

Corporate Policy

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Section:	Engineering, Operations, and Public Works	11
Sub-Section:	Environmental Management	5280
Title:	Rodenticide Use	2021-01

Related Policies

Number	Title
13-6870-2019-01	Naturescape Principles

Approvals

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Policy Statement

The most common rodenticide products currently in use include anticoagulant ingredients. After feeding on these products, rodents first become lethargic and display abnormal behaviour, becoming easier targets for predators that can accumulate these toxic ingredients in their bodies to lethal levels. Studies have demonstrated the significant extent of secondary poisoning of wildlife attributed to the use of these products.

To minimize the impacts of toxic substances on target and Non-target Wildlife, it is the Policy of the City of Port Moody that:

- the use of Anticoagulant Rodenticide or other Regulated Substances for rodent Pest Management is prohibited on all City-owned properties, except where expressly authorized as a last resort option by City senior management;
- the use of Anticoagulant Rodenticide or other Regulated Substances for rodent Pest Management is restricted when providing City-led vector control on private property; and
- the use of Anticoagulant Rodenticide or other Regulated Substances for rodent Pest Management is discouraged on private property.

Definitions

A list of relevant definitions is included as Appendix A.

Policies

The following policies guide the use of rodenticides in the City of Port Moody.

1. Pest Management services on City-owned property, or contracted by the City for private property, must be supervised by approved Pest Management service providers in accordance with this Corporate Policy.
2. Property Managers concerned about Pest Infestation must engage a Pest Management Service Provider before undertaking any activity.
3. Pest management Service Providers must follow the Integrated Pest Management Framework for Rodent Control (Appendix B), which is based on the precautionary principle of avoiding the use of toxic chemicals and reducing and/or eliminating the impacts of toxic substances on target and Non-target Wildlife.
4. Private property owners, residents, stratas, and businesses shall be educated on the harmful side effects of Anticoagulant Rodenticide use and encouraged to follow the Integrated Pest Management Framework (Appendix B) and alternative Pest Management options.

Monitoring/Authority

Monitoring and administration of this policy is delegated to the General Manager of Community Services.

Appendix A – Definitions

Anticoagulant Rodenticide(s) means either a first-generation or second-generation rodenticide that disrupts blood clotting metabolic processes, causing severe or fatal internal hemorrhaging in animals, and is mixed with an attractant for use in Pest Management activities. Products include first-generation Anticoagulant Rodenticides (FGAR) and second-generation Anticoagulant Rodenticides (SGAR). FGAR means a generally less acutely-toxic rodenticide, requires multiple feedings to administer a lethal dose, and metabolizes more quickly in the body tissue of rodents. SGAR means a generally more acutely-toxic rodenticide that requires only a single feeding to administer a lethal dose and remains in the body tissue of rodents longer.

Captive Bolt Trap means any mechanical device that incorporates a force-driven bolt or piston to kill Pests and is authorized for use in Canada.

City-owned Property means any land and any building or structure on such land, either owned or controlled by the City of Port Moody, on which legal authority to regulate Pest Management exists.

Electronic Kill Trap means any mechanical device that employs electrical current to trap and kill Pests authorized for use in Canada.

Glue Board(s) means trays coated with adhesive, used to eliminate rodents, insects, and snakes as an alternative to Snap Traps or other Population Control forms.

Live Capture Trap means a mechanical device authorized for use in Canada, designed so that the capture does not injure the Pest.

Non-target Wildlife means any mammal, insect, bird, amphibian, reptile, or other living organisms that are not the target of Pest Management or Pest Management activities.

Non-toxic Bait Attractant means a substance not listed in the List of Toxic Substances (*Canadian Environmental Protection Act*, Schedule 1) to attract Pests for Population Control.

Pest, in the context of this Policy, refers specifically to rodents targeted by Pest Management activities.

Pest Infestation means the occurrence of Pest(s) in or around a building or structure such that the occurrence is or is likely to cause damage to the building or structure and/or to generate a health risk to the occupants or users of the building or structure, as determined by a Service Provider.

Pest Management means the integrated and comprehensive compilation of actions undertaken to reduce or eliminate a Pest Infestation.

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Population Control means Pest Management activities specifically designed to reduce or eliminate and control the Pest(s) population inside or near a City-owned property under the supervision of a Qualified Professional (QP).

Property Manager means a person or company employed by either the City or a leaseholder to perform property management and maintenance activities on City-owned property, or a person who otherwise represents the City regarding a City-owned property or the leaseholder on City-owned property.

Regulated Substance means any substance used in Pest Management and required to be used under special licence as determined by the *Integrated Pest Management Act* and *Integrated Pest Management Regulation*, both as amended or replaced.

Rodenticide means a Regulated Substance used in Pest Management for Population Control of rats or mice as part of Pest Management.

Service Provider means a company or corporate entity or person registered and approved to conduct business on City-owned property with at least one Qualified Professional (QP) in its employ to oversee Pest Management.

Qualified Professional (QP) means a person employed by a Pest Management Service Provider or contracted by a Pest Management Service Provider who has (1) a minimum of seven years' working experience in the design and delivery of Pest Management; or (2) an undergraduate degree from a recognized university or college or a diploma from a recognized technical college in a relevant subject such as biology or animal science and a minimum of three years' working experience in Pest Management design and delivery.

Snap Trap means any mechanical device that incorporates a spring-loaded mechanism to trap and/or kill Pests.

Appendix B – Integrated Pest Management Framework for Rodent Control

1. **Assessment**

An assessment is conducted to confirm whether Pest(s) are present and whether they are causing or can cause damage to the building or pose a risk to its occupants/users. This assessment may demonstrate that very limited or no Pest Management activity is required and that Population Control is unnecessary. If no Pest Management activity is needed, the assessment results should be recorded and provided to the Property Manager, and no further action is required.

- a) Prior to any Pest Management activities, the Property Manager must have a Pest assessment carried out by a Service Provider.
- b) The Service Provider must inspect areas potentially subject to Pest Management and conduct interviews of Property Managers and occupants. The inspection may include visual inspection, motion-activated cameras, or other methods to collect evidence of a Pest Infestation.
- c) The Service Provider must record all details and prepare an assessment report on the likely presence of Pest(s) inside or within a reasonable distance of the building/structure. The report must identify Pest(s) to species level, discuss the evidence gathered, adaptive behavioural traits of the Pest(s) influencing this specific occurrence, and any other relevant information. Details on Pest ingress into the building/structure (including locations, pictures, and descriptions) should also be included.
- d) If Pest(s) are confirmed, the next step is to determine whether a Pest Infestation exists. Using the assessment data, the Service Provider will determine the approximate numbers and species of Pest(s) present, Pest-specific or potential damage to the building/structure, and human health risks or other risk-related information.

2. **Mitigation Planning and Implementation**

Based on the assessment, the Service Provider formulates a mitigation plan in keeping with the level of risk present. Mitigation planning and implementation have three components:

(1) Access Prevention; (2) Attractant Management; and (3) Population Control.

2.1. **Access Prevention:** *to reduce entry points into buildings and structures.*

- a) The Service Provider should recommend modifications, where practical, to each Pest entry point into the building/structure. This should be done for each Pest targeted for Pest Management activity in the risk assessment.
- b) The Property Manager must be consulted before changes to the building/structure are made. In particular, building envelope perforations (nails, screws, etc.) must be pre-approved.
- c) The Service Provider should also recommend modifications to remove safe harbourage inside or in proximity to the building/structure, including selective vegetation management adjacent to buildings. Any modifications, in particular for vegetation management, should be done by the Property Manager.

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- d) The Service Provider and Property Manager must ensure that any building/structure modifications do not interfere with the harbourage, nest, or roost sites for important and protected Non-target Wildlife, including protected bat roosts and bird nests.

2.2. **Attractant Management:** *to deny food and water to Pests in an area where they are unwanted*

- a) In consultation with the Property Manager, the Service Provider should prepare an education program to inform Property Managers and occupants on attractant management and specifically recommend changes or modifications to avoid attracting Pests and providing harbourage.
- b) Educational materials should include specific examples to ensure that in-unit waste management and waste collection and pick-up areas (e.g., solid waste, compost, recycling, etc.) are kept clean and do not attract Pests. Information on local Bylaw requirements should also be provided. For facilities that host pets, livestock, or other Non-target Wildlife, educational materials should be provided to ensure that strict storage protocols are used to manage food and water resources on site.
- c) The Service Provider should identify specific situations that require disinfection cleaning to remove accumulated deposits of attractant materials or health risks (e.g., steam cleaning, etc.).

2.3. **Population Control:** *to reduce Pest numbers or control a Pest Infestation*

- a) Population Control must be overseen by the Service Provider involved in the previous steps or another Service Provider who has reviewed the last Pest Management activity. Population Control is the final step in mitigation planning and implementation. Population Control is generally only a short-term solution at targeted locations.
- b) Trapping as Population Control can be done using either a Live Capture Trap or other device designed to lethally and humanely kill a Pest, with minimal impacts on Non-target Wildlife. A trapping program must be designed and supervised by the Service Provider and be appropriate for specific Pest and site conditions. The trapping program should meet the following requirements:
 - Snap Traps, Captive Bolt Traps and/or Electronic Kill Traps, or Live Capture Traps can be deployed by the Property Manager under the oversight of a Service Provider.
 - Glue Boards or sticky boards are prohibited, as these have been linked to animal welfare concerns and are not approved for use.
 - Rodent bait traps using Regulated Substances, including first- or second-generation Anticoagulant Rodenticides (FGARs and SGARs), are prohibited except where expressly authorized as a last resort option (see Step 3).
 - The Service Provider is responsible for ensuring that risk to Non-target Wildlife by any proposed trapping is reduced or eliminated when placing or

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using traps. Traps should only be accessible to Pest(s) that are targeted by Pest Management activity.

- Trap locations must be recorded on a site plan and include an accompanying monitoring plan appropriate to trap type.
- Traps must be marked with the name and telephone number of the Service Provider and not set in open or publicly accessible areas where the public, Non-target Wildlife, or pets can easily access them.
- Traps can contain a non-toxic bait attractant.
- The Service Provider must provide a dispatch report for each monitoring visit where trapped Pests or Non-target Wildlife are captured. The report will document the release or disposal of trapped animals.

3. Monitoring and Adaptive Management

At sites where attractant management or Population Control measures are implemented for Pest Management, the Service Provider must continue to monitor the site to ensure long-term success. A monitoring plan should be prepared for these sites with details on the type of monitoring activity scheduled and the frequency of application for any Pest Management activity. Periodic inspections are recommended, particularly in any communal waste collection areas. Building occupants with Pest issues should make their units available for monitoring inspections by the Service Provider or Property Manager. Access prevention also needs to be monitored and maintained to ensure that Pests do not regain access to the building/structure.

Monitoring should be documented and provided to the Property Manager. The monitoring results should include feedback for the Property Manager and building occupants.

The use of Anticoagulant Rodenticide or other Regulated Substances may be necessary in limited circumstances where a Service Provider has followed the Integrated Pest Management Framework, has exhausted all other options, and must avoid or address a Pest Infestation. In these cases, the Service Provider and Property Manager require express authorization by senior management for the use of Anticoagulant Rodenticide or other Regulated Substances, which would be used in a targeted and site-specific manner. In such cases, more frequent monitoring by the Service Provider should be incorporated into the Pest Management plan, including criteria for ensuring use of Anticoagulant Rodenticide is short-term. All rodenticides must be disposed of according to product label directions or manufacturer's instructions.

4. Reporting and Compliance

No further reporting is required if a completed assessment (Step 1) did not identify a Pest Infestation or recommend any form of mitigation or Population Control.

After completion of the first cycle of Pest Management activity (Step 2) followed by a phase of monitoring and adaptive management (Step 3), the Service Provider must document all work. All assessment and monitoring reports must be kept in a format that can be digitally transferred to the City upon request, and retained by the Property Manager.

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The City can direct that a Pest Management Service Provider be audited for compliance with the Rodenticide Use Policy. Audits will be carried out by City Environment staff or a suitably qualified professional. Service Providers found to be conducting Pest Management that is not in compliance with this Policy will no longer be allowed to conduct Pest Management on City-owned property or on behalf of the City.

Integrated Pest Management Framework for Rodent Control

Figure 1 – Four-step program to assess, plan, implement, and monitor Pest Management activity conducted on City-owned property.

