



PRCD Policy MEMO – 0001

Policy on rodent control chemicals in Ireland – authorisation, marketing and use

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1. Background

- The legal basis for the making available and use of biocidal products known as rodenticides under product-type 14 is provided by the Biocidal Products Regulation (Regulation EU No. 528/2012).
- In Ireland, the legal basis for control of biocidal products, including rodenticides, is provided by S.I. 427 of 2013 European Union (Biocidal Products) Regulations 2013 (as amended).
- The availability of rodenticide biocidal products to control rats and mice in particular is required for the protection of:
 - public health (vectors, or carriers of vectors, of disease)
 - food and feed stores for human and animal consumption, respectively
 - animal health and hygiene in animal husbandry facilities
 - materials protection, such as telecommunication and ICT infrastructure
- The most widely-used rodenticide products are based on anticoagulant substances of the first generation (e.g. warfarin) or second generation (e.g. bromadiolone). Anticoagulant rodenticides (Anti-Vitamin Ks (AVKs)) interfere with the vitamin K pathways preventing coagulation of the blood and have proven efficacy. This document primarily focusses on the AVK rodenticides.
- Other rodenticide active substances are also available internationally. These active substances include: cholecalciferol; carbon dioxide and alphachloralose (both restricted to mice control only); hydrogen cyanide and phosphine releasing metals (both highly restricted substances for specialised/niche uses/situations by trained fumigation professionals); and powdered corn cob (limited efficacy). These additional substances have restrictions that limit their use. Some of these substances are available in Ireland.
- Each rodenticide product has its own specific hazard and risk profile evaluated during product authorisation.

- Despite the availability of antidotes, the use of anticoagulant rodenticides poses the following potential risks:
 - Primary poisoning of children from hand to mouth contact
 - Primary poisoning of non-target organisms (e.g. wildlife, companion animals)
 - Secondary poisoning via food chains of non-target organisms

- The anticoagulant rodenticides have been classified as toxic for reproduction in the EU under the Classification, Labelling and Packaging Regulation (Regulation (EC) No 1272/2008), when present in rodenticide products in concentrations greater or equal to 0.003%. However their use is permitted, subject to the mitigation of the risks presented through such use, since there currently are no satisfactory alternative products available to control rodent pests.

- Incidents reported by the Poisons Information Centre of Ireland (Beaumont hospital: <http://www.poisons.ie/> and the National Parks and Wildlife Service (www.npws.ie)) confirm that risks from anticoagulant rodenticides result in serious incidents for humans, for companion animals and for wildlife.

- The development of rodent resistance to anticoagulant rodenticides causes serious concern, making these products no longer effective for rodent control. If such products are used, wildlife is unnecessarily exposed to both primary and secondary poisoning.

- Users of anticoagulant rodenticides are categorised into three different groups in the EU:
 - Trained Professional Users
 - Professional Users
 - the General Public

The conditions of use and the risk mitigation measures applied to different products vary for these three categories of users, and some products are restricted for use by certain user categories only.

2. Policy

- The regulation of rodenticide products by DAFM should seek to balance the availability of a diverse range of chemical rodenticide control modalities to:
 - maintain health and material protection goals by promoting the responsible, safe and effective use of rodenticides;
 - address the risk of primary and secondary poisoning to children and non-target organisms by use of appropriate restrictions and/or conditions of authorisation; and
 - prevent the development of resistance to anticoagulant rodenticides in rodents.

- The balance is achievable through:
 - evaluation and authorisation of rodenticide products;
 - regulation of the supply, storage, distribution, display, advertising and use of rodenticides;
 - promotion of the safe and responsible use of rodenticides, based upon an Integrated Pest Management (IPM) approach to their use in accordance with an approved code of best practice; and
 - routine and targeted enforcement measures, including:
 - inspections at premises used for storage, sale and supply of rodenticides,
 - inspections at premises at which rodenticides are used,

- inspections of advertisements of rodenticide products, and
- sampling and analysis of rodenticide products.

3. Policy details

To fulfil our policy aims, The Pesticides Registration and Control Divisions of DAFM will:

- Undertake the renewal assessment of rodenticide active substances at the EU-level and the subsequent renewal assessment of biocidal products in Ireland.
- Authorise rodenticide products, maintaining a register of authorised products.
- Control the marketing and use of rodenticides in compliance with the law.
 - In particular:
 - Restrict permanent baiting (continued or long-term use of toxic bait) to:
 - Trained Professional users,
 - on sites with a high potential for reinvasion when other methods of control have proven insufficient, and
 - products containing bromadiolone or difenacoum only.
 - Require documented justification for each use of permanent baiting, which must reflect the principles of best practice, wildlife awareness, rodent monitoring, assessments of the treatment and the collection of dead rodents and unused bait.
 - Restrict pulsed baiting to:
 - Trained Professional users.
 - products containing brodifacoum, difethialone, or flocoumafen.
 - Encourage the use of a pulsed baiting technique in situations where following application of the principles of IPM, use of the more potent 2nd generation anticoagulant rodenticides is justified.
 - Restrict rodenticide use in certain situations (sewers, open areas, waste dumps) to Trained Professionals only.
 - Designate minimum product pack size(s) for Trained Professional and Professional use products, and maximum pack size(s) for General Public use products.
 - Designate a label stipulation that products be used in compliance with an approved code of best practice.
- Establish and maintain a [Register of Trained Professional Users](#) (PMUs). Trained Professional Users are now invited to register ([link](#)).
- Encourage the development of a culture of IPM in the use of rodenticides, that includes use of alternative non-chemical control methods and preventative methods.
- Promote the safe and responsible use of rodenticides:
 - Engage with stakeholders in the area of rodenticide use (particularly the product authorisation holders, professional pest management services, users of rodent pest management services, industry associations and relevant NGOs) to develop initiatives in this area.
 - Contribute to and support those initiatives, campaigns, courses, research, conferences and training that communicate safe and responsible use of rodenticides, for example, Campaign for Responsible Rodenticide (CRRU Ireland), the Wildlife Aware training programme, Irish Pest Control Association, National Pest

- Technicians Association (Ireland), Birdwatch Ireland, the Pest Management Working Group.
- Initiate the development of training courses for pest control operatives (Trained Professional Users) through the relevant stakeholder organisations, such as the CRRU Ireland Wildlife Aware courses and the Pest Management Working Group course. Training courses should *inter alia* be independent, incorporate Continuing Professional Education (CPE), be accredited by a relevant overseeing body, and complement existing courses and recognised training qualifications.
 - Initiate the development and implementation of a point-of-sale awareness campaign for Trained Professional, Professional and General Public Users of rodenticide products at wholesale, distributor and retail levels. This could include advisory notes to retail/wholesale associations and businesses.
 - Support the development of codes of best practice for the use of rodenticides in varying use situations such as in sewers, open area use (e.g. [CRRU Ireland Best Practice Requirements for Rodent Control and Safe Use of Rodenticides](#), [European Biocidal Products Forum \(CEFIC\) Guideline on Best Practice in the Use of Rodenticide Baits as Biocides in the European Union](#), [CRRU Ireland Effective Control of Rodent Pests on Farms](#)).
- Associate specific conditions and restrictions with anticoagulant rodenticide product authorisations and the product label to enhance user and public safety and to reduce the risks to wildlife (where appropriate):
 - Products must contain an aversive agent
 - Products must contain a dye
 - Only ready-to-use products may be authorised, for all users.
 - Products in the form of contact formulations, other than tracking powder, will only be authorised for use by Trained Professionals indoors in places not accessible to children or non-target animals.
 - Maximum pack size for products for the general public varies for the different active substances, but will not exceed 1.5kg.
 - Minimum pack size for products for Trained Professionals and Professionals is 2.5kg, with derogations for some Trained Professional products that will only be used in low quantities (e.g. gels, caulking guns etc.)
 - Local area environmental risk assessments must be conducted where the product is for outdoor use by Professionals or Trained Professionals.
 - Permanent baiting techniques may only be undertaken by Trained Professional Users, using certain specified products, on sites with a high potential for reinvasion when other methods of control have been proved insufficient and those conditions have been documented.
 - Pulsed baiting techniques may only be undertaken by Trained Professional Users, and only with certain specified products. It is the preferred technique in situations where the use of the more potent second generation anticoagulant rodenticides is warranted.
 - Labels for products authorised for Professional Users and Trained Professional Users will refer to following a code of best practice such as the CRRU Ireland Best Practice Requirements.
 - Support and facilitate the investigation of the presence and extent of rodent resistance to anticoagulant rodenticides in Ireland.

- Embed the principles of safe and responsible use, and adherence to codes of best practice in agriculture / food / feed schemes, quality assurance schemes, procurement schemes & procedures etc.
- Support and promote where appropriate the development of new rodenticide active substances (e.g. cholecalciferol) and support different control modalities for the control of rats and mice (e.g. differing chemical mode-of-actions, non-chemical control, IPM).
- Support and engage in policy initiatives developed by the European Commission in consultation with other Member States and stakeholders.
- Where appropriate, review the use of rodenticide products by the general public in line with policy developments at the EU-level.
- Further develop and implement an enforcement programme designed to encourage compliance with the Regulatory requirements for supply, storage, distribution, display, advertising, and use of rodenticides.

4. Additional Information

4.1. Registers of active substances and products

- **Active substances** that are currently approved for use in rodenticide products in the EU are listed on the ECHA website at: <http://echa.europa.eu/information-on-chemicals/biocidal-active-substances>

(Select Type “14 - Rodenticides”, enter the current date in Expiry Date - From, and click Search)

The screenshot shows a search form with the following fields and values:

EC Number	<input type="text"/>	CAS Number	<input type="text"/>
Substance Name	<input type="text"/>	Evaluating Competent Authority	<input type="text"/>
Type	14 - Rodenticides	Legal Act	<input type="text"/>
Approval Status	<input type="text"/>	Expiry Date	14/02/2017 to -
Date of Approval	- from - to -	Biocide ID	<input type="text"/>
Biocide ID	<input type="text"/>	Biocide Asset Number	<input type="text"/>

At the bottom right, there are two buttons: **Search** and **Reset**. A red arrow points to the **Search** button.

- **Rodenticide products** which are authorised for use in Ireland are listed on the ECHA website at: <https://echa.europa.eu/information-on-chemicals/biocidal-products>

(Select Type “14 - Rodenticides” and Authorising Member State “Ireland”, enter the current date in Authorisation End- From, and click Search)

The screenshot shows a search form with the following fields and values:

Product Name	<input type="text"/>	Active Substance Name	<input type="text"/>
Asset Number	<input type="text"/>	Active Substance EC Number	<input type="text"/>
Type	14 - Rodenticides	Active Substance CAS Number	<input type="text"/>
National Identifier	<input type="text"/>	Active Substance Approval ID	<input type="text"/>
Authorising Member State	Ireland	Authorisation End	14/02/2017 to -
Authorisation Start	- from - to -		

At the bottom right, there are two buttons: **Search** and **Reset**. A red arrow points to the **Search** button.

4.2. Restrictions on User Categories

4.2.1. Trained Professional Users

Trained Professional Users are users who have completed an approved training course, and are registered as Pest Management Trained Professional Users (PMUs) and maintain Continuous Professional Education (CPE). All those who purchase and use 'trained professional' rodenticide products must be registered.

Trained Professional Users **must**:

- i. Be included on the Register of PMUs maintained by the Department of Agriculture, Food and the Marine (DAFM).
- ii. Carry out DAFM-approved CPE to stay on the PMU register.
- iii. Give the required details of their name and address and registration number to product suppliers at point of sale, along with I.D. if required.
- iv. Use only rodenticide products authorised in Ireland with an IE/BPA No.
- v. Use rodenticides according to the stipulations on the approved product label.
- vi. Use rodenticides according to an approved code of best practice, and as part of an IPM approach.
- vii. Carry out a local area environmental risk assessment where rodenticides are used outside.
- viii. Label bait stations in accordance with the product recommendations.
- ix. Document the justification for any use of the permanent baiting technique.
- x. Dispose of dead rodents and unused bait in accordance with the product label.

Trained Professionals Users **must not**:

- i. Use permanent baiting and pulse baiting techniques with products which are not approved for such uses.

Trained Professional Users **may**:

- i. Use rodenticides in and around buildings.
- ii. Use rodenticides in sewers, open areas and waste dumps when trained to do so.
- iii. Use permanent baiting techniques with permitted rodenticide products where justifiable.
- iv. Use the pulsed baiting technique with permitted rodenticide products as the preferred technique in situations where the use of the more potent second generation anticoagulant rodenticides is warranted.
- v. Use covered bait points where justifiable.
- vi. Use loose bait rodenticide products.
- vii. Use contact formulations (i.e. foam or gel)
- viii. Use toxic gas products where such products are registered for use in Ireland, and the user is specifically trained in their use and can demonstrate proof of competence.
- ix. Use rodenticides by direct application in burrows where authorised.

4.2.2. Professional Users

Professional users use rodenticides in the course of their work, and have completed limited training such as that provided by the 'CRRU Rodent Control on Farms Booklet'. They must provide their DAFM number to purchase and use professional use products.

Professional Users **must**:

- i. Use only rodenticide products registered in Ireland for use by Professional Users or the general public.
- ii. Give the required details of their name, address, herd/flock/ HFR/HPR to product suppliers at point of sale.
- iii. Use rodenticides according to the stipulations on the approved product label.
- iv. Use rodenticides in tamper-resistant bait stations only.
- v. Use rodenticides according to an approved code of best practice, and as part of an IPM approach.
- vi. Dispose of dead rodents and unused bait in accordance with legal requirements.

Professionals Users **must not**:

- i. Use rodenticides in burrows, sewers, open areas and waste dumps.
- ii. Use loose grain and paste bait rodenticide products, except where these are supplied in ready-to-use sachets.
- iii. Use toxic gas products.
- iv. Use rodenticides in contact formulations (i.e. foam or gel)
- v. Use permanent or pulse baiting techniques, (Where control of rodents has not been achieved by a control program using AVK rodenticides after 35 days, the user should seek advice from the product supplier or call a pest control service).
- vi. Use rodenticides in covered or protected bait points. (Tamper-resistant bait stations must be used for AVK rodenticides, which are labelled in accordance with the product recommendations.)

Professional Users **may**:

- i. Use rodenticides in and around buildings in accordance with product labels.

4.2.3. General Public Users

All users of rodenticides other than Trained Professional Users or Professional Users are designated as General Public Users.

General Public Users **must**:

- i. Use only rodenticide products authorised in Ireland for use by the general public. (AVK rodenticide products authorised for use by the general public contain lower concentrations of rodenticide active substances than products for Professional and Trained Professional Users. For all AVK rodenticide products there is a maximum content of less than 30 mg/kg of active substance.)
- ii. Use rodenticides according to the stipulations on the approved product label.
- iii. Use rodenticides in tamper-resistant bait stations which are labelled in accordance with the product recommendations.
- iv. Dispose of dead rodents and unused bait in accordance with the product label.

General Public Users **must not**:

- i. Use rodenticides in burrows, sewers, open areas and waste dumps.
- ii. Use loose grain and paste bait rodenticide products, except where these are supplied in ready-to-use sachets.
- iii. Use toxic gas products.
- iv. Use contact formulations (i.e. foam or gel)
- v. Use permanent or pulse baiting techniques. Where control of rodents has not been achieved by a control program using AVK rodenticides after 35 days, the user should seek advice from the product supplier or call a pest control service.
- vi. Use covered or protected bait points (tamper-resistant bait stations must be used).

General Public Users **may**:

- ii. Use rodenticides in and around buildings in accordance with product labels.