

Mr Paul Davies MS
Chair of the Economy, Trade, and Rural Affairs Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

3 April 2023

Dear Mr Davies MS,

RE: Agriculture (Wales) Bill - factual inaccuracies in Committee Stage 1 Report

I write to you as Chief Executive of the British Pest Control Association to bring to your attention significant factual inaccuracies in the Committee Stage 1 Report of the Agriculture (Wales) Bill.

As Chair of the Economy, Trade and Rural Affairs Committee, with the responsibility over the scrutiny of this Bill, I am writing to you and your committee in the first instance as we believe that the report as it stands, and owing to evidence provided to you by the Minister for Rural Affairs and North Wales, and Trefnydd, is factually inaccurate across a number of points, and if this report is presented as accurate during further debates on the floor of the Senedd, and indeed given Royal Assent, the legislation would be founded on potentially misleading information and the entire process potentially subject to judicial review.

You may recall that I gave oral evidence to your committee where I outlined the industry's commitment to compassionate pest control, and I stated the industry position on glue boards. I state again for clarity that the British Pest Control Association and its members are supportive, as we were in Westminster and as we are across the entire United Kingdom, of a ban on glue boards for public use with an exemption for professional use only through a licensing scheme.

We appreciate that the Agriculture (Wales) Bill is imminently returning to the floor of the Senedd, we have significant concerns with the Committee Stage 1 Report that could undermine sections of the Bill relating to rodent glue boards, owing to the inaccurate information provided to your committee by the Minister, and result in legal challenges from the professional pest control sector and wider.

As the trade body for professional pest controllers, it is our duty to our members to represent their views to policy makers, and to ensure that our members are able to continue to protect public health. We have invested, and will continue to invest, significantly in getting to the bottom of all the numerous factual errors within the report and have outlined the matters within this letter which we hope you will give your full attention.

However, if these matters are not given due attention and corrected before the Bill is further debated and potentially given Royal Assent, we are currently exploring all and every avenue available to us, including seeking advice on a judicial review.

There are two main areas where inaccuracies have been presented. The first is with the oral evidence provided to your Committee from the Minister for Rural Affairs and North Wales, and Trefnydd. The second is with evidence provided by the Minister for Rural Affairs and North Wales, and Trefnydd, in her letters to you and your committee.

In your Stage 1 Report, your committee concludes that *“Having considered the Minister’s letter alongside other evidence received, the Committee does not object to the proposals in the Bill on prohibiting the use of glue traps”*.¹ We object to your conclusion, not because they are your findings, but because your findings are based on factual inaccuracies and severely flawed evidence provided to you.

It is this conclusion based on factual inaccuracies that may potentially mislead the Senedd and it is the inaccuracies leading to this conclusion that we have highlighted in this letter.

1. Points of inaccuracy regarding evidence given to the committee

A. Local Authority use of glue boards

In your report, it states *“In a second evidence session with the Minister on 16 November, Members were told **(1) local authorities did not use them [rodent glue boards]...**”*². This refers to the evidence provided by the Minister. This evidence would make it seem that the vast majority of local authorities in Wales did not use glue boards. As the points below prove, this evidence is severely flawed.

- Only seven of the twenty-two local authorities actually responded to the consultation. Of those who responded, five stated they use them (albeit in limited circumstances, as we would expect).³
- Only two local authorities stated they did not use them because of animal welfare concerns.
- One of the seven respondents directly contradicts the Committee’s findings, stating that there were “significant concerns” regarding the proposed ban of glue boards, citing fears that vulnerable people, hospitals and restaurants would be adversely impacted.

In fact, most local authorities consulted used glue boards, and even if the local authorities who responded were taken as a sample, only 28% of all local authorities would possibly state that they do not use glue boards. Therefore, the very notion that “local authorities did not use them” is factually incorrect and misleading.

¹ Agriculture (Wales) Bill Committee Stage 1 Report (January 2023), paragraph 324

² Agriculture (Wales) Bill Committee Stage 1 Report (January 2023), paragraph 321

³⁴ Explanatory Memorandum Agriculture (Wales) Bill Explanatory Memorandum (September 2022), section 4.42

B. Professional pest controllers in support of the ban

The report states “In a second evidence session with the Minister on 16 November ... and neither they **(2) nor pest control services had raised any concerns about a ban.**”⁴

- Pest control services had raised concerns via their trade associations (see Appendix 1: BPCA Letter to Minister Griffiths MS, dated 13 April 2022). Rentokil is misrepresented in the report as being the entire sector.
- Rentokil is one of over 700 pest management businesses the British Pest Control Association represents (see Appendix 2: BPCA member list of professional pest management companies).
- The British Pest Control Association provided an extensive list of case studies from the sector explaining in detail why pest professionals needed continued access to rodent glue boards (see Appendix 3: Case studies provided to Welsh Government (via ██████████), dated 18 November 2022).

As such, “nor pest control services had raised any concerns about a ban” is wildly inaccurate and factually incorrect.

C. Rentokil Initial plc do not use glue boards

In your report, it states “Members were told that **(3) Rentokil had provided evidence that they did not use them for pest control**, and they were contracted to deal with public health settings.” This was taken as a matter of fact, when in fact, this refers to an undocumented conversation between DEFRA and upon further investigation is denied by Rentokil.

- Rentokil did not provide evidence that they did not use glue boards for rodent control. Rentokil has written to the Welsh government, Defra and BPCA to clarify that they have been misrepresented and gave no such evidence, nor were they consulted by the Welsh Government (see Appendix 4: Rentokil email to BPCA, dated 24 April 2023).
 - The Minister referenced an aide memoir from a DEFRA executive sharing an informal, confidential and unpublished conversation with representatives from Rentokil. Senior Rentokil representatives have said that aide memoir did not accurately reflect their policy and are making representations to ensure that this mistruth is not published further.
 - Rentokil does use glue traps in limited circumstances as a last line of defence to protect against critical risks to public health. Furthermore, it is their belief that glue boards should be banned with the exception of professional use which they will be happy to confirm to you directly.
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As such, “**Rentokil had provided evidence that they did not use them for pest control**” is factually incorrect, the propulsion of a misrepresented private conversation and by no means a basis on which to provide evidence for law.

2. Points of inaccuracy in Minister’s letter to the committee

A. Local authorities do not use glue boards.

In reference to a letter from the Minister, the report states that “The Minister pointed to extremely limited use of glue traps in Wales, and said that **(1) in consultation no local authority had stated they were an essential method of rodent control.**”⁵ As stated above, this statement is untrue.

- Five out of seven local authorities that responded did in fact use glue boards.
- One local authority clarified that glue boards were essential to public health.
- Only seven of the twenty-two local authorities in Wales responded to the consultation.

As such, the statement that “in consultation no local authority had stated they were an essential method of rodent control” is factually incorrect at best and misleading at worst. Over 70% of respondents stated that they used glue boards.

B. A licensing scheme for professional use was too difficult

In the same reference, it further states that “...She also noted **(2) DEFRA’s difficulties with implementing a licensing scheme for professional pest controllers** “most notably with the fact there is no Standard Occupational Classification (SOC) Code for pest controllers and no qualifications or licence is needed to work in that type of role.”⁶ As the trade body for professional pest control, DEFRA has been engaging with the British Pest Control Association since the legislation was passed in Westminster. It is inconceivable that they would not share the progress of such conversations with a Minister from a devolved authority.

- DEFRA has already presented three ways licenses could be granted for glue traps in England at stakeholder meetings.
- [REDACTED] Advisor at DEFRA, communicated to us on 20 December 2022, “Natural England are currently drafting a licensing regime. We expect this to be an iterative process, with a basic outline produced towards the end of January, with a view to filling in the gaps and working towards having a clearer licensing system drafted

⁵ Agriculture (Wales) Bill Committee Stage 1 Report (January 2023), paragraph 323

⁶ Agriculture (Wales) Bill Committee Stage 1 Report (January 2023), paragraph 323

towards summer". This indicates DEFRA and Natural England are progressing in producing an initial draft of a licensing scheme.

Given this progress, it naturally follows that the statement "**DEFRA's difficulties with implementing a licensing scheme for professional pest controllers**" has been potentially exaggerated and is therefore potentially inaccurate.

This entire process seems to have been pushed through the parliamentary process based on a Minister's beliefs. The Minister's personal beliefs seem to have clouded due process in the creation of legislation, and we believe that the Minister may have misled your Committee and therefore potentially the Senedd; leading to what could be an embarrassing and costly mistake for the Welsh Government should a judicial review be pursued.

Despite what the Minister believes, the evidence suggests a real need for professional access to rodent glue boards. Glue boards are a pest professionals' last line of defence between Welsh citizens and the diseases, death and destruction rodents can cause. The banning of glue boards will have potentially catastrophic consequences to healthcare, education, and food supply. In the worst case, this could lead to fatalities.

As the Minister rightfully points out, pest professionals in Wales use glue traps sparingly. But when they are selected, it is because there is no viable alternative, and human lives are at stake.

The professional sector, your local authorities, the British Retail Consortium, UK Hospitality and the Westminster Government are of one opinion. The Minister seems to have led the Welsh Government down an ill-thought-out and dangerous path which puts Welsh citizen's lives at risk. The evidence is clear, it is overwhelmingly in favour of continuing some access to glue boards of public health.

Given that the Economy, Trade, and Rural Affairs Committee's conclusions are based on potentially factually incorrect information, we believe that the Committee should:

1. engage with the Speaker of the Welsh Parliament to immediately stop the progression of this Bill subject to a review of the report;
2. summon the Minister to a meeting of your committee to ask the Minister to provide explanation for the points as set out in this letter: and,
3. reconsider including a licensing scheme for pest professionals to continue using rodent glue boards given the overwhelming evidence in support of their continued use and for the health and well-being of Welsh citizens and their businesses.

Should no action be taken and given the irrefutably inaccurate evidence on which this Bill will progress, we will have no other option but to continue our process of seeking further advice to challenge the Agriculture (Wales) Bill via judicial review if it were to be put forward in its current state.

We have sent this letter to the relevant Minister by copy so that she will be full abreast of our views and our writing to you. We will be writing separately to the Llywydd of the Senedd asking for intervention in the process and also to the Secretary of State for Wales so that he is made aware of this situation.

Thank you for your consideration, and we look forward to hearing how you will address the report's inaccuracies. As always, I and the British Pest Control Association is here to support the Committee in any way we can.

Yours faithfully,

A handwritten signature in black ink, consisting of a stylized 'I' followed by a more complex, cursive 'A'.

Ian Andrew
Chief Executive
British Pest Control Association

Copy

- All Members of the Economy, Trade, and Rural Affairs Committee
- Lesley Griffiths MS, Minister for Rural Affairs and North Wales, and Trefnydd
- Rt Hon Elin Jones MS, Llywydd
- Rt Hon David TC Davies MP, Secretary of State for Wales
- [REDACTED], Nudge Factory (our external Counsel).

Appendices

- Appendix 1: BPCA Letter to Minister Griffiths MS, dated 13 April 2022
- Appendix 2: BPCA member list of professional pest management companies
- Appendix 3: Case studies provided to Welsh Government (via [REDACTED]), dated 18 November 2022
- Appendix 4: Rentokil email to BPCA, dated 24 April 2023.



Appendix 1

TO:

Correspondence.Lesley.Griffiths@gov.wales CC:
bpca@nudgefactory.co.uk

13 April 2022

RE: Glue Traps in Wales

Dear Minister Griffiths MS -

I hope this letter email finds you well.

By way of introduction, I am Ian Andrew, Chief Executive Officer of the British Pest Control Association. The British Pest Control Association [BPCA] is a not-for-profit organisation acting in the interests of our members and on behalf of the pest management industry in the UK.

At BPCA, we have found that the provision of pest management and control services is an area which is often overlooked. However, inadequate pest control can often have catastrophic effects economically, socially and on the public's health. BPCA promotes the highest standards of professionalism within the industry, allowing only organisations that prove their competence to join as members.

As you will be aware, the Glue Traps Offence Bill is progressing through Westminster as we speak. The purpose of the Bill is to licence glue boards, rather than completely ban them.

While BPCA welcomes the banning of glue traps for public use, we believe that the Welsh Government has the opportunity to go one step further than Westminster and provide a more robust solution to the exemption for pest controllers. The Glue Trap (Offences) Bill allows for anyone who carries a licence to obtain a glue board. However, anyone is able to obtain a licence and therefore we feel this clause is not strong enough. At the same time, it is vital that the licensing of glue boards is workable so we can all continue to protect public health effectively.

There is a European-wide definition for a professional pest controller defined by CEPA, the Confederation of European Pest Associations, and adopted by the BPCA, a copy of which is here:

“Professionals are properly trained and equipped pest managers acting in compliance with the best practice of pest management based on a balanced approach to health,

Appendix 1

environmental, economic and biological principles of treatment, in accordance with Integrated Pest Management (IPM)”.

By adopting this definition, Welsh Government can be assured that glue traps are only used by professionals. We would welcome the opportunity to discuss our proposals in full with you.

BPCA members operate across the length and breadth of Wales, and we want to ensure that these professional pest controllers can continue to use glue traps as the only method of quick capture (and dispatch) available to protect the health and wellbeing of the people of Wales.

To that end, I ask that you take the content of this letter into consideration. I would be pleased to meet with you, your ministers, or your officials to talk this through further and support wherever appropriate.

Thank you in advance for your attention on this important issue. Kind regards,



Ian Andrew

Chief Executive

British Pest Control Association

Appendix 2: BPCA member list (UK-only)

BPCA represents over 700 professional pest management companies across the UK. Rentokil is one voice in a rich mix of highly professional companies employing over 3,000 trained technicians. BPCA represented the views of all these companies as their chosen trade association.

7039 1 Env Solutions Ltd
5110 1st A Pest Control Service Ltd
1024 2022 Environmental Science FR SAS T/A Envu
1395 3 Counties Pest Control
9660 3C Pest Solutions
5496 4 Season's Environmental Services Ltd
5829 5 Star Pest Control
1002 A & H Pest Control Services
5492 A & M Hawk UK Ltd
6624 A Breeze Pest Control Ltd
9664 A J Walker
2642 AA Pestroy
2846 Abal Environmental Services
7147 Abate Ltd
1208 Abate Ltd T/A Monitor Pest Control
1789 Abbey Services (Scotland) Ltd T/A Abbey Pest Control
4427 Abee Pest Control
7898 Abel Solutions Northern Ltd
5282 Absolute Pest Control Ltd
9060 Access an Area Ltd
1813 Action Pest Control Ltd
1016 Action Pest Control Service
7758 Actionforce Pest Prevention
1820 Active Environmental Services (UK) Ltd
6425 Acute Pest Control
6475 Adam Lott Pest Control Ltd
7477 Adept Pest Consultancy Ltd

6082 Aderyn Ltd
1021 Advance Fumigation & Pest Control Ltd
9061 Advance Pest Control Bristol Ltd
2575 Advanced Environmental Services
4555 Advanced Pest Control Ltd
1022 Advanced Pest Management Ltd
5050 Advantage Environmental Services Ltd
9269 Aerial Services Scotland T/A Home Services Group
4830 AG Pest Management Ltd
7242 AGS Pest Control
2836 Airedale Pest Control Ltd
1788 Albany Environmental Services Ltd
1788 Albany Environmental Services Ltd
5210 Aliard Environmental Services Ltd
9372 All Clear Environmental Services Ltd T/A Pest Clear Environmental
8119 All Clear Pest Control (Southern) Ltd
7337 All Creatures Great and Small Pest Control
6207 All Pest Services (Scotland) Ltd
9586 Allen Pest Control
5762 Allpests Pest Control Ltd
6396 Alpha Fumigation Services Ltd
4692 Alphakill Environmental Services
7090 Alternative Pest Control Ltd
4494 Ambush Pest Control Ltd
9325 Amicus Environmental Services Ltd
8236 AML Pest Control
4691 Andy Law Pest Control
4466 Anevo Environmental Solutions Ltd
5594 Anglian Pest Control
7717 Anglo Pest Control
5529 Anti-Pest Environmental Services

4308 Any Pest
6730 Aocs Property Maintenance Ltd
1038 APC Pest Control Ltd
5653 Apeer Bird and Pest Control Ltd
8726 Apex Environmental Services (UK) Ltd
9214 Apex Services
1041 Apollo Pest Control Hygiene Services Limited
10331 AR Pest Control
7934 Arc Pro-tect (Pest Solutions)
7492 Arcus FM
9652 Area Pest Control UK Ltd
7768 Arimos Pest Control
8210 ARK Pest Control Ltd
6080 Armour Environmental Services Ltd
6378 Artemis FMC Ltd
5109 Arvag Ltd
8127 AS Pest Control Solutions
8725 Asland Pest Control Services
8490 Asset Pest Control Services LLP
1045 Associated Pest Control Ltd
5920 Atalian Servest Pest Control Ltd
10048 Ataul Khan
2758 Attack Environmental Ltd
10103 Aurora Pest Control
2121 Avalon Abseiling Ltd
8140 Aventguard Pest Control Services
4485 Avid Pest Control Ltd
4243 Axatax Pest Control
9988 B & M McHugh Ltd
5856 B&D Pest Control
9816 Baileys Pest Control Ltd

2623 Balcombe Pest Control Ltd
1047 Bar Pest Control
8742 Barnaby Thorpe
10149 Barnard Pest Control
1051 Barrettine Environmental Health
10168 Barricade Pest Control Ltd
1346 BASF Plc
1053 Beaver House Services Ltd T/A Beaver Pest Control
7198 Bed Bug Hunters & Prime Pest Control
1054 Belfast City Council
1055 Bell Laboratories UK Ltd
10146 Bens Bugs Pest Control Ltd
1058 Betapest
7282 Bexley Pest Control Ltd
9486 BFG Pest Management
8276 Biggs Pest, Damp & Timber Solutions
5620 Bioguard Environmental Ltd
8135 BioNET Pest Control Services Ltd
9616 Bird & Pestworx
5821 Bird and Pest Solutions Ltd
6019 Birmingham Pest Control
8402 Black Dog Pest Solutions UK
10264 Blackdawg Vermin Control Ltd
7479 Border Control Services Ltd
9557 Borough Environmental Services Ltd
2627 Bounty Pest Control & Environmental Services
1063 BPC (Anglia) Ltd inc Breckland P/C & Flyscreens Plus
5990 BPM Bird & Pest Management
6673 Bristol Pest Control Ltd
9417 British Airways Holidays Ltd
4531 BTP Environmental Services Ltd

9585 Bugwise Environmental Services Ltd T/A Bugwise Pest Control
7690 Buildings 2 Clean
5731 Bullseye Pest Control
1070 Burns Environmental
5618 Bypest Environmental Services Ltd
6821 C Hanlon Facilities Management Ltd
4898 C&D Pest Control
7440 Caldwell Wright & Co - Complete Pest Elimination
7060 Caledonian Maintenance Services Ltd
7878 Canine Assisted Pest Eradication (CAPE SPC)
5993 Capital Pest Control Services
1778 CCS Jeweltone Ltd
6119 CDP Environmental Ltd
1287 Charnwood Foods
1078 Check Services Ltd
8057 Chelmsford Pest Control
2725 Cheltenham Borough Council
7538 Chores Hygiene Management Ltd
5974 Cimex Pest Control Ltd
9875 Cinque Ports Pest Control Ltd
8430 Citizen Housing
9541 City Hawks Pest Management Ltd
10388 City Pest
9572 City Pest Control & Cleaning
5627 Cityspec Specialist Pest Management Solutions Ltd
1080 Cleankill (Environmental Services) Ltd
5199 Clearway Environmental Services UK Ltd
1081 Clearwell Pest Control Services Ltd
8858 Cliverton
8528 Cobra North East
6498 Collins Pest Control

1084 Command Pest Control Ltd
8045 Competitive Pest Services
7149 Complete Pest Control
7173 Complete Pest Control Services Ltd
5343 Concept Pest Control
4426 Control Pest UK Ltd
5891 Control Services Ltd
7381 Control Solutions Pest Control Ltd
1086 Coopers Pest Control
5438 Countrywide Environmental Ltd T/A Countrywide Environmental Services
1871 Countywide Pest Control & Fumigation
10379 Covkill Pest Control
6747 CPH Environmental Ltd
8116 Cranfield University
6871 Crisp Websites Ltd T/A PestFix
1090 Crown Pest Control & Environmental Services
9317 Crystal Group Leeds Ltd
1091 Crystalkil Ltd
6222 CSS Pest Services
1092 CTF (Pest Control) Ltd
6267 Cumberland Council
5379 D&R Solutions Ltd
8251 DALPEST Pest Solutions
5615 DB Compliance
4391 De Sangosse Ltd
1351 Dealey Environmental Ltd
1902 Destrodent Pest Control Ltd
10028 Devon Pest Solutions
10262 DH Environmental
6949 Direct Group Yorkshire Ltd (DGYL)
5196 Discreet Pest Control Ltd

4725 Discreet Pest Management Ltd
7046 Dispatch Pest Control
7155 Diverse Commercial Solutions
10450 DJB Pest Control Ltd
8382 DoctorPest
1103 DRE Pest Control Ltd
9406 Duchy Pest Control
6277 Dudley Metropolitan Borough Council
10409 Durant Pest Solutions
6334 Durham County Council
8327 DW Pest Control
5561 Dyno-Pest
4843 East Coast Pest Control Ltd
8765 East Dunbartonshire Council
4176 Eastern Counties Pest Control
4599 EBS Pest Control Ltd
1365 Ecolab Ltd
6693 EcoShield Environmental Services
9893 Ecotech Pest Control
5445 Ed Allan Consultancy Services
1109 Edinburgh City Council
9497 Edinburgh Environmental Services Ltd
10402 Effective Pest Solutions
7776 EKO Services
7074 Eliminate Ltd
6386 Eliminate Pest Control Ltd
6050 Elite Pest Management Ltd
7124 Empire Pest Control Ltd
9596 Emris Services Ltd
4399 Emwood Pest Control Limited
1009 Entomol Ltd

4520 Envirochoice Ltd
5717 Enviroguard (Northwest) Ltd
5834 Environ Property Services Ltd
5844 EnviroNI Pest Control Solutions Ltd
6887 Environmental Pest Control
9698 Envirosafe Pest Control Ltd
4244 ENVIROTEC
8401 Eradicate Pests Limited
10449 Eradikill Pest Control
1120 Eradipest
1121 Essex Fumigation Ltd
4996 Europest Environmental Services Ltd
2703 Excel Environmental Services
6903 Excel Pest Management
5206 Extreme Environmental Services Ltd
1127 Falcon Pest Services Ltd
5754 Falconry Services
9140 Fast Track Pest Control Ltd
5999 FCC Recycling (UK) Ltd
1111 Felix Pest Management
10039 Fen Pest Control
7447 Fermanagh Pest Control Ltd
10490 Final Pestination
8398 First Call Pest Management
7809 First Enviro Ltd
10432 Flytech Pest Control Solutions
1196 Front Row Environmental Services
5663 Gateshead Council
7476 GB Pest Management Ltd
1140 Glade Pest Control Services Ltd
1142 Glover and Associates Ltd

6969 Godfrey Pest Control
9280 Gold Pest Control Ltd
8997 Gold Standard Pest Solutions Ltd
4535 Goodwin Pest Management
6144 GP Environmental
9697 Green Rock Services
5283 Green Shield Ltd
5491 Greener Ways Services Ltd
7325 Greenlab Pest Control Ltd
9283 Greenthink Ltd
1147 Greenway Pest Control Services
7662 Greystones Pest Control
7195 Ground Control Ltd
2009 Guardian Pest Management Ltd
7787 H&J Martin Ltd
8778 Hademly Ltd
8908 Hamptons Groundcare Ltd
9265 Hanscan Ltd T/A Mesh Direct
8491 Harris Associates (South West) Limited
4170 Harvey Environmental Services Ltd
5479 HawkEye Pest Control Ltd
4507 Hawkman Services Ltd
7824 Hawthorn Pest Control
4251 Healthguard Ltd
1807 Heath Pest Control Services
9201 Height for Hire Ltd
2030 Hillbans Pest Control
6204 Hinton Pest Control Ltd
1156 HLA Pest Control Services Ltd
8126 Hockley International Limited
7092 Hovis Ltd

7771 Hozelock EXEL
1983 HSQC SAFERPEST
8596 Hunter Pest Services
1366 Hygiene Group Ltd
4730 HygieneZone Ltd
6291 Hyndburn Borough Council
2093 Ill Shires
5626 IMPACT Environmental Pest Prevention Ltd
9083 Impact Support Solutions Ltd
9531 Imperium Pest Control
4200 Independent Pest Control & Hygiene Services Ltd
7781 Independent Pest Management & Insect Consultancy Ltd
7075 Indigo Pest Control
1167 Instakil
5807 Instant Pest Solutions Ltd
10431 Insuraclean
9961 Insx Pest Control
4092 Integrated Pest Management Ltd
8588 Integrum Services Ltd
5506 Intelligent Pest Control Ltd
10211 Intercept Plumbing & Drainage Ltd
5513 Intercleanse (Pest Control) Ltd
10285 Invicta Environmental Ltd
8621 iX5 Environmental Services Ltd
8319 J & J Pest Prevention
4585 J Alvey Pest Control
9949 Jack Black Pest Control Services
6585 James Dighton Pest Solutions (JDPS)
9600 Jarsen Ltd
6422 JCB Environmental Services
10162 Jez Blackburn Bird Trapping Ltd

9111 JFD Field Biologist
10143 JFL Services
10400 JM Pest Solutions
9598 John Howe
6054 John O'Conner Pest Control GM Ltd
9717 JSB Pest Control
9771 Jtm Technical Ltd
6827 Kapow Pest Control
10025 Kent Pest Management Ltd
9264 Kerry Pest Control Ltd
4912 Key West Pest Control Midlands Ltd
4908 Kilgannon Associates
9562 Kill Line Pest Control
1179 Killall Pest Control Ltd
4509 Kill-A-Pest Ltd
1181 Killgerm Chemicals Ltd
5879 Kiwa Agri Food Ltd
7642 Knowsley Metropolitan Borough Council
8001 Koicom Services
10010 KTT Services
1185 Kwickill Pest Control Ltd
8321 Lady Bug Pest Control
8452 Lancashire Bird Control Limited
8129 Lancashire Pest Control Ltd
8678 Landguard Ltd
10157 Landscape and Drainage Solutions Ltd
6971 LBS Pest & Wildlife Solutions
1188 Leo Pest Control Environment Services Ltd
7148 Lincspes Ltd
8026 Little & Large Pest Control Ltd
7396 LK Pestaway

5111 Lodi UK Ltd
7401 London Borough of Barking & Dagenham
10050 London Borough of Barnet
4523 London Borough of Brent
4025 London Borough of Camden
5750 London Borough of Hackney
2119 London Borough of Lambeth
5448 London Borough of Merton - Regulatory Services Partnership
2042 London Borough of Southwark
4664 London Network for Pest Solutions Ltd
9969 LRC Environmental Ltd
9329 Macro Pest Control
6813 Maintenance Associated Services Ltd
6968 Malmik Pest Control Ltd
1940 Manchester City Council
10239 Mandstrad Ltd T/A MSE Pest Control
9488 Mariner Industries Ltd
1198 Masons Pest Control Ltd
4946 Maxload Ltd T/A BPC Pest Control
10294 MD Pest Control
5440 Medway Norse Ltd
1202 Melford Environmental Services Ltd
2699 Menco Resolve Ltd
9955 Mercury Pest Control
4310 Merlin Environmental Solutions Ltd
7760 Metal Stone (Cleaning and Property Maintenance Services) Ltd T/A Bees Knees
8668 Metex Ltd
7815 MG Drainage Ltd
4551 Mice and Clean Ltd
10164 Michael Moore
1205 Microbee Ltd

7287 Mid Wales & Borders Pest Control
4042 Midland Pest Control Ltd
4347 Millennium Pest Control Ltd
10376 Miss Catch'EM Pest Control
4678 Mitar Environmental Services
8868 Mitchells & Butlers
6812 MJ Pest Control Ltd
4392 MJW Pest Control
6107 MKB Environmental Services Ltd
6038 MMK Investments Ltd T/A MG Pest Control
9569 Monsterkil
9000 MP Environmental
1209 MR Pest Control Environmental Services
10083 Mr Steven Edwards
5992 Multipest
10148 Musca Pest Management Services
9316 Nanogreen Cleaning Ltd T/A Krypton Environmental
10236 Nationwide Hire Ltd T/A Wownow Hire
2624 NBC Environment
2648 Nestle
9991 Neuronx Limited
10186 Newcastle City Council
10293 NI Pest Control & Proofing
7366 Nix Ltd T/A Lancashire Environmental Services
6445 Noah's Ark Environmental Services Ltd
1222 North West Pest Control
2558 Northants Pest Control Company
1822 Northern Pest Control Ltd
5678 Northumbria Pest Control Ltd
10444 Norwich Pest Control Ltd
9939 Nudge Factory

7390 Old Bill's Pest Control
5831 Option Hygiene Ltd
5332 Orbis Protect Ltd
7397 Origin Housing Ltd
5157 Oxford Direct Services Ltd
7524 P&J Stratton Investments Ltd T/A The Pest Controller
1717 P&P Pest Control Ltd
10230 Pale Horse Pest Control Ltd
5143 Peabody Trust
5530 Peak Pest Control
9550 Pegasus Pest Control
10456 Peledex Ltd
2228 PelGar International Ltd
5805 Pelsis
7521 Permkill Ltd
10418 Pest Control Global Solution Ltd
5752 Pest Control Solution & Bedbugs Treatment
4833 Pest Defence Ltd
7678 Pest Doctor North West
9815 Pest Dominion Limited
5463 Pest Express Ltd
10289 Pest Global Ltd
6809 PEST ID Ltd
7657 Pest in Peace Ltd
10240 Pest Piper Ltd
1069 Pest Prevention and Cleaning
7400 Pest Professionals
8221 Pest Rescue London
9888 Pest Response Ltd
9581 Pest Right Environmental Services Ltd
9690 Pest Right Ltd

10277 Pest Shot
1248 Pest Solutions
4686 Pest Solutions
10009 Pest Solutions Peterborough Ltd
4435 Pest Tech Environmental Services
9956 PestAcuity
5825 Pestakil South West Ltd
10356 Pestandco Ltd
7737 Pestbusters East Kent
4484 Pestcall
7125 PestControl.co.uk (Franchising) Ltd
9848 PestControl.co.uk (LE) Ltd
9850 PestControl.co.uk (RH) Ltd
9851 PestControl.co.uk (TN) Ltd
9849 PestControl.co.uk (TW) Ltd
9540 Pestcure Ltd
6002 Pestek Pest Control
9455 Pestevo
1255 Pestex Ltd
1724 Pestex Services
8132 Pestforce - Armagh & County Down
9153 Pestforce - Bournemouth / Dorset
9160 Pestforce - Brighton
9165 Pestforce - Cardiff
6505 Pestforce - Coventry
9161 Pestforce - Crawley
6507 Pestforce - Derbyshire
9593 Pestforce - Dundee
8166 Pestforce - East London
6513 Pestforce - Edinburgh
9154 Pestforce - Enfield / Watford

6590 Pestforce - Essex
7187 Pestforce - Gloucester
6516 Pestforce - Gloucestershire
9151 Pestforce - Hertfordshire
7182 Pestforce - Hull
10270 Pestforce - Maidstone
9156 Pestforce - Newcastle
9259 Pestforce - Northampton
6482 Pestforce - Northern Ireland
9158 Pestforce - Nottingham & Mansfield
6534 Pestforce - Oxford
6385 Pestforce - Peterborough
6549 Pestforce - Portsmouth
9162 Pestforce - Shropshire
7756 Pestforce - South Nottingham
8121 Pestforce - Southampton
6539 Pestforce - St Albans
6540 Pestforce - Staffordshire
6005 Pestforce - Stockport
9195 Pestforce - Teeside
5977 Pestforce - Wakefield/South Sheffield/Rotherham
8957 Pestforce - Warwickshire
6544 Pestforce - West London
5321 Pestforce UK Ltd
5557 Pestguard
2815 Pestguard Services (Scotland) Ltd
5624 Pestige Ltd
1110 Pestoclear
1260 Pestokill
6167 Pestokill Environmental CI Ltd
8958 Pestology Ltd

2649 Pestology Pest Management
5659 Pestpro Bird Solutions Ltd
6937 PestPro UK Ltd
1261 Pestproof Ltd
8671 Pests Birds and Bugs Limited
9778 Pests R Us Ltd
7628 Pest-Tech Ltd
5084 PestTrain
1056 PESTUK
6710 PESTUK (Basingstoke)
6115 PESTUK (Farnham)
7725 PESTUK (Harrow)
9211 PESTUK (High Wycombe)
5902 PESTUK (Maidenhead & Marlow)
7069 PESTUK (Newbury)
8339 PESTUK (Oxford)
8903 PESTUK (Salisbury)
7604 PESTUK (Walthamstow)
9209 PESTUK (Ware)
7068 PESTUK (Wokingham)
10139 Pestverminator
5919 Pestwright
9834 PG Bosworth Limited
6846 PGH Pest Control & Prevention
8648 PGM & Son Pest Control Ltd
4174 PiedPiper Northern Ltd
9720 Pinpoint Environmental Services
8899 PLA Pest Control
9588 Platinum Pest Control
4360 PPC Environmental Ltd
10332 PPM Environmental Ltd T/A Pure Pest Solutions

5520 PPM Services
1267 Precision Abseiling Ltd
9705 Precision Pest Consulting Ltd T/A Precision Consulting
1269 Precision Pest Management Solutions Ltd
7002 Predator Pest Solutions Ltd
5062 Premier Environmental Ltd
5850 Premier Pest Control
4295 Premier Pest Control Company Ltd
4834 Pro-Active Pest Management Services Ltd
7540 Proactive Pest Solutions Ltd
7099 Problem Solved Pest Control
9930 Procure Enviromental Services Ltd
10047 Pro-Check Environmental Services Ltd
7681 Professional Pest Control Services
4529 Prokill
5596 Prokill (Avon)
5734 Prokill (Birmingham South East)
5631 Prokill (East Essex & South Suffolk)
6406 Prokill (Heart of England)
5521 Prokill (Hertford)
5472 Prokill (Manchester)
5554 Prokill (Shropshire)
6408 Prokill (Surrey East & Sussex West)
5597 Prokill (Thames West)
5523 Prokill (Wirral)
5533 Pro-Kill Environmental Ltd
7742 Pro-Pest Services
4246 Proserve
7079 Protech Pest Solutions (London) Ltd
1281 Protectahome Ltd
10442 Protek Environmental

4486 Protex Pest Control Services Ltd
8985 Purean Solutions and Technology
6460 Quick Pest Control Ltd
1284 Quickil Pest Control Services Ltd
9900 R&A Services (South East) Ltd
9774 Raigins Pest Management
5540 Railscape Ltd
1286 Randall Crawford Pest Control
2765 Rat Pak Engineering Ltd
7466 Ratdetection.com
9003 RatGate Ltd
5978 Rational Pest Control
8497 RDS Partnership Ltd
5044 Regional Environmental Services
2314 Regional Pest Services
7764 Reliance Pest Management
9827 Reliance Service Solutions Ltd
10261 Resolvapest Ltd
5548 Rezarf Ltd
9387 Rhino Pest Management
9788 Ridit Pest Control
6906 Ridtek Pest Control
1332 RM Services Ltd
1333 Rodent Services (EA) Ltd
1335 Rokill Limited
1337 Russell IPM
9673 RW Pest Control
9556 S R Heasman
10441 S&S Pest Control Ltd
6510 S.W.A.T Pest Control Ltd
7025 Sabre Kent Ltd

9681 Safe & Sound Hygiene & Pest Control Ltd
7582 SafeGroup Services Ltd
1339 Safeguard Pest Control & Environmental Services Ltd
6708 Safesite Environmental Ltd
9936 Salomi Gorde
4510 Schendel's Independent Environmental Solutions
1342 SDK Environmental Ltd T/A Dial A Pest
4395 Search UK Pest Control Ltd
6683 Secure Pest Management
9351 Sene Pest Control Kent
8233 Senior Internet
8233 Senior Internet
7659 Sentomol Ltd
4156 Servicecare
7235 Servicetracker
9374 SGC Environmental
4609 Sheffield City Council
6383 Shield Environmental Solutions (Selby) Ltd T/A Shield Pest Management
1345 Shield Pest Control UK Ltd
7453 Shropshire Council
9597 Sillwood Construction
9409 Silverlining Pest Control
7297 Simpson Turner Ltd
6015 Smith Pest Control (trading name of Gandy Services Ltd)
6601 Smyth Pest Control
7534 Solutions TAD Ltd
10175 Sorted Pest Control
7431 Spearhead Pest Control
9106 Spectrum Pest Control
8074 Spotlight Pest Control Services Ltd
9495 Spotta Ltd

5676 St George's Pest Control Ltd
10100 Starling Commissioning Limited
4777 Stockport M B C
2856 Strathearn Pest Control
10434 Stuart Taylor
2665 Suddenstrike Ltd
4723 Sumitomo Chemical (UK) Plc
9405 Summers Environmental Services T/A Northern Pest Management
9591 Summit Pest Control Ltd
7618 Sun Pest Control
7580 Surefire Pest Control Ltd
6377 Swarmcatcher Ltd
4850 Swift Pest Control Ltd
9031 Swiftkill Ltd
6641 Syngenta UK Ltd
7212 Tactical Environmental Services Ltd
7985 Tae A Moose Pest Control Services Ltd
2419 Target Pest Control & Hygiene Ltd
7660 Target Pest Solutions Ltd
9592 Technikil Pest Management Ltd
1229 Tennals Pest Control Ltd
1734 Terminate Environmental
1364 Terminex Ltd
7520 Terrier Pest Control Ltd
5087 Thames Valley Pest Control
7689 The BB Group Ltd T/A Protech Direct Pest Control
9648 The Pest Company Berkshire
9703 The Pest Company Essex
4956 The Pest Company Ltd
9568 The Pest Company North East & Yorkshire
9977 The Pest Company West Yorkshire

9500 The Pest Detective
1810 The Pest Management Consultancy
5161 The Pied Piper Pest Control Co Ltd
6090 Thermokil Insect Control Services Ltd
9974 Three Counties Pest Control Ltd
1368 Tilda Ltd
9567 Toby Puddle
6835 Tony & Emma Smith Pest Control
7814 Top Cat Pest Control
9548 Topline Pest Control Ltd
9517 Tornado Pest Control Limited
9553 Total Control Pest Solutions
1370 Total Pest Control (UK) Ltd
6468 Total Pest Control Solutions
8365 Total Solution Pest Control Services Ltd
9490 Total Support Services Ltd
10253 Town & Country Pests
7483 Trafford Council
10051 Tudor Pest Control
6426 Tulip Healthcare Ltd
5026 Tyne Tees Pest Control Ltd
2098 Unbugged (Lancaster City Council)
9627 Unique Pest Solutions Ltd
5588 United Solutions North West Ltd
5589 Universal Pest Control (Midlands) Ltd
8783 Urban Hawks T/A Fumigill
6663 Utility Wolf Ltd
1375 Valley Pest Control Ltd
6847 Valley Pest Solutions
2861 Van Vynck Environmental Services Ltd
9469 VectaShield Pest Control

8751 Venables Pest Control
1107 Vergo Pest Management Ltd
6674 Verisure Environmental Ltd
9454 Veritas Pest Consultancy Ltd
2666 Vermatech Pest Control
4193 Vermex Ltd
2230 Vermikil Pest Control Services Ltd
6553 Verminate City & Rural Pest Control Ltd
5233 Vertech Pest Control
8156 Viable Services Ltd T/A Viable Pest Control
4553 Vine Pest Control
9982 W. Brush T/A Orswell Environmental Solutions
1378 WAB Logistics Ltd
9759 Wade Environmental
10275 Walker's CS Ltd
10049 Wasprats.com
5867 Wealden Bird and Pest Solutions
5558 Wessex Pest Control Ltd
8984 West Country Pest Control
10398 Westart Apiaries
1382 Western Pest Control
10113 Whelan Pest Prevention T/A HPC247
7636 Wildlife & Ecology Services
8821 Wiltshire Pest Services Ltd
6957 Wipeout (UK) Ltd
9732 Wynsdale Waste Management Ltd
8814 Wyre Forest Pest Control
9191 Xenon Pest Prevention & Control Ltd
6868 Xeric Ltd
5490 Xpel Environmental Services Ltd
1386 Yorke Pest Control Ltd

8243 Zero Tolerance Pest Control Ltd

8977 ZF Pest Management Services Ltd

Appendix 3

Use of rodent glue boards in Wales – five case studies

Bakery - Welshpool

Why use glue boards?

- Speed (rodenticides too slow)
- Public health
- Food contamination
- Traps had failed

Several rats were spotted on site within the large bakery storage areas. Pest control was immediately called as it's a very sensitive environment.

Rodenticides would have taken too long. Waiting risked contaminating lots of food and having to shut down for a deep clean. Camera and snap traps were put down however the adult rats avoided the traps completely.

The site was an old listed building meaning that proofing would be limited, time consuming and expensive. Plus, it wouldn't have dealt with the rats already inside.

Several glue boards were placed. Two rats were caught overnight and dispatched in the morning (8 hours down).

Once the entry point was confirmed work could be completed to proof the specific access point identified by the glue board they were caught on.

No rodent problems have been identified on the site since.

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Farm house – [REDACTED]

- Rodenticides inappropriate
- Traps impractical
- Property damage

The backdoor of a farmhouse was left open and a rat had then been seen in the kitchen. The owner started the rat and it made its way into the wall via an empty electrical socket. The rat could now be heard in the bedroom.

The farm was organic so rodenticides were not allowed on site. Traps would have been impossible to place in the wall and disturbing the entry point with a trap would have risked the rat looking for alternative routes.

A single glue board was placed by the access point. Within half an hour it was quickly caught and dispatched.

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Multiple takeaways and restaurants – Central Cardiff

- Rodenticide too slow

- Trap-shy rodents
- Speed vs reputational damage

Roughly once a month a takeaway will call [this company] because an environmental health officer has closed a takeaway or restaurant because of evidence of a mouse in their building.

It doesn't matter how clean a takeaway is, anyone with a door is at risk of a casual intruder.

Rodenticide in these situations is far too slow. Closing the business for that long would do serious reputational damage and impact cashflow.

Trap will rarely work when there is plenty of available food and these city rats know to avoid them.

Glue boards are placed in the building overnight. After 6 hours they're check and 99 times out of 100, the rodent(s) is caught and humanely dispatched.

The environmental health officer will then return and ask us to do another glue board treatment overnight to prove they're all gone. Again, we place the boards down and 99 times out of 100, there are no rodents – meaning the business can reopen.

A business is then only closed for 48 hours maximum. No other treatment works this quickly.

Closing a food business for 2-3 weeks while rodenticide starts to work will be devastating for these small businesses. You can pass off 48 as maintenance, but 2 weeks and the reputation of these businesses will be done for.

This member was adamant that the Welsh Government talk to their local councils and EHOs to hear how they think a ban would impact their communities.

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Hospital kitchen – Gwent

- Height restriction on traps
- Rodenticide would be too slow
- Vulnerable people
- Food preparation area

A hospital kitchen was closed as a mouse was behind the cooker. The industrial unit wouldn't fit a trap and a rodenticide would have take over a week to take effect.

The hospital had many patients to feed, however it wouldn't have been safe to cook while the mouse was still in the kitchen. Hospital staff were feeling the pressure, as was many vulnerable people on the ward.

Glue boards were placed around the cooker and people were told to leave the room. In a few hours the pest controller was back to dispatch the caught rodent.

The kitchen was reopened after a good clean by the hospital staff.

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Housing association – Monmouth

- Vulnerable adult, children and pets
- Inaccessible to traps

Pest controller was called to housing association owned house. A vulnerable adult with two children and pets.

The rodent was in a gap between a waste pipe and a wall. The mother had her two children on the back garden as she was so scared of the rodent. She was inconsolable.

Rodenticide would have been too slow – the women would literally not come back in the house until it was gone. No trap would fit between the gap in the pipe. Neither would have been suitable long term because of the pet dogs.

The pest controller placed glue boards around the pipe so the rodent couldn't escape. The family went to a friend for the afternoon.

With the house empty it took less than 10 hours for the rodent to be caught.

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Appendix 4



From: [REDACTED]@rentokil.com>
Sent: 24 April 2023 15:38
To: Ian Andrew
Cc: [REDACTED]
Subject: Re: Glue Traps in Wales

Hi Ian

Thank you for your email.

We are in fact writing to both Defra and the Welsh government, we now know which colleagues internally had a meeting with Defra and they state their version of the conversation is different in parts to what Defra passed onto the Welsh Government . It is currently being handled by our general counsel to gain more information from both Defra and the Welsh Government to see if we can get the Welsh Government to at least revert to our current position in writing - which in summary is to support the ban for general use and professional use to continue under licensing.

I will have a conversation with our legal counsel re a black and white statement and revert back to you once I have spoken to them.

■

[REDACTED] | Rentokil Initial

[REDACTED]

Compass House | Crawley | Manor Royal | West Sussex | RH10 9PY | UK

On Mon, 24 Apr 2023 at 15:18, Ian Andrew <ian@bpca.org.uk> wrote:

Hi [REDACTED],

I hope all is well with both of you.

Just wondering if you got anywhere with [REDACTED]@DEFRA?

I am at the Welsh Conservative Party Conference this weekend to try to drum up support to amend the Bill in Wales. We are considering a final battle, potentially challenging the advice provided to the Welsh Parliament, particularly advice given by civil servants to the Minister and to the select committee.

It would be really helpful to have Rentokil's position on Glue Boards in black and white to support this.