Government Oversight Group Report on the rodenticides stewardship regime

Annual Review 2025

■ Including an update on strengthening the regime

November 2026

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Introduction

The requirement for a UK rodenticide stewardship regime was launched in July 2015. At that time, HSE, on behalf of government bodies with a role in monitoring the use and impact of rodenticides, published High-level principles for rodenticide stewardshipHigh-level principles for rodenticide stewardship to ensure that the risks arising from rodenticide use are properly controlled.

Scope

This report sets out the broad conclusions from the Government Oversight Group's (GOG) annual review of the operation of the Campaign for Responsible Rodenticide Use (CRRU UK) rodenticide stewardship regime during 2025. The annual review aims to determine whether the hHigh-level principles for rodenticide stewardshipigh-level principles continue to be met by the CRRU UK regime. This paper avoids duplicating the significant data and other information CRRU UK are required to collect and present to GOG annually, please refer to Annexes 1, 1A and 2 of previous years' reports for these details. Information and data submitted by CRRU UK are made available on the CRRU UK website (www.thinkwildlife.org/downloads). This assessment follows the format of earlier reports, which reflect commentary on information provided by CRRU UK and remains valid at the time of writing.

This report also provides an update on the work of GOG and industry to strengthen the CRRU UK regime.

Background

Rodenticides are regulated as biocidal products in Great Britain (England, Scotland and Wales) under the GB Biocidal Products Regulation (GB BPR) (legislation.gov.uk). The EU Biocidal Products Regulation (EU BPR) (eur-lex.europa.eu) continues to apply in respect of Northern Ireland (NI). GB BPR and EU BPR aim to ensure that biocides can be used without causing unacceptable harm to people, the environment and non-target animals. Both regulations set requirements for the assessment and authorisation of biocides. HSE acts as the Competent Authority (CA) for both GB and NI, under GB and EU BPR respectively, and leads UK policy on biocides. Responsibility for UK pest control policy is shared between Defra and the UK's devolved governments.

All first and second-generation anti-coagulant rodenticides (FGARs and SGARs), and rodenticide products containing cholecalciferol, fail the environmental risk assessment in respect of their use outdoors. However, their use outdoors is necessary to control rats and

mice because of the threat they present to public health, animal health and infrastructure. Rodents pose significant risks to the safety of food supply chains and food hygiene because they are attracted to areas where food is grown, stored, prepared and sold, and because rodents are vectors for many food-borne pathogens that pose a serious risk to people and livestock.

Rodenticide stewardship continues to play an important role in the authorisation of professional rodenticide products under BPR. Government's high-level principles emphasise the importance of integrated pest management (IPM) which places the use of rodenticides within a strict hierarchy of risk controls for rodents. This means that where users adhere to good practice, professional rodenticide products will only be used where necessary, thereby minimising the risks they pose to people, non-target species and the environment.

In partnership with the sector, CRRU UK developed a regime to meet the requirements set out in the high-level principles. The CRRU UK regime remains the only scheme judged to have met the high-level principles. The CRRU UK regime covers all manufacturers and suppliers of professional rodenticide products in the UK, and its delivery is managed and coordinated by CRRU UK. In addition to the high-level principles, Government set out requirements for monitoring the regime.

Each year, CRRU UK are required to report on the delivery and performance of their regime to GOG, which is chaired by HSE and comprises representatives of other government stakeholders: HSE NI, Defra, UK Health Security Agency (UKHSA), Natural England, the Welsh and Scottish Governments and independent scientific advisers the UK Centre for Ecology and Hydrology (UKCEH). GOG's role is to ensure that the CRRU UK regime meets the high-level principles to minimise exposure to people and non-target wildlife.

Earlier GOG reports have reviewed the implementation of the CRRU UK regime to assess the extent to which the high-level principles are met.

High-level principles for rodenticide stewardship

The approach to the development and operation of rodenticide stewardship is shaped by the following benefits that are expected to arise from a functional stewardship scheme:

- governance of the supply chain, ensuring that professional rodenticide products are only supplied to approved retail outlets and sold to those trained to use them as part of an IPM strategy;

- a competent workforce capable of delivering stewardship standards and of demonstrating an appropriate understanding and attitude toward case-specific control of rodents and use of rodenticides; and
- monitoring compliance with the regime and its environmental impacts and, if possible, an assessment of whether rodenticides and stewardship together are actually tackling the problems.

The principles underpinning rodenticide stewardship are:

a. Use of integrated pest management (IPM), including use of rodenticides, involving a hierarchy of risk controls for rodents.

b. Responsible use of rodenticides, when demonstrated they are needed, because of their potential threat to human, animal health and the environment.

c. Applicability to all suppliers, handlers and professional users of rodenticides in scope of stewardship, to address these risks.

d. The need for the regime to be robust, effective, and workable, while remaining as simple as possible.

e. The need for the regime to cover the whole lifecycle of the rodenticide products: manufacture, supply chain, end-use, disposal and environmental fate.

f. The enabling of good practice in the control of rodent populations, as part of an IPM system, while minimising resistance build-up and secondary poisoning in non-target species.

Annual assessment of the CRRU UK rodenticide stewardship regime against the high-level principles

Overview

The annual review of the CRRU UK rodenticide stewardship regime comprises 3 stages:

1. Evidence that the industry has put in place what it said it would.
2. Evidence and indicators of industry's response and changes of behaviour.
3. Evidence and indicators of impact.

In relation to stage 1, overall, GOG considered that the key features of the CRRU UK regime continue to operate as required by the high-level principles.

In relation to stage 2, GOG welcomed the information and associated monitoring data that CRRU UK provided as evidence that the regime is operating as intended. In addition, GOG noted CRRU UK's continued work to establish a 'competent workforce'. Here, CRRU UK have implemented agreed improvements to training and certification arrangements, which came into force 1 January 2026. The changes mean that users of professional rodenticides must undertake training every five years or have membership of a CRRU UK approved continuing professional development (CPD) scheme. GOG also notes CRRU UK's earlier decision to ensure that, since 31 July 2022, all CRRU UK approved training is regulated by the Office of Qualifications and Examinations Regulation (Ofqual).

In relation to stage 3, GOG noted the information provided by CRRU UK as evidence of the regime's impact, including oversight of supply chains and building competence through:

- the continued uptake of CRRU UK training provision and CPD; and
- the ongoing maintenance of best practice guidance, including plans to update templates used to support environmental risk assessments (ERA) for rodent control.

In the absence of more recent data, GOG again noted the most recent predatory bird monitoring scheme (PBMS) barn owl report by UKCEH, published in 2022. The absence of more up to date monitoring data reflects the enforced pause in monitoring during 2023 and 2024 due to outbreaks of highly pathogenic avian influenza (HPAI). The monitoring

evidence provided by the 2022 report indicated that, overall, total residue levels have remained at the 2016 levels. At the outset of the regime, it was hoped that robust controls implemented via stewardship might lead to a statistically significant reduction in SGAR liver residues in barn owls over time when compared to the baseline years.

Key benefits - governance of the supply chain (proof of competence at point of sale)

CRRU UK rodenticide point of sale (RPOS) controls ensure that professional rodenticides products are only sold to people who present the correct accreditation information, as proof of competence. GOG have identified the need for a robust system of competence checks undertaken at RPOS outlets as being essential to the proper functioning of the stewardship regime. CRRU UK RPOS audits are undertaken by independent auditors employed by BASIS (Registration) Ltd. The audits to certify compliance for each RPOS outlet ensure that professional rodenticide products are only supplied to those with appropriate accreditation. CRRU UK members have committed to only supplying their products to outlets that have successfully passed the BASIS audit. CRRU UK's independent audit process grades outlets' performance against the required standard, identifying outlets that have met the required standard and those where remedial improvement and follow-up is needed.

The results for 2025 show that, of the 603 premises audited, there was a pass rate of 99.8%. The pass rate comprises 94.3% of premises that passed the initial audit, with 5.5% who were provided with a qualified pass meaning that remedial action is required. A small number of outlets (33) have withdrawn from the audit process and the number of premises who failed audits remains relatively low at 0.2%. CRRU UK have earlier confirmed that where poor performance is identified but not rectified, RPOS outlets will be prevented from selling professional rodenticide products. Affected RPOS outlets will not be re-supplied until a new audit has been undertaken and passed. Newly registered RPOS outlets are not supplied with professional rodenticide until they have been audited.

Alongside fulfilling CRRU UK responsibilities for supply chain governance, RPOS restrictions also drive demand for the take-up of CRRU UK accredited training, best practice and CPD, because only appropriately competent people, accredited under the CRRU UK regime, can purchase professional rodenticides.

GOG noted the ongoing work to update the RPOS audit process to reflect the new training requirements which came into effect on 1 January 2026. This has included utilising BASIS auditors to ensure that RPOS outlets and their customers were prepared for the changes to demonstrating competence. GOG noted that limiting proof of competence to CRRU UK approved accreditation at RPOS may increase demand for the take-up of CRRU UK accredited training and CPD among users of professional rodenticide products or

encourage further reliance on professional pest controllers to undertake rodent control operations.

Key benefits - competent workforce

GOG noted CRRU UK's efforts to raise and embed good practice across the sector. During 2025, CRRU UK have continued to provide approved training via four awarding organisations (AOs), namely BASIS (Registration) Ltd., City and Guilds/National Proficiency Tests Council (NPTC), Royal Society for Public Health (RSPH) and Lantra. To date AOs have awarded 45 018 CRRU UK approved training certificates and qualifications.

Responding to earlier feedback concerning accreditation provided via farm assurance schemes (FAS), CRRU UK have implemented agreed changes to training and certification. From 1 January 2026, the only proof of competence accepted for the purchase of professional use rodenticides will be either:

- certification from a CRRU UK approved training course within the past five years
- certification from a CRRU UK approved training course more than five years ago **and** current membership of a CRRU UK approved CPD scheme

This means that from 1 January 2026, accreditation obtained via any of the FAS will no longer allow users to purchase professional rodenticide products. GOG noted CRRU UK's successful implementation of the new arrangements and welcomed their efforts to support pest controllers, gamekeepers and farmers via additional resources available from the CRRU UK website.

The knowledge, attitude and practice (KAP) survey remains the main tool for monitoring workforce competence. The KAP surveys are significant undertakings and GOG noted CRRU UK's plans to undertake the next survey during 2026. The first KAP survey was completed in 2015 with follow-ups in 2017, 2020 and 2023. The survey, conducted by an independent provider on behalf of CRRU UK, has provided evidence of improvement across all professional rodenticide user groups, including increases in the uptake of training, CPD, environmental awareness and product knowledge.

GOG have previously welcomed CRRU UK's analysis of KAP survey data on the impact training is having on the adoption of best practice, integrated approaches to pest management and whether this is leading to changes in behaviour.

Key benefits - monitoring compliance

Residues

UKCEH through their operation of the PBMS provide independent residues monitoring analysis to GOG. Submissions to the PBMS ceased in March 2023 due to HPAI and the effects of several outbreaks continue to impact residues monitoring. This has meant that data normally collected from the analysis of carcasses submitted to the scheme was unavailable to support UKCEH reports for 2023 and 2024. UKCEH reported that samples had been accepted in late 2024, although the number of submissions normally required have not been reached. GOG agreed to UKCEH proposals to analyse the available barn owl samples during spring and summer 2026.

As previously reported, the latest monitoring data and analysis are set out in the UKCEH 2022 report which, consistent with data collected earlier in the review period, has concluded that there were few differences in liver SGAR accumulation between the baseline years and in 2022. Overall, the sum of all residues had remained unchanged over the monitoring period for both red kites and barn owls. However, the 2022 report has identified changes in the ratios of individual active substances noting a reduction in difenacoum and bromadiolone and an increase in brodifacoum.

Rodent resistance to SGARs

Resistance monitoring is a key requirement for the delivery of the CRRU UK regime. Resistance to anticoagulant rodenticides is widespread in the UK among both house mice and Norway rats. Resistance to rodenticides happens when mutations known as single nucleotide polymorphisms (SNPs) occur. There are at least five resistance mutations in Norway rats and at least two in house mice that are known to reduce their susceptibility to some SGARs.

CRRU UK's provision of information on the geographical distribution of resistance mutations is important for the conduct of rodent control operations. Where users are aware of resistant rat and mice populations, they can ensure that only the most effective SGAR is chosen, using the smallest amount of bait, to control infestations. Resistance data collected by CRRU UK is shared with the international Rodenticide Resistance Action Committee (RRAC) (rrac.info). RRAC makes interactive maps available to users enabling them to check the status of resistance in their locality and obtain information about effective interventions.

CRRU UK reported on the frequency of resistance among the Norway rat tissue samples sequenced in the period 2024 to 2025. Of the 122 samples that were capable of being sequenced, a total of 106 (86.9%) were found to carry one of the five main Norway rat anticoagulant resistance mutations. The remaining 16 samples carried the wild-type gene. This shows that the proportion of resistant Norway rats in the sample was higher than that

found in previous surveys. A possible reason for this is the high proportion of the rats sampled in the period 2024 to 2025 were received from Scotland where there is a very high prevalence of one of the five resistance mutations (referred to as L128Q SNP) among rat populations.

GOG welcomed CRRU UK's success in securing Science and Advice for Scottish Agriculture (SASA) as the new testing provider, following the unexpected withdrawal of the previous supplier. GOG noted the challenges arising from the logistics of locating existing test packaging and amending their details, uncertainty about how long existing tails could be stored, and the negative impact on publicising the tail testing programme across the key winter period 2024 to 2025. GOG also noted CRRU UK's plans to continue to encourage the submission of samples, especially in under reported locations throughout the UK.

Conclusion

GOG remains content that the CRRU UK rodenticide stewardship regime continues to meet the high-level principles. GOG noted the importance of recommencing the analysis required to monitor the pattern of residues in barn owls over the post-stewardship period. This will support ongoing efforts to influence the ratio of SGAR residues present in submitted carcasses. GOG again noted the relative increase in the ratio of brodifacoum residues when compared to other SGAR residues detected.

Strengthening stewardship – update on progress

GOG continues to work with CRRU UK to take forward work to strengthen the stewardship regime. The areas identified as requiring specific focus were:

1. revisiting the data from the current monitoring arrangements
2. revisiting the benefits and impact provided by key controls such as the operation of point of sale controls
3. supporting CRRU UK efforts to further embed best practice among key user groups

The separate working groups, comprised jointly of GOG and CRRU UK members, have identified recommendations for improving and strengthening the CRRU UK regime. In brief, these are:

1. **Revisit monitoring data** - focussing on including additional species for the purposes of residues monitoring
2. **Improve the operation of point of sale controls** - focussing on new arrangements to systematically collect additional data relating to the quantities of rodenticides placed on the UK market and utilising RPOS controls to gain further insight on the broad groups of rodenticide users.
3. **Embed best practice among user groups** - focussing on supporting the implementation of a number of changes, including new training standards for the farming and gamekeeping sectors.
4. **Understand the key drivers of resistance** – focussing on identifying further controls that might manage and slow the spread of resistance.

GOG and CRRU UK welcomed the working group proposals and were able to agree to the majority of them in principle. For a limited number of recommendations, further work is required to enable GOG and CRRU UK to provide similar agreement. GOG will publish the outcome of the 5-year review and agreed recommendations in 2026. The next steps will be for GOG and CRRU UK to agree the timing and approach to implementing the recommendations as part of embedding the changes into the CRRU UK regime.

Further information

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