



# Position Statement on Sewer Baiting

November 2003

This paper sets out the CIEH position on the policy issues concerned with the baiting of sewers to control the rat population. Our concern, in accordance with our Royal Charter, is to maintain, enhance and promote improvements in public and environmental health. The CIEH believes that this objective is best served, in the context of strategies for sewer baiting and the control of rodent populations, by the inclusion of an element of proactive sewer baiting for the parts of local authority areas where this approach is most appropriate.

The CIEH supports strongly the National Protocol for Co-operation on Rodent Control, issued in 2000 by Water UK (the body formed by the water industry to act on its behalf) and the Local Government Association. This was the result of considerable joint work at the national level, following the establishment of the Rats in Sewers Group by DEFRA. It encourages the development of joint strategies between local authorities and water companies for sewer baiting and the control of rodent populations.

## The Debate on Proactive Baiting

Within the water industry and pest control sector there is considerable debate about the practice and effectiveness of proactive baiting of sewers. A recent study commissioned by Water UK and published by UK Water Industry Research Limited (Rodent Control in Sewers, ISBN 1 84057 220 5) in particular has questioned the value of proactive sewer baiting.

The water industry appears to be relying on this study and its conclusion that, in effect, proactive baiting is not cost effective. This has a potentially serious and negative impact on current strategies as well as future rodent control policy development and the CIEH believes that DEFRA should not rely on the study's conclusions as the sole basis for action and/or funding, and neither should the water companies.

The CIEH questions the validity of some of the conclusions of the study, especially regarding the costs and benefits of proactive sewer baiting. We believe there is a significant evidence base in support of proactive sewer baiting.

## Sewer Baiting: Costs and Benefits

The water companies claim that the 'reactive only' approach provides a level of service not significantly different from the alternatives and at £2 per km of sewer, compared with more than

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£10 per km of sewer respectively, the reactive approach is significantly cheaper than the proactive/reactive combination.

For the published study, cost effectiveness has been assessed largely from the perspective of the sewerage industry. This approach is inadequate because the costs and risks resulting from a failure to control effectively rats in sewers are borne by other agencies, particularly local authorities and the public.

The 2003 Pest Management Survey of Local Authorities, commissioned by the National Pest Advisory Panel under the auspices of the CIEH, and carried out by Salford University, has shown that the amount spent in relation to the timing of control did not vary greatly: those providing proactive baiting spent 6.6p per capita, those providing reactive baiting 4.6p per capita and those adopting both a reactive and proactive service 5.1p per capita. Per-capita figures better reflect the association between rats and people, and make for a better comparison between urban areas and areas of lower human population or less dense population. The Water UK report suggests that cost per kilometre is a more representative and appropriate measure of control costs, although this was based on a small number of responses. These differences in approach need to be reconciled.

## Reactive Baiting of Rodent Populations

The implication from the Water UK study is that sewers are a major reservoir of rodent populations. To rely merely on reactive baiting in sewerage systems when surface infestations show a marked increase, will make the populations more difficult to control and deal with. Although the presence of a rodent population on the surface does not necessarily mean that rodent activity exists in the sewer system below, subsurface populations can serve as a reservoir to potentially infest surface areas, particularly when there are defects in the sewerage infrastructure. Surface populations may in turn withdraw to the sewers when environmental pressures require, such as the onset of winter. The CIEH believes that a more holistic strategy is required.

## Proactive Baiting of Rodent Populations - a recommended approach

Proactive baiting has sometimes been practiced with a uniform percentage of manholes baited regardless of the presence of rats. There is no uniform distribution of rats below ground any more than there is on the surface, and factors have been identified that increase the risk of dwellings becoming infested. The CIEH does not advocate such a blanket approach.

Token or mechanical poisoning in a sewer system will kill some rats, but the population will quickly be restored. Even where a population has been reduced to a very small percentage of that originally in place, recovery to the original number can occur within six months.

A thorough and more considered operation can not only reduce a population to a small fraction of its original size, but with treatment at the surface, and minimisation of routes for re-invasion by proper repair and maintenance of the sewerage system, there will be a very slow rate of recovery.

Local knowledge and records within a local authority can help identify those areas of a borough where the sewers contain, or are likely to contain, larger populations of rats. Proactive baiting can therefore still allow for the targeting of resources, as well as helping to prevent movement of the rats through the sewer catchment area, or out of the sewers.

# The National Protocol for Co-operation on Rodent Control

The pest management survey also demonstrated that awareness of the Protocol amongst local authorities is, at best, variable. Around 67% of all local authorities responded to the survey, and of those, 47.5% were actually unaware of the Protocol's existence. Of authorities that were aware of it, 61.9% said they complied with its recommendations, but only 40.9% of these authorities thought the water companies complied with the Protocol. Only 32.3% of responding authorities said that regular liaison took place with water companies.

The CIEH therefore believes that more must be done to promote the Protocol and spread its model of co-operation and all the partners at local and national level can contribute to this. Local environmental health departments should, for instance, establish regular liaison meetings with water companies and establish the commitment of the local sewerage undertaker(s) to the Protocol. Further liaison may be on an individual basis or via a local pest liaison group.

In particular, the focus should be on developing joint strategies that include an element of proactive sewer baiting for those parts of the local authority areas where it is most appropriate.

Local authorities also need to be satisfied as to the competence of contractors undertaking sewer baiting for the sewerage companies, and should advise them of suitable training if required.

## National Protocol for Co-operation on Rodent Control

1. Where a Water UK member commences a new sewer baiting activity it should inform the local authority.
2. Where a local authority commences a new baiting activity to combat rat infestation it should inform the relevant Water UK member.
3. Where possible sewer baiting and baiting to combat rat infestation should be undertaken in a complementary manner by agreement between the Water UK member and the local authority.
4. Water UK members and local authorities should share information regarding the success of baiting strategies and the baits used.
5. Where there is an advantage in doing so, local liaison groups should be established between Water UK members and local authorities to facilitate successful rodent control in sewers.
6. Within the bounds of commercial confidentiality, Water UK members and local authorities should share information on the costs of rodent control.

Water UK members and local authorities should jointly review on a regular basis their operation of this Protocol with a view to improvement.

*(Issued by Water UK and the Local Government Association, 2000)*

The CIEH believes that the Protocol will work most effectively if the partners pursue the following objectives:

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## Local Authorities should:

- Establish regular meetings with water companies on the basis of the Protocol.
- Develop joint strategies with water companies regarding sewer baiting and the control of rodent populations.
- Include within their sewer baiting strategies an element of proactive sewer baiting for the parts of local authority areas where this approach is most appropriate.

## Water Companies should:

- Establish regular meetings with local authorities on the basis of the Protocol.
- Develop joint strategies with local authorities regarding sewer baiting and the control of rodent populations.
- Work with local authorities to ensure the competence of contractors undertaking sewer baiting.
- Receive evidence from CIEH on the value and cost-effectiveness of proactive sewer baiting within rodent control strategies, as illustrated through an extensive evidence base of research and publications.

## The Government should:

- Receive evidence from the CIEH regarding the relative merits of proactive and reactive sewer baiting in the control of rodent populations.
  - Keep under review the effectiveness of the Protocol.
  - Recognise the value and cost-effectiveness of proactive sewer baiting within rodent control strategies, as illustrated through an extensive evidence base of research and publications.
  - Recognise more positively and give active support to local authorities when fulfilling their duties and using their powers to deal with rodent populations.
- i. For its part, the CIEH will promote the Protocol to its members using its regular communications channels and continue to support national liaison between the partners, so reinforcing the principles of the Protocol. The CIEH will be providing evidence to water companies and Government on the value and cost effectiveness of proactive sewer baiting within rodent control strategies.