

## SEPA Position Statement - Burial of small quantities of rodent carcasses poisoned on farmland

---

### **Background**

Rodenticides can be defined as any substance that is used to kill rats and mice. Anti-coagulant products, which kill by preventing normal blood clotting, causing internal haemorrhaging, are the most popular types and their use is widespread. Various studies and analysis<sup>1</sup> have highlighted the presence of anti-coagulant Rodenticides<sup>2</sup> in the carcasses of predatory birds and mammals.

The proper use of Rodenticides, such as employing a planned approach or covering baits to prevent access by non-target species, is one approach to preventing unnecessary exposure. However one of the main causes of exposure in predatory birds and mammals is caused by the ingestion of dying vermin, or the carcasses of dead vermin, which have not been collected for proper disposal.

### **SEPA's Position**

In order to facilitate the speedy disposal of rodent carcasses thus limiting the risk of secondary poisoning, SEPA have taken the following position:

#### **Animal by Products:**

Wild animals will be subject to the requirements of the Animal by Product Regulations<sup>3</sup> 'when suspected of being infected with diseases communicable to humans or animals'<sup>4</sup>. SEPA are not the competent authority for the ABP regulations and you should contact your local Animal Health office for further guidance.

#### **Burial of individual or small numbers of rodent carcasses:**

The on-site burial of individual or 'small' numbers' of poisoned rodents will be allowed, without the need for a licence or exemption, provided it is done without delay and meets the following requirements:

- Carcasses must not be buried:
  - within 250m of any drinking water supply; or
  - 50m from any watercourse; or
  - 10m from any field drain
- Carcasses must be buried:
  - no less than 1m in depth

---

<sup>1</sup> Pesticide Poisoning of Animals 2007 – Report of Investigations in Scotland M J Taylor, E A Sharp and A Giela (SASA)

<sup>2</sup> Brodifacoum, bromadiolone, chlorophacinone, coumatetralyl, difenecoum, diphacinone, flocumafen & warfarin

<sup>3</sup> [www.environment-agency.gov.uk/netregs/63515.aspx](http://www.environment-agency.gov.uk/netregs/63515.aspx)

<sup>4</sup> Art 4(1)(a)(v) of Regulation 1774/2002

#### SEPA Position Statement

---

- in dry soil/ground only
  
- in sites where there is at least 1m of subsoil at the bottom of the pit.

Burial holes/pits must not contain more than 10 recognisable carcasses at any one time

Additionally, on site burial must meet the relevant objectives of the waste framework directive by 'ensuring that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular without –

- (i) risk to water, air, soil, plants or animals; or
- (ii) causing nuisance through noise or odours; or
- (iii) adversely affecting the countryside or places of special interest.'

Please note that this position statement is not applicable to professional pest control operatives or local authorities.

#### **Burial of carcasses caused by large scale extermination**

Where carcasses are the result of a large scale extermination programme SEPA expects that arrangements are made for off-site disposal.

#### **Professional Pest Control or Local Authorities**

SEPA expect that professional pest control companies or local authorities do not bury rodent carcasses on-site and that they take advantage of the pre-arranged disposal routes already available to them, their employees should gather and take the carcasses for disposal at an authorised facility, such as a landfill or incinerator.

#### **Enforcement**

SEPA still retains the right to take enforcement action and to review these positions in the light of policy/legislative changes and if the activity has caused, or is likely to cause, pollution or harm to health.