

Explanatory NoteUnderstanding the IPM Regulation

Prevention Measures When Using SGARs

Introduction

Explanatory Notes are intended to clarify requirements of the Integrated Pest Management Regulation (IPMR) for people using pesticides in B.C. Readers should refer to the IPMR directly to fully understand their legal obligations, as inspectors rely on the regulation when assessing compliance.

The IPMR states that second-generation anticoagulant rodenticides (SGARs) can only be used by licensed applicators for essential services, and only as part of an Integrated Pest Management (IPM) program. Licensees must implement prevention activities to solve the rodent issue before considering SGAR use.

This document explains the prevention requirement when using SGARs and clarifies who may participate in this regulated activity under the IPMR to help applicators understand this requirement.

Reasons for Requirement

The purpose of this requirement is to ensure that SGARs are only used as a last resort, after other methods have been fully explored. This helps protect non-target wildlife and the environment by limiting the risks associated with rodenticide use.

Prevention is the key to controlling rodents sustainably. Instead of just relying on continuous rodenticide use, it's more effective to avoid attracting rodents and stopping them from getting inside in the first place. This means sealing up holes, keeping areas clean, securing food sources, and removing anything that could attract rodents. By focusing on prevention, people can reduce the need to use rodenticides.

Relevant Sections of IPMR

Following sections of the IPMR concern prevention measures when using SGARs:

35 (6): A licensee who uses an SGAR must keep a record containing the following information:

(b) Measures that were taken to comply with the requirements set out in section 68 (1) (a).

Key Points:

- SGARs are rodenticides that contain the active ingredients brodifacoum, bromadiolone or difethialone.
- SGARs can only be used by licensed applicators for essential services, and only under IPM principles.
- Prevention must be completed before considering SGAR use.
- Prevention includes, but is not limited to, exclusion, improving sanitation, and removing food and nesting sources.
- Licensees are responsible for ensuring prevention measures are fully in place before SGAR use. These measures may be carried out by the client.
- Licensees must verify and document prevention activities.
- IPM is an ongoing process that requires flexibility and adaptation to changing conditions.

68 (1): Except as provided in section 7 (1) [licence requirement exemptions], a licensee may use a pesticide only after doing all the following in accordance with integrated pest management principles:

(a) Identify and implement, or identify and advise the owner, occupant or manager of the treatment area of, reasonable measures to prevent pests.

Prevention when using SGARs

81 (5): A licensee must not do any of the following:

- (c) Use an SGAR at a treatment site unless practical alternatives to the use of an SGAR have been implemented and have not been effective in relation to the management of rodents;
- (d) Use an SGAR at a treatment site unless the licensee ensures that the owner, occupant or manager has implemented the measures described in section 68 (1) (a), if the licensee is not personally implementing those measures.

Understanding the Requirement

Implementing Measures to Prevent Pests

Before considering SGAR use, licensees must first attempt to address the rodent problem through preventive measures combined with practical alternative methods. SGARs may only be used if the issue was not able to be resolved quickly enough through these approaches. Monitoring of continued rodent activity beyond threshold levels following these attempts would be required to warrant consideration of SGAR use.

Under the IPMR, the licensee remains responsible for ensuring that preventive measures are in place before considering SGAR use. These measures may be carried out by the client or others (such as contractors or maintenance teams), but the licensee must confirm that the work meets the regulatory requirements outlined in Section 68(1)(a). This collaborative approach provides flexibility in how the required prevention steps are completed and properly documented (see below: Documenting Prevention Activities).

It's important to note that prevention goes beyond exclusion (sealing entry points). It includes a range of strategies to prevent rodent infestations effectively. Licensees should ensure they are well informed about strategies to prevent rodent infestations and have incorporated these into their services. For detailed information on prevention and practical tips, review <u>Integrated Pest Management for Rodents: A Guide for Residents</u>.

Documenting Prevention Activities

Licensees must record the measures taken to prevent rodents and be prepared to provide records for compliance verification purposes in the case of an inspection.

According to Section 35(6) of IPMR, a licensee using SGARs must document the prevention measures taken to comply with Section 68(1)(a). The IPMR does not prescribe a specific format for documenting prevention work and licensees must develop their own documentation to include all required entries. The <u>Rodent Management Plan template</u> available on the ministry's website, provides a useful resource for this purpose. For additional confidence in meeting regulatory requirements, licensees may consult with IPMP staff to discuss proposed prevention methods or documentation approaches.

Additional Sources of Information

Explanatory Note: Conducting IPM In-Between Baiting Cycles of SGAR Use

For more information about the regulation, prevention tips and appropriate use of rodenticides in B.C., please visit www.gov.bc.ca/RodentIPM or email BC.IPM@gov.bc.ca.