

**Subject:**

FW: Wildlife Incident Investigation Scheme - Use of rodenticide at Therfield Road car park - Our reference: 0705BXM21-01

Dear Ms Fossick,

Thank you for your constructive interactions with me in response to my request for information in order to address a concern raised with the Wildlife Incident Investigation Scheme (WIIS) about the use of rodenticide at Therfield Road car park.

I appreciate that there are a number of wider issues arising, with different pieces of legislation that may apply concerning the control of the rats and/or use of rodenticide in the area of an SSSI, along with different authorities who may have responsibility with whom you are interacting. As such in my reply to you below I am only addressing the areas which fall within the remit of the Health and Safety Executive (HSE), with most of the focus being in relation to the concerns raised with WIIS about whether suitable consideration had been given to alternative methods of rodent control before a second generation anti-coagulant rodenticide was applied at this site.

Based on the discussion that I had directly with your pest controller (Mr Burnell), and the documentary information subsequently provided yourself, I am content that consideration was given to the Hierarchy of Control as identified in the CRRU Code of Best Practice prior to application of the rodenticide, and that when the application of the rodenticide was begun it was being applied in a manner intended to minimize the risks to humans, companion animals and wildlife.

In particular it is noted that:-

You are taking action to try to prevent rodent access to food waste deposited in the bins through change in bin design, and are in contact with the local 24-hour drive through restaurant where much of the food waste ending up in the car park is originating so that they are aware of the issues arising. However it would be difficult to either proof the site itself or prevent rodent access to all food and drink as the site is an open car park where food and drink is being discarded irresponsibly (although it is noted that increased litter picking is being carried out to try to reduce food waste present) so the action taken with respect to the bins themselves is considered unlikely to be sufficient. I am however aware that this may also make the adequate control of the rats through use of rodenticide difficult to achieve as they will have access to alternative food sources.

Closure of the car park has been considered but would potentially increase risks to people who may then park on the side of the road and risk being hit by passing traffic.

The site is an open area, with the rats living underground close to the bins with little harbourage that could be removed.

Trapping and/or use of rat catching dogs has been considered but either bring associated risks to humans, companion animals and wildlife or are inappropriate for an area where the public will be present.

Other approaches such as glue traps, alphachloralose or phosphine gas have been considered but are either not appropriate and/or not safe to use at this site.

In my initial consideration of this report into WIIS my understanding was that there was no anticoagulant rodenticide resistance in this area, and hence it may potentially have been possible to use a first generation anti-coagulant rodenticide (FGAR). However, when I discussed this issue with Mr Burnell he indicated that based on his experience with use of such products at a farm in the adjacent area that there were signs of resistance to these FGARs. In the absence of evidence to contradict this, I have accepted at face value his expert experience in the area as stated to me.

Evidence has been presented that an Environmental Risk Assessment (ERA) was conducted prior to the application of the anticoagulant bait, and having identified that there were risks to domestic animals and wildlife I am content that action was taken based on that ERA to site the bait where it would be difficult for (larger) non-target species to access directly to reduce primary exposure, and that regular inspection and removal of dead rodents was planned which would reduce risks of secondary exposure to predators.

The rodenticide used is authorised for use against rats in open areas, so in that respect a legal rodenticide product was being used (in an open area). NB: It is not within my remit to comment with respect to the Wildlife and Countryside Act on the use of an anti-coagulant rodenticide within an SSSI.

Subject to there not being any evidence to contradict the information provided in response to my request I intend to close the HSE investigation into this WIIS concern and take no further action.

Kind regards,