

The Next **EVOLution** of Bait Stations



ONE KEY, ENDLESS SOLUTIONS

What does Tier 1 mean?

In order to receive this distinction from the U.S. Environmental Protection Agency (EPA), a bait station must pass EPA-established protocols that demonstrate tamper-resistance to both children and dogs, as well as possess performance features for weather resistance.



What are the tamper-resistance requirements for children?

Testing protocol requires a testing panel comprised of a minimum of 50 children aged 42 to 51 months being unable to gain access to any station.

What are the tamper-resistance requirements for dogs?

A minimum of 12, young and healthy dogs weighing at least 20kg, are provided unrestricted access to a bait station for at least 2 hours. A station will only pass if all 12 dogs are successfully kept from accessing the bait.

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EVO **EXPRESS**

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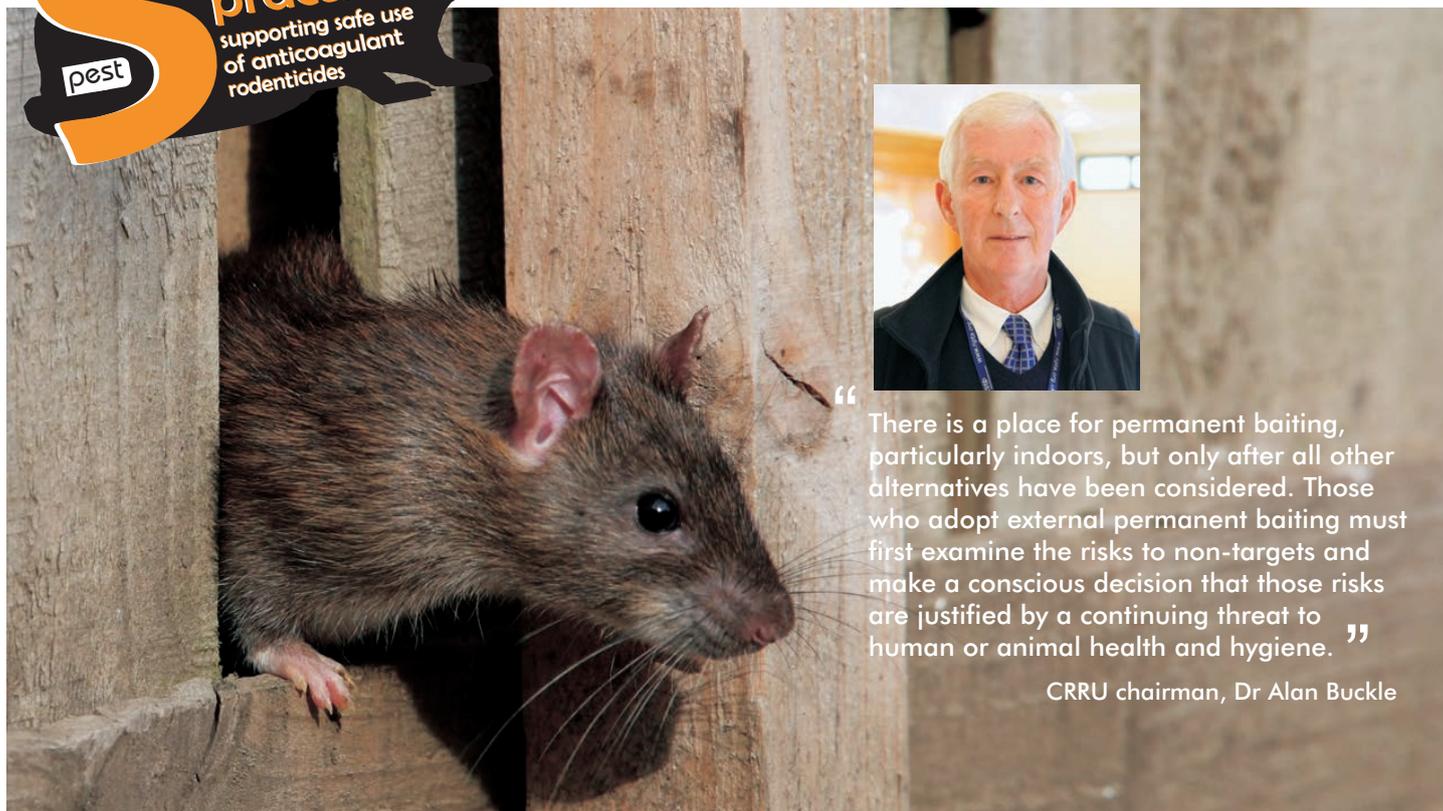
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“ There is a place for permanent baiting, particularly indoors, but only after all other alternatives have been considered. Those who adopt external permanent baiting must first examine the risks to non-targets and make a conscious decision that those risks are justified by a continuing threat to human or animal health and hygiene. ”

CRRU chairman, Dr Alan Buckle

Permanent baiting rules tightened

Changes to the wording on rodenticide labels have effectively made the Campaign for Responsible Rodenticide Use (CRRU) best practice document, *Guidance: Permanent Baiting*, a legal requirement. Associate editor Helen Riby reviews the latest version of this document published by CRRU on 17 September 2018.

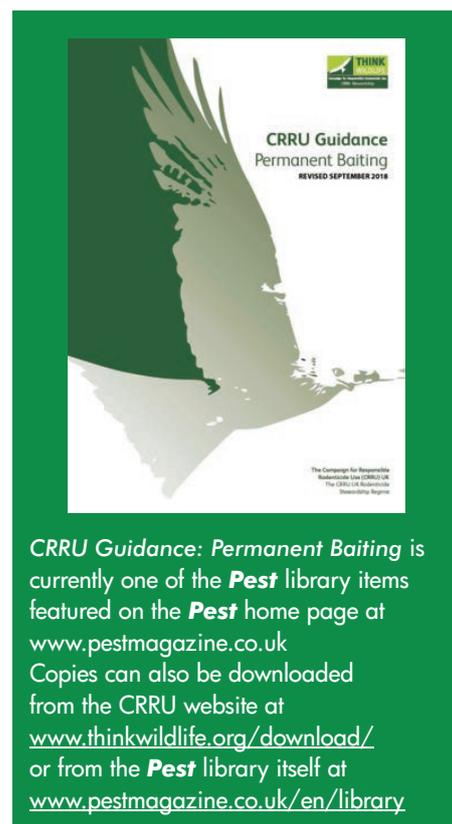
The first edition of CRRU's *Guidance: Permanent Baiting* was published in April 2016 to support the implementation of the UK Rodenticide Stewardship regime. That original 8-page booklet has now been extended to 10-pages to cover the new label requirements. Useful guidance on rodenticide resistance has also been added.

Important lesson

The most important take-home message from the original document was that **permanent baiting outdoors poses a risk to wildlife and should therefore only be used when there is no effective alternative**. The days of winning a contract, putting down rodent boxes complete with toxic bait and then simply checking the boxes periodically should be consigned to history.

The most significant change for the new booklet is its upgraded status. The document is now referred to on rodenticide product labels, so, effectively, there is now a legal duty placed on professional rodenticide users to follow the guidance it contains.

These new label phrases have been adopted by the Health & Safety Executive (HSE), the organisation responsible for UK biocidal product authorisations, but they originate from the European Commission. But don't expect Brexit to change things. It is extremely unlikely that these requirements will be relaxed following Brexit, so it's important to get to grips with them now.



CRRU Guidance: Permanent Baiting is currently one of the **Pest** library items featured on the **Pest** home page at www.pestmagazine.co.uk. Copies can also be downloaded from the CRRU website at www.thinkwildlife.org/download/ or from the **Pest** library itself at www.pestmagazine.co.uk/en/library.

Label changes affecting permanent baiting technique

Let's look at these label changes in more detail. The first point to note is that only products containing bromadiolone and difenacoum will be authorised for use in permanent baiting. However, not all products containing these two active substances will have the authorisation so now, more than ever, pest professionals **MUST** read the product label.

We know that reading product labels may be better than counting sheep when it comes to drifting off to sleep but it really is something that just cannot be avoided.

The official language used is not always the easiest to follow. We hope this article will help to highlight the key points.

So, if you are faced with a situation where permanent baiting is the only answer, what do you need to look out for on your rodenticide label?

New label text for permanent baiting approved products

If the product is approved for permanent baiting then it will state:

- *Permanent baiting is strictly limited to sites with a high potential for reinvasion when other methods of control have proven insufficient.*
- *The permanent baiting strategy shall be periodically reviewed in the context of integrated pest management (IPM) and the assessment of the risk for re-infestation.*
- *Sites under a permanent baiting regime should be inspected regularly in accordance with product label directions. The period between visits should be determined by the technician in charge but will not be longer than every four weeks when permanent baiting is conducted outdoors.*
- *For permanent baiting follow any additional instructions provided by the CRRU Guidance on Permanent Baiting.*

New label text for permanent baiting prohibited products

There are also new label statements for rodenticides which are **NOT** approved for permanent baiting.

As well as the obvious:

- *Do not use the product as permanent baits for the prevention of rodent infestation or monitoring of rodent activities.*

There are two other new phrases:

- *If, after a treatment period of 35 days, baits continue to be consumed and no decline in rodent activity is observed, the likely cause must be determined. Where other elements have been excluded, it is likely that there are resistant rodents, so consider the use of a non-anticoagulant rodenticide, where available, or a more potent anticoagulant rodenticide. Also consider the use of traps as an alternative control measure.*
- *Products shall not be used beyond 35 days without an evaluation of the state of the infestation and the efficacy of the treatment.*

In other words if, in your professional opinion, and having documented your

reasoning, you decide that you need to continue baiting for longer than the 35 days specified on the label, then you can do so.

CRRU identifies four circumstances where longer-term baiting may be required:

- Very large and extensive infestations especially when the scale of the problem has not been recognised when baiting was started;
- Initial reluctance of the rodents to feed on baits (bait shyness and/or refusal to enter bait boxes) which, in effect, delays the start of the treatment;
- Continuing re-infestation of the site by rodents coming in from an outside location. Efforts should be made to deal with 'outside' sources of immigration, including calling on local authorities to use their powers;
- A partially resistant population such that resistance cannot be immediately recognised. Clearly a change of tactic will be required once resistance is found.



IMPORTANT TO NOTE:

1. Despite the reference on product labels to the use of permanent baiting for 'monitoring purposes', CRRU emphasises that it does not recommend the use of any anticoagulant bait solely for the purpose of monitoring for an infestation.
2. The document also reminds pest professionals that it is extremely unusual for any treatment to result in 'no decline in rodent activity' as stated on some labels. However CRRU points out, determining the reason for a treatment failure is essential.
3. A further anomaly is that labels for products containing one of the potent 'single feed' actives (brodifacoum, difethialone and flocoumafen) may also include the statement about switching to 'a more potent anticoagulant rodenticide', but there is, currently, nothing more potent than these three.



Mitie was one of the first companies to stop using permanent baiting

More permanent baiting advice

Clearly all rodenticide professionals (in public health, agriculture and gamekeeping roles) need to read *CRRU Guidance: Permanent Baiting*. To assist our readers, however, we have provided the following summary of the other key points in this excellent document:

1 Definitions

Permanent baiting means bait left out in protected (usually tamper-resistant bait stations) places where there are no current signs of rodents but where there is a threat from them. The purpose is to prevent an infestation.

In normal circumstances anticoagulant rodenticides should clear the infestation in 35 days, or fewer, but there are circumstances where baiting needs to continue beyond 35 days. This is referred to as 'long-term baiting' and, just like permanent baiting, its use must be justified.

Only professionals with demonstrated competence i.e. anyone competent to purchase and apply professional rodenticides under the UK Rodenticide Stewardship Regime may decide to employ the permanent baiting technique.

2 Wildlife problem

Permanent baiting would not be a problem says the guidance: 'if only pest rodents went into bait stations and took the bait.' Unfortunately this is not the case. There is plenty of evidence of small wild rodents – field mice, voles etc. and birds taking the bait.

A reduction in the use of permanent baiting will significantly reduce the level of rodenticide residues found in wildlife.

3 Indoor and outdoor differences

The risk to non-target wildlife from indoor permanent baiting is much lower, so permanent baiting will often be a useful and easily justified technique for the control of persistent house mouse infestations.

Outdoors however, because of the risks to wildlife, permanent baiting should only be used when a pest professional considers the site has 'a high potential for reinvasion' and 'other methods of control have proven insufficient'.

4 Alternatives

There are no direct alternatives, but plenty of actions that can be taken to minimise the need for permanent baiting. These include:

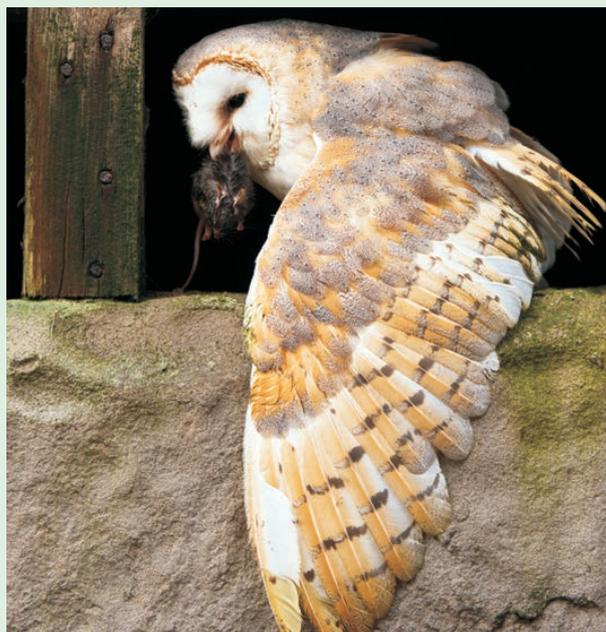
- Effective proofing;
- Frequent and thorough inspections;
- Extending baiting to neighbouring sites (if owners refuse to cooperate, then remember, local authorities have legal powers to require owners to take action against rodent infestations);
- Non-toxic monitoring baits;
- Traps in bait boxes;
- The use of remote monitoring sensors.

5 Using permanent baiting

- If after consideration of all the alternatives you conclude permanent baiting is required, make sure you write down your reasoning and keep it;
- If the technique is being employed outdoors, complete an Environment Risk Assessment;
- Decide how frequently you need to visit the site, bearing in mind that this must be at least every four weeks;
- Select the permanent baiting points carefully. For example, put them near to points of access to buildings that cannot be effectively proofed. Where possible avoid areas of rough grass, shrubs and hedgerows where non-target mammals live;
- If, on inspection, signs of small mammals are found, remove the bait;
- If there is no bait take by rats after a series of checks, remove the bait as, clearly, the risk of an infestation is lower than anticipated.

6 Resistance management

The new version of *CRRU Guidance: Permanent Baiting* highlights the prevalence of anticoagulant resistance and reminds us that the use of resisted anticoagulants against resistant rodents not only spreads resistance but increases its severity. The changes in the product labels which give professional users the ability to use the resistance-breaking compounds brodifacoum, difethialone and flocoumafen long-term is good news for resistance management. It means that, where resistance is present and long-term baiting is necessary to prevent obvious risk to human and animal health, products containing the more potent actives can be used.



As the practice of permanent baiting became more widespread during the 1980s and 1990s, barn owls were increasingly found to be contaminated with rodenticides