

which cannot be used around domestic, commercial and agricultural premises. Some of the other alternatives only have uses for specific situations e.g carbon dioxide

All of the anti-coagulants currently on the market are likely to be classified as toxic for reproduction category 1A or 1B which would prevent their inclusion in Annex 1 under the cut-off criteria or could be lost under the substitution process. For most categories of biocides specific derogations have been added in to allow biocides to stay on the market on the following grounds:

- a) negligible exposure
- b) the active substance is necessary to control a serious danger to human health
- c) Inclusion would cause disproportionate negative impacts when compared to the risk to human health or the environment arising from the use of the substances and that there are no suitable alternative substances or technologies. However this derogation does not apply to product types 4 and 14-19 (which are in product type 14).

The derogations (a) and (b) are not sufficient to ensure the availability of existing rodenticides. It is not clear at all how a serious danger to human health would be defined or how this process would work in practice. Hence this lack of the derogation (c) is vital.

What action is required?

Lobbying should be concentrated on UK environment committee MEPs at the moment ahead of the June 3rd vote. If this does not work then lobbying of the full Parliament will be required.

A list of environment MEPs can be found at

<http://www.europarl.europa.eu/activities/committees/membersCom.do;jsessionid=408C85DB7989E9F64D3DFB5A197539E2.node1?language=EN&body=ENVI>

The exclusion of the category of rodenticides from derogation 5.1c is not based on sound science and this clause should be removed. This was proposed by 3 amendments (originally numbered 168-170) which should be supported in the vote. Hence the clause “point (c) shall not apply to active substances for product types 4 and 14-19 should be deleted

The facility to grant derogations under article 5.1(b) on the grounds of serious danger to human health should be retained. Some amendments call for this to be deleted.

Unlike the changes to the pesticide registration regulation this is largely a single issue for agriculture. A great many more amendments have been submitted to the environment committee covering all aspects of the Regulation (over 450 in total).

Additional facts about rats

- They are responsible for 50% of farm fires in the UK at a cost of £28 million/year due to gnawing electric cables
- 130 million people could be fed each year on the food destroyed by rats
- Rats carry about 40 diseases with Schistosomiasis alone estimated to infect as many as 200 million people worldwide