



UNDERSTANDING THE EPA RODENTICIDE RISK MITIGATION DECISION FOR **TEN RODENTICIDES****

MAY/JUNE
2011

Background

The Environmental Protection Agency (EPA) began reassessing in the 1990s the impacts and benefits of all rodenticide active ingredients designed for use to control commensal rodents (Norway rat, roof rat and house mouse) and published measures designed to reduce risks associated with these products. The EPA Risk Mitigation Decision for Ten Rodenticides was released 28 May 2008. The objectives of the risk mitigation decision was to reduce the risk of accidental rodenticide exposure in children and to reduce the risk of accidental poisonings in pets and wildlife.

In the decision, the EPA concluded that certain types of active ingredients and formulations present greater opportunities for misuse and accidental exposure than others. They cited data that suggested second-generation anticoagulant active ingredients were evident in the tissues of some wildlife casualties. Based on their conclusions, the EPA has taken steps to limit access to rodenticides based on the applicator type and the active ingredient of the product. The rodenticide active ingredients included in the risk mitigation decision are listed in Table 1.

» **TABLE 1. Rodenticide Active Ingredients Included in the Risk Mitigation Decision**

Class	Active Ingredient
Acute Toxicant	Bromethalin
	Cholecalciferol
	Zinc Phosphide
First Generation Anticoagulant	Chlorophacinone
	Diphacinone
	Warfarin
Second Generation Anticoagulant	Bromadiolone
	Brodifacoum
	Difenacoum
	Difethialone





Mitigating Risks to Children

In the Risk Mitigation Decision, the EPA reports that only a very small number of exposure cases involving children result in medical symptoms or cause adverse health effects each year. However, the Agency believes that the incidence of childhood exposures remains unacceptably high, and specific measures that are designed to reduce the risk of exposure to children are included in the decision. To minimize the likelihood of exposure to children, rodenticide products will only be sold to consumers packaged inside bait stations. Pellet bait formulations will no longer be sold to consumers, but will continue to be available to professional applicators.

Mitigating Environmental Risks

In an attempt to reduce accidental exposure of pets and non-target animals, restrictions will be placed on the sale and distribution, minimum package size requirements, and use sites for rodenticides containing the four second generation anticoagulant active ingredients (bromadiolone, brodifacoum, difethialone, difenacoum). Most of these restrictions do not apply to acute toxicants or first generation anticoagulants. The sale and distribution of second generation anticoagulant rodenticides will be restricted to the professional and agricultural markets. These products will only be available through professional distribution chains and farm supply stores and will not be marketed to consumers or made available in box stores, hard-

» TABLE 2. Summary of Changes Required by the Rodenticide Risk Mitigation Decision

"Consumer Size" Products (Products containing ≤ 1 pound of bait)

- May not contain brodifacoum, difethialone, bromadiolone, or difenacoum (the second-generation anticoagulants).
- Loose bait forms such as pellets are prohibited.
- Each retail unit must include a bait station.
- Bait refills may be sold with bait stations in a single retail unit.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

Second-Generation Anticoagulant Products for Use Around Agricultural Buildings

- Products must contain at least eight pounds of bait.
- Bait stations are required for all outdoor, above-ground placements of second-generation anticoagulant products.
- Bait stations are required indoors if exposure to children, pets, or non-target animals is possible.
- Product labels must indicate that the product is for use only in and around agricultural buildings and that use in residential use sites is prohibited.
- Distribution to and sales in "consumer" stores including grocery stores, drug stores, hardware stores, club stores will be prohibited.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

Second-Generation Anticoagulant Products for Professional Applicators

- Products must contain at least 16 pounds of bait.
- Bait stations are required for all outdoor, above-ground placements of second-generation anticoagulants.
- Bait stations are required indoors if exposure to children, pets, or non-target animals is possible.
- Distribution to and sales in "consumer" stores including grocery stores, drug stores, hardware stores, club stores will be prohibited.
- Applications must be made inside or within 50 feet of buildings.

*Adapted from <http://www.epa.gov/pesticides/reregistration/rodenticides/finalriskdecision.htm> (accessed 8 march 2011)



In the past, rodenticide bait labels included a distinction between “Urban” and “Non-Urban” use patterns. This label language will no longer be required, simplifying the directions for use section and clarifying application sites for users.



ware stores or other retail outlets serving non-professionals. In addition to having limited sales locations, the second generation anticoagulants will only be packaged in less than 8 lb containers for products labeled for agricultural use, and 16 lb containers for products to be used in and around homes. Finally, all applications of second generation anticoagulant baits must be made within 50 feet of a building and all above ground applications must be inside tamper resistant stations. Application of second generation products inside rat burrows (without a station) is acceptable, provided the specific label allows it and the burrow is within 50 feet of a building. A summary of the label changes required for second generation anticoagulant baits is provided in Table 2.

How the Rodenticide Risk Mitigation Decision Impacts Pest Management Professionals

There are three label language changes which affect pest management professionals directly. In the past, rodenticide bait labels included a distinction between “Urban” and “Non-Urban” use patterns. This label language will no longer be required, simplifying the directions for use section and clarifying application sites for users.

The new labels for all “General Use” rodenticides will include wording restricting use to the inside, or within 50 feet of a building. There are numerous rodent infestation control efforts which will be complicated by this new language. A few examples in which rodent infestations may be more than 50 feet away from a building include:

- Norway rat burrows under dumpster pads, and in embankments, or retaining walls
- Roof rat infestations in fruit and ornamental trees or those affecting outdoor food and feed storage
- House mouse infestations in telecommunication junction boxes and under cattle feed bunks

In addition to these examples, many additional rodent infestation sites located greater than 50 feet from buildings will be off-limits for treatment.

The third label language issue was not part of the original Risk Mitigation Decision but is expected to be found on new labels. On products labeled for Norway rat, roof rat and house mouse, manufacturers are now required to add the word “only” after the listed pests. This negates the 2(ee) exemption written into FIFRA (use against a pest not on the label as long as the application site and technique are on the label). Therefore, rodenticide bait intentionally applied according to label instructions (i.e. within 50 feet of a building and inside tamper-resistant stations) for a target pest not listed on the label (ex. voles) could be interpreted as a misapplication.



What's next?

Under the Risk Mitigation Decision, rodenticide manufacturers are required to stop shipping rodenticide products bearing labels or packaging that is not in compliance with the decision by 4 June 2011. Some manufacturers have already introduced new packaging with revised labels in advance of the deadline. Distributors and pest management professionals may continue selling and using products bearing old labels after the 4 June deadline until all supplies are exhausted. <<

** At the time of writing this, there are two issues that may impact the substance and timing of these changes. The first is a lawsuit brought by the manufacturers of consumer rodenticide products against EPA. Secondly, NPMA and the manufacturers continue to talk with EPA about possible changes.

FREQUENTLY ASKED QUESTIONS

Can I continue to apply rodenticides according to the old label directions after June 4th?

Yes. Distributors can continue to sell and professionals can use existing products until all supplies are used up. The June 4th deadline applies to manufacturers only.

When will I begin seeing rodenticide products with the new label language?

Some manufacturers are already shipping rodenticides in compliance with the Risk Mitigation Decision. It's important to note that during the transition time, products bearing the "old" and "new" label language may be in your possession. *Always read and follow the label instructions on the container you are using.*

Can I apply bait in rat burrows that are located more than 50 feet from a building?

No. Rodenticide products containing the new label language do not allow for application inside burrows if the burrow is located more than 50 feet from a building.

Are bait stations required for second generation products if they are applied indoors?

If exposure to children, non-target animals or pets is possible, yes.

