



The Campaign for Responsible Rodenticide Use (CRRU) UK

The CRRU UK Rodenticide Stewardship Regime

Question and Answer 2016

CRRU UK Chairman Dr Alan Buckle says,

“We have to get smarter in the way we use rodenticides – and show we are doing so. It is now up to suppliers and users of these essential products to demonstrate that they can be applied without unacceptable effects on UK wildlife and other non-targets. CRRU UK welcomes the opportunity to co-ordinate this important UK-wide stewardship initiative.”

Why do we need Stewardship?

The way we currently use rodenticides, particularly the second-generation anticoagulants (SGARs), leads to widespread contamination of UK wildlife. We know that a high proportion of some bird populations, including barn owls, kestrels, sparrowhawks and red kites, and many mammals, such as stoats, weasels, foxes, hedgehogs and polecats, carry residues of these substances in their bodies.

The UK Competent Authority for biocides, the Health and Safety Executive (HSE), has said that in future it will only authorise rodenticides for use outside buildings if a programme of rodenticide stewardship is put in place. **The CRRU UK Rodenticide Stewardship Regime aims to educate users about the risk to wildlife of exposure to rodenticides and explain how to prevent it.**

Unless the regime is successful, HSE will consider further restrictions on who can use rodenticides and where they can be applied. One such restriction would be to permit use only indoors. That would seriously affect our ability to control rodents, especially rats, quickly and easily.

What is the Stewardship Regime and who runs it?

The regime covers all rodenticides sold to, and used by, professionals outside buildings. It does not involve rodenticides restricted to use indoors, nor the fumigant gases which are the responsibility of the Register of Accredited Metallic Phosphide Standards (<http://www.ramps-uk.org/>). It also does not involve rodenticide products sold to and used by amateurs.

Implementation of the regime is co-ordinated by the CRRU UK Task Force. This is a broad-based group comprising representatives of the 16 CRRU UK Member Companies, invited CRRU Technical Advisors from government and academia, the leaders of the six implementation CRRU UK Work Groups (<http://www.thinkwildlife.org/stewardship-regime/>) and representatives from a wide range of stakeholder agencies, including professional pest control, farming, gamekeeping and conservation.

Cornerstone of the regime is a new CRRU UK Code of Best Practice (<http://www.thinkwildlife.org/crru-downloads/crru-uk-code-of-best-practice/>). Application of rodenticides according to the Code will prevent unnecessary exposure of wildlife, and other non-target animals, and help deliver the objectives of the regime.

What is the role of HSE?

HSE is the UK competent authority with responsibility for the safety and efficacy of biocides, including rodenticides. From 1st April 2016, HSE will issue authorisations for professional rodenticide products for use outside buildings carrying a requirement for compliance by suppliers and users with the conditions of the stewardship regime.

HSE has initiated the Government Oversight Group, comprising representatives from HSE, the Department for Food and Rural Affairs (Defra), Natural England and the devolved administrations of Scotland, Wales and Northern Ireland. This group meets periodically to receive independent reports about stewardship from CRRU UK and make decisions about the continued authorisation of rodenticides.

The requirement for the establishment of the stewardship regime is set out by HSE in a set of 'high level principles' (<http://press.hse.gov.uk/2015/government-agrees-high-level-principles-for-rodenticides-stewardship-regimes/>). These make clear what a stewardship programme must do if it is to meet HSE requirements. They also tell us that any individual or organisation can set up a rodenticide stewardship regime to meet these requirements. Currently, only CRRU UK has done so.

What will the Regime mean to you as a rodenticide user?

If you are applying rodenticides as a part of your job, and using the large packs with the new 'stewardship conditions' labels that are only available to professionals, you will be asked for proof of competence when you buy them. Proof of competence is provided by the possession of a certificate showing that you have taken a CRRU-approved training course and passed the necessary exam. You will be asked to show this certificate when you buy products and you may also be asked for proof of identity, so that sellers can be sure that the person they are supplying is the one who took the course and passed the exam. You can find a list of CRRU-approved training and certifications at the CRRU website (<http://www.thinkwildlife.org/list-of-training-and-certification/>).

Why are farmers exempt?

They are not exempt. For a period until the end of 2017, those who apply professional rodenticides outdoors on farms that are members of a CRRU-approved Farm Assurance Scheme will be considered to be competent. A list of these assurance schemes is shown on the CRRU UK website (<http://www.thinkwildlife.org/list-of-approved-farm-assurance-schemes/>).

These assured farms benefit from a structured and documented rodent control plan carried out by staff that are trained to do the work they are required to do. Each farm is audited to examine the quality of rodent control by an independent assessor. These audits are carried out regularly, usually at least every 18 months. After the end of 2017, the published standards of these assurance schemes will either come into line with the CRRU Code of Best Practice or membership of them will no longer be considered to provide proof of competence.

When will these requirements begin?

The stewardship regime will go live when products become available on or after 1st April 2016 with labels carrying a requirement to comply with stewardship conditions. During a six month transitional period (April to September 2016), products with old (i.e. pre-stewardship) labels will also be on sale until stocks run out, and can continue to be used for some time after that. The detailed time-line for the introduction of the new products and the phase-out of the old ones is shown at the CRRU website (<http://www.thinkwildlife.org/crru-downloads/uk-rodenticide-stewardship-timelines/>).

How will we know if the Regime is working?

The Government Oversight Group will monitor the effectiveness of the regime against the high level principles which the CRRU rodenticide regime should meet. To contribute to this overall monitoring, CRRU has agreed to fund studies to assess the effective operation of the regime:

1. Levels of anticoagulant residues in the livers of UK barn owls will be assessed annually. HSE expects to see a significant decline in the proportion of barn owls carrying rodenticide residues and a reduction in the concentration of residues in the owls' bodies. This work will be done in collaboration with the independent Centre for Ecology and Hydrology (CEH) at the University of Lancaster (<https://wiki.ceh.ac.uk/display/pbms/Home>).
2. A periodic survey will be conducted independently on the knowledge, attitudes and practices of all professional rodenticide users to observe changes over time in these important criteria. A baseline survey has already been conducted in advance of regime implementation.
3. Breeding success of selected UK barn owl populations will be assessed each year. Nest monitoring will be done by the independent Wildlife Conservation Partnership (<http://www.wheathampstead.net/wcp/>), in collaboration with experienced fieldworkers of the Barn Owl Conservation Network (BOCN) (<http://www.bocn.org/>) and the University of Reading.

What if stewardship doesn't work?

We need to see rodenticide residues in wildlife coming down – most importantly in the chosen sentinel species, the barn owl. HSE has an option to introduce more stringent regulation of rodenticides if it is found that the effects of stewardship are inadequate in reducing exposure of non-targets. This may involve even tighter controls on who can use professional rodenticides and where they can be applied.

So it is in the interests of all parties to use rodenticides responsibly, to follow the conditions set out on the new rodenticide labels and to implement the recommendations of the CRRU Code of Best Practice.

Background context available at www.thinkwildlife.org.

Further information: Dr Alan Buckle, CRRU UK Chairman, alan@alanbuckleconsulting.com, tel: +44 (0)1730 826715 or +44 (0)7881 656564.

PR contact: Phil Christopher, Red Rock Publicity, phil@redrock.uk.com, tel: 07802 672304.