

May 26, 2022

**Re: IPMR Rodenticide Intentions Paper**

Established in 1953, The Fur-Bearers is a registered charity dedicated to promoting coexistence with wildlife and protecting fur-bearing animals in the wild and confinement. The Fur-Bearers welcomes the opportunity to provide comments on the Integrated Pest Management Regulation (IPMR) Rodenticide Intentions Paper, specifically around the use of second-generation anticoagulant rodenticides (SGARs).

With reservations, we commend the government for proposing a general prohibition on SGAR use in British Columbia. The Science Review<sup>1</sup> conducted by the Ministry of Environment and Climate Change Strategy provides sufficient evidence on the harms of SGARs and firm rationale for prohibiting SGAR use and access to the public. However, we have concerns regarding the broad exemptions to this ban, the failure to prohibit other harmful pesticides, and the lack of strategic policy on adopting non-lethal alternatives to rodent management across all sectors. Our submission will touch on these latter points first and conclude by addressing specific details on the proposed changes.

While we welcome proposed changes that would restrict the use of SGARs in BC, an unintended consequence of prohibiting the use of SGARs is that the general public or commercial operators may simply switch to an allowed rodenticide without making meaningful effort into an IPM approach. The Science Review noted on page 63 that rodenticides are “an economical approach”, but that “most rodenticides also carry a significantly higher hazard potential to impact human health or the environment compared to non-pesticide options.” An example noted of a non-anticoagulant rodenticide in the Science Review is nerve poison Bromethalin, which has no antidote and is stated as presenting an increased risk to people and animals.<sup>2</sup> Serious risks to humans, animals, and the environment should not be disregarded for the sake of economic expediency.

Our position, like the views of some respondents surveyed and noted in the Scientific Review, is that humane, non-lethal measures should be the default approach in preventing and managing rodent infestation. Continuing to permit the use of rodenticides does not address root problems and allows for an overreliance on products that cause harm to animals and the environment with no long-term benefit. The province’s strategy to address the risks from SGARs must necessarily extend to other products and include a plan to phase-out all rodenticides. In their place, non-lethal, humane alternatives and preventative measures need to be adopted as the standard, requiring a shift in attitudes, policies, and practices towards rodent management. One of the findings from the Science Review suggests this approach is both cost-effective and efficacious:

*Rodent management programs that combine exclusion efforts with ongoing environmental sanitation programs provide the most cost-effective and long-term infestation control, and some pest management professionals have shifted to this model. (Page 70)*

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<sup>1</sup> [https://www2.gov.bc.ca/assets/gov/environment/pesticides-and-pest-management/legislation-consultation-new/rodenticide\\_science\\_review\\_2021.pdf](https://www2.gov.bc.ca/assets/gov/environment/pesticides-and-pest-management/legislation-consultation-new/rodenticide_science_review_2021.pdf)

<sup>2</sup> Van den Brink, N.W.; Elliott, J.E.; Shore, R.F.; and Rattner, B.A. (2018). Anticoagulant rodenticides and wildlife: Concluding remarks. In N.W. van den Brink, J.E. Elliott, R.F. Shore, and B.A. Shore, R.F. and Coeurdassier, Rattner (Eds.), Anticoagulant Rodenticides and Wildlife (1st ed., pp. 379-386). Springer.

Rodenticides, whether SGARs or otherwise, are inhumane and dangerous products and their use should be prohibited across the board in the province. It is critical that all sectors take measures to coexist with animals (rather than resorting to lethal methods) by repairing buildings and infrastructure to incorporate robust exclusion and sanitation programs that will reduce and prevent rodent access. A serious strategy to address the problems inherent in rodenticide use must include a timeline to discontinue them, rather than allowing them to be used indefinitely.

Notwithstanding the above, our feedback on the specific changes to the regulations are as follows:

- We are supportive of Integrated Pest Management requirements, including prohibitions on preventative baiting. When SGARs are used, there needs to be sufficient enforcement and monitoring of IPM programs. The ministry needs to ensure that IPM practitioners have taken all actions to restrict access of rodents to sites using non-lethal control measures prior to the use of SGARs, including removing attractants, preventing access to buildings, repairing infrastructure, and other clearly defined humane control measures.
- The impact of predator management on rodent management needs to be considered when users are granted access to use SGARs. Exemptions provided to agricultural operations and other sectors that trap and kill natural predators of rodents should be restricted, as killing carnivores disrupts the balance in ecosystems which is vital to keep rodent populations stable.<sup>3</sup>
- We are supportive of prohibiting the use of SGARs in critical wildlife habitat, although there should not be exemptions to this prohibition, including the proposed exemption for government personnel. Other approaches should be explored and utilized by government when managing conservation programs in critical wildlife areas. In addition, the defined critical wildlife habitat areas are not sufficient in protecting sensitive wildlife from primary or secondary poisoning, as wild animals do not observe fixed boundaries within sanctuaries, ecological reserves, etc. For example, birds such as raptors and owls often make their homes in urban centers. Allowing the use of SGARs outside of critical wildlife habitats does not avoid primary or secondary poisoning to these species, companion animals, or other non-target animals.

As The Fur-Bearers are focused on coexisting with wildlife, particularly in urban centers, we strongly encourage the adoption of non-lethal alternatives to wildlife management, whether they are rodents or otherwise. Animals share communities with humans and this will not change. Rodenticide use does not solve root problems; we urge the province to work with municipalities, the essential service sectors listed in the Intentions Paper, and other stakeholders to work to phase-out the use of rodenticides entirely.

Thank you for considering our submission. We will close by citing a paragraph in the Science Review (page 68) that resonates with our work and our similar hope for a paradigm shift in rodent management:

As a result of their comprehensive analysis, Himsworth (2020) recommended a paradigm shift away from the goal of rodent elimination in urban landscapes. Instead, communities should aim to share the urban ecosystem with this wild animal while identifying, preventing, and mitigating the associated impacts. This ecologically-based strategy prioritizes environmental management and monitoring, rather than an ultimately ineffective and reactive approach of isolated control measures, such as piecemeal baiting programs (Colin and Jackson 1999).

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<sup>3</sup> For example, a 2020 Narwhal investigation found that hundreds of wolves and coyotes were being trapped and killed in the agricultural sector in British Columbia through the Livestock Protection Program, which is partially funded by the province. <https://thenarwhal.ca/bc-cattlemens-association-livestock-wolves/>