Toxic to reproduction

what does it mean for pest professionals?

EU Member States have accepted the recommendation of scientific advisers to reclassify the active substances in anticoagulant rodenticides as 'toxic to reproduction'. Whether you agree with the decision, or not, is immaterial. It's happened! Associate editor Helen Riby reports.

May harm the unborn child, it is difficult to think of five words in the English language with more emotional impact, yet these five words will soon find their way onto many professional rodenticide labels. These disturbing words will be accompanied by the exploding heart warning symbol. Why will this happen? It is because all nine rodenticide active substances approved in the EU (that's brodifacoum, bromadialone, chlorophacione, coumatetrayl, difenacoum, difethialone, flocoumafen, warfarin and warfarin sodium) have been reclassified as toxic to reproduction.

Pest wrote about the thenexpected reclassification of rodenticides as 'toxic to reproduction' in ***Pest*** Issue 43: February & March 2016. In June, the EU Member States met and accepted the recommendation from the European Chemical Agency (ECHA) to reclassify rodenticide actives. There will be a transition period with different deadline dates for making available on the market and using up stocks.

In summary, any rodenticide product with an active substance concentration of 30 ppm or more has been reclassified as 'toxic to reproduction'. No product classed this way can be sold to amateurs and professional use products will have to carry the warning symbol and the 'May harm the unborn child' wording on their labels. Currently, all rodenticide products on the UK market (except for Bayer's Rodilon range which contains difethialone) have concentrations above this limit.

The topic made the agenda at this year's *Pest Control News (PCN)* workshop at PestTech where Killgerm's Dr Matt Davies, wearing his *PCN* technical editor's hat, predicted that many manufacturers will re-formulate their products and offer lower concentration products, without the reprotox label, alongside their existing ranges.

View from across the Channel

It made another appearance in the seminars at the French event, Parasitec, in mid-November. Bertrand Montmoreau of the French trade association, 3D, pointed out that, whilst there may be a transition period for relabelling and so on, since the publication of the 9th ATP (Adaptation to Technical Progress) this summer, the reclassification is now public. He warned that employers and users of these products cannot continue to behave as if nothing has happened saying: "What if an employee or a customer's employee has a baby with a problem? You must be able to justify your use of these products and implement any necessary employee health surveillance."

H360D May damage the unborn child

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There was no mention of any such concerns at the *PCN* workshop but, as we are still part of Europe, it might be something you need to check with your Health and Safety specialist or trade association.

Opinion divided

In general there is a great deal of uncertainty about what the reaction of pest professionals will be. One comment from the *PCN* workshop, that, if someone had eaten the bait, they would have far more to worry about than what impact it might have on the unborn child, was amusing and, indeed, 100% correct. But maybe it missed the point? Yes, the reclassification is about the intrinsic hazard of these materials and nothing to do with the risk of any harm occurring, but will customers be happy having a product labelled this way on their premises, or in their homes?

At PestTech opinion was divided. Some thought it would be business as usual taking the line that, if a service operation is conducting the proper risk assessments, using the correct personal protective equipment (PPE) and following the label, then why wouldn't they still use 50 ppm baits? Others took the opposite view. Yet others felt that it will be pressure from customers that will force the hands of the servicing companies. There are no definitive answers.

We asked the rodenticide manufacturers for their thoughts on reclassification. How will it

Brady Hudson of Bell Laboratories

Nic Blaszkowicz from PelGar International


Richard Moseley from Bayer

impact the industry and what action will pest controllers need to take?

Doubts about efficacy

Syngenta confirmed that the higher concentration products (50 ppm) with the new warning labels will continue to be on the market and available for use by trained professionals. However, they pointed out that reducing the anticoagulant active substance level to below 30 ppm, to avoid the need for relabelling, will mean that the less potent FGARs will no longer be an option. They simply won't work at such low concentrations. The company also felt that some of the lower potency SGARs may also be under pressure to perform at concentrations below 30 ppm but they wanted to reassure pest professionals that they are working hard in the changed regulatory environment to make sure they can fulfil their customers' needs.

Brady Hudson from Bell Laboratories commented: "No doubt many manufacturers are re-assessing their active substances and possibly reformulating to produce rodenticides that will fall outside of the toxic to reproduction classification. Some of the stronger active ingredients will have an effect at reduced concentration, for example, there is already a well established product, difethialone, that is very effective at 25 ppm. The more potent brodifacoum will likely make an appearance at reduced concentration, so there will still be product choice and a way of controlling rodents.

"Unfortunately, with documented widespread resistance, the less potent products such as difenacoum and bromadiolone, may not be effective at reduced concentration levels. I am fairly certain there will be confusion surrounding the classification among pest control professionals, let alone their client base. At this stage, however, it is important not to panic. As and when products hit the distributors' shelves clear advice and training will be available," she advised.

PelGar's Nic Blaszkowicz agreed that there are likely to be some very confused pest controllers out there. He was, however, more reassuring about reduced concentration products, which, he felt, would be effective in the right circumstances. Such products will all have to go through the regulatory system so there will have to be data on efficacy.

He said: "Firstly pest controllers should rest assured that 25 ppm baits will be effective but they will need to understand the difference in toxicity between the actives, which will be magnified at lower concentrations.

"With product stewardship in mind, having access to baits at lower concentrations could be a good thing."

Nic also pointed out that the other major consideration is where the baiting is taking place. Some areas, for example around buildings, or in sewers, or waste dumps, are much less sensitive, so in these areas there's no reason not to stick with 50 ppm product.

"One thing we don't want to happen is for people to shy away from rodenticide use altogether and for problems to develop beyond controllable levels."

As a simple guide he suggested:

- **Non-sensitive areas** – stick with 50 ppm and use the hierarchy of multi-feed difenacoum/bromadiolone first, with single feed products as last resort.
- **Sensitive areas** – 25 ppm all the way with difenacoum for mice, bromadiolone for rats and the single feeds at 25 ppm as the last resort.

Bayer already has an established range of 25 ppm rodenticide products. Marketed under the Rodilon brand these all contain the active substance difethialone and will not be reclassified as toxic to reproduction.

Bayer's technical manager Richard Moseley explained: "Rodilon is already being used successfully for rodent control 'in and around buildings'. The range came onto the UK market six years ago formulated at this reduced level. It comes in four different baiting options and is a single feed treatment."

He continued: "The prediction is that the amateur market will be directly affected as products will not be available to amateur users above the 30 ppm threshold. Amateur products will need to be re-formulated at the lower concentration and consequently there could be a concern about their efficacy and the impact on potential tolerance.

"That could be good for professionals – encouraging more domestic business – but could also exacerbate the situation, where for example, treatment of a domestic infestation by an amateur user is unsuccessful and the pests have developed tolerance and behavioural resistance, meaning they may be harder to treat when the professional is inevitably called in."

"In any case a re-education will be needed, because at lower concentrations, rodents may have to eat more of the bait, so treatments and return visits will need to be more frequent.

Doubts about acceptability

"The concern for professional pest controllers is whether sites they currently treat are going to be happy to have products used with this warning on the label. Employers must pay special attention to vulnerable groups and pregnant women fall into that category. If an employer is adhering closely to Health and Safety Legislation then this additional warning may cause them some concern, especially if they are being audited very closely, as in the case of food manufacturers, for instance," he concluded.