

Agriculture (Wales) Bill Submission

As a Trade Association we don't actively use glue boards, however, we do represent a large number of pest control organisations and individual pest control technicians who use them periodically in accordance with the Pest Management Alliance Glue Board Code of Practice (COP).

For reference, it is a mandatory requirement for members of the NPTA to adhere to the COP.

In line with the COP, we believe that glue boards should only be used where there is either (a) an imminent risk to public health, or (b) where all other methods have proved to be ineffective.

There is growing evidence that house mice in particular, are either avoiding rodent bait stations (behavioural resistance). Note, (Behavioural resistance in mice) – Simmons, ICUP 2017 or have an intolerance to cereal-based baits, which make up the vast majority of rodenticides available to professional pest controllers. We refer you to the study carried out by R.E. Humphries (Cereal aversion in behaviourally resistant house mice in Birmingham, UK)

There are a range of alternative methods available, including rodenticides, dogs, shooting etc, but not all are applicable to every situation and are all subject to risk assessment. Rodenticides are themselves under considerable scrutiny at present, due to contamination of the wider environment.

Physical trapping methods can sometimes prove effective; However, these devices also have their own advantages/disadvantages. For example, if a rodent 'trips' a trap but fails to become trapped, they will likely never return to that device, having a knock-on effect on public health. As a consequence, we strongly believe that for any pest control programme to be effective, a range of tools should be available to professionals to ensure that total control can be achieved.

We believe that public health would suffer should a complete ban on glue traps be introduced. Rodents would, in some situations, become extremely difficult to control and treatment programmes prolonged unnecessarily.

Genetic resistance is also becoming more apparent. Surveillance in 2019 by University of Reading's Vertebrate Pests Unit identified that

- House mice (93%) carry a resistant gene
- Rats (61%) carrying at least one rodenticide-resistance gene.
- Among rats, nearly half have inherited the gene from both parents.

For this reason alone, we believe that the removal of an effective physical control method would be inadvisable.

Rodents are well known for being vectors for a wide range of bacteria and viruses (e.g., Salmonella and Hantavirus). Therefore, any additional restrictions placed on methods of control could limit the efficacy of any pest control programme. This could have social implications by potentially causing people to succumb to rodent borne diseases and economic implications for a number of reasons.

(1) the inability through illness of people to work if they contract a rodent borne disease

(2) closure of food (or other) businesses due to health concerns associated with rodent infestations.

We acknowledge that glue boards have the ability to cause suffering. However, there is, in our view, no method of killing that can be considered humane and the elimination of rodents has to be considered critical to protect to public health.

All members of the NPTA are advised that a swift method of dispatch is required and whilst the current COP states a twelve-hour interval between checking boards, this is maximum time allowance. It is therefore highly recommended/encouraged that glue boards are checked more frequently. We have evidence (although anecdotal) that glue boards are frequently used to trap rodents where immediate dispatch occurs. Situations can and will occur where rodents can be found for example, on a food pallet. In these situations, the rodents will disperse when the pallet is disturbed prolonging the treatment programme and having a potential negative effect on public health. Glue boards therefore remain the only effective method to prevent this.

We would not support a total ban on glue boards due to the need to protect public health. However, we would fully support a ban on use by the amateur and non-professional market. These groups have received little or no training on the use of these products and the subsequent dispatch techniques required to ensure that any 'kill' is a swift and humane as possible.