

PAN Europe

Pesticides Action Network Europe

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Subject: Application of strychnine hydrochloride for essential use by the UK.

We call upon the European Commission to reject the authorisation of strychnine for essential use in the UK. Strychnine is highly toxic and banned in a number of countries for use as a biocidal product.

Strychnine has a high potential to be misused if it remains on the market. It is used to poison moles causing them to suffer an unnecessarily slow and agonising death. Additionally, it endangers other wildlife which feed on dead moles, and its availability for mole control has led to widespread illegal use for other purposes. Viable and humane alternatives for mole control are in use in many European countries in conditions not substantially different from the UK¹.

The economic damage caused by moles on farms is not significant. There are a small number of cases when mole control may be necessary (for example on horse training runs or on runways), but in most cases they need not be regarded as pests, and can be beneficial in controlling ground-dwelling pests. The EU Health and Environment Commissioner Markos Kyprianou has refuted claims by some mole-catchers that moles may be a threat to health and says the Commission is not aware of any scientific evidence indicating that the presence of moles in soil poses specific health risks for other animals or humans². In some European countries moles are a protected species.

We believe there are not sufficient reasons to support the approval of an essential use for strychnine and to maintain this highly hazardous substance in the market until 2010 and beyond. According to Article 4a of the Commission Regulation No 1048/2005 laying out conditions for the authorisation of essential uses of biocides: *“Member States may apply to the Commission for an extension of the period laid down in Article 4(2) where they consider that an active substance listed in Annex III or VII is essential for them for reasons of health, safety, protection of cultural heritage or is critical for the functioning of society, and where there are no available technically and economically feasible alternatives or substitutes that are acceptable from the standpoint of environment and health.”*

¹ DEFRA (2004), A review of methods used within the European Union to control the European Mole, *Talpa Europaea*, available online at <http://www.defra.gov.uk>

² Chris Davies (2006), *The death of strychnine*, Pesticides News No 72, page 7

The UK fails to show evidence of reasons of health, safety, protection of cultural heritage or that strychnine is critical for the functioning of the society. On the other hand, alternatives exist in the form of fumigants, traps, repellents, fences and earthworm control but their implementation involves the training of operators and some initial costs. Humane trapping is one of the most effective methods of mole control when conducted by an experienced operator, and fumigation with phosphine-gas is the most widespread method of mole control among those EU states (Belgium, Denmark, France, Germany and UK) that have at some time treated moles as pests. The current cost advantage in using strychnine is largely due the existence of well trained and experienced operators and a pest control market that has been using strychnine baits for many years without incentives to shift to other methods of mole control. This shift to other control methods and training of operators would have high costs initially but those costs would be rapidly recovered.

PAN Europe believes mole infestations should be treated on a case by case basis. In cases where control is deemed necessary the most appropriate method should be selected. The indiscriminate use of a poison like strychnine just because it is a cheap must meet an end.

Sincerely yours:

A handwritten signature in black ink, reading "Sofia C. Parente". The signature is written in a cursive style with a large initial 'S'.

Sofia Parente
(Coordinator/Administrator, Pesticides Action Network Europe)