

## **Report: Rodent Pest Management by the City of London**

Prepared in May, 2024 by members of AWCAC and ESACAC

### **Executive Summary**

The Animal Welfare Community Advisory Committee has raised concerns about the use of rodenticides within the City of London in light of secondary risks posed to wildlife, pets, children and the environment. Background information about this issue is available from [this 2021 science review](#). There is a lack of data to indicate whether the City's existing approach to managing rodent pests in its buildings is resulting in effective control. Alternative strategies are discussed, including development of public education and adjustments to the City's contract.

### **Recommendation**

AWCAC pass a motion in the spirit of the following:

1. AWCAC requests that the Senior Manager of Facilities return to AWCAC prior to the City renewing its contract for pest control service in 2025 to review the scope of the contract and discuss alternative strategies to use of poison at municipal facilities.
2. AWCAC will strike a working group to prepare recommendations for print and online communications to support public education about best practices to prevent rodent infestations and apply rodent exclusion methods at residential buildings.
3. AWCAC request that Civic Administration forward this report to the Community and Protective Services for consideration.

### **How are rodent pests managed at municipal facilities?**

The City of London has a contract for pest management at municipal facilities that gets renewed every two years. This contract is arranged by staff in the [Procurement and Supply office](#), subject to the [Procurement of Goods and Services Policy](#). A competitive bid is advertised and bid upon. This information is not reported to Council as it is considered low-dollar and operational. The current contract is held by a group called [Metro King Pest Control](#), a Canadian company with operations in London, Toronto, Windsor and elsewhere.

The terms of the contract are given in a [quote report](#) that was presented by staff (Val Morgado, Senior Manager, Facilities) to AWCAC on April 4, 2024. There are two types of pest control services rendered, with Type 1 being the relevant to the discussion about rodenticides. In the staff report, section 3.4 Successful Bidder Responsibilities includes:

- n) The Contractor shall inspect and refill bait, insect and rodent bait stations (units) monthly.*
- o) The City may request the Contractor to remove and dispose of dead animals at the Facilities.*

Type 1 services provide high level rodent control using interior and exterior rodenticide bait traps. The primary purpose is to control pest issues. Currently rodenticide bait stations are used at 27 different locations operated by the City of London. These locations tend to be operations yards (e.g. EROC where sanitation trucks go, City Hall, community centers; locations are specified in the staff report).

The City's approach to dealing with rodents is reactive. The contractor will only ever use poison to respond to rodents. However, they do not apply exclusion methods to prevent rodents from entering buildings. Live traps are occasionally used for larger animal relocations.

## Environmental impact

Under the Kunming-Montreal Global Biodiversity Framework, Canada is obligated to reduce by half the overall risk posed by pesticides and highly hazardous chemicals by 2030 ([Target 7](#)). The rodenticide compound used in the bait stations is *Bromadiolone* (sold under the name *Conrac* by Bell Laboratories). Product information is available [here](#). Bromadiolone is one of the compounds researchers have detected in most birds of prey tested in Ontario, indicating it poses a risk of bioaccumulation ([source](#)). Use of Bromadiolone is restricted in [British Columbia](#) and [California](#). Wildlife and domestic animals in London are susceptible to secondary rodenticide poisoning, with many documented cases involving predators such as eagles, owls and pet dogs and cats. The extent of harm caused by rodenticides is expected to be underreported in London; animals typically exhibit symptoms only in the final stages of lethal poisoning.

## Existing pest management is not evidence-based

Inspections at each municipal facility are performed once a month by the service contractor, to detect if there is an infestation of rodents and to maintain bait boxes. If signs of an infestation are found, additional poison may be applied. The City does not collect any data on the effectiveness of their existing contract for pest control service. The contractor will keep a log of how the bait stations are maintained but there aren't formal metrics or key performance indicators. **AWCAC is concerned that applications of poison to kill rodents will lead to more rodents taking their place, resulting in a positive feedback loop that does not resolve the root causes of infestations, while perpetuating significant and unnecessary environmental contamination.**

## A proactive approach: pest-proofing buildings

Outside of the pest control service contract, as part of building maintenance the Facilities team does regular building audits and inspections, which include checking exterior and interior areas for damage or openings that could be problematic. If issues are found, the City will usually try to fix these in-house before going to a pest control company. However, inspections are not necessarily checking for rodent points of entry, which tend to follow predictable patterns at most buildings.

In the [London Plan City Building Policies](#), section 400 (page 38) describes building maintenance, including: *6. An Integrated Pest Management Plan may be required and implemented to manage pests in accordance with all applicable federal, provincial, and municipal laws.* In general, the pest control service contract deals with Integrated Pest Management. A building manager and facilities staff will look after particular types of buildings. Some buildings have unique challenges associated with their uses, structure, location, etc. However, there is no city-wide Integrated Pest Management plan, and no documentation of pest control measures for individual buildings. Pest control is dealt with separately by individual service areas of the City.

## The Pickering Model

In December 2023 the City of Pickering [became the first municipality in Ontario](#) to implement a policy on rodenticide use. [This policy](#) restricts the use of rodenticide on municipal land and in municipal facilities. Pickering also provides public information about pest management on its website (referring to [information from Durham Region](#) emphasizing alternative strategies to poison). The Facility manager in Pickering is Kevin Haynes who has been engaged by City of London staff regarding this policy and lessons learned. Staff in other municipalities such as Clarington and Toronto are currently reviewing the Pickering model.

## Next Steps

At the April 4, 2024 AWACAC meeting, the Facility Manager indicated they would be open to receive community feedback for when the next contract cycle is up (est. March 2025). In particular they expressed interest in pursuing preventative strategies that will ultimately be more effective than reacting with poison (noting that poison killing rodents will simply lead to more rodents replacing them, if the underlying causes of infestation are not addressed).

Given ongoing challenges with rodent pest control at certain facilities in London, AWACAC has identified a need for public information about how to prevent rodent infestations (e.g., storing food and waste, sealing points of entry). The City does not currently offer any printed pamphlets or information on its website about preventing pests.

AWCAC is proposing to create dedicated stickers for high-risk areas for rodent activity (e.g., cafeterias, waste collection points) to be distributed to the public, similar to the following existing stickers. Messaging should focus on cleaning up / storing food correctly to limit pests and referring people to the City's website for more information about dealing with rodent issues.



AWCAC will also create public information content for an information pamphlet and new City webpage about pests, and proactive management strategies. The webpage could adapt content produced from the London Environmental Network / Bird Friendly London [Responsible Pest Management program](#) or adapt resources from [British Columbia](#), [City of Pickering](#), [City of Waterloo](#), etc.

In 2025, AWACAC will review the City's next contract for pest management at municipal facilities, and may propose adoption of a Council policy similar to the [City of Pickering](#) to reduce or eliminate use of rodenticides as deemed appropriate. In tandem with a new policy, AWACAC could help the City to develop an Integrated Pest Management Plan for its facilities to provide detailed information about preferred proactive strategies, such as implementing infestation reporting tools, inspecting buildings for points of entry and applying exclusion methods.