



Rt Hon Steve Barclay MP  
Secretary of State for Environment, Food and Rural Affairs  
House of Commons  
London  
SW1A 0AA  
stephen.barclay.mp@parliament.uk

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### **Urgent: Key Stakeholders Ignored by Minister Pow Regarding Glue Trap Licensing Concerns**

Dear Secretary of State,

I hope this email finds you well. I am writing to urgently bring to your attention the shrugging off we have received from Minister Pow regarding our recent communication concerning the proposed glue trap licensing scheme and to escalate the matter.

British Pest Control Association (BPCA) represents the UK pest management industry and promotes high standards of professionalism to safeguard environmental and public health.

As Chief Executive Officer of the BPCA, I previously reached out to Minister Pow to express our significant concerns regarding the proposed scheme. Our letter highlighted the potential detrimental effects of the scheme on businesses, food security, and public health, and emphasised the need for meaningful consultation and reconsideration of its restrictive measures.

Defra wrote to key stakeholders on behalf of your department outlining the proposed licensing scheme for professional pest controllers. The scheme aims to allow them to continue using rodent glue traps to preserve food security and public health.

While we welcome your endeavours to develop a practicable licensing scheme for pest professionals, what has been proposed, with limited consultation and only six weeks before implementation, has some glaring faults, assumptions and omissions.

Despite our efforts, Minister Pow has come back with a response that has failed to effectively listen to the people this scheme is harming most. This lack of effective communication is deeply concerning, particularly given the imminent implementation of the scheme and the urgency of the issues at hand.

The response from Minister Pow shows a complete disregard for ours and other industries including hospitality, food and drink manufacturing and retail, and the risk that this policy has to the UK public in terms of economy, food supply, health and ultimately life.

A major UK supermarket has confirmed that a week closure of a store could cost £1.5m in lost revenue, meaning your department's restrictive scheme will cause major financial loss both for individuals who are out of work, businesses who have to burden the loss, farmers whose supply chain is affected and to HM Treasury for whom all of the losses will result in a loss of receipts.

I urge you, as Secretary of State, to intervene and ensure that our concerns are addressed promptly and effectively. Effective dialogue and collaboration are vital to ensuring that any regulatory measures implemented by the government are practical, balanced, and in the best interests of all stakeholders involved.

We have attached the letter sent to Minister Pow dated 29 April and the response we received dated 14 May. Additionally, we have copied in Steve Reed OBE MP, Shadow Minister of State, to ensure that these concerns are brought to the attention of the opposition and receive the scrutiny they deserve.

### **Food security and penalties to regional businesses**

The only aspect of food security from farm to fork in which professional pest controllers will be permitted to continue using rodent glue traps is 'food production with national distribution'. Whilst Minister Pow has agreed this is too restrictive and should not exclude regional distributors, the argument for local food production sites still stands.

I fail to see why the scheme differentiates local food environments and "regional" food environments when there is an equal risk to food safety and public health and why it simply cannot state all food production with distribution facilities.

Allowing glue traps to be used in food production sites shows an understanding that they are essential to public health, but whether that site distributes nationally should not be the deciding factor in whether a trap can be used.

The risk of rodent infestation and its impact on public health does not diminish once food leaves a production facility. The risks are still present as food moves through food warehousing to food retail through supermarkets, restaurants and takeaways. Equally, I cannot see how a small local food production business deserves any less protection than a large national company.

### **Dangerous oversights**

On class licenses, the permitted environments are overly restrictive and the requirement for advance registration makes it impractical for most situations, hindering effective pest control.

Many businesses, such as supermarkets, restaurants and accommodations, will be completely excluded from consideration for a licence. This will lead to lengthy closures for businesses or

dangerous conditions for consumers. Minister Pow has said she is not aware of how a ban on glue traps solely would lead to supermarket closure and makes many references to New Zealand in her letter.

In February this year, a major supermarket in New Zealand was shut for weeks due to a black rat infestation. The vice President of The Pest Management of New Zealand has said that “UK pest controllers are fortunate to have some great tools which are designed to control mice and brown rats which would be invaluable in New Zealand for the Black rat problem.”

Unfortunately, we do not have any alternatives to glue boards in their ability to stop severe infestations quickly. If available to this supermarket, any pest professional knows it would not have been forced to close for weeks. A major UK supermarket has told us that a week closure of a store could cost £1.5million, meaning this restrictive scheme will cause major financial loss both for businesses and Treasury.

Whilst this supermarket was in a city location, if in a food desert (which 1.2 million Brits live in), this would have had major implications on food security.

There is no provision for glue trap treatments in homes, even in the most dangerous situations. This means many of the most vulnerable people in England will be forced to live alongside severe rodent infestations for weeks while other methods of control begin to work. With glue traps, these rodents can be caught almost immediately and humanely dispatched in one visit.

On individual licences, we have been clear throughout that waiting for a licence to be granted is unworkable. In our experience with other licensing schemes, such as that for gulls, professional pest controllers typically wait for weeks for a licence to be granted, and the default position is not to grant a licence.

This means that businesses will inevitably face closure by Environmental Health Officers while they wait for the licence to be granted. In this respect, the scheme is not delivering on its aim to make glue traps available for high-risk situations, as time is limited in these scenarios. This is not a viable process for the many already fragile businesses.

## **Cost of pest management**

Much of the further guidance has been drawn from the Code of Practice and guidance documents already provided by BPCA to its members, which they adhere to. We acknowledge the shortening of the period of deployment to six hours as the only change that we are willing to support. However, this will mean that the cost of these treatments will have to increase significantly due to repeat callouts.

In addition, the proposed licensing scheme fees will mean businesses will likely face a bill of around £2,500 for each deployment of glue traps. Again, I suspect this will make their use non-

viable for most micro and small businesses in the sector. The fees will effectively push out smaller businesses that adhere to the same standards as larger ones.

All pest management companies will have to pass these costs on to customers, which means many businesses will have to choose between keeping their clients safe and healthy or paying significant treatment fees.

In practice, the huge fees do not guarantee the licence application will be successful, so either pest management companies will be out of pocket, or their clients will.

This entire model is a tax on pest management companies and businesses trying to protect clients and preserve public health.

### **Cost to business**

The already fragile hospitality industry will be significantly challenged by being omitted from the rodent glue trap licensing scheme.

There are 143,000 hospitality businesses in the UK (UK government), worth an estimated £93 billion (UK Hospitality). Each of those businesses generates an average daily turnover of ~£1,800.

Given that without glue boards, these businesses will have to close for around 14 days while a chemical programme takes place. That company will lose ~£25,200 in turnover across that period. Their costs don't stop during that period, so we'd estimate it's actually closer to £3,000 lost per day, meaning this licensing regimen could cost each unlucky hospitality business £42,000 per closure.

Similar challenges await the retail sector. UK food retail is worth £217 billion, of which Supermarkets make up £184 billion in sales (British Retail Consortium). Food retailers are excluded from the licensing scheme, too. The unlucky ones will lose ~£40,000 daily while their store is closed. That's £560k of lost revenue waiting for slower pest control measures taking place.

Coupled with this scheme disproportionately affecting SMEs, the cost of this blundered scheme will be astronomical for businesses and consumers.

Glue boards are already tools of last resort when all else has failed. This scheme means that businesses will close, food safety standards will fall, and food prices will rise.

### **Final thoughts**

If your intention was to effectively ban the use of rodent glue traps through licensing, which it patently was not, your officials have achieved this.

The last consultation for this scheme was June 2023, and Defra has provided a weak scheme only six weeks before it is implemented. We, who represent 80% of the industry, have been open to

discussions throughout this process but our concerns have fallen on deaf ears. We provided an outline of a scheme that was workable, but Defra has ignored this and created, effectively, a ban.

The Act states that licenses would be granted “for the purpose of preserving public health or public safety”, but the scheme is too restrictive to deliver this.

What is being proposed has caused significant concern, particularly from sectors in the food supply chain and hospitality, and I expect you will be hearing from their trade associations in due course.

We have collected feedback from our members and their customers, many of whom have already written to us in frustration and have passed this feedback on to Defra. However, given Minister Pow's response it is obvious that the consultation is in transmit rather than receive mode.

Defra and Natural England's ill-thought-out licensing scheme will cause disease, distress and business closures.

These plans put the welfare of rats and mice above human health and safety.

Banning glue trap use for the general public already alleviates all welfare concerns. These licences are punitive, disproportionate, bureaucratic and anti-business.

I've further copied in Az Chowdhury who is our Board Political and Communications Advisor. Az is acting on our behalf with relation to this issue.

We implore you to use your powers to carry out your duty in protecting public health by delaying the implementation of this licensing scheme until all industries affected by this scheme are engaged with and listened to.

Kind regards,



**Ian Andrew**  
Chief Executive  
British Pest Control Association

By email copy:

Minister Pow, Minister for Nature, Department for Environment, Food & Rural Affairs  
Steve Reed OBE MP, Shadow Secretary of State for Environment, Food and Rural Affairs



Az Chowdhury, Senior Partner, CGC

[policy@bpca.org.uk](mailto:policy@bpca.org.uk)