

Layouts in store should make it clear which products are ‘professional use only’ and which are for amateurs. (Currently it is often hard to distinguish).

We understand there are problems with keeping ‘professional only’ rat baits behind the counter when the volumes are so large but we think better displays and clearer labelling could go a long way to clarifying which product is which out on the aisles themselves.

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1 Available online via the following page: http://basc.org.uk/gamekeeping/rodenticides/
2 Comments made by Nicola Gregg (HSE) at the Gamekeeping Sector stewardship meeting on 14/8/13
Internet sales, which are increasing, must be linked to the Approved Code(s), ideally with a facility for downloading and perhaps a ‘tick box’ for the purchaser to confirm that they understand use must be in accordance with the Approved Code(s).

We do not think it is feasible to require purchasers of ‘professional only’ products to demonstrate their professional status at the point of purchase. Many farms and estates buy such products centrally for use by their professional staff and the people making the purchase are therefore not the end-users. Nor do we think that the heavy bureaucracy required would have much benefit, if any, in addressing the secondary poisoning issue itself (see (e) below).

c. Guidance / codes of practice
There are far too many unofficial codes of practice and guidance documents about the correct use of SGARs7 but they largely say the same things. There are important distinctions, of course, between how these products must be used in differing circumstances (e.g. indoors, outside in populated open areas and outside in rural open areas) but much of the health and safety advice is common to all situations, whilst sector specific advice (e.g. farmer, gamekeeper, professional pest controller, amateur) will differ in content and emphasis but with significant overlaps.

We think that as a matter of principle, the fewer the number of codes, the clearer the information will be and the more likely it is to be followed. Several of the current codes could easily be combined, either into one overarching document which gave general advice applicable to all, before giving separate advice specific to particular user groups, or indeed as a suite of separate but associated Approved Codes. Either way, it would be very helpful if such code(s) could be produced officially under an HSE introduction.

We are not prescriptive about how this rationalisation of existing codes could be done, nor are we precious about how our own gamekeeping advice (the 2012 document Rat Control and Game Management, published by CRU) is incorporated but we are convinced that (a) everything that needs to be said about the safe use of SGARs is already available in print and (b) it would not be a huge task to take the best bits from the many existing documents and to make a consistent, HSE branded code or codes, which would cover the needs of all user groups and emphasise the Stewardship message.

Our own guidance document Rat Control and Game Management, which we propose should become the basis of the Approved Code for Stewardship in the gamekeeping sector, is all about reducing risk to non-target species. It takes a stepwise approach, requiring first that all measures are taken to manage any risks that might encourage rats. It then urges timely control, using trapping, shooting, gassing and terriers if possible, with rodenticides to be seen as a last (if often necessary) resort. First-generation compounds are to be preferred in areas where they still work but where SGARs must be used, our guidance goes into detail about ways to minimise risk to non targets, covering all issues from bait laying and burrow baiting to disposal of rat carcasses and any remaining excess product. The HSE has seen this guidance and commented on its quality and clarity.

d. Other accreditation / licensing schemes
Mention was made at the Crosby stakeholder meeting of using General Licences under the Wildlife and Countryside Act to empower specific sectors (e.g. gamekeepers, farmers, pest controllers) to use SGARs. We do not believe the existing power to make General Licences under the Act can be used for this purpose and we cannot see how such a process would benefit the aims of Stewardship but there may be scope to readdress this in the next few years should legislation be forthcoming to address the conclusions of the ongoing review of wildlife law being undertaken by the Law Commission.

e. User training / competence assurance
What really matters in Stewardship is that whoever is using the product is using it correctly.

Whether the product is classified as ‘professional’ or ‘amateur’, or the user is ‘professional’ or ‘amateur’, or has a certificate to prove it, or a piece of paper to show he once had some form of training, are all secondary issues. The key to success is how the product is actually being used on the ground.

This can be best achieved through a readily available, clearly written Approved Code(s), referenced on the product labels and backed up by enforcement.

It is clearly desirable that good quality, voluntary training is also readily available and that all sectors encourage SGAR users towards it.

Our own sector has a course all ready to be adapted in the light of Stewardship decisions for rolling out in gamekeeping colleges and through our own organisations’ training departments. We propose doing this as a major plank of our sector Stewardship campaign but we do not support compulsory training and/or certification, for they are no guarantee of best practice on the ground.

f. Monitoring requirements
The main aim of Stewardship is to reduce the contamination of the environment, particularly non-target wildlife, by SGARs. We already have two good sources of monitoring, the Wildlife Incident Investigation Scheme (WIIS) scheme and the Predatory Birds Monitoring Scheme (PBMS) which have, not least, brought the issue of SGAR residues in wildlife to light.

7 Just some of the existing documents include are listed in Appendix 2.
PBMS is a good scheme but clearly limited in scope to raptor species. The wider WIIS scheme is particularly valuable as it can pick up SGAR abuse and misuse across the board.

It is a rare advantage to have such monitoring already in place before implementing a change, so every effort should be made to keep WIIS (and PBMS) going. This way an assessment can be made of progress addressing contamination of wildlife as Stewardship goes forward.

In addition, CRRU has suggested carrying out regular KAP surveys among SGAR users, to monitor their knowledge of the law and the on-label requirements and to assess their responses to them. We support that suggestion and are happy to contribute towards KAP surveys of our memberships. If Stewardship is working, awareness of its key messages should increase over time and be measurable in this way.

g. Extension of use arrangements
We understand that HSE is persuaded by the science that there can be no distinction between the five second generation anti-coagulant rodenticides and that all should have the same availability. This is very welcome as it will make addressing resistance issues much easier. The extension of use arrangements agreed under Stewardship need to apply to all five actives.

Our proposal, detailed above, is that SGAR use be extended from the current (very recent) scenario, which is limited to use ‘in and around buildings’, to allow ‘open area’ use as well, provided this is done within HSE-approved codes of practice.

Once introduced, the stewardship regime we propose would address all the risks identified.. There will, however, be an additional need to overcome shortages of appropriately labelled product in the short term, via transitional measures.

h. Enforcement (including voluntary initiatives).
Under our proposals (above) correct use of SGARs would become a legal requirement and offences would thus be clarified. Poor practice would be a breach of the on-label requirement to follow the code(s) and the legal scope for enforcement would increase considerably.

There is a renewed interest in combating rural crime, of which illegal use of SGARs would be an example, and many forces are building up their response, encouraged by Police and Crime Commissioners and the re-vamped police National Wildlife Crime Unit.

There is clearly a need, as part of Stewardship, to ensure that the police, especially in rural areas, are aware of any changes in the law and understand the requirements of any Approved Code(s). Catching SGAR abusers/misusers will be far easier than for many wildlife crimes because SGAR use is static and endures over time, unlike poaching, for example, where catching criminals red-handed has always been problematic.

Other agencies which could help with enforcement, and therefore require briefing, include Natural England, Natural Resources Wales, Department of Environment NI and Scottish Natural Heritage. Also Trading Standards (especially in relation to point of sales issues and storage).

It should also be remembered that gamekeeping has its opponents and that organisations connected with bird protection and animal rights are engaged in constant surveillance of gamekeepers, taking every opportunity to bring prosecutions for any wrongdoing.

i. Oversight arrangements
As a sector we are content with the concept that Stewardship is overseen by the proposed oversight group comprising HSE, Defra and DoH but we note this does not include devolved authorities, which will need to be brought into the process in some way. We like the idea of each sector group (suppliers/ amateurs, professional pest controllers, farmers, gamekeepers) being represented by a Group Chairman at meetings with the oversight body and to help champion the cause of Stewardship within each sector. We have already appointed our own sector chairman for this purpose.

We assume that HSE/Defra/DoH will decide what they want by way of feedback meetings and reporting frequency and we are happy to go along with any reasonable requirements.

j. Authorisation conditions
These will be determined in accordance with the above approach to Stewardship for our sector.

k. Other
It would be helpful to have an easier way for rodentine users to find out, online, which products (by brand name) are approved for which purposes and subject to which conditions of use. At present, finding this out is no easy task and we believe people would end up buying the right product for their needs more often if this information was more readily available to the public.

DEVELOPING THE MATERIALS AND GUIDANCE TO SUPPORT STEWARDSHIP
The main materials to roll out Stewardship in the gamekeeping sector have, fortuitously, already been created over the last two years. They comprise:

- The 2012 document Rat Control and Game Management prepared by CRRU, BASC, GWCT, NGO, SGA and published by CRRU. This would form the basis of the Approved Code for our sector (see (c) above).

- The NGO/SGA/CRRU one day course, already written, BASIS approved and seen by HSE. This is essentially the training related to the above guidance/ Approved Code and could be available to all who wanted it. The three organisations which originated the course are prepared to waive ownership in the interests of Stewardship and to see it provided by others (e.g. BASC and the colleges), as well as by themselves.
In addition to the above, we believe there is a role for a freely available video presentation on the Approved Code. BASC has a professional video production team and they have offered its services to create a presentation which could be accessible via YouTube and accessed from our various organisations’ websites.

Guiding operators towards these materials and ensuring they know their responsibilities will be achieved via a coordinated campaign comprising:

- A prominent national launch of Stewardship across all sectors as soon as the way forward is agreed.
- Articles in the members’ magazines of all five organisations in the Gamekeeping Sector Sub-Group. These have relevant circulations, some in excess of 120,000 copies, and are seen beyond the gamekeeping community, which will also help increase awareness of the issues. Between our publications, we are already reaching virtually everyone who may use SGARs in a gamekeeping context.
- Website and social media campaigns in support of the above.
- PR in the commercial trade press (shooting magazines and online). Several of our organisations already write regularly for these, so messages can easily be rolled out.
- Coverage at dozens of regional events run by our organisations for our members and their friends.
- Coverage on our show stands at the many game and agricultural fairs we all attend each year.

We are confident that with our five organisations working together for a new, concerted Stewardship approach across our sector, the vast majority of gamekeepers will become aware of the campaign messages and will act on them.

**SUCCESS CRITERIA AND ASSESSING EFFECTIVENESS**

Success will deliver a drop in SGAR residues in the environment and in non-target wildlife in particular. Sustained monitoring through WIIS and PBMS (see (f) above) will measure progress towards this point.

It will take time for residues arising from current use patterns to cleanse from the environment (for example, animals currently carrying residues will still do so even after SGAR use patterns have changed). Because of this delay, we suggest five years from now as a reasonable target for SGAR residues to reduce, as evidenced by WIIS and PBMS. By that time, it may be possible to set more ambitious targets for future reductions in residues, as the rate of progress arising from Stewardship will by then be known.

The KAP survey work proposed by CRRU (discussed in (f) above) will measure the extent to which the Stewardship campaign messages are getting through to operators.

Other measures of campaign success will be:

- The extent of media coverage relating to the campaign, which can be measured.
- Hits on relevant pages of the organisations’ websites and on YouTube materials.
- Associated activity on social media and Twitter (‘likes’, ‘shares’, ‘downloads’ etc of materials relevant to Stewardship).
- Uptake of our sector training course by colleges and other training providers.
- Attendance numbers for those courses.

**MANAGING THE RISKS**

The HSE identified, in paragraph 13 of its paper of 9/8/13, some potential risks which might result in Stewardship failing. We comment on each of these below:

a. Users don’t comply with Stewardship requirements

We believe this risk is low and that the vast majority of gamekeepers will comply. They belong to, respect and are led by our organisations and in the past joint campaigns of this type have achieved excellent results.

Crucial in reducing this risk, however, will be agreement by Government of the change in product labels, requiring an Approved Code to be followed.

b. Lack of willingness to pay costs required by Stewardship

The cost disincentive is always a concern and the more so in tough economic times. The risk can be minimised by keeping the overall costs of Stewardship as low as possible, compatible with success.

Within our sector, the approach, materials and PR Campaign we are proposing can be achieved at relatively low cost. Origination of the main materials (guidance/ and course) has already been paid for. The cost of converting our guidance into an Approved Code will be moderate and can be absorbed by our organisations. The production of the proposed video can be achieved through the existing facilities of a key stakeholder. The availability of the course can be self-funding by charging attendees, and we will urge that the basis for charging should be no more than cost-recovery, in order to keep prices down to encourage attendance.

c. Loss of focus and direction because of lack of ownership

Stewardship within the gamekeeping sector will
be very strongly owned by the five organisations on the Sector Sub-Group. We are few in number, used to joint working with one another, consistent of view and confident in our chairman.

At grass roots level, the huge importance of SGARs to gamekeepers will be a very strong incentive for individuals to get involved and to comply.

d. Stewardship results in unacceptable risk to non-target species

We believe that Stewardship in our sector, as outlined in this paper, will significantly improve the use of SGARs by gamekeepers. We cannot answer for other sectors, of course but improvements can doubtless be made within those too. Overall, we are confident that the Stewardship process will reduce environmental risk. The extent to which it reduces it can only be a matter for speculation at this stage but the monitoring proposed will determine and measure that in time.

The question of whether or not any remaining risks (and there will always be some) are deemed ‘acceptable’ or ‘unacceptable’ is really a matter for judgement by the public, their politicians and for the appropriate Competent Authorities. At the moment, the European/UK view seems to be that SGARs are so important that some risk must be accepted, provided everything is being done to mitigate it. We think the Stewardship approach now being pursued in the UK can be an excellent mitigation measure and will command the respect of politicians and public alike.

FINALLY...

We explained at the start of this paper just how important SGARs are to the gamekeeping sector and the predicament our members will very soon be facing as products labelled as legal for outdoor use become unavailable. We want to end by re-emphasising the urgency.

The imminent introduction of Stewardship or at least some interim transitional measures so that gamekeepers can carry on using SGARs within their important work, is essential.

As a sector, we have responded wholeheartedly to the HSE’s call to develop Stewardship as a way forward out of a difficult situation. We have suggested a simple, deliverable scheme that will address the risks that have been identified to non-target wildlife. We now need to see rapid acceptance by the oversight body, so we can move as fast as possible to where we all need to be.

GAMEKEEPING SECTOR GROUP
12 FEBRUARY 2014
# APPENDIX 1
Members of the Gamekeeping Sector Group

<table>
<thead>
<tr>
<th>Name</th>
<th>Position and Organisation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charles Nodder*</td>
<td>Political Adviser, NGO</td>
<td>National Gamekeepers’ Organisation (NGO) 5,000 gamekeeper members across England and Wales</td>
</tr>
<tr>
<td>Glynn Evans</td>
<td>Head of Game and Gamekeeping, BASC</td>
<td>British Association for Shooting and Conservation (BASC) 135,000 members across UK, including many game shooters and gamekeepers</td>
</tr>
<tr>
<td>James Legge</td>
<td>Head of Political Section, CA</td>
<td>Countryside Alliance (CA) 100,000 members across the UK, including many game shooters and gamekeepers</td>
</tr>
<tr>
<td>Mike Swan</td>
<td>Head of Education, GWCT</td>
<td>Game and Wildlife Conservation Trust (GWCT) Research and advisory body, educating gamekeepers and others</td>
</tr>
<tr>
<td>Alex Hogg</td>
<td>Chairman, SGA</td>
<td>Scottish Gamekeepers’ Organisation Representative body for gamekeepers in Scotland</td>
</tr>
</tbody>
</table>

*Sector Group Chairman

# APPENDIX 2
Existing Codes of Practice on SGAR Use

- BPCA: Safe Use of Anticoagulant Rodenticides by Professional Users
- CIEH: A Guide to Carrying out an Environmental Assessment Prior to the use of Rodenticides
- CIEH: National Sewer Baiting Protocol
- CIEH: Review of the Use of Bait Boxes
- CRRU: Code of Practice for Rodentine Use
- CRRU: Rat Control and Game Management
- CRRU: Environmental Assessment When Using Anticoagulant Rodenticides
- DEFRA: Code of Practice for the Prevention and Control of Rat Infestation at Poultry Farms
- EBPF: Guideline on Best Practice Using Rodenticide Baits as Biocides in the EU
- KILGERM: Guide to Environmental Assessments when using Rodenticides
- HGCA: Rodent Control in Agriculture
- HSE: Urban rodent control and safe use of anticoagulant rodenticides by professional users
- HSE: Safe Use of Rodenticides on Farms and Holdings
3. Proposals for the Stewardship of the Second-generation Anticoagulant Rodenticides (SGARs) in the UK from the Professional Pest Control and Local Authority Sector Group

**Introduction**
This report has been prepared for the SGAR Stewardship oversight group: Health and Safety Executive (HSE), Department of Environment Food and Rural Affairs (Defra) and Department of Health (DoH)

It has been compiled by the Professional Pest Control Sector comprising the British Pest Control Association (BPCA), National Pest Technicians Association (NPTA), Chartered Institute for Environmental Health National Pest Advisory panel (NPAP), Royal Society for Public Health (RSPH), BASIS Professional Register of Managers & Pest Control Technicians (BASIS PROMPT) and Killgerm Chemicals Technical Department / Killgerm Training.

The paper details how Stewardship for second generation anticoagulant rodenticides (SGARs) can work in the Professional Pest Control Sector, in line with the required features specified in the HSE’s document, ‘SGARs: Development of a Stewardship Regime’, of 9 August 2013.

**Background**
It is estimated that a total of approximately 8,000 pest control technicians are currently operating in the professional pest control sector in the United Kingdom, an industry with a turnover of £340million. Around 90% of these technicians are employed in the Private sector.  

The two trade bodies representing the industry are the British Pest Control Association (BPCA) with servicing companies employing around 3,500 technicians and the National Pest Technicians Association (NPTA) having memberships of approximately 2,000 technicians. Furthermore, it is estimated that there are approximately 882 pest control technicians employed directly by local authorities.

These are overall figures as some local authorities are BPCA members, some local authority staff will be members of NPTA and some individuals / organisations will be members of both NPTA and BPCA. It is important to stress, however, that the vast majority of professional pest control technicians are members of an organisation that can hold them to account.

The professional pest control sector has a well established record for promoting training, stewardship and competence within the industry by advocating the acquisition of basic and advanced qualifications and training for technicians operating within the sector whilst also recognising the need to continually improve standards.

Rats present a significant risk to public health, especially to those whose health is largely compromised. Studies carried out in the UK and Europe demonstrate that the brown rat (Rattus norvegicus) can be infected with a large number of zoonotic agents and parasites confirming their status as a significant public health pest.

Aspects of the behaviour and biology such as their enormous reproductive potential, trap avoidance, feeding behaviour, damage to infrastructure and resistance to a number of first and second generation anticoagulant rodenticides contribute to the complexities of many control programmes.

The recent government cutbacks experienced by local authorities throughout the UK has resulted in increased charges for the control of pests within individual authorities. The control of rats, previously carried out free of charge by many local authorities is now chargeable. This means that many vulnerable residents are unable to afford the treatment charges, so are forced to treat infestations themselves using amateur products with varying degrees of success, or are simply not reporting the infestation. The consequential risk posed to the environment from use of rodenticides by amateur untrained users is of concern.

The Professional Pest Control Sector including both commercial and local authority pest control departments carry out a considerable number of treatments for the control of rat infestations in urban areas at domestic and commercial premises, in and around buildings and open spaces, in sewage networks, domestic drainage systems on behalf of Water Companies and private owners, on watercourses close to sewer storm water overflows, and in rural settings such as farm holdings and agricultural land.

In all these control programmes the principal method of control is by the use of second generation anticoagulant rodenticides, being the most practical, economical and effective method of gaining control. Other control resources such as the use of aluminium...
phosphide, shooting, trapping etc. are available but are not considered to be economic, safe or practical alternatives and such methods pose their own risks.

Without the resources of second generation anticoagulant rodenticides the control of rats in the UK by the Professional Pest Control Sector would be almost impossible to achieve and the consequential risk to public health from rodent vectored diseases would be unacceptable.

Resistance to anticoagulant rodenticides is steadily spreading throughout the UK and if this is to be effectively controlled the Professional Pest Control Sector would welcome the alteration of current restrictions on the use of SGARs in open areas so that alternative second generation compounds currently restricted to indoor use could be authorised for open area use. This is providing that adequate safeguards to protect non-target species and the environment are implemented. Measures to safeguard non-target species and the environment are proposed in the Product Stewardship “Best Practice” guidance document currently being drafted by this Sector.

The definition of the term “use in and around buildings” must include the control of rat infestations in the sewer networks, including storm water overflows and also include the ability to control rats infesting watercourses close to storm water outlets if reinvasion of the network following treatment and the migration of rats into domestic premises in urban areas is to be avoided.

There is concern that the current approvals for the use of SGARs in “open areas” away from buildings are reducing. Currently, certain products based on bromadiolone are the only second generation anticoagulant option approved for use in “open areas” and time is rapidly advancing before this approval is withdrawn. This needs to be rapidly addressed if the professional pest control sector is to continue to control rat infestations and protect public health in these locations. The sector does recognise, however, the need to protect non-target animals and the environment and these concerns are reflected in the proposed best practice document currently being drafted.

STEWARDSHIP IN THE PROFESSIONAL PEST CONTROL SECTOR AND ITS INTERFACE WITH OTHER SECTORS

The professional pest control industry has over many years demonstrated high standards of stewardship in terms of training, product supply, use and disposal.

Stewardship of SGARs in the professional pest control sector focuses particularly on training, qualifications and competence of users, supported by the controls operated through the supply chain. There needs to be a joined-up approach where Stewardship crosses boundaries and its application to all sectors within the industries.

ELEMENTS OF PROFESSIONAL PEST CONTROL SECTOR SGAR STEWARDSHIP

Best Practice - Current Situation

Aimed at improving operating standards within the industry, best practice guidance documents have been produced over recent years outlining safe and responsible treatment regimes for controlling a range of public health pests. Publications by BPCA, NPTA and CIEH NPAP, together with guidance documents from Fera (Food and Environment Research Agency, formerly CSL) and HSE have been produced for the control of rodents indoors and outdoors in open spaces. These are listed as follows:

- Guidance Note for the Safe Use of Anticoagulant Rodenticides by Professional Users - BPCA
- Pest Control Procedures Manual - Rodents - CIEH NPAP
- CEFIC/EBPF: Guideline on Best Practice Using Rodenticide Baits as Biocides in the EU
- Rat Control Guidelines a guide to Best Practice - Fera (CSL)
- Rodent Control - Barn Owl Trust
- Urban Rodent Control and the Safe Use of Rodenticides by Professional Users - HSE MISC515
- CEN Pest Management Services Requirements & Competencies prEN 16636 is currently out for approval by European Countries and is expected to be introduced across the EU in 2015. The Standard requires a professional approach to pest management, taking care of property, the public and non-target species.
In addition to the above, a Wildlife Aware training course provided by the Campaign for Responsible Rodenticide Use (CRRU) in collaboration with BASIS is available for technicians operating essentially in rural settings, although it is appropriate for baiting generally in open spaces. The course syllabus covers the environmental impact of rodenticides, including details of schemes such as the Wildlife Incident Investigation Scheme (WIIS), Predatory Bird Monitoring Scheme (PBMS), and the Campaign for Responsible Rodenticide Use, together with important updates on essential knowledge and recent developments.

Accreditation is by an examination, moderated and marked by BASIS. On gaining accredited status, participants are entitled to use the Wildlife Aware logo to signify their competence in combining effective control of rodent pests while minimising non-target animals’ exposure to rodenticides.

Further details can be found at: http://www.basis-reg.co.uk/media/documents/248/index.html

PROPOSALS FOR DELIVERY OF THE STEWARDSHIP REGIME:

The professional pest control sector recognises that there are deficiencies and possible shortcomings in relation to current penetration levels of industry qualifications and the resulting operational practices in untrained/unqualified individuals.

Not all pest control technicians operating in this sector have achieved the RSPH Level 2 qualification, which is now generally accepted as a suitable entry-level requirement for new entrants to the industry. It is a Sector proposal, therefore, that all technicians operating within this Sector should have achieved the minimum entry-level qualification and registration on an independently assessed CPD scheme such as BASIS PROMPT within a three year period.

Many other training courses and qualifications have been available in the past (and still are), which have been acceptable under COPR, so many technicians who may have been trained less recently will be operating, quite legally, under these.

To maintain and improve standards the professional pest control sector would welcome a form of “licensing” for pest control technicians who use SGARs. To qualify individuals would have to have achieved the RSPH Level 2 qualification (or equivalent) and be registered on an independently assessed CPD scheme such as BASIS PROMPT.

Furthermore, if pest controllers are using SGARs in open areas they should hold BASIS/CRRU Wildlife Aware Accreditation.

It is understood that formal licensing by enforcement authorities is not a viable option due to current government policy on deregulation. It is therefore proposed that an industry scheme is introduced requiring all technicians to have obtained the Level 2 Award in Pest Management or equivalent and be registered annually with an independently assessed CPD scheme such as BASIS PROMPT in order to use SGARs. In addition to this training and CPD scheme membership, those using SGARs in open areas would require Wildlife Aware Accreditation. This would be brought in over time (see below).

‘Licensing’ would require:

- Agreed definition of professional use. This has been defined in the CEN Pest Management Services Requirements & Competencies prEN 16636 (see above)
- Suppliers to ensure professional use products were only sold to those who can be defined as professional users (ie qualified and on a recognised CPD scheme see above)
- Labels to state that the products are for use by professionals (as defined above)
- Product sales (including internet) to be ‘policed’ to ensure sellers are asking the correct questions and selling in the proper manner
- Guidance documentation for anyone selling professional use SGARs (including Internet sales)
- Implementation of “mystery shopper” procedures. These need to be agreed with manufacturers, suppliers and HSE, and the support of enforcement for those organisations which are in breach.
- Support from HSE to deliver this process, including the establishment of whistleblowing procedure, point of contact etc.
- Prosecution under relevant legislation

In addition a documented Environmental Assessment (a template is to be provided in the open space best practice document) is carried out prior to carrying out any treatment involving the use of rodenticides on every occasion in open areas. Pest Controllers are already used to producing site specific paperwork such as risk assessments and treatment reports so providing site specific environmental risk assess-
ments should not be too onerous. Environmental risk assessments were originally developed in 2007 by Killgerm Chemicals in conjunction with Natural England and training providers such as Killgerm, the BPCA and others have been training pest control technicians on their use to date.

To ensure compliance with the stewardship proposal BASIS can oversee the scheme and carry out audits of those selling SGARs similar to those currently in place for agricultural pesticide stores and distributors of aluminium phosphide (BASIS Small Stores Scheme)

As part of the stewardship proposal the professional pest control sector will produce a specific best practice guide on SGAR use in open areas, embracing in one document the best practices outlined in the various industry publications.

Product Labelling
This sector believes there is an urgent need for reassessment of the current labels to simplify the instructions while emphasising the key points. There is still a need for detailed instructions for use but it is recommended this is in the form of suitable codes of practice that are enforceable in law. Our recommendation is that professional use only products should be much more clearly marked as such at present.

Point of Sale Conditions
In our sector supply of SGARs is well policed by long standing voluntary product stewardship schemes implemented by the suppliers. As an example responsible suppliers ask new customers for proof of training before they are permitted to purchase SGARs. New customers submit training certificates, which are then validated by suitably qualified technical staff by referring to a list of ‘approved’ certificates. Certain certificates have been ‘approved’ by technical staff based on suitability of course content and trainers. Proof of training for existing customers is retained on a database, allowing them to continue to purchase SGARs. However we have concerns with supply outlets outside our sector (including internet sales). We recognise the difficulties for retail outlets so suggest the development of a more robust system of identification (i.e. photograph ID scheme such as BASIS PROMPT or similar). These systems should be in line with the currently operating voluntary stewardship schemes and should include controls such as:

- Check that the customer is known to you.
- If not, confirm the identity and qualifications of the person making the purchase.

The sector’s recommendation for face to face product sales of SGARs is that if sold in large pack sizes the product should require the intervention of a member of staff before it can be purchased e.g. locked down or in a secure area away from the sales floor.

Guidance / Codes of Practice
There exists many guidance and best practice documents regarding the use of SGARs, although it is acknowledged that the safe use of SGARs in open areas is not covered by one guidance document alone but features in several documents under various titles.

We are therefore in the process of producing specific guidance and a best practice document for the safe use of SGARs in open areas which will address issues such as:

- The potential risk to public health from rodent disease vectors and the need for rodent control in open areas.
- The selection of anticoagulant rodenticides, correct formulation and use.
- The need for and recording of an Environmental Assessment prior to treatment in open areas (a template for recording Environmental Assessments will be provided as an Appendix)
- Recommended baiting techniques
- Requirements to search for rodent bodies and the removal of all rodenticide on completion for safe disposal.
- The recommended maximum time period rodenticide bait is to be used in open areas before referral, if control has not been achieved
- The need to minimise the use of anticoagulant rodenticides in open areas through environmental management recommendations
- General public and non-target safety considerations to be observed during the baiting programme.
Other Accreditation / Licensing Schemes
This sector recommends the roll-out of the BASIS Store Inspection Scheme to UK distributors of SGARs, including internet sales.

User Training / Competence Assurance
The industry recognised qualification for the professional pest control sector is the RSPH/BPCA Royal Society for Public Health / British Pest Control Association Level 2 Award in Pest Management. To achieve this standard, prospective pest control technicians are required to attend a classroom based theoretical course, comprising 72 guided learning hours (Ofqual qualification number 500/8797/6) and pass a final written examination.

The syllabus focuses specifically on the public health aspects of pest management comprises three Units:

Unit 1: Vertebrate Pest Management
Unit 2: Invertebrate Pest Management
Unit 3: Health, Safety & Legal Aspects of Pest Management

In 2013 a total of 600 candidates sat the RSPH/BPCA pest control examinations with 368 candidates out of 497 successfully passing the Level 2 Pest Management Award (74%) and 106 candidates passing the Level 2 Certificate (87%).

Other acceptable entry-level qualifications include the RSPH/BPCA Level 2 Certificate in Pest Management, The Royal Society of Health Pest Control Certificate or The British Pest Control Association (BPCA) Diploma, Part 1 or equivalents.

We would expect HSE through their Stewardship Initiative to work with the Professional Pest Control Sector to validate alternative acceptable qualifications.

Other pest management qualifications are also available from the RSPH and BPCA; and other training providers.

Level 2 Certificate in Pest Management - Ofqual 500/8978/X
Level 2 Diploma in Pest Management – Ofqual 600/7800/5
Level 3 Diploma in Pest Management - Ofqual 500/9590/0

Copies of the syllabus for the Level 2 Award, Certificate and Diploma together with the Level 3 Diploma in Pest Management can be downloaded from the RSPH website at:


BPCA’s in-house qualifications are recognised as being industry standard higher-level qualifications. These are:

- Accredited Technician in Pest Control
- Field Biologist

To demonstrate the industry’s commitment to responsible professional pest management the BPCA now requires all servicing company members to have those staff who carry out the control of pest species attain the Level 2 qualification as entry criteria for membership.

The NPTA require an assessed “certificate of competence” from prospective members who use professional use rodenticides.

In addition the BPCA require that these employees must be registered on a recognised independent Continuing Professional Development scheme such as BASIS PROMPT.

The NPTA recommend this scheme to their members.

This Continuing Professional Development scheme (CPD) requires members to have achieved a total of 20 CPD points annually in order to remain on the register across five categories: Environment, Application Practice, Personal Development, Pest Control and Health & Safety.

To be eligible for BASIS PROMPT membership candidates must be able to demonstrate they have achieved the RSPH Level 2 Award or equivalent (see above).

BASIS (Registration) Ltd. was originally formed to promote professional standards in the agricultural sector, and is known and well respected as an independent organisation with a number of government departments.

Current membership of the PROMPT scheme is 2124 (Oct 13)

Further details of the BASIS PROMPT scheme can be obtained from the BASIS website at http://basispest-control.co.uk/
BPCA and other training providers have adapted their RSPH/BPCA Level 2 course to ensure Unit 1 (Vertebrate Control) encompasses some of the key elements of the ‘Wildlife Aware’ course, particularly environmental risk assessments when using rodenticides and minimising risks to non-target species. The sector has agreed that the full Wildlife Aware course is required for use of SGARs in ‘open areas’.

**Monitoring Requirements**
Monitoring data will be made available annually from the industry and independent organisations such as RSPH, BPCA and BASIS on the number of:

- Individuals passing the Level 2 Award examination,
- the number of individuals registered on the BASIS PROMPT scheme
- Individuals on other independently-assessed CPD schemes.
- Companies in membership of the trade associations
- Pro-active monitoring of SGAR resides in wildlife by regulatory authorities.

We support the value of the current PBMS and WIIS. These demonstrate that under approved use there are very few incidents. Specifically, WIIS figures from 1993 to 2011 show that there are very few incidents if compounds are used properly – only 3% of incidents in total and none of the incidents in the last 3 years of said data have been attributed to ‘approved use’, which is how this sector operates.

**Extension of Use Arrangements**
Our sector recommends that where necessary the open area use of SGARs be permitted within the provisions of the SGARs stewardship scheme (currently being developed by this sector group).

**Enforcement (including voluntary initiatives).**
Our sector recommends:

- SGAR manufacturers provide documentation for professional users to show to their clients explaining the changes to SGAR use and the Stewardship Scheme.
- Mention of the requirement for compliance with the Stewardship Scheme on all SGAR product labels
- Trade Bodies to audit servicing members against the requirements of the Stewardship scheme and take action against offenders
- CPD schemes to act appropriately and take sanction against those who do not meet the membership criteria.
- Creation of a whistleblowing procedure supported by HSE
- Culminating in an industry-managed personal registration scheme for SGAR users, (for example the BASIS PROMPT Photo ID card)

**Oversight Arrangements**
This sector supports this proposal.

**Authorisation Conditions**
That any approval holders must be members of CRRU and thus sign up to the Stewardship Scheme.

**Developing the Materials and Guidance to Support Stewardship**
The main materials to roll out Stewardship in the professional pest control sector have been developed and published over a number of years.

As part of the stewardship proposal the professional pest control sector will produce an additional specific best practice guide on baiting rodents in open areas embracing in one document the best practices outlined in the various industry publications and supporting documentation for the clients.

**Success Criteria and Assessing Effectiveness**
1. Increase in registrations on recognised independent CPD schemes such as BASIS PROMPT.
2. Knowledge, Attitudes and Practice Surveys proposed by CRRU will measure the extent to which the Stewardship scheme messages are getting through to technicians
3. Increase in numbers qualified to Level 2 or equivalent
4. Increase in Membership of trade bodies
5. Reductions in SGAR residues
6. Reduced numbers of non-target poisonings (see PBMS and WIIS)

**Managing the Risks**
The HSE identified, in paragraph 13 of its paper of 9/8/13, some potential risks which might result in reduced effectiveness of the Stewardship Scheme. We comment on each of these below:

a. Users don’t comply with stewardship requirements
   Risk is low; the majority will comply. Our sector has a long history of prior compliance.
b. Lack of willingness to pay costs required by stewardship. Costs should be minimised because of the high level of prior training, uptake of CPD scheme registration and willingness to develop professionally.

c. Loses focus and direction because of lack of ownership. Strong ownership already by industry bodies. The industry will raise awareness of the scheme through seminars, marketing, trade publications and via the supply chain. There is a history of success in this area (e.g. RAMPS scheme for Aluminium Phosphide, recognised by HSE). RAMPS shows that elements of the industry e.g. suppliers, have already come together with government departments, BASIS, trade associations and successfully delivered an excellent stewardship scheme for Aluminium phosphide products for vertebrate control. Elements of the stewardship scheme include training, point of sale controls, codes of practice for stockists and users.

d. Stewardship results in unacceptable risk to non-target species. Unlikely result given the previous successes within our sector (see WIIS DATA on approved use).

e. Other: The Sector is concerned at the suggested proposal to display prominent signs informing the public that rodent baits have been laid as part of a control programme. Drawing the attention of the public to the location of bait stations will potentially encourage vandalism and tampering of bait stations increasing the risk of exposure of contents to the environment and non-target species, particularly in urban inner city locations.

Confirmation is also sought that the definition of “in and around buildings” will apply to the control of rats in drains and highway sewers including storm water overflows.

Implementation of the above industry stewardship proposals, together with the drafting and publication of the best practice guidance document for baiting in open areas will in the view of the professional pest control sector, ensure maximum protection for non-target animals and the environment. It will also result in the increased competence of technicians resulting from additional training and qualifications.

In addition this sector will ensure compliance through self policing and implementation of a “whistle blowing” policy whilst working towards an industry managed personal registration scheme.

Following acceptance of these proposals by HSE, an industry-led awareness campaign will be launched nationwide to publicise the stewardship scheme and training qualification requirements necessary for compliance.

A lead-in period of three years for all technicians to obtain the necessary training and qualifications will be required.

PROFESSIONAL PEST CONTROL SECTOR
FEBRUARY 2014
APPENDIX 1
Members of the Professional Pest Control Sector Group

<table>
<thead>
<tr>
<th>Name</th>
<th>Position/Role and Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Oldbury*</td>
<td>Secretary (Chartered Institute for Environmental Health National Pest Advisory Panel (CIEH-NPAP)) Representing all Local Authorities in England, Wales and N Ireland</td>
</tr>
<tr>
<td>Simon Forrester</td>
<td>Chief Executive (British Pest Control Association (BPCA)) representing 3,500 technicians across the UK</td>
</tr>
<tr>
<td>Iain Turner</td>
<td>Chairman (National Pest Technician Association (NPTA)) representing 2,000 technicians across the UK</td>
</tr>
<tr>
<td>Rob Simpson</td>
<td>Managing Director (BASIS Registration Ltd (BASIS PROMPT)) Independent Professional Development Register with 2,124 members (Oct 2013)</td>
</tr>
<tr>
<td>Dr Richard Burton</td>
<td>Head of Qualification Development (Royal Society for Public Health Examinations body: 2013 Examination results L2 Pest Management Award 368 candidates out of 497 passed (74%) L2 Certificate 106 candidates passed (87%)</td>
</tr>
<tr>
<td>Matthew Davies</td>
<td>Technical Department (Killgerm Chemicals Pesticide Manufacturer/Supplier and Training Provider)</td>
</tr>
<tr>
<td>Paul Charlson</td>
<td>Commercial, Safety &amp; Licensing Manager (West Lancashire Borough Council CIEH NPAP member)</td>
</tr>
<tr>
<td>Richard Moseley</td>
<td>Technical Manager (British Pest Control Association (BPCA))</td>
</tr>
<tr>
<td>Adam Hawley</td>
<td>Vice Chairman (National Pest Technician Association (NPTA))</td>
</tr>
</tbody>
</table>

*Sector Group Chairman

APPENDIX 2
Existing Codes of Practice on SGAR Use

- BPCA: Safe Use of Anticoagulant Rodenticides by Professional Users
- CIEH: A Guide to Carrying out an Environmental Assessment Prior to the Use of Rodenticides
- CIEH: National Sewer Baiting Protocol
- CIEH: Pest Control Procedures Manual: Rodents
- CIEH: Review of the Use of Bait Boxes
- CRRU: Code of Practice for Rodenticide Use
- CSL/Fera: The Control of Rats with Rodenticides: A Complete Guide to Best Practice
- CRRU: Environmental Assessment When Using Anticoagulant Rodenticides
- DEFRA: Code of Practice for the Prevention and Control of Rat Infestation at Poultry Farms
- CEFIC/EBPF: Guideline on Best Practice Using Rodenticide Baits as Biocides in the EU
- KILLGERM: Guide to Environmental Assessments when using Rodenticides
- HSE: Urban Rodent Control and Safe Use of Anticoagulant Rodenticides by Professional Users
- HSE: Safe Use of Rodenticides on Farms and Holdings
4. Proposals for the Stewardship of the Second-generation Anticoagulant Rodenticides (SGARs) in the UK from the Supplier Sector Group

1 Introduction
These proposals are prepared by the Supplier Sector Group of the UK Stewardship Regime for SGARs (second-generation anticoagulant rodenticides). Membership of this Sector Group comprises companies who hold approvals from the Health and Safety Executive (HSE), to place on the market in the UK rodenticide products containing SGARs. Many, but not all, of the companies within the Group have been involved in the stewardship of SGARs for many years through their participation in the Campaign for Responsible Rodenticide Use (CRRU). A list of the companies involved in the Group, and the names of their nominated representatives, is given in Appendix 1. A list of current SGAR UK product approval holders who are neither CRRU member companies nor have so far participated actively in the development of the UK Stewardship Regime is given in Appendix 2. CRRU will approach all these companies with an invitation to join CRRU and to participate in the Sector Group. Progress in this will be reported at the meeting between the Groups and the Oversight Group on 4th March 2014 in York.

All of the companies involved in the Group place their approved products onto the UK market across various market sectors, including the agriculture, professional pest control, local authority, gamekeeping and amateur sectors, although the importance of the different sectors to their respective businesses may vary. In order to comply with competition law requirements it is an express condition of membership of the Group that members may not discuss, nor share any information on, among other things, market shares, sales volumes and sales values. Therefore, the Group possesses no quantitative information about any aspect of the UK rodenticides market. However, the members of the Group have conservatively estimated that between them they account for more than 90% of the UK market in rodenticide products containing SGARs, across all sectors, in terms of quantities of products sold. There may be a reasonable expectation, therefore, that any stewardship measures proposed and implemented by the member companies of the Group will have an important impact on the use of products containing SGARs in the UK.

2 Background
Unless they are effectively managed, rodent infestations, specifically Norway rats and house mice, have the potential to affect adversely a wide range of human activities in the UK. They are a significant threat to the health, well-being and prosperity in all UK communities, both in rural and in urban areas. The diseases they harbour and transmit to humans, companion animals and farm livestock, the foods and feedstuffs they consume and spoil with their filth and the damage they do to homes, possessions and commercial enterprises is widely appreciated and comprehensively documented. As a consequence of this, statutory requirements to control rodents fall upon those, including both individuals and private and governmental organisations, who occupy property and land and have legal responsibility for it. The principle applicable legal instrument is the Prevention of Damage by Pests Act (1949).

SGARs have been in wide use in the UK since their introduction in the late 1970s. Government surveys showed that farmers on arable farms and those growing crops for fodder, together with use by local authorities, resulted in the application of an average of about 1,300 tonnes of baits containing SGARs per annum during the period 1988 to 2000. These estimates do not include uses, among others, by those applying SGARs in animal husbandry, commercial professional pest controllers, gamekeepers and amateurs. Applications using about the same volumes of products have probably occurred from that period to date. The SGAR active substances used in the UK are predominantly difethialone and difencoumarin because of historical restrictions on the outdoor use of brodifacoum, difethialone and flocoumafen.

The Wildlife Incident Investigation Scheme (WIIS)3 is a government-run post-registration monitoring programme that seeks to discover the circumstances of death of wildlife and companion animals which are suspected to have been caused by pesticides. Examination of almost 1,800 WIIS incidents involving vertebrate pesticides, during the period 1993 to 2011, has shown that very few incidents (<3%) are caused when these active substances are used according to their label obligations.4 This shows that, in spite of the high acute mammalian and avian toxicities of many of these substances, mitigation measures conventionally adopted in UK during application generally serve to prevent significant unacceptable acute impacts.

On a broader scale, wildlife contamination with SGARs was first studies comprehensively in samples of barn owls examined within the Predatory Birds Monitoring Scheme. The birds’ deaths were the

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result of a variety of causes but were predominantly due to collisions with road traffic. Subsequent examination of samples of many other species of wildlife, including red kites, kestrels, buzzards, polecats, stoats, weasels and hedgehogs, has shown that a high proportion of individuals in populations of all these species carry residues of SGARs, albeit at very low levels for the most part. The varied habitats occupied by these species, and their different food habits, appear to indicate widespread contamination of UK food webs with SGARs. It is unlikely that this scope of contamination is caused only by exposure to poisoned target animals and it seems probable that much of this exposure is via the contamination of wild small mammals, including field mice and voles. It is a point of fact, however, that surveys and censuses conducted in the UK by the British Trust for Ornithology have shown that populations of some of the most exposed species of predatory and scavenging birds are actually thriving, in spite of this widespread and unwanted contamination.

The Campaign for Responsible Rodenticide Use (CRRU) was established in 2005 by the rodenticide industry in response to growing knowledge of the scope of wildlife contamination. The purpose of CRRU is to make all those who use rodenticides aware of the causes of wildlife contamination and the methods of rodenticide application that should be adopted to minimise it. CRRU welcomes the added impetus to its work that the implementation of a comprehensive UK SGAR Stewardship Regime will bring about. CRRU is determined to work with all willing stakeholders to put into practice all reasonable and relevant measures for the mitigation of unwanted exposure of non-target animals to SGARs in the UK. Much has already been done, but more remains to be done.

In particular CRRU has agreed to adopt the fundamental co-ordination role in the development and implementation of the UK SGAR Stewardship Regime. CRRU, and the UK SGAR Stewardship Regime Supplier Sector Group derived from it, will carry out the actions given in the following sections of this document when the proposals have been examined and found to be appropriate by relevant government departments with policy responsibilities for biocides, public health, animal health, environment and agriculture.

3 Guiding Principles
CRRU and the SGAR Stewardship Supplier Sector fully support the guiding principles of the Stewardship Regime set out in the HSE report of the 9th August 20133 and reproduced here.

c. Principle 3: Protection of commercial interests (including property).
e. Principle 5: Retaining effectiveness of SGAR treatments, managing resistance.

These principles are reproduced here in no particular order. However, the protection of public health is considered to be of paramount importance.

While, recognising the significant influence of many other Stakeholders, the Supplier Sector Group accepts responsibility for products that it manufacturers and supplies through the life-span set out in the HSE paper as follows:


4. Actions to be Conducted by CRRU in the UK SGAR Stewardship Regime
a. Co-ordinate the UK SGAR Stewardship Regime
CRRU will take the lead to ensure the co-ordination of the SGAR Stewardship Regime across all SGAR user groups, including professional pest controllers, local authorities, agriculture users, gamekeepers and amateurs.

CRRU has facilitated the establishment of a structure (Figure 1) for the delivery of the Regime comprising four Sector Groups, namely: 1. Agriculture, 2. Gamekeeping, 3. Professional Pest Control and Local Authorities, 4. Suppliers (including Amateur Users). A Steering Group, comprising the Chairs and selected representatives from each of the Sector Groups will be inaugurated. The Chair of CRRU will deliver CRRU’s co-ordination role by Chairing the Steering Group. A government Oversight Group will provide direction and monitor progress. The Oversight Group will comprise

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representatives of the HSE, Department of Health (DH), the Department for Environment, Food and Rural Affairs (Defra) and, if considered appropriate, representatives of any other agencies and organisations that the Oversight Group may see fit to invite to join the Group.

CRRU has conducted a series of meetings with all Sector Groups. A first meeting with each Group was held, including HSE representation, to understand concerns, gather ideas and solicit support. A second meeting was then held to appoint a Group Chair, to develop detailed Stewardship proposals for the Sector and to agree a process in which these proposals are to be put before the governmental Oversight Group for consideration. The agencies providing Sector Group Chairs have made a commitment to allocate the necessary funding resources to provide this facility for the Regime.

CRRU has participated in meetings with HSE, and other government departments, to obtain guidance and report progress.

CRRU will participate, when necessary, in Sector Group meetings.

b. Report Progress to the Oversight Group
CRRU will organise and lead regular meetings of the SGAR Stewardship Steering Group in order to monitor progress and ensure the timely and comprehensive implementation of the Stewardship Regime. Such meetings will be held at least twice each year and minutes will be provided to the Oversight Group.

In communication with appropriate government departments and at a frequency to be determined by the Oversight Group, CRRU will facilitate and participate in meetings between the Steering Group and the Oversight Group. These meetings will provide the Oversight Group with detailed insight into the development and delivery of the Regime across all user sectors.

c. Co-ordinate Monitoring
CRRU will co-ordinate those aspects of monitoring of the implementation and effectiveness of the Stewardship Regime that may be reasonably conducted by CRRU and the Stakeholder Groups.

d. Guidance and Production of Materials for Sector Groups
CRRU has considerable experience in the development and promulgation of SGAR stewardship. As and when requested, CRRU will provide detailed guidance on appropriate stewardship measures, including the provision of published and electronic materials, including Best Practice Guidelines and other collateral, for all Stakeholders Groups.

e. Stewardship Regime “Supplier” Sector Group
The Stewardship Regime Supplier Sector Group will be established to deliver all aspects of SGAR stewardship within the areas controlled by its member companies. These companies supply SGAR products into all user sectors and therefore can influence all users in the way that the apply SGARs. This Sector Group will not be restricted to CRRU member companies. However, all companies participating in the Group will be invited to join the CRRU Board (Appendix I and Appendix II).

f. Stewardship Regime Mitigation Measures to be Developed for Amateur Users
A very large proportion of all SGAR products sold through amateur sector channel partners is manufactured by the members of the Supplier Sector Group. Therefore, the Supplier Sector Group will take the lead in developing stewardship proposals and introducing stewardship measures, in collaboration with relevant channel partners, to the amateur user sector. It should be noted, however, that some amateurs obtain products through internet sales that are not controlled by Supplier Sector group members.

5 Elements of Supplier Sector Group SGAR Stewardship
General
The Supplier Sector Group comprises companies that hold regulatory approvals for the manufacture, distribution and sale of SGAR products to all UK market sectors. Therefore, the actions of this Sector Group are able to have a broad impact on SGAR user practices throughout the UK.

This Sector Group will engage with the other Sector Groups in order to ensure that Stewardship proposals are compatible across all sectors. The members of this Group have invested significant financial resources in obtaining and supporting product authorisations. They therefore have an interest in participating in the SGAR Stewardship Regime to establish acceptable SGAR use patterns that permit a stable and responsible market for these products in the UK.

The framework for the proposals for SGAR
Stewardship to be implemented by the Supplier Sector Group, and set out below, is derived from the paper published by HSE on 9th August 2013.9

Stewardship Proposals

a. Product Labelling
Printed text on product labels is agreed between applicants for the product approvals and HSE. Currently, product labels are often overly crowded with text because the availability of space on packs is limited, especially on small product packs intended for the amateur market. Furthermore, there is little consistency of labelling among packs containing similar products which employ the same active ingredient. Text may be overly complicated and poorly comprehensible to many users.

Responsible use will be promoted by improved labelling of SGAR products. The Supplier Sector Group will work in collaboration among its member companies and in conjunction with HSE, to provide labels that are clear, consistent and concise. Agreed texts will be introduced when new labels are issued.

The Sector Group will:

• Comply with all labelling requirements determined by HSE in discussion with applicants.

• Where applicable, provide consistent advice to users on product labels, especially those that contain similar formulations and active substances and therefore present similar risks.

• Specifically for the amateur market, the Sector Group will devise and agree with HSE a simplified product label text intended to provide clear guidance to consumers in words that are comprehensible to them. It is proposed that that this label will be included, where appropriate, on all amateur SGAR packs.

• Develop and employ label language that accurately reflects risks and transmits clear messages regarding required measures to mitigate risks.

• On packs that are restricted for sale only to professional users, prominently display this information so as to deter sale to and use by non-professionals.

• Work with other stakeholders to develop clear and concise codes of practice (see below) which will be referred to prominently on product labels. The purpose of this is to provide important additional information about responsible use that cannot be presented on product labels.

• Carry the CRRU logo on product labels with a reference to the CRRU website, wherein more information on responsible use can be found.

• Work with specialists to assess the feasibility and value of Quick Response (QR) code technology in relation to SGAR product labels to see if it provides an opportunity for the transmission of more detailed responsible use information. QR code technology is increasing used as a platform for rapid provision of information using mobile phone and other receiving equipment. This technology may be particularly useful in the amateur market sector.

b. Point of Sale Conditions
The Supplier Sector Group is able to influence point of sale conditions through arrangements with distributors, and other channel partners, who operate more closely in the supply chain to those who purchase and use SGARs.

A principle area for stewardship improvement is the purchase and use by amateurs of products that are approved by HSE only for use by professionals. Packs intended for purchase by professionals and amateurs differ in a number of characteristics; the main difference being the quantity of rodenticide they contain. Amateurs require less rodenticide bait because the infestations they treat are generally smaller and are restricted to their own premises. Amateurs are permitted to purchase only small packs because they are assumed to have less competence in safe and responsible use and are less likely to implement effective risk mitigation.

The availability of only small amounts of SGAR products to them acts to protect human and animal health and the environment. For these reasons the Sector Group will support and implement effective measures to restrict the sale of professional-only SGAR products to amateurs.

The point of sale is where a direct interface between SGAR suppliers and purchasers occurs. This provides an opportunity for the provision of information about stewardship, responsible use and appropriate risk mitigation measures.

The Sector Group will:

• Support HSE in any effort to strengthen legislation that will make it illegal to sell restricted professional products to those who cannot demonstrate adequate competence in their use.

• Strengthen measures that prevent sale to amateurs of products restricted to professional use. Some of the Sector Group companies already implement measures at point of sale that provide approval holders with assurance that purchasers are bona fide professional users. During 2014, and within three months of the Oversight Group endorsing these proposals, a protocol will be developed by the Sector Group to be implemented by its members, and to be made more widely available, to insure that those who purchase SGAR products for professionals are themselves competent professional users or are known to the distributor to be purchasing products solely those who are competent in their use.

• Work with channel partners during 2014, and within three months of the Oversight Group endorsing these proposals, to ensure that products restricted to use by professionals are positioned in stores so as not to promote purchase by amateurs. Clear labelling of such professional products will help to prevent purchase by amateurs (see above) but clear signage at point of sale is also required. It is also proposed that amateur products should be displayed at points-of-sale in different areas to professional products so that a distinction is made between the two.

• Develop and provide informational materials for those who provide customer support at points-of-sale. This material would be intended to make staff at outlets which supply SGAR products more aware of the issue of non-target exposure and mitigation measures appropriate to prevent it. Of particular significance in this regard may be Specially Qualified Persons (SQPs), and other similar staff, that are available to provide information to customers at points of sale. This material will be developed in 2014, and within three months of the Oversight Group endorsing these proposals, for supply to distributors in 2015.

• Develop and provide at point of sale informational material for distribution to SGAR purchasers to promote stewardship. This material will be developed for specific user groups, including amateurs, and provided in 2015.

c. Guidance/Codes of Practice

Codes of Practice, and other guidance documents, provide essential information to users of SGARs. Use practices vary significantly among different SGAR user groups, as do the levels of knowledge and understanding of users. Therefore, different Codes of Practice may be required which are aimed specifically at use scenarios and user categories. CRRU, and many other agencies and organisations, have published Codes of Practice which are directed at a wide range of SGAR users.

• The core SGAR use scenario, that of “in and around buildings” is very well supported by current Codes of Practice. Of particular significance is the most recent best practice guideline published by the European Chemical Industry Council (Cefic). Useful guidelines were also provided by HSE for two significant UK SGAR user groups, professional pest controllers and farmers. However, these now need to be updated in line with new conditions of authorisation for SGAR products in the UK.

In conjunction with all relevant stakeholders, CRRU has recently published a guidance document for gamekeepers. This is of particular significance because it provides guidance for safe use in a key “open area” application of SGAR products. It is considered that such “open area” uses may require particular care in the application of SGARs in order to reduce risk to non-target animals, especially wildlife. Two other codes are needed that provide best practice guidance for “open area” SGAR uses for the specific use patterns adopted by (1) farmers and other workers in agriculture and (2) professional pest controllers and local authorities.

Product labels are increasingly crowded with text and difficult to read (see above). Published Codes of Practice are capable of providing, in a simple and comprehensible way, more detailed information than can be accommodated on product labels. Consideration should be given to proposals from other Sector Groups that would include on product labels a requirement that applications of the product in question are legal only when made in compliance with specific Codes of Practice.

The Sector Group will:

Within three months of the Oversight Group endorsing these proposals, compile a comprehensive list of up-to-date and applicable guidelines and codes of practice on SGAR use and make the documents widely and easily available to all users groups.

If requested, collaborate with specialists from HSE to update as appropriate the published HSE best practice guidelines involved with SGAR use for professional pest controllers and farmers.

Lead the development of additional codes of practice and guidance documents, where required, in collaboration with applicable representatives of use groups. Specifically, the Sector group will work with: (1) those involved with “open area” SGAR applications to protect the health and well-being of livestock and (2) with professional pest controllers and local authorities making “open area” applications to protect human health in public spaces. This work will be conducted in 2014, and within three months of the Oversight Group endorsing these proposals.

Develop and offer at point-of-sale leaflets and pamphlets that are devised specifically for instruction of amateur users.

Support the Competent Authority if it chooses to make compliance with specific Codes of Practice

d. Other Accreditation / Licensing Schemes

Various accreditation schemes operated by a wide range of stakeholders exert a strong influence on the use of SGARs in the UK. Some stakeholders, who are customers for rodent control services, apply pest control by requiring contractors to adopt at treated sites standards set by such organisations as the British Retail Consortium and AIB International. Other organisations, including some supermarket chains, apply their own standards which may be more prescriptive than those of BRC and AIB. In agriculture, a variety of agencies operate assurance schemes for agricultural production facilities, the most comprehensive of which is Red Tractor.

The majority of these standards do not specify a detailed approach to rodenticide application at accredited sites. Rather they require a comprehensive and systematic approach including elements of general hygiene, management of structural integrity, biosecurity, surveillance, reporting, application of appropriate control measures and auditing against agreed standards. However, those who implement audits frequently interpret standards for rodent control as a requirement for permanent deployment of tamper-resistant bait stations containing SGARs. Recent published guidelines for the use of SGARs as biocides in the European Union state that it is not Best Practice to use live SGAR baits as monitoring tools in the absence of extant rodent infestations. Alternative measures to replace permanent baiting are advocated in this document.

The Sector Group will:

- Work with agencies involved in accreditation and auditing for rodent pest management in the UK to explain the potential implications of the permanent deployment of SGARs at treated sites in terms of wildlife exposure and contamination. This work will begin within three months of the Oversight Group endorsing these proposals.
- Work with those involved to develop and implement alternative practical schemes for monitoring rodent pest infestations that do not involve permanent baiting with SGARs.
- Request that published auditing standards are amended to take into consideration with possible consequences of permanent baiting for wildlife contamination in the UK.

Accreditation of professional pest controllers is implemented in the UK through a voluntary register managed by BASIS (Registration) Limited. The register is called BASIS-PROMPT. Further explanations of the operation of the scheme are provided in the SGAR Stewardship Regime proposal report from the Professional Pest Control and Local Authority Sector Group. Criteria for BASIS-PROMPT registration include a suitable qualification and a requirement for Continuous Professional Development. The BASIS-PROMPT Register will provide a suitable framework for the licensing of professional pest controllers in the UK.

The Sector Group will:

- Work with professional pest control trade associations, and other stakeholder organisations, to promote voluntary membership of BASIS-PROMPT among all professional pest control technicians.

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• Actively promote BASIS-PROMPT among those who are customers for professional rodent control services.

• Support a regulatory initiative, should one emerge, to make membership by UK professional pest control technicians of BASIS-PROMPT a requirement within a formal scheme for licensing of professional pest control technicians.

e. User Training / Competence Assurance

Training is an essential component of the development and implementation of the UK SGAR Stewardship Regime. Training courses operated by key stakeholder agencies and attended by users will play an important role in raising awareness of wildlife exposure to and contamination with SGARs, explanation of the biological processes involved and the promotion of effective mitigation measures. Although important in themselves, one-off training courses must be supplemented by schemes of continuous professional development (CPD) in which those who purchase and apply SGARs as ‘professional users’ can maintain and enhance continuously their professional competence. Among SGAR user groups, some element of formal training is inappropriate only for amateurs. A range of training vehicles is available, including conventional face-to-face training and on-line training.

A very wide range of training courses covering rodent pest control is currently available. Some courses provide professional qualifications and are examined by bodies such as City and Guilds and the Royal Society of Public Health. Other courses are intended merely to provide relevant and up-to-date information to enhance competence and do not lead to a formal award of qualification. Usually courses are directed at specific user groups.

One user sector that is well-served with courses and qualifications is the professional pest control sector. For example, possession of a qualification after attendance at one of the following courses is a prerequisite of BASIS-PROMPT registration and membership of one of the relevant trade associations:

• Royal Society of Public Health (RSPH)/ British Pest Control Association (BPCA) Level 2 Award or Level 2 Certificate in pest control or above.

• Royal Society of Health Pest Control Certificate.

• British Pest Control Association (BPCA) Diploma, Part I or II.

Training in rodent pest management for those employed in the farming sector is available from several agencies including LANTRA. LANTRA courses are provided in a range of training facilities country-wide.

Members of the Sector Group, including Barrettine Environmental Health, Killgerm Chemicals and SX Environmental provide training courses, both via their own training functions and through association with other training agencies. These are mainly aimed at the professional pest control sector. CRRU has developed several training courses. These are aimed at making participants aware of wildlife exposure to SGARs and the measures to adopt to avoid it:

• A course has been developed, and distributed to all the colleges of the Land-Based Colleges National Consortium, to be given to students taking courses in land management, farming, game rearing, wildlife conservation and wildlife management.

• A course has been developed by CRRU, in collaboration with key stakeholders from the gamekeeping user sector. This course specifically promotes best practice by gamekeepers in SGAR uses in ‘open areas’, as described in the relevant CRRU guideline.19

• CRRU operates an accreditation scheme for competent professional pest control technicians entitled “Wildlife Aware”. This one-day course is intended to provide advanced understanding about phenomena associated with wildlife exposure and contamination. The course is examined independently by BASIS (Registration) Limited and this agency maintains the register of accredited technicians. There are currently 193 Wildlife Aware Accredited Technicians. It is proposed by the Professional Pest Control and Local Authority Sector Group that possession of Wildlife Aware Accreditation should be a prerequisite when SGARs are used by professionals in ‘open areas’ (see proposals from Professional Pest Control and Local Authority Sector Group).

• The “Wildlife Aware” programme will be adapted in simplified format for provision of training to SQPs, and other point-of-sale staff, so that these

personnel are able to provide better advice on responsible use to minimise wildlife exposure. This course will be developed in 2014, with roll out in 2015. It will be linked to a suitable qualifications body that is active in this sector. This body will oversee the examination process and keep a register of personnel who hold the qualification.

Professional competence, and raising standards of professional competence, is an important aspect of SGAR stewardship. It is the view of the Supplier Sector Group that those who purchase and use SGAR products restricted for use only by professionals should be required to demonstrate competence at the point of purchase. Such competence is demonstrated by the possession of a relevant qualification in rodent pest management. If purchases are made by third parties on behalf of professional users, a documented process should be in place to demonstrate that only appropriately competent personnel will use the purchased products.

Through its association with CRRU, the Sector Group will:

- Continue to promote and provide Wildlife Aware training courses throughout the UK via a network of BASIS-approved Wildlife Aware trainers.
- Continue to promote Wildlife Aware Accredited Technicians among customers for rodent control services.
- Support any training provider who wishes to use any CRRU materials in the development of training courses aimed at promoting SGAR stewardship.
- Collaborate with training providers to develop and provide innovative training courses aimed at all user groups which seek to increase understanding of how wildlife exposure to SGARs comes about and how to prevent it.

Members of the Sector Group will:

- Provide training courses directly to SGAR users to increase professional competence through existing training programmes.

f. Monitoring Requirements
When the UK SGAR Stewardship Regime is under implementation it will be essential to monitor progress against a series of benchmarks or Key Performance Indicators (KPIs). It is anticipated that these KPIs will be discussed and agreed in meetings held in the coming months between the governmental Oversight Group and the representatives of the four Sector Groups. Benchmarks in several key areas will be developed.

(i) KPI 1- Contamination of Wildlife

A principle concern that has driven the requirement for SGAR stewardship in the UK is the known scope of contamination of wildlife populations. A number of predatory and scavenging mammalian and bird species have been found to be affected, suggesting several pathways for contamination. One obvious pathway is the consumption of dead and dying target rodents. However, another pathway, that of consumption of dead and dying non-target small mammals such as mice and voles, is strongly suggested by the food habits of some exposed species, such as barn owls, tawny owls and kestrels.

The contamination of UK wildlife with SGARs has been monitored for many years by the Predatory Birds Monitoring Scheme (PBMS). A long-term data set on a sentinel species, the barn owl, is available. Other species considered to be at risk by perhaps slightly different exposure pathways, the red kite and kestrel, are also now included within a systematic monitoring framework. The Sector Group, through its association with CRRU, makes an annual contribution to the budget of the PBMS. Other interested stakeholders also contribute this budget. The scheme is operated by the Centre for Ecology and Hydrology (CEH) from its facility at Lancaster. A major portion of the funding is provided by the National Environment Research Council (NERC), through the CEH National Capability programme.

Data provided by the PBMS, or by a similar mechanism of sample collection and residue analysis, will permit future monitoring of the extent of SGAR contamination of sentinel wildlife species. It is anticipated that, if the Stewardship Regime is successfully implemented, the extent of wildlife contamination will decline. However, work needs to be done to examine relevant data to determine the level of statistical sensitivity provided by those data. Exposed target and non-target individuals are relatively short-lived. Also, the life duration of the majority of exposed non-target animals is short.

Therefore, if statistical sensitivity is sufficient, it may be feasible to observe a diminution of exposure over a time period as short as three to five years.

Through CRRU, the Sector Group will:

- Continue to make an annual contribution to the PBMS budget and participate in meetings undertaken to direct future PBMS strategies of sampling and analysis.

(ii) KPI 2 - Acute effects

The established UK pesticides post-registration monitoring scheme is the Wildlife Incident Investigation Scheme (WIIS). Once again, this provides a long-term data set which permits examination of the number and nature of incidents involving pesticides which result in harm to non-target animals, particularly wildlife and companion animals. A number of agencies collaborate in the implementation of WIIS. Incidents are investigated on the ground by staff of Natural England. Pesticide analysis of carcases, and the tissue taken from them, is provided by the Food and Environment Research Agency. Data recording and analysis is provided by the Chemicals Regulation Directory. WIIS is funded from the Pesticide Levy applied by government on the pesticide industry.22

An analysis of WIIS incidents involving vertebrate pesticides shows that SGARs are the frequent cause of WIIS incidents. However, when the causes of incidents are investigated, these investigations show that incidents occur only very rarely when SGARs are used according to label recommendations (approved use). The majority of incidents are caused by their purposeful abuse or accidental misuse. This gives confidence that current use practices are not the cause of significant acute non-target impacts. There are a significant number of occasions when detailed and comprehensive investigation is unable to determine the cause (unspecified incidents). However, there is currently no reason to suppose that the frequency of approved use incidents is greater among these unspecified incidents than it is among incidents when cause can be determined.

WIIS provides a valuable long-term data set on acute incidents involving SGARs in the UK. If the Stewardship Regime is successfully implemented it may be possible to see, within WIIS incidents, a reduction in the number of incidents involving the abuse and misuse of SGARs. However, the very low number of approved use incidents recorded is incapable of reduction.

The Sector Group will:

- Continue to provide funding for WIIS through the statutory requirement of the Pesticide Levy.
- Continue to analyse and respond on a regular basis, to data generated by WIIS in future.

(iii) KPI 3 - Knowledge, Attitude and Practice (KAP) Surveys

The main aims of the Stewardship Regime are: i) to improve the knowledge of SGAR users about best practice and about wildlife exposure and appropriate mitigation measures, ii) to change attitudes of users with respect to their use of SGARs and iii) to improve standards of application so as to promote best practice and implement improved mitigation measures to prevent non-target exposure.

Standard practice during such an exercise is to establish baseline information on knowledge, attitude and practice using a survey procedure. Surveys are then conducted at intervals through the implementation period in order to monitor progressive changes.

Through CRRU, the Sector Group will:

- Work with appropriate and suitably expert personnel to develop a KAP survey to investigate SGAR knowledge, attitude and practice among all important user groups. Survey procedures will be developed, with common questions, to permit knowledge, attitude and practice to be compared between user groups. Temporal changes in the measured statistics will also be monitored. The development of the survey procedures will be funded by CRRU and conducted in 2014, and within three months of the Oversight Group endorsing these proposals.
- Co-ordinate stakeholders in the other Sector Groups to undertake the baseline and periodic surveys among their user groups.
- With the relevant stakeholders who have implemented the KAP surveys, co-ordinate the analysis and reporting of survey data to the Oversight Group.

(iv) KPI 4 - Training courses and competence (KAP) Surveys

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Within the implementation of the Stewardship Regime a number of organisations and agencies will develop training courses and operate training provision for a wide range of SGAR users. Many established courses are already in place in agriculture and professional pest management.

Through CRRU, the Stakeholder Sector Group will:

- Co-ordinate recording of training provision by user group in terms of:
  - Course syllabuses
  - The numbers of courses provided
  - The numbers of SGAR users taking courses and passing any subsequent examination.

(v) KPI 5 - Surveys of bird populations

Surveys of incidents involving wildlife and pesticides are essential to monitor acute effects. Surveys of levels of background contamination are similarly essential to determine exposure levels. However, surveys of bird population numbers also contribute to our overall understanding of the potential impacts of a wide range of mortality factors on predatory and scavenging birds in the UK. Such surveys are conducted on an annual and systematic basis by the British Trust for Ornithology (BTO). Data from BTO surveys on all of the species most exposed to SGARs, including barn owl, red kite, buzzard and kestrel, are published by BTO and available in the public domain. These data provide scientifically validated measures of the changes in bird populations in the UK. They present invaluable information for monitoring the impacts of all significant mortality factors on UK birds.

The barn owl is an important sentinel species for UK wildlife SGAR contamination. A study of the UK barn owl population was conducted during the period 2000-2009 this, and the BTO’s recently published Breeding Bird Survey and Bird Atlas, has shown a very significant increase in the number of breeding pairs of UK barn owls in comparison with the previous survey carried out in 1995-1997. The study, the Barn Owl Monitoring Programme (BOMP), was conducted by the BTO in conjunction with the Barn Owl Conservation Network (BOCN) and BTO bird ringers. The Supplier Sector Group will work with BOCN, through the contractor Wildlife Conservation Partnership, to re-establish barn owl population monitoring in selected regions. The purpose of this work will be to study barn owl numbers, breeding success and any observable sub-lethal physiological effects in those areas which are likely to be most affected by any regulatory changes i.e. the areas of most advanced anticoagulant resistance.

(vi) KPI 6 - Pesticide Use

Until 2002 the UK government conducted periodic surveys of the use of all rodenticides, including SGARs, within a range of user groups, including farmers and professional pest controllers. The data provided information on the types of rodenticides used, the volumes applied and also on some aspects of use behaviour. It is highly regrettable that a decision was taken to halt the collection of this survey data. Data such as this would have permitted the prioritisation of implementation of the Stewardship Regime among those who use the largest quantities of SGARs. They would also permit the monitoring of the quantities used.

g. Extension of use arrangements

The fundamental use pattern for the approved use of SGARs in the UK is “in and around buildings”. The majority of all SGAR products applied in the UK are used in this way. However, at times it is essential to apply SGARs away from buildings and in “open areas”. It is generally considered that the risk of exposure of non-target wildlife when SGARs are applied in “open areas” is greater than when they are applied “in and around buildings”.

Examples of such “open area” uses are:

- By gamekeepers to control rats in hedgerows and, in other open areas in the countryside, to protect game-bird eggs, chicks and feed stuff put out as supplemental food for game-birds.
- By those involved in animal husbandry to control rats to protect health and hygiene of livestock kept in open field, such as poultry and pigs, and to protect the food put out for these animals from consumption and contamination in feed troughs and feeders.
- By professional pest control and local authority technicians to protect human health and well-being in public areas where there are rat infestations.

Extension of use arrangements that might permit applications of SGARs in such scenarios would involve adherence to specific agreed codes of best practice. Examples include:

- Adherence to specific use plans agreed between SGAR users and their local authorities.
- Adherence to specific codes of conduct agreed between SGAR users and animal health authorities.
- The provision of specific training for SGAR users in the use of SGARs in “open areas”.

Such measures would need to be monitored and evaluated to ensure that they are effective in controlling rodent infestations and that they do not result in increased exposure of non-target wildlife.
practice. An example is the guideline written by CRRU for gamekeepers in conjunction with relevant stakeholder groups.\textsuperscript{28} Proposals will be put forward by the other SGAR Stewardship Regime Sector Groups for such extension of use arrangements.

The Sector Group will:

- Work with stakeholder groups, as appropriate, to develop best practice guidelines, for “open area” uses of SGARs by all users that will permit their use in all situations in which their application is considered essential and in compliance with the objectives of the Stewardship Regime (see above Guiding Principles in section 3).
- The Sector Group will propose to HSE that all amateur products will carry labels permitting use only ‘in and around buildings’. There will be no amateur ‘open area’ use.

(h) Enforcement (including voluntary initiatives)

Enforcement is an absolute prerequisite of a functioning regulatory process. When successful prosecutions are made it is helpful that any sanctions applied are widely publicised. Various UK agencies have enforcement powers in relation to the application of pesticides, including SGARs. Of significant importance is the work of Natural England in the investigative work done at the sites of WfIS incidents. Other agencies which could help with enforcement, and therefore should be engaged within the Stewardship Regime, include Natural Resources Wales, Department of Environment NI and Scottish Natural Heritage. Also Trading Standards (especially in relation to point of sales issues and storage).

Voluntary enforcement by agencies that represent user groups may also play an important role in the implementation of the Stewardship Regime. For example, both of the principal trade associations in the professional pest management sector implement systematic schemes in which inspections of the operations of their members are carried out. Such schemes should be expanded and made more rigorous.

The Sector group will:

Engage with organisations involved in the enforcement of responsible use of products containing SGARs in order to promote knowledge of best practice and support more rigorous and extensive implementation.

(i) Oversight arrangements

The proposed structure of the Stewardship Regime comprises four Sector Groups and a Steering Group which will be Chaired by CRRU and will contain the Chairs and other representatives from each of the four Stewardship Groups namely:

a. Gamekeeping
b. Professional Pest Control and Local Authorities
c. Agriculture
d. Suppliers (including amateur)

An Oversight Group will be established comprising representatives of the government agencies with policy responsibilities for the Regime, including the Health and Safety Executive, Department for the Environment and Rural Affairs and Department of Health.

The Steering Group will meet the Oversight Group at intervals to be determined by the Oversight Group to report on the progress of implementation of the SGAR Stewardship Regime.

Through CRRU, the Sector Group will:

- As appropriate, attend meetings of the Sector Groups to provide support and information and to co-ordinate their activities.
- Facilitate and Chair regular meetings of the Stewardship Regime Steering Group to track progress and to maintain momentum.
- As required, attend meetings held between the Steering and Oversight Group to report on progress and, if necessary, to redirect stewardship activities according to the requirements of the Oversight Group.

(j) Authorisation conditions

The conditions of authorisation for SGAR products are determined, after consideration of a range of factors and in consultation with various stakeholders, by the Competent Authority for Biocides in the UK, the Health and Safety Executive. Detailed conditions of authorisation are therefore primarily a matter for the applicant for approval for a particular product and HSE. HSE may wish to consider whether more stringent conditions of authorisation should be applied to products placed on the market by suppliers who do not fully engage with the UK SGAR Stewardship Regime.

The Sector Group will:

- As and when requested, engage in discussions with HSE about general matters involving SGAR Authorisation Conditions with a view to implementation of an effective SGAR Stewardship Regime. This discussion will always be in the context of the Guiding Principles of the Regime (see section c.)

(k) Other

The Sector Group will:

- Use all expertise at its disposal and best endeavours to devise additional initiatives that might promote the rapid and effective implementation of the SGAR Stewardship Initiative.

- Apply all possible measures to engage with these proposals all those who hold UK SGAR approvals and authorisations and who have not already made a commitment to assist in the implementation of the UK SGAR Stewardship Regime.

6 Management of Risk

A number of elements of risk have been identified by HSE in discussion with stakeholders. These have been described in detail in the paper from HSE of 9th August.29

These identified risks are as follows:

Some stakeholder groups are difficult to reach, monitor and influence (e.g. end users such as ‘semi’ professional users and amateurs). Their failure to meet stewardship requirements could result in poor practices / irresponsible use leading to exposure of non-target species - this will undermine the whole stewardship regime.

Through the structure of the Regime, all efforts will be made to approach all significant SGAR user groups through communications strategies that will be adapted for the special circumstances of each user type. These strategies will be developed in collaboration between the Sector Groups and in discussion with the Oversight Group.

Stewardship is supported by limited statutory enforcement – communications may not be good enough to achieve safe use by non-statutory means such as stewardship.

This risk is intrinsic in the non-statutory stewardship approach. Clear delivery benchmarks and timelines are required. Regular and rigorous oversight will determine whether the regime is achieving objectives and will permit timely changes of strategy if these prove necessary.

Insufficient / inadequate monitoring due to lack of resources results in a failure to demonstrate the success of a stewardship regime

Detailed proposals for monitoring are to be proposed to the Oversight Group. Current monitoring schemes, such as PBMS and WIIS, will provide important monitoring data for acute impacts and background contamination. A new scheme of KAP benchmarking and periodic KAP surveys will seek to track changes in use practices. The only obvious lack, in respect of monitoring, is the capability to observe changes in the quantities of SGAR products applied by the different user groups. European Competition Law requirements make the collection of such data virtually impossible by any group funded by and comprised of enterprises with direct commercial interests in the relevant markets.

Stewardship not properly supported because it is more expensive and nobody is willing to pay.

The very rapid and highly committed response of a wide range of stakeholders to the call to develop an SGAR Stewardship Regime has demonstrated a keen determination to make stewardship work. Rigorous oversight will be required to ensure that initial enthusiasm does not wane. But the initial responses of stakeholders in all sectors provide optimism that the stewardship approach will work.

Absence of the ‘Big stick’ of regulation and statutory support means nobody ‘owns’ and manages stewardship resulting in stewardship failure.

The committed response of CRRU to accept ‘ownership’ of the Regime is demonstrated by its agreement to co-ordinate the Regime. Once again, detailed monitoring and committed oversight will serve to ensure momentum and deliver objectives. However, the option to revert to the ‘big stick’ approach remains and provides good incentive to all stakeholders to make the stewardship approach work.

13 FEBRUARY 2014

Document prepared on behalf of UK SGAR Stewardship Regime Supplier Sector Group by:
Dr A P Buckle
CRRU Chairman and Visiting Research Fellow Vertebrate Pests Unit University of Reading UK.

APPENDIX 1
Companies represented in the UK SGAR Stewardship Regime Suppliers Sector Group and their representatives.

<table>
<thead>
<tr>
<th>Company</th>
<th>Representative</th>
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<tbody>
<tr>
<td>CRRU (Chair)</td>
<td>Alan Buckle</td>
</tr>
<tr>
<td>Barrettine Environmental Health</td>
<td>Steven Bailey</td>
</tr>
<tr>
<td>BASF plc</td>
<td>Gavin Wood</td>
</tr>
<tr>
<td>Bayer Crop Science Limited</td>
<td>Alan Morris</td>
</tr>
<tr>
<td>Bayer Garden</td>
<td>Alison Mulvaney</td>
</tr>
<tr>
<td>Bell Laboratories Inc.</td>
<td>Brady Hudson</td>
</tr>
<tr>
<td>DuPont UK Limited</td>
<td>Andrew Jenkins</td>
</tr>
<tr>
<td>Killgerm Group Limited</td>
<td>Rupert Broome</td>
</tr>
<tr>
<td>LODI UK Limited</td>
<td>Roger Simpson</td>
</tr>
<tr>
<td>LiphaTech S.A.S.</td>
<td>Lionel Legros</td>
</tr>
<tr>
<td>PelGar International Limited</td>
<td>Gareth Capel-Williams</td>
</tr>
<tr>
<td>P+L Systems Ltd</td>
<td>Tom Holmes</td>
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<tr>
<td>Rentokil Initial plc</td>
<td>Nigel Cheeseright</td>
</tr>
<tr>
<td>STV International Limited</td>
<td>John Rowe</td>
</tr>
<tr>
<td>Syngenta Crop Protection AG</td>
<td>Alex Cornish</td>
</tr>
</tbody>
</table>

APPENDIX 2
Companies who hold approvals and authorisations for rodenticide products in the UK which contain SGAR active substance but which have not engaged in any way with the development of the UK SGAR Stewardship Regime.

1 BABOLNA BIO LIMITED
2 BELGAGRI SA
3 CHIMIGROUP S.r.l.
4 DENKA REGISTRATIONS SARL
5 KWIZDA- FRANCE S.A.S.
6 UNICHEM d.o.o.
7 ZAPI S.P.A.

FIGURE 1
Proposed structure for the implementation of the UK SGAR Stewardship Regime.